

Appendices Part 4

Comments INDIV-200s

Comments INDIV-300s

Comments INDIV-400s

Comments INDIV-500s

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 31, 2024 1:14 PM
To: Sutton, Drew; ARCF_SEIS
Cc: publiccommentARCF16@water.ca.gov
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: Christie Vallance <christiev44@gmail.com>
Sent: Wednesday, January 31, 2024 10:45 AM
To: SPK-PAO SPK <SPK-PAO@usace.army.mil>
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

Hello

I have serious concerns about this project which will affect my way of life.

- 1 | Please have a PUBLIC MEETING to share your response to my email requesting a more targeted and less destructive approach to the American River Parkway work.
- 2 | This is a very special section of the parkway. The Wildlife corridor alone is reason to have a less invasive approach here!

Thank you

Christie Vallance

Near Larchmont Park

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, January 30, 2024 12:23 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Mitigation for denial of public access

From: Ron Beals <bealsron@gmail.com>
Sent: Tuesday, January 30, 2024 10:39 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Mitigation for denial of public access

You don't often get email from bealsron@gmail.com. [Learn why this is important](#)

1 This project was initially scheduled for two years of construction. It is now apparently being extended. It does not appear there was ever appropriate mitigation for the extended denial of public access to the levee, for bicyclists, walkers, fishermen and other levee users. To mitigate this extensive denial of a public resource, it seems appropriate that public access should be improved as part of the project. Suggested ways to do this would be to pave the top of the levee where the work has been completed, which would make it available to road bikes and less experienced riders, such as children and/or contributing to the acquisition of easements to facilitate completion of the long planned Sacramento River Trail.

Ron Beals

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Monday, January 29, 2024 4:20 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River Contract 3B

From: shirley romboid <sjrombold@gmail.com>
Sent: Monday, January 29, 2024 4:14 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River Contract 3B

You don't often get email from sjrombold@gmail.com. [Learn why this is important](#)

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

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

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

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

The American River Parkway is extremely valuable to me. I have lived near the river since before there was a parkway. It is the reason we chose to stay and live in Sacramento. When I was able I walked frequently along the trails enjoying nature and the feeling of being away from civilization.

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.

Shirley Rombold

From: [Ellen Robinson](#)
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 18, 2024 5:56:58 AM

You don't often get email from ellenr@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. 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 rivers 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

Sent from AT&T Yahoo Mail on Android

From: [Jodie](#)
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: Friday, January 19, 2024 8:37:35 PM

[Some people who received this message don't often get email from jodielee73@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.

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

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

From: [cary hart](#)
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 21, 2024 9:45:42 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.

From: [billy langford](#)
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 22, 2024 10:39:58 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: [Sam Reece](#)
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 22, 2024 11:38:53 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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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.

Samantha Reece

From: [Jane Heimbichner](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, January 23, 2024 8:02:28 PM

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1 Why can't they leave islands of preservation in between their scorched earth destruction? Why does it have to be 100% bomb blast? Who created this scorched earth policy from hell! No mercy. Can't take it back. For shame on those who approved. Create instead a 50/50 where every 50 yards is preserved. The next 50 is taken and so on. Then come back in 10 years and do the other 50%. Or were they just too greedy to wreak full havoc and destruction on this habitat now? I can't believe this was approved. Why are we having to pay for this Mongolian cluster fuck? This is so wrong.

Dear Jane Dolan and Chris Lief:

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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: [Kathleen Cochran](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 24, 2024 6:42:32 AM

[You don't often get email from kmcochran11@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.

Sincerely,

Kathleen Cochran

From: [RYAN JACK](#)
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 24, 2024 2:29:44 PM

You don't often get email from rjack66@comcast.net. [Learn why this is important](#)

Dear Jane Dolan and Chris Lief:

I left you a voicemail message earlier.

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.
Ryan

From: [Jerry Jaggers](#)
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 24, 2024 3:54:35 PM

Some people who received this message don't often get email from jaggers@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.

From: [Kathryn Tedford](#)
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 24, 2024 9:31:10 AM

[You don't often get email from kathrynketa@aol.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.

Kathryn Tedford

From: [Catherine Vigran](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 24, 2024 11:43:14 AM

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Dear Jane Dolan and Chris Lief:

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Thank you.

Catherine I. Vigran, MD

From: [Shawna Anderson](#)
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 25, 2024 7:09:20 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.

From: [Greg Schmidt](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Subject: American River Proposed Tree Removal
Date: Thursday, January 25, 2024 9:21:09 AM

You don't often get email from gssempire@aol.com. [Learn why this is important](#)

Hello Amber,

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.

2 | This proposed removal is not only unnecessary, but also DESTROYS the natural
3 | 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: [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

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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 [Mail](#) for Windows

From: [Molly Sheahan](#)
To: [Woertink, Amber@CVFPB](#); [Lief, Chris@CVFPB](#)
Subject: Protect the American River Parkway at Watt Avenue
Date: Thursday, January 11, 2024 12:04:09 AM

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Amber and Chris,

I encourage your office to work with Sacramento County officials and the US Army Corp of Engineers to urge a more targeted, 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 a massive section on the American River Parkway for "bank erosion protection", east of Howe Ave to the Mayhew Drain.

1 This will remove more than 525 heritage oaks as well as entire walking paths and trails, resulting in the loss of wildlife habitat and beautiful recreational areas. I spent years of my childhood growing up in the neighborhood and walking behind Rio Americano HS along this precise trail, exploring nature, encountering deer and hawks and cranes, jumping in the river, finding shade in the trees on the hidden beaches. That beauty is irreplaceable.

2 Furthermore, studies show that native and mature vegetation can slow flooding while denuded bare dirt banks for the 2 years of construction, and immature, isolated plantings post-construction, will continue to put us at risk.

Please push for a less destructive, alternative method preserving stabilizing vegetation. I urge a solution that protects the wildlife, habitat, recreation, and beauty of this stretch of the river, while still pursuing the critical goal of protecting the county from flooding.

Thank you.
Molly Sheahan

From: Jenna Adrienne
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 10:43:05 AM

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Dear Jane Dolan and Chris Lief:

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Thank you.

From: [Jessica Wilson](#)
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 11:53:06 AM

[You don't often get email from jessica.wilson@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.

Regards,

Jessica Wilson

From: [Michael Wilson](#)
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 8:00:38 PM

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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.

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.

Michael Wilson

From: [Thomas Bowron](#)
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 18, 2024 2:27:13 PM

[You don't often get email from bowronthomas@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.

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.

Sent from my iPhone

From: [Eliza Morris](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please help make USACE data public!
Date: Thursday, January 18, 2024 7:28:03 AM

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:

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.

1 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.

2 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
3 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!

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 pictures and would be happy to give you more info. But you can also find a lot here:

www.americanrivertrees.org.

Warmly,
Eliza Morris

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Wednesday, January 31, 2024 7:04 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Urgent Appeal: Preserve the American River Parkway for Generations to Come - American River Common Features 2016 Flood Risk Management Project.

From: Joe Rombold <jwrombold@gmail.com>
Sent: Tuesday, January 30, 2024 3:06 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Urgent Appeal: Preserve the American River Parkway for Generations to Come - American River Common Features 2016 Flood Risk Management Project.

You don't often get email from jwrombold@gmail.com. [Learn why this is important](#)

Dear Respected Members of the US Army Corps of Engineers (USACE) and the Department of Water Resources (DWR),

I write to you today with a heavy heart, but also with a profound sense of responsibility, as I express my deep concerns regarding the lower American River projects detailed in the draft SEIS/SEIR, particularly Contracts 3B, 4A, and 4B.

This message is not just a plea, but a heartfelt call to action, driven by the love and passion I hold for the American River Parkway. It is a place that has been an integral part of my life since my family made the conscious decision to settle in our neighborhood back in 1969, allured by its proximity to the majestic American River. As children, my four brothers and I embarked on adventures along the river's edge, well before the development of the iconic American River

Parkway bike trail. Our love and respect for the natural world blossomed here, and as teenagers, we relied on the bike trail for our daily commute to school. Throughout our youth and into adulthood, the parkway has been a constant source of joy, providing us with countless opportunities for recreation and rejuvenation. It is a part of our very identities, and my greatest fear is that the proposed erosion project threatens to rob future generations of the same profound connection to nature that we have been so fortunate to experience.

1 My reservations about the "potential bank erosion" work are substantial, and I am deeply concerned about the proposed approach, which entails the clearcutting of banks over an extended period, followed by years of isolated, immature plantings. This approach, as it stands, appears to carry as much risk during high water flows as doing nothing at all.

The environmental analysis, regrettably, falls short of adequately addressing significant impacts, offering effective mitigation measures, or providing clear and accessible language for a broader audience beyond engineers. This lack of clarity and transparency leaves us unable to comprehend the full extent of what is being proposed, and it is unclear whether this ambiguity is intentional. 2 Under the California Environmental Quality Act (CEQA), it is mandatory that all feasible mitigation measures are considered, even if some impacts remain "significant and unavoidable." Sadly, the draft SEIS/SEIR does not meet this imperative, especially when it comes to exploring alternative, less environmentally impactful approaches.

Allow me to underscore my specific concerns, which include:

- 3 | 1. The potential disruption or closure of the American River Parkway bike trail.
- 4 | 2. The devastating loss of critical wildlife habitat.
- 5 | 3. The alarming removal of urban forest cover.
- 6 | 4. The disheartening elimination of spaces that are integral to our community's well-being.

I implore you with all the conviction in my heart: no action should be taken without the presentation of a more focused, less destructive alternative approach to Erosion Control Projects 3B and 4.

7 | Furthermore, I firmly advocate for robust public involvement through meetings before any further actions are considered.

The American River Parkway is not just a recreational area; it is the crown jewel of Sacramento. It continues to host over 8 million visitors annually, providing a sanctuary for individuals to reconnect with nature, with themselves, and with one another. The decisions you make regarding its future will leave an indelible mark on this invaluable treasure, affecting generations to come. It is imperative that these decisions reflect the utmost care and consideration that this natural gem deserves.

Thank you for taking the time to read and understand the gravity of these concerns. Your attention to these matters is deeply appreciated.

Sincerely,

joseph rombold

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Wednesday, January 31, 2024 1:32 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River Parkway destruction between Howe and Estates

From: tmccrystle@gmail.com <tmccrystle@gmail.com>
Sent: Wednesday, January 31, 2024 1:08 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River Parkway destruction between Howe and Estates

You don't often get email from tmccrystle@gmail.com. [Learn why this is important](#)

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 moved to the area in 1972, and have enjoyed the natural beauty and abundant animal, bird, and plant life in this area in my daily walks for years.

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.

1 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.

2 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:

3 Habitat destruction and disruption of the scenic splendor of the American River Parkway.

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: Monday, February 5, 2024 10:17 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Environmental Impact Report concerning Levees

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

From: Carl Allin <mcallin@comcast.net>
Sent: Monday, February 5, 2024 10:13 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Environmental Impact Report concerning Levees

I want to commend you on writing a report that is very comprehensive and very difficult to read and understand. I did read/look through much of the report, and I would say the terms "very little significant impact" stand out.

I doubt that there is that very little significant impact on the environment and the impact on the neighborhood has been dramatic. We can no longer walk on the levees because the stairs our neighbors had have been removed. Beautiful trees and landscaping paid for by our neighbors has been destroyed. And we have a significant homeless population that no one (agency) is concerned about enough to see that they are given housing away from the river which they are polluting on a daily basis—latrines built into the east side of the river, people building bon fires along the river banks, and trash not being picked up until the river washes it downstream.

1 | I would say, that on Page 134 where the report says there is no significant impact on a disadvantaged community by the Sacramento River, the homeless community now living there should be consulted. And nearby neighbors that are having to deal with the effects of the homeless living in their backyard and the need for security and lighting on a proposed bicycle trail is important and should be considered as an impact.

Sincerely,
Marleen and Carl Allin

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:25 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: Lower American River Projects

From: Charisse Hamm <joncharissehamm@gmail.com>
Sent: Monday, February 5, 2024 7:59 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Lower American River Projects

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. My family has resided in the Sacramento area for four generations. I am now a senior, and have enjoyed the beauty and wildlife of the American River for many years---as have countless others. **To destroy this natural landscape would be a tragedy to our community, city and state.**

1 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.

2 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:

- 3 | **1. Above all, this is an Environmental Justice issue!**
- 4 | **2. Destruction of trees creates hot spots, reduces air quality, and destroys natural habitats - all of which are already threatened by climate change and which have significant effects on our health.**
- 5 | **3. Equal access to nature and recreational activities - access to recreation in nature is decreasing as it is.** 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.
- 6 | **4. 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.
- 7 | **5. Impacts on wildlife and critical habitats.** Clear-cutting and rip rapped stream banks 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.

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.

Charisse M. Hamm

•

Sent from [Mail](#) for Windows

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:24 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Levee access

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

From: janice nakashima <writtenakashima@gmail.com>
Sent: Monday, February 5, 2024 6:55 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Levee access

1 | Please take down all private fences as they are questionably illegal, impede levee patrols, and prevent public access.

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:23 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Avery, William E <averyw@csus.edu>
Sent: Sunday, February 4, 2024 8:53 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.

The American River Parkway and its woods and wildlife are extremely valuable to me and to thousands of other people and institutions. The recreation and fisheries impacts of the proposed projects may literally impact millions - given the number of people who visit the American River annually.

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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

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

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

William E. Avery, Ph.D.
Emeritus Faculty, Biological Sciences, CSUS

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:23 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Public levy access on Audubon

From: Mary Auman <rosemaryauman@gmail.com>
Sent: Sunday, February 4, 2024 6:02 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Public levy access on Audubon

Hello,

I just wanted to say I do not want public levy access to be built on Audubon Ct. I've lived in the neighborhood for 20+ years and sadly I no longer feel safe letting my children play nor walking myself in the area due to an encounter with a homeless encampment. I feel like adding public access there will only make the issue worse.

Thank you for your time,

Mary Auman

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:20 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Family home on Clipper Way

From: IRENE YANG <ireneyang5050@gmail.com>
Sent: Sunday, February 4, 2024 4:27 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Family home on Clipper Way

- 1 | There are homeless tents along the waterfront and we are afraid.
It's unhealthy and they are trashing the environment and we are fearful!
We never saw that before and fear if something is not done more will find shelter there. What is being done???
- 2 | Also, we miss access from our property to the River and wonder as others are allowed in when will homeowners be allowed to put their steps back in?

Regards
Irene

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:19 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] SREL contract 3

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

From: Darlene Jeffery <resbydjeffery@yahoo.com>
Sent: Sunday, February 4, 2024 3:23 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] SREL contract 3

Hello USACE,

- 1 | As a long time home owner (30 years), I bought my home as a foreclosure, at which time there were many in the area, I have spent blood, sweat, tears and many thousands of dollars to make it my forever home. Over the course of the levee improvements, of which I realize were necessary for the safety of all. However as one of the home owners that live next to the levee the impact for the betterment of all is mostly felt by us. We have lost personal property (steps, landscaping, views, and actual sq footage of our yards) along with privacy, security, no easy access to our boat docks, plus loss of home values. We now have:
- 2 | Homeless camps and boats tied up to the newly installed planting benches, and are causing immense environmental damage, lack of enforcement that will result in further environmental degradation, removal of habitat, removal of trees and shrubs.
- 3 | I ask that a further study with more constructive plans be taken in consideration before moving forward.

Thank you,
Darlene Jeffery
Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:17 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Francesca Reitano <freitano@gmail.com>
Sent: Sunday, February 4, 2024 2:52 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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. This is a riparian woodlands that is close by, available for Sacramentans who cannot travel far in order to find peaceful respite, or lack the time and space in their lives for extended travel. When I was able to bicycle, the parkway was an important place to ride in nature, and I have gone on many walks with friends on various sections of the trail. Trees and green spaces are the lungs of our community's ecosystem, and our tree canopy has a measurable, important and crucial effect on our air quality, regional heat effect, and well-being.

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, but are not limited to, the following:

1. Limited evidence for unnecessary removal of trees and vegetation

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

2. 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.

3. Impact on wildlife and critical habitats is substantial and unnecessary

- 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

4. Loss of mental health benefits from trees, vegetation and green spaces

- 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.

5. Impact on 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.

6. Environmental justice, as the parkway is accessible to those with limited means to travel

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.

7. Cultural restoration and inclusion

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

8. 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.

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. Quite simply, much more should be done to mitigate the negative impacts of this project, many of which I believe are unnecessary and harmful.

Thank you for your consideration of my comments.

Francesca Reitano

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:16 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Draft SEIS/SEIR

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

From: Donald Murphy <donald.murphy.33@gmail.com>
Sent: Sunday, February 4, 2024 1:43 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Draft SEIS/SEIR

To Whom It May Concern:

I am writing to you regarding concerns about SRE Contract 2.

I live at 7260 Pocket Road and have a legally-permitted dock and gangway on the Sacramento River. The Central Valley Flood Protection Board, on behalf of the USACE, has demanded that I remove my dock and gangway by April 16, 2024 for the Erosion 2 Contract. I have agreed to do so.

In reviewing SEIS/SEIR I notice the mention of impact on dock owners in the Contract 3, but no mention of the dock owners in Contract 2. Please explain why the Contract 2 dock owners are not included and also provide any/all information regarding the impact on my property.

My property on the water side of the levee is full of foliage (bushes and small trees). I submitted pictures of this area to the USACE asking if the foliage would be removed for Erosion 2. The USACE representative informed me in writing that the foliage would be removed but couldn't tell me when. Since I have to remove my gangway and boat dock I need to make sure there is no conflict (equipment, personnel, etc.) with the removal of the foliage. Please inform me when the foliage will be removed.

I regret the Army's decision to remove the foliage which provides a natural habitat to many animals and birds. Is there any chance that this action will not take place? The construction phase of the project has already caused major disruption to the wildlife along the river. Of particular note are the nesting of bald eagles and Swainson hawks.

Please let me know the actual start date of Erosion 2. How many days will it take for the barge work and placement of rip rap? Will I be allowed to replace my dock and gangway as soon as the rip rap work is completed on my property?

Thank you for your attention. Looking forward to your reply.

Regards,
Don Murphy

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:14 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Sacramento River and possible future bike trail

From: Eugson Wong <euwong314@gmail.com>
Sent: Sunday, February 4, 2024 12:57 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Sacramento River and possible future bike trail

ARCF SEIS,

Please don't open up any more levee type bike trails to the public until you get the American River Parkway under control! This should not be a let's do it now and we'll deal with the problems later! We do not want to be ginny pigs! We want common sense!
EW

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:09 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Patrick O'Rourke <pworourke@gmail.com>
Sent: Sunday, February 4, 2024 11:14 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) 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 | My children play here daily and enjoy the exercise and wildlife provided by this stretch of the American River.

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:

Displacing wildlife

Ruining the esthetic of this area of the American River

Decreasing property values in the area.

Polluting the water with sediment and byproducts of construction

he 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.

Patrick O'Rourke

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:08 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Submitted Comment for Sacramento Contract 3 Work

From: Mark Portuondo <mportuondo81@gmail.com>
Sent: Sunday, February 4, 2024 10:11 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Submitted Comment for Sacramento Contract 3 Work

Good Morning,

- 1 Recent planting benches behind Zacharias Park in the project footprint have already witnessed significant destruction from homeless encampments. Further planting benches in the project scope will not only result in additional environmental degradation, but also provide access onto private properties, as the planting benches will be below the high water mark. What steps will the USACE take to ensure that planting benches do not become an open access area for homeless encampments, as they are going to be considered public?
- 2 Will the Corps allow extension of private property fences that currently end at the high water mark, to extend onto the planting benches? With removable panels?

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:07 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: Jon Grass <jjgrass@gmail.com>
Sent: Sunday, February 4, 2024 8:46 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR)
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. It is a source of recreation all throughout the year and a habitat that brings a special level of wildlife interaction to the urban core that is found almost nowhere else. The trees are integral to that.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

B Life thrives beneath the canopy and will not without it. Roots in the soil improve soil structure and its ability to infiltrate and retain water, and reduces runoff. As a result, the active, year round, biology makes the landscape more resilient to flood and drought, not less. Trees provide shade and shelter for an ever dwindling wildlife biodiversity which should be protected at all costs, they cool and humidify the air around them creating a more pleasant parkway for all especially as we continue to endure hotter and hotter summers. Removing the established canopy to wait another number of decades before it returns is insane, from the perspective of someone who lives near and uses the space. We use the canopy now and many of us don’t have decades to wait for it to return.

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.

Jonathan Grass

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:06 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] American River Proposed Levee Project

From: Dee Kayl <deejkayl@yahoo.com>
Sent: Sunday, February 4, 2024 8:39 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF@water.ca.gov
Subject: [Non-DoD Source] American River Proposed Levee Project

1 As 30 year resident owners of property on Rio Bravo Circle, we are dismayed and shocked at the proposed rape of the river and our Larchmont Park in the name of flood safety and levee protection.

Our levee was fortified with a slurry several years ago. No more squirrel holes to undermine the strength. A great fix without losing our Heritage Oaks, etc.

The proposed denuding of the banks and destruction of all the wildlife habitat seems extreme and would devastate the ecological balance and seemingly cause more harm than good. We're not biologists nor geologists or erosion experts; just extremely concerned resident citizens with common sense.

2 There's also the arguments that our property values will diminish and our pure enjoyment of living on the river will be lost.

Just because money has been made available for a proposed purpose doesn't mean that a project is a good option. There are many ways it can be spent to achieve the same end. Sometimes, it seems our government (all levels) justifies spending money - just because it's there.

Please reconsider this plan!!

Sincerely, Vincent and Diana Dangler

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:05 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF)

From: Emma <emmajvogel@gmail.com>
Sent: Saturday, February 3, 2024 11:14 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.

A I grew up in a house that backed up to the levee in River Park and I would be angry with myself for not trying to save the trees along any part of the American or Sacramento River. Not only is removal of 11 miles of trees endangering our native wildlife along the river but it is also getting rid of 11 miles of plant life that helps clean our oxygen. More and more it seems like we are heading the way of LA and its concrete jungle. I, for one, would hate to see the city I grew up in turn into just another treeless, soulless, ugly concrete city. We used to be the city of trees, these trees are part of Sacramento's heritage. Leave them alone and find another way to prevent this *potential* bank erosion.

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, but are not limited to, the following:

1. Limited evidence for unnecessary removal of trees and vegetation
2. Impact on wildlife and critical habitats is substantial and unnecessary
3. Loss of mental health benefits from trees, vegetation and green spaces
4. Impact on air quality
5. Environmental justice, as the parkway is accessible to those with limited means to travel

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.

Emma Vogel

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:04 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

From: Barbara Domek <barbjds@yahoo.com>
Sent: Saturday, February 3, 2024 9:52 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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. 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 YOU in your role as county supervisors, as well as members of the SAFCA Board. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

A My husband and I got engaged nearly 40 years ago in a beautiful, shady, wooded spot along the American River near Sac State, which has now been obliterated. We purchased our home specifically because it was within walking distance of the American River Parkway, where we often walk, jog, bicycle, bird-watch, photograph, and just relax in the natural riparian environment that is such a unique gem to this city. Our children grew up exploring this natural area right here in our own backyard, chasing butterflies, counting animal tracks, identifying birds, spotting wildlife in its natural habitat, and marveling at the natural beauty of this special place so unique to the city of Sacramento.

I urge you to protect this amazing and unique environment from further devastation, and use less destructive methods of flood control.

Thank you.

Barbara Domek

Resident of the College Glen neighborhood along the La Riviera Drive stretch of the American River Parkway in the City of Sacramento.

Rebecca Santos, RN

February 3, 2024

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

Thank you so much for soliciting public comments.

A

I had trusted that despite what I have read from experts regarding the actual benefits of maintaining the habitat at it is today, that the USACE must be correct in their planning and research. I believed this project to be an unfortunate part of the price we must all pay for allowing the continuation of global warming.

However, it appears that perhaps there is inadequate or faulty research in the plan that not only will destroy and devastate a treasured natural space, but may actually INCREASE OUR RISK of levee failure.

At this time my comments focus especially 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.

B

PLEASE, reevaluate the plan, BEFORE it is too late. Please consider all that David O'Connor, the Bureau of Land Management's Hydrologist for California and former senior hydrologist for the Bureau of Reclamation said in his comments that he made to you.

https://www.reddit.com/r/Sacramento/comments/1aewepl/comments_on_my_corps_of_engineers_plans_for/?share_id=PZWeOgeowtOYSHUbU2YQq&utm_content=1&utm_medium=android_app&utm_name=androidcss&utm_source=share&utm_term=1&rdt=41510

C

I have been literally crying and feeling ill in my stomach every time I cross the Tara O'Sullivan bridge (H street bridge). I have lived in Sacramento for 42 years and loved the river and the parkway. I have LOVED the parkway as a treasure and asset to our city and our community. Along the parkway, I have walked, run, biked, picnicked in the shade of the beautiful trees and swum in the river's waters. I have watched the seasons change every year as the leaves bud, then emerge, provide shade, and turn golden in the fall before the river is again glimpsed through the sculptured branches of the naked winter trees. I have thrilled at the sounds of the birds, nesting and raising their young in the trees. I have delighted in the wildlife that call it home.

Crossing the bridge made me feel the peace and relaxation of the beauty of the nature. Now today, I don't look. I cry. My stomach turns and my heart weeps. IF we don't absolutely need to destroy it, PLEASE SPARE OUR PARKWAY.

The American River Parkway is extremely valuable to me, indeed to all of us. David O'Connor's comments, so well stated, has given me hope that perhaps we can reevaluate and that perhaps the reevaluation may result in the sparing of our parkway.

His comments support my questions of whether this "potential bank erosion" work is necessary along this section of the American River. The clearcut, denuding of the banks seems likely to put us at higher risk of serious erosion, than leaving it alone. PLEASE consider any feasible alternative, some other potential type of support to the levees rather than the total destruction that is currently in the plan.

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:

This project

- D
 - May make us more at risk of devastating flooding.
 - Has not been adequately evaluated utilizing current knowledge and information.
 - Has not adequately evaluated the unintended consequences and mitigation of those consequences.
 - Destroys a beautiful parkway.
 - Clearcuts trees increasing the rate of global warming and thereby increasing the risk of catastrophic flooding.
- E
 - Destroys a major habitat for birds in the Sacramento region.
 - Destroys habitat for a wide variety of wildlife.
 - Would impact Sacramento's economy as a less sought after place to live.
 - Destroys natural environment that for many underserved children of our community is the only access to what has evolved into a natural environment.
- F
 - Expands or increases environmental inequality.
 - Reduces the availability of children's exposure to nature and green space which research suggests has a disproportionate effect on children resulting in long-term developmental consequences including serious physical and psychological health ramifications.
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3162362/> and Kellert SR. *Building for life: Designing and understanding the human-nature connection*. Washington, DC: Island Press; 2005
 - Significantly increases the community's stress level by not providing the benefits of the current natural environment.

The US Army Corp of Engineers 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.

PLEASE DON'T DESTROY THE "CROWN JEWEL OF SACRAMENTO" without having looked at every feasible alternative. This project as proposed, once completed CANNOT BE REVERSED. This treasure is irreplaceable. This loss will have negative consequences upon all of our lives, our children's lives and their children's lives.

This decision is monumental. The responsibility of this decision belongs to ALL of us. We are all stewards of our American River Parkway treasure. It's future is in all of OUR hands. The ability to comment is MY responsibility. The thorough, careful, evaluation utilizing current knowledge and assessment capabilities is YOUR responsibility. This is too important. Together, WE MUST GET THIS RIGHT.

Respectfully,

Rebecca Santos RN

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:03 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments to USACE

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

From: Barbara Allman <allmanbarb@att.net>
Sent: Saturday, February 3, 2024 6:59 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments to USACE

1

I continue to be amazed at property owners in the Pocket who believe they have the right to own parts of the levee. You will be gettng comments from some of them about the negative impact they have experienced as a result of levee improvements. Open access should implemented. No steps, stairs, gates, no trespassing signs, etc.

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Larry Cox <elaurens.cox@gmail.com>
Sent: Saturday, February 3, 2024 5:07 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

It has been brought to my attention that there is a plan afoot to alter the banks of the American River at certain locations for the purpose of improving resistance to flooding and erosion.

I used to bike down the American River at least once a week for a number of years. I am not aware of any major portion of the river between Folsom and Sacramento that is not covered by mature vegetation - often forest - or public parks. I have noticed no particular erosion concerns outside of perhaps the cliffs below Fair Oaks.

My conviction in these matters is that mature vegetation offers the best protection against any sort of damage that could be caused by excess water in the river or flowing into the river. I don't understand why any mitigation effort would include the removal of mature vegetation. This seems to me the utmost in folly and I hope it is NOT what any of the agencies involved plan to do or will agree to.

1 Like many others, I cannot afford the time to fully inform myself of all the details regarding this issue. But I do know that the levies have been there for decades and as far as I know have never failed us, as they exist in their current form. They do result, however, in the river being "channleized" to a certain extent, without a proper flood plain to absorb excess flows. But we do have dams and reservoirs upstream to serve this purpose. So I really don't understand the need for this intervention.

2 This section of the American River is VERY heavily used by the surrounding community. I trust they will not let you get away with actions that are destructive. I am sure that some of them have studied this issue more thoroughly and can

present more exact information regarding the details of the planned intervention. I am merely adding my voice to support the lowest possible level of impact on the river banks and the natural community that lives there.

Sincerely,
Larry Cox
Sacramento

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 8:00 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Bryan Neff <bneff@gmail.com>
Sent: Saturday, February 3, 2024 3:29 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

A I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. As a citizen of Sacramento, I enjoy the parkway and all that it has to offer, while I also live in the floodplain this work is designed to protect. However, the proposed work is antithesis to modern flood protection design; it is antiquated and outdated. The proposed work will cause irreparable harm to the parkway, the flora and fauna, and the river itself. Further, the proposed work is entirely unsubstantiated and unjustified. Making these changes will permanently damage the river and its surrounding environments, lowering the quality of life for those who live in the Sacramento region.

The proposed approach to “potential bank erosion” along this section of the American River is to clearcut, backfill with rock, then plant immature plantings. These methods will devastate the existing trees in the area, including some that are 250 years old. These trees and other plants have existed long before our developments and have withstood centuries of flooding and erosion. This soil is held together by existing plant roots along the banks, which exist as complex plant communities, that holds the soil together, prevents erosion, and provides a stable riverbank. This environment also provides valuable habitat for aquatic and terrestrial species, promotes healthy ecosystems and riparian habitats, and naturally increases the water quality. The proposed approach will remove the roots of native riparian plant species, undoing the natural system and putting an inferior system that promotes erosion in its place.

The plan does not strike a balance of addressing potential bank erosion concerns with maintaining a healthy environment. I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

- B - Limited evidence for unnecessary removal of trees and vegetation
- B - The current risk of erosion is low: experts disagree about the erosion risk, but generally concluded that erosion resistant material was present and significant
- C - Proposed riprap will permanently alter the shoreline and destroy riparian environments
- C - The proposed approach will negatively impact wildlife and critical habitats, including those of native fish and birds
- D - The work would have both a temporary (2 years) and permanent significant negative effect on recreational use of the parkway and its recreational amenities
- E - The work will have a detrimental health effect both during construction and by permanently altering the environment

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.

Bryan Neff
Resident of Sacramento

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 7:59 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Barbara Domek <barbjds@yahoo.com>
Sent: Saturday, February 3, 2024 1:52 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

A The American River Parkway is extremely valuable to me. My husband and I got engaged nearly 40 years ago in a beautiful little wooded thicket along the parkway near Sac State that has now been obliterated. We bought our home specifically to be within walking distance to the natural beauty and wildlife

environment of the American River Parkway. Our children grew-up exploring the beauty of the flora and fauna of this unique and precious jewel of Sacramento.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

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

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

- Destruction of vegetation worsens the heat island effect.
- “Access ramps” will destroy additional trees but were not accounted for in the draft SEIS/SEIR.

2. Rip Rapped streambanks present significant negative consequences:

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

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

- Experts disagree about the erosion risk along this stretch of the river. More empirical data was recommended, but generally concluded that erosion resistant material was present and significant scour below it was not anticipated. Seepage data show no issue for seepage, especially after the deep slurry walls were added inside the levees.
- 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 environmental analysis.

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.

Barbara Domek

Resident of the Glenbrook neighborhood along the La Riviera Dr. stretch of the American River Parkway, between Howe and Watt Avenues

[Sent from Yahoo Mail for iPhone](#)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 7:57 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Frank Pribus <frankpribus@hotmail.com>
Sent: Saturday, February 3, 2024 10:32 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) 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, jog, and ride my bike most every day on the American River trail as I live within walking steps from the levy. Since working from home the past 4 years, I spend my breaks along the river to destress by enjoying the wonderful views and peace that nature provides. I am

1 a bit puzzled as to why exactly this project has been initiated. There
has to be another way. Removing this amount of trees will be
devastating for nature, wild life, and recreation for nature goers. Is the
project really necessary? I am not really sure who or what extent is
the erosion really in play? I just don't see enough environment
2 studies, validating the need for this erosion project. I've walked
biked to many parts of the river, and it seems fine. The analysis of
alternatives for a much more surgical, fine-grained approach (with
less environmental impacts) are not presented.

Thank you,
Frank Pribus.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 7:56 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: Extension of public comment period for American River Common Features 2016 Flood Risk Management Project

From: Harman, Jerilyn <Jerilyn.Harman@cdcr.ca.gov>
Sent: Saturday, February 3, 2024 2:49 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: [Non-DoD Source] Extension of public comment period for American River Common Features 2016 Flood Risk Management Project

We are the Harman family residing on 670 Riverlake Way. We own a double lot that extends out under and past the water line of the Sac River. Amongst the countless concerns we have already experienced from foot, bike, motorcycle, car, and truck traffic across our backyard, one more significant issue is pressing.

- 1 Please, let us not ignore the fact that the unhoused are coming. They are going to have relative privacy on our property, unless it gets crowded. They will bring with them debris, human waste and fire. They will alter the slope on the water side. As of this date we still cannot fence either land or water side of the levee. Let the American River stand as an example of this reality.
- 2 How are we to manage unwelcomed guests?
Who will manage the waste?
Are our dogs not to use their own backyard due to liabilities?
In normal situations, we are responsible for injuries and damage to our property. Still so when we can't control open access?
- 3 We need to know who our support resources are to prevent confrontations and to preserve our rights as liable property owners.
We didn't ask for or sign up for this. We don't want or deserve this exposure.

Jerilyn Harman RN



From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 7:52 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Erosion control project

From: Robert Grow <rdgrow@gmail.com>
Sent: Friday, February 2, 2024 5:44 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Erosion control project

This is my comment on the proposed Corps of Engineers erosion control project on the south bank of the American River upstream from Watt Avenue to around the northeast corner of Larchmont Park. I think this is Contract 3B and maybe some of 4B.

The river bank in this stretch is characterized by mature trees and underbrush that provides wildlife habitat. Some of the oak trees are large and probably quite old. Many trails have been established through use, giving access to the river at several points. Fishing, walking, boating and swimming are among the human uses.

In places there is not much bank between the river and the levee, while in the middle of the project area the width may be 50 yards or so.

I have been using this stretch of river bank for over 40 years and enjoy its wild nature, The project would, as I understand, take out the wild landscape and replace it with an engineered bank; this for the purpose of protecting the levee from erosion during high flows.

Like many of my neighbors, I would prefer that the river bank be left as it is. However, if engineers say the levee is at risk and the project must go forward then I would suggest the following:

1. Save the big oaks wherever possible.
2. Replace removed vegetation with native plants, including black walnut.
3. Make a trail along the river, perhaps at about 15,000 cfs height.
4. Leave the Larchmont Park tennis courts open.
5. Leave the clay banks in place.

Bob Grow

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 7:51 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: Sacramento District Contact Form: SEIR/SEIS re C3B and 4-need more information and revisit of plan

From: Bruton, J Paul CIV USARMY CESPK (USA) <Joseph.P.Bruton@usace.army.mil>
Sent: Friday, February 2, 2024 3:27 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: FW: Sacramento District Contact Form: SEIR/SEIS re C3B and 4-need more information and revisit of plan

Public comment below

Subject: Sacramento District Contact Form: SEIR/SEIS re C3B and 4-need more information and revisit of plan

CAUTION: Your email client may display clickable links. The data in this email is provided without modification, as the user entered it. Before you click or use any link provided in this email, please confirm the authenticity of the link.

This message was sent from the Sacramento District website.

Message From: Cary Hart

Email: chart1217@comcast.net

Phone:

Response requested: No

Message:

- 1 | No way to tell what exactly is planned for erosion control or for mitigation from the tiny blurry maps you have provided. Please send ut new maps and more information for public review. I have grave reservations about what I think the present plan is. Flow and seepage studies suggest the destruction of vegetation and trees along the river bank in this part of the river are not indicated.

Ref Id: zMWGYeqdQEYrtE82mT1jMw

February 2, 2024

To the U.S. Army Corps of Engineers, Sacramento District and the California Department of Water Resources:

1 The December 2023 **Draft Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report XIV** for the **American River Common Features, 2016 Flood Risk Management Project** in Sacramento, California states that except for the No Action Alternative, short-term impacts on biological resources generally range from *moderate but less than significant with mitigation* to *significant but unavoidable*, while almost all long-term impacts on such resources would be reduced to *less than significant with incorporation of mitigation*. But what do “short-term” and “long-term” really mean?

2 The document states that at locations on- and off-site of the study area, USACE will restore 301.2 acres of riparian habitat, 70.89 acres of elderberry shrubs, 75 acres of upland habitat for the giant garter snake, and 20 acres of in-stream habitat for green sturgeon including fish passage and replant 82,325 linear feet (15.59 miles!) of shaded riverine aquatic habitat. That’s very nice, but in the meantime, until all that habitat has been successfully restored and has had time to mature, what exactly are the “temporary” impacts on aquatic and terrestrial species in the area? One cannot assume that resident wildlife will just move to adjacent habitat upstream or downstream, because that habitat may already be fully occupied. For other species, habitat fragmentation and/or the disruption in habitat connectivity may be more than they can overcome, no matter how short the disruption, and thus such disruption would constitute a long term significant impact. How long will it take for the mature trees and other mature vegetation required by some bird species to become functionally reestablished? And what is the probability that some of the less common native plants in the area, unlikely to be included in any planting or seeding scheme, will successfully reintroduce themselves on their own? In short, “short term” can mean very different things for different species, and the document should disclose, based on the best currently available scientific data, not merely on wishful thinking, for how long a “temporary” impact on each species can last before it becomes permanent and significant. (An analogy: If people who lost their homes in a forest fire are able to rebuild a few years later, is it correct to conclude, albeit after the fact, that the short-term or the long-term impacts of the fire were “less than significant with mitigation”?)

Species that I have observed in the areas along the American River that would be affected by the Proposed Action include bald eagles, white-tailed kites, various other raptors, owls, California quail, great blue herons, great and snowy egrets, green herons, and kingfishers as well as beavers, river otters, white-tailed deer, coyotes, and, on one memorable occasion in 2023, a bobcat (and no, it was not just a large housecat but unambiguously a bobcat!). Of the nearly 400 plant species in the American River Parkway that I have personally identified, almost 50% are native to the Sacramento region. Especially noteworthy plants include pipevine, host to the caterpillars of the pipevine swallowtail butterfly, two species of milkweed (*Asclepias speciosa* and *Asclepias fascicularis*), host to the caterpillars of the monarch butterfly, and majestic valley oaks. While most of these species, animals as well as plants, lack legal protection, there is much to be said for the concept of keeping common species common. May I respectfully remind the USACE and its non-federal partners that the passenger pigeon too used to be common?

3 Furthermore, the USACE blithely assumes that *of course* its mitigation actions will succeed, but as other recent projects along the Lower American River clearly demonstrate, mitigation is not always successful. To give but two examples: Most of the numerous pole cuttings planted along the river’s edge in 2022 at Effie Yeaw Nature Center, intended to provide shaded riverine aquatic habitat, are dead. And while at Cordova Creek the willows planted along the creek in 2015 as part of the Cordova Creek Renaturalization Project have done spectacularly well, most of the upland trees and many of the shrubs have failed. What is USACE’s Plan B if its initial habitat restoration plan fails? Does USACE have a Mitigation and Monitoring Plan (or Proposal)? A few times the document

refers to measures such as “Mitigation Measure PLANT-1” or “Mitigation Measures VEG-1 and VEG-2”; but at least this reader has unable to discover in the document’s 939 pages just what such mitigation measures actually entail and how their implementation and success would be monitored. Regardless of whether public review of an Mitigation and Monitoring Plan is legally required or not, the public ought to have the opportunity to review and comment on the details of whatever mitigation is proposed for a project of this magnitude in an area recreationally highly valued and biologically highly valuable.

USACE conveniently hands off long-term operations and maintenance to other agencies, not something, I believe, that it generally allows applicants for 404 permits to do, and USACE frequently requires such permit applicants to guarantee that restored habitats will be successful in perpetuity and without further human intervention. I realize that not all of the proposed mitigation is subject to Section 404 of the Clean Water Act; nonetheless, USACE should adhere to the spirit of our environmental laws and regulations, not only the letter, just as it requires others to do.

4 Lastly, may I say that USACE’s public outreach efforts, as described in Chapter 2 of the DEIR/DEIS, while legally adequate, have not been very effective. How many people still read newspapers, much less the legal notices? Notifying local residents is all very well, but according to the American River Parkway Foundation, the Parkway gets 8 million visitors per year. I live a few miles away from the section of the Parkway that would be affected by the Proposed Action, have been visiting it at several times weekly for several decades, and not once have I seen any kind of notification advising the public about the Proposed Action posted at any of the various access points I use. (In contrast, when in the early 2000s the California Department of Water Resources proposed a project that would affect recreational fishing along a southern California creek, it placed notices at every developed fishing access. More recently, the public agencies implementing various in-stream salmonid habitat improvement projects in the Lower American River have generally posted attractive, well designed notices near the work areas explaining the project in easily understandable language.)

5 The American River Parkway, in its current state, consists of generally disturbed vegetation that nonetheless has a diverse flora with substantial native elements and that has stabilized enough to provide shaded riverine aquatic, other riparian, and various types of upland habitat for many animal species. Those portions of the Parkway where earlier phases of the Proposed Action have already been implemented have, at least “temporarily” and in all likelihood for a decade or two or more, been severely degraded. If for public safety reasons the Proposed Action must indeed be implemented and the No Action Alternative is unacceptable, then the CEQA/NEPA document should at least acknowledge the uncertainty of many of its true short-term and long-term biological impacts.

Respectfully submitted,

Dr. Eva Begley

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 2, 2024 1:49 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] American River flood project/levee

From: Ramona Blount <RB4Christ@yahoo.com>
Sent: Friday, February 2, 2024 12:39 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PubliccommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River flood project/levee

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

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

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

The American River Parkway is extremely valuable to me.

A | I have enjoyed the beauty of the parkway, so close to my home for 40+ years. I have spent many hours at the rivers edge, or running along the bike trail, or cycling from Sacramento to Folsom Lake. It is devastating to see the loss of the trees they have already taken out but to think that they are going to take out an 11 mile stretch of this beautiful landmark is unconscionable.

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

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, but are not limited to, the following:

1. Limited evidence for unnecessary removal of trees and vegetation
2. Impact on wildlife and critical habitats is substantial and unnecessary
3. Loss of mental health benefits from trees, vegetation and green spaces
4. Impact on air quality
5. Environmental justice, as the parkway is accessible to those with limited means to travel

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.

Ramona Blount

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 6, 2024 10:30 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Environmental Impact of the Levee Projects

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

From: billyannG <billyannG@comcast.net>
Sent: Tuesday, February 6, 2024 12:24 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Environmental Impact of the Levee Projects

1 I own private property on the levee and the recent levee work impacted the ability for me to access my backyard property, including my boat dock, because my stairs were removed and a steep slope was erected by heavy equipment. I had to use a boat in order to access my boat dock to secure my yacht in storms.

A batch plant was constructed in my front yard. Towards the end of the project, the front gate was left open and people were entering my yard.

When the work was completed it gave access to others to use the levee. I witnessed a small car driving on it. I observed many more people walking and bicyclists riding on it than in the past. The noise factor was disturbing when I was working in my yard.

2 A homeless encampment was started in the backyard on my neighbors property

Someone shot very loud fireworks from the levee into the river near the forth of July. Dogs were barking at all hours of the night.

3 Coyotes were seen during the day because they lost their natural habitat.

4 There were several instances of vandalism, that I reported to the Sacramento Police Department, to my temporary permitted cross levee fence.

People shouted at my family claiming that the levee is public property as they threw the No Trespassing Private Property signs down toward our house.

Billyann Groza

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 6, 2024 10:29 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] USACE/SAFCA/CVFPB/DWR Levee work

From: robind@protonmail.com <robind@protonmail.com>
Sent: Monday, February 5, 2024 11:12 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] USACE/SAFCA/CVFPB/DWR Levee work

To Whom It may Concern:

1 I am opposed to current proposal (3B) and bridge, when last studied, would destroy acres of prime riparian habitat in the American River Parkway. This area of the Parkway preserves some of the last remaining 5% of distinct and critical habitat in California. It would cut through the heart of the greatest old growth riparian forest anywhere near Sacramento. Because this type of forest is green all summer when much of our other native vegetation is golden and resting, it's a magnet for wildlife and far more significant for providing them prime habitat. There is a bald eagle nest that needs protection, also many wild animals, green herons, wood ducks, spawning beds for fish, etc.

The 3b proposal is to remove 500-700 100 year old trees. According to testimony at the last on-line meeting by a geologist, there is more erosion on the levees after the trees and grass are removed. The trees actually hold the earth together. Rip-rap is not acceptable. Homeowners have not bought houses near the river to have the river lined with rip-rap. During construction, access to the bike trail will be blocked. Many people use the bike trail to bike to work everyday.

The American river is a jewel of Sacramento and must be preserved for future generations.

2 **There are much better options for improving transportation for autos, light rail, bicyclists, and pedestrians in the immediate area.** A little more than a mile upstream, four bridges cross the Parkway on State Route-160. Caltrans' studies found that one of the bridges needs to be replaced and the other three require major rehabilitation. Existing bridges and infrastructure should be upgraded and maintained before considering an option with devastating impacts to our River and Parkway.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 6, 2024 10:28 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: k g <justgottaknow@prodigy.net>
Sent: Monday, February 5, 2024 9:16 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.

I recently went on a walk with the California Native Plant Society along the river because I wanted to see what could be lost if these upgrades are done in the destructive way that I have been shown. I got to bond with some older members of my community, who taught

me how to identify plants through sight and smell, and they were so excited to tell me all they knew of Californian ecology. While we walked, we were met with bikers, runners, dog-walkers, birders, and fishers; many of which we exchanged "good mornings" with. This Parkway is not just important for its wildlife, but also the community and recreation it fosters. In my whole life living in California, I never visited a place with so much greenery as that Parkway; I never even knew such a place existed in Sacramento County, I'd only seen such places on road trips through other states like Oregon. I plan on staying in California because this is the state I love, and because of that I want it both safe and beautiful. I hope we can work on a way to secure the levee as well as keeping such a beautiful environment alive.

I understand that with Climate Change seeming inevitable, we need to do the infrastructure we can to keep Californians safe, I am writing to you because I want to protect trees but protecting people is also extremely important to me. So I worry that with the loss of the American River Parkway habitat, we may open ourselves up to other environmental issues such as decreasing air quality, heat due to lack of shade, erosion, and decreasing soil health. I am a Sustainable Agriculture major, I am by no means an expert and only receiving my AS this year, but those of us in the agriculture industry are becoming more aware of the need to protect soil health, which plant life is necessary for. Without plants, the sun will beat down on the soil and dry it out quicker, along with the wind which will also pick unprotected soil up and carry it away elsewhere, and without plant roots the soil will more easily be carried away by water. While I do trust that you all are working to decrease erosion, I worry that by fixing one form of

erosion, which isn't currently posing a huge problem, we will create many more outlets for erosion to occur.

I would like to see an approach to flood protection that considers a wider range of factors in erosion, if there is a way to upgrade our flood protections without as much destruction, and considers the erosion and flood protection we already have with plants, I think it is necessary in this situation. We need to cooperate with nature, and do **more targeted** and **less destructive** methods of erosion control. Thus, I request you perform a more adequate environmental analysis of the proposed projects **as well as** the subcomponents of Contracts 3B and 4, until said construction methods are found.

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 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.

Kilee Grob

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 6, 2024 10:26 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: mlbccd@comcast.net <mlbccd@comcast.net>
Sent: Monday, February 5, 2024 5:15 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.

The American River Parkway and its woods and wildlife are extremely valuable to me and to my family. The area slated for destruction between Howe and Watt Avenues contains irreplaceable heritage oaks along the American River bank, a large flood plain with giant shade trees, and a levee near homes and streets. These huge trees and root systems already prevent erosion. They've been through many high waters and are still holding the bank together. I do not support the devastating methods being proposed to address potential bank erosion concerns.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees.

Advanced

modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

Sincerely,
Marcia Berner

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 6, 2024 10:24 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Feedback on Draft SEIS/SEIR American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report XIV, specifically the ...

From: G. Mills <gerald.e.mills@gmail.com>
Sent: Monday, February 5, 2024 4:37 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: Mer Mills <mermurf@yahoo.com>
Subject: [Non-DoD Source] Feedback on Draft SEIS/SEIR American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report XIV, specifically the Sacramento...

Attn: Mr. Guy Romine,

We would like to provide feedback on the American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report XIV, specifically the Sacramento River Erosion Contract 3.

1 We want to support the continued work to reinforce the levee; at the same time we continue to pay property taxes on our home and property that continues to be degraded by the work being performed with no action by the agencies responsible for doing the work. We are concerned our property will continue to be damaged with no response and or accountability from the agencies doing the work. Our property was damaged during the SREL Contract 3 (Seepage/Stability) work, and we filled out the forms to have the damages rectified but have not obtained any further communications from the U.S. Army Corps of Engineers - Sacramento District.

The last communication we have from the core was on 10/6/23 and is quoted below, we have sent multiple follow up emails in the past 4 months with no reply.

"The head of construction on the project has signed your damage concern packet and it is on to the next phase in the process. The last thing we have to do is run it through our legal department to make sure everything is in order. The project manager is working on that now.

Once we get the go-ahead from legal, we'll transfer your packet to our non-federal sponsors at the Sacramento Area Flood Control Agency (SAFCA) who will be the one's working with you on a resolution.

I will let you know as soon as we transfer you packet to SAFCA.

Luke Burns

Senior Public Affairs Specialist

U.S. Army Corps of Engineers - Sacramento District

1325 J St. - Sacramento, CA 95814"

2 Our concern is that the additional work will likely damage the property for which we pay taxes to use and will require us to lose access to the waterway that we pay our taxes to be able to use. We are also concerned for the wildlife that uses the land for which we pay taxes to use. The owls who live in the trees that use our facilities to drop their pellets, as well as the beavers who eat and often frequent the river area behind our house. We have captured these visits on camera and video and it's truly awe inspiring.

Can the U.S. Army Corps of Engineers please help us help you by allowing us to maintain our property as it is today? Can we receive a waiver to keep our property as is and have the contractors work around our property? Can we also have our previously communicated damage resolved?

Thanks,

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 2:57 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: SREL Contract 3 SEIS-SEIR Comment
Attachments: Zacharias 2.jpg; Zacharias 3.jpg; Zacharias 1.jpg

From: Ryan Bogle <rbogle@boglewinery.com>
Sent: Monday, February 5, 2024 2:17 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] SREL Contract 3 SEIS-SEIR Comment

To whom it may concern,

I live along the Sacramento River in the Pocket neighborhood of Sacramento and will be directly impacted by SREL erosion contract 3. While I respect and appreciate the work being done to maintain the levees, I believe that the habitat component of the erosion project will do more harm than

1 good. Since project 1 has been completed the planting benches which were completed in October of 2022 have been turned into homeless campsites. In the small ½ mile segment of planting bench that was installed along Riverside Blvd to Zacharias Park, there are no less than 4 campsites 3 of which have been abandoned with an ecological wreckage left behind (see attached photos). By creating these shelves along the length of the river in a city such as Sacramento, the homeless will move in as soon as the waters recede. Any biological habitat benefits will be nullified within weeks and we will have a situation much like the American River Parkway, where fires, human waste, and levee degradation are commonplace. While these planting benches are surely beneficial in theory, when implemented in stretches of highly populated areas where there is a documented homelessness crisis, I believe they are a net negative for the ecosystem.

Thank you for your work,

Ryan Bogle



Ryan Bogle | Vice President

916-744-1139 x105 | rbogle@boglewinery.com

49762 Hamilton Road, Clarksburg, CA, 95612

boglewinery.com | phantomwine.com | juggernautwines.com | twentyacreswine.com



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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 2:58 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

From: Annette Faurote <aafaurote@gmail.com>
Sent: Monday, February 5, 2024 2:41 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

Dear Us Army Corps of Engineers & Department of Water Resources Comment Recipients:

My comments pertain to the Lower American River projects of the draft SEIS/SEIR environmental analysis.

I am extremely concerned by the planned work as currently outlined. I have a great number of concerns:

- 1 -This project is disastrous and destructive; OVERKILL. We need to find a gentler method of strengthening any problem areas. We need more work on finding any weaknesses. Then we need to spot treat any problem areas.
- The National Park Service has worked on levee and flood-proofing in a much less destructive manner (i.e. using smaller earth movers, and other gentler techniques). ALTERNATIVE METHODS MUST BE THOROUGHLY CONSIDERED. NO ALTERNATIVES WERE SUGGESTED IN THIS PLAN.
- 2 -The maps presented to the public are too small to see accurately.
- A balanced approach must be considered. Balancing the integrity of a natural ecosystem with extreme repair methods. PROVIDE ALTERNATIVES! HAVE THE ALTERNATIVES PEER REVIEWED.

-More analysis must be done. There are experts that disagree with the proposed work. The design of this project needs reevaluation. Greater environmental analysis needs to be done.

-This is a Wild and Scenic River; an incredibly special area. It is a source of joy and health for thousands and thousands of local residents. The proposed work would destroy this quality.

-The proposed project would destroy important habitats. Habitat loss is the main reason for wildlife and bird decline. This is habitat destruction to the extreme...scorched earth type destruction. Yes, there is proposed mitigation. But it is not at all near equivalent. A measly poor quality mitigation at best. The area will NEVER return to what it is today. BE REAL.

-Hundreds of beautiful OLD oaks (100-200+ years old) would be destroyed. Oaks are keystone species and protected in California. Unbelievable that this is even considered. And some are killed for ramps, parking, etc. Parking and access is not an excuse to kill 150 year old trees.

-With trees and riparian habitat torn down the River will heat up endangering the salmon; a currently very stressed population of salmon. Salmon need cool waters to thrive.

-A home next to the American River is valuable. After this destructive work home values will drop. I paid extra 2 years ago to live along the River.

-The recreation of thousands and thousands of people in Sacramento will be compromised. Trails without trees and vegetation will become hotter and unbearable for much of the year. Who wants to ride/walk through a destroyed area devoid of plants? NO ONE!

-Natural areas are a necessity for mental health. I moved next to the River so that I could recreate here daily. The destruction of the River environment keeps me up at night and is already causing me extreme anxiety and stress. If it is gone...I just don't know...it is the saddest thing possible. Other residents will feel this huge psychological damage as well.

-This is a straight section of River. It does not justify this kind of work. Velocities of each area should be considered. Levee work should be looked at in spot manner dealing with potential problems only.

-Trees have been considered important in maintaining banks. The data is mixed and says removing the trees is better.

The American River is not just a flood job to get done. It is the home to an amazing natural community. Animals that need a home and place to be. It is the home of thousands of Sacramento residents. Residents that need this green space for their health and sanity. Yes, we need targeted work, carefully peer reviewed with greater analysis. But we don't want, don't NEED this project as proposed.

Sincerely,
M. Cobbold

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 5, 2024 12:04 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Sacramento Levee Project

From: David Gunther <davidtgunther@gmail.com>
Sent: Monday, February 5, 2024 11:43 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Sacramento Levee Project

To whom it may concern,

1 Thank you for allowing the public to address concerns regarding the Sacramento River Levee project. I am a resident who's home backs up to the levee in the Greenhaven/Pocket neighborhood in Sacramento. I am an avid cyclist and runner, and after having seen what has become of certain sections of the River Parkway along the American River where homeless have taken over public spaces and trails, and sections of the Sacramento river south of the Water Treatment Plant on the south end of the pocket and now south of Zacharias Park behind Clipper Way with homeless encampments popping up there, I fear for the safety and security of not only the residents who's homes back up to the levee, but also for the wildlife that this section of river hosts.

2 I live along Surfside Way and the project has already been completed behind my house but it has altered the landscape of our property for what will no-doubt be the rest of my lifetime. We had 2 old-growth Oak trees in our back yard that provided shade and sanctuary for various wildlife, and one of the trees was cut down to make way for a new staircase for the city pump station that is located next door. Not only was one of the old growth oaks removed, but a 10-foot tall chain-linked fence was erected on top of the levee behind my house complete with razor wire that surrounds the pump station valves located on top of the levee.

3 Due to the fact that the city sees the need to protect it's asset with 10-foot tall chain-linked fence and razor wire, but homeowners are limited to a 6 foot fence to protect our back yards, I would very much like to see permanent gates across the levee to keep the public out and protect wildlife habitat and residential private property from homeless encampments and the negative impacts those encampments have.

If flood control is the first priority, and after seeing the amount of trash and garbage one little homeless encampment generates, it is only logical to erect cross-levy fences to keep homeless encampments off of the levee shelf to minimize the chance of their trash ending up in the river and/or accumulating on the shelf to create a downstream hazard when water levels get high.

Thank you for your consideration.

Dave Gunther

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 6, 2024 7:20 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Tree removals along Howe/watt

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

From: pammyjan@gmail.com <pammyjan@gmail.com>
Sent: Sunday, February 4, 2024 9:17 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Tree removals along Howe/watt

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

The prospect of you ruining the American river parkway along this area between Howe and Watt is very disturbing. As you have ruined all the trees and natural landscape along the j street bridge to paradise beach. Your landscape designers have no Asthetics ability to make a beautiful natural area look natural. You plant trees and bushes Like it is an orchard all equ equidistant

1 from each other. Then not allowing for a natural foot path to take place. The J street bridge area looks barren and the best we can hope for is A prograded park situation treeless, Instead of a natural area that is a beacon of natural beauty for both Sacramento residents and visitors. This area of out American river parkway has existed for 70 years at least with a couple floods and withstood. Continued talk about drought as well should encourage you to keep the beauty of the trees that give us oxygen and house the birds and animals. The damage that your workers creat along the river is a problem as well. If we could see your were mitigating and creating I future natural beautiful habitat without the disruption. But the removal of hundreds of trees of beauty and oxygen is criminal. Your unnatural planting schemes are pathetic. You have blighted the area by J street bridge probably forever. Please stop with the tree removal! And get a landscape architect that has natural scenic skills. Please!!!

Pam kennedy
Riverpark

Sent from my iPhone

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 6, 2024 7:26 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Please Insist on a Better USACE Proposal for American River 3B Project SAVE OUR PARKWAY

From: Christie Vallance <christiev44@gmail.com>
Sent: Saturday, February 3, 2024 10:57 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Please Insist on a Better USACE Proposal for American River 3B Project SAVE OUR PARKWAY

You don't often get email from christiev44@gmail.com. [Learn why this is important](#)

As a homeowner in this region, I am writing to ask that you to persuade the US Army Corp of Engineers to perform a MORE **TARGETED and LESS DESTRUCTIVE** approach to Erosion Control Projects 3B and 4.

Have you seen the destruction near Sacramento State and Howe Avenue?

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. Protecting this wildlife corridor is of utmost importance to me. Please the project to move forward in a more intentional and less nature destructive way as we have seen from the recent work near Howe Ave. and Sacramento State.

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

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!

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.

Christie M. Vallance

Near Larchmont Park

From: [Jon Grass](#)
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, February 4, 2024 8:50:09 AM

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

Jonathan Grass

From: [Charisse Hamm](#)
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, February 5, 2024 7:54:08 AM

Some people who received this message don't often get email from joncharissehamm@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.

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.

Sent from [Mail](#) for Windows

From: [Thomas Vallance](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project SAVE OUR PARKWAY
Date: Thursday, February 1, 2024 1:36:32 PM

You don't often get email from vallance219@gmail.com. [Learn why this is important](#)

Dear Amber Woertink

As a homeowner in this region, 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.

Have you seen the destruction near Sacramento State and Howe Avenue?

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. Protecting this wildlife corridor is of utmost importance to me. Please the project to move forward in a more intentional and less nature destructive way as we have seen from the recent work near Howe Ave. and Sacramento State.

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

Thomas W. Vallance

From: [Josh Heiskell](#)
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: Friday, February 2, 2024 6:34:38 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.

From: [Scarlet Hughes](#)
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: Friday, February 2, 2024 8:30:21 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.

Sent from my iPhone

From: [Sara Peña](#)
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: Friday, February 2, 2024 6:56:48 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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Thank you.
Sara Peña

From: [Michael Tscheu](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Friday, February 2, 2024 2:21:19 PM

You don't often get email from mtscheu@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. 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.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 9, 2024 10:57 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] American River Parkway Erosion Projects

From: grass7685@comcast.net <grass7685@comcast.net>
Sent: Friday, February 9, 2024 10:55 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: publiccommentarcf16@water.ca.gov
Subject: [Non-DoD Source] American River Parkway Erosion Projects

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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

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

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

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

The American River Parkway is extremely valuable to me.

We use the parkway daily and it is under attack from homeless camps causing pollution and trashing our environment and destroying the habitat to address a problem that does not really exist makes no

A

sense. Plus, the enormous cost to taxpayers. I have seen what is being done down stream from us around the J street bridge and it is unbelievable to think that this is solving anything...it is just destroying the environment. I am in my 60's and the time it takes for this to grow back will not happen in my lifetime.

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:

[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]

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.

Douglas Grass

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 9, 2024 8:52 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: BettyStaley <betijak@yahoo.com>
Sent: Friday, February 9, 2024 7:14 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

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

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

Betty Staley
Resident of Fair Oaks
Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 7, 2024 3:24 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Erosion Project 3B and 4

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

From: Cary Hart <chart1217@comcast.net>
Sent: Wednesday, February 7, 2024 3:23 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Erosion Project 3B and 4

Though I realize there is flood risk in our area, your present plan is too destructive and not targeted enough to be acceptable.

- 1 This part of the American River though in an urban area has been designated Wild and Scenic. Removal of river bank trees and vegetation and replacing them with riprap will destroy the parkway's natural qualities. It will destroy much loved recreation areas and important habitat for fish like salmon, steelhead and sturgeon, migrating and local birds,
- 2 mammals, reptiles and even rare insects. Traffic, vibration and air pollution from heavy equipment will adversely affect both human neighbors and animals on both sides of the river over a large area.
- 3 And all this devastation for dubious return. Since reconstruction of the levees seepage risk is minimal. This section of the river is relatively straight making for less erosion risk than areas like River Park. Some flow modeling suggests that trees can actually slow flow velocity decreasing erosion risk.
- 4 I request that you develop a less destructive, more targeted plan with good public input and maps and be er explanation of that plan that will minimize human and natural disruption. I also request a public onsite tour so we can better understand and have input into what is planned.

Thank you for your consideration.

Sincerely, Cary Hart

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 7, 2024 1:08 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report-December 2023 Report and Appendices

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

From: Donna Thies <zzigzzag61@yahoo.com>
Sent: Wednesday, February 7, 2024 12:52 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report-December 2023 Report and Appendices

Dear US Army Corps of Engineers and Dept. of Water Resources Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, 4A, and 4B. I have serious concerns with the proposed project and the draft SEIS/SEIR, particularly Contracts 3B, 4A, and 4B. I also have serious concerns regarding the proposed project and the draft of SEIS/SEIR environmental analysis.

A I have lived near the American River for over twenty years. I walk and ride my bike regularly. Your devastating methods to prevent potential bank erosion is unnecessary and is just as likely to put us at risk for flooding as no work at all. The banks along California State University Sacramento are a beautiful example of how to prevent flooding by investing in rocks, trees, and shrubs while protecting endangered insects and wildlife.

B The California Environmental Quality Act 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 for alternatives with less environmental impacts is not presented. The bike trail can be the best thing about Sacramento with the proper planning and commitment to preserve the wildness of the trail and make it safe from flooding. We need a plan that incorporates urban planning for parks, trails, and water sports that can be enjoyed for generations to come.

Donna Thies

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 7, 2024 12:09 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] USACE Proposal for the American River #B Project

From: Sharon Kersten <sharon.kersten@sbcglobal.net>
Sent: Wednesday, February 7, 2024 11:41 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] USACE Proposal for the American River #B Project

I have lived in the area along the American River near Mayhew Drain for 33 years and am an avid bird watcher. I have a huge concern regarding the USACE Proposal for the American River #B Project, extending east from Howe Ave. to the Mayhew Drain.

As a bird watcher I am especially concerned of the loss of habitat for many birds but especially the Yellow Billed Magpie. This bird is found only in California, mainly Central California. The Yellow Billed Magpie has been hit hard by the loss of habitat and the West Nile Virus. I have observed that at least a dozen pairs nest in the area you are proposing. The nest in tall trees preferable oaks, along rivers.

I am in two hiking groups, Mission Oaks Park District Hiking Group and Hangtown Hikers. This is one area that both groups hike. I have heard many comments how nice this area is for hiking.

We have hot summers in Sacramento and this is one area where you can get some relief from the heat by hanging out by the river under the canopy of trees. I feel you are doing a huge disservice to our community by going through with this project.

Sharon Kersten

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 7, 2024 12:08 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Immediate Attention; This Needs. Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Ap...

From: Jay D <jaydd1960@gmail.com>
Sent: Wednesday, February 7, 2024 11:25 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; Amriv Trees <amrivtrees@gmail.com>
Subject: [Non-DoD Source] Immediate Attention; This Needs. Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

We need your eyes on this!

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.

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

The lower American River holds a special place in the hearts and the soul of the community. We moved here for it. We live in and with it. I hike, walk the dogs, ride bicycle, fish, and in all ways celebrate the gem of parkway that well be decimated by the 3B, 4A & 4B projects/contracts. Help us. Your our only hope! The American River Parkway is unique. A special Place. We moved here for it. The value of the current vegetation & Tree's and all things under them is immeasurable.

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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges,

which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower

American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive

alternatives, rather than the devastation that is being proposed for Contract 3B.

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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 for your time, and TIA for your action.

Thank's again for taking a look. Time is limited.

Sincerely

Jay Domeny

Riviera East

A lifelong resident of the area.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 7, 2024 9:06 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Barbara Domek <barbjds@yahoo.com>
Sent: Wednesday, February 7, 2024 1:51 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: publiccommentarcf16@water.ca.gov; 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.

The entire American River Parkway and its trees, wildlife and natural environment are extremely valuable to me.

A Trees produce oxygen, remove pollutants from the air, cool the earth with their shade, buffer noise pollution, provide habitat for birds and all manner of wildlife, nourish the soil with their leaf mulch, reduce erosion, create natural beauty and, studies show, improve human mental health and wellbeing when we are among such trees and nature. As Sacramentans we are extremely fortunate to have this beneficial natural parkway running right through our urban communities. It is the crown jewel of our city, beloved by many. My husband and I got engaged in a shady little wooded thicket along the parkway by the Guy West Bridge near CSUS nearly 40 years ago. That very spot has now been bulldozed to complete obliteration. It is heartbreaking to see the devastation there. That must not happen to anymore areas of the parkway. My husband and I continue to walk, bicycle, and/or jog along the still-intact section of parkway by our home near Watt Ave frequently, almost daily. As do our adult children when they come to visit. To not have to get in our cars and drive somewhere or spend money just to go out and be in a wild natural setting, but rather, to be able to walk right out our front

door and come to this beautiful and healing riparian forest within walking distance, is a precious gift we can not afford to lose.

Even if the bulldozed and clear-cut areas are to be "replanted with native vegetation", it will never be the same irreplaceable mature woodland and wildlife habitat, not within my lifetime, or ever. Once it's gone it's gone.

Since I was a child I have explored and connected with nature in this magical natural setting, as have my own children, now grown, and countless other children of all walks of life who have grown up discovering, exploring, learning, respecting and enjoying nature with their families, friends and neighbors along these scenic trails and in these shaded woods. The thrill of chasing butterflies, following animal tracks, identifying songbirds, spotting a beaver or an otter on the riverbank, watching the wispy cottonwood tufts drift like snowflakes in the air, marveling at the color of the Redbud trees, hearing the tapping of a woodpecker, spying a hawk high in the branches of a majestic oak, counting acorns under that tree, feeling the texture of its intricate bark, resting in the shade of its canopy and listening to the breeze rustle its leaves, are joys that enrich our lives, young and old alike. Generations to come should not be denied these same experiences. As stewards of our natural environment, we citizens of Sacramento must be ethically and morally conscientious about our kinship with this natural setting, the American River Parkway, in its entirety, which we cherish and hold dear as a unique and precious gem of our city. It must be preserved.

B There are certainly alternative methods of erosion control that can be implemented which will preserve groupings of standing trees within these areas of the parkway slated for devastating clear-cutting/bulldozing of trees and vegetation. Mature trees MUST be preserved on site in these areas, because of all the benefits they provide now, as mentioned above, and because of the ecological responsibility we carry to conserve these benefits for future generations.

In the book "The Outdoor World of the Sacramento Region, a revision of The Natural History Guide published in 1963" by the Sacramento County Office of Education, the author states: *By the time one is "old enough or wise enough to realize the ecological scheme of things, the interdependence of his own life with that of Earth's natural environment, he has often contributed greatly to the destruction of that environment."* (Author unknown, presumably conservationist Effie Yeaw). Let us have the foresight to not make this mistake before it's too late.

As I've made clear, 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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-

grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions.

I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain

our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

In closing, I ask that you please keep in mind the vision of conservationist and educator Effie Yeaw, one of the original founders of the American River Parkway, that this unique natural habitat be protected for all future generations.

Thank you.
Barbara Domek

Resident of the College-Glen neighborhood
City of Sacramento
La Riviera Drive section of the American River Parkway
Between Howe and Watt Avenues

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 7, 2024 9:00 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Klynton Kammerer <heresyk@yahoo.com>
Sent: Tuesday, February 6, 2024 11:22 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.

A I grew up in Rosemont and spent so much time on the trails and in the river. On both sides, La Riviera Drive and American River Drive. I remember when USACE rammed giant columns in the levees down stream from Watt Ave to strengthen them. I witnessed the near breach and when the river reached the bottom of the

Watt overpass. I was partially in support of when they the fish spawning habitat restoration was happening near Nimbus Dam, but I don't see clear cutting as a viable option to are beloved river system.

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.

Regards.

Klynt Kammerer

Carmichael, Ca

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 7, 2024 9:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Klynton Kammerer <klyntonk@hotmail.com>
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Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows

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Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Concerned Sacramentan,

Klynton Kammerer

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:59 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Mary <marydurbrow@hotmail.com>
Sent: Sunday, February 11, 2024 10:07 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

1 My name is Mary Durbrow. I was born in Sacramento, and I have proudly lived here my entire life. I have taught in Sacramento area schools as public school teacher for 25 years, and I'm currently teaching 1st grade. I am writing to implore you not to move forward with your current plan to destroy the vital riparian habitat along the American River Parkway from Sac State through Watt Ave. There are better erosion control solutions you can employ, and as someone who works with young children on a daily basis, it is unconscionable to destroy an area so vital to our community and the ecosystem we are entrusted with protecting for future generations. The current plan is simply not ok! Please do the right thing and use other methods such as targeted and selective thinning and bank reinforcement. We must lead our children by example, and simply choosing to do the easiest, cheapest thing is quite often not the morally correct solution. I teach my students, "Do the right thing even when nobody is looking." In this case, the youngest, most impressionable will be watching, and they will learn from what you do. I am hoping and trusting you will change your plan and make a better decision on this issue.

Thank you for listening,

Mary Durbrow

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:58 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] So called flood control

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

From: alice stamm <alicestamm777@gmail.com>
Sent: Sunday, February 11, 2024 8:41 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] So called flood control

To whom it may concern

- 1 I have observed the river work of cut trees along the banks of the American River from Fair Oaks Blvd. Rushing water will easily wash down stream such unprotected land which trees for years have held together.
Where is evidence that such a plan will work? That shores will not erode away?
- 2 This river has served this area with its pathways and recreation areas now threatened. When can the public express reaction to this and the ecological perspective of downing heritage trees and the beaches so enjoyed!
I will look for ways to call into question such plans and what might be alternatives.

Respectfully
Alice astamm

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:57 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Army corps

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

From: alice stamm <alicestamm777@gmail.com>
Sent: Sunday, February 11, 2024 8:31 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Army corps

To whom it may concern

1 | I have observed the work along the American River banks by the bridge on Fair Oaks heading into H Str. I cannot believe that this will better prevent flooding and damage better than trees and their roots. Where is evidence made public that this works?

I join efforts to reverse this decision and look for other proven ways.

Respectfully
Alice Stamm

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:56 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] PublicCommentARCF16@water.ca.gov

From: jennifer crown <crown75@gmail.com>
Sent: Sunday, February 11, 2024 4:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] PublicCommentARCF16@water.ca.gov

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

This is not a form letter, please continue reading the entirety of this document.

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 the absolute necessity of the "potential bank erosion" work on 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 likely to put us at risk in high water flows as no work at all. Clearcutting has been proven time and again to be an unreliable and/or ineffective method of preventing erosion. Rather, it has been proven across the continents to accelerate and facilitate erosion such as has been seen in the Amazon Rainforest as well as in numerous countries in Africa.

I strongly oppose the destructive methods being proposed to address potential bank erosion. The environmental analysis does not adequately characterize the significant impacts, provide adequate mitigation to consider them mitigated to insignificant, nor consider less invasive alternatives to supposed “unavoidable” impacts, including considerations of more fine-grained methods than the current proposed measures.

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 included.

My specific concerns and comments include the following:

A As a teacher at O.W. Erlewine and resident of Green Bay Way I am extremely concerned about the impact of construction on the safety of myself, my neighbors, and my students. The diesel fumes and noise levels will be devastating to the health and wellbeing of students and have a terrible impact on instruction and student success.

B I am new to this area having arrived from Maryland and I have seen the damaging effects from this type of erosion prevention project. Bare banks serve to accelerate rather than prevent erosion. I have watched banks collapse by tens of feet per year, eating further into cleared land with human placed rock plates while the other, wooded side lost only 1-2 feet per year despite being overrun with invasive plants.

The destruction of a healthy, vibrant, and thriving ecosystem such as that found along this stretch of the American River goes against what Californians stand for regarding the preservation of our precious environment and shrinking habitat for diverse wildlife. The ecosystem in this area is teeming with an almost unheard-of variety of bird, plant, and animal species. I never cease to be amazed by it. A distinct lack of invasive non-native plants has left room for native plants to sink deep roots as natural protection against erosion.

Investing in the health and strengthening of the current ecosystem, with sparing and careful implementation of manmade structures and barriers will benefit residents, nature, and the environment. For two years I have watched the river rise and recede, leaving behind almost intact shorelines along the area targeted for "improvement". It is not clear to me what improvement is necessary.

Considering its own report following prior levee improvements which stated no further improvement would be needed; 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 move 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.

I invite you to visit my school to experience first-hand the proximity to this proposed project. I also invite you to walk the banks and see for yourself the thriving ecosystem which is itself a strong barrier and mitigator of erosion. Let’s work together to find ways to bolster and protect it rather than destroy it.

Thank you.

Jennifer Crown

Special Educator and Case Manager

O.W. Erlewine Elementary

SDC-ID Mod Severe 4-6

The universe is indifferent. However vast the darkness, we must supply our own light.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:54 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] RE: Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: akins@surewest.net <akins@surewest.net>
Sent: Sunday, February 11, 2024 2:38 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] RE: Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

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

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

We spend considerable time along the American River Parkway including kayaking, cycling, and hiking since we arrived in Sacramento in 1997. We enjoy the well established, large, and old trees and other vegetation that line this riparian zone. The diversity of animals that this supports is fantastic.

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

We 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 at a much more fine-grained scale than simply the overall project.

We are writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are

known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

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

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

Further, we believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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.

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

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

In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the

American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

We 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.

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

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control

projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

Paul Akins, MD, PhD

Victoria Akins, MD, PhD

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:53 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: akins@surewest.net <akins@surewest.net>
Sent: Sunday, February 11, 2024 2:32 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
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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 We are frequently on the parkway including kayaking the river, hiking the trails, and bicycling. We enjoy the large cottonwoods, oaks, alders, and other vegetation along the river. Given the size of many of these trees,

they have been there for more than 75 years in places, particularly the section on the north side of the river between Howe Avenue and Harrington Bar. It is hard for us to understand the need to remove such well established vegetation along the bank that has proven helpful to preserve the river bank at high flows, including our record rainfall year for 2023.

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.\

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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: Joshua <thosewilsons@gmail.com>
Sent: Sunday, February 11, 2024 2:25 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
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My comments focus on the lower American River projects 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. Were it not for the ARP, my family and I would likely not have moved to Sacramento, where we currently serve as teachers in a PS-8 school. This is the last outpost of vibrant nature in Sacramento, and it needs protecting. The joy, health and inspiration it brings me and my family is incalculable. And it is a

tremendous example to other cities of how a natural oasis can exist in an urban environment.

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 at a much more fine-grained scale than simply the overall project.

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The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the

need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

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road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

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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 even 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.

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unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so

designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway's wildlife. A "surgical approach", not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river's edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of

public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity

over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

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

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

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

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate

the existing trees and vegetation). These alternative methods were not adequately evaluated.

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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,

Joshua Wilson

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:51 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Cheryl Slama <csrocker17@msn.com>
Sent: Sunday, February 11, 2024 12:33 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.

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

I've been riding the bike trail for years as well as kayaking and enjoying all the wildlife including otters, fish, deer, birds, coyotes in the parkway.

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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§

21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

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

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

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut to?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

Cheryl Slama
Rancho Cordova resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:51 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices
Attachments: January 2024 Levee Picture 1.jpg; January 2024 Levee Picture 2.jpg; January 2024 Levee Picture 3.jpg

From: Christie Vallance <christiev44@gmail.com>
Sent: Sunday, February 11, 2024 12:20 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

To: ARCF_SEIS@usace.army.mil
Cc: PublicCommentARCF16@water.ca.gov
Bcc: AmRivTrees@gmail.com

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

Dear US Army Corps of Engineers and Dept. of Water Resources
Comment Recipients:

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

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

The American River Parkway and its woods and wildlife is extremely valuable to me. I live in the 3B neighborhood. I value the trails, trees and all of its inhabitants. My family and I regularly walk the trails, enjoy the birds and animals, swim, wade and photograph this area. I moved here to be near the river access and trails.

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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road

haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE

claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas

around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved

small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army

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

I object to the extreme destruction of over 500 trees in Contract 3B-- south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil. The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

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

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

If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of 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. **See Photos attached.**

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

Christie Vallance

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:49 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices Photos Included
Attachments: January 2024 Levee Picture 1.jpg; January 2024 Levee Picture 2.jpg; January 2024 Levee Picture 3.jpg

From: Christie Vallance <christiev44@gmail.com>
Sent: Sunday, February 11, 2024 11:15 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: AmRivTrees@gmail.com
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices Photos Included

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.

Section 3B is my home and is very important to me. I moved into my home in East College Greens to be near the river trails and bike trail. My family and I use this area almost daily for our health and wellbeing. We hike, bike, birdwatch, take nature photos, and swim during the summer.

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.

I am concerned about this project:

- I moved into this neighborhood (east College Green) to be near the hiking trails and bike trail along this special section of the American River Parkway.
- The impact analysis in section 3B from Howe Avenue to Mayhew Drain of the document does not analyze the recreational impacts to me and my family’s health and wellbeing as we use these trails often. We use the trails almost daily. We swim during the summer months. I see many people hiking, wading, bringing kayaks and canoes to use this area. I avoid the rip-rapped banks like the ones this project is using and do not see others using it. Can the project actually improve river access, instead of limiting it?
- Recreation is listed as one of the concepts for management of this area. This project should analyze alternative nature-based solutions to enhance recreational access. This area is home to over

150 species of birds. Over 40 bird boxes that have raised many species will be lost with habitat destruction. Some of these areas can be protected. Many 200- and 300-year-old trees are slated to be removed, some Heritage Oaks. Can you mitigate the impact to the trees?

• I feel more research needs to be done if this project is actually effective. *Please see photos of the erosion on the already completed clearcut area near Sacramento State University. Can you comment on this erosion???**

• The goal isn't to stop all environmental impacts but it is to allow the public discussion about the project's consequences and how to avoid them. As a decision maker, please take all this into consideration.

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 a gift to the many people who enjoy it. These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

Christie Vallance

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:49 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments on the lower American River, Sacramento, CA projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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

From: Dianne Schaub <dogcat2jd@gmail.com>

Sent: Saturday, February 10, 2024 12:35 PM

To: SorgenKC@saccounty.gov; RichDesmond@saccounty.gov; BellasE@saccounty.net; SupervisorSerna@saccounty.gov; Susan_Rosebrough@nps.gov; Barbara_Rice@nps.gov; Kelvin.Lum@mail.house.gov; Amber.Woertink@cvflood.ca.gov; dpoggetto@arpf.org; PublicCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>

Subject: [Non-DoD Source] Comments on the lower American River, Sacramento, CA projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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 or: Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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. 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 YOU in your role as county supervisors, as well as members of the SAFCA Board. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone; and it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you.

Dianne Schaub

Sacramento, CA

Resident and Native

To: ARCF_SEIS@usace.army.mil
 Cc: PublicCommentARCF16@water.ca.gov
 Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices; Specific Comments Pertaining to Hydrology, Erosion, etc.
 9 February 2024

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

The extensive comments detailed below focus on the Lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, 4A and 4B, and were generated and vetted, after careful review of all available documents, by a team of qualified active and retired civil engineers, an emeritus CSUS professor, PhD in Biological Sciences, and a UCD PhD candidate in the history of Sacramento Valley flood control. The comments herein were further vetted by an attorney.

1 In brief, our findings are that the level of riparian habitat and recreational access destruction from rip-rap revetment, rebadged as launchable rock toes, trenches, and planting benches, that is proposed in Contract 3B (including the associated Urrutia mitigation site, ARMS, and also Contracts 4A and 4B due to lack of supporting information) **is not justified by the evidence or the reasoning in the available supporting documentation.**

2 Though the comments contained herein are primarily focused on the lack of, or out-of-date, data and inadequate erosion and hydrological analysis, our comments reflect a broader legal and ethical context. In fact, the Wild and Scenic River Act (WSRA), CEQA and NEPA demand a different approach entirely - one that preserves the Outstandingly Remarkable Values, in this case Recreation and Fisheries, of the Lower American River, and more specifically provides alternative plans for SEIS/SEIR contract elements, such as C3B, that preserve these attributes. Neither the current, 2023 SEIS/SEIR, nor the 2016 GRR upon which it is based, adequately explores known alternative targeted approaches to erosion control such as biotechnical techniques, herein defined as nature-based bank protection, which retain the majority of trees and other riparian habitat qualities. No resources were invested in developing a true biotechnical-based plan as an alternative to what is proposed in C3B. This is inconsistent with CEQA/NEPA requirements (see, e.g., CEQA Guideline 15126.6(a)).

Our findings and comments are presented here in the form of an executive summary with reference to detailed sections to follow.

Executive Summary

Executive Summary bullet points are repeated in the following sections of comment letter and therefore, numbered as comments in the following sections.

- Rip-rapped banks will cut off river access for many American River Parkway recreational users, will eliminate numerous beloved small beaches and swimming areas, and will destroy the ability of people to enjoy the wildlife, trees, shade and beauty that the forest currently supports (Part 1-1).
- 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) (Part 1-2). This loss of shade will

also harm recreationalists that currently use the shade to avoid summer heat and to enjoy beaches and swimming areas.

- USACE has not explored alternative, less destructive measures due to lack of data and contradictory information and claims (Part 1-3).
- USACE's own panel of experts recommended USACE take more soil samples in order to map out erosion resistant banks. We ask that USACE follow that recommendation before doing any work on this part of the river (Part 1-4).
- Failing to map out areas of the river which do not need erosion protection is inconsistent with the state and federal Wild and Scenic River Acts, as well as the American River Parkway Plan, which calls for any erosion measures to minimize impacts to vegetation, and 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. We therefore ask that USACE make targeted, data-driven proposals that are consistent with state and federal law. (Part 1-5).
- Rip rapped banks, such as the launchable rock toes and trenches the Corps proposes to install, will not only eliminate trees, but also will stifle future tree growth (Part 1-6).
- The planting benches the Corps proposes will not provide meaningful mitigation because they will likely collapse when the launchable rock trenches and toes eventually launch, causing significant long-term impacts to salmonid habitat as well as recreational and aesthetic resources (Part 1-7).
- Studies show that the large trees USACE will remove to install their launchable features provide highly effective armoring against the flow velocities of a 200-year flood event. By removing trees, USACE may make us less safe (Part 1-9).
- Modern advanced modeling that was not available in 2016 shows that trees protect banks by redirecting the energy of a river towards the center of its channel. Removing these trees may exacerbate erosion and make us less safe (Part 1-10).
- Cutting the riparian forests along SARA Park will likely increase the possibility of catastrophic levee failure. Historically, catastrophic levee failure during great floods happened much more often where riparian forests had been thinned or clear-cut (Part 1-11).
- From an engineering perspective there is incomplete and inadequate documentation to support a project with such destructive impact on natural resources. This includes inadequate site-specific erosion data and bore hole data and testing (Part 2 A).
- The documents for the project have been found to be sporadic in the identification of erosion, and outdated in that sometimes the experts were basing their assessments of levee risk on pre-slurry wall status rather than taking into account the levee protection afforded by the 60' to 70' slurry walls completed in the levees of this reach by 2015, and further, the priority designations are based on out of date survey information, out of date hydrology modeling, and assessed on too broad of a geographic scale (Part 2 B).
- The SEIR and 2016 GRR upon which it is based misrepresent data with inconsistent reasoning and flawed analyses. The analysis shows zero chance of seepage in the levees of Contract 3B and 4B under 200-year flood protection events. The probabilistic analysis of potential for levee failures under different flood velocities is based on levees before slurry cut-off walls were installed. USACE's very own analyses suggest bank

protection is adequate or that current data is inadequate and more testing and surveys are needed (Part 2 C).

- We ask that the uppermost four, river left (south side), erosion control subcomponents be removed from C3B (the Launchable Toe below Rogue River to Waterton, and then working upriver from around RM mile 9.5: Launchable Trench below upper Rogue River, Launchable Toe below upper Rogue River, and Launchable Toe below Larchmont Park/Rio Bravo). We further ask that the Launchable Toes on river right (north side) between Kadema and Howe also be removed from C3B. Furthermore, because access via Larchmont Park would no longer be necessary, we ask that it be removed from consideration as a staging area and also, because they will no longer be necessary, that any upper access ramp behind Rio Bravo be removed, and that truck access via the Mayhew Drain be removed from the project as well. We ask that all heritage oaks be retained and protected (Part 2 Summary).
- USACE needs to develop a plan that preserves or enhances the vegetative cover, and protects the riparian trees, especially those trees providing canopy cover and shade. That can be achieved with careful data collection and analysis, updated hydrology modeling, and focused and carefully thought-out erosion repair. By using less destructive, biotechnical methods, the forest and habitat between the project and the levee can be protected. Any placement of rock should be limited to protecting the toe of the bank and protecting the root structure of any trees being undercut by erosion, and emplaced by light equipment that does not destroy the vegetative cover of the riparian habitat. Any rock at the toe and extending into the channel should be limited to cobble, rather than quarried rip-rap, and covered in gravel to support anadromous fish (Part 2 Summary).
- Finally, USACE needs to provide all data collected and reports produced in support of this project for independent professional review (Part 2 Summary).

Part 1 Resource Impacts

- 3
1. **Rip-rapped banks will cut off river access for many American River Parkway recreational users, will eliminate numerous beloved small beaches and swimming areas, and will destroy the ability of people to enjoy the wildlife, trees, shade and beauty that the forest currently supports.** 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 in the SEIS displays “bank protection/riverbank protection” for nearly the entirety of Larchmont Community Park, only stopping on the west end of the park, where rip-rapped banks already cut off user access.(A) The 2023 SEIS/SEIR makes no mention of beaches or swimming areas even though the launchable rock toe in front of Larchmont Park would remove at least two beaches. Cutting off access to these long-used primitive river access points will be in violation of the state and federal Wild and Scenic River Acts (which require, e.g., that agencies protect and enhance the recreational values of the Lower American River), as well as the American River Parkway Plan Goal/Policy 8.16.(B) The section of the American River Parkway adjacent

to Larchmont Community Park is an extremely popular water access point, with many social trails leading down to the river. The American River Parkway Plan even lists 3 official pedestrian levee access points in the area between Sara Park and the east end of Larchmont Community Park.(C)

Example of launchable rock toe near Sac State



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A beach in front of Larchmont Community Park that will be made inaccessible by the Launchable Rock Toe. USACE has not addressed lost beaches due to launchable features.



A beloved beach in front of Larchmont used for launching canoes, fishing, swimming, and watching the sunset.

- a. ARCF Comprehensive SEIS/SEIR and Appendix B (Detailed Analyses), 2023, Figure 3.5.2-9, 3-36.
- b. American River Parkway Plan, 2008. Goals and Policies, Public Access and Trails, 8.16, pg 126 - *"A variety of primitive and developed fishing access points shall continue to be maintained."*

https://regionalparks.saccounty.gov/Parks/Documents/Parks/ARPP06-092617_sm.pdf

- c. American River Parkway Plan, 2008. Area Plans - Sara Park, pg 174.

2. **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). This loss of shade will also harm recreationalists that use the shade to avoid summer heat and to enjoy beaches and swimming areas.** Although the proposed 3B South plan does involve mitigation efforts to replant some of the numerous trees that will be lost, you simply cannot mitigate for the mature canopies that exist between Watt Avenue and Larchmont Community Park—these canopies take many decades or even centuries to develop. Removing the trees that are thriving in the proposed construction footprint could have devastating effects on fish populations and sport-fishing alike. In a study

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published by the US Department of Agriculture and the US Forest Service, scientists found that “stream temperatures are far more sensitive to changes in shade than to changes in either air temperature or stream discharge.”(A) Because water temperature is known to have drastic effects on salmon’s ability to migrate for spawning, and the survivability of their eggs/fry, a project like USACE’S 3B will put unnecessary stress on fish. In a report prepared for the National Oceanic and Atmospheric Association (NOAA), it was determined that “[s]tudies of the migration timing and survival of adult Chinook support the notion that high water temperatures can limit migration success,” and that “[t]emperature ranges above optimal may cause fish to cease migration.”(B) If one of the goals is fostering a healthy fishery and ensuring the success and survival of species of interest, like the Chinook Salmon, then the cutting and removal of acres of mature shade-providing trees along the riverbank would be the exact opposite of what is needed. Goal/Policy 3.11 of the American River Parkway plan states: “**Agencies managing the Parkway shall identify, enhance and protect: areas where maintaining riparian vegetation will benefit the aquatic and terrestrial resources; current shaded riverine aquatic habitat.**”(C) In addition to the stress introduced by the potential loss of canopy, the installation of a large amount of rip-rap in place of the existing trees and natural bank undercuts will only further stress these sensitive fish populations. A study presented by the Habitat and Enhancement Branch of Fisheries and Oceans-Canada recognized that “riprap reduced habitat complexity and diversity, important to survival, growth, migration, and reproduction of salmonids,” and that “[n]egative effects of rip-rapped streambanks can include a loss of riparian vegetation, resulting in a loss of nutrients and food sources, decreased future LWD (large woody debris) recruitment, and reduced shade, and a decrease in habitat diversity.”(D) This seems to be in direct contrast with the American River Parkway Plan.

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

3. **USACE has not explored alternative, less destructive measures due to contradictory information and claims.** USACE's current measures are slated to bulldoze 522 trees in the area of Contract 3B South.(A) According to the letters USACE wrote to concerned citizens in 2016: "The proposed bank protection and launchable rock trench measures are the only two possible measures that could address the significant erosion problem on the American River. Other measures were eliminated from consideration because the river velocities render them infeasible. More information on the erosion problem on the American River can be found in the Erosion Protection Appendix to the GRR."(B) This claim that river velocities render biotechnical and bioengineering and woody alternatives infeasible is inconsistent with USACE's own publicly released technical documents, including the one they cite in the above claim, the Erosion Protection Report (ERP). In the ERP, a panel put together by the Corps agreed that there was a high degree of variability in bed materials. For this reason, the panel believed that "more borings should be collected to assure continuity of various layers."(C) Yet for the south side of the Lower American River, the Corps' geotechnical report only analyzed soil samples from mile 3.9.(D) SARA Park is located between river miles 9 and 11, and the geotechnical report noted that unlike other areas of the project study, this area contained "hard material" that was "erosion resistant." Thus, their report concluded that between river miles 7 and 11, "significant scour below this erosion resistant material/surface is not anticipated."(D.1) In other words, USACE's own erosion protection report and geotechnical report (which the agency cites to justify eliminating less destructive measures) state that there are stretches of river in the project footprint where the bed materials are resistant to erosion at anticipated high-water velocities. USACE has not adequately explored how biotechnical and bioengineering alternatives may reinforce these already erosion-resistant materials and minimize losses to vegetation while assuring compliance with the goal of 200 year flood protection.
 - a. <https://waterforum.org/wp-content/uploads/LARTF-Dec-2023-Slides.pdf>, slide 26.(for the 500 trees)
 - b. ARC Final EIS-EIR - Jan 2016 (Updated May 2016), Appendix F-Public Involvement, p. 7.
 - c. ARCF GRR Appendix C Attachment E Erosion Protection Analysis. https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/Documents/GRR/ARCF_GRR_AppendixC_AttachmentE.pdf, p. 17.
 - d. ARCF GRR Appendix C Attachment C Geotechnical Report. https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/Documents/GRR/ARCF_GRR_AppendixC_AttachmentC.pdf, p. 13.
 - i. "Modeling results indicate that for all the flows simulated the shear stress in the reach with locally exposed hard material (between RM 7 and RM 11) is below the critical stress for erosion of moderately resistant materials (clay and cemented sand with silt). Therefore, significant scour below this erosion resistant material/surface is not anticipated." (p. 24)
 - e. Geotechnical Report, 2016 GRR, Figure 10-1, Appendices Page 705
 - i. "As no seepage and stability deficiencies exist, no further improvements are recommended."

10.1 ARN REACH A – AMERICAN RIVER NORTH – U9 LM 1.32

The without project conditions analyses includes the WRDA 1996/1999 cutoff wall and met criteria for both seepage gradients and slope stability factors of safety. **As no seepage and stability deficiencies exist, no further improvements are recommended.** Figure 10-1 displays steady state seepage and landside slope stability results for analyzed flood frequencies.

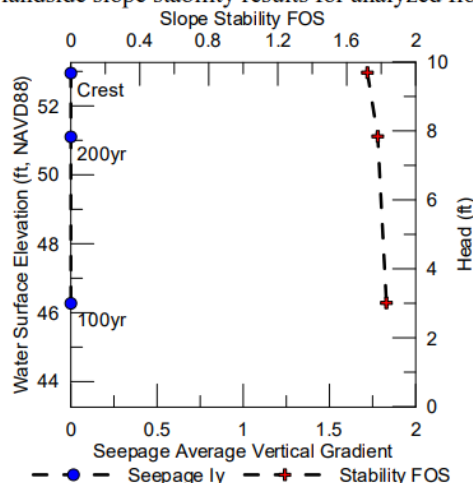


Figure 10-1: ARN Reach A U9 LM 1.32 Without Project Analyses Results

10.2 ARN REACH E – ARCADE CREEK NORTH – U7 LM 0.90

4. **USACE's own panel of experts recommended USACE take more soil samples in order to map out erosion resistant banks. We ask that USACE follow that recommendation before doing any work on this part of the river.** The experts from West Consultants understood that for USACE to properly prioritize work, they would need "systematic and justifiable criteria for site stabilization." For that to be achieved, USACE would need to collect more borings due to a "high degree of variability in the bed materials." Thus, experts recommended USACE collect more borings "to assure continuity of various layers," and they warned USACE that "interpretations made of connecting the dots between borings could be erroneous." More borings could help USACE avoid needless devastation by mapping out "the horizontal and vertical location of the scour resistant clay" in the Lower American River.
 - a. "Attachment E Erosion Protection Report," in *American River Watershed Common Features General Reevaluation Report* (December 2015), 15-17.
 - i. "Systematic and justifiable criteria for site stabilization will be useful not only for prioritizing work but also to rationalize projects to the public and decision makers. (Status: Criteria for site stabilization and prioritization will need to be completed in the future)."
 - ii. "Based on input presented to the panel, there is a high degree of variability in the bed materials. Interpretations made of connecting the dots between borings could be erroneous. More borings should be

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- collected to assure continuity of various layers. Additionally, this refinement in detail needs to be accounted for in the stratigraphic model.”
- iii. “The horizontal and vertical location of the scour resistant clay should be clearly identified and mapped as these materials can impact both vertical and lateral erosion potential of the river. Existing geophysical studies may help with this task and should be identified (see recommendation on consolidating data below). (Status: An initial phase of geologic mapping and 3-dimensional stratigraphic modeling has been completed using existing data as well as data generated for the ARCF GRR study. The level of detail included in the current mapping and modeling is sufficient to support planning level recommendations and conclusions but further refinement could be of benefit depending on the level of certainty required in understanding the locations of this geologic unit).”

9 **5. Failing to map out areas of the river which do not need erosion protection is inconsistent with the state and federal Wild and Scenic River Acts, as well as the American River Parkway Plan. We therefore ask that USACE make targeted, data-driven proposals that are consistent with state and federal law.** The Wild and Scenic River Acts require that the Lower American River’s recreational and fishery values be protected and enhanced. In addition, the American River Parkway 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.” The Plan further requires that “erosion control projects” be designed “to minimize damage to riparian vegetation and wildlife habitat.” Protecting, enhancing, and minimizing damage includes avoiding harmful work that is unnecessary. We can only know how to minimize impacts if we develop an intimate and ever updating map of the river and its varied geologic neighborhoods. Only with careful detail can we use the appropriate tools in the appropriate places and thereby ensure protection of the River’s values. Installing rock trenches and toes that destroy riparian forest along miles of the American River Parkway is like blindly smashing the walls and floors of your home with a sledgehammer in order to kill the ants. Even if erosion resistant materials still need some protection, USACE has inadequately explored how to use biotechnical or bioengineering methods to address both safety and forest protection.

10 **6. Rip rapped banks, such as the launchable rock toes and trenches the Corps proposes to install, will not only eliminate numerous trees, it will also stifle future tree growth.** Studies of rip-rapped streams in places ranging from Oregon to Wyoming and Connecticut have found that overhead bank cover can decline by up to 80% on rip-rapped banks, and even more than half of century later reduce tree cover by almost a third. USACE has insufficiently explored how well trees will grow on planting benches.

- a. David Reid and Michael Church, 2015. Geomorphic and Ecological Consequences of Riprap Placement in River Systems. Journal of the American Water Resources Association.

<https://onlinelibrary.wiley.com/doi/epdf/10.1111/jawr.12279>

- b. T.A. Wesche, C.M. Goertler, and C.B. Frye, 1987. Contribution of Riparian Vegetation to Trout Cover in Small Streams. North American Journal of Fisheries Management. <http://library.wrds.uwyo.edu/wrp/87-14/87-14.pdf>.
 - i. A study of several Wyoming streams found that overhead bank cover was 57-80% less on rip-rapped banks after two years.
 - c. B. Dykaar and P. Wigington, 2000. Floodplain Formation and Cottonwood Colonization Patterns on the Willamette River, Oregon. Environmental Management. <https://link.springer.com/article/10.1007/s002679910007>.
 - i. Rip-rapped banks correlated with a dramatically reduced number of cottonwood trees on the Willamette River.
 - d. D.M Thompson, 2002. Long-Term Effect of Instream Habitat-Improvement Structures on Channel Morphology Along the Blackledge and Salmon Rivers, Connecticut. Environmental Management. <https://pubmed.ncbi.nlm.nih.gov/11815827/>.
 - i. Found that 60 years after rip-rapping, tree growth was 30% less along the rip-rapped banks of the Blackledge River, Connecticut
 - e. Will Russell and Sayaka Terada, 2009. The Effects of Revetment on Streamside Vegetation in Sequoia Sempervirens (Taxodiaceae) Forests. Madroño. <https://www.jstor.org/stable/pdf/41425806.pdf>.
 - i. "The results of this study support the hypotheses that revetment negatively impacts both vegetation and stream bank morphology. Species richness, vegetation cover, and tree recruitment were highest where there was no revetment compared to where revetment was intact on all three study sites." (p. 78)
7. **The planting benches the Corps proposes will not provide meaningful mitigation because they will likely collapse when the launchable rock trenches and toes eventually launch, causing significant long-term impacts to salmonid habitat as well as recreational and aesthetic resources.** Launchable rock features, according to the Corps Geotechnical Report on the American River Common Features Project, are expected to eventually launch. When they do launch, they are expected to take down with them the overlying soil. In their 2021 Biological Opinion, the National Marine Fisheries Service noted that the launching of a toe rock "is likely to result in the loss of some of the mitigation planting bench." They also noted that "the lack of durability of this mitigation is concerning and that "it cannot be accurately determined at what future time this planting bench will be damaged from launchable rock." Because of the possibility that the launchable rock could damage the planting bench, "the overall benefit of the mitigation becomes less certain." NMFS assumed that though there would "be some temporal benefits," there would not be "new habitat created and maintained permanently." (B) Planting benches are a significant form of mitigation USACE is employing for Contract 3B South. According to the 2023 SEIS/SEIR, planting benches are supposed to allow for sites "to be revegetated and used for onsite mitigation for riparian habitat and salmonid habitat." (p. 3-41) On page 4.1-33 and 4.1-34, planting benches are considered part of "mitigation measure veg-2: retain, protect, and plant trees on site." Planting benches specifically would "be used where practicable to

minimize impacts on fish and wildlife species.” (4.1-34) With this mitigation measure, USACE has deemed loss of vegetation which provides shade and habitat to fish significant in the short term but in the long term “less than significant under CEQA.” (3.4-11 and 3.4-12) Planting benches are also used to address American River Parkway Plan policy 3.7 to provide habitat for fish. But if the launchable features are expected to launch, and if launching damages the planting benches, then they cannot be considered a measure that will make long-term impacts to fish and wildlife less than significant. USACE also does not indicate whether or not planting benches themselves will erode. As USACE noted on page 9 of its 2016 Final Environmental Impact Statement/Report: “Both the Sacramento River and the American River are confined by levees and have very little sediment in the water. Additionally, on the American River, Folsom Dam blocks sedimentation from upstream sources. Therefore, the energy of the flow tends to erode riverbanks and levees” (C) As none of the erosion measures address the process which causes riverbank erosion itself (the lack of sediment in the water due to the Folsom Dam), it would have to be assumed that the erosion forces would be turned to the planting benches themselves. USACE should consider how much the planting benches will erode, and how that will affect their long-term viability as mitigation for losses to salmonid habitat, wildlife habitat, and aesthetic values. Though USACE has agreed to monitor the performance of planting benches for a period of 8-10 years, they have not addressed how erosion will affect these planting benches over the course of the 50-year expected lifetime operational of the project. Even if USACE has plans to restore planting benches after launchable features have damaged them, they have not adequately explained how periodic damage to planting benches is consistent with the ability of vegetation to return to its previous mature state. In other words, if planting benches are continually damaged by launchable rock, the trees will never grow to the size they were before the installation of the features and the damage to the aesthetic and habitat resources of the Parkway will be long-term and significant.

- a. ARCF GRR Appendix C Attachment C Geotechnical Report.

https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/Documents/GRR/ARCF_GRR_AppendixC_AttachmentC.pdf

- i. “To protect against waterside erosion in areas where a waterside berm exists, a launchable rock trench may be constructed. This is accomplished by placing rip-rap a certain distance on the waterside slope and excavating a trench at the waterside toe, or where the waterside slope meets the berm. Rip-rap is then placed in the trench and then **covered with random fill**. As the waterside berm erodes, **it will eventually** reach the launchable rock trench. At this point, the undermining action of the erosion event and **soils surrounding the trench** will allow for the riprap contained in the trench to “launch” into the void created adjacent to the trench.” p. 12
- b. NMFS Biological Opinion—May 12, 2021.
https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/Documents/ARCF_Biological-

[Opinion_NMFS_12MAY21.pdf?ver=7EAHWCBfLnXcDAZvxDcArA%3d%3d](#), p. 80.

- i. “Another form of rock protection being used is launchable toe rock. This rock, while buried mostly under the planting benches, is also designed to launch to protect the levee from scour. The launching of this type of stone is likely to result in the loss of some of the mitigation planting bench. As this bench is being created to offset the loss of habitat and create some relief habitat among riprap, it is of high value in a system that is so constrained by levees already. As these benches are being constructed to offset the impacts of habitat loss, the lack of durability of this mitigation is concerning. As it cannot be accurately determined at what future time this planting bench will be damaged from launchable rock, the overall benefit of the mitigation becomes less certain. It is assumed that there will be some temporal benefits, but not new habitat created and maintained permanently.”

- c. [American River Watershed Common Features General Reevaluation Report, Final Environment Impact Statement/Environmental Impact Report, December 2015, Revised May 2016.](#)

- i. “Both the Sacramento River and the American River are confined by levees and have very little sediment in the water. Additionally, on the American River, Folsom Dam blocks sedimentation from upstream sources. Therefore, the energy of the flow tends to erode riverbanks and levees.” p. 9

8. **Studies show that the large trees USACE will remove to install their launchable features provide highly effective armoring against the flow velocities of a 200-year flood event. By removing trees in areas that don't need erosion protection, USACE may make us less safe.** The large trees (oaks, cottonwoods, ash, white alder, and black walnut) USACE plans to remove in order to install the launchable rock toes and trenches protect the bank against the scouring forces of the river. This is an area (Contract 3B South) 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. Table 4-4 in the Erosion Protection Report suggests 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 recommended that “riparian forests should be conserved to provide bank stability and to maintain an equilibrium of river and floodplain dynamics.”

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

9. **Modern advanced modeling also shows that trees protect banks by redirecting the energy of a river towards the center of its channel. Removing these trees may exacerbate erosion and make us less safe.** Because of large trees, the water along the river banks in this part of the river during a storm is stagnant. It does not move fast enough to scour the banks. Kevin Flora and Ali Khosronejad found that at the cross-sections of three locations of the American River, trees significantly reduce velocity flow

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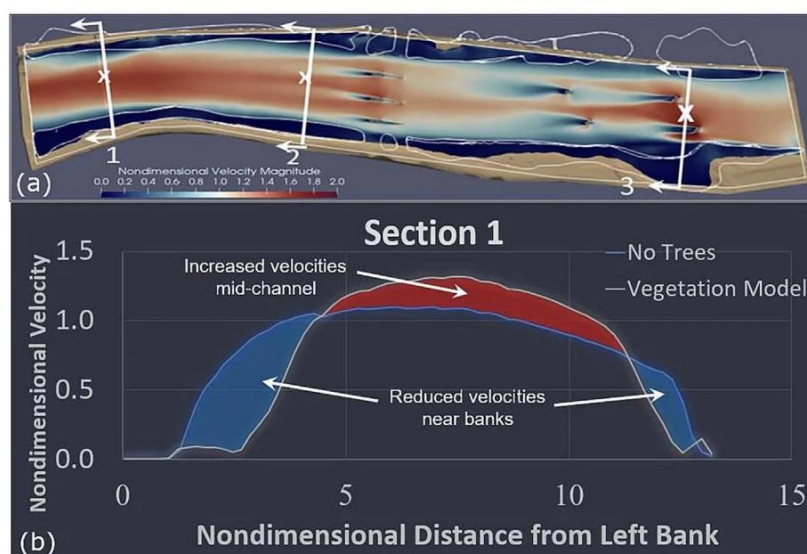
along both banks, while increasing velocities in the center of the channel. (A) Empirically, this is confirmed by a photo showing a dog wading in the waters (see picture) along the riverbank in front of Larchmont Park during the 80,000 cfs high water mark in 2017. This empirical evidence is further confirmed by velocity contour maps provided by the Sacramento Area Flood Control Agency in a report prepared by MBK Engineers called "The 2017 Lower American River Stream Bank Erosion Report." These velocity contour maps show that during 145,000 cfs flows, the velocity along the banks between River mile 10.5 and 11, an area that encompasses the proposed project footprint in front of Larchmont Community Park, is only expected to be 0-2 feet per second, well below any velocity that could scour the banks. (B) However, if USACE removes large trees to install launchable features, water will move along the banks much faster.

- a. Flora Kevin and Ali Khosronejad. 2023. "Uncertainty Quantification of Bank Vegetation Impacts on the Flood Flow Field in the American River California Using Large-Eddy Simulations." *Earth Surface Processes and Landforms*. <https://doi.org/10.1002/esp.5745>: 7.
- b. MBK Engineers, "2017 Lower American River Streambank Erosion Monitoring Report," (April 2018), Appendix B.

FLORA and KHOSRONEJAD

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



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La Riviera
February 10, 2017 9:09 AM

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10. **Cutting the riparian forests along SARA Park will likely increase the possibility of catastrophic levee failure. Historically, catastrophic levee failure during great floods happened much more often where riparian forests had been thinned or clear-cut.** Several studies show that during the two worst floods that ever struck the United States—Mississippi in 1927 and Missouri/Mississippi in 1993— levee failures occurred much more frequently in areas where the forest had been cut down or thinned than in areas with thick and wide tree cover.
- a. O. S. Scheifele, 1928. Protecting River Banks and Levees. The Canadian Engineer.
 - i. Observed during the 1927 Mississippi floods that damage to levees was nonexistent where heavy stands of trees grew between the riverbank and levee. The greatest damage was in cleared areas.
 - b. J.P. Dwyer and D.R. Larsen, 1997. Value of Woody River Corridors in Levee Protection Along the Missouri River in 1993. Journal of the American Water Resources Association.
https://www.researchgate.net/publication/230348698_Value_of_Woody_River_Corridors_in_Levee_Protection_Along_the_Missouri_River_in_1993
 - i. A study of a 39 mile long corridor along the Missouri River found that where the width of the forest decreased, the lengths of levee failures increased during the 1993 floods. 88% of levee failures occurred where the riparian forest was less than 300 feet wide.
 - c. Stephen B. Allen, John P. Dwyer, Douglas C. Wallace, and Elizabeth A. Cook, 2023. Missouri River Flood of 1993: Role of Woody Corridor Width in Levee Protection. Journal of the American Water Resources Association.
<https://onlinelibrary.wiley.com/doi/epdf/10.1111/j.1752-1688.2003.tb04416.x>
 - d. Donald H. Gray, 2009. Effect of Woody Vegetation Removal on the Hydrology and Stability of Slopes
 - i. cutting of trees on slopes destabilizes levee as roots which previously reinforced the slope decay
 - ii. root decay can also lead to the formation of pipes in a slope which promote internal or seepage erosion
 1. the removal of tree canopy results in the loss of interception and evapo-transpiration which tends to promote wetter and less secure slopes (p. 1)

Part 2. Erosion/Engineering

USACE, in their C3B plan, proposes to cut down over 500 trees and bulldoze miles of the south bank of the Lower American River (LAR) riverbank between Watt Avenue and the Mayhew drain. The LAR is designated as a Wild and Scenic River with outstanding values for fisheries and recreation. With so much wildlife habitat and recreational and aesthetic value at stake, one should expect to see ample data in the C3B documentation to support such a destructive proposal. Instead, a review of the supporting documentation shows that 1) there is minimal supporting data, 2) data that USACE claims to support their proposal is not reported or available for independent public review, 3) USACE is misrepresenting existing data and information, and 4) USACE has ignored their own recommendations, provided in the available documentation, that such work is either unnecessary or needs further study.

A. From an engineering perspective there is incomplete and inadequate documentation to support a project with such destructive impact on natural resources. This includes inadequate site-specific erosion data and bore hole data and testing.

1. No erosion data is presented in the SEIS/SEIR specific to the new C3B project. The SEIS/SEIR relies only on archived GRR Geotechnical and Erosion appendices and cited unavailable references, as noted below.
2. The GRR Geotechnical analysis depends on samples obtained from 5 boreholes placed throughout the Sacramento River, Natomas Basin and American River basin. The nearest cited borehole to the C3B project area is over a mile downstream, on the north bank near Howe Avenue.
3. The GRR Geotechnical Report page 25 of 48 (page 709 of the Appendices), claims that soil data was collected in various studies, including subsurface soil collection, soil testing, JET erosion testing, and Erosion Function Apparatus testing on undisturbed samples. USACE should make this data available, along with sampling locations.
4. The GRR Erosion Protection Report states on page 18, Section 1.8.1, that the Sacramento District performed *"a total of 11 vertical soil borings within the American River channel, 29 vertical soil borings on the levee crest and waterside channel bench, and 15 cone penetrometer tests (CPTs) on the waterside channel bench. The URS subsurface investigation included a total of 44 borings, with 24 primary sonic borings and 20 companion air rotary casing hammer (ARCH) borings along the levee crest and waterside bench."* None of this data has been presented in the C3B documentation or is readily available to the public.
5. The C3B documentation refers to geophysical surveys to define project area stratigraphy. However, a basic principle of geophysical surveys is that the data needs to be validated with on-site boreholes. The Erosion Protection Report states *"Extensive drilling has been conducted on the LAR corridor, resulting in high vertical resolution datasets describing the lithology and stiffness of the sediments."* However, the closest documented borehole to the project area is the borehole located at Howe Avenue. As stated above, if additional borehole data is available, USACE needs to make this data available for public review.

B. The project documents are sporadic in the identification of erosion, and outdated in that sometimes the experts were basing their assessments of levee risk on pre-slurry wall status rather than taking into account the levee protection afforded by the 60' to 70' slurry walls completed in the levees of this reach by 2015, and further the priority designations are based on out-of-date survey information, out of date hydrology modeling, and were assessed on too broad of a geographic scale.

Note: the two Fugro maps are particularly crucial for a review of the USACE proposal and to determine whether it is even necessary. For example, in the upper reaches of project 3B, or reach 4-1, south side in particular, there is extensive clay bank hard pan (Pleistocene Fair Oaks Formation) underlying the upper, compacted and vegetatively armored, soils and extending out into the river, protecting both the berms and the base of the slurry wall. This is not documented in the current SEIS/SEIR but is mentioned only in the archived erosion analysis appendix of the preceding 2016 GRR.

Furthermore

- "Modeling results indicate that for all the flows simulated, the shear stress in the reach with locally exposed hard material (between RM 7 and RM 11) is below the critical stress for erosion of moderately resistant materials (clay and cemented sand with silt). Therefore, significant scour below this erosion resistant material/surface is not anticipated. However, this is for general

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reach wide trends and local erosion such as at bridge piers may occur. Local scour should be further evaluated during future studies.” (Erosion Protection Report, Pg 40).

“Surficial geologic mapping and synthesis of geotechnical data show that the Pleistocene age Fair Oaks formation is exposed in the channel bed and banks locally upstream of Watt Avenue (RM 9.0 to 11.0) and intermittently exposed in the channel bed downstream of Watt Avenue to near RM 6.7 (slightly downstream of the Guy West pedestrian bridge). Prominent outcrops upstream of Watt Avenue occur at RM 10.1 and from RM 9.4 to 9.7.” (Erosion Protection Report, Pg 48).

The Fair Oaks Formation appears to be erosion resistant, therefore its location within the stream banks needs to be determined with certainty. With careful data collection and analysis, and focused and strategic erosion repair or control projects (using less destructive methods), protecting the habitat between the project and the levee could be accomplished.

C. The 2023 SEIS/SEIR and 2016 GRR upon which it is based misrepresent data with inconsistent reasoning and flawed analyses. The analysis shows zero chance of seepage in the levees of Contract 3B and 4B under 200 year flood protection events. The probabilistic analysis of potential for levee failures under different flood velocities is based on levees before slurry cut-off walls were installed. USACE’s very own analyses suggest bank protection is adequate or that current data is inadequate and more testing and surveys are needed.

26

1. Particularly in the Geotechnical Report, much discussion is spent on seepage and slope stability. However, Section 10.1 for the analysis at the north bank near Howe Avenue, and Section 10.3 for the analysis on the south bank near Paradise Beach, show that with the 1996/1999 cutoff wall installed, there is no problem with seepage and instability. These are the two areas nearest to Contract 3B work on the south bank above Watt Avenue. This area also has a cutoff wall installed, therefore there is not expected to be any issue related to seepage and slope instability.

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2. Section 17.0, Probabilistic Analyses, provides a “probabilistic evaluation” of each index point to evaluate uncertainty in model parameters regarding seepage and slope stability. This section provides graphs of probable levee performance without the project and with the project. Figures 17-1 and 17-2 supposedly show the improvement of performance of the levee at Howe Avenue. However, Figure 17-1 shows the curve without the project also does not include the cutoff wall, whereas Figure 17-2 curve includes the cutoff wall. This is therefore an “apples to oranges” comparison of the need for erosion protection.

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3. Section 17.0 portends to apply a “probabilistic analysis” and provides graphs to show the increase in performance of the levees, as if this can be quantified with mathematical precision. However, the analysis itself includes a judgement factor (Geotechnical Report, page 31 of 48): “A judgment based conditional probability function for each analyzed cross-section was based on existing conditions of the levee such as encroachments on the levee slopes, vegetation on the levee slopes and in the vicinity of the levee toes, existing cracks and holes due to animal burrows, erosion of the waterside levee slopes and riverbank, and considering the past history of sand boils or slope failures. Generally, past experience with poor performance at utility crossing and rodent activity indicates the risk of failure is somewhat significant in the analyzed areas.” Therefore, the graphs themselves are misrepresentative; engineering judgement and observations are important, but they cannot be quantified and should not be presented as such.

17.1 ARN REACH A – AMERICAN RIVER NORTH – U9 LM 1.32

Borings chosen to be used in probabilistic analyses resulted in a mean blanket thickness value of 15.0 ft with a coefficient of variation of 96, and a mean aquifer thickness of 24.0 ft with a coefficient of variation of 42. The blanket was comprised of predominantly silty sands. The aquifer was made up of poorly graded sand to silty sand, and silty gravel.

The levee embankment contains an existing cutoff wall which mitigates underseepage, through seepage, and slope stability concerns. The without project judgment based probability portion of the curve was comprised mainly of erosion, and encroachments, accounting for 50.0% and 4.0% respectively at the crest. Past performance has indicated significant amounts of erosion of the riverbank, waterside levee slope and foundation. Overall judgment based contributions account for a $Pr(f)$ of 55.3% of the without project combined curve at the levee crest. Figure 17-1 presents the without project conditions combined curve.

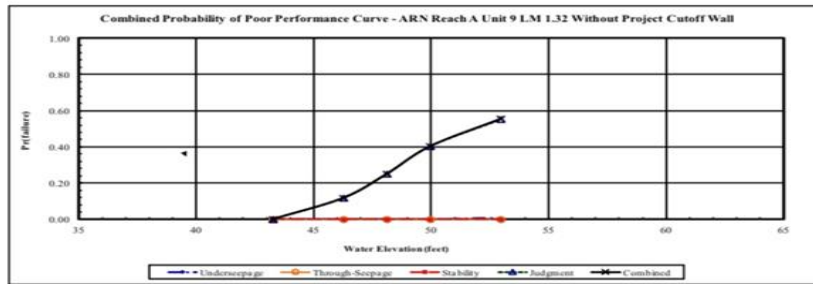


Figure 17-1: Combined Probability of Poor Performance for Without Project Conditions

The remaining probability of failure was primarily attributed to the judgment based failure modes, erosion, which is proposed to be mitigated through the placement riprap erosion protection. With project improvement measures reduce erosion to a $Pr(f)$ of 5.0% at the levee crest. Figure 17-2 presents the with project conditions combined curve.

pg 716, 717

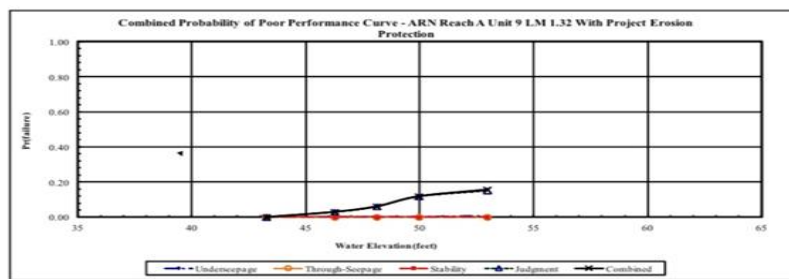


Figure 17-2: Combined Probability of Poor Performance for With Project Conditions

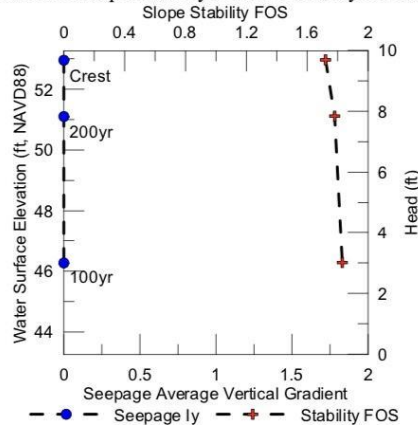
D. USACE Ignoring Recommendations

1. Geotechnical Report, 2016 GRR, Figure 10-1, Appendices page 705, in the text above Figure 10-1, reads: "As no seepage and stability deficiencies exist, no further improvements are recommended." Therefore, the Geotechnical Report refutes the need for erosion protection at Howe Avenue to prevent seepage.

pg 705

10.1 ARN REACH A – AMERICAN RIVER NORTH – U9 LM 1.32

The without project conditions analyses includes the WRDA 1996/1999 cutoff wall and met criteria for both seepage gradients and slope stability factors of safety. As no seepage and stability deficiencies exist, no further improvements are recommended. Figure 10-1 displays steady state seepage and landside slope stability results for analyzed flood frequencies.



Just upstream
Home Ave Bkly
N. Side

Figure 10-1: ARN Reach A U9 LM 1.32 Without Project Analyses Results

Figure 10-1 2016 GRR Appendices page 705.

2. Erosion Protection Report, pages 14-15, cites the West Consultants, Panel of Experts Findings Report, December 2010 (Panel meeting from October 6-8 & November 16, 2010), and provides several recommendations that USACE does not appear to have followed, or if they have, they have not made public:
 - a. "With relatively little effort the existing HEC-6T sediment transport model can be modified to better reflect bed sediment conditions. Results of the model may shed light on vertical stability of the system and could also be used to examine "what-if" scenarios (e.g., stable points such as the gravel plug or clay outcrops are removed). (Status: HEC-6T was modified to reflect improved Erosion Protection Report American River Common Features GRR 15 April 2014 information on bed sediment conditions. However, what-if scenarios have not been conducted to date.)"
 - b. "The horizontal and vertical location of the scour resistant clay should be clearly identified and mapped as these materials can impact both vertical and lateral erosion potential of the river. Existing geophysical studies may help with this task and should be identified (see recommendation on consolidating data below). (Status: An initial phase of geologic mapping and 3-dimensional stratigraphic modeling has been completed using existing data as well as data generated for the ARCF GRR study. The level of detail included in the current mapping and modeling is sufficient to support planning level recommendations and conclusions but further refinement could be of benefit depending on the level of certainty required in understanding the locations of this geologic unit)." It appears that that detailed mapping of the south bank geology could identify local areas that need erosion protection, as opposed to deploying the destructive launchable trenches and corresponding heavy equipment access.

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- c. *"Many of the experts viewed the results of the EFA erosion testing program with some doubt or skepticism which points to the need for better characterization of the erodibility of the resistant materials. (Status: Additional EFA as well as JET testing was completed on many samples collected on the channel banks and riverbed. There is a need to study those results, place them in a geologic context, calibrate them based on judgment and any potential scaling effects, and provide guidance on incorporating them into the hydraulic models. This has not been completed)." It is not clear that this data has been considered in regards to developing a less destructive alternative.*
 - d. *"Many of the experts agreed that existing data is scattered may not be readily available to professionals studying this reach of river. A centralized database should be created to make past studies accessible. (Status: Much of the data has been centralized on the network)." Apparently USACE has established, or is in the process of establishing, a centralized database, however, that database does not appear to be available for independent professional review.*
 - e. *"Monitoring should continue and possibly be enhanced or extended by various methods. (This has not been completed for this project during the feasibility phase of the study, but should be a component of future efforts)."*
 - f. *"Systematic and justifiable criteria for site stabilization will be useful not only for prioritizing work but also to rationalize projects to the public and decision makers. (Status: Criteria for site stabilization and prioritization will need to be completed in the future)." This is the crux of why this letter is needed. It is not clear what rationale and criteria were used by USACE to justify this destructive proposal in what appears to be a stable reach of the river.*
 - g. *"Based on input presented to the panel, there is a high degree of variability in the bed materials. Interpretations made of connecting the dots between borings could be erroneous. More borings should be collected to assure continuity of various layers. Additionally, this refinement in detail needs to be accounted for in the stratigraphic model. (Status: This is true of any such geotechnical model. Additional investigation is deferred to future analysis and design efforts)." USACE needs to follow this recommendation.*
- 31 3. Erosion Protection Report, 1.10.1, page 22: *"NHC concludes that there are no actively migrating meander bends on the Lower American River." Also, "Annual river surveys show that lateral erosion and bankline shift is occurring on the Lower American River, but on a scale too small to be accurately identified by air photo interpretation." This statement would indicate that any erosion that is occurring is minor and progressing slowly.*
- 32 4. Erosion Protection Report, 1.10.2, page 24: *"Modeling results indicate that for all the flows simulated the shear stress in the reach with locally exposed hard material (between RM 7 and RM 11) is below the critical stress for erosion of moderately resistant materials (clay and cemented sand with silt)." Therefore, at least parts of the south bank are non-erosive. These areas should be clearly delineated.*
- 33 5. Erosion Protection Report, 7.1, page 70: *Additional efforts are needed in the future to support implementation. These include but are not limited to:*
- a. *• Confirm that portions of the levee not included in Figure 6-3 for new bank protection are designed for the 160,000 cfs design discharge on a site-specific basis,*
 - b. *• Develop and implement a site-selection and prioritization process,*
 - c. *• Collect data necessary for site-specific analysis of existing bank protection and design of new bank protection,*
 - d. *Design the needed rock protection based on site-specific data in accordance with standard engineering practice and USACE guidelines,*
 - e. *• Monitor bank protection performance during and after flood events.*

Summary

- 34 The south bank of the Lower American River between approximate river miles 9.5 to 11 is heavily vegetated with mature riparian habitat. Unlike other reaches of the LAR further downstream, this area survived the floods of 1986 and 1997 with only minor erosion. Furthermore, as seen in videos taken during the 1997 flood event, the riparian corridor slows the velocity of the river to near zero at the levee and at the banks above the summertime base flow. Therefore, the riparian vegetation is protective of the levee and the banks. Erosion that is occurring is mostly limited to isolated areas at the toe of the bank, near the summertime base flow.
- 35 The SEIR/SEIS does not provide any further data or analysis showing that this project is necessary. In fact, implementation of this project is likely to increase water flow velocities near the levee and the bank, resulting in more erosion and instability of these features.
- 36 We therefore ask that the uppermost four river left (i.e., south side) erosion control subcomponents be removed from C3B (the Launchable Toe below Rogue River to Waterton and then working upriver from around RM mile 9.5: Launchable Trench below upper Rogue River, Launchable Toe below upper Rogue River, Launchable Toe below Larchmont Park/Rio Bravo). We further ask that the Launchable Toes on river right north side between Kadema and
- 37 Howe also be removed from C3B. Furthermore, because access via Larchmont Park would no longer be necessary, we ask that it be removed from consideration as a staging area, and also, because they will no longer be necessary, that any upper access ramp behind Rio Bravo be removed, and that truck access via the Mayhew Drain be removed from the project as well. We
- 38 ask that all heritage oaks be retained and protected.
- 39 USACE needs to develop a plan that preserves or enhances the vegetative cover, and eliminates removal of any mature trees. With careful data collection and analysis, and updated hydrology modeling, focused and carefully thought-out erosion repair or control projects could be accomplished that use less destructive, biotechnical methods that protect the riparian
- 40 habitat. Any placement of rock should be limited to protecting the toe of the bank and protecting the root structure of any trees being undercut by erosion, and emplaced by light equipment that does not destroy the vegetative cover of the riparian habitat. Any rock at the toe and extending into the channel should be limited to cobble, rather than quarried riprap, and covered in gravel to support anadromous fish.
- 41 Finally, USACE needs to provide all data collected and reports produced in support of this project for independent professional review.

Thank you,

William Avery
Joshua Thomas
Gerald Djuth
William Brattain

cc: Barbara Rice, National Park Service
Susan Rosebrough, National Park Service
Harry Williamson, National Park Service
Liz Bellas, Director, Sacramento County Regional Parks
KC Sorgen, Sacramento County Regional Parks

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:46 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Trees

From: Paula Sullivan <searanchgirl@gmail.com>
Sent: Saturday, February 10, 2024 11:12 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Trees

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.

[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.]

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:

[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]

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

4 ↑ treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

Paula Sullivan
Robert Sullivan

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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

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

This letter's focus is on the projects of the lower American River, the draft SEIS/SEIR, and particularly Contracts 3B, and 4A and 4B.

- A** | I am a plant ecologist and do not think that the function and justification of the proposed project are adequately presented in the draft SEIS/SEIR environmental analysis.
- B** | 1) The charts and maps that show the plan for demolition and planting are poorly displayed and show inadequate content. The projects need to be presented at a much finer scale with detailed notation for each aspect of the proposed destruction and re-planting.
- C** | 2) The American River Parkway constitutes some of the only remaining riparian forest in Central California, 95% of which has been destroyed since European settlement. Its environmental value is priceless. The forest's plants and animals represent genetic resources that are important for recolonization and habitat preservation in the future. Evidence has not been shown for how planting bare ground with plants of identical genetic stock will replace or justify the huge loss of plant and animal biodiversity.
- D** | 3) Mature trees are not a risk to levee stability. Detailed evidence from similar sites and soils should be presented before proceeding with the destruction of the forests. For example, the exact rates of collapse and erosion on the specific soil types of the project should be tested with and without mature vegetation. Likewise, the removal of +200-year oaks cannot be justified without detailed analysis of root systems of old trees, and their role in stabilizing soil from erosion. The proposed approach of clearcutting and bare banks during two years of construction followed by years of isolated, immature plantings, is very likely to generate more erosion, especially under high water flows, as compared to leaving the forest intact. Data on erosion rates on recent restoration areas along the American River in response to winter rainfall need to be collected before considering this new set of projects.
- E** | 4) Animal diversity is much higher in California's Valley Riparian Forest (<https://vegetation.cnps.org/alliance/571>) than in most other ecosystems in the state. Destruction of the forest will remove premium habitat for native insects, birds, mammals and fish. For example, large trees provide nesting areas and produce shade along the river's edge for fish. Forest removal creates an environmental disaster for animal biodiversity and diminishes the

intrinsic value of the landscape for recreational and mental health benefits. These benefits must be addressed more fully.

F | The proposed destruction of the forest cannot be justified without further science. The environmental analysis does not adequately characterize environmental impacts, and mitigation is inadequate. Feasible alternatives for “unavoidable” impacts, including considerations of alternative methods need to be described in a much more detailed way.

Under the California Environmental Quality Act (CEQA), all feasible mitigation measures must 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 with a scientific, fine-grained approach is not presented nor are a wide range of alternatives compared for their environmental impacts.

The US Army Corp of Engineers should perform a much more thorough environmental analysis of the impacts of the proposed project and its subcomponents. Contracts 3B and 4 should not be considered until less destructive alternative approaches to Erosion Control Projects 3B and 4 are described in detail. Scientists should be invited to provide rigorous evaluation of the environmental analysis and their proposed alternatives should be incorporated in the SEIA/SEIR.

The American River Parkway is a very special and unique set of ecosystems that provides multiple benefits for many people. These proposed projects will create a disaster that harms plants, animals, and the environment, and are contrary to intrinsic human values for nature. It is unreasonable to proceed without more justification and the identification of viable alternatives.

Thank you.

Louise Jackson, PhD

***Retired Professor and Cooperative Extension Specialist
Dept. of Land, Air and Water Resources
University of California Davis***

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:45 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Jay D <jaybird1960@live.com>
Sent: Saturday, February 10, 2024 9:01 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River projects 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 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.]

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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish

and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.
Jay DDomeny

Are you hearing us? We call for reasonable armycorp and public review to achieve a solution to celebrate .

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 8:44 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Stop ARCF until adequate & appropriate review is made. No action should take please without thorough global scrutiny by experts and the impacted community's.

From: Jay D <jaybird1960@live.com>
Sent: Saturday, February 10, 2024 8:56 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Stop ARCF until adequate & appropriate review is made. No action should take please without thorough global scrutiny by experts and the impacted community's.

Jay Domeny
Lifelong resident of the area.

P.S. if your plan to destroy the river community we moved here for is successful. We shall have to move. We will hold all responsible parties copable for any reduction in property values.
Stop this ill thought plan.
Jay Domeny

Sent from Samsung Galaxy smartphone.

From: Lief, Chris@CVFPB
Sent: Monday, February 12, 2024 11:20 AM
To: Buckley, Andrea@CVFPB; Calles, Jennifer@CVFPB
Subject: FW: Stop the Army Corps clearcutting our heritage oaks and sterilizing all natural local wildlife

From: Jay D <jaydd1960@gmail.com>
Sent: Saturday, February 10, 2024 9:14 AM
To: Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>
Subject: Stop the Army Corps clearcutting our heritage oaks and sterilizing all natural local wildlife

You don't often get email from jaydd1960@gmail.com. [Learn why this is important](#)

We need your eyes on this!

Immediate attention necessary.

Time is limited. Public comment ends and action must be effected by 2-23-2024. Tia for acting!

Jay Domeny

From: Lief, Chris@CVFPB
Sent: Monday, February 12, 2024 11:20 AM
To: Buckley, Andrea@CVFPB; Calles, Jennifer@CVFPB
Subject: FW: American River Trees

From: Kelly Moss <kelly@thesecondchildhood.net>
Sent: Monday, February 12, 2024 9:35 AM
To: Woertink, Amber@CVFPB <Amber.Woertink@CVFlood.ca.gov>; Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>
Subject: American River Trees

You don't often get email from kelly@thesecondchildhood.net. [Learn why this is important](#)

Hello,

1 Please host an in-person workshop and board hearing regarding the US Army Corps of Engineers' (USACE) Contract 3B while comments are still being accepted (before Feb 23)

Thank you,
Kelly Moss

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 3:49 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Meeker, Amanda <ameeker@californiamuseum.org>
Sent: Monday, February 12, 2024 3:40 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 have watched with horror as the riparian area near the H Street bridge, where I spent countless hours as a child watching birds and learning how to identify trees using dichotomous keys, has been destroyed by the current project. One of the best things about Sacramento is the way we urbanites – from all socioeconomic backgrounds– can quickly and easily visit our parkways improving our mental health and physical well-being by experiencing nature.

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 isolated immature plantings, may put us at higher risk in high water flows as no work at all, and with unavoidably huge costs for our wildlife, our trees, and ourselves. Having studied the history of flooding in the Sacramento Valley at length in the course of my professional career as a historical consultant and a curator, I know that past US Army Corps efforts to channelize and contain our rivers has often resulted in the opposite of the desired effect. I am admittedly a historian, not an

engineer, but allowing rivers and streams more room to follow their natural course, and letting riparian vegetation do its natural work of stabilizing banks, seems a better approach.

I oppose the devastating methods being proposed to address potential bank erosion concerns. I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation, nor considers all feasible alternatives to supposed “unavoidable” impacts, including consideration of alternative methods.

Under the California Environmental Quality Act (CEQA), even where impacts 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. Analysis of alternatives with less environmental impact is not presented.

The US Army Corps of Engineers should perform a more thorough environmental analysis of the significant impacts of the proposed project and its subcomponents and should not proceed 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.

Please save the American River Parkway for all of us and for the generations to come.

Thank you

Amanda Meeker
Executive Director

CALIFORNIA MUSEUM
1020 O Street | Sacramento, CA 95814
CaliforniaMuseum.org

ameeker@californiamuseum.org
(916)653-0399

Pronouns: She/Her

My work hours may not be yours. Please do not feel obligated to respond outside of your regular working day.

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 3:06 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Common Features public comment

From: Mark Rakich <markrakich@gmail.com>
Sent: Monday, February 12, 2024 2:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Common Features public comment

1 | I honestly do not understand why the Army Corps wants to destroy such a vast stretch of open space/habitat/nature preserve. In the past few years, the Army Corps has done extensive work on THE ACTUAL LEVEES. The proposed wildlife/nature destruction is in the area between the levees and the river. What in the world justifies this attack on natural habitat that is one of the GEMS of the Sacramento area, when the actual levees are in good shape and have, in fact, been upgraded in recent years. PLEASE re-think this mindless aberration of alleged public policy.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 1:01 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS; Bruton, J Paul CIV USARMY CESPCK (USA)
Subject: [EXT] FW: [Non-DoD Source] Preserve the natural environment of the American River Parkway.

From: Bruton, J Paul CIV USARMY CESPCK (USA) <Joseph.P.Bruton@usace.army.mil>
Sent: Monday, February 12, 2024 12:01 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: FW: [Non-DoD Source] Preserve the natural environment of the American River Parkway.

Team – Public Comment

From: Barbara Domek <barbjds@yahoo.com>
Sent: Sunday, February 11, 2024 1:18 AM
To: SPK-PAO SPK <SPK-PAO@usace.army.mil>
Subject: [Non-DoD Source] Preserve the natural environment of the American River Parkway.

- 1 | Do not destroy the natural habitat and mature trees along the Wild and Scenic American River Parkway from Howe Avenue to Larchmont Park.
- 2 | There are alternative methods of erosion control that can be implemented which will preserve groupings of standing trees within the areas of the parkway slated for devastating clear-cutting. Mature trees must be preserved on site in these areas. Trees produce oxygen, remove pollutants from the air, provide habitat for birds and a diverse array of wildlife, buffer noise pollution, cool the earth with the shade of their canopy, nourish the soil with their leaf mulch, reduce erosion, create natural beauty and, studies show, improve human mental health and wellbeing when we are among trees and nature. As Sacramentans we are extremely fortunate to have this beneficial natural parkway running right through our urban communities. It is the crown jewel of our city. To not have to get in our cars and drive somewhere just to be in a wild natural setting, but to be able to walk right out our front door and come to this beautiful and healing riparian forest within walking or
- 3 | bicycling distance is a gift we can not afford to throw away. Even if the bulldozed and clear-cut areas are to be "replanted with native vegetation", it will never be the treasure that we have right now, not within my lifetime, or ever. Once it's gone it's gone. As stewards of our natural environment, we citizens of Sacramento must be ethically and morally conscientious about our ecological kinship with this natural setting, the American River Parkway in its entirety, which we cherish and hold dear as a unique and precious gem of our city. It must be preserved and protected.

Please keep in mind the vision of Effie Yeaw, one of the original founders of the American River Parkway, that this natural habitat be protected for all generations.

Thank you.

Barbara Domek

College-Glen neighborhood

Watt Ave access parkway user.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 12, 2024 11:25 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Angel Ball <gacball@sbcglobal.net>
Sent: Monday, February 12, 2024 11:21 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; Angel Ball <gacball@sbcglobal.net>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

I do not support the devastating methods being proposed to address potential 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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that

requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on

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

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and "planting benches", for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings -- could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river's edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities." Among the values noted was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees." Part of what makes this "riparian hardwood strip" so valuable for recreation is that "the riparian vegetation is carefully protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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,

Angel Ball

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 13, 2024 9:30 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Regarding American River projects SEIS/SEIR

From: Eve Abrahams <realestatebyeve@gmail.com>
Sent: Tuesday, February 13, 2024 9:21 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Regarding American River projects 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.

A | When I moved to this area it was because of the parkway and the ability to be out in nature while still living in the suburbs and being close to an urban area.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be

incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

My specific concerns and comments include the following:

- B • 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.
- C • 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 also disrupts the nesting, mating, and feeding habits of local and migratory bird populations and large, mature trees provide essential nest cavities that would be lost.

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.

Eve Abrahams



Eve Abrahams
HomeSmart ICARE Realty
Lic #01203305
Direct (916) 359-6596
Cell: (916) 397-8469
www.RealEstateByEve.com



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From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 13, 2024 7:53 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Our American River

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

From: Kathleen Cochran <kmcochran11@icloud.com>
Sent: Tuesday, February 13, 2024 7:42 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Our American River

[You don't often get email from kmcochran11@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

1 | I am very concerned that the barbaric destruction that the USACE calls "flood control" will continue. Mowing down all vegetation and habitat along the American River can not be the solution.
I'm sure it all comes down to cost and creativity. Please consider an alternative to this heinous act.
I once loved visiting the river at Paradise Beach, now it's an open wound.

Sincerely,

Kathleen Cochran
Citizen of Sacramento

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 13, 2024 3:15 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS; Romine, Guy K CIV USARMY CESPK (USA); Toland, Tanis J CIV USARMY CESPK (USA)
Subject: [EXT] FW: Map, maintain, replace social trails and beaches, small watercraft put-in and take-out points, use only round cobble and gravel for these access points.
Attachments: Layout_rev3.pdf

From: Avery, William E <averyw@csus.edu>
Sent: Tuesday, February 13, 2024 1:49 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Liz Bellas <bellase@saccounty.gov>; Sorgen. KC <sorgenkc@saccounty.gov>
Subject: [Non-DoD Source] Map, maintain, replace social trails and beaches, small watercraft put-in and take-out points, use only round cobble and gravel for these access points.

To Whom it May Concern:

1 The American River Parkway is replete with unofficial trails and beach access points. These “social trails” are an essential aspect of the Recreational Outstandingly Remarkable Values (ORV) used to identify the Lower American River as a Wild and Scenic River by state and federal definitions. Not only are they protected under state and federal law but they are beloved by thousands of hikers, birders, and boaters who use them to launch small watercraft such as canoes, kayaks and paddle boards. They offer refuge and safety for wildlife and rest stops for countless tired rafters as well. The planned bank clearing, bulldozing and riprapping the river’s edge with launchable riprap toes will obliterate these trails, destroy access for countless hikers and ruin the possibility of safe access or egress from the river by swimmers or small watercraft.

2 In USACE Contracts 1 and 2 and 3A no attempt was made to replace the social trails that existed prior to project completion. We want to see something different in the area of

2
Cont'd

Contract 3B. We want to see the social trails and beaches mapped out by Sacramento County Regional Parks and USACE so that they can either be protected during the project or carefully replaced and restored to functionality after the project. We ask that the beaches either be allowed to retain their natural character or be replaced with watercraft friendly and people friendly round cobble and round gravel. Trails should be walkable and retain their natural character or be replaced with some sort of hiker friendly material such as small sized gravel or decomposed granite.

By carefully surveying with GPS, American River Trees has created a Draft working map of the known social trails and river access points that will be impacted by the bank clearing and riprapping proposed by C3B. This map is geo referenced with GPS and can be used with tracking programs such as AvenzaMaps.

We ask that USACE coordinate with Sacramento County Regional Parks to protect, and retain the general character, of all the trails and river access points depicted in the map below:

Thank you,

William E. Avery, PhD
Professor Emeritus. CSUS

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 14, 2024 9:02 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American river common

From: Hillary Parker <lovenlifehillstyl@yahoo.com>
Sent: Wednesday, February 14, 2024 8:05 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American river common

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

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

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

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

The American River Parkway is extremely valuable to me.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of

isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

Loss of habitat for native wildlife and plant species.

A Loss of use for me and my family !! We specified moved to this neighborhood for the use of the trail at the American River Parkway and its beauty. If you take it away, I will move.

Opening the area up to invasive species which will spread in to our yards

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.

Hillary parker long time park way area resident

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 14, 2024 9:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Public Comments draft SEIS/SEIR Lower American River projects Contracts 3B, and 4A and 4B.

From: LESLIE WATTS <leslie.watts@prodigy.net>
Sent: Tuesday, February 13, 2024 9:41 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Public Comments draft SEIS/SEIR Lower American River projects Contracts 3B, and 4A and 4B.

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The American River Parkway with its bucolic woods and wildlife are extremely valuable to me. I emphatically oppose the devastating methods proposed to address potential bank erosion concerns. I object to the irreplaceable loss of rare wild vistas and of the aesthetics of this pristine area of the Parkway. I am appalled at the potential long-term loss of quality and access for recreation (e.g. hiking, dog walking, fishing, picnics, kayak and canoe access, bird and wildlife viewing, photography, solitude, respite for mental health, and many other uses) for miles along the river's edge.

The environmental impact analysis has not adequately addressed the loss of dozens of shaded trails, unofficial but well used small beaches, and riverside access trails. Miles of habitat destruction threaten the riparian corridor that is vital to sustaining wildlife in an urban area (e.g. 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 Department of the Interior and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the *intrinsic* conditions which make it a State and Federal Wild and Scenic River. I particularly object to the extreme destruction of over 500 trees in Contract 3B-South alone, potentially including heritage oaks over 200 to 300 years old 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. In the 2016 General Evaluation Report comment responses, the US Army Corps of Engineers (USACE) said they would minimize impacts to vegetation, but stretches near River Park have been basically clear-cut by the Project.

The USACE Contract 3B, extends east from Howe Avenue 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 even 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.

Furthermore, I believe the USACE approach to destroying miles of intact trees and vegetation which currently provide self-renewing natural defenses 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 in actuality 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.

I am writing to insist that the US Army Corps of Engineers perform a more adequate 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 is presented. 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. Furthermore, I do not see that the environmental analysis adequately characterizes the significant impacts nor provides adequate mitigation to be considered "insignificant," nor considers all feasible alternatives to supposed "unavoidable" impacts, including considerations of a much more focused scale than the overall project.

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.

I believe that the Sacramento Regional Parks and the National Park Service should make a determination of “inconsistency” with the Wild and Scenic Rivers Act and impose strong conditions that require the US Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B. It will be decades before the vegetation, particularly trees, begin to resemble all that will be destroyed, which will be long after I will be here to enjoy it once again.

The decision to use a miles-long, continuous set of launchable rock toes and trenches 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 adjacent to an elementary school, and the unaccounted for loss of additional trees due to “access ramps” that will be necessary 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 versus 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.

Implementation of this Project will subject the surrounding neighborhood, adjacent houses, and a nearby elementary school to unimaginable impacts of noise, vibration, air pollution, loss of access to Larchmont Park and to the coveted riverbank environs. This impacts those who work and/or study from home, home-schooled children, as well as children who attend indoors/outdoors at O.W. Erlewine Elementary School. Although construction of the Project would occur over two years, each site would have over 100 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 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. The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and this school. 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)).

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

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

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

The US Army Corps of Engineers must reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, focused alternative methods for project subcomponents; then conduct a more 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.

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 for considering these comments.

Sincerely,
Leslie A. Watts

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 14, 2024 8:55 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Charlie stein <cstein.cs@gmail.com>
Sent: Tuesday, February 13, 2024 4:19 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River projects 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 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.]

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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish

and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

[ADD NAME AND INFO]

SARA
Save the American River Association
8836 Greenback Lane, Ste C, Orangevale, CA 95662
SARARiverWatch.org (916) 936-4555

February 13, 2024

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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

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

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

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

The American River Parkway (ARP) is extremely valuable to me. Since moving to Sacramento County in 1981, and shortly

A

thereafter, discovering the American River Parkway, I have benefitted directly by cycling, walking & paddling many portions of the 31-mile long Parkway, at least six days of most every week. The Parkway is the primary reason our family has planted our roots here. The native tree canopy along much of the ARP bike/ped trail along the river not only offers shade during our hot months and provides important habitat for the numerous wildlife species within the ARP. The variety of visible wildlife present is yet another attraction and the abundance of nature is stunning.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures

be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

My specific concerns and comments include the following:

- B • The native mature trees along the banks of the American River are not only beautiful, but provide shade, habitat and excellent nesting sites, for birds of all sizes, and especially the American Bald Eagles, which have returned to this area and established several nesting sites that they return to annually to continue the repopulation of bald eagles to the ARP.
- C • Since much of the soil on the banks of the American River is very dense with clay, unlike the soils in New Orleans, the roots of the large mature trees actually hold the soil together and should not be removed.

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

Sincerely,

Warren V. Truitt,
Past President & current VP
SARA

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 8, 2024 11:21 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Tanya Khemet Taiwo <tkhemet@gmail.com>
Sent: Thursday, February 8, 2024 10:05 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) 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 am writing to implore that the US Army Corp of Engineers perform a more adequate 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 less destructive approach to Erosion Control Projects 3B and 4 is presented.

2 | We have seen destructive flooding in our state over the past few days as a result of atmospheric rivers. The severe weather systems as well as the scale of the devastation that many communities and families have experienced can be traced back to our lack of consideration for the environmental impact of our choices for development and planning. I know that we are all concerned about the potential for flooding and understand the urgency to find solutions. However, the solutions should not create more problems than they are trying to solve. Long lasting effective solutions can only be achieved with careful rigorous analysis of impact. The loss of hundreds of trees will be a devastating loss that will be experienced by our grandchildren and their descendants who will be stuck with finding solutions to the problems we have left them.

Let's do the needed diligence grounded in rigorous science needed to address the potential flooding and find a solution that we won't regret.

Tanya Khemet Taiwo PhD, MPH

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 4:23 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: LINDA BOND <lbond7@comcast.net>
Sent: Friday, February 16, 2024 3:41 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) 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 | Having lived in Sacramento for decades and raised my daughter here, the American River Parkway is extremely valuable to me. I am wondering 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 am very concerned about 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 for your consideration of this email.

Thank you.
Linda G. Bond

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 4:22 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Abbey Borstad Biehl <abbeyborstad@gmail.com>
Sent: Friday, February 16, 2024 2:52 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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 recreate along the levee almost everyday, either walking by myself for exercise and fresh air, or walking with my dog. I would hate to see the beautiful river parkway destroyed by removing the trees.

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,
Abbey Biehl

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 4:21 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Peggy McKeon <bucknpeg@gmail.com>
Sent: Friday, February 16, 2024 2:48 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.

A I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. You and I are well aware of the number of citizens who enjoy the American River Parkway so I'm just going to address what it means to our family.

The American River Parkway is extremely valuable to us in many ways. My husband and I frequently walk along a variety of the many trails that run alongside the American River Parkway. It is certainly excellent exercise but

it is also a way to commune with the flora and fauna we, here in Sacramento, are so very fortunate to live near. Additionally, our son, his wife, and two young boys spend countless hours during the winter wandering along the Parkway. However, the joy that comes with playing in the water during our hot summer months cannot be emphasized enough. Our grandson who lives in Southern California loves visiting Sacramento just so he can fish along the banks with his uncle.

B Clearing the American River Parkway of virtually all of the trees, all of the underbrush, and all of the wildlife will destroy this gem that nature has given us.

I cannot believe that in this time of dramatic climate change, the USACE is unable to devise a more natural way to protect the areas that surround the Parkway than clear-cutting the trees that line the banks of the River. We know the contributions trees make to lowering temperatures.

Destroying the American River Parkway will only make our situation more dire.

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.

Peggy McKeon

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 12:51 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Veronica Kaufman <veronicak5678@gmail.com>
Sent: Friday, February 16, 2024 11:36 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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,

Veronica Kaufman

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 9:03 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: Gayle McNicholas <gaylemcnick@gmail.com>
Sent: Friday, February 16, 2024 5:51 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

THE ACTIONS you propose remind me of what has happened to lands along rivers and oceans, particularly in the southern US. The trees and other plant life were removed for purposes that were to help make life better for humans. Look at what happened where Lake Pontchartrain is in New Orleans. Because of human's selfishness the protection to inland areas was gone when the hurricane hit. Wildlife disappeared because their habitat disappeared. Devastating flooding destroyed so much of the area and people were displaced — some permanently!

DO YOU NOT UNDERSTAND that the places on the river appeared as they do for natural protection and homes for our fellow animals? DON'T MESS WITH OUR NATURAL ENVIRONMENT IN WAYS THAT WILL REMOVE/DESTROY IT. PUT YOUR HEADS TOGETHER AND COME UP WITH A MORE NATUE AND HUMAN FRIENDLY WAY TO COMPLETE YOUR PROJECT.

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

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of

Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were

used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully

protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

Thank you.

Gayle McNicholas

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:58 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Christopher Smith <crhistofer9727@gmail.com>

Sent: Friday, February 16, 2024 12:11 AM

To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>

Cc: PublicCommentARCF16@water.ca.gov

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

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

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

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

I've loved our rivers, nature and wildlife in the Sacramento Valley my whole life. In my 29 years I have seen so much change at my favorite spots and it's deeply saddening.

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

Thank you.

Christopher Smith

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:58 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Rainbeau Lee <staypuft508@gmail.com>

Sent: Thursday, February 15, 2024 11:03 PM

To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>

Cc: PublicCommentARCF16@water.ca.gov

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

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

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

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

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

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings -- could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

Thank you.

[NAME]

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:57 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Kate Anderson <katelaurena@gmail.com>
Sent: Thursday, February 15, 2024 9:47 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

I love to ride my bike through here and observe all of the wildlife from turkeys to coyotes to foxes that live in this amazing habitat.

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

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

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Thank you.

Kate Anderson

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Sent: Friday, February 16, 2024 8:55 AM
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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: Jacob Wren <jacobjwren@gmail.com>
Sent: Thursday, February 15, 2024 9:01 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
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Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted

and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

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

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

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

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

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

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

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

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

Thank you.

Jacob Wren

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:55 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Gwendolyn Wren <gwendolynwren0@gmail.com>
Sent: Thursday, February 15, 2024 9:00 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

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

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

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

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and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

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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.

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Thank you.

Gwendolyn Wren

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:53 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Karen Z <karenzamd@gmail.com>
Sent: Thursday, February 15, 2024 8:29 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

I live a couple blocks from the river and walk the trails most days.

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

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

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modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:49 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: Christie Vallance <christiev44@gmail.com>
Sent: Thursday, February 15, 2024 8:18 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:
My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. Section 3B is my home and is very important to me. I moved into my home in East College Greens to be near the river trails and bike trail.

My family and I use this area almost daily for our health and wellbeing. We hike, bike, birdwatch, take nature photos, and swim during the summer.

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.

I am concerned about this project:

- B** • I moved into this neighborhood (east College Green) to be near the hiking trails and bike trail along this special section of the American River Parkway.
- B** • The impact analysis in section 3B from Howe Avenue to Mayhew Drain of the document does not analyze the recreational impacts to me and my family’s health and wellbeing as we use these trails often. We use the trails almost daily. We swim during the summer months. I see many people hiking, wading, bringing kayaks and canoes to use this area. I avoid the rip-rapped banks like the ones this project is using and do not see others using it. Can the project actually improve river access, instead to limiting it?
- C** • Recreation is listed as one of the concepts for management of this area. This project should analyze alternative nature-based solutions to enhance recreational access. This area is home to over 150 species of birds. Over 40 bird boxes that have raised many species will be lost with habitat destruction. Some of these areas can be protected. Many 200- and 300-year-old trees are slated to be removed, some Heritage Oaks. Can you mitigate the impact to the trees?
- D** • I feel more research needs to be done if this project is actually effective. I notice erosion on already completed clear cut areas near Sacramento State University.
- The goal isn’t to stop all environmental impacts but it is to allow the public discussion about the project’s consequences and how to avoid them. As a decision maker, please take all this into consideration.

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 a gift to the many people who enjoy it. These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

Christie Vallance

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:38 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Samuel Barnett <sammybarnett66@gmail.com>
Sent: Thursday, February 15, 2024 7:25 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

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

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

Respectfully,

Sam Barnett

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:37 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source]

From: Vicki Rinne <vrinne13@gmail.com>
Sent: Thursday, February 15, 2024 6:56 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source]

I am writing to stress the importance of more environmental impact study on the proposed USAC E3B along the American River Parkway.

1 I strongly urge the US Army Corp of Engineers to perform more adequate environmental studies of the many
2 and significant impacts of the proposed project and not go forward with 3B and 4 until there is a more
thoughtful and less destructive approach to the erosion control projects. There also needs to be more
documentation to show adequate details for what needs to be done.

3 There are many concerns and here are a few. These include local wildlife including birds, beaver, otter,
bobcats, coyotes, turtles, deer, squirrels and snake, to name a few. Decimating this stretch of the river not only
4 destroys their habitat and threatens their existence but will send many into the neighborhood causing further
problems and suffering for all. The pollution caused by the many diesel trucks that will travel to and from our
5 neighborhood and will need to be on site are highly toxic especially for the very young and the very old. The
oaks are irreplaceable and will not come back for many years. The area is loved and used by bikers,
swimmers, joggers, kayakers and boaters. It is used for fishing and much more. It is our crown jewel and
should not be destroyed for any reason.

6 We need more information and more study about how to achieve flood safety along this glorious stretch of
river before this area is destroyed like other stretches around the H Street Bridge and Paradise Beach.

Sincerely,

Vicki Rinne

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 16, 2024 8:36 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Army Corps of Engineers clear-cut plans along the American River Parkway

From: Katherine Domek <gdomek@pacbell.net>
Sent: Thursday, February 15, 2024 4:43 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Army Corps of Engineers clear-cut plans along the American River Parkway

I am deeply concerned to hear about the Army Corps of Engineers plans along the American River Parkway!

1 As you may know, The Army Corps of Engineers is planning to clear-cut/bulldoze all trees and vegetation along the American River Parkway from Howe Ave. to beyond Watt Ave. heading East towards Rancho Cordova. This will obliterate the vibrant, diverse riparian ecosystem we treasure, leaving behind a barren wasteland (just like they did to the area by Sac State and the River Park neighborhood. Go look at the devastation over there). Even if they do "re-landscape" the stripped dirt, the mature heritage Oaks and wildlife habitat will be gone forever.

2 There are other methods of soil erosion control they could implement, called Targeted or Selective thinning and bank reinforcement at specific identified spots that may show risk of erosion, while leaving stable areas unaffected. This approach would save hundreds of trees and preserve wildlife habitat. But apparently it's faster and cheaper for them to just bulldoze everything in their path. They plan to bulldoze 11 miles of trees!

Please let them know why the parkway's trees and wildlife are important to you, and tell them to consider less severe, more targeted methods of erosion control that would preserve some of these natural areas.

Sincerely,
Katherine Domek
Sacramento resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 4:14 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Beverly Thomas <bev53th@gmail.com>
Sent: Thursday, February 15, 2024 4:12 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR)
My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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

A

I have cherished our American River Parkway, which is the gem of Sacramento, CA. I bike, hike, watch birds and other wildlife, but now I am learning how to fish. Fly Fishing is catch and release so that the fish population can grow. Our club California Fly Fishing Unlimited (CFFU) believes in conservation. Your erosion control will take years for the Parkway to get back to it's natural beauty. We have natural Salmon habitat with protected banks for the eggs and alevins to develop. Exposed banks can be warmer and less protected. The trees and bushes are needed near the banks! All wildlife needs this protection.

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other

reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were

basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

Thank you.
Beverly D. Thomas

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 12:50 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Ruth Tesar <ruthtesar@gmail.com>
Sent: Thursday, February 15, 2024 12:45 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

A I have enjoyed this part of the parkway since 1992. It is part of my family's history. The habitat is unique and should not be destroyed. Interestingly, my insurance company deemed that I did not need flood insurance as I was not in a 100 year flood plain, even though I live on the levee. I would like to see more data supporting the need for such a drastic renovation.

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

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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

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Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

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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.

Ruth Dean Tesar
4020 Crondall Drive
Sacramento 95864

Ruth Tesar

To: ARCF_SEIS@usace.army.mil
Cc: PublicCommentARCF16@water.ca.gov
Bcc: AmRivTrees@gmail.com

Subject: Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

Dear US Army Corps of Engineers and Dept. of Water Resources Comment Recipients:

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

The American River Parkway and its woods and wildlife is extremely valuable to me. I value the trails, trees and all of its inhabitants. 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 easible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

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

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Further, I believe **the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less.** The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms). Furthermore, there is

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

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

I object to **the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway;** and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the **Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981)**. In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that **“the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.”** Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil. The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis. The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement. If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated. This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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 American River Parkway is a gift to the many people who enjoy it.** 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.**

Michael Rex

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 11:31 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Carrie Rohrbach <carrie@empoweringeducator.org>
Sent: Thursday, February 15, 2024 10:55 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) 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 moved to Sacramento in 2019 after living in the DC area for 15 years and doing restoration work on the Anacostia River. I was so pleased that Sacramento housed not one but TWO beautiful rivers with pathways accessible for walking and biking. Residents of Sacramento, including scaly and furry friends, all benefit from the natural vegetation that grows along the American River Parkway, which can be further adapted to address the erosion concerns.

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 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.

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,

Carrie Rohrbach (she/her)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 11:30 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comment on American River SEIS

From: Fred Kindel <f.kindel@att.net>
Sent: Thursday, February 15, 2024 10:47 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comment on American River SEIS

1 Corps & DWR should include Environment Restoration principles into this levee restoration. Mature trees should be retained, significant lower story vegetation should be restored & other useful environment restoration techniques should be incorporated. Standard engineering of levee & bank protection should be modified to incorporate Environment Restoration. Added expense should be assigned to Environment Restoration Account. Environment Restoration is now a co-equal mission assigned to USACE by Congress--Sacramento should combine this mission with flood protection mission here on American River. We need Sacramento to step up & use Environment Restoration Mission to improve the same ol' same ol' levee restoration/bank protection underway since 1960.. Let's keep our beautiful American River beautiful.

Thank you,
Fred Kindel, Folsom, retired environment planner Sacramento District USACE

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 9:53 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Ewing, Nicholas <nnewing@csus.edu>
Sent: Thursday, February 15, 2024 9:49 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

I have lived on the American River here in Sacramento since 1964. I raft and kayak rivers around the world and always marvel at what an incredible natural river we have here. To be able to step out of an urban environment into what feels like wilderness at times and is full of wildlife is incredible. Before my retirement from the Department of Biological Sciences at Sac State I was able to commute by bike to campus and soak up that natural beauty and my wife commutes along if every day still on her way to work as a physician. Now that I am retired I am on the river every single day that I am home and in the last few days have seen bald eagles, otters, a bobcat, beavers, sea lions and a wonderful array of plants and birds. I touch bases with plants and trees that are like old friends. Some of them I hung rope swings from as a kid and that my kids did the same. Some out my back door were likely good size and loved indigenous people before John Fremont and Kit Carson made their way along the river. I watch the changing seasons with the changes in the plants and animals and the rising and falling of the river. I feel so incredibly lucky to have this wonderful river out my back door. Its accessibility for all of us in Sacramento is a gift. We don't have to get in our cars and drive far to experience a beautiful place. This river has instilled a love of the natural world in my children. At a time when we see the damage caused by climate change in wild areas everywhere this place is a sanctuary. With the work that is proposed the natural beauty of our beloved river will not recover for generations!

As a careful observer of the river I have watched all of the major flood events beginning with the high water of

1964. I have walked the banks and paddled at all but the very highest water levels (as an experienced big water rafter I am able to do that safely). I question the conclusion that removing the trees and replacing them with what may well be reduced to rip-rapped banks after high water events will protect us from flooding. It is clear that the trees that are in place provide a great deal of erosion protection—as the Corps recognizes since plantings are done specifically for erosion protection. Will the work like that done in the first phases below Howe Avenue be protective? If we have high water events in the years before plants become established it appears to me that we will be at risk. There is already significant erosion of the new work simply from moderately heavy run-off from rains! It seems the project area will be vulnerable for years.

We have invested massive amounts of money in modifying the spillway on Folsom Dam and now in raising it. Hasn't this work increased our flood protection sufficiently?

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to

require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river's edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities." Among the values noted was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees." Part of what makes this "riparian hardwood strip" so valuable for recreation is that "the riparian vegetation is carefully protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

Thank you.

Nicholas Ewing, Ph.D.
Professor Emeritus
Department of Biological Sciences
California State University, Sacramento

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 9:24 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Tree and Wildlife Destruction.

From: Robin <rpasterski@comcast.net>
Sent: Thursday, February 15, 2024 9:22 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: rpasterski@comcast.net
Subject: [Non-DoD Source] American River Tree and Wildlife Destruction.

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, our community, the health of our environment and all the wildlife that use this area.

Destruction of this natural area cannot be undone:(

Robin and Trent Pasterski

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 8:11 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices
Attachments: 1 eagle.png; 2 eagle.jpg; 3 eagle.jpg

From: Eric Schmidt <ericschmidt51@yahoo.com>
Sent: Thursday, February 15, 2024 7:19 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

PLEASE READ. THIS IS URGENT. AND LOOK AT THE PHOTOS. THEY ARE SPECTACULAR.

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

When my family and I moved to Sacramento 8 years we fell in love with this stretch of the river. We live on Stansberry Way near Larchmont Park. It became our little jungle. My kids were younger back then of course but now they use this area as a place for hiking, fishing, swimming and connection with friends and family. It was and still is a wonderful outdoor space for our kids and us to see nature and get the exercise that we need. We love the trails and wild life and of course the water that is so close to our home. Areas like this are what make Sacramento so unique in California. We love the river as it is. Please don't turn it into a canal.

B

As I mentioned, we enjoy seeing wildlife that lives and / or enters this area of the river. Several months ago as I was taking my daily walk along the river I spotted an eagle (see attached photos). It had pulled a fish out of the river and was trying to get to a spot where he could eat it in peace. It was beautiful. If you destroy the trees - no more wildlife experiences like this and undoubtedly...no more wild life. This work that is being proposed will literally kill off some of the living creatures that reside here.

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.

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.

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.

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.

Eric & Amy Schmidt

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 8:06 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 Williams <vidjimw2@gmail.com>
Sent: Wednesday, February 14, 2024 11:10 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):
My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.
The American River Parkway and its woods and wildlife are extremely valuable to me.

I've lived here forty years and have rafted, kayaked, bicycled, and walked these areas.
There are cities across America that would love to have this kind of access to nature but simply never will. We cannot lose this. It is here because others have fought to have it. Please continue that fight.

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

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

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§

21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of

the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data. Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms). Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or

travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement. If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected. The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.
James Williams

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 8:05 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Concern

From: Mer Mills <mermurf@yahoo.com>
Sent: Wednesday, February 14, 2024 9:15 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Concern

To Whom it May Concern,

1 The work on the levee associated with the American River Common Features, 2016 Flood Risk Management Project, Sacramento, California is an important work to reduce flood risk. After trees being cut down and private fences and non-private fences being removed (which has caused an increase in the amount of people near the river) there has been an impact on the variety and amount of wildlife along the river in the Pocket area. Is there more that can be done to protect these animals and their habitats?

Thank you!

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 8:02 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source]

From: Eric Webb <ewebb1724@gmail.com>
Sent: Wednesday, February 14, 2024 7:56 PM
To: PublicCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source]

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

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

A The American River Parkway and its woods and wildlife are extremely valuable to me. It also should be noted that the current project rests not only on Native American sites, but also the historic Gold Rush township of Brighton, The nearby heritage oaks date from this time period and aside from the myriad environmental concerns, the area is overdue for historical interpretation. The project requires a less draconian approach in favor of more surgical measures. Although archaeological sites may not be present, historical documents indicate the importance of the area. Perhaps this could be reviewed under the National Historic Preservation Act?

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 at a much more fine-grained scale than simply the overall project.

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

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

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

Thank you.

Eric Webb

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 8:04 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Fw: Comments Regarding American River

From: Ellen Springwind <espringwind@yahoo.com>
Sent: Wednesday, February 14, 2024 9:08 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Fw: Comments Regarding American River

- To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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

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

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

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

The American River Parkway is extremely valuable to me /

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

I am concerned that this massive project will irreparably destroy the eco system that is crucial to the river, woods and wildlife for many miles.

A I request that this project be halted until it can be reviewed and revised to respect and uphold the integrity of the entire environment and the people, trees, wildlife and river it affects. I demand that those responsible consider the immensity of the long lasting devastating effects on all levels that this could have on the American River and its inhabitants and friends.

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.

Sincerely,

Ellen Springwind Smith

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

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

My comments focus on the lower American River projects of the draft
SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. I have serious
concerns with the proposed project and the draft SEIS/SEIR
environmental analysis.

The American River Parkway is extremely valuable to me.

***I personally visit the American River parkway several times a week and
consider it key to my mental health and well being. I have grave
concerns that the wildlife and river eco system will be irreparably
destroyed if this project goes forward with it's present plan. I demand
that it be revised with the responsible and needed long term vision for
the preservation of this irreplaceable environmental gem.***

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.

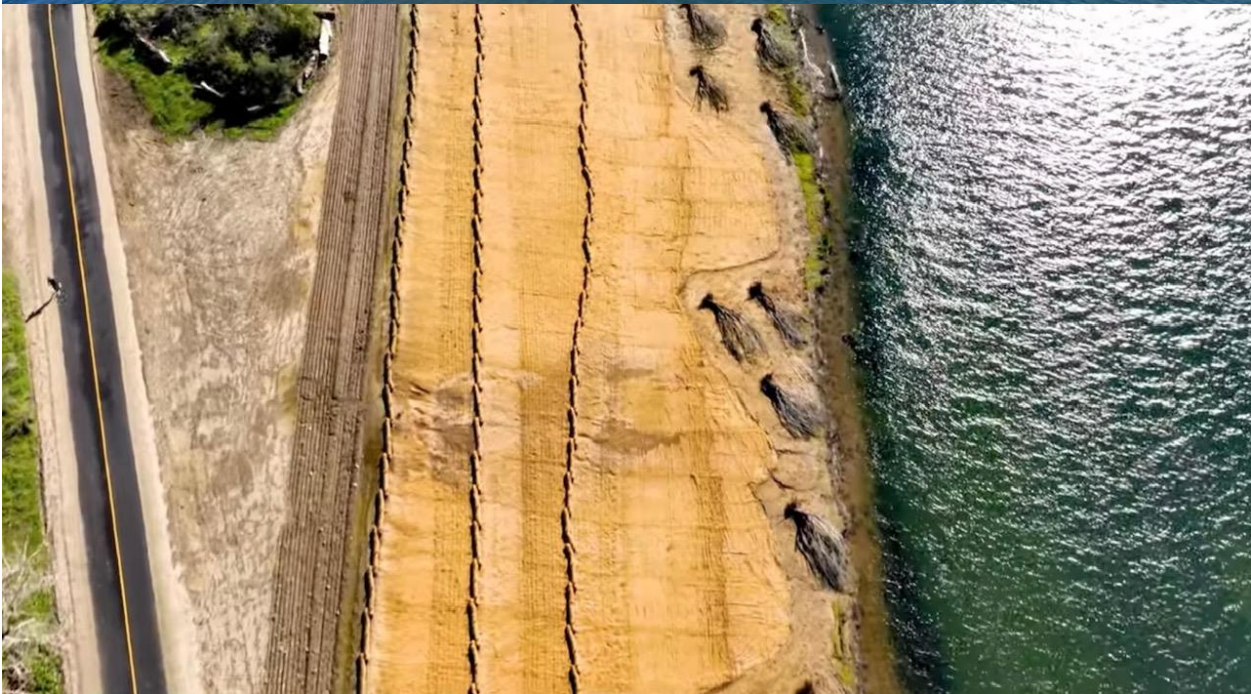
Ellen Springwind Smith

Dear Army Corps & DWR/CVFPB,

My name is William Brattain, P.E., and I am a resident near the proposed work along the Lower 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 *Draft American River Common Features, 2016 Flood Risk Management Project, Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV* (Draft SEIR). I have already submitted four sets of previous comments on Draft SEIR 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, the riverbank thickness at Larchmont Park River Mile 10.3-10.5, and compliance with the federal Wild and Scenic Rivers Act for the proposed work under Contract 3B. The comments in this submittal focus on the performance of the erosion work done under previous contracts during the summer of 2022 downstream of the Howe Avenue Bridge, and how that should be affecting decisions on performing similar work under Contract 3B.

During 2022, Army Corps performed erosion work on several miles the north and south banks of the river Lower American River downstream of the Howe Avenue Bridge. This work involved the removal of all existing trees and vegetation in the work area, massive soil disturbance, riprap installation, planting of trees near the normal flow waterline, and the installation of straw wattles. Since that time, Army Corps has been posting *American River Erosion Monthly Update* documents on their website. The most recent December 2023 update states "Another successful construction season has come to an end, bringing a new level of flood protection to the communities surrounding the American River", and "Revegetation is complete at site 2-1 with natural recruitment in the planting benches at the water's edge exhibiting strong, vigorous growth."

Interestingly, this update and none of the previous updates mentions that what is actually occurring is a complete and total failure when it comes to erosion control work. I have personally visited the north and south banks of the river south of the Howe Avenue Bridge and what I found is completely astonishing. Mile after mile of barren, lifeless, and loose soil that is extremely vulnerable to erosion, and even more astonishingly, a 100% failure of every single tree planted along the waterline! They are all uprooted, dead, and lying on their sides pointing downstream! Only the ropes and chains tied to them have kept them from washing away. Furthermore, it is apparent they have been in this condition for over a year now with no mention of it in any of the erosion updates, no action to remediate, as if trees are somehow fine when uprooted and dead. It's been almost two years and so far there's hardly one blade of grass or any sign the disturbed areas will ever return to the lush forest that existed before the work was done. I have included several photos of the riverbanks in the area taken within the past few weeks showing this, as follows:



Pictures from a recent drone video. Note the erosion occurring near the waterline and the obviously dead trees. Also the complete lack of any signs of vegetative growth.



North river bank viewed from Guy West Bridge, looking upstream. Note the uprooted and dead trees and the complete lack of any new vegetation.



North river bank viewed from Guy West Bridge, looking downstream.



Note the chains are all that keeps the trees from drifting away and that the roots are completely out of the ground.

So then, one might try and argue that it's fine, there's no significant erosion going on and it will be okay. Well, unfortunately that is wrong as well. Not only is there erosion occurring along the waterline where the dead trees are located, but there is also already severe erosion occurring on the north bank just downstream from the Howe Avenue Bridge, shown in the following pictures (taken today, 2/14/2024):



1
cont'd

I do not see how anyone can conclude that this erosion work has been a success, that it is performing well, or that there is any vigorous growth going on. Certainly the tree plantings are a total failure, there is very little if any "natural recruitment" going on, and the disturbed areas are completely vulnerable to erosion and likely will be for decades to come without substantial intervention. Frankly, it may be beyond repair. The levee system is significantly less safe than it was when the natural vegetation and undisturbed soil was in place that had survived for at least hundreds of year with relatively little erosion. The Army Corps should not do anything even remotely like this in the Contract 3B area; the project needs a total rethink.

2
3 I ask that Contract 3B be suspended indefinitely. I also ask that if Army Corps is unwilling to suspend the work, that the Central Valley Flood Protection Board, as the lead agency under CEQA, demand that the work be suspended to develop a plan where trees and vegetation are not removed and the natural soil is not disturbed making it more susceptible to erosion

Thank you,

William Brattain, P.E.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 8:02 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: A Harvey <harvey3781@gmail.com>
Sent: Wednesday, February 14, 2024 8:05 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

February 15, 2024

To: United States Army Corps of Engineers
California Department of Water Resources

- 1 I am writing to request that the US Army Corps of Engineers postpone work on Contracts 3B and 4 until an adequate analysis of the environmental impacts of this destructive erosion control project has been performed.
- 2 The proposed removal of more than 500 trees, many mature oaks, and their replacement with tons of rock would cause a significant and unmitigable impact on the river environment, and the supplemental environmental impact statement fails to provide an analysis of reasonable alternatives.
- 3 The EIS' logic for the use of rip rap is based on old and discredited models embedded in the Corps' historic destruction of natural waterways by stripping and bulldozing them, then lining the banks with rock. The Corps' analysis ignores upstream improvements, including a modified Folsom Dam spillway that will allow early release of stored water in advance of winter storms.

4 | It also ignores the bank protection that trees currently provide. There is no assurance that the “planting benches” proposed as mitigation for cutting the native trees will work. They will not provide vegetation growth to shade the river and protect against increased water temperatures.

5 | Under California law, a project with significant and unmitigable impacts cannot go forward unless all feasible and less damaging alternatives have been studied. That was not done for Contract 3B and Contract 4, and further analysis is required.

Alison Harvey

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 15, 2024 8:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Ashley Root <a.r.tahoe.530@gmail.com>
Sent: Wednesday, February 14, 2024 6:43 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.

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

I do not support the devastating methods being proposed to address potential 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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

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

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

meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues.

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

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

and current requests for a commitment regarding repair and replanting in such events.

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an

outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics 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 stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental

impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct a more 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.

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.

My family has lived in Sacramento for decades and huge majority of my childhood memories are frolicking among these trees and listening to the birds. In my dreams that levee and that river are the songs of my youth and the trails I blazed. I can understand needing to thin them but removing every tree and shrub effectively removes all natural erosion protection. This project seems so corrupt I wouldn't be surprised to find it hiding underground. I would like to see a rework of the project from the ground up before condoning a project like this.

Thank you.

Ashley Rosa

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 14, 2024 3:45 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Kevin Root <kevindabox@gmail.com>
Sent: Wednesday, February 14, 2024 3:40 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

Daily, I walk along the American River and enjoy the scenery and outdoors that is in my backyard. Should this project move forward, not only will it ruin the scenery I have been enjoying for

50 years, but it will also cause an extreme amount of audible discomfort for two years. With elderly parents, heavy machinery can also kick up a lot of airborne particulate that could be dangerous to them and force them inside, unable to enjoy the outdoors in the nearby area. This area holds a lot of personal and emotional value to myself and my family.

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 at a much more fine-grained scale than simply the overall project.

I am writing to insist that the US Army Corp of Engineers perform a more adequate 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.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much

more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site would have over 100 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

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

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

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

recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long

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

recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained

alternative methods for project subcomponents; then conduct a more 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.

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.

Kevin Root

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 14, 2024 3:07 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments regarding ARCF 2016 Draft SEIS/SEIR - December 2023 Report and Appendices

From: Jennifer Enright <jennifer.helm@att.net>
Sent: Wednesday, February 14, 2024 2:32 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments regarding ARCF 2016 Draft SEIS/SEIR - December 2023 Report and Appendices

To the USACE and DWR Comment Recipients:

1 My concerns are specifically regarding the **lower American River projects of the draft SEIS/SEIR, particularly contracts 3B, 4A and 4B.** I have serious concerns about the proposed project and the draft environmental analysis.

The American River Parkway is very valuable to me. The back wall of my home is 30 feet from the top of the levee. Implementation of this project as planned will have a significant impact on my daily life, my physical and mental health as well as on the value of my property.

2 Seeing the mass destruction of trees and vegetation along the American River close to Sacramento State University / J Street / Howe Avenue (USACE project) is quite disturbing and I am alarmed that such a mass destructive effort is planned for our section of the American River as well. While I can appreciate the need to strengthen the levee where identified, surely a more targeted spot-by spot need and benefit analysis can and should be implemented - measures that are less destructive to habitat and wildlife. Please consider methods to preserve trees, particularly the heritage oaks, balancing the natural resources of the area with particular areas of erosion work that is truly needed.

3 The proposed massive influx of heavy equipment includes approximately 100 daily truck trips traveling behind my home and at the local park (Larchmont Community park) which is next to the local elementary school (O.W. Erlewine). OEHHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months. USACE should prepare a construction Health Risk Assessment to provide evidence that the project would not expose residents (and the school) to Diesel PM emissions that would result in a significant health impact.

4 USACE 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 contracts 3B and 4 until a more targeted and less destructive alternative approach is presented.

The American River Parkway is an important scenic oasis for diverse populations in our human community as well as a rich habitat for diverse species of wildlife. Please help us to care for this beautiful treasure. If you don't, it may be lost forever.

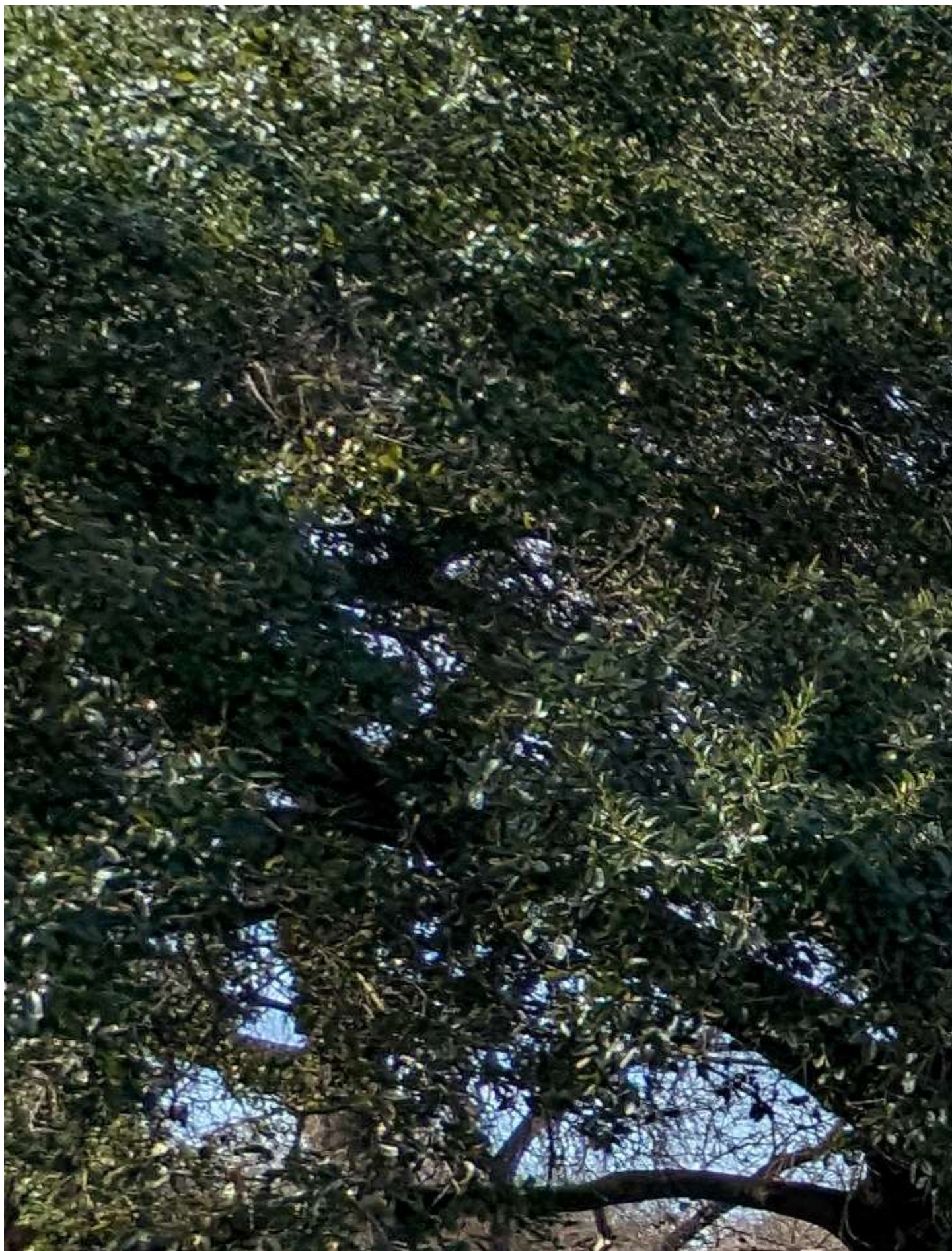
Thank you for your careful consideration.

Jennifer E. Enright

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 14, 2024 1:12 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Project 3B erosion

From: Peter Woods <pwoods008@yahoo.com>
Sent: Wednesday, February 14, 2024 12:52 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Project 3B erosion

As I walked the beautiful trail along the American river that would be bulldozed and brutalized, several people told me about the 3B plan.
So I have now come home and researched what the project is about.



There has to be a much smaller scale localized approach employed here.

YOU ARE USING A SLEDGEHAMMER TO CRACK A NUT!

I'm sure you have received many emails and understand why people are angry. I am one of them!

Please stop this project and create a much more limited one.

Thank you,
Peter Woods

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 14, 2024 12:36 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Put C3B on hold until Folsom Dam Raise Project is complete

From: Avery, William E <averyw@csus.edu>
Sent: Wednesday, February 14, 2024 12:13 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Susan E Rosebrough-Jones <Susan_Rosebrough@nps.gov>; barbara_rice@nps.gov; hbwillia44@gmail.com; Liz Bellas <bellase@saccounty.gov>; Sorgen. KC <sorgenkc@saccounty.gov>; Avery, William E <averyw@csus.edu>
Subject: [Non-DoD Source] Put C3B on hold until Folsom Dam Raise Project is complete

Put hold on C3B

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

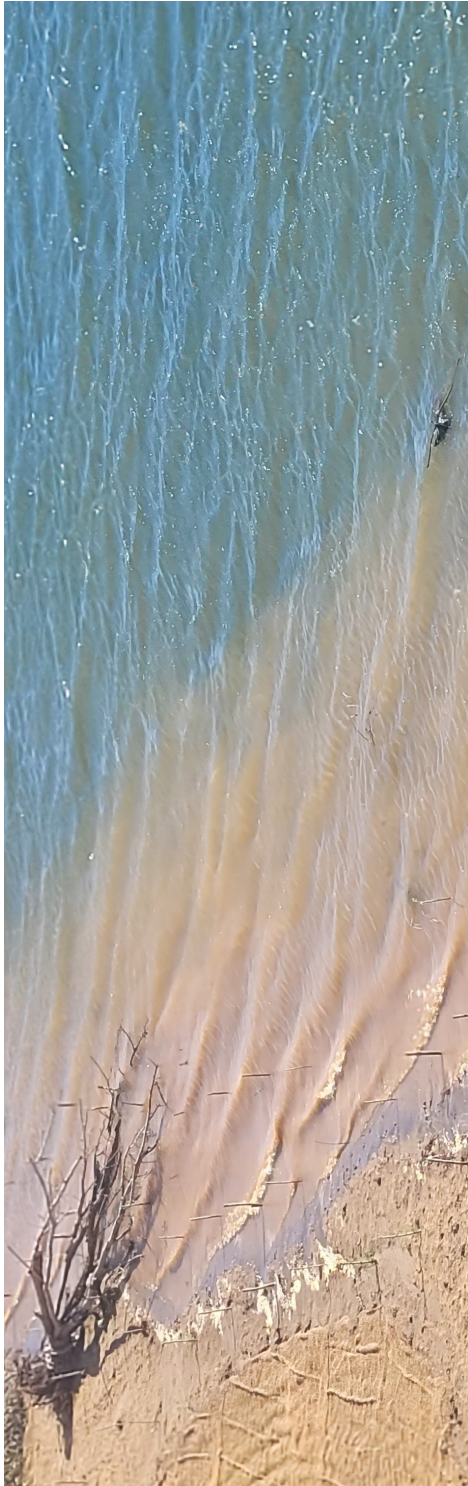
Because we don't know how well previous contract work will hold up over time or how well the onsite mitigation vegetation will fare and because when the Folsom Dam raise is completed in 2027, a 200 yr flood event will be considered to require only 115,000 cfs discharge rates at the most, which is much lower than the 160,000 cfs flood protection that the current SEIR/SEIS is trying to aim for, let's pause on further bank erosion projects, until that is finished in three years, and reassess the situation with more public involvement.

1 With as much riparian habit at stake and so much potential habitat loss and river access loss associated with Contract 3B it makes sense that we would want to know that the type of erosion protection and onsite mitigation being used actually works and does more good than harm! Current observations of the new revetment and planting benches p, as well as previous experience at other sites, suggests that the proposed methods may do more harm than good.



1
cont'd

Photos of new soil covered revetments and planting benches blown out after recent rains. This wouldn't have happened if natural vegetative armoring had been left intact.



1
cont'd

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

The Folsom Dam Raise project is still ongoing but is due to be completed in 2027. Once complete the new water control manual will be adjusted such that in a 200 year flood event, river flows would not exceed 115,000 cfs:

2

Once the Folsom Dam Raise Project is completed, the new water control manual will be adjusted to reflect the increased reservoir storage capacity created by that project. With this new storage capacity in place, modeling studies by SAFCA (2015) indicate that in a 200-year flood, maximum discharges into the American River would not exceed 115,000 cfs.

Natomas Levee Improvement Project (NLIP) USACE Project – The Natomas levees are being

Page 14 of SAFCA Final Urban Level of Flood Protection Plan and Adequate Progress Baseline Report, June 10, 2016

3

Because of the damage to riparian habitat, the destruction of the Outstandingly Remarkable Value to recreational parkway users protected by the Wild and Scenic Rivers act and because a) we don't have long-term experience with the effectiveness of the proposed erosion control methods, and instead see signs of failure and b) the project may be overdesigned for 160,000 cfs rather than the 115,000 cfs which the river banks in the area of C3B have already successfully weathered in the past and for which the Folsom Dam Raise Project is designed, let's please pause on further bank erosion protection measures, such as C3B, and wait at least five years to see how these erosion control measure continue to fare before destroying more natural vegetative armoring that would be best left intact.

4

If and when we need to reinitiate an erosion control project design phase, let's do so with full public involvement and with the American River's Wild and Scenic River status first and foremost in our list of priorities.

Thank you,

William E. Avery, PhD
Professor Emeritus
Local Resident and Professor Emeritus
CSUS
Sent from my iPad

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Friday, February 16, 2024 7:36 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Army Corps of Engineers clear-cut plans along the American River Parkway

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

From: Katherine Domek <gdomek@pacbell.net>
Sent: Thursday, February 15, 2024 4:54 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Army Corps of Engineers clear-cut plans along the American River Parkway

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

Sent from my iPhone

I am deeply concerned to hear about the Army Corps of Engineers plans along the American River Parkway!

1 As you may know, The Army Corps of Engineers is planning to clear-cut/bulldoze all trees and vegetation along the American River Parkway from Howe Ave. to beyond Watt Ave. heading East towards Rancho Cordova. This will obliterate the vibrant, diverse riparian ecosystem we treasure, leaving behind a barren wasteland (just like they did to the area by Sac State and the River Park neighborhood. Go look at the devastation over there). Even if they do "re-landscape" the stripped dirt, the mature heritage Oaks and wildlife habitat will be gone forever.

2 There are other methods of soil erosion control they could implement, called Targeted or Selective thinning and bank reinforcement at specific identified spots that may show risk of erosion, while leaving stable areas unaffected. This approach would save hundreds of trees and preserve wildlife habitat. But apparently it's faster and cheaper for them to just bulldoze everything in their path. They plan to bulldoze 11 miles of trees!

Please let them know why the parkway's trees and wildlife are important to you, and tell them to consider less severe, more targeted methods of erosion control that would preserve some of these natural areas.

Sincerely,
Katherine Domek
Sacramento resident

From: Lief, Chris@CVFPB
Sent: Friday, February 16, 2024 8:16 AM
To: Calles, Jennifer@CVFPB; Buckley, Andrea@CVFPB
Subject: Fwd: [UPDATED] Central Valley Flood Protection Board (Click to view/send)

From: Samuel Barnett <sammybarnett66@gmail.com>
Sent: Thursday, February 15, 2024 7:26:01 PM
To: Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>
Cc: Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)

[Some people who received this message don't often get email from sammybarnett66@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear President Dolan and Members of the Board and Staff:

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

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

And, I respectfully request that your Board:

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

Work with USACE to extend the public comment period to ensure the above occur;

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

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

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for

“bank erosion protection.” The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data,” and does not use advanced modern modeling to account for the protective effects of trees. I strongly

question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

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

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

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

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

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

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

Thank you.

Respectfully,
Sam Barnett

From: Avery, William E <averyw@csus.edu>
Sent: Thursday, February 15, 2024 8:04 AM
To: ARCF_SEIS; PublicCommentARCF16@water.ca.gov
Cc: Avery, William E
Subject: [Non-DoD Source] Missing figures (3.5.2-11 and 3.5.2-12) impossible to evaluate, suspend 4B

Follow Up Flag: Follow up
Flag Status: Flagged

Missing figures impossible to evaluate, suspend 4B

1 The following excerpt from the current SEIS/SEIR, regarding Contract 4B, pages 99 and 100, discuss removal of valley oak trees (*Quercus lobata*). This will almost certainly involve some heritage oak trees but it is impossible to determine which ones. This section cites proposed footprint Figures 3.5.2-11 and 3.5.2-12 but these figures are nowhere to be found, they were omitted from the document, and so it is impossible to determine the footprint of the project, which trees will be removed, etc. Thus project 4B needs to be removed from the SEIS/SEIR until these figures can be provided for evaluation and public comment.

American River Erosion Contract 4B

The need for velocity and tree scour work became clear during the risk-informed design process of American River Erosion Contract 3B North and South. As designs were already far along, it was too late to add the additional work to the American River Erosion Contract 3B North and South. Adding this work to the American River Erosion Contract 3B North and South work

would risk delaying American River Erosion Contract 3B North and South, so American River Erosion Contract 4B was created. The flood risk reduction features for the velocity and tree scour work associated with American River Erosion Contract 4B could impact trees in the area. Specifically, a mixture of valley oak (*Quercus lobata*) and non-native invasive black locust black locust (*Robinia pseudoacacia*) are within the anticipated construction boundaries. Many of the oaks are heritage oaks and are important to the local community. Currently, there are only conceptual designs in place for this work. Three different activities would be undertaken within the proposed footprint (Figure 3.5.2-11 and Figure 3.5.2-12):

- Trees would be removed to prevent tree scour. The location of each native tree species will

1 Excerpt from SEIS/SEIR, pages 99, 100 American River Erosion Contract 4B

cont'd

We ask you to please suspend or remove Contract 4B from the several projects covered by the current SEIS/SEIR until the footprint figures (3.5.2-11 and 3.5.2-12) can be provided to the public for review as is required legally by the NEPA and the EIR/SEIR process.

Thank you,

William E. Avery, PhD
Professor Emeritus, Biological Sciences, CSUS
Local Resident

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:47 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Parkway Project 3B

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

From: Steven Whitehead <smksgnl8@icloud.com>
Sent: Monday, February 19, 2024 10:08 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Parkway Project 3B

As a resident of Sacramento for 40 years one may understand my alarm when I discovered plans for project 3B. I will make it clear I do not view the project thru the lens of equations or data tables. What I can offer is some insight I have gathered as an outdoors enthusiast who regularly visits the parkway.

Firmly - I do not believe removing 500 trees and adding 'Launchable rock toes' east of Howe avenue is necessary.

1 A 'Prolonged period of high water' is your concern. If that's the case then why have I not seen examples of erosion during my last 40 plus years of running, hiking, and biking the Parkway? Yes I will admit to seeing a bank collapse at Campus Commons Golf Course but was minimal. Which brings me to my point.

2 The American River rarely flows at a high volume of water and when it does it is usually for a brief period no more than a week or so.

Additionally efforts made at Folsom Dam releasing water ahead of a period of wet weather usually alleviates the problem of unnecessary concern to erosion. The winter of 2022-23 should be used as a template as to how to manage water flows.

3 With all that being said. The riparian habitat east of Howe Ave is part of what makes Sacramento a beautiful city to live in.

I believe your efforts to control erosion should be handled in a more sensitive way working with nature and with the community in order to achieve an outcome which benefits everyone.

Yours, Steve Whitehead

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:46 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: Wendy Silk <wendy.silk@gmail.com>
Sent: Monday, February 19, 2024 9:28 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

To U.S. Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

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

1 With other local citizens, I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. 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.

2 I note that the Sacramento Area Flood Control Agency, SAFCA, had a large five year effort to change policy to allow more riparian vegetation. Based on the sum of research findings from UC Davis and California Department of Water Resources, a working group was able to develop a set of tree management procedures for the local levees. This tree-sparing effort was successfully implemented.

Sincerely,

Wendy K. Silk
Professor of Water Science and Plant Scientist, Emerita

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:40 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Opposition to Plan to Remove Trees from the American River

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

From: Cabatic<cabric@comcast.net>
Sent: Monday, February 19, 2024 6:59 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Opposition to Plan to Remove Trees from the American River

To Whom It May Concern:

- 1 I am writing to strenuously voice my opposition to the current upgrades planned for the American River Parkway. Specifically, I object to the removal of the trees between the Howe Avenue Bridge and the Watt Avenue Bridge, continuing up a mile upstream from the Watt Avenue bridge to the vicinity of Mayhew/Rio Bravo Circle on the South bank and Estates Drive on the North bank. The removal of the trees will impact the beauty of the American River Parkway, not to mention the impact the trees have on purification of the air and providing shelter for the numerous animals that live on the banks of the American River. It is unconscionable to remove these trees and replace them with the unsightly burms that currently occupy the land over by the Guy Street Bridge.
 - 2 I regularly walk on the levee with my dog and the trees provide the necessary shade for walkers and bikers that use the American River Parkway in the summer. Removal of the trees will not only be unsightly, but as I mentioned before,, it will impact the climate and the animal life of the river.
 - 3 I am totally opposed to this project. In the alternative, if it must be done, then the trees should be replaced with trees native to the river to hide the unsightly burms and provide adequate shelter for the animals living along the river.
- I hope you will seriously consider my comments.

Sincerely

Linda A. Cabatic
Resident of the Area

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:39 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River trees

From: bream <bream@omsoft.com>
Sent: Sunday, February 18, 2024 7:43 PM
To: PublicCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River trees

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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

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

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

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

The American River Parkway is extremely valuable to me.

I 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.

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!

I truly hope this plan does not move forward.

Sharon Nicodemus

Sacramento resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:38 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: Alison Slack <alison@aslackmd.com>
Sent: Sunday, February 18, 2024 6:18 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

The American River Parkway is extremely valuable to me.

A I moved to my current home on Morley Way after fleeing an abusive marriage. Not only was the proximity of my home to the American River Parkway a major selling point, but walking along the shoreline path has played a major part in the healing process for me and my daughters. We have spent countless hours riding our bikes and walking our dog along the river. The healing of the small but impactful strip of

green along the river cannot be measured. We rarely walk west of Howe because the destruction of the shoreline near Sac State is so upsetting. Not only has that area lost the healing presence of the trees and wilderness, but it has actually triggered anxiety attacks for my children who are very aware of the loss of nature all around us.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

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

- Trees are not a significant risk to levee stability. In fact, trees and vegetation provide self-renewing natural armoring of the banks that would be eliminated. Removing trees may make us less safe.
- Historically, levee failures were more associated with areas where riparian forests had been thinned or clear-cut.

- Inadequate environmental analysis of the removal of 200+ years old heritage oaks would constitute an “unmitigable” impact on the visual and aesthetic resources of the Parkway
- Destruction of vegetation worsens the heat island effect.
- “Access ramps” will destroy additional trees but were not accounted for in the draft SEIS/SEIR.

2. Rip Rapped streambanks present significant negative consequences:

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

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

- Experts disagree about the erosion risk along this stretch of the river. More empirical data was recommended, but generally concluded that erosion resistant material was present and significant scour below it was not anticipated. Seepage data show no issue for seepage, especially after the deep slurry walls were added inside the levees.
- 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 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 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 environmental justice issue has not been adequately addressed in the environmental analysis.

This project, if completed, is not only an assault on the invaluable wilderness and nature that is just a block from my home, but I fear how this destruction will affect my home value. The Sierra Oaks neighborhood is a place for families who utilize the American River Parkway every single day and our home values will be significantly impacted by destruction of a keystone part of our community.

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.

Dr. Alison Slack

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:38 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Parkway project

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

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

From: Robin <rpasterski@comcast.net>
Sent: Sunday, February 18, 2024 6:33 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Parkway project

1 | I am writing to recommend that this project be reevaluated for other options other than decimating the entire river bank and all the wild life that live there.

Sincerely,
Robin and Trent Pasterski

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:35 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: cpjr66@aol.com <cpjr66@aol.com>
Sent: Sunday, February 18, 2024 5:17 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

I fully agree with the USACE plan to protect lives, homes, and property values along the American River. Most residents are not aware of the danger of mass flooding and the death and destruction that tree roots do to weaken the solid earth supporting the banks of the American River.

- 1 Furthermore, once the supporting solid earth banks give way the entire water force going through the broken levee will be in the millions of cubic feet of water heading south with everything in its way. And if it happens in the early morning (2a.m.-5a.m) the wave of water will be sweeping away men, women, children, and their pets.

Having served as a Topographic Surveyor in the United States Eight Army in the Republic of South Korea I did notice the strength of the solid earth banks on both sides of the huge Han River that intersects Seoul from Yong Don Po. The So.Korean,s never planted tree next to the Han because, again, the root systems of the trees totally weaken the solid earth allowing water to creep around the root system and eventually cause the banks of the river to give way.

- 2 In conclusion, what follows after the banks give way is death and destruction, and we see that all over the world where trees are planted on the banks of the rivers. I would highly recommend that the USACE consider building nice walkways to shaded patio type viewing platforms running along the top to the levees with strong, 70 mile per hour wind- prove roofs, some with concrete tables, trash cans and County rest rooms, and plenty of steel or concrete benches for the full enjoyment of the millions of people who come to see, fish, canoe, and picnic in our area. Our residents love our American River setting, but we also need to have the area's trees replaced with amenities that allow us to fully view our only Blue American River.

My best,
Charles Pineda, Jr.
Retired Parole Board Judge, YOPB, BPT, U.S. Parole Commission, U.S. Dept. of Justice.

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

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

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

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

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board

access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river's edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities." Among the values noted was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees." Part of what makes this "riparian hardwood strip" so valuable for recreation is that "the riparian vegetation is carefully protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project

subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

Thank you.

[NAME]

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:32 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Adrienne Marcin <a.lizmarcin@gmail.com>
Sent: Sunday, February 18, 2024 3:57 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

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

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

I have enjoyed this part of the parkway since 1992. It is part of my family’s history. The habitat is unique and should not be destroyed. Interestingly, my insurance company deemed that I did not need flood insurance as I was not in a 100 year flood plain, even though I live on the levee. I would like to see more data supporting the need for such a drastic renovation.

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:31 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Maureen Burness <moburness@gmail.com>
Sent: Sunday, February 18, 2024 3:01 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

The American River Parkway and its woods and wildlife are extremely valuable to me. I grew up in Arden Park and rode my bicycle to the river almost every summer and weekend day to enjoy its beauty!

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

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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.

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Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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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.

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

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

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

I have enjoyed this part of the parkway since 1992. It is part of my family’s history. The habitat is unique and should not be destroyed. Interestingly, my insurance company deemed that I did not need flood insurance as I was not in a 100 year flood plain, even though I live on the levee. I would like to see more data supporting the need for such a drastic renovation.

Thank you.

Maureen O’Leary Burness

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:29 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments on SEIS/SEIR for Lower American River Erosion Work - Lack of Threat to the Levee at RM 10.4-10.5
Attachments: LAR SEIR Comments - Lack of Erosion Threat to Levee.pdf

From: Bill Brattain <bbrattain@hotmail.com>
Sent: Sunday, February 18, 2024 2:35 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: barbara_rice@nps.gov; Susan_Rosebrough@nps.gov; SorgenKC@saccounty.gov; BellasE@saccounty.gov
Subject: [Non-DoD Source] Comments on SEIS/SEIR for Lower American River Erosion Work - Lack of Threat to the Levee at RM 10.4-10.5

Dear Army Corps, DWR, and CVFPB,

1 The attached PDF file contains my sixth set of comments on the Draft SEIS/SEIR for the planned erosion work along the Lower American River under Contract 3B. Please review and respond. I am asking that the Contract 3B work at River Mile 10.4-10.5 at Larchmont Park be suspended indefinitely pending reassessment of the need for the erosion work at this location and that if it is found to be needed, that it be in compliance with the American River Parkway Plan and other requirements as noted in these comments.

Thank you,

William Brattain, P.E.

Dear Army Corps & DWR/CVFPB,

My name is William Brattain, P.E., and I am a resident near the proposed work along the Lower 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 *Draft American River Common Features, 2016 Flood Risk Management Project, Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV* (Draft SEIR), and in particular, for the proposed work under Contract 3B at River Mile 10.4-10.5, Larchmont Park. I have already submitted five sets of previous comments on Draft SEIR 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, the riverbank thickness at Larchmont Park River Mile 10.4-10.5, compliance with the federal Wild and Scenic Rivers Act, and the erosion work done under previous contracts during the summer of 2022. The comments in this submittal focus on the lack of erosion threat to the levee at River Mile 10.4-10.5 south, Larchmont Park, which is circled on the following figure:

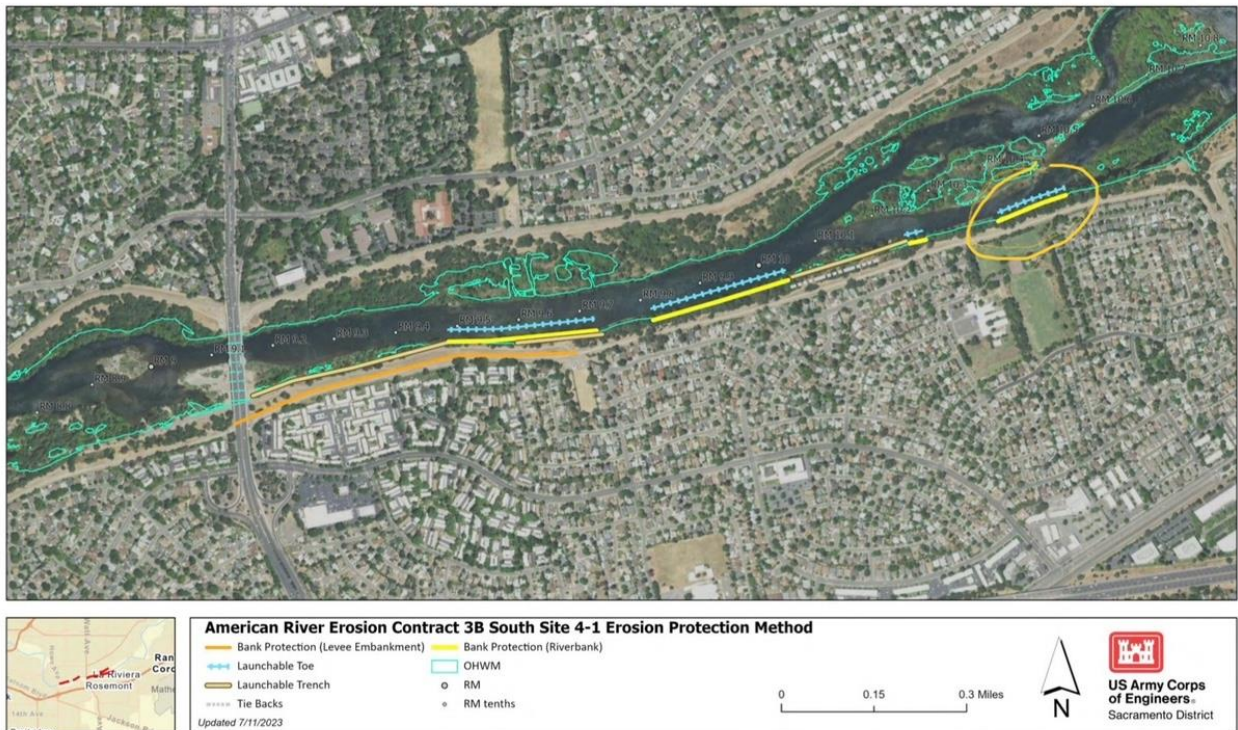


Figure 3.5.2-9. American River Erosion Contract 3B South Site 4-1 Details

The Draft SEIR states that the following work will be conducted at Site 4-1, River Mile 10.4-10.5:

1 -
Intro

American River Erosion Contract 3B South

Site 4-1 levee work would be conducted on the left bank of the Lower American River between RM 9.1 to RM 10.5 (Figure 3.5.2-10). As with Sites 3-1 and 4-2, bank protection would be

constructed on the levee and riverbank and consist of soil-filled revetment. As with Site 4-2, launchable trenches would be buried to allow site revegetation.

The description of launchable rock toe under Site 3-1 applies to Site 4-1 as well. There would also be tie backs higher up on the bench outside the launchable trench as a form of erosion protection. These tie backs are built up of revetment placed in a triangular shape. The top of the tiebacks are approximately 21 feet across, and the tip of the triangular shape is 7 feet below existing grade of the levee overbank. They are built so that during high flows, erosion would be minimized in between different types of erosion protection treatment. In addition, there are locations at Site 4-1 where there is a launchable toe at the riverbank toe (referred to as bank toe in Figure 3.5.2-9), unlike the typical launchable toe at American River Erosion Contract 3B where the launchable toe is at the edge of the planting bench (as shown on Figure 3.5.2-13). This erosion protection feature is covered in soil to allow vegetation to grow on top of it.

The design of the erosion protection features, specifically the planting benches, soil-filled revetment, and buried launchable trench allows for the site to be revegetated and used for onsite mitigation for riparian habitat and salmonid habitat. The description of onsite mitigation, excavation, ramps, tree removal, and use of excavated materials described under Site 3-1 apply to Site 4-1 as well.

1 To begin with, it's not clear from this description of the work exactly how much of the riverbank will have tree removal and soil disturbance, or where the rock/riprap will be placed, but it does seem clear that it will be substantial and destroy the recreational uses of the beach at this location. I considered preparing an entire additional set of comments regarding the vagueness of the Draft SEIR on what will be done under Contract 3B because it is not at all clear which trees will be removed, how much soil will be disturbed, and where
2 rock will be placed essentially giving Army Corps carte blanche to possibly remove all trees like in the Summer 2022 work done downstream. But, I will instead focus on the lack of necessity of the highly destructive erosion work proposed at River Mile 10.4-10.5.

3
cont'd

The decision to conduct erosion work at River Mile 10-4-10.5 appears to be based on a July 25, 2019 memorandum entitled *Lower American River Erosional Conditional Risk Assessment: Subreach 1, 3, and 4*. In that memorandum, the following conditions were noted regarding River Mile 10.4-10.5:

Segment 3: Left bank - RM 10.4-10.5

Adverse condition (1)	Favorable condition (2)
<ul style="list-style-type: none">History of bed and sill incision. History and likelihood of channel changes and higher velocity impinge on left bank. Overall a lot of uncertainty at this segment due to channel instability. Potential for encroachment into low bank at 115k-160k if bed lowers significantly at bank toe.	<ul style="list-style-type: none">Dense veg/root mats cover much of bank. Levee fully grassed and velocity and wind wave attenuated by dense shrub mass at TOB next to footpath. Coarse material in bed. 115k below landside elev.

Adverse condition (1)	Favorable condition (2)
<ul style="list-style-type: none">no revetment; narrow berm; moderately high velocities; bed lowering in area	<ul style="list-style-type: none">good past performance; vegetation on berm

Adverse condition (1)	Favorable condition (2)
<ul style="list-style-type: none">Long term trend is for additional sill degradation and RL bank over-steepening and retreat.	<ul style="list-style-type: none">Water surface elevations too low for levee breach 40-115K; water velocities low on levee at 160K cfs.

Adverse condition (1)	Favorable condition (2)
<ul style="list-style-type: none">Levee prism close to bank position. Failure/toppling of large trees due to continual erosion of lateral toe at lower flows along with drag forces on tree for higher flows could result in localized acceleration of scour into the levee prism which could lead to breach. Predominant driver in toe erosion is expected to be flows at/below 20,000 cfs so velocities from RAS do not reflect those conditions--this would be considered as a long-term destabilizing factor. Chuck and Tom stated that this reach has seen 3-4 ft of general degradation since controlling gravel/cobble bar is being eroded away (just upstream) with no replenishment coming from further upstream sources.	

Adverse condition (1)	Favorable condition (2)
<ul style="list-style-type: none">Narrow benchFlow impinging into the bankAlluvial deposit along the bankSteep bank slope	

3

Of particular note is the section I highlighted which states that the predominant driver in toe erosion is expected to be flows at/below 20,000 cfs. I agree with this assessment because I have witnessed the flow velocities at this location over the past two decades at various river flows up to 82,000 cfs and it is apparent that for flows above 20,000 cfs, the velocity of the water along the riverbank slows considerably and is no longer causing erosion. Therefore, any section of the bank above the 20,000 cfs waterline does not have flow velocities that can cause erosion. Furthermore, the soil above that part of the riverbank is extremely stable and well-vegetated making it highly erosion resistant as it has been for at least hundreds of years. Finally, the width of the riverbank from where the current edge of the erosion is to the base of the levee is over 100 feet making the erosion no threat to the levee anyway. The width of the riverbank at this location was also noted in the *2017 Lower American River Streambank Erosion Monitoring Report* as a reason why the erosion is not a threat to the levee, as follows:

4

LAR RM 10.5 Left – Erosion at this site does not currently threaten the integrity of the levee due to the existing width of the berm. However, 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. Recreational and transient activity in this

5

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Page 6



area is fairly heavy and may have an impact to observation of erosion as well as dictate the method of repair. Reestablishing vegetative cover at the site may aid in reducing erosion associated with annual flows. Erosion at the upstream portion of the site does not appear to have progressed significantly since the 2016 inspection. A 20 foot section along the downstream end of the site continues to show signs of minor erosion. Since the 2016 inspection, fewer rodent burrows were observed along the steep middle and upper bank. If erosion continues to progress at the site, a more structural fix will be required. Repair of the site will need to accommodate intense recreational use.

The downstream portion of the site has been repaired by the USACE as part of the Sacramento River Bank Protection Project (SRBPP). Repairs included placing riprap along the bank as well as planting vegetation.

6

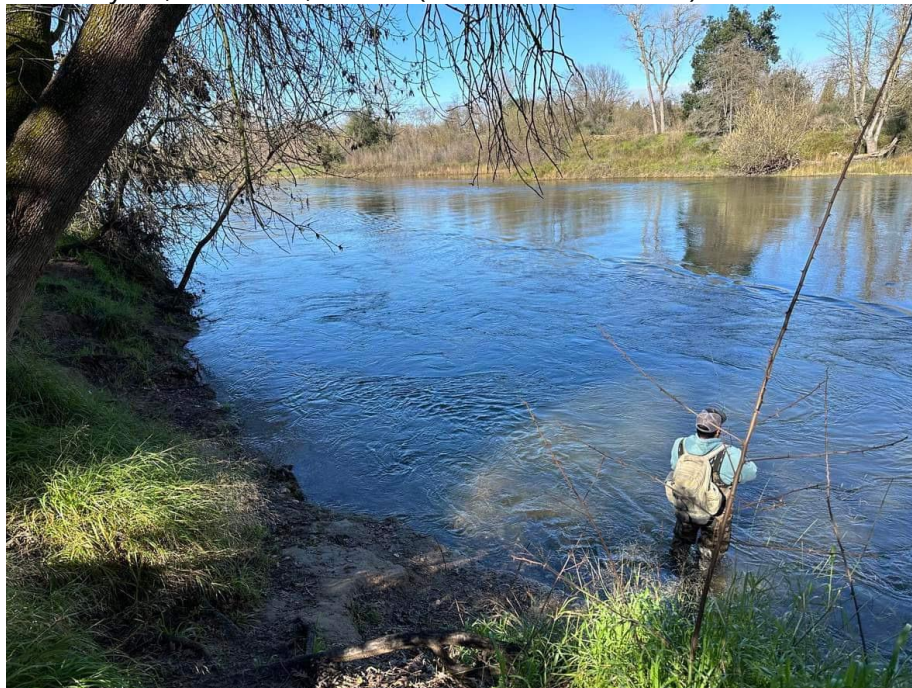
Note that there is also mention of any repair needing to take the intense recreational use at this location into account which it is not apparent that the Draft SEIR has done. This is also inconsistent with the American River Parkway Plan which requires erosion protection measures be designed to minimize vegetation loss and to not destroy the recreational uses of the river as required by its designation under the Wild and Scenic River Acts. It is also likely inconsistent with NEPA and CEQA.

7

8

The following are pictures of the river at River Mile 10.5 South at the same location at several different flow rates. The first is today, February 18, 2024 at a flow of 7,500 cfs. The second is from December 16, 2016 at a flow rate of 34,000 cfs. The third is from February 10, 2017 at a flow rate of 82,000 cfs. In each case there is no indication that erosion is occurring:

February 18, 2024 at 7,500 cfs (note the fisherman!)



December 16, 2016 at 34,000 cfs



February 10, 2017 at 82,000 cfs

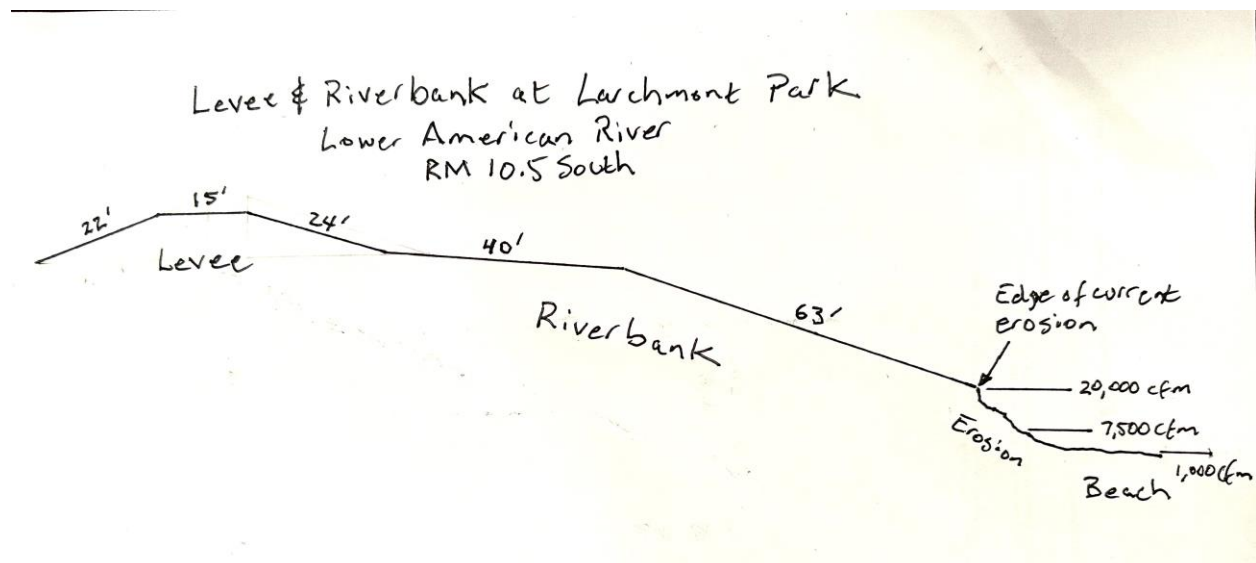


9
cont'd

Here is the same location at a more normal flow rate of 1,800 cfs



I have also taken detailed measurements of the levee and riverbank at River Mile 10.5 to show how far it is from where the erosion is occurring to where the base of the levee is located. The following drawing shows the location of where the waterline is when the river is flowing at 20,000 cfs which is when the water is moving the fastest and causing the most erosion. The drawing is to scale:



Note that the current erosion edge is nowhere near the base of the levee and can and will never be a threat to the levee so long as the riverbank soil, trees, and vegetation are left undisturbed.

I ask that, at a minimum, the erosion work at River Mile 10.4-10.5 south under Contract 3B be suspended indefinitely pending re-assessment of the threat (including soil sampling that

was never completed), and if necessary, a different erosion work strategy that does not involve the removal of trees or placement of riprap at the beach that would destroy the heavy recreational use at this location. I also ask that if Army Corps is unwilling to suspend the work at this location, that the Central Valley Flood Protection Board, as the lead agency under CEQA, demand that the work be suspended to develop a plan where trees and vegetation are not removed, the natural soil is not disturbed making it more susceptible to erosion, and that the recreational uses of the beach at this location are not destroyed.

Thank you,

William Brattain, P.E.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:28 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: Jeff E <jeffrey.g.ewing@gmail.com>
Sent: Sunday, February 18, 2024 2:22 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

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

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

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted

and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

Thank you.

Jeffrey Ewing

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:26 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: Maret Marcin <maretmarcin@gmail.com>
Sent: Sunday, February 18, 2024 2:18 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

Thank you.

[NAME]

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:26 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Parkway

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

From: Vince Di Fiore <vincentrobertd@gmail.com>
Sent: Sunday, February 18, 2024 2:01 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Parkway

1 Please find another way for levee improvements other than clear-cutting along the river.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:25 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Ursula Kastell <ursulakastell@yahoo.com>
Sent: Sunday, February 18, 2024 1:36 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

I bought my house 55 years ago because this is the only greenbelt around here. I love to walk along the river, admire the wildlife and I can't imagine to look at bare landscape. The levee was updated some years ago with a slurry wall and a 3' higher levee. It was hailed at a 200 year flood protection. We had to suffer through this operation, our park was partially a construction zone. In all those 55 years there was never a fear that the levee would fail, especially after the slurry wall was constructed.

It looks to me you have too much money on hand and have to find a way to use it.

It would be better spend on fixing our streets which are in a terrible state.

I hope you reconsider this "fix", it is unnecessary and only destroys the little bit of nature left around Sacramento, the "city of trees". It is supposed to be a parkway for all of us to enjoy.

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

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion”

protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes

this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

I have enjoyed this part of the parkway since 1992. It is part of my family’s history. The habitat is unique and should not be destroyed. Interestingly, my insurance company deemed that I did not need flood insurance as I was not in a 100 year flood plain, even though I live on the levee. I would like to see more data supporting the need for such a drastic renovation.

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:24 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Projects

From: Laurie Resnikoff <lauriewah@gmail.com>
Sent: Sunday, February 18, 2024 1:33 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Projects

RE: American River projects of the draft SEIS/SEIR, particularly contracts 3B, 4A, and 4B

- 1 Clear cutting will leave a barren wasteland detrimental to the environment, wildlife habitat, erosion, of one of Sacramento's greatest assets. It will take a hundred years, or more, for the recovery of mature trees and diverse species.
- 2 It will also reduce property values since the beautiful parkway is a big attraction to families, cyclists, fishermen, artists, and all humans who need spaces in nature to relax, unwind, and recharge,
- 3 I've lived next to the levee for over 40 years, through a lot of work on the levee, the bike trail, the ramp for access, etc, so I know our neighborhoods will be inundated with rats, rattlesnakes, coyotes and rabbits. The deer, birds etc. will probably just die with the loss of trees.
- 4 Some work may be necessary, but I don't believe the time to look into less destructive and more targeted alternatives has been taken. The fastest and cheapest option that has been selected with no input from the citizens will be devastating and is unnecessary, reckless, and possibly ineffective.

Laurie Resnikoff

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:23 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Nathan Davis <ndavis@scainc.net>
Sent: Sunday, February 18, 2024 12:10 PM
To: PublicCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: Melissa Davis <melissadavis07@yahoo.com>; RichDesmond@saccounty.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

To whom it may concern:

A I am writing to express my deep concern regarding the potential destruction of trees along the American River Parkway, particularly in relation to item 3b of your plan. As a resident living next to the levee, I can understand and appreciate the need to maintain and even strengthen the levee system, but I am also an advocate for the preservation of our natural environment. I am alarmed by the potential consequences this action could have on the local ecosystem and community.

The American River Parkway is an invaluable resource, providing recreational opportunities, habitat for wildlife, and a refuge for people seeking solace in nature. Any proposal that involves the removal of trees must be approached with extreme caution and consideration for the long-term health and sustainability of the parkway.

B While I understand that there may be legitimate reasons for certain developments or projects, it is crucial that all alternatives are more thoroughly explored, and the environmental impact carefully reassessed. The destruction of trees can have far-reaching consequences, including soil erosion, loss of biodiversity, and disruption of natural habitats.

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.

Furthermore, I urge the US Army Corps of Engineers to continue engage with the community and stakeholders in a transparent and collaborative manner throughout the decision-making process. It is essential that the concerns and perspectives of those who value the American River Parkway are taken into account and respected.

C | I implore the US Army Corps of Engineers to reconsider its plans that would result in the destruction of trees along the American River Parkway. Instead, I urge you to prioritize conservation and stewardship of this precious natural resource for the benefit of present and future generations.

Thank you for considering my concerns. I trust that you will act responsibly and with the best interests of the environment and the community in mind.

Sincerely,
Nathan Davis

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 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

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

From: Heather Frye <hifrye100@gmail.com>
Sent: Saturday, February 17, 2024 3:38 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My name is Heather. I live on Stansberry Way and teach at O.W. Erlewine Elementary also located on Stansberry Way next to Larchmont Community Park. I utilize the park at least 5 times per week.

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other

reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

Thank you.

Heather Frye

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:22 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Paul Kamper <paul.kamper@att.net>
Sent: Saturday, February 17, 2024 5:37 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River 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. I strongly question whether this “potential bank erosion” work is necessary along this section of the American River. The river flows very, very slowly in this section. The slop is only a few inches per mile.

A I have been walking, kayaking and hiking a lot in this section and I love the trees, the environment, the wildlife (otters, turtles, snakes and many, many birds) and it is very much intact.

Several times a year I try to pay the river back all the beauty, fresh air, good times and health it has provided me and I participate in the river clean-up.

It will be a pity if this section will be flattened and hundreds of trees, bushes and other plants will be sacrificed to this project. At the same time the wildlife will be kicked out as well.

I am living in the bay area, but I have bought a house nearby because I am so excited about this section of the American river, and I planned to retire there soon.

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.

Paul Kamper

Intro

These comments only address the Contract 3B South Site 4-1 from Watt Avenue to the upstream end of the project near Mayhew Drain, although the same comments would be applicable to the North Site 4-2. Before beginning my comments I should state that I worked 30 years at the Corps of Engineers, Sacramento District, most of that time in the Hydraulic Design Section. I worked on many dam and channel control projects. On the American River I was part of the design team establishing the top of levee for raising of the levee upstream of Mayhew Drain on the left (south) bank; I did the conceptual design and reviewed the final design for the Mayhew Drain structure; and I was on the design team for the Folsom Dam Auxiliary Spillway and developed the conceptual design for the stepped spillway chute which significantly reduced energy dissipation required in the downstream stilling basin.

1

To begin with I have two minor comments. The first is that the Hydraulic Appendix only provides information on Magpie Creek with no information on the hydraulics associated with

2

Contract 3B. The second is the term SWIF on Figure 3.5.3-2. I could not find the definition even in the list of definitions.

3

The proposed work upstream of the Manlove Pump Station, approximately River Mile (RM) 9.7, would significantly impact the existing riparian vegetation. The riparian vegetation has survived nearly 60 years of controlled releases from Folsom Dam including two major floods of 134,000 cfs in 1986 and 110,000 cfs in 1997. The present riparian vegetation upstream of RM 9.7 ranges from about 130 to 140 feet in width from the toe of levee at a channel flow of 3,640 cfs. The riparian vegetation serves to reduce flow velocities in the overbank which helps to protect levee integrity. The design flow for the project is 160,000 cfs. Below is a tabulation from HECRAS of velocities in the left overbank, main channel, and right overbank for the two major floods and the design flood, including the computed water surface elevation, CWSEL, at several locations in the reach.

RM	Q	V _L	V _c	V _R	CWSEL
10.5	110000	1.61	3.60	1.28	49.38
	134000	1.67	3.95	1.51	51.98
	160000	1.81	4.29	1.73	54.81
10.25	110000	2.29	4.89	2.29	48.66
	134000	2.57	5.32	2.55	51.48
	160000	2.83	5.73	2.80	54.27
10.0	110000	2.70	8.65	1.35	47.17
	134000	2.72	9.54	1.83	49.76
	160000	3.22	10.32	2.26	52.37
9.75	110000	0.70	7.81	2.07	46.68
	134000	2.80	8.53	2.36	49.26
	160000	1.67	8.94	2.70	51.86
9.25	110000	2.97	7.40	2.00	46.64
	134000	3.40	8.20	2.32	48.11
	160000	3.81	8.96	2.63	50.61

4 The purpose of the above tabulation is to show that the historic floods are subjecting the riparian vegetation to approximately the same velocities and depths of flow as the design flow for the reach. This means the riparian vegetation has been subjected to similar erosive forces as would occur under the design condition. Since the historic floods have not caused erosion to the extent that levee integrity was compromised, it is likely that the design release during one flood event would also not threaten levee integrity. This would then allow an evaluation of the condition of the riparian vegetation after the first design flood event, and then a determination as to whether or not work was necessary to protect the levee integrity.

5 Another important consideration is duration of the peak flows. The longer the duration the more chance that erosion will occur. For the 160,000 cfs design release the flow would have a duration of about 31 hours for a 120 year flood event increasing to about 40 hours at a 200 year flood event. The 1986 flood event had a duration above 130,000 cfs for about 22 hours and the 1997 had a duration above 100,000 cfs for about 30 hours. This means that the effect of flow duration for the historical flood flows on the riparian vegetation is relatively comparable with the design flow durations, particularly if considering that the historical flows had a combined duration of about 52 hours. This further indicates that the first occurrence of the design flood event should not affect levee integrity due to erosion. It is noted that if 160,000 cfs continued above 40 hours it indicates a flood larger than a 1 in 200 year event is occurring and releases would rapidly ramp up to protect Folsom Dam from overtopping. This would cause overtopping of the downstream levees regardless of the amount of riparian erosion occurring.

It is noted that the American River Flood Control District, ARFCD, has done repair work on bank erosion near RM 10.5 and RM 9.8.

6 From approximately RM 9.8 the width of the riparian vegetation (from approximate measurements taken personally) gradually narrows to Watt Avenue as shown in the following table.

RM	Width from Toe of Levee	Approx Location
9.81	130 feet	8 houses u/s of Waterton Access
9.7	90 feet	Waterton Access
9.55	85 feet	400 ft d/s of Gated Structure on Levee
9.41	57 feet	100 ft u/s of Watt Ave parking lot

Depending on the soil conditions for the reach downstream of RM 9.7 it may be desirable to provide river bank protection to preserve the remaining riparian vegetation.

7 Until future floods indicate that erosion of riparian vegetation upstream of RM 9.7 impacts the integrity of the levee, I recommend that no work be done in this reach regarding river bank protection, launchable toe and trench protection, and tiebacks.

I make no particular recommendation for any riparian work downstream of RM 9.7.

8 It is paramount that the integrity of the levee be maintained. To accomplish this, I recommend that the entire levee upstream of Watt Avenue to the end of the project near RM 10.53 be provided with levee toe protection and slope protection extending a minimum of 1/3 of the levee

8
cont'd

slope length above the toe protection. The toe protection should be designed in accordance with Method B of Plate 37 in EM 1110-2-1601 and be buried so as to restore the existing pedestrian path. However, if the Method B width encroaches into the riparian vegetation, I recommend that Method A be used. Method B is similar to the toe trench shown on Plate 3.5.2-2 of the SEIS. Method A simply extends the levee slope protection below ground, although the layer thickness and/or rock size could be increased to reflect higher velocities at the toe than would occur along the levee slope. Both methods could be used in the project reach depending on the distance of the riparian vegetation from the toe of the levee. If the toe and slope protection is taken as sufficient to provide for levee integrity, there may be no need for riparian work downstream of RM 9.7.

Charles S. Mifkovic
Hydraulic Engineer, Retired
USACE

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:20 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: Jay Lowy <jlowy93@gmail.com>
Sent: Saturday, February 17, 2024 3:34 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.

A I have lived along the American River Parkway since 1993 and have been a frequent user of the parkway since 1987 for running, fishing, kayaking, cycling, hiking, photography, and wildlife viewing.

I have long been aware of the various projects at Folsom Dam and the Lower American River levees over all of those years.

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 Army Corps of Engineers even has supported and performed various flood protection projects utilizing their own "Engineering with Nature" concepts and protocols.

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.

Jay and Susanna Lowy

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:19 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Oppose American River Parkway Project

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

From: Callie Hurd <califmtngirl@yahoo.com>
Sent: Saturday, February 17, 2024 6:34 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Oppose American River Parkway Project

I oppose the American River Flood Control project. At first I tried to have confidence in what you guys are doing, but if you continue the horrific destruction of hundreds of years of river frontage you will be destroying Sacramento's greatest natural resource. The American River section near Estates has been my stomping grounds since 1982. I have seen deer, coyote, bobcat, river otter, beaver, sea lions, bald eagles, great horned owls, swans, geese, ducks, and on and on. I have taken every visitor I've ever had to the river. One exclaimed "whoa, it's National Geographic down here!" It is my greatest close-to-home haven. What you have done to the lower section of the American River is nothing short of a complete catastrophe. Keep your stupid ideas off my section of river.

Catherine Hurd
Sacramento, CA 95864

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:17 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: Janice Chung <jansongwalk@comcast.net>
Sent: Sunday, February 18, 2024 12:16 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

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

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

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

A

I have lived in unincorporated Sacramento since 1973. My family has been members over the years (decades) of the Junior Museum-Sacramento Science Center, Effie Yeaw Nature Center & American River Parkway Foundation, SARA, etc. and enjoy walking the trails on the American River from Discovery Park to Folsom Lake. My neighbors and I walk along Arcade Creek and on the American River College campus.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible

alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

I did attend the Webex presentation on Jan. 10, 2024 and listened to the 3 hours of comments while reading the chat.

My specific concerns and comments include the following: from a google search on revetment and rip rap: “Why is rip rap bad? Because rip-rap reduces cover, increases temperature and eliminates access to spawning areas, it can have a negative impact on habitat. [Engineering With Nature Alternative Techniques to Riprap Bank ... – FEMA](#)” And

[Negative Impacts of Riprap on Lakeshores – Flexamat](#)

As for long-term cost benefits, it's important to keep in mind that rock riprap, though considered a “non-vegetative” solution, will eventually vegetate, often with weeds and other undesirable plants growing up through voids in the rock bed.

[Cost Benefits of Using TRM-Reinforced Vegetation vs ...](#)

I applaud the US Army Corp of Engineers for taking on the problem of flooding and looking for remedies especially with climate change. But has any consideration been taken that this is not the Ohio or Minnesota, but the lower American River “the only Wild & Scenic river in the U.S. to pass through a major metropolitan area” and the “crown jewel of Sacramento”?

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

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

Thank you.

Ms. Janice Chung

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 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

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

From: Hannah Esteves <hannahestevess22@yahoo.com>
Sent: Saturday, February 17, 2024 4:06 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):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

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

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

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code §

21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

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

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

Thank you.

[NAME]

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:14 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Subject: Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

From: Michele Tracy <mtracy@mulfil.com>
Sent: Sunday, February 18, 2024 8:18 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Subject: Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

Dear US Army Corps of Engineers and Dept. of Water Resources Comment Recipients:

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

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

I have suffered from depression and anxiety most of my life and the American River Parkway has been a refugee for me. Walking in nature has often soothed my troubled mind and I am grateful for all the trees, wildlife, and wonder I have seen over the years. T

Turning this beautiful place into a concrete jungle deeply saddens me. I understand about the 100-year flood plain, but there is no reason to tear out all of the beautiful trees. I know more conservative approaches have been taken in other flood prone areas around the country. I think we can do a better job of saving the beauty in our community.

Given the opportunity, people would help defray some of the costs to do this project in an eco-friendlier way.

Please consider my request and comments.

Very truly yours,
Michele Tracy
2414 Walnut Oaks Lane
Carmichael, CA 95608
926-803-5217



Michele Tracy

Director of Administration

O 916.492.8020 D 916.999.8073 F 916.629.0133

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:09 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Sherie Brubaker <sherie_brubaker@sbcglobal.net>
Sent: Saturday, February 17, 2024 10:08 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

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

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 near the river almost every day. This walk in nature has a calming effect. I'm a caregiver for a spouse in the early dementia stage.

A I have lived near the American river for almost 40 years. I moved here to be near the river for the hiking and biking trails, the lush riparian environment AND the wildlife.

The proposed project will destroy all of that. I'm almost 69 years old. I'll never see another lush riparian environment again in this area in my lifetime if this project goes forward as planned. We already lost almost all vegetation along the river from Campus Commons to the west past Paradise Beach :-(.

- The levees were strengthened awhile ago

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 clear cut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

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.

Sherie Brubaker, 2821 Roxanne Ct. Sacramento ca 95826 916-217-6557

I hope you and your loved ones are healthy and happy.

Thank you

Sherie

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:05 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: pmkunstler@gmail.com <pmkunstler@gmail.com>
Sent: Saturday, February 17, 2024 3:26 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

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

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

A The American River Parkway is extremely valuable to me. We recently moved to Sacramento, and chose the area where we would live based largely on its proximity to American River access; as did our three children, who have also relocated to Sacramento. We have already spent many hours in the last few months near the banks of the river, enjoying the general lack of development and general focus on preservation. The proposed project will, on the other

hand, destroy a significant portion of what makes the American River so precious not just to us but to all of this city, and to the State of California.

I strongly question whether this “potential bank erosion” work is necessary at all along this section of the American River, and am deeply concerned that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely, or even more likely, to put us at risk in high water flows as no work at all. The existing trees protect against erosion, while the proposal would lay bare the banks for greater erosion. New trees will give way to erosion long before they can stop it.

Therefore 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.

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 fewer environmental impacts) are not presented.

I have been informed that the destruction of the trees is mostly for the purpose of bringing in the heavy equipment allegedly needed to carry out the project. That is like saying that you have to destroy the riverbank in order to save it! At the same time, this approach proves that the existing trees are actually doing their job. If any erosion work is truly and absolutely necessary, then (1) tailor it to meet needs at much more specific areas along the river; (2) use equipment that will require the very least destruction of existing foliage and trees, and (3) bring that equipment in by the least disruptive means necessary.

I have also been informed that the use of heavier equipment is required to keep down the cost of the project. That is an utterly near-sighted view. The long-term cost of the proposed destruction will vastly outweigh that of making the entire project—if it is needed at all—less invasive and destructive. You don't need an 18-wheeler to tow a rowboat.

I have heard that the American River Parkway is called the "Crown Jewel of Sacramento". These proposed decisions will affect this irreplaceable treasure for generations to come, and plans for the project should therefore reflect the care that this treasure deserves.

Sincerely, and in the hope that reason will prevail over brute force,

Peter M. Kunstler

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:56 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Barbara Ross <barb.enjoy@gmail.com>
Sent: Saturday, February 17, 2024 12:26 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

A | The American River Parkway is extremely valuable to me. I grew up running and biking along the parkway and am looking forward to doing the same with my young kids.

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 extensive damage to the natural landscape and trees

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.

Barbara Ross

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:56 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments on American River Common Common Features Draft EIS and Subsequent EIR December 2023 Report

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

From: James M Pappas <papfam@pacbell.net>
Sent: Saturday, February 17, 2024 11:49 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments on American River Common Common Features Draft EIS and Subsequent EIR December 2023 Report

I live on Estates Drive which provides vehicle access to the American River Parkway. I am concerned with:

1. Potential health impacts from vehicle traffic associated with this project especially from diesel emissions and dust.
2. Damage to my home from vibrations of heavy trucks and equipment traveling along our residential street to get onto the Parkway.
3. Damage to the street from heavy vehicles and traffic. Previously the Corp and its contractors used our street for years to access the Parkway for the levee fortification project. Our street was severely damaged (significant cracks). It needs to be fixed. They did not repair the street. Additional heavy truck traffic may totally destroy our street.

Please address my concerns.

James M. Pappas

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:55 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] SEIS/SEIR 3B 4A 4B

From: Danielle Best <danielleabest@gmail.com>
Sent: Saturday, February 17, 2024 10:49 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] SEIS/SEIR 3B 4A 4B

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. As a nature-lover it is a wonderful place to experience the changing seasons. Daily walks there are a huge part of maintaining my emotional wellness.

I strongly question whether this "potential bank erosion" work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

B Please spare the old deeply rooted trees. We have seen the erosion from your previous work. Trying to plant new trees in shifting dirt will not take. It’s compounding a problem that you’ve been tasked to prevent.

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.

Danielle Best

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:54 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Phyllis Ehlert <pehlert00@gmail.com>
Sent: Saturday, February 17, 2024 10:32 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

1 I am appalled at the proposed stripping of the banks of our local rivers around Sacramento. Theories of which treatment is best and change through the years. But once the trees are gone, there is no return. Other areas like in the southeast have found that stripping is not good, that in place vegetation acts as a sponge and holds the earth in place. Please do more research into alternative plans.

Phyllis Ehlert
Sacramento

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:52 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Army Corps Common Features project comments

From: Dan Kopp <pumakopp72@gmail.com>
Sent: Friday, February 16, 2024 8:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Army Corps Common Features project comments

Folks,

I want to comment in a manner that I am almost certain no one else will.

1 | And it has to do with the boiler plate mentality of large governmental projects and their dismissive treatment of the magnitude of such a project with a copy and paste approach.

I am talking about, of course, the inclusion of Purple Martin, which begins at the extreme bottom of page 4.3 - 41 and continues on the following page, into the analysis of this project.

2 | Anyone who knows anything about the project area above and beyond someone from a detached central command position that mindlessly churns out these documents without knowing the area first hand while using the most amount of copy and pasting possible, would know about the extensive research on Sacramento's Purple Martin population and how including them into the Special Status Species account for this particular project blatantly demonstrates a dismissive one-size-fits-all approach/mentality that doesn't require their complete attention.

It's like you folks came up with a Nationwide Permits version of a SEIS and call it good, without checking every detail. That's how Van Halen would have gotten you to cancel this project, as it would be in Article 126 along with the no brown M & Ms clause: ***the inclusion of ridiculous species for special analysis on any project, such as American Badger and Purple Martin et al in this case, that have no business being included is an automatic stoppage of the project and the forfeiture of your role as Lead NEPA Agency.***

3 | So there you have it, short and sweet. If you folks can't get all of the details absolutely correct on paper, how in the world are we supposed to believe in the need for this project and its promised continuation of widespread destruction along a scenic river (that's right, not *wild* and scenic as some folks are claiming; I'm sure you folks will bring up *that* important detail as it makes the destruction less wild I guess)?

4 Oh, and I'd love for someone to come show me a Crotch's Bumble Bee along the Parkway between Howe Ave. and the Mayhew Drain; never heard of it, which would be easy for me not have heard of, but it further speaks to the level of centralized we-don't-live-there care these Army Corps projects leave behind.

5 And to top it all off, you folks make sure to start these projects at the height of breeding bird season in Sacramento; so May might be your boilerplate month for a project to start in Alaska or Vermont, but folks, let me tell you, May is the absolute most destructive and stupidest month to remove large swaths of vegetation along a riparian environment in Sacramento. That's where this project is guys, not Michigan.

6 Please reconsider your document compilation strategy for this and all of your projects going forward. Things this important and destructive demand an agency's full non cut and paste-style of professionalism. I worked on the 2.2 and 2.3 projects and there were several folks who went back to their homes in Chicago and other eastern U.S. cities after completion who will likely never see that project area in person again; and for the short term who would blame them? It looks horrible.

I'll let everyone else have at you folks with the boilerplate stuff offered-up on the American River Trees website. So get ready for a lot of folks coming at you with their mental health concerns etc.

Sincerely lacking any confidence in this project,

Terrence Daniel Kopp

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:50 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] American River Common Features public comment

From: Ronnie Jeanne Amato <myriadie@icloud.com>
Sent: Friday, February 16, 2024 7:10 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Common Features public comment

1 | I encourage action on the American River but also at my property, 5636 Kenneth Ave., Fair Oaks, 95628. The Lower Arcade Creek runs through my property and building has taken place around me that was previously flood plane. They elevated it and built tall walls. It is eating away my property. Eventually swallowing my fence and house. It was tiny year-round creek before the housing. Someone said I should get an attorney, but I hate to sue the county. It hurts everyone. This has caused erosion to my part of the creek and I do not have the funding to repair it, nor should I have to. The County Planning allowed it.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:46 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Zilan Chen <zilan.chen8@gmail.com>
Sent: Friday, February 16, 2024 6:10 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me. I live near the river and I visit the parkway daily.

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

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

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

Thank you.

Zilan Chen

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:44 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: Jacqueline DeLu <jtdelu46@gmail.com>
Sent: Saturday, February 17, 2024 9:48 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

1 The American River Parkway is extremely valuable to me.

My family has lived by the American River for 23 years enjoying the wildlife and plants. We are especially interested in birds along and in the river. Watching the seasonal changes brings calm and joy into our increasingly divisive world. We have witnessed many flood events and always are happy to see our banks relatively unscathed upon the water retreat.

2 | Where will the wildlife go following the felling and digging up of their habitats? Where will the birds go for food and shelter?

3 | As you progress through this plan, it appears that for several years the denuded banks will be subject to erosion more than we have seen in the past. Note what has happened in recent rains at the H Street bank work completed recently!!! Massive erosion that will compromise the salmonids downstream!

4 | Your reason for this plan of denuding and laying riprap, has not been shown to us. The maps you provide do not show any detail on the actual velocity readings in the locations you propose to raze.

5 | 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.

6 | I would like the USACE to consider their publication of natural methods to control erosion: Engineering With Nature by Dr. Todd Bridges. Your 2016 plan for our American River (Wild and Scenic River designation) is outdated and poorly adapted to our particular river banks and their wildlife.

I hope to see a new plan that addresses the unique aspects of our Sacramento Crown Jewel!

Jacqueline DeLu

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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

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

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

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

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

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

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

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

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

would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

Please consider my comments and those of the many other Sacramento Area residents who strongly oppose this project!

Thank you,

Sandra Julee Starkey

E. Sacramento, CA

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 7:43 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Tree removal

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

From: Ron Farquhar <rbfarquhar@icloud.com>
Sent: Monday, February 19, 2024 8:19 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Tree removal

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

1 Please don't cut our trees down. They help stabilize the soil and look so much better than rocks.

Sent from my iPhone

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 7:53 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River Parkway Project 3B

From: Steven Whitehead <smksgnl8@icloud.com>
Sent: Monday, February 19, 2024 10:26 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Fwd: American River Parkway Project 3B

You don't often get email from smksgnl8@icloud.com. [Learn why this is important](#)

Read on.

Sent from my iPhone

Begin forwarded message:

From: Steven Whitehead <smksgnl8@icloud.com>
Date: February 19, 2024 at 10:07:32 AM PST
To: ARCF_SEIS@usace.army.mil
Subject: American River Parkway Project 3B

As a resident of Sacramento for 40 years one may understand my alarm when I discovered plans for project 3B. I will make it clear I do not view the project thru the lens of equations or data tables. What I can offer is some insight I have gathered as an outdoors enthusiast who regularly visits the parkway.

Firmly - I do not believe removing 500 trees and adding 'Launchable rock toes' east of Howe avenue is necessary.

A 'Prolonged period of high water' is your concern. If that's the case then why have I not seen examples of erosion during my last 40 plus years of running, hiking, and biking the Parkway? Yes I will admit to seeing a bank collapse at Campus Commons Golf Course but was minimal. Which brings me to my point.

The American River rarely flows at a high volume of water and when it does it is usually for a brief period no more than a week or so.

Additionally efforts made at Folsom Dam releasing water ahead of a period of wet weather usually alleviates the problem of unnecessary concern to erosion. The winter of 2022-23 should be used as a template as to how to manage water flows.

With all that being said. The riparian habitat east of Howe Ave is part of what makes Sacramento a beautiful city to live in.

I believe your efforts to control erosion should be handled in a more sensitive way working with nature and with the community in order to achieve an outcome which benefits everyone.

Yours, Steve Whitehead

Sent from my iPhone

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 8:00 AM
To: Sutton, Drew
Subject: [EXT] FW: Access to complete Draft SEIS/SEIR
Attachments: Screenshot 2024-02-18 191134 from Public Presentation, slide 11.jpg; ARCF_DrafSEIS_LARC4B supplied by USACE 2.16.24 (2).pdf; LAR C3B trees upstream supplied by USACE 2.16.24.pdf; ARCF_DrafSEIS_LARC4B supplied by USACE 2.16.24.pdf

From: Brenda Gustin <bkgustin@gmail.com>
Sent: Monday, February 19, 2024 8:56 AM
To: ARCF_SEIS@usace.army.mil
Cc: Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>; DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>; Baines, Kathryn@CVFPB <Kathryn.Baines@CVFlood.ca.gov>; Woertink, Amber@CVFPB <Amber.Woertink@CVFlood.ca.gov>; Dolan, Jane@CVFPB <Jane.Dolan@cvflood.ca.gov>; Supervisor Rich Desmond <richdesmond@saccounty.gov>; Pat Hume <pathume@saccounty.gov>
Subject: Access to complete Draft SEIS/SEIR

You don't often get email from bkgustin@gmail.com. [Learn why this is important](#)

To Whom it May Concern,

1 As a Native Sacramentan, I am doing my best to understand the logic and the appropriate data supporting the American River Common Features Project Contract 3B for the Lower American River. The area proposed to be denuded to protect us from erosion caused by future high waters serves a variety of purposes for citizens, wildlife and supporting habitat. I recognize that measures must be taken to protect our area from increasing rains and melting snow, however the health and wellness of citizens, wildlife and our habitat will be negatively affected by this project.

2 I have yet to locate adequate data in your Draft SEIS/SEIR
supporting this erosion control nor has the public received answers
to the plethora of questions posed at the two public meetings in
January 2024 nor from correspondence and phone calls to receive
3 answers to our questions. In fact, I continue to locate data negating
this to be the proper way to proceed and am learning that USACE
has created partnerships with local residents, agencies and
4 organizations to reduce the destruction of nature. The USACE
presentation at the Central Valley Flood Protection Board
Workshop held on February 9, 2024 specifically stated that
USACE will "make nature a structural component of projects", and
I've seen evidence in other areas where USACE has worked with
local groups and agencies to utilize the variety of benefits the
natural environment provides through your program, Engineering
with Nature. I do not see any evidence that this program is being
5 implemented here relative to the proposed changes to our Federal
and State Designated Wild and Scenic American River. The
multitude of recreational uses it now supplies to residents are
critical to health and wellness as much or even more than these
protection measures being planned.

6 When our time for public comment is nearing its close this week on
Friday, February 23, 2024, I cannot access admittedly omitted data
brought forth after it was found to be missing by a member of the
public.

7 While I appreciate the positive response on your website to "A
public commenter" bringing to your attention that several sections
were omitted in the Draft SEIS/SEIR, (see below) it is
unreasonable for our review of just under 2,000 pages in such a
short time frame especially when aspects of the plan seem illogical
based on a plethora of data we have accumulated. I sincerely
appreciate that you extended our comment period from February 5,
2024 to February 23, 2024. However, this is still not providing

enough time and in fact, with lost time to review omitted documents, we are losing

8 Therefore, I respectfully request the public comment period be extended another 45 days or more to provide time to review. I further request that you answer the many questions posed to you in your January presentations. Attached are screen shots of what occurred when I tried to view these documents both yesterday and today. :

9 [Figure 3.5.2-11, 3.5.2-12](#)

[LAR C3B trees upstream 20240216](#)

[LAR C3B trees downstream 20240216](#)

My pop up blocker is disabled and another colleague of mine is having the same issue. I was finally able to receive a copy of these documents from another colleague (see attached) and upon my review this morning, these are inadequate for me and others to discern exactly what USACE is planning to remove and keep.

10 Earlier maps indicated more details when you were at the 65% - 95% stage. What happened to that kind of detail? It is imperative that the public be brought into this equation. We are the ones you are working for and if your plan is accurate and absolutely required for our protection, explanations should be clear and communicated concisely.

11 Please advise whether you can extend the public comment period for another 45 days. Thank you very much for your kind consideration.

Sincerely,
Brenda Gustin
Native Sacramentan/Concerned Citizen

From your
website: <https://www.spk.usace.army.mil/Missions/Civil-Works/Sacramento-Levee-Upgrades/>

Note: A public commenter brought to our attention that Section 3.5.2 *American River Erosion Contracts 3B North, 3B South, and 4B*, in the Draft SEIS/SEIR omitted Figures 3.5.2-11 and 3.5.2-12 (page 3-42). These diagrams have been available to the public in the Presentation Slides under Public Engagements on Slide Number 11. You may also view the link below. These Figures will be added to the Final SEIS/SEIR.

[Figure 3.5.2-11, 3.5.2-12](#)

[LAR C3B trees upstream 20240216](#)

[LAR C3B trees downstream 20240216](#)

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 8:05 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River Project

From: Laurie Resnikoff <lauriewah@gmail.com>
Sent: Sunday, February 18, 2024 2:01 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River Project

You don't often get email from lauriewah@gmail.com. [Learn why this is important](#)

RE: American River projects of the draft SEIS/SEIR, particularly contract 3B, 4A, and 4B.

- 1 | There has not been adequate analysis of the environmental impact of this project, consideration of other methods, or public input.
- 2 | Clear cutting will leave a barren wasteland that will destroy the environment of one of Sacramento's greatest assets. It will take a hundred years for the replacement of the mature trees and the return of the diverse wildlife.
- 3 | The project as it is designed now will also destroy property values, since the beautiful parkway is a big attraction to families, cyclists, fishermen, artists, and all humans who need spaces in nature to relax, unwind, and recharge. Our
- 4 | neighborhoods will be inundated with rats, rattlesnakes, coyotes, possibly even bobcats and mountain lions when their habitats are destroyed. The deer, birds, rabbits will probably just die.
- 5 | Some work may be needed, but I don't believe the time and effort has been taken to select the best methods, not just the fastest, easiest and cheapest method. There are less destructive and more discriminating alternatives..

Laurie Resnikoff

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 8:12 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Comments on American River Common Common Features Draft EIS and Subsequent EIR December 2023 Report

From: James M Pappas <papfam@pacbell.net>
Sent: Saturday, February 17, 2024 1:53 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Fw: Comments on American River Common Common Features Draft EIS and Subsequent EIR December 2023 Report

You don't often get email from papfam@pacbell.net. [Learn why this is important](#)

corrected contact phone number 9167615942

----- Forwarded Message -----

From: James M Pappas <papfam@pacbell.net>
To: PublicCommentARCF16@water.ca.gov <publiccommentarcf16@water.ca.gov>
Sent: Saturday, February 17, 2024 at 01:48:21 PM PST
Subject: Comments on American River Common Common Features Draft EIS and Subsequent EIR December 2023 Report

I live on Estates Drive which provides vehicle access to the American River Parkway. I am concerned with:

1. Potential health impacts from vehicle traffic associated with this project especially from diesel emissions and dust.
2. Damage to my home from vibrations of heavy trucks and equipment traveling along our residential street to get onto the Parkway.
3. Excessive noise and disruption from project related vehicles running up and down Estates Drive from the project site
4. Damage to the street from heavy vehicles and traffic. Previously the Corp and its contractors used our street for years to access the Parkway for the levee fortification project. Our street was severely damaged (significant cracks). It needs to be fixed. They did not repair the street. Additional heavy truck traffic may totally destroy our street.

Please address my concerns.

James M. Pappas

Sent from my iPhone

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 8:13 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Phyllis Ehlert <pehlert00@gmail.com>
Sent: Saturday, February 17, 2024 10:41 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

[You don't often get email from pehlert00@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

1 I am appalled at the proposed plan to basically strip the banks of our local rivers. Theories change over time but once our several hundred year old trees are gone, there is no going backward. Areas in the southeast have found that leaving vegetation in place acts as a sponge and holds earth in place. It is not simply a matter of aesthetics. Please study alternative solutions.

Phyllis Ehlert
Sacramento

From: Sutton, Drew
Sent: Tuesday, February 20, 2024 9:10 AM
To: Dorff, Becky
Subject: FW: [Non-DoD Source] Comments Re ARCF 2016 Draft Suppl Environ Impact Stmt/Subseq Environ Impact Rept (SEIS/SEIR) – 12/23 Rept & Appendices

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 9:00 AM
To: Sutton, Drew <dsutton@geiconsultants.com>; Bailey.Hunter@usace.army.mil
Subject: [EXT] RE: [Non-DoD Source] Comments Re ARCF 2016 Draft Suppl Environ Impact Stmt/Subseq Environ Impact Rept (SEIS/SEIR) – 12/23 Rept & Appendices

Yes, I saw this one. Our NOI mailing list has addresses without names, so I cannot verify on our end..

Josh

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:51 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] Comments Re ARCF 2016 Draft Suppl Environ Impact Stmt/Subseq Environ Impact Rept (SEIS/SEIR) – 12/23 Rept & Appendices

Hey Drew and Josh,

Here is a public comment. This is the second person on LAR C3B North that has said that they did not receive notification. I am going to follow up with Jay and Barb just to double check.

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

From: Nina Nazimowitz <nnazimowitz@gmail.com>
Sent: Monday, February 19, 2024 10:22 AM

To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>

Cc: PublicCommentARCF16@water.ca.gov; AmRivTrees@gmail.com

Subject: [Non-DoD Source] Comments Re ARCF 2016 Draft Suppl Environ Impact Stmt/Subseq Environ Impact Rept (SEIS/SEIR) – 12/23 Rept & Appendices

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

A My husband Jaben Brenoel and I, Nina Nazimowitz, have been residents 2643 Kadema Drive, Sacramento, CA 95864 for 1.5 years. Our house is adjacent the American River levee. We moved here to be closer to the beautiful American River and its parkway, the quiet peaceful neighborhood with lots of trees, and the proximity to the nature and recreation amenities of the parkway. I use the bike trail almost every day for walking, running and biking. We moved our family here from Tahoe where we knew we could enjoy the benefits of the city and also have an immersive natural experience due to the wildlife, open spaces and number of trees as Sacramento is known as the “City of Trees.”

B We learned from Peter Spaulding, www.americanrivertrees.org, and www.sarariverwatch.org about the lower American River projects of the draft SEIS/SEIR, particularly Contracts **3B (where we live)**, and 4A and 4B. We have INCREDIBLY serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. The American River Parkway and its trees and nature are extremely valuable to us! **We are TREMENDOUSLY angry that we have not received any information on plans, schedule, and consequences for our direct area until yesterday. Why haven’t we been notified of these Army Corps public meetings that apparently occurred January 10 and 16? We are totally against having the parkway close to our house become a vast desert of dirt like what was done along the river by California State University, Sacramento.**

Jaben and 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. We do **NOT** support the devastating methods being proposed to address potential bank erosion concerns. We do **NOT** see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including 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.

Our specific concerns and comments include the following:

C **1. EXTEND THE FORMAL COMMENT PERIOD OF THESE PROJECTS TO FALL 2024!!!**

2. ADEQUATELY NOTIFY ALL PARTIES, CONDUCT EXTENSIVE PUBLIC MEETINGS, GET SUFFICIENT APPROVALS BY ALL AFFECTED PARTIES IN OUR CITY AND BEYOND BEFORE MOVING FORWARD.

D **3. GET DR. TODD BRIDGES TO LEAD THESE PROJECTS USING HIS PRINCIPLES OF ENGINEERING WITH NATURE TO CREATE A SAFE LEVEE SYSTEM AS WELL AS AN ENVIRONMENTALLY ROBUST AND BEAUTIFUL LANDSCAPE THAT SACRAMENTO RESIDENTS LOVE AND CAN BE PROUD OF.**

4. PLEASE, PLEASE SAVE THE TREES AS MUCH AS YOU CAN!!! THEY MAKE THE PARKWAY AND OUR CITY A BEAUTIFUL AND HEALTHY PLACE TO LIVE!!!

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 (our home) 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 for your consideration of our concerns and of many others in our area who are equally concerned. It is better to do it the right way than to rush through this and have it become a disaster. Please take the extra time and effort to get this right and you will be happier you did it.

Sincerely,
Jaben Brenoel and Nina Nazimowitz
and their children who love Sacramento Zoe and Miles Brenoel

Nina Nazimowitz, M.A., LMFT CA #52457

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:45 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

From: Janel Hernandez <janelhernandez47@yahoo.com>
Sent: Monday, February 19, 2024 6:48 PM
To: AmRivTrees@gmail.com; ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

I am a proud native Sacramento resident. I was born here in Sacramento and have lived here all of my life. I am now nearing 70 years old.

Intro

I can remember before the American River "bike trail" was here. I've raised two children and 5 grandchildren and taught them all that the trees here in Sacramento are sacred and cherished. My parents were native to this town also and they raised me to love the city of trees.

1 I have a terrible feeling that the idea of clearing many of these trees from the levees before considering a more adequate study of the environmental impacts, would be destructive and devastating.

2 The American River Parkway is considered our Crown Jewel of Sacramento. Please consider more alternatives and spare these beautiful trees for now and for the future of our environment.

Thank you
Janel Hernandez

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:43 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Karen Kunstler <karenkunstler@gmail.com>
Sent: Monday, February 19, 2024 6:35 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

The American River Parkway is extremely valuable to me.

A | My daughter and family moved to the Sacramento area 5 years ago. I loved visiting them, especially our many walks by the river, enjoying various access points. Then my son and his young family moved here a

year ago. When my husband and I retired last year we moved from LA and bought a house in Arden Park to be close to the American River Parkway. We also helped our third child move from LA and buy a house on La Riviera Drive, within walking distance of river access so that he can enjoy walking his dog daily on the path through the trees by the river. We all regularly meet and delight in these walks, so close to the city, especially the 200 year old oak trees, the wildlife and birds. We were devastated to learn that these ancient trees and vegetation are planned to be bulldozed.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

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

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

2. Rip Rapped streambanks present significant negative consequences:

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

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

- Experts disagree about the erosion risk along this stretch of the river. More empirical data was recommended, but generally concluded

that erosion resistant material was present and significant scour below it was not anticipated. Seepage data show no issue for seepage, especially after the deep slurry walls were added inside the levees.

- 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, 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 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 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 environmental justice issue has not been adequately addressed in the environmental analysis.

I strongly request:

Bring in smaller equipment so as not to damage the whole area.

I demand spot-by-spot evaluation and preservation of our precious resources, which have taken hundreds of years to grow.

Put a preservation order on these ancient trees!

Highlight unjustified damage.

Advocate for environmentally friendly approaches.

Insist on balanced solutions.

Demand greater detail about work to be done.

Insist on a peer review.

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 is a wild and scenic river. 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.

Karen Kunstler

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:34 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments on USACE Contract Project 3B

From: Tom <tom@tomcuster.com>
Sent: Monday, February 19, 2024 4:50 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments on USACE Contract Project 3B

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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

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

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

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

A The American River is extremely important to me and the quality of life in my community. I walk with my dogs along the affected portion of the river on average 3 x week. Often more. I value having this natural area in the midst of the city. This river is a designated a Wild and Scenic River that host beaver , otter, deer and other wild life seldom seen in an urban setting. This river suffered from the unrestricted mining early and through much of the 1900s and it has taken a couple generations to return to a more wild state. Now the proposed project threatens to destroy this wild state for a couple more generations. I have strong concerns that care is not being taken to preserve as many trees as possible. I've seen the tree inventory from USAC showing

60+yr old trees will be removed from within the park just for staging of machinery. Not to mention from the island in the middle of the river. This just doesn't seem right.

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 clear cut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all. I see in the report that additional out flows have been added to Folsom dam that will increase the flow rate for longer periods but yet the dam is being raised to hold more water. So it's not clear why we would need higher flow rates.

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 consideration of alternate approaches. Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. **The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.**

I am asking that:

- B**
- The community is provided with a spot-by-spot, tree-by-tree need benefit report/presentation for the project. The report is very confusing and hard to follow. We need to extend to comment period past Feb 23 to get all the details and understand this project fully
 - 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" and provides a natural environment rarely found in an urban setting like Sacramento.

The cost of losing this natural quality is unmeasurable and we should be give clear proof that every option of preservation has been taken and the benefits of the project will indeed outweigh the cost.



Tom Custer

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:33 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments on American River Common Features (ARCF) 2016 SEIS/SEIR – December 2023

From: Antony Smith <uniquesmith23@hotmail.com>
Sent: Monday, February 19, 2024 4:49 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: RichDesmond@saccounty.gov; SorgenKC@saccounty.gov
Subject: [Non-DoD Source] Comments on American River Common Features (ARCF) 2016 SEIS/SEIR – December 2023

- 1 I almost fell out of my chair when I saw what Contracts 3B and 4 would do to the urban riverine forest east of Watt Avenue on the American River. The destruction of over 500 trees, along with shrubs and grasses would create long-lasting, or even permanent, damage to this section of the "Crown Jewel of Sacramento", a Wild and Scenic River.
- 2 Contracts 4, 3A, and 3B must be re-evaluated.
- 3 There has to be a better way to ensure flood safety, likely using more natural means of reinforcing the levies. And since current trees and their root systems act to slow currents near the levies, the risk of catastrophic erosion is likely overstated.
- 4 The current riparian forest supports a variety of animal and bird life, in a natural setting very rare in a big city. Destruction of the forest and its replacement by bare soil over riprap represents ecological destruction.
- 5 This cannot go on as planned without further evaluation of less destructive, more finely tuned alternatives.

Tony Smith

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:29 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: Mike Wang <gaemul@gmail.com>
Sent: Monday, February 19, 2024 4:46 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

The American River Parkway and its woods and wildlife are extremely valuable to me. I am directly affected by any changes made to the levee and the surrounding area, because my house is immediately adjacent to the levee on Crondall. Not only will the changes to the landscape adversely affect me, but the changes to the River access point next to my house as well. I think that we

should approach any changes to this area very cautiously with an emphasis on the least invasive method. While I would like the levees shored up, we need a more thoughtful approach.

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

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

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

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

grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose

residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges,

which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower

American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive

alternatives, rather than the devastation that is being proposed for Contract 3B.

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

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

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

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

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

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

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

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

Thank you.

Michael Wang

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:28 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 mamola <j.mamola@att.net>
Sent: Monday, February 19, 2024 3:26 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR): My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me. [YOU CAN CUSTOMIZE HERE WITH YOUR PERSONAL CONNECTION WITH THE PARKWAY AND THE WILD AND SCENIC AMERICAN RIVER]. I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River. I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project. Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage. The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR,

making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts. Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR. Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided. The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone. Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data. Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings -- could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms). Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks

bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need. I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too? I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B. I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil. The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River. The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis. The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement. If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated. This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In

particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected. The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves. Thank you. [NAME]

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:27 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: ebmilstein@alumni.psu.edu <ebmilstein@alumni.psu.edu>
Sent: Monday, February 19, 2024 3:32 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; AmRivTrees@gmail.com
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

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

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

The American River Parkway (ARP) and its woods and wildlife are extremely valuable to my family and I. We have walked, hiked, biked, fished, and enjoyed the aesthetic beauty and solitude of this unique unspoiled area. We are daily users of the ARP and its bike trail is my commuter route to work.

My children were fortunate enough to grow up along the ARP and we have spent many happy hours there exploring nature and simply enjoying the natural beauty of this gem. Simply put, it is an important part of our lives.

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. Furthermore, as a longtime resident of this community that loves the ARP, I resent the destruction of beautiful riparian habitat that has happened already! The Corps and its contractors have come into OUR neighborhood and with inadequate notice, has forced and unwanted and ill-thought project on OUR community!

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

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation,

CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that

the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced

modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much-loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation

waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

Additionally, “Recreational” impacts have been inadequately addressed in theory and in practice. The bike trail detours both as implemented for the current work and as planned in the EIR/EIS are at best uncomfortable and at worst dangerous! As an example, the bike detour route for Contract 4A (Figure 3.5.3-2) would take cyclists onto dangerous streets in a poorly lit, unsafe industrial area! And while routes look satisfactory on maps in an environmental document, the actual quality of the route as well as how the

contractors interfere with the detours on a day-to-day basis causes confusion, delays, and unsafe situations.

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

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

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

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

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are

they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

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

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

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

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under

USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come and should reflect the far greater care that this treasure deserves.

Thank you.

CDR Eric B Milstein, USN-Ret.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:26 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Renae Best <renaebest@hotmail.com>
Sent: Monday, February 19, 2024 3:15 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: publiccommentarcf16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

I am a member of the AMERICAN RIVER parkway and ride my horses on the equestrian trails.

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

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

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable”

after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

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

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

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

Thank you.

Lorraine Best

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:26 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

From: Claudia Kirkpatrick <kirkmusic@hotmail.com>
Sent: Monday, February 19, 2024 3:10 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommenjtARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

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

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

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

A The American River Parkway is extremely valuable to me. I walk and bike there frequently. I have gone down the river in a canoe. I watch the goats mow down the weeds, and watch fisherman along the banks. This is the crown jewel of Sacramento. Being there fills me with peace and joy. We need this in these stressful times!

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 clear-cut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

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

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

2. Rip Rapped streambanks present significant negative consequences:

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

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

- Experts disagree about the erosion risk along this stretch of the river. More empirical data was recommended, but generally concluded that erosion resistant material was present and significant scour below it was not anticipated. Seepage data show no issue for seepage, especially after the deep slurry walls were added inside the levees.
- 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 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 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 environmental justice issue has not been adequately addressed in the environmental analysis.

We demand that:

1. Demand Spot-by-Spot Evaluation:

- Insist on a thorough demonstration of the spot-by-spot need and benefit analysis.
- Encourage the evaluation of alternative methods that are targeted and less destructive to habitat and wildlife.

2. Highlight Unjustified Damage:

- Draw attention to the unjustified massive damage proposed for a straight stretch of the river.
- Reference modeling data showing low bank velocities in this specific area.

3. Advocate for Environmentally Friendly Approaches:

- Promote the consideration of "spot fixes," small equipment, and maintenance.
- Support the use of stabilizing vegetation, aligning with the National Park Service's recommendation.

4. Insist on Balanced Solutions:

- Emphasize the importance of finding ways to achieve both tree preservation and any erosion work (if needed) for flood protection.
- Encourage a balanced approach that addresses environmental concerns.

5. Demand Greater Detail about Work to be Done

- The current environmental documentation does not show in adequate detail what specific work will be done.

6. Insist on a Peer Review

7. Do not proceed with subcomponents until justification and alternatives are provided.

- The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and 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.

8. Lasting care of Sacramento's Crown Jewel:

- 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.

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.

Claudia Kirkpatrick

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:24 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Heather Frye <hifrye100@gmail.com>
Sent: Monday, February 19, 2024 2:03 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

The American River Parkway and its woods and wildlife are extremely valuable to me. I live near the river and I visit the parkway daily.

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

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

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

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

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River³ a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said

they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

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

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

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

Thank you.

Heather Frye

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:23 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: Debbie Bakken <dbakken2010@gmail.com>
Sent: Monday, February 19, 2024 1:15 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

We bought our townhouse on Rio Bravo Circle back in 2007 because of the beautiful mature trees lining the river. I am blessed to have a beautiful view of all of this along the Levee from my townhouse. In the winter, I can see egret wading along the shore of the island. In the spring, you can occasionally see deer in the green grass area. While on our nature walks I see coyote hunting for squirrels, I admire the wonderful Raptors who soar above me and have nests in the trees like so many birds do. I can lay in bed and hear the owl who lives in the tree on the river. I hear the geese that hang out in the island area. I have launched my kayak off the shores by the park. I have a high stress job and to help unwind, I go down to the river there and listen to the rapids. The connection to nature helps ground me. So many animals call this section of the river their home. I fear all of this will be gone if you proceed in the manner I have read. Why are you not using the Engineering with Nature guidelines?

Before we bought the townhouse along the river, we lived in a house on Twin Falls Drive, across the street from the river. We saw the river in 1985 when came close to the top of the Levee. The trees are what slowed the flow along the edges. Without these mature trees with all their roots, you will be creating a fast-moving channel of water that I fear will put us all at risk for failure.

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

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

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Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American

River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

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

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

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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

generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Debbie Bakken

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:23 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Trees at the American river

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

From: ib2luce (null) <ib2luce@aol.com>
Sent: Monday, February 19, 2024 1:14 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Trees at the American river

1 | I live near the river where you plan on removing all the trees for erosion control. This was attempted about 10 or so years ago and it didn't work in the area they did it on. These trees provide adequate erosion protection, shade, oxygen, beauty, and a great place for animals and birds. I am totally against this project.

Thank you ,
Bob Luce
Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:22 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

From: Emilia Goldstein <emiliajgoldstein@gmail.com>
Sent: Monday, February 19, 2024 12:26 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me. I live near the river and I visit the parkway daily.

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

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

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

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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

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

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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

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

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

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

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Emilia

—

Emilia Goldstein

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:18 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] No response

-----Original Message-----

From: DALE SCRIBNER <renbircs@pacbell.net>
Sent: Monday, February 19, 2024 11:49 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] No response

1 | My name is Dale Scribner, we live at 6830 Arabella Way, Sacramento, CA 95831. We filed the proper paperwork to support our claim of property damages. The case made it through the system and was sent to a local agent from which we never heard from.

I request a followup to find out what happened to our case.

Thank you,

Dale Scribner

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:16 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments on the Lower American River Projects

From: Annette Faurote <afaurote@hotmail.com>
Sent: Monday, February 19, 2024 11:20 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments on the Lower American River Projects

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.

- *"People who will not sustain trees will soon live in a world that will not sustain people". ~Bryce Nelson*
- **The American River Parkway as it exists today is extremely valuable and important to me.**
- I bought my home near the American River Parkway BECAUSE of it's mature natural riparian ecosystem. In this crowded world it calms my anxiety. I walk 6 days out of 7 (and bike frequently too) along it's many paths. The destruction near Campus Commons caused extreme grief, loss of sleep and nightmares for me. (I realize this area was in greater flood danger and may have warranted much of this work). But now the plan is scorced earth once again along the next section of River. First, I want to ask **does your research discuss the distress, increased anxiety and perhaps mental decline in the population regarding this work?** Recent research documents the importance to mental health of maintaining natural areas for urban populations. **There is NO mitigation to this mental health damage for this proposed project.** Recreation along a healthy riparian habitat is a necessity to the physical and mental health of our community.

B

- I do understand the need for flood protection. I live *very* close to the levee. However, I also understand that there are differing opinions regarding this proposed alternative. More research should be done for this project. Other experienced engineers outside of the Army Corps have differing options regarding what needs to be done to assure flood protection. Some engineers believe this work won't even increase flood protection.

C

- Most SEIS/SEIR analysis have alternatives. There is usually "no action" to extreme action of some sort with alternatives in between. Here, there are NO suggested and researched alternatives. JUST, this clear cutting of hundreds of trees and vegetation, damage to the soil ecosystem is the only option. I need to see well researched alternatives in this study.
- I also understand that the Army Corps has a book that was recently written "**Engineering with Nature**" by Dr. Todd Bridges. This project on the Wild and Scenic American River needs to incorporate the methods outlined in this book. Why was this not done???? There is a different way.
- The flow charts show that much of this proposed project is on a relatively straight portion of the River with slower flow velocities not necessitating the extreme methods that were warranted around River Park and Campus Commons. Our River is NOT a one size fits all project. This project should be looked at in greater detail targeting spots that need work.

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:

D

- Trees suck carbon out of the air, hold soil in place during heavy rains, help retain moisture in the soil during drought and provide important shade in a hot climate. These are the services our 100 and 200 year old trees provide. A few shrubs grown over the next 10 years are not going to mitigate the loss of our ancient trees. Are you planting more valley and live oaks?

E

- Removal of trees and vegetation will make biking and walking too hot for much of the year in Sacramento. It will make boating more dangerous with the proposed rock placements making shore stops hazardous. It will make swimming dangerous and difficult. You have not adequately addressed these issues.

- Additionally, the greatest reason for decline in birds and wildlife in our country is due to habitat loss and climate change. This project as now described will further the loss of habitat for birds and wildlife while spewing CO2 for two years during this construction project. This destruction of habitat must stop. The proposed "mitigation" comes nowhere close to mitigating this loss.
- 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.

Dana Faurote

"The trees act not as individuals, but somehow as a collective. Exactly how they do this, we don't yet know. But what we see is the unity . What happens to one happens to us all. We can starve or feast together. ~ Robin Wall Kimmerer PhD

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:15 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: Todd Keeler-Wolf <keelerwolftodd@gmail.com>
Sent: Monday, February 19, 2024 11:01 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

A | I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other

reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR

comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Todd Keeler-Wolf, Ph.D.
Ecologist and Retired Senior Scientist, Specialist

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:13 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Martha <rosebudrobins@gmail.com>
Sent: Monday, February 19, 2024 10:33 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

A My husband and I, Glen and Martha Robins, have been residents 2646 Kadema Drive, Sacramento, CA 95864 for over 20 years. Our house backs up to the American River levee. We live here because of it's close proximity to the beautiful American River and its parkway, the quiet peaceful neighborhood with lots of trees, and the nature and recreational amenities of the parkway.

We just learned yesterday from Peter Spaulding, www.americanrivertrees.org, and www.sarariverwatch.org about the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B (where we live!), and 4A and 4B. We have **INCREDIBLY** serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway and its trees and nature are extremely valuable to us and to Sacramento!

B **We are TREMENDOUSLY angry that we have not received any information on plans, schedule, and consequences for our direct area. Why haven't we been notified of these Army Corps public meetings that apparently occurred January 10 and 16? We are absolutely opposed to having the Parkway behind our house become a vast desert of dirt like what has already been done along the river near California State University, Sacramento.**

Glen and I are **unconvinced** that this "potential bank erosion" work is necessary along this section of the American River. We believe that the proposed approach of clearcutting and leaving bare riverbanks, 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. **We strongly oppose the**

devastating methods being proposed to address potential bank erosion concerns. We believe that **the environmental analysis does not adequately characterize the significant and irreversible impacts to the Parkway, including all wildlife, nature lovers, and cycling enthusiasts**. It does not convincingly provide adequate mitigation, nor does it consider all feasible alternatives to supposed "unavoidable" impacts, including alternative options on a much more fine-grained scale.

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.

Our specific concerns and comments include the following:

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 (our home) and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.*

B
(cont'd) 2. *Extend the formal comment period of these projects to Fall, 2024.*

3. *Adequately notify all stakeholders, conduct extensive public meetings, and get sufficient approvals by all affected parties in our city and county **before** moving forward.*

C 4. ***Hire Dr. Todd Bridges** (<https://www.erdc.usace.army.mil/About/Leadership/Bio-Article-View/Article/1756837/dr-todd-s-bridges/>) **to lead these projects** using his principles of engineering with nature to create a safe levee system as well as an environmentally robust and beautiful landscape that Sacramento residents love and can be proud of.*

5. *Make it your goal to protect and preserve the treasure and beauty of the American River Parkway and as many trees as possible! They make the parkway and our city a beautiful and healthy place to live!*

The **American River Parkway is often called the "Crown Jewel of Sacramento."** These proposed **decisions will destroy this irreplaceable landscape** for generations to come and should instead reflect the care that this treasure deserves. Thank you for your consideration of our concerns and of many others in our area who are equally concerned. It is better to do it the right way than to rush through this and have it become a disaster.

It is your responsibility and indeed your duty to take the necessary time and effort to get this right.

Sincerely,
Glen and Martha Robins

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 8:56 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Nina Nazimowitz <nina.nazimowitz@sanjuan.edu>
Sent: Monday, February 19, 2024 10:24 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not "less than significant" nor are they "mitigated to less than significant". When there are "significant unavoidable" impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the "Crown Jewel of Sacramento". In 2012 it was designated a "Regional Treasure". The Contract 3B actions move into a zone designated a "Protected Area" under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Nina

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:20 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: Mia Shepherd <miashep75@gmail.com>
Sent: Tuesday, February 20, 2024 10:17 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR)
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.

Mia Shepherd

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:13 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Save American River Trees - Comments ARCF 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

From: Ellen Schaefer <ellen@groupworks.net>
Sent: Tuesday, February 20, 2024 10:03 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Save American River Trees - Comments ARCF 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway is extremely valuable to me.

- I am a cyclist and hiker and nature journaler and birder. Read the book The Nature Fix. We NEED nature and wildlife habitat in our area.

A

Some countries are intentionally putting in green space to enhance the well being of citizens. DO NOT destroy so many Parkway trees!!!!

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.

B | This proposed destruction is an unnecessary tragedy that is harmful to our area. Please find less destructive solutions.

Thank you.

Ellen Schaefer

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:12 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Tim Sebright <timsebright@gmail.com>
Sent: Tuesday, February 20, 2024 9:32 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

A

The American River Parkway is extremely valuable to me. My wife and I use and enjoy it regularly, and its trees and landscape are a vital and needed escape from the city.

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, but are not limited to, the following:

1. Limited evidence for unnecessary removal of trees and vegetation
2. Impact on wildlife and critical habitats is substantial and unnecessary
3. Loss of mental health benefits from trees, vegetation and green spaces
4. Impact on air quality
5. Environmental justice, as the parkway is accessible to those with limited means to travel

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.

Tim Sebright

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:10 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Candace Northrop <cnorthrop49@gmail.com>
Sent: Tuesday, February 20, 2024 9:19 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not "less than significant" nor are they "mitigated to less than significant". When there are "significant unavoidable" impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the "Crown Jewel of Sacramento". In 2012 it was designated a "Regional Treasure". The Contract 3B actions move into a zone designated a "Protected Area" under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Candace Northrop

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:08 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Janice Cowden COWDEN <jmcowden@comcast.net>
Sent: Tuesday, February 20, 2024 9:04 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me. I walk the parkway in this area weekly and it would be a shame to destroy what so many of us go to the river for. It's a beautiful wooded area, always wildlife sightings, and a nice escape from the hustle, bustle city life.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained

scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American

River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features

except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were

not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Janice Cowden

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:06 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Trenton Pitts <ciscopitts@hotmail.com>
Sent: Tuesday, February 20, 2024 8:45 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

[YOU CAN CUSTOMIZE HERE WITH YOUR PERSONAL CONNECTION WITH THE PARKWAY AND THE WILD AND SCENIC AMERICAN RIVER].

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Trenton Pitts

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:05 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 SEIS/SEIR-December 2023

From: wendy cioni <wcioni1@gmail.com>
Sent: Tuesday, February 20, 2024 8:34 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments regarding American River Common Features (ARCF) 2016 Draft SEIS/SEIR-December 2023

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 have lived and recreated along the American River for 35 years. It gives me great solace to walk in such a beautiful environment surrounded by ancient oaks and the wildlife they bring. I cycle, walk, kayak and paddle board on the lower American. It is an amazing wildlife area within the greater city of Sacramento. Recently, due to injury, I have not been able to cycle or kayak the river, so have rediscovered walking along the shaded trails beside the American. These

experiences have been transformative. These forested paths serve thousands of us.

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:

Continuing the devastating removal of every living plant from the banks of the American River, as was done west of Fair Oaks Blvd would be devastating to our community. I cannot see the need to remove every tree and plant. I can see thinning some non-native plants and trees, but total removal is horrible and impacts our entire city.

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.

Wendy Cioni

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:03 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS; Duey, Keleigh L CIV USARMY CESPCK (USA); Martin, Nathaniel J CIV USARMY CESPCK (USA); Romine, Guy K CIV USARMY CESPCK (USA)
Subject: [EXT] FW: U.S. Army Corps of Engineers Headquarters Contact Form: Dr. Todd Bridges Nature Based Initiative Comments Regarding American River Common Features (ARCF) Re:

-----Original Message-----

From: Stalker, Tyler M CIV USARMY CESPCK (USA) <Tyler.M.Stalker@usace.army.mil>
Sent: Tuesday, February 20, 2024 7:52 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; Bruton, J Paul CIV USARMY CESPCK (USA) <Joseph.P.Bruton@usace.army.mil>
Subject: FW: U.S. Army Corps of Engineers Headquarters Contact Form: Dr. Todd Bridges Nature Based Initiative Comments Regarding American River Common Features (ARCF)Re:

-----Original Message-----

From: Pawlik, Eugene A Jr CIV USARMY CEHQ (USA) <Eugene.A.Pawlik@usace.army.mil>
Sent: Tuesday, February 20, 2024 1:05 AM
To: Stalker, Tyler M CIV USARMY CESPCK (USA) <Tyler.M.Stalker@usace.army.mil>
Subject: FW: U.S. Army Corps of Engineers Headquarters Contact Form: Dr. Todd Bridges Nature Based Initiative Comments Regarding American River Common Features (ARCF)Re:

-----Original Message-----

From: noreply@dma.mil <noreply@dma.mil>

Sent: Friday, February 16, 2024 8:43 PM

To: Pawlik, Eugene A Jr CIV USARMY CEHQ (USA) <Eugene.A.Pawlik@usace.army.mil>

Subject: U.S. Army Corps of Engineers Headquarters Contact Form: Dr. Todd Bridges Nature Based Initiative Comments Regarding American River Common Features (ARCF)Re:

CAUTION: Your email client may display clickable links. The data in this email is provided without modification, as the user entered it. Before you click or use any link provided in this email, please confirm the authenticity of the link.

This message was sent from the U.S. Army Corps of Engineers Headquarters website.

Message From: Christie Vallance

Phone:

Response requested: Yes

Message:

1 My comments focus on the lower American River Sacramento, CA 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.

Section 3B is my home and is very important to me as I moved here to be near the river trails and bike trail. My family and I use this area almost daily for our health & wellbeing. We hike, bike, birdwatch, take nature photos, and swim

2 during the summer. 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 & want NATURE BASED INITIATIVE rather than CURRENT PLAN

PROPOSED IN 2016. Save a wildlife corridor. Christie Vallance

Ref Id: 3diDRc9kPkW_6EOTNeEd4g



FROM THE DESK OF
ASSEMBLYMEMBER LLOYD LEVINE (RET.)

February 19, 2024

United States Army Corps of Engineers
1325 J Street, Floor 1
Sacramento, CA 95814

To Whom It May Concern,

1 I am writing today to express my grave concerns regarding the recent and future work planned and overseen by the US Army Corps of Engineers along the American River Parkway. I absolutely understand the need for levee reinforcement – I live in the flood zone – but believe there must be a way to balance the need for levee improvements and flood safety with the existing environmental sensitivity and recreational benefits the river and parkway provide.

2 While I am not an engineer, as a former California Legislator, I understand the need to balance competing imperatives from public safety to the environment, to community and public preference. The work completed recently between Glen Hall Park and the Guy West appears, to all reasonable observers, to have paid scant, if any, attention to the environmental impacts, habitat loss or aesthetic/recreational aspects of the river. It appears there was no balancing competing interests.

3 I respectfully request the Corps employ a far more nuanced, environmentally and aesthetically thought-out approach for all future work on the American River levees, specifically and most immediately American River Erosion Contracts 3B North, 3B South, and 4B.

4 Nearly 8 million people – including myself – use the parkway each year, from avid runners, to families, hikers, bird watchers, rafters, kayakers, cyclists and many more. The river and parkway are an oasis in the city, a nearby sanctuary where people can safely exercise and enjoy nature within just a few miles of where they live and work. The work proposed will dramatically and irrevocably damage the natural beauty of the parkway.

5 As I understand them, American River Erosion Contracts 3B North, 3B South, and 4B include removing hundreds, if not thousands more trees and other changes will destroy the habitat of numerous species that make their homes along the river. With the availability of computer modeling, I think it should be possible to simulate the impacts of various flow rates and river levels to identify potential vulnerabilities and create a workplan that addresses those vulnerabilities. Further, I would think there must be other construction techniques that can be performed in a way that doesn't require removing nearly every single tree for several miles along both sides of the river.

6 The objective should be to remove as few trees as possible and have the least impact as possible. However, it appears that rather than work around existing nature and fully mature trees the Corps simply eliminated nearly everything along the river. Continuing that approach is unacceptable to me and to the millions of people who utilize the bike trail and nature area every year.

7

Again, I respectfully request the Corps take a much more nuanced, balanced, and sensitive approach to the upcoming work and that you explore every option possible to achieve the flood protection necessary while protecting the wildlife, natural lands, mature trees, recreational aspects and majestic beauty of the urban wild area. If we could land a man on the moon with 1969 technology, surely, we can do far, far better than we did on the recently completed American River levee work.

Respectfully,



Lloyd Levine

Cc:

Congresswoman Doris Matsui
Governor Gavin Newsom
Lieutenant Governor Eleni Kounalakis
Senator Angelique Ashby
Senator Roger Niello
Assemblymember Josh Hoover
Assemblymember Kevin McCarty
SAFCA Boardmembers
Supervisor Phil Serna
Mayor Darrell Steinberg

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:58 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Wayne Orgar <weorgar@yahoo.com>
Sent: Tuesday, February 20, 2024 7:49 AM
To: PublicCommentARCF16@water.ca.gov
Cc: 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:

Intro | My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

1 | I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. I've seen the project results downstream. I don't like the idea of similar destruction near my neighborhood. The disruption of animal life in this stretch of river would likely not allow recovery of animals any time soon. Please find a better way.

Thank you,
Wayne Orgar

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:53 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Request for Extension to the Public Comment Period for American River Common Features (ARCF) 2016 Draft SEIS-SEIR

From: Peter Spaulding <petenyvtca@comcast.net>
Sent: Monday, February 19, 2024 9:06 PM
To: PublicCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: Knapp, Jonah@CVFPB <jonah.knapp@cvflood.ca.gov>; Kathryn.Baines@cvflood.ca.gov; Amber.Woertink@cvflood.ca.gov; Jane Dolan <Jane.dolan@cvflood.ca.gov>; Supervisor Rich Desmond <richdesmond@saccounty.gov>; Pat Hume <pathume@saccounty.gov>
Subject: [Non-DoD Source] Request for Extension to the Public Comment Period for American River Common Features (ARCF) 2016 Draft SEIS-SEIR

Please extend the Public Comment period for the American River Common Features (ARCF) 2016 Draft SEIS-SEIR to April 1 2024 and conduct an in-person public meeting with USACE technical experts present at least 2 weeks prior to the Public Comment deadline.

1 I realize the comment period has already been extended 18 days, from February 5 to February 23.
I believe that an additional extension is warranted for the following reasons:

1) On February 16, the following was posted to the USACE American River Levees Project website:

Note: A public commenter brought to our attention that Section 3.5.2 *American River Erosion Contracts 3B North, 3B South, and 4B*, in the Draft SEIS/SEIR omitted Figures 3.5.2-11 and 3.5.2-12 (page 3-42). These diagrams have been available to the public in the Presentation Slides under Public Engagements on Slide Number 11. You may also view the link below. These Figures will be added to the Final SEIS/SEIR.

[Figure 3.5.2-11, 3.5.2-12](#)

[LAR C3B trees upstream 20240216](#)

[LAR C3B trees downstream 20240216](#)

3) 2) At the January 10 and 16 Virtual Public Meetings, attended by approximately 167 and 195 persons respectfully, no USACE technical representatives were present. Participants were told they could ask questions, and the Corps would respond. I participated in both meetings and I have never seen any response from the Corps to the multitude of questions that were asked, with the exception of the recent post to the website described above. Those questions should be answered so that people can take them into consideration as they prepare to submit comments.

4) 3) The public outreach on the Project has been abysmal. Our community members have personally spoken with hundreds of residents who live adjacent to, and recreate along, the Parkway, in the vicinity of Howe Ave, Watt Ave, Kadema Drive, Estates Drive and Larchmont Community Park. The vast majority of these people had no knowledge of the upcoming Contracts 3B, 4A and 4B, and all but a very few have serious reservations about the project and the loss of trees and vegetation. The American River Parkway is not some local, neighborhood park. It is the "Crown Jewel of Sacramento", the only state and federally designated Wild & Scenic River that flows through a major metropolitan area in the country. At a minimum, ALL residents of Sacramento, Placer, El Dorado and Yolo counties should be notified of the upcoming contracts and invited to review and comment.

5) For these reasons, I respectfully request that the public comment be extended. This extension should begin AFTER all residents of Sacramento, El Dorado and Placer Counties have been notified of the Project. At a minimum, the extension should be at least 45 days from the date of the new information posted to the website. At least 2 weeks prior to the end of the Public Comment period, an in-person Public Meeting with USACE technical experts present should occur. The two-week period would give participants time to formulate their comments. This would extend the Comment Period to April 1, 2024, at a minimum.

Thank you for your consideration

Sincerely,

A handwritten signature in dark ink, reading "Pete Spaulding". The signature is fluid and cursive, with the first name "Pete" and last name "Spaulding" clearly distinguishable.

Pete Spaulding

“Protection without Devastation”

www.americanrivertrees.org

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 9:54 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: sandy schuler <sandyandjenny@hotmail.com>
Sent: Monday, February 19, 2024 9:55 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

A The American River Parkway is extremely valuable to me. The natural beauty of the trail has provided a place to be away from the stresses of the day. The trees and brush provide much needed shade and cooling, especially in the summer. Hearing the birds sing in the morning has alleviated feelings of anxiety along with movement helps me wind down and prepare for the day. I think of the trees as giving mankind the oxygen we breath as they uptake the carbon dioxide that we put in the air. I recently saw the area around Sacramento State University that has been denuded by the total removability of all vegetation from the bike trail to the river. It was heart breaking to see.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

My specific concerns and comments include the following:

- B 1. A hundred trucks per day adds damage to roads and levees. Is there budget for improving the levees and damaged roads?
- C 2. Staging equipment in the parkway where adults exercise, elementary schools visit, families play, and recreational events requires mitigation and hardship on other areas of the parkway.
- D 3. What is the asbestos amount contained in the jagged quarry rock? What is the associated dust that is spread due to bringing in the rock to family homes, local schools, construction worker, and individuals on the trail.
- E 4. A hundred trucks daily create toxic air pollution from the diesel fuel. 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).
- F 5. With Global Warming and NetZero 2050, has anyone looked estimated the lost of trees absorbing carbon dioxide and producing oxygen. AI technical estimates, with 500 oak trees at 50 years of age could absorb approximately 600 tons of CO₂ per year and produce 858 tons of oxygen. (This is an estimate. US Forest Service estimates an average CO₂ absorption per oak tree per year is 48lb, and per photosynthesis equation, O₂ produced per pound of CO₂ absorbed is 1.43lb). Trees and vegetation along the river are a valuable way to mitigate climate change.
 - a. Global deforestation: This project adds to the global deforestation which significantly impacts CO₂ absorption and contributing to climate change. The World Resources Institute: <https://www.wri.org/>
 - b. Net Zero 2050 goals: Achieving NetZero requires not only protecting existing trees but also planting many more to offset carbon emissions. California Air Resources Board (AARB) <https://ww2.arb.ca.gov/>
 - c. The above example of CO₂ absorption and O₂ produce is a rough example. Was the number and species of trees being removed determined and did we look at the carbon sequestration and oxygen production?
 - d. Have alternatives been explored such as target intervention or selective thinning to get to the banks?
- G 6. The area along the river that was recently denuded is showing signs of erosion due to the rains. How will this area be mitigated? Seemingly new vegetation will take years to grow. What happens to the banks if the river levels swells, and the denuded banks are washed away?
- H 7. Was there any consideration for the bird life and other wildlife? We are talking about eleven (11) miles of clearcutting damaged habitat for many years.

- I 8. On a walk, this past summer, the noise, and the pollution from the trucks was noticeable. In my opinion, the air smelt so bad that I did not want to come back. I feel for the people that live close by or the schools nearby. And I wonder how this effects their health.
- J 9. I love to kayak and noticed that the denuded area around Sac State University lacks area for a kayak to safely get to the shore. The area is not conducive for recreational purposes and seemingly was not a consideration.

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The 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.

Sandy Schuler (Consulting Electrical Engineer, PE)



Butterfield-Riviera East
Community Association
P.O. Box 276274
Sacramento, CA 95827
Email: jmorgan1@ix.netcom.com

February 19, 2024

Mr. Guy Romine
U.S. Army Corps of Engineers, Sacramento District
Email: ARCF_SEIS@usace.army.mil

Mr. Josh Brown
California Department of Water Resources,
Central Valley Flood Protection Board
Email: PublicCommentARCF16@water.ca.gov

Subject: Comments on Draft American River Common Features, 2016 Flood Risk
Management Project, Sacramento, California
Supplemental Environmental Impact Statement/Subsequent Environmental Impact
Report XIV

Mr. Romine and Mr. Brown:

I. Introduction

These are the comments of the Butterfield-Riviera East Community Association (BRECA) 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 Butterfield-Riviera East Community Association (BRECA) is a membership based community organization. Our goals are to promote citizen involvement and enhance the community. The boundaries of our association are the American River on the north, Folsom Blvd. on the south, the Mayhew Drain on the west, and Paseo Rio Way (both sides of the street) on the east.

BRECA is located immediately upstream of the Contracts 3B and 4B area, in particular Site 4-1. People from our area hike, bird-watch, kayak and canoe in the

area. 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.

1 We wish to thank the U.S. Army Corps of Engineers (Corps) and Central Valley Flood Protection Board(CVFPB)/Department of Water Resources(DWR) 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

2 BRECA had and has a representative on the Lower American River Task Force (LARTF) and it's Bank Protection Working Group (BPWG), the latter of which was 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, geomorphology, and procedures that were involved in identifying the Contract 3B areas as being high risk. Also, it would be of value to compare and contrast the Contract 3B area to the Contracts 1 and 2 areas. We believe that in-person public meetings should be held wherein technical experts are made available to respond to questions and that one of those meetings should be a site visit.

3 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 perpendicular to river flow, 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 it's 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 hydrodynamic 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 bed shear stress of the river near the banks and increased the velocity and bed shear stress 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.

- 4 | First, were trees represented in the hydrologic models used by the Corps, and if so, how was this accomplished?
- 5 | Second, would the Corps and/or it's 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, BRECA 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. As above, we believe that the Corps should hold in-person public meetings to facilitate public understanding of the designs. We encourage the Corps and CVFPB/DWR 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?

- 6 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

- 7 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.

- 8 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 areas, 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).

d. Folsom Blvd. (Pepper Oaks) Staging Area

One of the staging areas proposed for Contract 3B work is private property. It is shown on DSEIS/SEIR p. 3-30, Figure 3.5.2-3 and p. 3-37, Figure 3.5.2-10 as adjoining Folsom Blvd. It is identified in the text, p. 3-49, as being near Pepper Oaks Dr. Actually it is located at 9425 Folsom Blvd., opposite the Butterfield Light Rail Station. This property has been of considerable interest to BRECA in the past because it is within the BRECA area and has been the subject of various proposals for development. BRECA strongly supports the placement of an urban park in this area. In particular, we wish to see the large trees surrounding house and out buildings be incorporated into the park. We see no reason why this could not be accommodated, as it concerns a small area of the parcel. Some questions:

- 9 Does the Corps have a contract or other agreement with the current owners concerning using this area as a staging area? If not, what mechanism is contemplated?
- 10 Is the Corps willing to guarantee that the large trees surrounding the house on the property will not be cut down or otherwise damaged by the property's use as a staging area? If not, why not?

III. Contract 4B

- 11 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 proposal should be removed from the final document and recirculated when there is adequate information for people to comment on it.
- 12 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. Miscellaneous comments

a. Aesthetics and Visual Resources: Long term impact significant

- 13 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."
- 14 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

- 15 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

- 16 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?
- 17 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. Cultural and Tribal Resources

- 18 In table ES-1, p. ES-28, it indicates CEQA impacts to cultural and tribal resources to be significant and unavoidable. Further in the document, in Tables 4.5.1-1 and 4.5.1-2 (p. 4-225 and 4-226) it indicates that these effects are due to the American River Mitigation Site (ARMS) proposal. The texts of the main report and Appendix B generally do a good job of describing why there is an impact. However, they do not include any information on the required consultation of the Corps with Cultural and Tribal entities regarding this proposal. Such information should be added in the final environmental document.

e. Organization of pages inconsistent

- 19 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.

f. Organization of appendices confusing

20

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 lacks 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.

V. 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.

=====

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

=====

James Morgan, BRECA Secretary

Gay Jones, BRECA Chair.

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 11:17 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Mia Shepherd <miashep75@gmail.com>
Sent: Tuesday, February 20, 2024 10:19 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

You don't often get email from miashep75@gmail.com. [Learn why this is important](#)

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.

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.

Mia Shepherd

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 10:34 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Barbara Domek <barbjds@yahoo.com>
Sent: Tuesday, February 20, 2024 10:32 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; publiccommentarcf16@water.ca.gov
Cc: 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

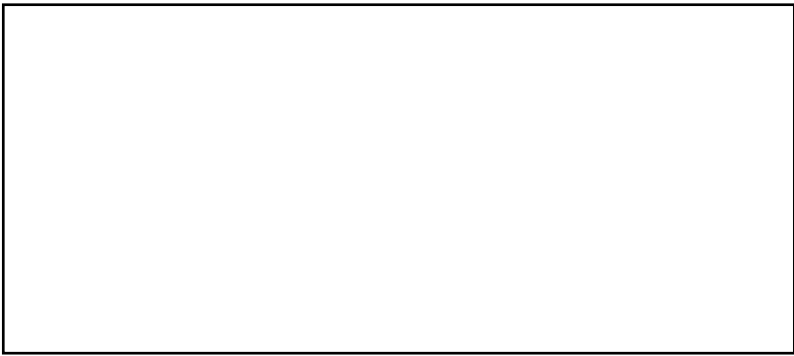
Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR),

1 The Army Corps of Engineers has itself produced publications on methods of erosion control that work with nature (Engineering With Nature, "EWN") which are proven to be viable and effective nature-based solutions that retain ecological biosystems and natural environments, yet these methods are not being used on the American River project in Sacramento. As you know, there ARE better environmental ways than using the outdated techniques of bulldozing and riprap launchable rock toes. These severe and destructive methods completely obliterate the irreplaceable mature natural riparian habitat along the riverbank, but you know there is a better way. Please modify the project plan to use methods that incorporate "Engineering With Nature" techniques which will preserve and protect our precious natural environment along this Wild and Scenic Lower American River corridor.

Please view the following three presentations produced by "Save the American River Parkway". The first presentation addresses the issue of engineering and hydrology impacts, the second presentation discusses proven alternative methods that are nature-based and leave precious habitat intact, and the last presentation addresses the issue of human mental health and nature's beneficial effect on our wellbeing.

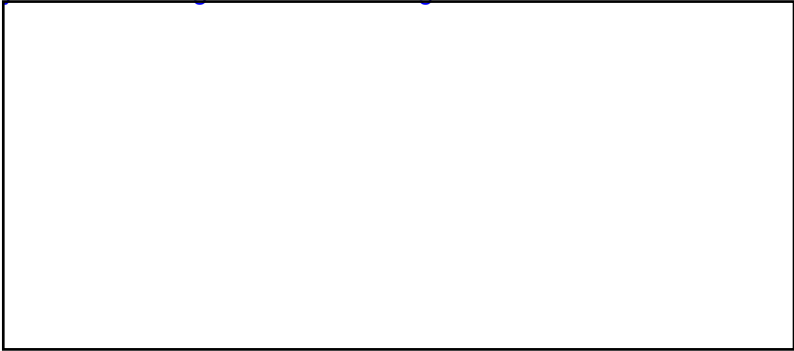
The links to these three excellent presentations are attached below.

youtu.be/QcGKiu94w2g?si=LjgOjlzdAG5euODj



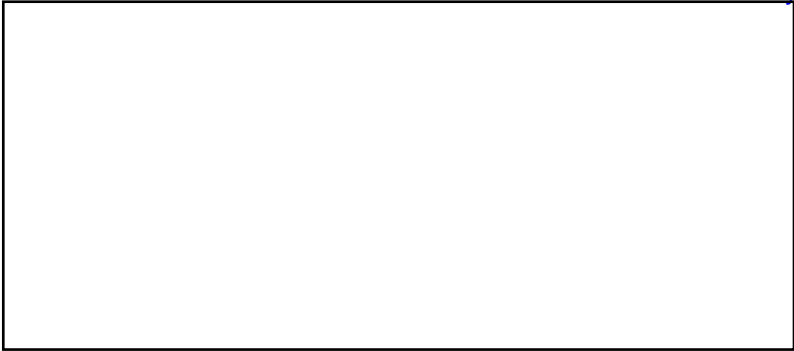
Concerns with USACE's Work on the Amercian River: Community Roundtable

<youtu.be/wV5TzghzvGE?si=iMmaZgSVAJXzKSfY>



USACE work on the American River: We Need Nature Based Solutions!

[Mental Health Concerns with USACE & Amercian River Community Roundtable](#)



Mental Health Concerns with USACE & Amercian River Community Roundtable

Sincerely,
Barbara Domek

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 1:09 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River project

From: Scott Anderson <scottrobertanderson@gmail.com>
Sent: Tuesday, February 20, 2024 1:00 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River project

You don't often get email from scottrobertanderson@gmail.com. [Learn why this is important](#)

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 my bicycle from Gristmill to Sac State everyday to get to work downtown. This is the one activity that makes me feel at peace and so grateful to have such a precious piece of nature in an urban environment. I walk all over on the river banks and have not witnessed any serious erosion problems with all the trees and vegetation. I can't even imagine the huge negative impact that this project would cause to me and everyone I know who enjoys this parkway. I witnessed the destruction first hand every day while riding through the Sac State area. It blows my mind how what they have done there is actually supposed to prevent erosion. If fact these pictures of the north bank near Howe ave show that it's making erosion WORSE!! In the last picture where it hasn't

eroded yet, how is that netting and straw suppose to hold back multiple high flows and how will anything grow back? There has got to be a BETTER way to repair isolated areas that may be a problem rather than decimating the entire riverbank!! Sincerely, Scott Anderson





From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, February 20, 2024 1:12 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River Project

-----Original Message-----

From: Louise Davis <louised5761@gmail.com>
Sent: Tuesday, February 20, 2024 1:10 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River Project

[You don't often get email from louised5761@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To whom it may concern:

I am emailing this letter in response to the American River Project. It would immensely affect the trees and wildlife as well as the community that live along the American River. The birds, squirrels, deer and wild turkeys have adapted here to call this place home. The old oak trees that have history here as well that have given homes to the owls, and squirrels. The community of walkers, and runners that find shade and rest along the way along with the wildlife in the area that you would like to bulldoze away. Sacramento is called the City of Trees, please consider in keeping that name for us here along the American River.

Respectfully,
Louise Davis

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 1:05 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Scott Ricci <pan4ever@sbcglobal.net>
Sent: Tuesday, February 20, 2024 12:22 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.

A | The American River Parkway is extremely valuable to us. We've hiked the portion of the river many times with friends that live in the adjacent neighborhood and will be impacted by the proposed changes.

My specific concerns include the following:

- B |
- 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.
- 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?
- 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.
- 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?
- 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.
- 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.

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.

Scott and Carol Ricci

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 12:20 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Lower American River Projects draft SEIS/SEIR, Contracts 3B, 4A and 4B.

From: Mike Hittle <mhittle24@gmail.com>
Sent: Tuesday, February 20, 2024 11:52 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Lower American River Projects draft SEIS/SEIR, Contracts 3B, 4A and 4B.

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

I find serious flaws with the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A I strongly question whether this “potential bank erosion” work is necessary along this section of the American River. Scientific literature points to the fact that riparian vegetation **increases** bank stability (Abernethy and Rutherford, 2000; Easson and Yarbrough, 2002; Krzeminska et al., 2019; Ott, 2000), while denudation has the opposite effect (Cendrero et al., 2022). In addition, bankside vegetation decreases flow velocity (Valyrakis et al., 2021), and can decrease flood crests, as seen on the Salinas River in 2023 (CNRFC, 2023). Notably, on larger rivers like the American, it is large, established trees such as those proposed for removal which provide the greatest stability benefit while immature trees must be given time before providing stabilization benefits.

B The affect of the proposed clear cutting can neither be understated. Removal of the large established trees along the American River will increase water temperatures (McGurk, 1990), decrease or eliminate the qualities which led to the Lower American being designated a Wild and Scenic River in 1981 (American (Lower) River, n.d.). Alongside these factors, as Sacramento-area residents have noted in other areas where this work has already been performed, there is a great deal of wildlife disturbance--most significantly to the public, the fact that rattlesnake and coyote habitats have been disturbed. Displacement of these animals and increased interaction with humans will doubtless lead to an increased risk towards children and pets.

C Next, this project exacerbates the negative noise, air quality, and recreational impacts Sacramento-area residents have been forced to absorb via the already completed USACE American and Sacramento River projects, U.S. 50 repaving, and UC Davis Medical Center expansion.

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 fewer environmental impacts) are not presented.

The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.

The American River Parkway is often called the “Crown Jewel of Sacramento”. These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.
Mike Hittle
Hydrologist
Sacramento

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 12:17 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Garrett McCord <gmmccord@gmail.com>
Sent: Tuesday, February 20, 2024 11:39 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is

mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the

Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and biotechnical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

-Garrett McCord

Garrett McCord

Grant Writer / Author / Editor / Writing Instructor

Melt: The Art of Macaroni and Cheese is Available for Order in Hardcover and Paperback!

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 12:16 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: rcorell1 <roger.corell@gmail.com>
Sent: Tuesday, February 20, 2024 11:27 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):

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, my family and my friends for several reasons...

- A great source of civic pride in being one of the longest and most scenic urban riparian forests in the world
- A vital wildlife corridor and migratory path for over 150 bird species
- Promotes both mental and physical health which is increasingly important in the world we live in

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are

“necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the

exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to

account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban

environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B—south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Roger Corell (a 28 year user of our precious American River Trail system)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:12 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Contract 3B Levee work

-----Original Message-----

From: ed0077@yahoo.com <ed0077@yahoo.com>
Sent: Wednesday, February 21, 2024 8:11 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Contract 3B Levee work

Dear USACE and SWRCB,

1 I have seen some of the levee work performed near the J Street bridge in Sacramento, and I read today about the Contract 3B site work. Vegetation is being removed and the levees are left as smooth sided embankments leaving the river similar to the canals in the CA State Water Project. This destruction of the natural habitat along the American River is a blight and I don't feel I have been informed sufficiently about this work. I understand the need to protect the levees, but I don't see the necessity of clearing such a large amount of vegetation to do this.

Has the USACE really evaluated the necessity of eliminating such large swaths of the ecosystem? They may think this is the simplest way of bolstering the levees but there are other, less destructive methods. Vegetation helps with erosion control. I know that there may be some cases where root bores have created seepage pathways; however, this can be remedied using more eco-friendly methods – methods that do not decimate for years trees and vegetation that provide habitat for numerous wildlife species and a natural setting that is the most important feature of Sacramento that is both recreational and air-purifying. The impact on my use of the river and the bike trail would be huge and the impact on wildlife seems catastrophic.

Elise Willmeth

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:09 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River

-----Original Message-----

From: Carsynn Gmail <carsynncosta@gmail.com>
Sent: Wednesday, February 21, 2024 6:12 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River

Hello

My name is Carsynn Costa and I live in Sacramento CA.

1 | Please stop this horrible desecration of our beautiful river. The American River is a salmon spawning location, has multiple wildlife and many species of plants. I came here as a child, brought my children here and now bring my children. Carsynn Costa

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:08 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Michelle Colwell <mmdavis29@gmail.com>
Sent: Tuesday, February 20, 2024 9:58 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A The American River Parkway and its woods and wildlife are extremely valuable to my family. My father-in-law is an accomplished ornithologist and my young nieces are nature enthusiasts who frequent the American River Parkway for bird-watching, swimming, walks, etc. I chose to live nearby so I could enjoy this beautiful stretch of land and river, a quintessential part of the Sacramento region.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much more targeted and less destructive approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” everywhere there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus

Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave

behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

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values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

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I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

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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.

Sincerely,

Michelle C. (Sacramento resident since 2002)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:07 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Rachel Wong-Degelos <racheljw3@yahoo.com>
Sent: Tuesday, February 20, 2024 9:25 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me

[YOU CAN CUSTOMIZE HERE WITH YOUR PERSONAL CONNECTION WITH THE PARKWAY AND THE WILD AND SCENIC AMERICAN RIVER].

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

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Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

[NAME]

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:07 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Craig Wilson <cmcclayw@hotmail.com>
Sent: Tuesday, February 20, 2024 9:03 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

A By way of background, I previously served as Chief Counsel to the California State Water Board and was appointed to serve as the State's first Delta Watermaster. As such I am very familiar with issues affecting water resources. This is one such issue.

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me. I live near the river and I visit the parkway daily.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are "necessary" for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed "unavoidable" impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§

21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Craig M Wilson
State Delta Watermaster (retired)

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:06 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Parkway

-----Original Message-----

From: Chad Wilson <chadreno100@gmail.com>
Sent: Tuesday, February 20, 2024 8:57 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Parkway

The work done by the USACE along the American River Parkway In Sacramento, CA is the most ridiculous thing I have ever seen in my entire life. Every person who sees what has been done here has the same reaction. What happened! This cannot happen again. Please stop all work in Sacramento along our Parkway. Removing all the trees and vegetation is not helping the levees or erosion, and is quite possibly making the situation worse. It is destroying a beautiful natural area that is enjoyed by millions of people.

Chad Wilson

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:03 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Shannon <snowstem@hotmail.com>
Sent: Tuesday, February 20, 2024 8:36 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

A The American River paths and banks (especially between Howe and William Pond) are extremely special to my family and me! We hike, swim, paddle board, wander the dirt paths under the incredible canopy of trees, admire the deer grazing along the shore and delight in all the animal sightings, picnic on the banks, or play in some form in or along the riverbanks almost daily. We would NEVER have moved to Sacramento without this incredible slice of nature. It is our connection with the real world in a sea of concrete and busy chaotic urban sprawl. It is our sanctuary, place of solace, our happy place. It is the home of many animals first and foremost. They were here first. The deer, foxes, otters, fish, birds, coyotes, snakes, and so many more species. It is the home of the trees, the trees that give life. Many of those trees are older than you and I combined. If nature itself is not enough of a reason, then please listen to all of us neighbors who would rather take the small risk of flood. I, personally, would rather lose my home than see the wild river habitat destroyed.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of

Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

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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.

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Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as

“scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Shannon Wilson and family

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:01 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: Catherine Harris <catherineharris916@gmail.com>
Sent: Tuesday, February 20, 2024 8:15 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway is extremely valuable to me.

I live off La Riviera with my husband, three-year-old son, and our 11-year-old German Shepard. Every weekend, we enjoy walking our dog

along the beautiful winding dirt paths beneath the trees that flank the levee; our dog and son swim together in the natural shallows along the river while my husband and I lounge on the beautiful sandy beaches. My husband's and my first date was riding our bikes through the beautiful trees along the river. Our first major purchase together was a pair of kayaks to launch from the numerous natural entry points in our neighborhood. This river in all its natural glory is our home.

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 proposed plan is *DETRIMENTAL* to the natural habitat

- Trees create an important buffer zone, reducing the amount of run-off (which often carries sediment and pollutants) that enters our river directly during periods of heavy rain. Tree roots stabilise river banks and can reduce the rate of bank erosion. Therefore, clear-cutting our river banks is a terrible plan.

- the beauty of our river is a significant source of appeal in Sacramento, stimulating our economy through housing investments (and the businesses supported by those residents) and recreational events (and the businesses relevant to those recreational activities)

Instead of the proposed demolition of our natural river banks, I request the US Army Corps of Engineers share greater detail about the work plan, not proceed until alternative solutions are explored extensively, and only move forward with the most environmentally responsible solution.

As homeowners, flooding is a concern here and one we are willing to invest in mitigating. However, the preservation of what I consider to be our most valuable natural resource is far more important. On behalf of my son and our future generations, I ask that you work to find a less destructive solution.

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.

Catherine Harris

(Sacramento resident and registered voter, born and raised in Sacramento, California)

February 20, 2024

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 Department of Water Resources (DWR),

I am writing to provide my comments on the lower American River components of the draft SEIS/SEIR, with a specific focus on Contracts 3B, 4A, and 4B.

The areas impacted by these contracts are immensely important for me. I have lived in Sacramento within a mile of the Waterton Way River Access since 1999. That mile-long stretch of riparian woodland is probably the only reason I have stayed in Sacramento all that time. I have jogged along the pathways at least once a week and taken daily walks with two beloved dogs. Over that time, I have encountered deer, turkey, coyotes, beaver, otter, turtles, hawks, bald eagles, and numerous other wildlife. I have also encountered thousands of people enjoying themselves hiking, biking, fishing, swimming, kayaking, and birdwatching. My access to that stretch of river kept me healthy and sane through two divorces, the deaths of my parents and several good friends, and the COVID epidemic. Until I learned of the planned levee work a month ago, I looked forward to retiring here in a few years. If the levee modifications are carried out as planned in the draft SEIS/SEIR, I will move.

1 | I am deeply concerned that the proposed project threatens the unique recreational and
2 | ecological values of the American River Parkway, including its rare riparian habitat and wildlife
3 | corridor. The destruction of mature trees and vegetation, along with the long-term impacts on
4 | recreational activities, is inconsistent with the area's designation as a Wild and Scenic River. I fail
to see sufficient justification for proposed methods to address potential streambank erosion
concerns outlined in the draft SEIS/SEIR, which I believe would cause significant and
unnecessary harm to the natural and cultural environment without commensurate benefits to
flood safety. Also, I am concerned about the potential health and environmental impacts
associated with the proposed construction activities. The use of quarry rock, potential asbestos-
containing composition, and air quality concerns related to diesel trucks raise serious red flags
that must be addressed.

I apply my own technical expertise in concentrating on my remaining comments on the cultural resource impacts of the planned project. I have been an archaeologist since 1980 and a faculty member at Sacramento State since 1999. I have worked on projects caused by USACE undertakings many times in other states and consulted with the USACE in my capacity as Chair of the Department of Anthropology between 2006 and 2009. Based on this experience, I agree with the assessment in the EIS Cultural Resources Appendix that there is a high probability of undiscovered, buried archaeological sites that are eligible for inclusion onto the National Register of Historic Places in the areas of potential effect (p.2). The Programmatic agreement promises a framework for dealing with discovery, evaluation, and mitigation of such properties,

5 but other than provisions for the standard Section 106 procedure that reacts to unforeseen discoveries made by monitoring construction activities, I see little evidence that the USACE has adequately considered alternatives that would avoid eligible sites or made contingency plans if such sites are discovered.

6 The USACE has ample recent and local experience in the necessity of taking these factors into account. In the Feather River levee repair project north of Yuba City (2014/2015), the discovery of archaeological sites containing human burials extended the construction schedule for a year and increased project costs by at least \$5 million. Moreover, the work caused a dispute between the USACE and the United Auburn Indian Tribe over the legal disposition of human and cultural remains caused by inconsistencies in the way federal and state law apply to non-federal lands. In a Capitol Public Radio report (<https://www.capradio.org/articles/2015/07/01/levee-repair-work-resumes/>), Congressman Doug LaMalfa is quoted as saying “had better surveying been done, they could have avoided some of the places where farther down the levee they were running right through the middle of things. So better consultation would have saved a lot of this delay and additional cost.” Reporter Bob Moffitt further stated that the USACE said it would “perform minor excavations on future levee sites to ensure there are no Native American artifacts present.” I see no evidence that the USACE has made any such effort to discover, avoid or minimize adverse effects to such properties, or that it has planned for the impact that discovery would have on the budget and timeline for the project.

7 I also note with concern that the programmatic agreement asserts that “the Native American Graves Protection and Repatriation Act (NAGPRA) does not apply because there are no federally owned or administered properties within the APE” (p12). It also states that the Corps will not curate any cultural materials subject to NAGPRA. Further, the Central Valley Flood Protection Board (CVFPB) and landowner *shall* ensure that Native American human remains and funerary remains located on state or private land be treated in compliance with state cultural resource laws (p.13). I find this misleading at best, and USACE clearly intends to dump the costs and responsibility for curation and repatriation on state and local government, and on landowners.

While I was chair of the Department of Anthropology at Sac State, I tried aggressively to bring our legacy collections (acquired before the passage of NAGPRA in 1990) into compliance with state and federal law by seeking funding to pay for the inventory and consultation efforts required by those laws. Some of those collections were acquired by Sacramento State field schools in response to USACE undertakings on state and private land in central California, and the resources necessary to deal with these collections were simply never allocated. To this day, the USACE adamantly refuses to take any responsibility for these collections and has been happy for Sacramento State to shoulder the entire burden and take the blame with the recent passage of CalNAGPRA: AB 389. The CVFPB and landowners should be fully aware then that USACE will leave them the responsibility and expense for dealing with any cultural remains encountered during this project.

This is no simple matter. According to federal law, any human remains, and associated materials must be properly curated in a facility that meets federal requirements until they are repatriated,

while any remaining artifacts must be curated in perpetuity. Finding a facility to curate those materials during the process may be difficult; for example, the CSU campuses in San Francisco, San Jose, Sonoma, and Chico are closing their repositories to any new collections that are subject to NAGPRA and CalNAGPRA because of AB389; Sacramento State may follow soon. Repatriation is not easy because Native American tribes often disagree as to what qualifies under NAGPRA and CalNAGPRA, as well as to whom the remains should be repatriated. These consultations can be contentious and prolonged. Even if no human remains are encountered, many tribes and the Native American Heritage Commission argue that both animal bone and soils associated with archaeological materials qualify under CalNAGPRA. This means that any significant prehistoric archaeological site affected by this levee project will trigger CalNAGPRA and leave CVFPB and private landowners responsible for curating and repatriating cultural materials.

I therefore urge the US Army Corps of Engineers to conduct a more thorough environmental analysis of the proposed project and its subcomponents. Specifically, I request a more targeted and less destructive approach to Erosion Control Projects 3B and 4. The current draft does not adequately address the significant impacts nor provide sufficient mitigation measures. Under the California Environmental Quality Act (CEQA), it is imperative to explore all feasible alternatives to mitigate impacts. The draft SEIS/SEIR falls short in this regard, failing to present alternative methods that could minimize environmental damage. Clearly the SEIS/SEIR would benefit by consideration of alternatives that minimize soil disturbance, identify and avoid potentially NRHP eligible archaeological sites before construction begins, and fairly share the costs and responsibility for curating and repatriating cultural materials. The USACE should do due diligence in and plan for best practices concerning cultural properties and collections.

Considering these concerns, I strongly oppose the current approach outlined in Contracts 3B, 4A, and 4B. I urge the US Army Corps of Engineers and the Department of Water Resources to reconsider the proposed actions and pursue more environmentally responsible alternatives that prioritize the preservation of the American River Parkway's natural integrity and recreational value.

Thank you for considering my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Zeanah", with a stylized flourish at the end.

David W. Zeanah

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 8:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Draft Supplemental Impact Report (SEIS/SEIR) December 2023 report and Appendices

From: Catherine Vigran <cvigran@gmail.com>
Sent: Tuesday, February 20, 2024 8:15 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/Draft Supplemental 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. As a neighbor of the parkway my husband and I ride our bicycles on the Parkway daily, appreciating the trees, the varied wildlife and the river itself.. It's impossible to overstate what a precious resource this represents to all of us here in Sacramento.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

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.

Catherine I. Vigran

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:59 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: CHRISTOPHER WRIGHT <wrightcraig55@icloud.com>
Sent: Tuesday, February 20, 2024 7:54 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me

[YOU CAN CUSTOMIZE HERE WITH YOUR PERSONAL CONNECTION WITH THE PARKWAY AND THE WILD AND SCENIC AMERICAN RIVER].

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.
Craig Wright

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:58 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – De...

From: Eric Ross <odonata23@gmail.com>
Sent: Tuesday, February 20, 2024 7:46 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 202...

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

Our comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A The American River Parkway and its woods and wildlife are extremely valuable to us. We have lived in Sacramento for almost 42 years. We decided to come here so we could raise children. We and our children have enjoyed the beauty of the American River and the flora and fauna that surround it along with the marine mammals, birds, and fish that thrive in it. The Parkway is an indispensable natural resource whose value cannot be underestimated for Sacramento Region inhabitants and the annual visitors that utilize it.

The American River and its surrounding wilderness do more than just supply a place to recreate and relax; it is part of our local identity and something Sacramentans always speak about with civic enthusiasm. It hosts boating,

birding, fishing, bicycling, picnicking, among other ventures that thousands of us enjoy throughout the seasons. It is a place to get away, to get involved, to get refreshed, and to get back to nature surrounded by an urban area. It is not something to treat callously or lightly when changes may be needed.

After my career locally as a lawyer and judge, I have devoted my retirement to giving back. Through the American River Parkway Foundation (ARPF), I am a Mile Steward for ARPF, leading other Parkway Stewards at my church to conduct monthly cleanups of the American River along a mile of the river close to California State University at Sacramento (CSUS) with thirty-plus organized groups that have been assigned their own mile to clean up through ARPF. I have done that work for many years now. We are familiar with our mile like it was our backyard and we want its beauty to be maintained.

In the last two years or so, I and others in my group have paid attention to the work that USACE has done along the shores of the river at CSUS and on the edge of the Campus Commons Golf Course. At first, I was dismayed by the sweeping removal of the bushes, trees, and ground cover at that location, but I assumed in time that action would be solved by the planting of appropriate vegetation and trees as remedial mitigation.

I have seen what a rush to be efficient has done. It has made the sides of the river look like they are a processed culvert devoid of life, produced for function, but without any concern for nature or aesthetics. Is this the best you can do? Asked another way, if your home bordered on a river would you like what you have done to be your backyard? Of course, you would not. So why do you think it is appropriate for Sacramento?

Another of my activities in retirement is to be involved with the American River Natural History Association (ARNHA) which maintains the Effie Yeaw Nature Center (EYNC) up river from where your proposed work is to be done on the lower American River (draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B). I serve on the ARNHA Board of Directors. We have an agreement with Sacramento County to run EYNC on 100 acres of County wilderness property along the American River in Carmichael. EYNC

has

been in operation for close to half a century.

Our highly trained staff and numerous committed volunteers annually provide over

17,000 elementary school children with outdoor nature education, including informative

talks and interpretative hikes through the forest and along the river. These kids develop lasting memories of what a wild and scenic river looks like when they spend time there.

Do you plan to replicate your work at CSUS again from Howe Avenue bridge moving East past the Watt Avenue bridge and further destroy our beautiful riparian banks along the river without any regard for nature or aesthetics? We hope your unnecessary bank erosion project can be radically modified to allow for reasonable minds to meet and figure out a way to maintain the Parkway thoughtfully and with a sense of keeping the legacy of its wildness and beauty for those kids and future generations.

We do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, we do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

We are writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

We do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse

impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s

risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the Incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, we believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many

more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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.

We strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

We object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981).

In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

We 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.

We object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Eric Ross and Karen Tarp

Sent from [Mail](#) for Windows

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:57 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF)

From: Janet Shipp <shippkjaa@gmail.com>
Sent: Tuesday, February 20, 2024 7:43 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF)

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources,

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly contracts 3B, 4A and 4B.

I have concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

A

One of the reasons I loved about buying my home was that I could enjoy nice walks by the river with the beautiful trees. It saddens me that they will soon be gone, especially when there are other ways to do this that can be addressed.

It doesn't seem like this work is necessary along this section of the American River and I do not support the devastating methods being proposed to address potential bank erosion concerns.

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.

My specific concerns and comments include the following:

B

Limited evidence for unnecessary removal of trees and vegetation

Erosion is minimal in USACE's Contract 3B

Impact on wildlife and critical habitats

Recreational access

The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its sub components and should not go forward with the subcomponents of Contracts 3B and 4, until a much more targeted and less destructive alternative approach to Erosion Control Projects 3B and 4 is presented.

These proposed decisions affect this irreplaceable treasure for generations to come.

Thank you,

Janet Shipp

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:56 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: watermana3@gmail.com <watermana3@gmail.com>
Sent: Tuesday, February 20, 2024 7:37 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):

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I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

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The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting

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Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

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I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomp onents 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.

Aaron Aldred

Sent from my MetroPCS 4G LTE Android device

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:56 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Shay Haddow <shayhaddow@gmail.com>

Sent: Tuesday, February 20, 2024 7:36 PM

To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>

Cc: PublicCommentARCF16@water.ca.gov

Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me for both my physical and mental health as well as my connection to Sacramento.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§

21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

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Thank you.

Shay Haddow

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:55 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: CHRISTOPHER WRIGHT <wrightcraig55@icloud.com>
Sent: Tuesday, February 20, 2024 7:36 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

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Thank you.
Craig m. Wright

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:54 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Marie Bastien <sacliving06@aol.com>
Sent: Tuesday, February 20, 2024 7:32 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR): My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

I live on Rio Bravo I see on a daily basis season after season the animals that rely on the trees the animals that would be pushed where?? The protection the younger animals need we see the beauty that hundreds of people enjoy over just 1 weekend . the teams running / bike riding getting the shade from near & far schools the kids laughing on a family outings boating old & young this shade is important this is devastating for sooooo many !!!!

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River. I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project. Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage. The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large

earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts. Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR. Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided. The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone. Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data. Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area

under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms). Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need. I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too? I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B. I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil. The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River. The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis. The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement. If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated. This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate

the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected. The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves. Thank you. Marie & Epi Husband Perez

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:52 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Deborah Harrington <harrington.deborah.8@gmail.com>
Sent: Tuesday, February 20, 2024 7:30 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

I often take my children to the dirt trails that run through this area. My son has learned about nature, wildlife, bugs, native plants and more here. He has found a place of peace here and a way to enjoy the great outdoors while living in Sacramento. I don't even know how to explain to a 3 year old how people can deem destroying these woods and wildlife "a good idea". He and I would be truly devastated.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are "necessary" for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed "unavoidable" impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

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Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other

reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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Thank you.

Deborah Snell

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:52 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Project

From: Sandy <smacdonald_hopp@yahoo.com>
Sent: Tuesday, February 20, 2024 7:28 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Project

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The American River Parkway and its woods and wildlife are extremely valuable to me.

As a homeowner who regularly enjoys walking the river parkway and kayaking the river, I can't imagine losing all the trees, birds & wildlife that are so easily accessible.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are "necessary" for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

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hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal,

overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior

contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the

most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these

locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Sandy MacDonald-Hopp

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:51 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Leslie Blaney <leslie.blaney2@gmail.com>
Sent: Tuesday, February 20, 2024 7:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

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 our community.

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:

5. A hundred trucks per day adds damage to roads and levees. Is there budget for improving the levees and damaged roads?
6. Staging equipment in the parkway where adults exercise, elementary schools visit, families play, and recreational events requires mitigation and hardship on other areas of the parkway.
7. What is the asbestos amount contained in the jagged quarry rock? What is the associated dust that is spread due to bringing in the rock to family homes, local schools, construction worker, and individuals on the trail.
8. A hundred trucks daily create toxic air pollution from the diesel fuel. 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).
9. With Global Warming and NetZero 2050, has anyone estimated the loss of trees absorbing carbon dioxide and producing oxygen. AI technical estimates, with 500 oak trees at 50 years of age could absorb approximately 600tons of CO2 per year and produce 858 tons of oxygen. (This is an estimate. US Forest Service estimates an average CO2 absorption per oak tree per year is 48lb, and per photosynthesis equation, O2 produced per pound of CO2 absorbed is 1.43lb). Trees and vegetation along the river are a valuable way to mitigate climate change.
 - a. Global deforestation: This project adds to the global deforestation which significantly impacts CO2 absorption and contributing to climate change. The World Resources Institute: <https://www.wri.org/>
 - b. Net Zero 2050 goals: Achieving NetZero requires not only protecting existing trees but also planting many more to offset carbon emissions. California Air Resources Board (AARB) <https://ww2.arb.ca.gov/>
 - c. The above example of CO2 absorption and O2 produce is a rough example. Was the number and species of trees being removed determined and did we look at the carbon sequestration and oxygen production?
 - d. Have alternatives been explored such as target intervention or selective thinning to get to the banks?
10. The area along the river that was recently denuded is showing signs of erosion due to the rains. How will this area be mitigated? Seemingly new vegetation will take years to grow. What happens to the banks if the river levels swells, and the denuded banks are washed away?
11. Was there any consideration for the bird life and other wildlife? We are talking about eleven (11) miles of clearcutting damaged habitat for many years.

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The 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,

Leslie Blaney

NOTICE TO RECIPIENT: If you are not the intended recipient of this e-mail, you are prohibited from sharing, copying, or otherwise using or disclosing its contents. If you have received this e-mail in error, please notify the sender immediately by reply e-mail and permanently delete this e-mail and any attachments without reading, forwarding or saving them. Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 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

-----Original Message-----

From: Terry Porath <terrbear1212@gmail.com>

Sent: Tuesday, February 20, 2024 6:49 PM

To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>

Cc: PublicCommentARCF16@water.ca.gov

Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

I live in River Park and have been a resident here my whole life. I go down to the River almost everyday because my backyard backs up to the levee. Seeing the destruction to the landscape and wildlife makes me extremely devastated.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§

21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you for your time,
Terencio K. Porath, River Park resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:49 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Please don't ruin the river

-----Original Message-----

From: G R <drlovelyone@hotmail.com>
Sent: Tuesday, February 20, 2024 6:47 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Please don't ruin the river

1 | Please do not remove the vegetation anymore on the American River. The work at the university bridge looks terrible. It ruins the natural beauty of the river. Birds, turtle, coyotes and deer will be displaced and it will ruin animal habitat.

Gina Rosito
Sacramento county resident

Lee Kane
Sacramento county resident.

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:48 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Don't Bulldoze the Parkway

From: Rachel Gregg <ms.gregarious@gmail.com>
Sent: Tuesday, February 20, 2024 6:26 PM
To: PublicCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: SupervisorSerna@saccounty.net; SorgenKC@saccounty.gov; BellasE@saccounty.net
Subject: [Non-DoD Source] Don't Bulldoze the Parkway

Greetings All,

A | I'm writing today to ask you to help protect the American River Parkway from ill-advised "flood control" work by the Army Corp of Engineers.

Many aspects of the Contract 3B proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the "brute force" bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails.

Respectfully,

Rachel Gregg

Sacramento, CA

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:47 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: Virginia Volk-Anderson <vanderv@surewest.net>
Sent: Tuesday, February 20, 2024 6:25 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Subject:

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.

In the 40 plus years I have lived in Sacramento, the American River Parkway has provided opportunities to bike, walk, relax in nature and- most importantly - introduce groups of children to the natural world through Sierra Club's Inspiring Connections Outdoors program. It is truly The jewel of Sacramento County and should be preserved in its natural state.

I strongly question whether this "potential bank erosion" work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed "unavoidable" impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

My specific concerns and comments include the following:

B

- 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.
 - Massive damage will be done to the American River Parkway and wildlife habitat.
 - More destruction will occur with this project than occurred with the actual levee upgrades completed over the last decade.
 - This new project would bring the total damaged area of the wildlife corridor to 11 miles out of the 26 miles of parkway below Nimbus Dam.
 - Despite the American River being a national and state Wild and Scenic River and portions designated Virginia Volk-Anderson as a “Protected Area” in the American River Parkway Plan, the USACE plans to move forward with the project unless the public can convince them to consider less damaging options.

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.

Virginia Volk-Anderson, 1408 La Sierra Drive, Sacramento, CA 95864

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:47 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Community Member Comments: American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Laura Hansen <laura@chillsacramento.org>
Sent: Tuesday, February 20, 2024 5:12 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Community Member Comments: American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A Tress and vegetation help reduce erosion. Bare dirt with no plant life accelerates erosion. This is proven. Regardless of the other reasons the USACE is proposing destroying protected riparian habitat, you know what you propose is wrong for the community. Wrong for the wildlife habitat and wrong for the perceived erosion problem you are trying to solve.

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 targeting and less destructive alternative approach to Erosion Control Projects 3B and 4 proposes.

The American River Parkway is often called the “Crown Jewel of Sacramento”. This project would help destroy it.

Thank you.



Laura Hansen

She/Her/Hers

Board President

Chill Sacramento

916-247-5871 (cell)

laura@chillsacramento.org

www.ChillSacramento.org

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:45 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments re American River Common Features (ARCF) 2016 Draft SEIR/SEIS - December 2023 Report and Appendices
Attachments: Looking West from Guy West Bridge.jpg; Looking East from Guy West Bridge.jpg

From: Michael Frayne <mkfrayne@gmail.com>
Sent: Tuesday, February 20, 2024 4:54 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments re American River Common Features (ARCF) 2016 Draft SEIR/SEIS - December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and CA Dept. of Water Resources (DWR):

My comments address the Lower American River components of the draft SEIR/SEIS, particularly Contract 3B.

A By way of background, I am a retired attorney. I have lived in the East Sacramento neighborhood with my family for over 40 years. I jog on the American River Bike Trail 3-4 times a week, usually from Mile 8 just east of the Guy West bridge, to Mile 10.5 beyond the Watt Ave overpass. I am very familiar with the river along this path. It is a beloved and well used space, with runners, walkers, hikers, bicyclists, students, artists, photographers, birders, and others of all types and ages enjoying this precious natural resource. Contract 3B directly affects this stretch of the river.

The future of this stretch of the American River as envisioned in the ARCF 2016 draft SEIR/SEIS December 2023 report is ghastly. The lush riparian habitat will be denuded by fleets of heavy, diesel-belching construction machines. All trees, vegetation, birds, animals, insects will be eliminated, leaving nothing but a desert-like expanse of fabric-covered riverbank (see, e.g., photos 1 & 2).

My reading of the SEIR/SEIS suggests the Contract 3B area will look much like the recently "erosion controlled" section of river from the H Street bridge to the Howe Ave overpass: a wasteland (see again photos 1 & 2). During the construction that clear-cut and denuded the H Street bridge to Howe Ave overpass section of the river, I was shocked. No apparent regard for the wildlife that was displaced: an entire colony of California quail, red-shouldered hawks, woodpeckers, jays and swallows, spotted towhees and robins, yellow-billed magpies and western bluebirds. Turtles living beneath the Guy West bridge, gone. No more deer or rabbits or coyotes. All replaced by a river bank rendered hideous in the name of erosion control.

There has to be a better way for Contracts 3B and 4. The 2008 American River Parkway Plan advises "Flood control projects, including levee protection projects and vegetation removal for flood control purposes, shall be designed to avoid or minimize adverse impacts on the Parkway, including impacts to wildlife and wildlife corridors." (ARPP 2008, s 4.9, p 20)

I cannot believe, as asserted in the SEIR/SEIS, that "No feasible mitigation measures are available to avoid or reduce this considerable contribution such that it is a significant and unavoidable cumulative impact." (SEIR/SEIS 5.1.7 page 5-20). Indeed, the Army Corps of Engineers - lead agency for this project - is an acknowledged leader in bringing a more nuanced and nature-sensitive approach to projects like this under the "Engineering With Nature" program.

Accordingly, I request and strongly urge the US Army Corp of Engineers perform a more enlightened environmental analysis of the significant impacts of this project, and not go forward with Contracts 3B and 4 until a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met this requirement. The analysis of alternative methods for a much more targeted and less destructive approach consistent with 'Engineering With Nature' principles and Federal 'Nature-Based Solutions' guidance is not presented. Such alternative methods would result in far less environmental damage. Surely there is an effective alternative that does not involve clear cutting the entire riparian landscape.

B My understanding is that, based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. This calls into question whether the environmental impacts can be deemed "significant unavoidable" when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

C Contract 3B extends east from Howe Ave, to the Mayhew Drain. The current plan is to bulldoze over 500 trees for "potential bank erosion" protection. It appears the 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. The SEIR/SEIS should offer substantial support for the claim that this extension and the proposed riverbank "erosion" control methods are needed for flood safety in this zone. The current SEIR/SEIS does not.

Please take a step back and incorporate an alternative that embraces a TARGETED and LESS DESTRUCTIVE approach to erosion control.

Thank you for your thoughtful consideration.

ATTACHED:

Photo 1 - American River looking west from Guy West Bridge

Photo 2 - American River looking east from Guy West Bridge

Michael Frayne

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:46 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Bulldozing project

From: mark herman <markaherman916@gmail.com>
Sent: Tuesday, February 20, 2024 5:09 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Bulldozing project

1 | I'm 100% opposed to the proposed project near Watt Ave. The appeasement is not necessary, is destructive and takes away beautiful park and wildlife

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 7:44 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Kim Karen McKean <kimckean2@gmail.com>
Sent: Tuesday, February 20, 2024 4:29 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

My parents purchased my home on Tuolumne Drive in January 1968, when I was 19, thus I have enjoyed this section of the American River Parkway off and on for 56 years. I am aware of the many species of fowl and wildlife that count on the banks of the river for their survival. I have always taken joy in the fact that my Parent's house was so close to the river, for walking along the river gives one a feeling that they are out in the country, not in the middle of suburbia. I value trees and there part in preserving the planet.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are "necessary" for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the

Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Karen I McKean

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 4:28 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] comments regarding American River Common Feature, 2016 draft supplemental EIR - December 2023 Report and aPPENDIX

From: Ray Tretheway <ray8733@swisscows.email>
Sent: Tuesday, February 20, 2024 4:26 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] comments regarding American River Common Feature, 2016 draft supplemental EIR - December 2023 Report and aPPENDIX

1 TO Whom it May Concern - I do not support the current bank erosion control project as proposed. I believe the USACE
2 was mandated by Congress to prepare a Levee Vegetation Management Plan, Guidelines and Annual prior to any
removal of healthy, low risk trees on or at the toe of our nation's levees. Furthermore, I believe the environmental
analysis fails to either address the full ecological and fisheries impact of the current proposed project, nor does the
proposed mitigation adequately or fully address alternative methods of mitigation that would retain the integrity of the
existing levee vegetation ecosystem.

The American River Parkway and its environs deserve flood and erosion control protection and management that merits its uniqueness and stature as the "Crown Jewel of Sacramento".

Ray

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 4:16 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Public 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: Belinda May <belinda_may@yahoo.com>
Sent: Tuesday, February 20, 2024 4:12 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Public 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.

- A | I share some concerns about the proposed project and the draft SEIS/SEIR environmental analysis.
- | The American River Parkway is extremely valuable to many California residents and parkway visitors.

I question whether the “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 likely to put the banks at risk in high water flows compared to 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 sufficiently mitigated, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much less devastating scale than described in 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 approach (with less environmental impacts) is not presented.

Specific concerns and comments include the following:

The US Army Corps 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. Instead, a much more targeted and less destructive alternative approach to Erosion Control Projects 3B and 4 should be presented.

B The proposed projects will affect the scenic beauty, wildlife habitats, and viability of existing riparian ecosystems that currently thrive in the impacted areas. Such decisions would impact the American River Parkway for generations to come and should reflect the care that this valuable resource deserves.

I also concur with the information attached below, provided by the Amercian River Parkway Foundation.

Thank you for your consideration.

- Belinda May, Sacramento County resident

List of Key Concerns

C

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 (OEHHA), and OEHHA 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 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 environmental analysis.

List of Our Requests

We need more information. Incredibly, the graphic below is the most detailed depiction of the work to be done in the area in the over 1,600 pages of the SEIS/SEIR. The public cannot possibly understand, let alone intelligently comment, on the work to be done and how it affects resources they care about like forests, beaches, swimming spots, footpaths, general ecology, etc. without more detail from the Corps than a single pixelated map zoomed out much too far. The importance of this area to the public and the ecology of the river merits MUCH more detail from the Corps about the work being proposed.

1. Demand Spot-by-Spot Evaluation:

- Insist on a thorough demonstration of the spot-by-spot need and benefit analysis.
- Encourage the evaluation of alternative methods that are targeted and less destructive to habitat and wildlife.

2. Highlight Unjustified Damage:

- Draw attention to the unjustified massive damage proposed for a straight stretch of the river.
- Reference modeling data showing low bank velocities in this specific area.

3. Advocate for Environmentally Friendly Approaches:

- Promote the consideration of "spot fixes," small equipment, and maintenance.
- Support the use of stabilizing vegetation, aligning with the National Park Service's recommendation.

4. Insist on Balanced Solutions:

- Emphasize the importance of finding ways to achieve both tree preservation and any erosion work (if needed) for flood protection.
- Encourage a balanced approach that addresses environmental concerns.

5. Demand Greater Detail about Work to be Done

- The current environmental documentation does not show in adequate detail what specific work will be done.

6. Insist on a Peer Review

7. Do not proceed with subcomponents until justification and alternatives are provided.

- The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and 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.

8. Lasting care of Sacramento's Crown Jewel:

- 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.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 4:08 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Jessica Bennick Shevlin <jessicashevlin@gmail.com>
Sent: Tuesday, February 20, 2024 3:57 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

A The American River Parkway is extremely valuable to me. The River Park Paradise Beach and Sac State Howe Avenue access areas have already been ruined by another phase of the levee improvement project, and it will take decades for that area to be renewed to its former beauty and wildlife habitat. I was devastated to see how Paradise Beach was raped of its beauty. The American River area access at Larchmont has become my new walking, flower photographing, and wildlife watching area since the River Park/Sac State project started, and it will be devastating to lose another large swath of trees and plants. **PLEASE DO NOT DO THIS!**

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.

Jessica Shevlin
Lifelong resident of Sacramento, CA

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 3:22 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] AMERICAN RIVER Tree Removal Project

From: Gary Agid <gary@agid.com>
Sent: Tuesday, February 20, 2024 3:14 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] AMERICAN RIVER Tree Removal Project

1 | The American River Parkway is extremely valuable to me. Please do NOT
remove the trees as proposed!

Gary

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 3:12 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comment of proposed Lower American River erosion control

From: Betsy Reifsnider <betsyreif@icloud.com>
Sent: Tuesday, February 20, 2024 2:59 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comment of proposed Lower American River erosion control

Dear Members of the U.S. Army Corps of Engineers,

I am deeply concerned about the proposed erosion protection measures envisioned by the Army Corps.

1 | The Lower American River is a federally designated Wild and Scenic River and should be managed and cared for as such.

Specifically, I am troubled by the following:

- 2 | • Rip rapping the shoreline that will hamper the growth of natural vegetation and prevent people from gaining access to the river;
- 3 | • Removal of trees and vegetation that could act as natural buffers to slow down flood flows and prevent flooding;
- 4 | • Impacts to wildlife and fish species such as salmon, steelhead, and sturgeon, as well as harming local and migratory bird populations;
- 5 | • Impacts on people's ability, especially that of families, to recreate at little or no cost along the river;
- 6 | • The effects rip rapping and vegetation removal will have on indigenous people's cultural heritage and tribal ceremonies.

The Army Corps must conduct a more detailed analysis and provide alternatives.

These include:

- Undertaking a spot-by-spot need and benefit analysis, as well as prioritizing spot fixes and the use small equipment and maintenance;
- Promoting stabilizing vegetation, as recommended by the National Park Service;
-

The bottom line is this. The Army Corps must provide more detailed environmental analysis of the impacts of this proposed project and its subcomponents and what the alternatives are. To do less would do a disservice to the American River and to everyone who uses this remarkable resource.

Thank you for your consideration.

Sincerely,

Betsy Reifsnider

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 3:10 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

-----Original Message-----

From: teresa west <westhere@sbcglobal.net>
Sent: Tuesday, February 20, 2024 2:49 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me. I treasure the times I spend walking and kayaking along the river, and delight in seeing the wildlife.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for

a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms)..

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not "less than significant" nor are they "mitigated to less than significant". When there are "significant unavoidable" impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the "Crown Jewel of Sacramento". In 2012 it was designated a "Regional Treasure". The Contract 3B actions move into a zone designated a "Protected Area" under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Teresa West

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 3:08 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Contract C3B will result in loss of natural vegetative armoring and unmitigated loss of heritage oaks and riparian habitat, please suspend or redesign bank protection elements of C3B.

From: Avery, William E <averyw@csus.edu>
Sent: Tuesday, February 20, 2024 2:25 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Bellas. Liz <bellase@saccounty.gov>; Sorgen. KC <sorgenkc@saccounty.gov>
Subject: [Non-DoD Source] Contract C3B will result in loss of natural vegetative armoring and unmitigated loss of heritage oaks and riparian habitat, please suspend or redesign bank protection elements of C3B.

Contract C3B will result in loss of natural vegetative armoring and unmitigated loss of heritage oaks and riparian habitat, please suspend or redesign bank protection elements of C3B.

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

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 and the north side of the river from the Howe Ave bridge through the Kadema Nisenan tribal historic site on up toward the Watt Ave bridge. This riparian habitat has 200 year old soil, mature, wooded habitat, with dense trees, and is part of an interconnected and vital wildlife corridor that supports both wildlife and the wilderness quality experience that makes the Parkway so unique.

Existing precious vegetative armoring is sufficient for predicted flows.

1 This is an area with well-established, self-renewing vegetative armoring provided by the existing root network and is 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 than 8 ft per sec. Lower still when the Folsom Dam Raise project is completed in three years and the Operations Manual defines a 200 year flood event as a release of only 115,000 cfs! These updated flows and hydrological models need to be considered by USACE in their bank stability 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.”

2 Further, C3B proposes to dig trenches filled with quaried rocks, lay in rock revetment on the cleared banks and cover this treatment with subsoil 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 relatively barren 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. In fact in the areas of Contract 1 and Contract 2 we are already seeing erosional failure of the planting benches where no failure was previously occurring when the original vegetation had been intact.

Natural riparian habitat and heritage oaks not replaced by proposed mitigation.

3 Further, native riparian woodland habitat is not likely to reestablish itself when grown in lifeless, compacted subsoil filled in 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. The scientific literature is fairly replete with examples of how slow environmental restoration areas are to recover and these are restoration efforts that are not being attempted by planting in sterile lifeless and compacted subsoil layered over riprap (see for example: 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).

4 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.

5 Though there are offsite 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, which is rich in those species, is not being mitigated at all.

In summary what contract 3B proposes is destroying the riparian forest corridor, destroying the erosion protection of vegetative armoring and the unmitigatable loss of heritage oaks and other valuable riparian species 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.

Suspend or redesign bank protection elements of C3B.

6 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. We also ask that the north bank erosion protection projects upstream of Howe Ave Bridge, the historic Kadema Nisenan area, also be removed from Contract 3B. If after updating their hydrological modeling to include the positive contribution of vegetation, and realistically considering 200 year flows expected after the Folsom Dam Raise is completed, 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 where existing riparian habitat is largely protected and left intact.

Thank you,

William E Avery. PhD
Professor Emeritus, Biological Sciences, CSUS
Concerned Local Resident
Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 3:03 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] American River Parkway 'project'....
Attachments: Parkway Official Letter from SL copy.pages

From: seviml@aol.com <seviml@aol.com>
Sent: Tuesday, February 20, 2024 2:05 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Parkway 'project'....

Sevim Larsen

SEVIML@aol.com

To: Whom It DOES Concern
From: Sevim Larsen
Date: February 2024
Re: Proposal of Project along The American River Parkway East of Watt

I have lived in my home, which backs up to the American River Parkway near the Estates Dr. Access Gate, since 1979. I cherish its location and we chose this particular home because of its proximity to the Parkway. Walks along the Parkway have provided 'healing' through the years. We thrilled to the marvels of the trees bursting out in blossoms in the Spring & the brilliant falling leaves of Fall. Ah, the changing of seasons! The Parkway provides health benefits to those of us facing aging, some in wheel chairs, as well as those training for Marathon & Iron Man Competitions. It's the perfect place for 'movement' along with quiet contemplation to appreciate life's gifts as well as challenges, uninterrupted by motor traffic and the rush of city life. Hundreds of people use the Parkway behind my home daily, not just the joggers but those walking their dogs & pushing strollers. The Jesuit and Rio Americano Track Teams use the Parkway to run/practice daily. It's a case of 'One Size Fits All'!

I feel certain it would be found that there is less obesity, crime and depression/mental illness in communities where populations have access to nearby natural recreation areas.

- 1 Some years ago there was a large project to strengthen the levy behind my home. It included small and heavy equipment working adjacent to my property. Their vibrations caused cracks in my ceilings and around my cabinets. And the diesel fumes (from early morning until late in the day) were ever present in my home despite dual pane windows. At times I felt that the vibrations of the equipment working on the project would shake my home off its foundation. Damage was done and I put in a claim.... And when I asked one of the Supervisors to please come to see the damage, one of his pieces of construction equipment went by and my whole house shook. He was frightened that we were having a significant earthquake. He was shocked when I said that this type of 'movement' typically went on all day, every day. I recently called my insurance company regarding coverage should there be damage from the proposed project. Their answer was that they could not answer my questions until I filed a claim (hopefully unnecessary). So, I will take dozens of photos 'before' and then see what the 'after' will be. My contractor will be crawling under the house to take photos of
- 2

the foundation and joists before the project begins and again afterward. You really do need to be cognizant of potential damage and try to mitigate where heavy equipment is operated, minimizing the time and types of vibrations that do the most damage.

- 3 | I would presume that MAX flood control measures have been completed UP River to lessen water flows before they reach us?? It should be noted that the huge inundations of February 1998 (I think that was the year) brought raging waters to the top of the levy behind my home... but they did not breach it! And it s also should be noted that we navigated our neighborhood in rafts and canoes due to water rising up to our front doors. However, the water did not come from the river, it came from insufficient storm sewers that could not handle that amount of water. We were in more danger from runoff from the concrete streets and driveways than from the river which had natural disrupters such as trees to slow down the waters and hold the soil. Subsequent work has been done to support the levies, provide spillways etc to lessen the danger of storm waters reaching the populated areas near Estates Drive and Watt Avenue. Perhaps, unless the storm sewers are updated to handle flow, funds would be better spent to protect our properties by addressing the storm sewers before the river areas. And the 'hard scape' back yard being proposed by this project will only exacerbate the dangers of faster moving water rather than it being slowed down by the natural habitat....and the ability of the porous river soil to absorb water. All of this should be taken into account before a project such as this is approved.
- 4 |
- 5 |
- 6 | As a side note, those of us on Crondall hear much more Hwy 50 traffic noise since it was widened years ago and is now being widened further to handle increased traffic from development upstream....which equals more concrete, more air and noise pollution & more water runoff.
- 7 | Projects such as the one proposed for our neighborhood will not only provide an unhealthy environment for those of us with heart or other health issues but have a major impact on the health and life expectancies of children as well. The quality of the air & stability of soil provided by trees will be lost if dozens or hundreds of trees are destroyed. And please note that trees provide natural arbors for shade/cooling in an area which continues to experience record heat in the summer. Hardscape will reflect more heat and lead to more warming in the area. And of course the natural habitats of our beloved 'animal neighbors' will be lost. (Birds feast on mosquitos that bring disease etc) How to you intend to account for the great loss of riparian habitat?? The list of the benefits of natural habitat is long! And even if many more trees are 'saved' vs the original proposal, just the heavy equipment around the root systems of the remaining heritage trees will cause slow and painful deaths! (Slow for the trees, painful for the users of the Parkway)
- 8 |

Decisions on this project should not be taken lightly and only after sufficient review & discussion by ALL of the parties. The positive AND negative need to be addressed for the well being of the general population and not just for those eager to put their name on a big project in order to earn promotions or negotiate contracts to maximize profits.

Everyone in the decision making process must be made available to address each and every question & concern posed.

I know there are others who will be in contact regarding the technical and scientific aspects. I wish to be on record regarding the detriments to our community that outweigh the benefits of the project as it is planned now.

Let's get to work to make it more palatable for all those who use and live along the Parkway.

Nature has given us a spectacular gift for all ages that enhances the livability of the entire region, now and hopefully for generations to come. Let's protect it...please!

Respectfully,
sevim larsen

- 9 | ps I was a licensed real estate agent for 25 years before my retirement. The project that is presently being proposed will affect the value of my property in a negative and permanent way. This neighborhood has maintained good value not only because of its proximity to services but mostly due to the beauty and proximity (and health benefits) of our verdant Parkway.
- 10 | pps I made a sizeable contribution to have a 'bench' placed along the parkway in memory of my late husband. It is located along the bike trail where Estates Drive intersects the bike trail. I trust that the benches will remain in place. Please advise.

sevim larsen
SEVIML@aol.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 2:58 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: American River "channel" Desecration

From: Parrott, George <geo241@csus.edu>
Sent: Tuesday, February 20, 2024 1:55 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River "channel" Desecration

Planning and Review Staff,

I have lived along the American River from Arden Way to CSUS to Natomas from 1969 to 2007, and as a ultra-marathon runner regularly used the American River Multipurpose Trail to commute from my home to the CSUS campus where I was a Professor. Over those many years and miles of running, I enjoyed the natural ecology of the river channel with trees and vegetation and even the Golf Course between the 6 and 7 mile points along that paved running route.

Over the last two+ years, I have been in agony seeing the total removal of all the natural vegetation and even the Golf Course for the "improved flood control" project that is still underway.

This TOTAL REMOVAL of all the natural vegetation, the mature large trees and even smaller bushes considerable distance from both the levee and the main channel is a total DESECRATION of the natural beauty that so many of us have long enjoyed and treasured.

I MOST STRONGLY request that nothing like this EVER be approved and done again. This area which was a natural beauty in our now crowded urban environment of roads and concrete has been LOST and this loss will be felt for several generations until native growth recovers. This should NEVER have happened.

Respectfully

George L. Parrott, Ph.D.

Past President, Buffalo Chips Running Club, Sacramento

Volunteer English Conversation Instructor
West Sacramento Library Community Service Programs

Fulbright Scholar, SWPS Warsaw Poland 2013
Invited Professor of Sports Psychology, Univ. of South Australia 2003
Fulbright Professor, Manchester Metropolitan Univ., 1992-93

Professor of Psychology, emeritus
California State University, Sacramento

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 1:53 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] American River project

From: Scott Anderson <scottrobertanderson@gmail.com>
Sent: Tuesday, February 20, 2024 12:59 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River project

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 my bicycle from Gristmill to Sac State everyday to get to work downtown. This is the one activity that makes me feel at peace and so grateful to have such a precious piece of nature in an urban environment. I walk all over on the river banks and have not witnessed any serious erosion problems with all the trees and vegetation. I can't even imagine the huge negative impact that this project would cause to me and everyone I know who enjoys this parkway. I witnessed the destruction first hand every day while riding through the Sac State area. It blows my mind how what they have done there is actually supposed to prevent erosion. If fact these pictures of the north bank near Howe ave show that it's making erosion WORSE!! In the last picture where it hasn't

1 | eroded yet, how is that netting and straw suppose to hold back multiple high flows and how will anything grow back? There has got to be a BETTER way to repair isolated areas that may be a problem rather than decimating the entire riverbank!! Sincerely, Scott Anderson









From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 1:54 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Alicia Ward <aliciaward96@gmail.com>
Sent: Tuesday, February 20, 2024 1:30 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

I bicycle there and swim there often with my two dogs!

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§

21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms)..

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Alicia Ward

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 1:51 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Kent Augenstein <kentaugenstein@gmail.com>
Sent: Tuesday, February 20, 2024 12:49 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

My girlfriend and her family live on the river and that area has grown especially close to me. Seeing how it a part of their every day way of life it has also become a part of mine when I am there visiting. The river is enjoyed by so many people whether it is paddle boarding, swimming, or just relaxing by the shore. The reason this all happens is because of its serene and pristine beauty, and the thought of losing that is rather heartbraking.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other

reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms)..

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Kent Augenstein

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 1:52 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Project

-----Original Message-----

From: Louise Davis <louised5761@gmail.com>
Sent: Tuesday, February 20, 2024 12:57 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Project

To whom it may concern:

This letter is concerning the trees and wildlife that is along the American River. Would you please reconsider the American River Project. It would affect the wildlife and the old oak trees that have been and live in the area of your project. The trees that have been planted here and have set their roots here. Also the trees have given people and wildlife shade for rest. The trees have given the wildlife a place to come home to. The birds, deer, squirrels and wild turkeys have all adapted peacefully in this area. I am asking for you to reconsider this as it will not only the trees and wildlife but the community that live along the American River.

Respectfully,
Louise Davis

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 1:50 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Rebecca Jagers <rebeccajagersart@gmail.com>
Sent: Tuesday, February 20, 2024 12:40 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway is extremely valuable to me.

My husband and I walk every single day along the river. It contributes immensely to our mental and physical health. We enjoy the quiet, the trees and vegetation, the birdlife, the wide range of wildlife we see, the natural, wild and healthy riparian area. Sometimes I paint on the river.

We have bicycled many hours and miles on the bike trails. We used to kayak on the river but that was when we were younger. My brother travels here to fish on this famous river. This river and its natural, wild state is so very very valuable to us it is beyond what I can express. A manufactured shoreline with the natural beaches gone is a dreadful, nightmarish, unthinkable plan.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a

much more surgical, fine-grained approach (with less environmental impacts) are not presented.

My specific concerns and comments include the following:

B Tree removal. Vegetation removal. Disturbance and destruction of fish habitat. Disturbance and destruction of bird and wildlife habitat. Removal of natural beaches. Wild and Scenic Rivers Designation, how can this designation be ignored? Recreation opportunity lost. Loss of health and beauty of riparian area.

C Lack of adequate detailed information provided timely to interested parties. Lack of workshops and engagement with community for input.

I fear that the ugly, sterile abomination that is the work done near the J Street Bridge is coming to our area.

The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.\

The American River Parkway is often called the "Crown Jewel of Sacramento". These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

Rebecca Jagers

rebeccajagers.com

rebeccajagersart@gmail.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, February 20, 2024 1:50 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: JAMES/BETTY COOPER <bettycooper@comcast.net>
Sent: Tuesday, February 20, 2024 12:27 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me. I have lived within walking distance of the lower American River for 30 years, on both the north and south banks of the river in the area where this project is proposed. I walk the Parkway at least 2-3 times per week and am eternally grateful for the scenic and recreational values it provides as well as critically important habitat for migratory fish and birds, many of which are protected by federal laws.

I have witnessed record high water flows since 1979 and have not seen significant erosion occur during those times. Clearly the vegetation along the banks has provided erosion protection during high water events. Furthermore, there has been a notable effort to plant native trees and plants along the shoreline to aid in erosion protection. The levees have been raised and a seepage protection wall inserted. In addition, Folsom Dam improvements and revisions of water flow management have considerable effect on flood protection.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions

are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Betty Cooper

SEIS/SEIS public comments from Erik Gabele

E5-5 Recreation Contract 3b

c. Cause substantial long-term disruption in the use of an existing recreational resource, reduce the quality of an existing recreational resource, reduce availability of an existing recreational resource or result in inconsistencies or non-compliance with planning documents (such as the American River Parkway Plan):

REC-1 is addressed as mitigation measure for this but REC 1 only address detours and signs. The long term impact impedes safe access to the riverbank from paths and roads with the new improvements. There are dirt pedestrian and equestrian trails on the north side of the American River which will be impacted and there is no mention of addressing these. River mile 8.5 to 10.5 is a long established, well used and productive fishing area on the American River on the south bank. If the south bank is altered anything like the north and south banks near the J Street Bridge, safe access to the river will be permanently removed and that is a very significant long term recreational impact. In addition to recreational anglers, there are guides who depend on the American River being fishable as part of their livelihoods. There is a boat launch facility on the south side of the river at Watt Avenue. This must remain.

3-41 Description of levee work and associated figures don't provide enough detail to the public to actually understand what the final improvements will look like. For example, The second paragraph under Site 4-1 states "In addition, there are locations at Site 4-1 where there is a launchable toe at the riverbank toe (referred to as bank toe in Figure 3.5.2-9)" Nothing on Figure 3.5.2-9 indicates "bank toe" and the launchable toe is shown 1/3 of the way into the river. If that is the case, this is a problem because that part of the river channel is solid clay. Please provide the public with more detailed design details and plans so we can see what the final improvements will look like. The recreational value of this area is extremely important.

ES-12 Aesthetics and Visual Resources Contract 3b **Have substantial adverse effect on a scenic vista:** Long term identified as less than significant however the mitigation measures call for VEG-1 and VEG-2. VEG-1 mitigation is off site and does not restore the scenic vista demolished for this project. Please indicate clearly which areas will not be restored by either by saving on-site trees or replanting. Right now all the public can decipher is that trees will be saved to the maximum extent practicable and that design will indicate trees to be lost and saved. Make this available to the public for review.

3-29 Table 3.5.2-1: Please indicate areas of bank protection which will receive riprap without soil fill. Riprap without fill and vegetative growth is aesthetically devastating to the American River Parkway as is evident on the south bank of near river mile 9.8. There has to be some type of ground cover and soil to fill voids that would screen the rip rap.

3-35 Figure 3.5.2: Construction access is shown along the entire north levee road of Site 4-2. There are several dirt pedestrian and equestrian trails between the paved bike path and the river bank. Ensure that although the contractor has access along the levee road, the public will still be provided access to the river. There are 2 known public access points on the North side between Estates and Rio Americano High School. Public should have access to the river at this location during construction.

8 **3.5.2.1.5:** Multiple expansive areas are being disturbed before prior construction sites have a chance to revegetate. I've observed several eroded areas in the newly placed planting benches and soil filled revetments from relatively small events. The soil is quite erodible. What is the plan if several riverbank miles of fill are eroded away during a very wet winter with high releases from Folsom Lake? Will there be Federal O&M funds to assist in mitigation, or will the public be expected to live with a bare riprap banked river within a wild and scenic river? It seems doubtful the LMA would be able to adequately fund planting bench replacement, revetment fill, and landscape plantings.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 4:31 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Contract 3B, American River

From: Steve Jones <steve@designtech-ids.com>
Sent: Wednesday, February 21, 2024 4:21 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; AmRivTrees@gmail.com
Subject: [Non-DoD Source] Contract 3B, American River

Dear Sirs/Mmes:

The issue of flood control is, of course, essential to all area residents. However, a balanced approach to flood control is also very important – at least to me and my family.

We live .9 miles from the American River Bike Trail. This is one of the *primary reasons we purchased a home in this area*. We are on the trail (between Watt Avenue and the Harold Richey Memorial Bridge) and its many sub-trails *multiple times* every week. Including *this very morning*, when I came across a doe and 3 fawns, a coyote, multiple quail, turkey and waterfowl, etc., etc. That's just one day's sightings. We wonder where all of this wildlife goes when the levees look like this:



In addition to no wildlife habitat, the Sac-State-to-Paradise-Beach mitigation project (that we pass *every weekday* on the way to work) is also a visual disaster.

Concerned about this proposed upriver project, I reached out to professional environmental consultants whom I know personally – Geologists, Hydrologists, Geomorphologists - to get their professional opinion and become more informed regarding the Draft SEIS-SEIR Report.

Here are (some of) their (collective) comments:

1 Regarding the Sac-State-to-Paradise-Beach project:

- It appears the Corps discarded the working group's findings and used their own plan instead
- "... the designs could have been much better looking at Sac-State-to-Paradise-Beach:
 - poor uniform bankline,
 - excessive uniformity in slopes,
 - lack of shoreline habitat (wimpy little sticks for Instream woody material).
 - Overall, a HUGE loss of opportunity. Hopefully, it will revegetate successfully."

Regarding the proposed upriver project:

- 3 • "There is little detailed information in the EIS. Consequently, it's not very clear; does not explain well what is proposed (i.e.: no amounts of trees to be removed – only 'field-based decisions. So it's really up to the removal contractor – who probably gets paid by home much they move. Seeing the engineering plans would be more enlightening – are they available?
- 4 • The alternatives assessment was pretty weak as well
- 5 • "There are plenty of people pissed off about how badly the Sac-State-to-Paradise-Beach turned out – substandard in terms of restoration practice and geomorphic conditions. So – if that's the lead example, then the EIS is not credible to state that 'long term there is no impact and that biological and visual conditions will return in future'. There needs to be better design."
- 6 • "Not sure how this shakes out with other interested parties (County Parks, agencies, etc.) **or what powers can stop it.**"

Our request is that the Corps will reexamine their proposal, include more community input and render a more balanced approach to the project. We cannot imagine running, biking, picnicking, flyfishing and kayaking (all of which we do now) on river banks composed entirely of riprap and denuded of trees and riparian growth. Thank you.

Sincerely,

Steve and Beth Jones

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 4:30 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Importance: High

From: Kathy Kasic <kathykasic@gmail.com>
Sent: Wednesday, February 21, 2024 4:17 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: AmRivTrees@gmail.com
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

I ride my bike to work every day along the river trail, spend my mornings walking along the trails, and enjoy kayaking the river. It is a place of solace and peace for all.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk

guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms)..

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway

Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway's wildlife. A "surgical approach", not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river's edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities." Among the values noted was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees." Part of what makes this "riparian hardwood strip" so valuable for recreation is that "the riparian vegetation is carefully protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate

these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Kathy Kasic

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KATHY KASIC
Associate Professor of Film
Communication Studies Department
California State University, Sacramento
<http://kathykasic.com>

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 4:26 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Patty selsky <phselsky@surewest.net>
Sent: Wednesday, February 21, 2024 4:08 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

[YOU CAN CUSTOMIZE HERE WITH YOUR PERSONAL CONNECTION WITH THE PARKWAY AND THE WILD AND SCENIC AMERICAN RIVER].

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

[NAME]

Sent from my iPhone

Dear Army Corps & DWR/CVFPB,

My name is William Brattain, P.E., and I am a resident near the proposed work along the Lower 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 *Draft American River Common Features, 2016 Flood Risk Management Project, Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV* (Draft SEIR), and in particular, for the proposed work under Contract 3B at River Mile 10.4-10.5, Larchmont Park. I have already submitted six sets of previous comments on Draft SEIR 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, the riverbank thickness at Larchmont Park River Mile 10.4-10.5, compliance with the federal Wild and Scenic Rivers Act, the erosion work done under previous contracts during the summer of 2022, and the lack of erosion threat to the levee at River Mile 10.4-10.5 south, Larchmont Park. The comments in this submittal focus on the regulations for levee certification and why the proposed work at River Mile 10.4-10.5 south at Larchmont Park (circled on the following map) is far beyond what is needed to meet the requirements in those regulations. These comments also focus on why the proposed work will make the levee system less safe during a period of relatively high vulnerability before the future work to raise Folsom Dam is completed.

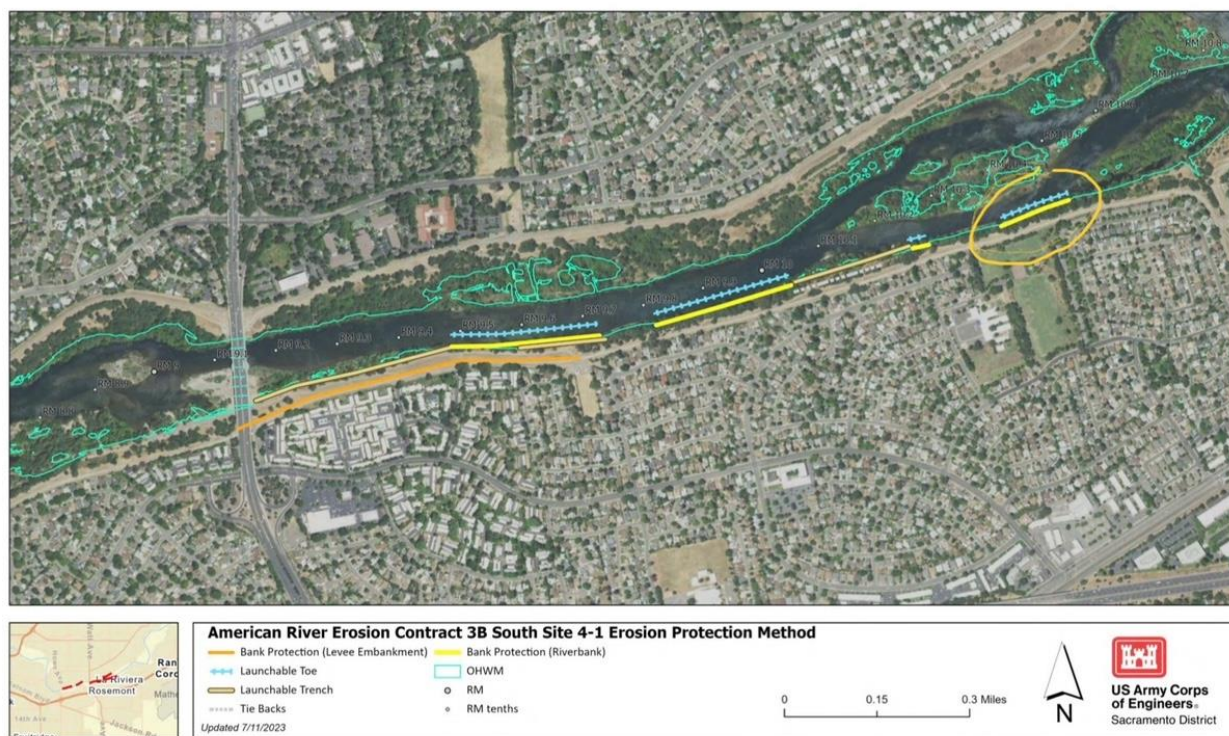


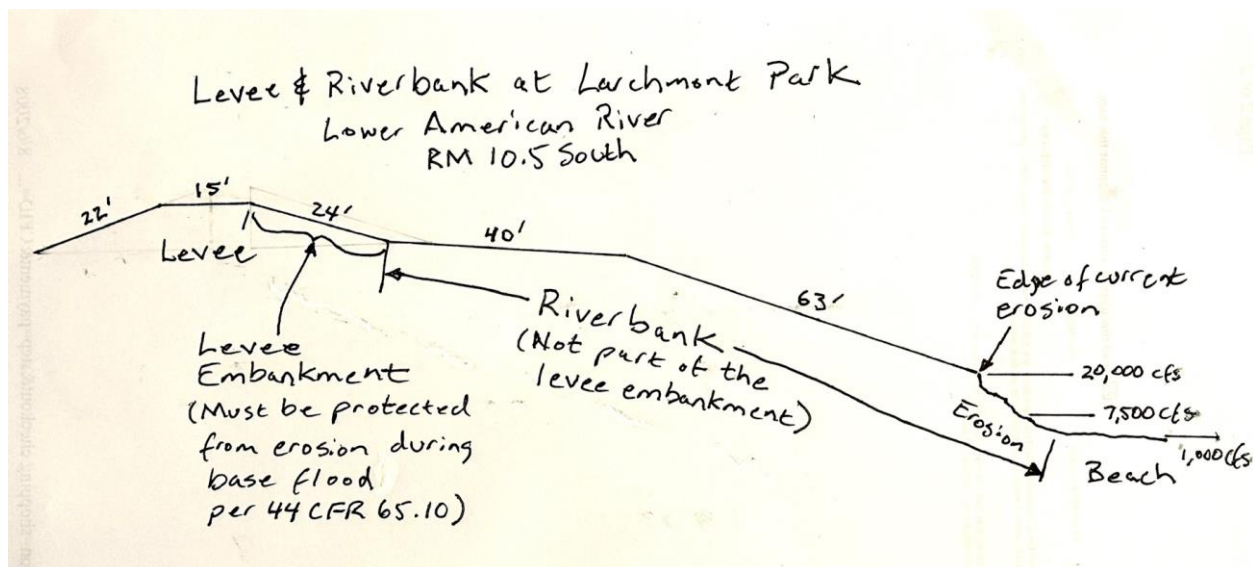
Figure 3.5.2-9. American River Erosion Contract 3B South Site 4-1 Details

For levee systems to be accredited by the Federal Emergency Management Agency (FEMA), communities and levee owners must certify that levee systems are adequately designed and operated to provide reasonable assurance that protection from the base flood is provided. The base flood is one that has a 1% chance of happening in any given year (a 1 in 100 year event); however, for the Lower American River and Sacramento River system around the Sacramento area,

accreditation is sought for a 1 in 200 year event (or such is my understanding). Without accreditation for the at least 1 in 100 year event, homeowners in the flood zone protected by the levee system would be required to purchase flood insurance to obtain a mortgage or if they have an existing mortgage.

The regulatory requirements for levee systems are given in 44 Code of Federal Regulations (CFR) 65.10. The regulations include requirements for freeboard, closures, embankment protection, embankment and foundation stability, settlement, and interior drainage/seepage. The levee system for the Lower American River already meets each of these requirements; however, prior to obtaining certification additional work is being done to ensure the embankment protection requirement is met for protection from erosion.

The following is a to-scale cross section of the levee and the riverbank at Lower American River Mile 10.5 south (RM 10.5 south) at Larchmont Park. The levee embankment requiring protection from the base flood under 44 CFR 65.10 is the 24-foot long interior sloped section of the levee, as noted in the figure.



In order to obtain accreditation, the levee owner only needs to certify that the levee embankment is protected from erosion during the base flood. It is not necessary to also demonstrate that the entire length of the riverbank is protected from erosion; however, erosion of the riverbank should not be allowed to threaten the stability of the levee. It should be expected that some erosion will occur at the base of the riverbank (a.k.a., the streambank) as this is a natural process for any river. In the case of the levee and riverbank at RM 10.5 south, there is over 100 feet of densely-vegetated riverbank between where the erosion has occurred over the past many decades to centuries, but this erosion is not threatening the levee and should not be considered to be erosion of the levee embankment that would violate the 44 CFR 65.10 requirements and prevent certification.

Furthermore, the stability of the riverbank and lack of erosion threat to the levee at RM 10.5 south have already been established. The July 25, 2019 memorandum entitled *Lower American River Erosional Conditional Risk Assessment: Subreach 1, 3, and 4* includes notations about "favorable conditions" that support this assertion, as highlighted here:

Segment 3: Left bank - RM 10.4-10.5

Adverse condition (1)	Favorable condition (2)
<ul style="list-style-type: none">History of bed and sill incision. History and likelihood of channel changes and higher velocity impinge on left bank. Overall a lot of uncertainty at this segment due to channel instability. Potential for encroachment into low bank at 115k-160k if bed lowers significantly at bank toe.	<ul style="list-style-type: none">Dense veg/root mats cover much of bank. Levee fully grassed and velocity and wind wave attenuated by dense shrub mass at TOB next to footpath. Coarse material in bed. 115k below landside elev.
Adverse condition (1)	Favorable condition (2)
<ul style="list-style-type: none">no revetment; narrow berm; moderately high velocities; bed lowering in area	<ul style="list-style-type: none">good past performance; vegetation on berm
Adverse condition (1)	Favorable condition (2)
<ul style="list-style-type: none">Long term trnd is for additional sill degradation and RL bank over-steepening and retreat.	<ul style="list-style-type: none">Water surface elevations too low for levee breach 40-115K; water velocities low on lee at 160K cfs.

In particular, the memorandum notes that dense vegetation and root mats cover much of the bank, that the riverbank has had good past performance in past high water events, that water surface elevations are too low for levee breach at river flows of 40,000 cubic feet per second (cfs) to 115,000 cfs, and that water velocities are low on the levee (embankment) at 160,000 cfs which is the maximum flow for the 1 in 200 year event. This last part is important because it means that the levee embankment would not be under any erosion threat during the base flood, which is all that is required to be certified under 44 CFR 65.10 regarding erosion of the embankment. Furthermore, in the *2017 Lower American River Streambank Erosion Monitoring Report* it was noted that for RM 10.5 south that "the erosion at this site does not currently threaten the integrity of the levee due to the existing width of the berm" which refers to the 100+ foot distance from the erosion to the base of the levee embankment.

1 The proposed design of the erosion work at RM 10.5 south in the Draft SEIR is extremely vague with no drawings of the work provided for this location, but my understanding is that truck ramps will be cut in at each end to install riprap along the beach, along the edge of the erosion, and that riprap will also be trenched in with tiebacks and planting benches above the erosion area. The work will involve removing virtually all of the trees and vegetation and cause massive soil disturbance to install the truck ramps, riprap, tiebacks, and planting benches. The work will be destroying most of the "favorable conditions" noted in the memorandum by removing the dense vegetation, root mats, and it is my opinion that the soil disturbance will leave what remains extremely vulnerable to erosion. Even if the new vegetation grows in as planned, the underlying riprap will prevent good root growth will likely wash away in high water events, especially if the riprap launches as it is designed to do. It is my opinion that the erosion that this project is trying to prevent will

immediately be advanced well past where it would ever advance if a less destructive design is use or if no work were to be done. It is also my opinion that the project virtually guarantees a future condition where the new erosion front created by the disturbed soil, lack of good vegetation and root mat, and destruction of the planting bench by the launching of the riprap will create a much worse erosion condition than would exist if no work were done. This while simultaneously destroying the riparian forest, wildlife habitat, and the recreational uses of the waterway for fishing, etc.

Instead, assuming some erosion fortification using riprap must be done, I suggest that the riprap only be placed along the eroded edge and not extend far enough to completely block the beach. Few if any trees or vegetation should need to be removed, and a deployment method that does not require removal of trees for the truck ramps should be used which should be possible with a significantly smaller footprint for the riprap.

As evidence that what I am saying can regarding making erosion worse and will come about, I include several pictures of the erosion control work done downstream during 2022. Note that erosion is occurring along the waterline and occluding the river, and that more extreme erosion is occurring on the riverbank, neither of which would be happening if the work hadn't been done. Also note that after two years, there is no vegetative growth, no trees, and no indication there ever will be. In my opinion, these areas are extremely vulnerable to erosion if a high-water release occurs, and particularly during the period before Folsom Dam is raised. It is my opinion that this work and the work that is planned under Contract 3B will make us significantly less safe and could cause a catastrophic levee failure that would not have occurred under conditions that existed prior to the work.





- 2 I ask that, at a minimum, the erosion work at River Mile 10.4-10.5 south under Contract 3B be suspended indefinitely pending re-assessment of the threat (including soil sampling that was never completed), and if necessary, a different erosion work strategy be used that does not involve the removal of trees and other vegetation or cause massive soil disturbance or require placement of large amounts of riprap and destroy the heavy recreational use at this location. I also ask that if
- 3 Army Corps is unwilling to suspend or modify the work at this location, that the Central Valley Flood Protection Board, as the lead agency under CEQA, demand that the work be suspended to develop a
- 4 plan where trees and vegetation are not removed, the natural soil is not disturbed making it more
- 5 susceptible to erosion, and that the recreational uses of the beach at this location are not destroyed. Given the number of engineering opinions I assert in these comments, I include my California professional engineer license stamp, below.

Thank you,

William Brattain, P.E.



From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 4:03 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Lower American River - 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: Greg Gearheart <olawai@gmail.com>
Sent: Wednesday, February 21, 2024 3:46 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; publiccommentarcf16@water.ca.gov
Cc: Jonah.Knapp@cvflood.ca.gov; BellasE@saccounty.net; Sean Bothwell <sbothwell@cacoastkeeper.org>
Subject: [Non-DoD Source] Lower American River - Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

I live nearby and paddle this reach affected at least 30 times a year. I take groups to paddle here from out of town and center equity in the events to make this place a showcase of #swimmableCA, per the [resolution](#) adopted by California Legislature making July 25 "Swimmable California Day" every year. This project threatens the work many have done to make this section of the Lower American River the most iconic, swimmable river in the Country.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are "necessary" for (or would even actually improve) flood safety along this section of the American River. If the project proceeds as planned the project will cause significant impacts economically, ecologically and disparately to adjacent communities, making this project environmentally unjust and racially inequitable. In addition, the project will affect communities outside the local area, as many events and tourists use this area to recreate (and will go elsewhere for many years). Migratory wildlife will be significantly affected, too, from the removal of habitat and shaded riparian areas. Finally, this will increase human contribution to climate change due to reduced bike commuters and an increase of urban heat island effect during and beyond the construction window.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much more targeted and less impacting approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to

supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” everywhere there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary

School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access

for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river's edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities." Among the values noted was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees." Part of what makes this "riparian hardwood strip" so valuable for recreation is that "the riparian vegetation is carefully protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild

and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B—south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Questions:

(1) have you done a community centered economic and health analysis of the proposed solution using racial demographically disaggregated community data? What was your method and does it consider cumulative

impacts like air pollution, heat island effect, mental health and other drivers?

(2) does the project as proposed align with studies the Corps of Engineers has produced over the last two decades showing trees can be both helpful to levee strength as well as potential risks for levee failure? Based on what we saw in River Park it seems like the current thought is that virtually any and all trees on levees and within floodplains are considered a risk that needs to be mitigated.

(3) do you have up to date user data for this reach and surrounding parkway, including data on swimmers and boaters? Would it be possible to synthesize demographic or economic data to help the communities impacted have a better sense of the value of their losses?

Thank you.

Greg Gearheart

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 4:02 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Mari S Golub <msgolub@ucdavis.edu>
Sent: Wednesday, February 21, 2024 3:22 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

We have lived less than a block from the levee off Kaden's Drive for over 40 years. During this time we have seen minimal erosion and no flood threats in this area.

The parkway has planted legacy trees along the bike trail, horse trail and levee trail. The neighborhood monitors trash and tree damage regularly. We have a stake in the future of this area.

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. And I can attest that the recreational value of the parkway, its main function, will be seriously affected. Flood control and recreation are intertwined and both must be weighed.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the

Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

[NAME]

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 4:01 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: SAVE THE American River.

From: Barbara Ray <bray38@hotmail.com>
Sent: Wednesday, February 21, 2024 3:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; Barbara Ray <bray38@hotmail.com>
Subject: [Non-DoD Source] SAVE THE American River.

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway is extremely valuable to me.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.\

The American River Parkway is often called the “Crown Jewel of Sacramento”. These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

Barbara Ray

6344 Slippery Creek Lane

Citrus Heights CA 95621

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 3:56 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] USACE American River 'Erosion' Project

-----Original Message-----

From: Toni Michel <tonikmichel84@gmail.com>
Sent: Wednesday, February 21, 2024 2:09 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] USACE American River 'Erosion' Project

My name is Toni Michel. I was born and raised in Sacramento and have resided in the College Greens East neighborhood for almost 46 years. I am writing because of my concern with the proposed levee project from Howe Avenue to just beyond this neighborhood.

1 | The plans to clear cut the north and south levees is nothing more than the total destruction of the river parkway and our beautiful Wild and Scenic River which is an area protected by the Wild and Scenic River's Act of 1968. Sacramento is a city built on two rivers and is known as the City of Trees. This project proposes to destroy hundreds of trees some of which have been here easily for a century or more and displace the rich wildlife that contributes to the balance of the river's ecosystem. I have seen the sterile destruction downstream. I am aware that levees must be maintained, but at what cost? Please add my name to the others who have come before me voicing our concern and disapproval of this project. There has got to be a better way!

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 1:31 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Cara Ball <caraball@ymail.com>
Sent: Wednesday, February 21, 2024 1:30 PM
To: publiccommentarcf16@water.ca.gov
Cc: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

My family has lived in the COLLEGE GREENS EAST NEIGHBORHOOD for close to 30 years. We regularly use LARCHMONT COMMUNITY park. We walk the levee and trails up and down the American River daily for exercise and we kayak the river in the summer months. The park and river are a large part of why we enjoy living here. We don't see a reason to intervene and disrupt the river and its surroundings to stop or limit erosion. There is little to none that has been visible in my 30 years living here that I've witnessed. Even if there was, the plan drawn up appears to destroy much of the natural ecosystem of that river as well as its natural beauty that all my neighbors enjoy about living here as well as the habitat for many wildlife that call this area home too.

Please, please reconsider this design project. We do not want to lose the natural beauty we enjoy so much. If the project does move forward against our wishes and many of our neighbors, please do as little as possible to the landscape and limit the intervening of mankind on this beautiful waterway.

We are not looking forward to the trucks, tractors, the dust and diesel fumes we'll all have to deal with for years and our poor school kids health as there is a public elementary school adjacent to LARCHMONT PARK called O.W. ERLEWINE ELEMENTARY. We will all suffer the health consequences of all the large equipment going in and out and constant work being done near us. We'll have a river bank that looks more like a canal

and all the wonderful wildlife will have been displaced. I hardly see us using the river after a project like this. Please reconsider this project. After all, its our homes and families that will potentially be at risk to the flooding. We all want a safe community and a project that works for everyone.

Thank you,

Cara Ball
Sacramento CA.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 1:13 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] RE: please refocus the American River levee project

From: candace furlong <furlong@surewest.net>
Sent: Wednesday, February 21, 2024 12:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PubliccommentARCF16@water.ca.gov
Subject: [Non-DoD Source] RE: please refocus the American River levee project

I abruptly sent this (see below) without signing. Thanks for your consideration.

Candace and Jerry Furlong
1401 Arroyo Grande Dr
Sacramento, CA 95864
(916) 215-2169

From: candace furlong [<mailto:furlong@surewest.net>]
Sent: Wednesday, February 21, 2024 12:41 PM
To: ARCF_SEIS@usace.army.mil
Cc: PubliccommentARCF16@water.ca.gov; furlong@surewest.net
Subject: please refocus the American River levee project

Hello. I would like to address the planned work along the American River Parkway, from Watt east.

1 My husband and I, our large extended families, and multiple friends and co-bikers, fellow-runners, are on this bike trail and/or other dirt paths, on a constant, often daily, basis. We moved within a few miles of the Parkway very much deliberately, as have our kids since then (Arden Park x 5 homes), JUST TO BE NEAR THE PARKWAY. We BELONG TO LOCAL BIKE AND RUNNING CLUBS THAT MEET AND HAVE MULTIPLE SANCTIONED EVENTS ON THE PARKWAY. We pay yearly to support the American River Parkway.

The shocking evidence of the destruction further down the river, around Fair Oaks, Howe Ave, has turned that once-beautiful verdant and shady area into nothing more than a ditch, or a canal, in appearance and function. This will be happening soon further east of Howe, toward Watt, and east of Watt, and this is totally unacceptable, both to the American River Parkway and to save our levees from erosion.

- 2 | A more targeted effort, as in smaller and less-destructive, work needs to be considered and undertaken. The purpose and stated guidelines for the Parkway include nature and recreation, and these are both imperiled greatly by this drastic and over-reaching project. Further erosion, but in different (and unforeseen) areas is bound to occur as a result of this “scorched-earth” type of massive destruction of forest, bush, and habitat.
- 3 | The removal of so much green space is so very detrimental to our air quality. THIS GOES DIRECTLY AGAINST CLEAN AIR POLICIES.
- 4 | The devastation of the riparian Parkway must be avoided. **A focused approach, more targeted to specific erosion areas, is possible, IS NEEDED, and so much more appropriate.**

Thanks you for your consideration.

February 21, 2024

RE: 3B American River USACE

To whom it may concern:

1 This project should be IMMEDIATELY put on permanent hold until further research is done regarding its' continued necessity and scope. The American River watershed experienced one of its' greatest snowpacks in recorded history during the winter of 2023. (Dept. Water Resources - DWR, March & May 2023) During this period, Lake Shasta, Lake Oroville, Lake Almanor and Folsom Lake were all near capacity.

However, due to modern computer profiling by the DWR, ASO air surveys using LiDAR and image spectrometer technology, the American River runoff during the spring of 2023 was managed brilliantly by the DWR. The American River water level never reached anywhere near flood stage in the mile and one-half project area of 3B. In fact, it never even reached the lower road behind the levee at Sara Park.

As a homeowner at 2450 Rogue River Drive since 1980, I have experienced near flooding conditions in 1986 and high river water levels in 1996. There have been extensive upgrades to the American River levees in the proposed project area since then.

2 There are many critical and timely northern California flood control projects that these construction funds could be diverted to including the Sites Reservoir and revisiting the Auburn Dam. The magnitude of the current 3B is overkill and some minimal annual cleanup of deadfalls and understory in the project footprint would be adequate.

In summary, the winter of 2023 record snowpack and how it was handled expertly by the Water Resources Board was a game changer for 3B making the current plan obsolete.

Sincerely,

Timothy Conway

2450 Rogue River Drive, Sacramento, CA 95826 – timjconway@msn.com – 916-996-4532

Cc: Congressman, Senators, Sacramento Board of Supervisors, Governor Newsome, Fish & Game, Trout Unlimited, Sierra Club

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 1:10 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

-----Original Message-----

From: David <dball.cgehoa@yahoo.com>
Sent: Wednesday, February 21, 2024 12:42 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

1 My family has lived in the college greens east neighborhood for close to 30 years. We regularly use Larchmont park, my family walk the levee and trails up and down the American River daily for exercise and we kayak the river in the summer months. The park and river are a large part of why we enjoy living here. I just don't see a reason to intervene and disrupt the river and its surroundings to stop or limit erosion. There is little to none that has been visible in my 30 years living here. Even if there was excessive erosion, the plan drawn up appears to destroy much of the natural ecosystem of the river as well as its natural beauty that all my neighbors enjoy about living here and the habitat for many wildlife that call this area home will never be the same for centuries.

2 I could see a design that went in, made improvements, moved rocks native to the environment into strategic areas and then left the river and banks it in a state that looked like man had never touched it. But that is not what this is, this project is something much different, attempting to alter the river bank natural process that has survived for billions of years by intervening in something that computer models tell you is needed.

I know, we probably won't be able to stop the project from moving forward on our part of the river because there is lots of money and jobs that rely on this project being done. I'm going to continue to ask that you do it with a light hand and try to make it look as though it was never touched. It should be done and It could be done if you wanted it done the right way.

3 And then there's the trucks, tractors, the dust and diesel fumes we'll all have to deal with for years during the project
4 implementation and our poor school kids health. Many kids these days have asthma and other breathing difficulties. All
of us who live nearby will suffer the health consequences of all the large equipment going in and out and constant work
being done near us. We'll lose the use of our park for years and then when it's all done, we'll have a river bank that
looks more like a canal and all the wonderful wildlife will have been displaced. I hardly see us using the river after a
project like this is done. This project really needs to be reconsidered and it should consider those that live here and
what we want more than anything else. After all, it's our homes and families that will potentially be at risk to the
flooding. We all want a safe community and a project that works for everyone.

David Ball
Sacramento, CA

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This email has been checked for viruses by Avast antivirus software.
Blockedwww.avast.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 10:46 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: Bradley Sanders <bradley.w.sanders@gmail.com>
Sent: Wednesday, February 21, 2024 10:40 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) 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 As a homeowner that lives on the levee and frequent user of the river and trails the health and beauty of the area is very important to me. I question the need for this project and have seen the impact on other parts of the river and would hate to see this area be stripped of its beauty. There is also a financial component that the value of my home would be strongly impacted by this project if the beauty and access to the river were destroyed.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts,

including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

My specific concerns and comments include the following:

B

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?

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.

Bradley Sanders

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 10:10 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] River project.

From: Gary Peterson <redski3131@gmail.com>
Sent: Wednesday, February 21, 2024 10:09 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] River project.

1 | I implore the ACOE to reconsider your stance on this project! This is wrong on so many levels, as I and many others enjoy everything about the American River! Please don't destroy what nature has built. Thank you. Thank you. Gary Peterson

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 10:04 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comment Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR)

From: Erik Gantenbein <egant2014@gmail.com>
Sent: Wednesday, February 21, 2024 9:50 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comment 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):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me. I have lived most of my life in Sacramento County and have worked and volunteered extensively on the parkway, promoting and enhancing the natural landscape. I am quite familiar with the proposed work areas having worked as a contractor on the revegetation associated with the previous projects, as a stewardship volunteer for the Parkway and have been active in habitat

conservation for over 30 years. I have lived through many high water events on the American River, and am aware of the concerns for flood protection during extreme weather events. However, I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed

project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutants on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this

protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – **could actually make us more vulnerable, not less!** The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river's edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities." Among the values noted was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees." Part of what makes this "riparian hardwood strip" so valuable for recreation is that "the riparian vegetation is carefully protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as

“scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B—south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of

all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much

MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Erik Gantenbein—a Sacramento County resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 10:03 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: Teresa Ortega <teresa.elena.ortega@gmail.com>
Sent: Wednesday, February 21, 2024 9:38 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. It provides Sacramentans invaluable access to nature, shade, and recreation. We know that access to nature and recreation has innumerable health benefits.

I am strongly concerned about making Sacramento flood resistant and protecting lives and homes. Yet this is part of my very concern about the project as planned. Trees and other vegetation can be part of the equation of flood management, as they can help prevent erosion.

For this reason, I strongly question the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings. This may worsen, not improve, our flood risk, all the while destroying a living ecosystem that is irreplaceable in our lifetime or the the next.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.\

The American River Parkway is often called the “Crown Jewel of Sacramento”. These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 10:02 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

From: Kristen Baker <bakerkristenann@gmail.com>
Sent: Wednesday, February 21, 2024 9:17 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: publiccommentarcf16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016

Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) 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

My Husband and I purchased our home on American River Drive to be close to the bike path and the wildlife along the river. We are avid bikers and walkers along the path and the parkway. I am saddened that the wildlife will be threatened. I am also saddened that the area of our parkway will look as ugly as the work that has/is being done at Howe Ave. There must be other options.

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 overall look and ability to use the area after the proposed direction is completed. What about the wildlife and the clubs that protect, raise and care for them. As a bird watcher, this will ruin those options.

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.

Kristen & Dennis Baker

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 21, 2024 9:15 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Please Help Ensure a Better USACE Proposal for American River 3B Project

From: Kristen Baker <bakerkristenann@gmail.com>
Sent: Wednesday, February 21, 2024 9:10 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; publiccommentarcf16@water.ca.gov
Cc: jonah.knapp@cvflood.ca.gov; chris.lief@cvflood.ca.gov; amrivtrees@gmail.com
Subject: [Non-DoD Source] 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:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components

until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to "Communicate, communicate and communicate as soon as possible". It is necessary for this goal to be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for "bank erosion protection". The USACE claim that this protection is "needed" is based on minimal, overgeneralized "data", and does not use

advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction of trees (including some potentially 200–300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river’s edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital

to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the “Crown Jewel of Sacramento”. Sacramento’s “jewel” deserves the utmost care now and for future generations!

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:28 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River destruction re-evaluation
Attachments: _MG_4325-Enhanced-NR.jpg

From: ELVIN NORMAN <keywesters@comcast.net>
Sent: Wednesday, February 21, 2024 9:12 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; AmRivTrees@gmail.com
Subject: [Non-DoD Source] American River destruction re-evaluation

1 My husband and I live 2 blocks from Larchmont park and therefore 2 blocks from the American River. We bought our home almost 8 years ago and feel that we are lucky to live in this neighborhood and especially along this river. We enjoy living close to downtown but being able to walk 2 blocks and be in a very different environment. The large old trees along here are so beautiful any time of year. If you've never walked this section I invite you to please see for yourselves.

I'm not an engineer or a scientist but I've listen to the 3 presentations we were able to join on zoom and what you are proposing doesn't seem to fit this section of the river. We've walked this many years now through all seasons and have never seen destruction that would warrant removing all the current vegetation. I'd like the Army Corp of Engineers to re-look at this project and use a nature based solution if there actually needs to be work done. Once you destroy this area it will be decades or longer before it recovers.

This picture is from a tree on the river at Larchmont Park, 2/19/24. I have pictures from the same tree last year, it's one you will bulldoze if this 'fix' occurs. Please re-think it. Use a Natural solution.

Elvin Norman

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:25 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: Randall Matthews <randall_matthews@sbcglobal.net>
Sent: Wednesday, February 21, 2024 9:03 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

I STRONGLY OPPOSE THE CURRENT PLAN WHICH WILL LEAVE US WITH BARE LAND FOR MANY MANY YEARS. THIS IS NOT HOW TO PROTECT THE AMERICAN RIVER PARKWAY NOR THE AREA FROM FLOODING !!.

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 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 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 environmental justice issue has not been adequately addressed in the environmental analysis.

I hope you and your loved ones are healthy and happy.

Thank you

Sherie

Dorff, Becky

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:24 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments on American River Levee Project (Army Corps of Engineers ARCF SEIS Contract 3B)

From: Nathan Domek <nathandomek@gmail.com>
Sent: Wednesday, February 21, 2024 8:24 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; Jonah.Knapp@cvflood.ca.gov; Chris.Lief@cvflood.ca.gov
Subject: [Non-DoD Source] Comments on American River Levee Project (Army Corps of Engineers ARCF SEIS Contract 3B)

To whom it may concern,

I am emailing regarding the proposed US Army Corps of Engineers (USACE) levee erosion control project, specifically regarding American River Erosion Contract 3B North and South.

- 1 I'm sure you've heard from many others so I will be brief: The environmental impact report for Contract 3B states "to the greatest extent possible, existing trees will be protected in place" (p 3-43) but if you look at what the Army Corps of Engineers did to the previous section of levee several year ago near CSUS/River Park neighborhood/Paradise Beach, (USACE levee Contracts 1 and 2), you will see that this was more akin to clearcutting -- it is obvious that only minimal thought went into preservation at all. So please forgive me and others for being extremely skeptical of this wording in the EIR. Planting a few trees here and there afterwards does not make up for the removal of hundreds of mature trees.
- 2 The proposed plan will devastate much of the natural habitat of the American River Parkway, one of Sacramento's most valued resources. There are better, more targeted methods of erosion control that don't involve total devastation of the local plant (and animal) life. Yes, it may be harder or take longer, but it would be the right thing to do. By continuing with the current plan the Army Corps will be stripping away a beloved recreation area for generations to come.
- 3 I grew up in the neighborhood just adjacent to the 3B south contract construction area. My parents still live there. Every day and especially on weekends there are dozens if not hundreds of families and recreationists out enjoying this beautiful natural environment which is a rare thing to have in a city, and something that we need to cherish and preserve. This section of the Parkway is one of the best features of that neighborhood. Its destruction will not only anger the residents here; it will likely decrease the value of homeowners' properties in the area. Would you want to live near a beautiful lush park, or a barren dirt patch?

Of course I recognize the importance of flood control measures and the fact that the levees need improvements. But the methods currently proposed for this area are far too destructive. A selective, more targeted approach is the right thing to do. Please do not go forward with the current plan as proposed.

4

In conclusion, while obviously there's not much time left now (considering the public comment period closes in 2 days), for anyone who may think I'm over-exaggerating, please take a walk along the levee trail where the USACE had their way several years ago in the CSUS/River Park/Paradise Beach area. The area to this day is mostly barren and nowhere near the thriving riparian habitat it was before.

Thank you,

Nathaniel Domek

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:21 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: Mary Howard <mhowarduu@gmail.com>
Sent: Wednesday, February 21, 2024 8:06 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 serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

A The American River Parkway is extremely valuable to me. For thirteen years I have been a docent at the Effie Yeaw Nature Center, located on the American River. I lead school groups along the trails, teaching them about the interdependence of the flora, fauna and humans who make this place their home. We value the trees for the roots that hold the soil intact, for the leaves that shade us in the hot summer and for the acorns that feed so many of the animals.

When I'm not at the nature center, I'm walking the miles of trails, breathing in the oxygen, admiring the birds, and appreciating the canopy of trees.

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:

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The USACE’s claim that bulldozing over 500 trees is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data.

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.

Mary Howard
Carmichael, CA

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:20 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: Rich Howard <rhowarda@gmail.com>
Sent: Wednesday, February 21, 2024 7:56 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; Jonah.Knapp@cvflood.ca.gov; BellasE@saccounty.net; Susan_Rosebrough@nps.gov; Barbara_Rice@nps.gov; RichDesmond@saccounty.gov; Matthew.Ceccato@mail.house.gov; repamibera@mail.house.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) 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 within walking distance of the American River and visit often for recreation, birding, and just relaxing. I am retired, but when I was working, I

commuted on the Parkway from Carmichael to downtown Sacramento.

As a soil scientist (B.S. UC Berkeley; M.S., UC Davis), 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 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

B 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. Furthermore, the proposed replanting in no way restores the multi-level riparian forest that currently exists on this stretch of the lower American River and gives it its unique character and value as wildlife habitat.

The USACE Contract 3B extends east from Howe Avenue 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.

The USACE 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”. 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.

Richard F. Howard

Carmichael, CA

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:19 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Carol McKee Marque <gofindcarol@gmail.com>
Sent: Wednesday, February 21, 2024 7:41 PM
To: PublicCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, 4A, and 4B. I am horrified and disgusted by the proposed project the draft SEIS/SEIR environmental analysis.

A As a Sacramento Oak Park resident, the American River is my place to connect with nature. To observe the native species both plant and animal. I walk there almost every day. In addition, I swim in the river regularly during the summer. I have volunteered with the American River clean-ups. The river is a precious place and an intricate ecosystem.

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) is 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.

Carol McKee Marque

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:12 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
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: Joan Rubenson <joanndavid2@gmail.com>
Sent: Wednesday, February 21, 2024 7:31 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; Jonah.Knapp@cvflood.ca.gov; bellase@saccounty.net; Susan_Rosebrough@nps.gov; RichDesmond@saccounty.gov
Subject: [Non-DoD Source] Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR)
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 my whole community, including my husband and myself.

A My husband and I purchased our house in the Larchmont Riviera neighborhood many years ago because we fell in love with the beauty of the American River in this area. We are aware that before us there were many others, including the Miwok and other tribes of

people who were stewards of the river and land beside it. On our walks we see deer, skunks, coyotes, fish, beavers, and many other creatures living in harmony with the people. Ours is mostly a happy community nestled beside the beautiful river. Of course we have concerns about flooding in our area and do very definitely appreciate the US Army Corps of Engineers (in fact, I worked for the USACE many years ago as a budget analyst on J Street and 13th downtown) shoring up our rivers to keep us all safe. We and many others in our community rely on the river to give us physical and mental relief from our busy, complicated modern society and question the massive damage that has been done in other areas of the river to prevent future flooding and what is evidently planned for our area. We also question if the bulldozing of up to 500 trees in our area is the best idea for keeping the levees from breaking up during high, fast waters. Through the good, caring people at AmericanRiverTrees.org I learned about Engineering With Nature An Atlas by Todd S. Bridges, PhD Senior Environmental Science National Lead for Engineering with Nature (I believe Dr. Bridges was or is an employee of the US Army Corps of Engineers). I really hope that those who are the planners of these projects will slow down a bit to read through Dr. Bridges' writing and study the work that has already been done in different areas to minimize risk from floods in a more natural way.

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 and that natural armoring would be lost and make us less safe. Destruction of natural vegetation worsens the effects of a warming planet.
2. The river's Wild and Scenic designation is compromised by a rigid, artificial shoreline.
3. Erosion is minimal in USACE's Contract 3B.
4. 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.
5. 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? 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.
6. Perhaps most important, 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.
7. Air quality is enhanced and mitigated with our beautiful river's trees and plants. That's huge!
8. Environmental justice: The proposed methods would eliminate locations that are accessible to disadvantaged populations. The environmental justice issue has not been adequately addressed in the environmental analysis.

Our requests: We need more information. The public cannot possibly understand, let alone intelligently comment, on the work to be done and how it affects resources they care about. Please! Do not proceed with your current plan until a much more targeted and less destructive alternative approach to Erosion Control Projects 3B and 4 is presented.

Sincerely,

Joan Rubenson

Homeowner and Nature Lover

Larchmont Riviera Community

joanndavid2@gmail.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:11 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

From: Alicia Etcheverry <aliciaetch@yahoo.com>
Sent: Wednesday, February 21, 2024 7:21 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

Dear US Army Corps of Engineers and Dept of Water Resources Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR particularly Contracts 3B and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

I enjoy walking along the American River Parkway and its woods for my health and well being. I value the trails, trees and all the wildlife along the river. My grandchildren frequent these trails with me and we use them also for quality time together.

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 the 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.

Please perform a more adequate 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.

Under the California Environmental Quality Act even where impacts will remain significant and unavoidable after mitigation CEQA requires that all feasible mitigation measures be incorporated. The draft SEIS/SEIR has not met that

requirement. The analysis of alternative methods for a much more surgical fine grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles long continuous set of launchable rock toes and trenches and adding this type of revetment EVERYWHERE there was no prior revetment introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amount of rocks, a hundred trucks per day, 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 making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock has not been evaluated for the possibility of asbestos containing composition such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truck loads per day of these rocks and the associated dust with a quarter mile of the school has not been addressed in the SEIS/SEIR

Air quality impacts are not addressed. The toxic air pollution impacts of diesel trucks used and staged near the Elementary School has not been addressed.. For California/CEQA diesel exhaust particulate matter is an identified carcinogen with a cancer potency value from the state office of Environmental Health Hazard Assessment (OEHHA) In the age group of 2 to 16 years old , children are 3 times more sensitive to a carcinogen like Diesel exhaust than adults. 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 if 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 the 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

Further, although construction of the Project would occur over two years, each site would have over 100 truck trips at each location that would travel through residential communities impacting the air with pollutants. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months OEHHA’s 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 residents to Diesel PM emissions that would result in significant health impact. This was not provided

The US Army Corps of Engineers 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, over generalized 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 even based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed stream and 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 especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data and fails to account for the erosion resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out of date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this a Project is necessary along this section of the American River. This calls into question whether the environmental

impacts can be deemed significant unavoidable when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks) and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction —followed by many more years of immature, isolated plantings - could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under prior contract suffered damage during the far-from-peak -design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to launch as designed, that the on site “planting benches” may be lost as well, exposing riprap and or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow through on prior and current requests for a commitment regarding repair and replanting in such events

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitats, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkways wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare wild vistas and aesthetics in this pristine area of the Parkway; and the long term loss of quality and access for recreation {hiking dog walking fishing picnics kayak and canoe access, paddle board access, bird and wildlife viewing , photography, solitude, a respite for mental health and many other uses} for miles along the rivers edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible for miles. The SEIS/SEIR fails to recognize, let alone mitigate for , the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails and rare shaded trails. These miles of habitat destruction threaten the 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, sycamore trees. Part of what ages this riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a state and federal wild and scenic river. In the 2016 GRR comment responses , the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clear cut. Will the Contract 3B area be clear cut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old—older than California and some older than our nation—which studies suggest will never again reestablish that longevity over jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

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 the area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations, This environment justice EJ impact has not been addressed in the environmental analysis.

The permanent impacts to recreation vegetation wildlife shaded fish habitat aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are significant unavoidable impacts CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used including the use of smaller equipment, and nature-based solutions (such as in place use of 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 an ore targeted analysis and approach.

The US army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts and develop more surgical, fine grained alternative methods for project subcomponents; then conduct a more 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.

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 USACE Contract 3B affect his protected and irreplaceable regional treasure for generations to come and should reflect the far greater care that this treasure deserves.

Thank you,

Alicia Etcheverry
Henry Preiss

[Sent from Yahoo Mail for iPad](#)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:11 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: teri@teriburns.com <teri@teriburns.com>
Sent: Wednesday, February 21, 2024 7:08 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; lPublicCommentARCF16@water.ca.gov
Cc: repamibera@mail.house.gov; repdorismatsui@mail.house.gov; SupervisorSerna@saccounty.gov; BellasE@saccounty.net
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments 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 horseback ride and hike along the parkway regularly.

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.

B | Such clear cutting would eliminate the diversity of vegetation in the area and create a loss of shade and enjoyment for many years to come as we wait for new growth, growth which will be different without older trees to protect incoming plants and animal species. The biodiversity of this beautiful area is at risk.

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:

- C I am concerned that re-vegetation of the banks will be long in coming and will be significantly different than the natural area we have come to know and love. Surely an “out with the old and in with the new” approach can be moderated while still protecting the riverbanks. At least some of the heritage trees need to be preserved.
- Rip-rap can be done less destructively as well. Some areas remain eye-sores for many years. Others can be planted and become almost invisible while still protecting the banks. I need to be re-assured that your plan is for an esthetically pleasing, habitat enhancing and functional project.
- D I am concerned as well about the many interconnected species living in this area. Are we cutting off wildlife corridors? Removing habitat for threatened species? Encouraging inter breeding due to limited access to other animals? As it is, high levels of noise and vibrations will disturb natural animal behaviors of breeding and feeding. This clear cutting will do much more of that and risks driving species from the area. I hope this issue can be better addressed before construction begins.

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.

B Teri Burns

teri@teriburns.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:10 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Michael and Gay Dittrich Jones <h2ogay@pacbell.net>
Sent: Wednesday, February 21, 2024 7:01 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

Before getting into detail about the draft SEIS/SEIR, I need to state that I have a very low confidence level in the Corps for remediation irrespective of the particular project.

One example is the work already done around River Park and CSUS. A fully functioning riparian habitat was destroyed and the scene now resembles a Saharan type landscape with dirt in lieu of sand.

A second example is the reventment by S.A.R.A. Park which was never finished. The bank was covered with flora, but the access area/staging area was never repaired. To this day it is still a scared dirt and clay road instead of a small pedestrian trail with landscape on both sides.

A third example is the staging area for levee replacement at Gristmill. Several hundred trees with accompanying understories were removed, including heritage oaks. Around half a dozen small trees and maybe a half dozen bushes were the only replacements for that huge destruction of a section of the American River Parkway. It is woefully inadequate to serve as remediation.

The cumulative effects of this lack of restoration on projects is severe and needs to be addressed.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on

the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an

outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Gay Jones

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:09 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Will Schaafsma <willschaafsma@gmail.com>
Sent: Wednesday, February 21, 2024 6:52 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR)
Comment Recipients:

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.

It is unfathomable to me that there are not erosion mitigation options that would preserve the unique natural features of the bank. The natural state of the bank already provides significant protection. The bank provides homes to wildlife and recreation to thousands of Sacramento residents.

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.

Will Schaafsma

Resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:08 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Michael and Gay Dittrich Jones <h2ogay@pacbell.net>
Sent: Wednesday, February 21, 2024 6:31 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me. I live near the river and I visit the parkway daily.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a

much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The

modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not "less than significant" nor are they "mitigated to less than significant". When there are "significant unavoidable" impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the "Crown Jewel of Sacramento". In 2012 it was designated a "Regional Treasure". The Contract 3B actions move into a zone designated a "Protected Area" under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Gay Jones

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:07 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: christine norman <czarina1107@comcast.net>
Sent: Wednesday, February 21, 2024 6:19 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

1 My husband and I live 2 blocks from Larchmont park and therefore 2 blocks from the American River. We bought our home almost 8 years ago and feel that we are lucky to live in this neighborhood and especially along this river. We enjoy living close to downtown but being able to walk 2 blocks and be in a very different environment. The large old trees along here are so beautiful any time of year. If you've never walked this section I invite you to please see for yourselves.

2 I'm not an engineer or a scientist but I've listen to the 3 presentations we were able to join on zoom and what you are proposing doesn't seem to fit this section of the river. We've walked this many years now through all seasons and have never seen destruction that would warrant removing all the current vegetation. I'd like the Army Corp of Engineers to relook at this project and use a nature based solution if there actually needs to be work done. Once you destroy this area it will be decades or longer before it recovers.

Sincerely,
Christine Norman

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:07 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Re: Comments on SEIS/SEIR for Lower American River Erosion Work - Levee Certification and Proposed Work that Makes Us Less Safe

From: MHI Gtpr <mhigtpr@gmail.com>
Sent: Wednesday, February 21, 2024 5:28 PM
To: Bill Brattain <bbrattain@hotmail.com>
Cc: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; barbaraleary@comcast.net; Susan_Rosebrough@nps.gov; BellasE@saccounty.gov; SorgenKC@saccounty.gov
Subject: [Non-DoD Source] Re: Comments on SEIS/SEIR for Lower American River Erosion Work - Levee Certification and Proposed Work that Makes Us Less Safe

Engineer Brattain's coherent, logical analysis warrants immediate attention.

1 To ignore this is like proceeding with surgery to amputate a limb that has no vascular compromise on ultrasound, merely because it was scheduled, and there is good insurance to ensure payment.
We deserve due consideration for the safety of our community and region, and, more importantly before the sacrifice of irreplaceable endangered habitat and multiple species.

2 The risk of such loss, compounded with admitted exceeding EPA standards for dust, diesel, noise of heavy equipment anticipated to be needed to be brought in, in as yet undefined locations or manner, represents far greater RISK than any anticipated BENEFIT that may be realized by this misadventure.

In addition, the increased heat island effect, coupled with loss of air scrubbing green space, will further worsen our vulnerability to toxic air pollution long after the work is done and the machines have trundled on to their next sites of mass destruction.

3 The climate impacts of warmer water, habitat loss will most likely result in complete implosion of the natural life cycle of the beleaguered salmon populations and other fish that normally enjoy the cool shady banks of the American River.

I stand in complete agreement with these concerns and will be submitting additional documentation regarding the significantly adverse public health impacts.

There are many other vulnerable communities and areas where the substantial financial resources earmarked for this project, could be better directed for overall regional flood control, with far less adverse, permanent environmental impacts.

It would be fiscally irresponsible to proceed with paying for this costly intervention that is not needed, and that will leave us at greater risk, suffering significant losses, for generations to come.

We are hopeful for your careful and thoughtful consideration of the numerous concerns being raised, as per your indicated process, and look forward to hearing your long awaited responses and explanations.

In the end, as engineers, Logic must prevail over politics, and in this case, a win win is easily in site if those committed to truth and best outcomes apply their skills towards the greater good that could and should be achieved.

Thank you for your consideration of this matter.

Sincerely,

Lisa Merritt MD
Executive Director, MHI

On Wed, Feb 21, 2024 at 3:58 PM Bill Brattain <bbrattain@hotmail.com> wrote:

Dear Army Corps, DWR, and CVFPB,

The attached PDF file contains my seventh (and I believe final) set of comments on the Draft SEIS/SEIR for the planned erosion work along the Lower American River under Contract 3B. Please review and respond.

Thank you,

William Brattain, P.E.

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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

2443 Fair Oaks Blvd #168
Sacramento, California 95825
Office: 941-706-3362 | Fax: [941-225-8198](tel:941-225-8198)
www.the-MHI.org | [Facebook](#)

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:06 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statment?Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices.

From: Ken Poelman <kenp@poelmaninc.com>
Sent: Wednesday, February 21, 2024 5:22 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] FW: Comments Regarding American River common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statment?Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices.

Dear US Army Corps of Engineers (USACE) and the Department of Water Resources(DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

A I do not support the use of a vacant lot on Crondall dr. this is in a residential neighborhood with allot of kids and the roads currently are falling apart , we don't need any more traffic and the owner has expressed his desire not for his lot to be used, he is currently evaluating design of a new home.

B I do not support the extra traffic on American River drive or Crondall during the days when Rio American and Jesuit ae in school

C Who do we contact when our houses or our pools get damaged because of all the heavy trucks, we had severe damage before and I hear that the garden highway pools are getting repaired because of all the levee work?

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 the Contracts 3B and 4, until a much more TARGETED AND LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

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The decision to use a mile-long grained approach are not presented. Such alternative methods would result in a far less environmental damage.

The decision to use a miles-long continuous set of launchable rock toes and trenches and adding this type of “revetment” EVERYWHERE there was no prior revetment- introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to the roads and levees, putting equipment staging areas in parks, in residential areas and besides elementary schools, and increased need for mitigation and the unaccounted for loss of additional trees to to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it important for the public to know the full loss of trees of the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented tat could have very dfferent and less significant impacts.

Further, the use of jagged quarry rock from unspecified sources 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 oif such rocks and the associated dust within a quarter mile of ta school has not been addressed in the SEIS/SEIR

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Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation report (GRR)there is insufficient evidence justifying the significance impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that the contract 3B, the data presented show no seepage risk for this zone. (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cut off 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 to the erosion-resistance 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. 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 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 of empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction- followed by many more years of immature, isolated plantings- could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of the prior Erosion Control Projects), will fare in high water flows, (We understand and recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledge concern that if high flows were to cause 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 flow-through on prior and current requests for a commitment regarding repair and replanting in such events.

Strongly appose 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 recreation use, aesthetic and visual character, and for staining the Parkways’ wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and to long-term loss of quality and access for the 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 the 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 small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is the vital to sustain our astonishing wildlife in a urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting 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 the “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 scenic rivers’ This ; any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said

they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the contract 3B be clear cut 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 the Contract 3B.

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When there are significant unavoidable’ Impacts, CEQA requires all feasible measures be used to reduce impacts. This 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 natural-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by National Park Service, that retain and integrate the existing trees and vegetation). These alternatives methods were not adequately evaluated.

This and All future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corps of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts and develop more surgical, fine-graded alternative methods for project subcomponents; then conduct on 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 USAG Contract 3B affect this protected and irreplaceable regional treasure for generations to come and should reflect the far greater care that this treasure deserves.

Ken Poelman

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Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Deedie Poelman <ddp@poelmaninc.com>
Sent: Wednesday, February 21, 2024 5:19 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A The American River Parkway and its woods and wildlife are extremely valuable to me. As a home owner along the 3B area for the past 25 years. My family has so many memories of this beautiful stretch of parkway. From 3 generations strolling the parkway to our daughters learning how to ride bikes, kayaking and watching wildlife. The Trail is also a very popular, healthy, environmentally sound alternative for commuting to work. Visitors often combine their Trail activities with shopping or eating, while others enjoy fishing or picnicking beneath a shady tree. Equestrian access to the paved trail surface is allowed only at trail crossings and bridges. Which the area the USACE plans to significantly change is a Equestrian access. How will they keep that ambiance that currently exists including the health factors??? What will the USACE tell they families that have dedication along the beautiful trail for the peace and mental space for a lost love one??? The vehicle traffic in the proposed area is already over compacted with vehicles. Especially around the Rio High School and Sierra Oaks Elementary School area. With the additional trucks traveling daily thru this area with the extra diesel pollution, not able to stop as quick as a regular vehicles especially with loads, and additional wear and tear on the streets ultimately our personal vehicles, what is the USACE plan to address all those concerns and ESPECIALLY keep our kids safe and healthy????? Why does the

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USACE want to disrupt a world-renowned trail based on some old reports?? Have you exhausted ALL current ways to handle this based on the already updated levee strengthening in this area and additional spillways at the dam? Weren't most of these trees in the area planted years ago based on your studies to assist if there was a 100 year flood? So why then what reports indicated we should now remove them and other rooted vegetation???

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are "necessary" for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed "unavoidable" impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of "revetment" EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to "access ramps" that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent

to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand

a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation --

which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Deedie Poelman

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 8:04 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

From: Tiffany Caudill <starsisterherbs@gmail.com>
Sent: Wednesday, February 21, 2024 5:20 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

The woods and wildlife are extremely valuable to me. I value the trails, trees and all of its inhabitants.

1 my family and I regularly walk the trails, enjoy the birds and animals, swim, wade and photograph this area. It is my home and I moved here to be near the river access and trails. Please consider not taking down the trees. they are sacred. Thank you.

Sarah
age 13

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Thursday, February 22, 2024 8:25 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Tearing down oak trees in American River

-----Original Message-----

From: Therese Collentine <t.collentine@gmail.com>
Sent: Thursday, February 22, 2024 8:11 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Tearing down oak trees in American River

[You don't often get email from t.collentine@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To whom it may concern,

I am a resident of Sacramento and am urging you not to tear down the living Heritage oak trees on the American River Parkway. While we do need flood protection, I believe there exists a smarter solution to this issue. Please consider forming a committee of citizens, environmental scientists and Army Corps of Engineers to problem solve this critical issue that will impact all of us for many years to come.

Please do not take out the Oaks along the American River Parkway. We need them for the health of our community. Let's come up with a more inclusive solution that addresses flood protection and environmental protection.

Thank you,
Therese Collentine

Sent from my iPhone

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Thursday, February 22, 2024 7:37 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

From: Zara Marfori <zara.marfori@gmail.com>
Sent: Wednesday, February 21, 2024 10:19 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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. 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 YOU in your role as county supervisors, as well as members of the SAFCA Board. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 10:30 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact

-----Original Message-----

From: Jill Noordzij <jillinsac@hotmail.com>
Sent: Thursday, February 22, 2024 9:37 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

A I have lived on this stretch of the parkway for over 20 years, and have enjoyed the beauty and peace of this beautiful green space in the midst of a busy urban setting. While on my daily walks, I see wildlife of all varieties. My husband and I have maintained our flood insurance policy this entire time, and recognize that all risks of living on a major waterway can not be entirely mitigated.

B While I understand there is a need to protect Sacramento from flooding, I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone

(neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Jill Noordzij

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 10:22 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Remaining Sacramento river encroachment
Attachments: Waterside levee @700 Riverlake Way 2 21 24.jpg

From: Bill McClendon <womcclendon@gmail.com>
Sent: Thursday, February 22, 2024 9:32 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Remaining Sacramento river encroachment

1 To whom it may concern,
Please see the attached image taken 2/21/24 @ the waterside levee looking down river adjacent to 700 Riverlake Way, Sacramento, CA 95831.

Why did USACE choose not to remove the remaining cross levee fence at this location ? The structure is 2 full fence lengths spanning more than 25' and terminates in the river.

Thank you for your response,
William McClendon

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 10:17 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Gods plan for trees on the American River Bike Trail

From: Patricia Weiner <weinerpat0129@gmail.com>
Sent: Thursday, February 22, 2024 9:29 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Gods plan for trees on the American River Bike Trail

Attention, This Is God Speaking

1 | The trees you wish to remove were provided by me! They were selected many years ago, and in some cases, perhaps centuries ago. They are there to provide shelter for my animal and bird friends. They provide food and protection from the weather. They have root systems that hold the earth in its place. If you remove my trees, what awful way are you going to use to keep the earth in place?

The beauty of this area of the American River Bike Trail will be lost for more than any of your life times. Your children and their children will be deprived of this beautiful area. Your children and their children and future generations will not want to go to this area to have a pleasant day.

2 | One of Sacramento's attractions is the American River Bike Trail. It's one of the best in the whole United States. People travel to Sacramento because of this bike trail!!! You have already destroyed the trail north of the Guy West Bridge at Sac State. Now you want to make a continuation of that ugliness!! HOW DARE YOU!!!!

3 | In today's world of inventions, can you not find another solution??????
I employ you to search further!!!! There is a better way!!!!

GOD

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 10:16 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Contract 3B North & South Project

-----Original Message-----

From: Jacquelyn Cotter <cothulio1@gmail.com>
Sent: Thursday, February 22, 2024 9:28 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Contract 3B North & South Project

1 | This needs more appropriate analysis on environmental impact and much more public involvement before the river banks are so denuded of native growth and so many heritage trees! As a Sacramento native I have enjoyed the parkway and hope to have much of it still here for future generations despite the need for protection from flooding.

Jacquelyn Cotter
Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 10:15 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] public comment re: vegetation removal along American River

From: Russell Croel <rcroel@comcast.net>
Sent: Thursday, February 22, 2024 9:27 AM
To: PubliCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] public comment re: vegetation removal along American River

I want to echo what the American River Trees organization says: *there must be a better way!*

Removing all that vegetation from the banks of the American River will be extremely damaging aesthetically and, even more important, ecologically. Riparian zones are crucial to natural systems in so many ways. They are also important to human well-being by providing natural water-filtration and purification services.

1 The riparian zone along the American River is a treasure and needs to be protected. Must all that vegetation be destroyed? This approach seems short-sighted.

Now more than ever, nature's needs to be given equal priority to human needs. We must stop going to war with nature. It's imperative that we responsibly manage each and every last acre of natural space on this planet.

This current plan seems irresponsible. There must be a way to better balance the needs of flood control and preserving nature.

Russell Croel
Folsom, CA

February 22, 2024

To: U.S. Army Corps of Engineers, Sacramento District
 Attn: Mr. Guy Romine
ARCF_SEIS@usace.army.mil

CA Department of Water Resources
 Attn: ARCF SEIR PublicCommentARCF16@water.ca.gov

Subject: Comments Regarding the *American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA Supplemental Environmental Impact Statement / Subsequent Environmental Impact Report XIV* | State Clearinghouse # 2005072046

Dear United States Army Corps of Engineers, Central Valley Flood Protection Board, and Sacramento Area Flood Control Agency (collectively “the Army”),

Intro

This comment letter specifically focuses on the project segments for American River Erosion Contracts 3B and 4B, being implemented by the Army. This comment letter will not articulate all of the problems with the project, other commentors will no doubt also point out additional flaws.

This project is not needed, and I oppose it. I have serious concerns with the proposed project and the environmental analysis of the December 2023 draft SEIS/SEIR XIV and supporting documents. The SEIS/SEIR shows this project is significantly deficient in many ways.

The American River Parkway as it presently exists is extremely valuable to me, as it is for people in the Sacramento region and outside of Sacramento. For example, I have a co-worker who comes to Sacramento several times a year from Southern California. I mentioned this project to him, and the impacts so far performed on the banks of the American. As cyclist, he said he has ridden his bike at least 10 times many miles on the American River Parkway; he does not want to see it denuded.

No Notice of the Project

You might wonder why weren't these comments heard earlier? Because there has been no notice to the residents and the community at large about this project. I just learned of the project in early February 2024, from a friend who lives in East Sacramento. For example, we live on American River Drive at the Moffa: Way intersection. This is dead center of the 3B planned haul route. We have lived here since January 2014 [and in the neighborhood since 2000 (Latham Drive)]. The Army did not provide any notice of this project to the residents and home owners. There were no letters mailed. There were no doorknob hang tags. Nobody went door to door. The Army did not set up tables on the American River Parkway for parkway users to learn about the project and ask questions. Whatever notice the Army thinks it did, it was completely inadequate.

2 Additionally, it is unreasonable to issue 1,700+ pages of draft SEIS/SEIR and appendices three days before Christmas 2023, and expect the general public to be able to read and understand it and meaningfully comment within 45-days.

There is no rush. The Army should withdraw the project, and do honest, transparent, and extensive notice of this project. It is what is required and what integrity calls for.

Stated Need for the Project is Sorely Lacking

3 The record lacks sufficient evidence or justification for undertaking this aspect of the project. This is a fatal flaw of the draft SEIS/SEIR, and the ACOE and state agencies need to go back and justify why this aspect of the project is needed in the 3B or 4B Contract areas. Need is not sufficiently articulated, thus making this aspect of the project an arbitrary and capricious government action.

The Army may generally say “Sacramento” is a flood risk. It is true there may be some places where flooding is a concern. However, any specific risk at the 3B and 4B Contract areas has not been demonstrated in the draft SEIS/SEIR or supporting documents.

4 Also, this project proposes to add rock to the bottom of the riverbank in the 3B Contract area and other areas, but the SEIS/SEIR and supporting documents do not sufficiently justify why this “solution” is needed at the 3B Contract location. This is a “solution” looking for a problem; a problem which does not exist.

5 There was no public outcry for this project. There was no public demand. So who called for spending of over three hundred million dollars on this project? [\$305,340,000; page ES-1]

Wildlife Corridors Eliminated

The ACOE and the state agencies have zero appreciation that the banks of the American River serve as wildlife corridors. In fact, the December 2023 SEIS/SEIR does not even use the term wildlife corridor, or even discuss the concept. This is a fatal flaw of the document.

6 The Army has now bisected the American River into upper and lower halves. The complete denudement of the riverbanks around the Fair Oaks Drive/H Street Bridge, which are wildlife corridors, now expose to harm any deer, coyote, raccoons, skunk, turkey, and other birds and animals who dare to traverse these banks. Turtles, river otter, fish, birds and other wildlife can no longer use these banks for safe passage, shelter, reproduction, or feeding.

This was not explained or described in the SEIS/SEIR documents, that the Army was going to permanently bisect wildlife movement along the American River into two halves.

The Army might say “it’ll grow back someday” – but it will be hundreds of years for the trees and vegetation to look like the current wildlife corridor. And such a retort would be disingenuous because the Army’s goal for this project is to not return the banks to baseline; the goal is a very different landscape.

There is no scenario where the denudement of these banks is justified. How could this have been thought to be acceptable and then approved by any of the state or federal trustee agencies? As demonstrated, the Army is not capable of nuance and prudence.

The SEIS/SEIR fails to provide any mitigation for this injury. That is a fatal flaw of the documents. What is the mitigation for the complete elimination of the wildlife corridor? There are no other acceptable alternative wildlife corridor options – through the neighborhood streets?

Failing to discuss this impact – elimination of wildlife corridors – negates the validity of the December 2023 SEIS/SEIR. It needs to be rescinded, and revised for accuracy and honesty.

Wildlife Impacts Generally

The impacts on habitat and wildlife are consistently understated in the draft SEIS/SEIR. For example, the document says the elimination of the habitat will be “temporary”. (e.g. sec. 4.5.1.2.2, page 4-187) This is not true. It will be permanent. It should be described that way. The document is full of examples like this. The Army might think mitigation makes up for this loss, but the loss in situ is an actual permanent loss, not temporary. The document should be withdrawn and rewritten to be truthful, accurately describe the actual impacts in situ. This is a fundamental flaw of the document.

It also says the construction activities “could” interfere with the movement of wildlife species. (4-187) Really, “could”? It is unbelievable that this characterization passes for acceptable. It is an absolute certainty there will be interference with movement – the Army will destroy many acres of habitat and vegetation. Of course the affected wildlife will move (or be killed in the process). Or wildlife will be unable to move through the disturbed area and will go somewhere else. Have integrity, be honest about the impacts. This is a fundamental flaw of the document; it needs to be revised to truthfully and accurately describe the actual impacts.

The record fails to justify the benefits of the project outweigh the permanent destruction to the Parkway. What is provided is lacking. The documents do not clearly articulate in any meaningful way how or why the alleged benefits are worth the permanent destruction. Many of the trees have been there longer than many of the European/“white”/non-native settlers have been in the area. The intent of the project is that the destroyed areas not grow back. It will take hundreds of years for any mitigation grow-back to approximate the current state of the habitat.

Haul Route Exposures

The draft SEIS/SEIR indicates this will be a four year project in the 3B, 4A and 4B areas. (page 2.1-8) The stretch of American River Drive where we live, between Howe Ave and Watt Ave, along with Kadema Drive and University Ave, will be a haul route beginning sometime in 2024 and ending sometime in 2027 – four years. This will expose the residents to increased traffic, increased vehicle air pollution, and increased noise for at least four years.

12 As discussed earlier, there was no notice to affected residents and property owners that the streets where we live would be haul roads or about these exposures for two years. Explain this to the children who live here.

The SEIS/SEIR fails to include any mitigation or compensation measures for the affected residents and owners. If the project occurs, this will be a taking without just compensation, among other claims; it will expose the Army to litigation.

Oak Meadow Park Closure Unlawful

The draft SEIS/SEIR shows Oak Meadow Park as a staging area, and says the Park will be closed the entire time of the project. (e.g. page 3-33, Figure 3.5.2-6)

13 However, the Army asked the Mission Oaks Regional Parks District (MORPD) whether Oak Meadow Park could be used for staging, and the answer was “no”. MORPD said the Park cannot be used for staging. There is no evidence in the record that this use of Oak Meadow Park is approved. This will be an unlawful occupation, and uncompensated taking.

The Army has no authority to unilaterally take over a county park for multiple years for this project. The draft SEIS/SEIR fails to state how it received alleged approval to use Oak Meadow Park for staging, considering that the Army was told “no”.

14 Additionally, there was no notice to the users of Oak Meadow Park that it will be closed for multiple years. The Park isn’t just used by people who live near the Park, people come from out of the area to use the Park. There were no signs. There was no table staffed by project representatives, who could be asked about the project. There were no letters to the neighborhood residents, or users who live out of the immediate area around the Park.

Additionally, there is no evidence in the record that the Army received approval to use University Park or Glenbrook Park River Access for staging.

15 There is no evidence in the record of mitigation for the closure. No mitigation is offered to the County itself or the nearby residents or any other regular users of Oak Meadow Park, University Park, or Glenbrook Park River Access.

No Action Alternative Not Seriously Considered

16 The No Action alternative is not adequately considered in the SEIS/SEIR and supporting documents. There is general lip service, but it is not honestly considered. As previously stated, there was no public outcry for this project. There was no public demand. No Action is a legitimate – and preferable – option to not do the 3B and 4B Contract components of the project.

People knowingly chose to live in the 3B and 4b Contract areas – areas that could potentially flood under only extreme circumstances. It is a very rare risk they accept, in exchange for the daily benefit of living near the American River Parkway *as it presently* exists. The SEIS/SEIR fails

to seriously consider this valuation at all.

17 The levies are in good condition. The proposed rock project is at the bottom of the river; it is not a strengthening of the levies. The solution does not address the alleged risk. There is a complete disconnect between the alleged risk and the intended “solution”; the record does not support the project at 3B and 4B Contract areas.

18 The money earmarked for this project could be better spent on other societal concerns, such as homelessness. Or border security. Or education. Or support of Ukraine.

Mitigation Not Sufficient

19 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. [i.e. CA Public Resources Code § 21081; 14 CCR § 15126.2(b)] The draft SEIS/SEIR has not met that requirement. The analysis of alternatives of much more nuanced and selective approach to work – with less environmental impacts – is not presented.

Climate Change

20 The SEIS/SEIR says “... implementing the project would increase the likelihood that the flood management system could accommodate future flood events because of climate change. The Proposed AcMon would improve the resiliency of the levee system with respect to changing climatic conditions, potentially reducing exposure of property or persons to the effects of climate change.” (page 4-147)

However, the draft SEIS/SEIR does not actually describe how climate change poses a risk of flooding on the American River. Thus, the above statement is unsupported.

The California Department of Water Resources says models show more rain will fall, instead of snow. [[Climate Change Program \(ca.gov\)](#), accessed 2/19/2024] The draft SEIS/SEIR fails to describe how a prediction of more rain and less snow pack justifies the proposed modifications to the American River banks. Again, the need for this project has not been justified.

21 Additionally, the draft SEIS/SEIR does not analyze the removal of the trees and vegetation in the context of climate change. More trees and vegetation are needed to fight climate change, not less. The ACOE clearly does understand or appreciate this. Otherwise this project either would not occur or at least the impacts would be far more nuanced.

The Army is Untrustworthy

22 The American River Parkway is designated both a State and National Wild and Scenic River. The American River Parkway is Sacramento’s crown jewel. But the Army is not treating it with the respect that is due. The Army is going to destroy it. How do we know? Just look at the Army’s work along the north and south banks of the American River in the area of the Fair Oaks/H Street bridge. Each bank is now completely denuded. There is zero vegetation. Every tree, bush, shrub, hedge, and blade of grass is gone. Clearly the Army does not know how to perform a

nuanced, selective, protective, and respectful project. Army: Be All You Can Be, Destroy All You Can Destroy.

The April 2022 SEIR/EA

The April 2022 SEIR/EA for American River Watershed Common Features, Contract 3A describes impacts to the vegetation and wildlife, fisheries, and visual resources as “short term”. (pages ES-3, 4) This is not short-term destruction. It will take hundreds of years for the river banks to return to baseline prior to destruction. This is a lie in the document.

23 The SEIR/EA says after “mitigation” for these impacts will be less than significant (“LTS”). (pages ES-3, 4) It is arrogant for the Army to think “Plant Trees On-Site” will quickly return the banks to baseline. (.pdf page 8) It will take hundreds of years for the river banks to return to baseline prior to destruction. Another lie in the document.

The SEIR/EA says “retain” and “protect” trees. (page ES-4) Every tree is gone. No tree was retained. No tree was protected. Another lie in the document. It inconsistently says this is significant and unavoidable (“SU”). The SU designation tips the hand of the Army – there was and is no intent to “retain” or “protect”. Again, a lie.

The SEIR/EA also says “avoid” and “minimize” effects of nesting birds. (.pdf page 8) Every tree and bush is now gone. That’s not minimize and avoid; what occurred was complete eradication. Another lie in the document.

The SEIR/EA also says there will be measures to “avoid” and “minimize” effects on shaded riverine aquatic habitat. (page ES-4) All vegetation is gone. That’s not avoid or minimize. Another lie in the document.

24 Thus, it is clear, the ACOE and the state agencies cannot be trusted to implement the 3B and 4B Contract segments of the project, as written in the December 2023 SEIS/SEIR. The Army should rewrite the April 2022 SEIR/EA and the December 2023 draft SEIS/SEIR to honestly and accurately describe what the Army will do. Not downplay. Not fudge. Not try to be cute with words. Instead, draft these documents with integrity.

Ryan Todd
PatiTodd

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 10:03 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Parkway project

From: Polly Laporte <pollylaporte@gmail.com>
Sent: Thursday, February 22, 2024 9:01 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Parkway project

- 1 | I am against the plan to remove large areas of natural habitat from the American River parkway between Howe ave and Watt ave.
- This area is a beautiful natural setting that needs to be maintained in its current state.
- 2 | The plan that is being proposed is unhealthy for all the people using it and for the wildlife living there.

Polly LaPorte

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 10:02 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Tree removal on American River

From: Margaret Graf <mgraf@golygon.com>
Sent: Thursday, February 22, 2024 8:50 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Tree removal on American River

1 We strongly oppose the proposal to take out trees .
Margaret Graf
Allen Taylor
Fair Oaks Residents

Margaret "Marg" Graf
Outstanding Life Member
Sacramento Assn of Realtors Master's Club

Lyon Real Estate
[8814 Madison Ave.](#)
[Fair Oaks, CA , 95628](#)

Wana Hom
Call Marg

[\(916\) 698-9116](#) Cell
BRE# [08003623](#)

I have not and will not verify or investigate the information provided by third parties.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:59 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Project 3B on the American river

-----Original Message-----

From: Leendert Noordzij <leendertn@hotmail.com>
Sent: Thursday, February 22, 2024 8:29 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Project 3B on the American river

1 Hello, having witnessed the work the us army corps of engineers has done already downstream from my location, the
2 work that's scheduled to be done in my area worries me greatly. It's not the intended goal, or even part of the scope,
3 safety from flooding, but the size and breadth of the scope. What I've witnessed is fairly close to clear cutting the
existing banks, which can not necessarily be the only way to go about reaching the goal. Also, the amount of planned
traffic to achieve this goal will be a major disruption to any and all activities currently going on on a daily basis. My wife
and I, and our neighbors all enjoy the parkway each day, and not having access to it for as long as your project will be
going on is simply unacceptable. I hope the folks charged with the execution of this project will reconsider and proceed
with smaller less disruptive steps. Thank you.
Leen noordzij

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:55 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Steve Cippa <steve@stevecippa.com>
Sent: Thursday, February 22, 2024 8:15 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

This email is being sent with regard to the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A

We have lived within 1/2 mile from the Estates Avenue entrance to the American River Parkway for thirty-two years. Over the years my wife and I have walked, run, biked and explored there many hundreds of times. Often times accompanied by our daughters, and now our grandchildren. It has served as an integral part of our lives.

B

We do not support the draconian 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. Further, we find the lack of public notice and input astounding.

We are writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with any of the proposed subcomponents of Contracts 3B and 4, until a much MORE TARGETED, LESS DESTRUCTIVE and PUBLICLY INVOLVED approach to Erosion Control Projects 3B and 4 is presented.

We do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable”

impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation

Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, we believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

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.

We strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

We STRONGLY object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the

INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

We 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.

We object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Steve Cippa, Susan Cippa and Family

Generational Arden Park Residents

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:49 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] WILD AND SCENIC RIVER??

From: Jerry Jagers <jagers@gmail.com>
Sent: Thursday, February 22, 2024 8:01 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] WILD AND SCENIC RIVER??

1 How can you do this to a WILD AND SCENIC RIVER?

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:48 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Increased need for water rescue resources? Other properties for staging consideration? Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental I...

From: Cynthia Albrecht <cynthiasdesign@icloud.com>
Sent: Thursday, February 22, 2024 7:52 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Jonah.Knapp@cvflood.ca.gov; BellasE@saccounty.net; SorgenKC@saccounty.gov; Susan_Rosebrough@nps.gov; Barbara_Rice@nps.gov; hbwillia44@gmail.com; RichDesmond@saccounty.gov; PatHume@saccounty.gov; SupervisorKennedy@saccounty.gov; SupervisorSerna@saccounty.gov; SupervisorFrost@saccounty.gov; Matthew.Ceccato@mail.house.gov; repamibera@mail.house.gov
Subject: [Non-DoD Source] Increased need for water rescue resources? Other properties for staging consideration? Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Repo...

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I also add two additional questions, one, whether or not the need for more water rescue personnel and equipment has been studied with the removal of these number of trees and the increased access to a bare shoreline along the river in this area. Two, this area already has a reduced number of parks per capita and you are purposing to remove access to one of the

largest ones in the area for over two years. There are nearby vacant or under utilized lots (like across from the Butterfield light rail station) that could be annexed and used without reducing community use of the largest park in the region.

The American River Parkway and its woods and wildlife are extremely valuable to me.

I moved to the Sacramento region from Colorado just over twenty years ago and choose to live near the American River Parkway (within two blocks of one of the access points) because I wanted to be able to spend consistent time walking, running, cycling, and exploring this beautiful parkway. In a lot of ways the American River Parkway was my children's first playground. One of our first memories of meeting neighbors involved geocaching along the shoreline. My kids often asked to go down to see the ducks and geese near the water. We also spotted beavers, river otters, occasional sea lion, scores of different birds, occasional coyote, rabbits, snakes, squirrels, and more. I wonder how the removal of all these trees will change or endanger the habitats for many of these animals.

As a parent who loves the great outdoors, natural habitats, and understands the dangers or risks of open waters, I sought to encourage my kids exploration and taught them the water could be enjoyed with the proper safety measures. Right now, there are limited places to access the shoreline due to the trees and foliage along the shoreline. I can't but help wonder what will happen with a naked shoreline with dogs that get away from their owners, young children that wander down there, or even just families who don't adequately understand the risks of open water swimming in the river. Some of the areas that will now be more accessible have very deep pockets of water not far from the shoreline. Has a study been done regarding an increased need for water rescue personnel and equipment in this area too?

Besides, the questions I raised in the previous paragraphs, I do not support the devastating methods being proposed to address potential streambank

erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been

meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than

significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective

effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river's edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities." Among the values noted was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees." Part of what makes this "riparian hardwood strip" so valuable for recreation is that "the riparian vegetation is carefully protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016

GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Cynthia Albrecht

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:47 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Tree removal

From: Kevin Hittle <albhittle74@gmail.com>
Sent: Thursday, February 22, 2024 7:42 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Tree removal

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

I find serious flaws with the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A *I strongly question whether this “potential bank erosion” work is necessary along this section of the American River. Scientific literature points to the fact that riparian vegetation **increases** bank stability (Abernethy and Rutherford, 2000; Easson and Yarbrough, 2002; Krzeminska et al., 2019; Ott, 2000), while denudation has the opposite effect (Cendrero et al., 2022). In addition, bankside vegetation decreases flow velocity (Valyrakis et al., 2021), and can decrease flood crests, as seen on the Salinas River in 2023 (CNRFC, 2023). Notably, on larger rivers like the American, it is large, established trees such as those proposed for removal which provide the greatest stability benefit while immature trees must be given time before providing stabilization benefits.*

B *The affect of the proposed clear cutting can neither be understated. Removal of the large established trees along the American River will increase water temperatures (McGurk, 1990), decrease or eliminate the qualities which led to the Lower American being designated a Wild and Scenic River in 1981 (American (Lower) River, n.d.). Alongside these factors, as Sacramento-area residents have noted in other areas where this work has already been performed, there is a great deal of wildlife disturbance--most significantly to the public, the fact that rattlesnake and coyote habitats have been disturbed. Displacement of these animals and increased interaction with humans will doubtless lead to an increased risk towards children and pets.*

C | *Next, this project exacerbates the negative noise, air quality, and recreational impacts Sacramento-area residents have been forced to absorb via the already completed USACE American and Sacramento River projects, U.S. 50 repaving, and UC Davis Medical Center expansion.*

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 fewer environmental impacts) are not presented.

The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.

The American River Parkway is often called the “Crown Jewel of Sacramento”. These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

*Kevin A. Hittle
Rapid City, South Dakota*

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:46 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Work to Protect People and the American River Parkway

From: Alan Dowling <alandowling1@gmail.com>
Sent: Thursday, February 22, 2024 7:34 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Work to Protect People and the American River Parkway

Dear Teams,

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. :

3 | - 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.

4 | 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.

- 5
- 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?
- 6
- We've also heard when the upstream dams are raised the cfm will be mitigated to the similar levels of what is stated for these works. Please advise?

Regards,

Alan

On Mon, Jan 8, 2024 at 1:04 PM Alan Dowling <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
- 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, 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.

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

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:35 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] RE: American River Parkway Erosion Projects

From: grass7685@comcast.net <grass7685@comcast.net>
Sent: Thursday, February 22, 2024 6:55 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: publiccommentarcf16@water.ca.gov; Jonathan Grass <jjgrass@gmail.com>
Subject: [Non-DoD Source] RE: American River Parkway Erosion Projects

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway is extremely valuable to me.

A We use the parkway daily and it is under attack from homeless camps causing pollution and trashing our environment and destroying the habitat to address a problem that does not really exist makes no sense. Plus, the enormous cost to taxpayers. I have seen what is being done down stream from us around the J street bridge and it is unbelievable to think that this is solving anything...it is just destroying the environment. I am in my 60's and the time it takes for this to grow back will not happen in my lifetime.

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:

[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]

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.

Douglas Grass

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:34 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Project from Howe Ave to Watt Tree

From: Nancy Eichhorn <nxe2417@gmail.com>
Sent: Thursday, February 22, 2024 6:34 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Project from Howe Ave to Watt Tree

To Whom it May Concern,

I just read an article in the Sacramento Bee about the intended destruction of 500 amazing trees along the American River to work on the levee system.

Intro I feel sad that this is the first I have heard about it and I do read the Bee everyday! And I walk those pathways everyday along the American River Parkway. I grew up on the American River Parkway--floating down the river, walking the river paths, riding the bike trail, picnicking etc. Those trees are gorgeous and functional. They provide shade and homes and aesthetic beauty as well as rooting into the ground to provide protection from flooding and the loss of substantial soil.

There has to be a better way to do the work without destroying 500 trees that will take decades if not more to recover.

1 If my small voice means anything, I ask you to reconsider the destruction of these trees and find alternative ways to do what needs to be done. There is always a Plan B and there are always other ways to reach the same conclusion. Staying stuck in one perspective is not always healthy in any situation.

Sincerely,
Nancy Eichhorn
Carmichael, CA

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:24 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: Laretta Johnson <lrojohnson@ucdavis.edu>
Sent: Wednesday, February 21, 2024 10:03 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 love living in Sacramento, particularly because of the rivers. The urban sprawl and increased channelization and desecration of these places, to me, is the biggest drawback of this beautiful spot in the valley. We have already done so much damaging reengineering of our environment, from the ways we have channelized and overdrawn rivers to installing excessive dams that block fish migration. The proposal here is one more project that would negatively impact the local ecosystem and wildlife habitat, trading vegetation's natural erosion control for a man made project that will remove trees, reduce shade cover, negatively impacting fish and other wildlife. While I understand that improvements need to be made and care about protecting Sacramento communities from devastating flooding, I urge you to consider lower impact projects, as well as projects that would move us toward coexisting with the natural landscape in a more reciprocal way.

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.

Sincerely,

Laretta Johnson

--

Laretta Johnson (she/her)

J.D. Candidate | Class of 2025

University of California, Davis School of Law

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:23 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

-----Original Message-----

From: Sarah Williams Kingsley <sewkingsley@gmail.com>
Sent: Thursday, February 22, 2024 5:48 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

My family and I visit the proposed work area regularly to bird watch, swim, and enjoy the natural beauty of the American River. It provides a much needed respite in our urban area. Access to flowing water is vital to our mental health.

This area has seen high water repeatedly over the last several years. Watching the natural landscape change and adapt has been fascinating and educational. The trees and landscape survive and thrive, as do the wildlife inhabitants.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the

Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Sarah Williams Kingsley
Sacramento resident

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:22 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Sharon Larkin <sharonesqe@yahoo.com>
Sent: Thursday, February 22, 2024 1:11 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

A I have grown up enjoying the parkway, the wildlife and woods for over 30 years. Please find a better way.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project. Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code §

21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis

overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Sharon K. Larkin

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:21 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Susana Rodriguez <rsustian@sbcglobal.net>
Sent: Thursday, February 22, 2024 12:14 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. The American River Parkway and its woods and wildlife are extremely valuable to me.

A I can tell you that the beauty this area provides on my weekly walks is amazing, not only to my physical health, but also my mental health. Being able to walk and view all of nature while getting my walk in. Seeing the wild turkeys, rabbits, different birds, big and small, deer, and other inhabitants of this area is what makes it so beautiful. And I would hate to see it all destroyed.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other

reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction – followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Susana Rodriguez

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:19 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

From: Nic Domek <nicdomek@gmail.com>
Sent: Wednesday, February 21, 2024 10:11 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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. 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! I personally grew up a few blocks from the American River Parkway near Watt Avenue and La Riveria, and exploring the river with our dog were a highlight of my childhood. I spent many hours running along the scenic trails, biking, filming home videos, or even going to see stinky dead fish during fish breeding season. From a young age, the Parkway instilled in me a sense of wonder and appreciation for nature that I carry with me every day. I want future generations to continue to have the opportunity to have similar experiences to me, which is why I am passionate that the erosion efforts be performed with great care and thought to the vegetation and animal life there.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to YOU in your role as county supervisors, as well as members of the SAFCA Board. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you.

Nicholas Domek

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:18 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Saving Sacramento's Trees

From: Karen Shahbandi <karenajun@gmx.com>
Sent: Wednesday, February 21, 2024 9:57 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Saving Sacramento's Trees

To ARCF Staff,

Intro I am wrting to tell you how very important the trees are to my life here in Sacramento. After food, water and air the environment, meaning the rivers and trees, hold the most essential quality of life.

The very reason I stay in Sacramento is to be near nature. The rivers and trees combined with good weather make this a perfect home for nature lovers.

1 Please do not destroy the American River Parkway or any other site where people can access the river.

Respectfully,

Karen Shahbandi

Retired Sacramento Public Library employee

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:17 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] PublicCommentARCF16@water.ca.gov

From: S Baker <6200sampson@gmail.com>
Sent: Wednesday, February 21, 2024 9:49 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] PublicCommentARCF16@water.ca.gov

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I OPPOSE the proposed project and have SERIOUS CONCERNS about the draft SEIS/SEIR environmental analysis.

I LOVE The American River Parkway. it helps me to walk near the river to calm down from my very stressful life.

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:

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Cindy Austin

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:16 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental SEIS/SEIR – 12/2023 Report & Appendices

From: Sherie Baker <srbrub@gmail.com>
Sent: Wednesday, February 21, 2024 9:45 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental SEIS/SEIR – 12/2023 Report & Appendices

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that would be eliminated. Removing trees may make us less safe.

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:15 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 SEIS/SEIR – 12/2023 Report & Appendices

From: Sherie Brubaker <srb_dwr@att.net>
Sent: Wednesday, February 21, 2024 9:42 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 SEIS/SEIR – 12/2023 Report & Appendices

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The American River Parkway is extremely valuable to me!!! My family and I walk near the river almost every day. This walk in nature has a calming effect.

I have lived near the American river for almost 85 years. I moved here to be near the river for the hiking and biking trails, the lush riparian environment AND the wildlife.

The proposed project will destroy all of that.

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Marcia Shultz

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:14 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental SEIS/SEIR – 12/2023 Report & Appendices

From: r m <rm_info@sbcglobal.net>
Sent: Wednesday, February 21, 2024 9:38 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
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- This part of the river is heavily used by the public for walking, swimming, fishing, kayaking, bird and wildlife viewing, and general enjoyment of natural features. There are many footpaths in the forest and beaches along the shore that are extremely important to the public. The Corps has not provided any detail as to what, if any, of our mature trees, footpaths, beaches, fishing access points, and other natural features will be preserved. Why should we think that the Corps will do anything different than at River Park, where all of these features such as mature trees, beaches, footpaths, etc., appear to have been destroyed? Sac State is used as a restoration example, but we know of no beaches, footpaths, fishing access points there, either. Why should we trust that 3B will be different when even the SEIS/SEIR does not address these issues?
- Installation of miles of angular rock (riprap) will make river access dangerous along large stretches of river, and will greatly impede swimming, fishing, and deployment of watercraft such as kayaks. This will be a permanent and significant loss of irreplaceable recreational amenities to the community that is not accounted for in the SEIS/SEIR, despite promises by the Corps in 2016 to address these significant issues.
- The permanent loss of mature trees, beaches, river access points, footpaths, and other recreational amenities is not “less

than significant” as stated in the SEIS/SEIR. The Corps needs to document these losses and redo the SEIS/SEIR to account for them, including proposals to modify the project where possible to minimize losses.

- The public has a right to know how specific recreational amenities will be affected by this project. The level of detail in the SEIS/SEIR makes it impossible for the public to see what will be done, and all we can assume is everything in 3B upstream of Watt Avenue on the south side will be ripped out like at River Park. The public has a right to know the details at this stage of review and should not be required to “trust” the Corps. We want the Corps to document and justify specifically which of our trails, trees, beaches, fishing access, and riparian forest must be destroyed to keep us safe from floods, and how much of that destruction will be replaced, versus what will be lost permanently given current design.
- 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 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 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 environmental justice issue has not been adequately addressed in the environmental analysis.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:13 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] OPPOSE & Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental SEIS/SEIR – 12/2023 Report & Appendices

From: Sherie B <srbmk@att.net>
Sent: Wednesday, February 21, 2024 9:35 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] OPPOSE & Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental SEIS/SEIR – 12/2023 Report & Appendices

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental SEIS/SEIR – 12/2023 Report & 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 OPPOSE the proposed project and have SERIOUS CONCERNS about the draft SEIS/SEIR environmental analysis.

A The American River Parkway is extremely valuable to me!!! My family and I walk near the river almost every day. This walk in nature has a calming effect.

I have lived near the American river for almost 70 years. I moved here to be near the river for the hiking and biking trails, the lush riparian environment AND the wildlife.

The proposed project will destroy all of that.

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)).

Air Quality... the construction will make already bad air quality worse. And so will removing the trees and vegetation.

We already lost the area from Campus Commons past paradise beach for the rest of my life.

We'll never see another lush riparian environment again in this area in my lifetime if this project goes forward as planned. It will take 30 years for the area to come close to being what it is now.

The levees were strengthened a while ago. Now you want to waste taxpayer money to destroy part of the American River 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 clear cut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

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.

Michelle Neely

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:12 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental SEIS/SEIR – 12-23 Report and Appendices

From: s b <srbinfo@sbcglobal.net>
Sent: Wednesday, February 21, 2024 9:26 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 SEIS/SEIR – 12-23 Report and Appendices

•

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

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Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

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.
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- 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.
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- 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.
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9. Environmental Justice (EJ):

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Thank you, Bozidarka Theodorovic

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:12 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: sherie b <sacblueslady@sbcglobal.net>
Sent: Wednesday, February 21, 2024 9:17 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

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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I have lived near the American river for almost 40 years. I moved here to be near the river for the hiking and biking trails, the lush riparian environment AND the wildlife.

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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.

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We'll never see another lush riparian environment again in this area in my lifetime if this project goes forward as planned. It will take 30 years for the area to come close to being what it is now.

The levees were strengthened awhile ago.

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 clear cut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

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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.

Marie Brubaker, 6200 Sampson Blvd, Sacramento ca 95824 916-383-6557

I hope you and your loved ones are healthy and happy.

Thank you

Sherie

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 9:12 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: s baker <sbrub@sbcglobal.net>
Sent: Wednesday, February 21, 2024 9:20 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

To: ARCF_SEIS@usace.army.mil

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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.

Harry Brubaker

From: [Natasha Cevalco](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, February 6, 2024 9:44:22 AM

Some people who received this message don't often get email from natasha.cevasco@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.

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.
Natasha

From: [Peggy Kennedy](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Subject: Corps of Engineers Contract 3B Seis/Seir Reports
Date: Friday, February 9, 2024 5:33:37 PM

[You don't often get email from krauskennedy1@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear President Jane Dolan:

1 | Please use your influence to encourage the Corps of Engineers to host an in-person workshop and public board hears while public comments are still being accepted regarding the Seis/Seir report on their plan Contract 3B, which will bulldoze two miles of American Riverfront on the Lower American River.

Yours truly,

Peggy Kraus Kennedy

From: [Jay D](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Subject: Stop the killing of our American River community stop Army Corps clearcutting.
Date: Saturday, February 10, 2024 9:09:36 AM

You don't often get email from jaydd1960@gmail.com. [Learn why this is important](#)

1 | Stop for Review. The army corp 3b 4a 4b contracts. Blindly bull dozing any section of a stretch of wild and Scenic river is reprehensible. Stealing this from the community who moved here for it is criminal. There are a bounty of highly educated industry professionals in the area speaking to all specifics.
Tia for your action
Jay Domeny

From: [john geibel](mailto:john.geibel@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: Monday, February 12, 2024 3:59:28 PM

[Some people who received this message don't often get email from jlgeib4@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 iPad

From: [Carol Clifton](#)
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, February 14, 2024 6:15:38 PM

[You don't often get email from caroljnc@sbcglobal.net. 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. Carol Clifton

From: [Jennifer Enright](#)
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, February 14, 2024 2:56:00 PM

[You don't often get email from jennifer.helm@att.net. 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.

Jennifer E. Enright

From: [Ewing, Nicholas](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Thursday, February 15, 2024 9:45:28 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.

I have lived on the American River here in Sacramento since 1964. I raft and kayak rivers around the world and always marvel at what an incredible natural river we have here. To be able to step out of an urban environment into what feels like wilderness at times and is full of wildlife is incredible. Before my retirement from the Department of Biological Sciences at Sac State I was able to commute by bike to campus and soak up that natural beauty and my wife commutes along if every day still on her way to work as a physician. Now that I am retired I am on the river every single day that I am home and in the last few days have seen bald eagles, otters, a bobcat, beavers, sea lions and a wonderful array of plants and birds. I touch bases with plants and trees that are like old friends. Some of them I hung rope swings from as a kid and that my kids did the same. Some out my back door were likely good size and loved indigenous people before John Fremont and Kit Carson made their way along the river. I watch the changing seasons with the changes in the plants and animals and the rising and falling of the river. I feel so incredibly lucky to have this wonderful river out my back door. Its accessibility for all of us in Sacramento is a gift. We don't have to get in our cars and drive far to experience a beautiful place. This river has instilled a love of the natural world in my children. At a time when we see the damage caused by climate change in wild areas everywhere this place is a sanctuary. With the work that is proposed the natural beauty of our beloved river will not recover for generations!

As a careful observer of the river I have watched all of the major flood events beginning with the high water of 1964. I have walked the banks and paddled at all but the very highest water levels (as an experienced big water rafter I am able to do that safely). I question the conclusion that removing the trees and replacing them with what may well be reduced to rip-rapped banks after high water events will protect us from flooding. It is clear that the trees that are in place provide a great deal of erosion protection—as the Corps recognizes since plantings are done specifically for erosion protection. Will the work like that done in the first phases below Howe Avenue be protective? If we have high water events in the years before plants become established it appears to me that we will be at risk. There is already significant erosion of the new work simply from moderately heavy run-off from rains! It seems the project area will be vulnerable for years.

We have invested massive amounts of money in modifying the spillway on Folsom Dam and now in raising it. Hasn't this work increased our flood protection sufficiently?

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Thank you,
Nicholas Ewing, Ph.D.
Professor Emeritus
Department of Biological Sciences
California State University, Sacramento

From: barbara.dugal
To: info@safca.org; Woertink.Amber@CVFPB; %20Chris.Lief@CVFlood.ca.gov
Subject: Meetings for Contract 3B and 4B
Date: Tuesday, February 20, 2024 12:20:12 PM

You don't often get email from babsdugal@hotmail.com. [Learn why this is important](#)

Intro My name is Barbara Dugal and I am sending this email to insist that the Army Corps of Engineers hold an in-person public meeting regarding the next phase of proposed levee work (Contract 3B and 4B) along the American River. As the Corps' local partners, SAFCA and the CVFPB, hold the ultimate responsibility for ensuring that the project's impacts on Sacramento's "crown jewel," our American River and Parkway, are thoroughly explained and justified to the satisfaction of the Sacramento community and the people of the State of California. I live near the Parkway and American River (Wilhaggin Neighborhood and Rio Americano High School) and use the trails and levees almost daily. I am so shocked at what was done at the River Park, Paradise Beach, H Street Bridge section and I do not want to see the same denuding of the trees and vegetative habitat further upstream. I almost cry every time I pass over the H Street Bridge. When I walked along the River Park area this past September, I had to turn around because it was so hot from the lack of trees and vegetation. While I am preparing comments on the SEIS/SEIR, I am also insisting that an in-person public meeting be held for this next phase of work. The upcoming Contract 3B and 4B envisions similar devastating impacts to areas of the River and Parkway between Howe Avenue bridge and Watt Avenue bridge, continuing a mile upstream of the Watt Avenue bridge to the vicinity of Mayhew/Rio Bravo Circle on the River's south bank, and Estates Drive on the north bank. Also, **please add my name and email address to all lists associated with this proposed levee work**, thank you for your consideration, Barbara Dugal

From: D"Augustine, Chavez@CVFPB
To: D"Augustine, Chavez@CVFPB
Subject: FW: REQUEST: Public Workshop for USACE Proposal for American River 3B Project
Date: Thursday, February 22, 2024 8:49:00 AM

From: Laura Hansen <laura@chillsacramento.org>
Sent: Tuesday, February 20, 2024 4:58 PM
To: Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>; Woertink, Amber@CVFPB <Amber.Woertink@CVFlood.ca.gov>
Subject: REQUEST: Public Workshop for USACE Proposal for American River 3B Project

Some people who received this message don't often get email from laura@chillsacramento.org. [Learn why this is important](#)

Dear President Dolan and Members of the Board and Staff:

RE: US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

Public Workshop Request:

- 1
 - Address this proposal and provide a 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 voiced at the USACE virtual public meetings, in comment letters, and at other public forums,
 - Respond to the subject matter experts who have shared detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding.

Do not push this through to avoid public outcry. You've already got public outcry – and for good reason.

2 This project is not listed on the Agenda for your next meeting on February 23, 2024. Extend the public comment period to help the public gain further understanding and support USACE in their above stated goal to communicate.

Keep the Army Corps of Engineers in alignment with legislation

3 The USACE has a long history of disregarding habitat and fragile ecosystems. Only through regulation and recent laws has the USACE been persuaded to preserve habitat. The U.S. Army Corps of Engineers (USACE) has a **complex history that intertwines with the development and sometimes degradation of natural habitats, especially in its efforts to control riverbank**

erosion. Over the decades, the focus of USACE's water resources development has shifted significantly due to changing societal values, political shifts, and economic constraints.

Initially, projects were primarily focused on irrigation, navigation, or flood control, but since the 1960s, there has been a growing emphasis on recreation, environmental preservation, and water quality. This shift was marked by the passage of several key pieces of legislation, including the **Wilderness Act (1964)**, the **Wild and Scenic Rivers Act (1968)**, and the **National Environmental Policy Act (1969)**, which underscored the nation's growing concern for environmental issues.

Despite this shift, USACE's role as a major developer of water resources has at times placed it at the center of criticism for environmental degradation.

4 **Why would you agree to 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 **Why wouldn't you favor erosion control projects to have a more targeted analysis and approach?** Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved.

6 **Why would you agree to the destruction 200-300 year-old heritage oaks?**

7 **Why would you choose your legacy to be the loss of your community's long-term loss of quality** and access for recreation and respite for miles along the river's edge, including the loss of dozens of unofficial, but much-loved access trails, equestrian and rare shaded trails?

8 **Why would you choose to be responsible for destabilizing the wildlife habitat for this riparian ecosystem?** 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.

9 **Use your power to impose 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.**

Public Workshop Request:

10 **Location:** The O.W. Erlewine Elementary School has been suggested as a meeting location.

Organizing Assistance: Supervisor Rich Desmond has promised to assist in the organizing this workshop.

Do what you know is right. Leave a legacy you can be proud of.



Laura Hansen

She/Her/Hers

Board President

Chill Sacramento

916-247-5871 (cell)

laura@chillsacramento.org

www.ChillSacramento.org

Peace Within Us. Peace Between Us.

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From: [Gisla Dewey](#)
To: [Woertink, Amber@CVFPB](#); [dpoggetto@arpf.org](#); [rstork@friendsoftheriver.org](#)
Subject: USACE Project 3B
Date: Thursday, January 25, 2024 3:41:51 PM

You don't often get email from gislahdewey@yahoo.com. [Learn why this is important](#)

Greetings,

Please note the e-mail that I sent to a number of elected officials (national and local), as well as national and regional park staff I hope that you will join the citizens in persuading the Corps of Engineers to find a less destructive means to the erosion control project.

"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.

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well as members of the SAFCA Board. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you.

Gisla Dewey

From: [mark andrews](#)
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, February 1, 2024 10:11:17 AM

[Some people who received this message don't often get email from markal186@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.

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Thank you.

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Thursday, February 22, 2024 1:29 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Oppose the American River parkway project

-----Original Message-----

From: Melissa Gates <melissa.gatesdvm@gmail.com>
Sent: Thursday, February 22, 2024 1:00 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Oppose the American River parkway project

[You don't often get email from melissa.gatesdvm@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

1 | I am writing to express my strong opposition to the destruction of valuable riparian habitat along the American River.
This is unnecessary and will cause irreparable harm to valuable and necessary habitat for wildlife.
Melissa Gates

Fwd: Delta Stewardship Council staff forget concerns expressed by local agencies about Delta Levees Investment Strategy

Deirdre Des Jardins <ddj@cah2oresearch.com>

Thu 2/22/2024 1:21 PM

To: Selvamohan, Selvaratnam@CVFPB <Selvaratnam.Selvamohan@cvflood.ca.gov>; Dolan, Jane@CVFPB <Jane.Dolan@cvflood.ca.gov>

Cc: DWR CVFPBQuestions <Questions@CVFlood.ca.gov>

Some people who received this message don't often get email from ddj@cah2oresearch.com. [Learn why this is important](#)

Hello

FYI -- The Delta Stewardship Council staff seem to have totally forgotten the concerns expressed by the Central Valley Flood Protection Board and local agencies about the failure of the Delta Levees Investment Strategy to prioritize investments in the State Plan of Flood Control levees on the Sacramento River, as shown by yesterday's presentation to the Delta Independent Science Board.

As you know, it's a major issue because there is already inadequate funding for maintaining primary Delta levees and upgrading them to deal with sea level rise.

I sent this followup email to the Delta Independent Science Board, the Delta Lead Scientist, and DSC Chair Virginia Madueno. Trying to let the folks who raised concerns in the Delta Levee Investment Strategy hearings know as well.

----- Forwarded message -----

From: **Deirdre Des Jardins** <ddj@cah2oresearch.com>

Date: Wed, Feb 21, 2024 at 12:36 PM

Subject: Concerns expressed by Delta local flood agencies at August 2021 DLIS hearing

To: Delta Independent Science Board <disb@deltacouncil.ca.gov>, lisamarie.windham-myers@deltacouncil.ca.gov <lisamarie.windham-myers@deltacouncil.ca.gov>, <erin.mullin@deltacouncil.ca.gov>, Madueno, Virginia@DeltaCouncil <virginia.madueno@deltacouncil.ca.gov>

At the August 2021 hearing on DLIS, the DSC Executive Director said that the concerns expressed by the Central Valley Flood Protection Board, the Central Valley Flood Protection Association, Central Delta Reclamation Districts, and Gil Cosio could be addressed going forward. But the presentation today by the Delta Stewardship Council staff showed that these concerns have been completely forgotten. Further, none of the local flood agency folks who expressed concerns were asked to present to the Delta Independent Science Board. This fails to give adequate information to the Delta ISB for independent oversight of the Delta Stewardship Council.

The characterization of the DLIS as prioritizing "risk reduction" is also fundamentally obfuscatory. The Council's decisionmaking documents showed that the Council did not choose the option that would have prioritized protecting lives and property. The decisionmaking instead chose the option that would prioritize protecting statewide interests -- Delta export water supply and ecosystem restoration.

You can see this in the categorization of restoration of Grizzly Island and Hasting Tracts as "very high" priority, above that of most levees protecting Delta legacy communities.

<https://deltacouncil.ca.gov/pdf/dlis/2024-01-02-closeup-extent-1.pdf>

<https://deltacouncil.ca.gov/pdf/dlis/2024-01-02-closeup-extent-2.pdf>

<https://deltacouncil.ca.gov/pdf/dlis/2024-01-02-closeup-extent-3.pdf>

This is my blog post on the August 2021 hearing (with a transcript of my concerns about protecting lives and property in Delta legacy communities.)

[Revised Delta Levees Investment Strategy approved over objections by Delta stakeholders](#) The DLIS maps continue to fail to even show the location of Delta Legacy Communities.

Transcript of comments by Melinda Terry of the Central Valley Flood Protection Association, Dante Nomellini Sr. representing Central Delta Reclamation Districts, and Gil Cosio, the levee engineer for North Delta Reclamation Districts.

[Comments of Delta stakeholders on revised Delta Levees Investment Strategy](#)

The table below (updated from our 2019 brief) shows actual conditions of the levees protecting Delta legacy communities.

Hazard Level definitions are from the Lower Sacramento River/Delta North Regional Flood Management Plan, July 2014. Available at <https://www.yolocounty.org/home/showdocument?id=28753>

When water reaches the Levee Assessment Tool assessed Water Surface Elevation:

- Hazard Level A –low likelihood of either levee failure or the need to flood-fight to prevent levee failure.
- Hazard Level B – moderate likelihood of either levee failure or the need to flood-fight to prevent levee failure.
- Hazard Level C – high likelihood of either levee failure or the need to flood-fight to prevent levee failure.
- Lacking Sufficient Data (LD) – There is currently insufficient data about past performance or hazard indicators to assign a hazard level, or there is poor correlation between past performance and hazard indicator scores.

	DLIS Island /Tract or por on	SPFC	RD	Hazard Level	Standards	2010 popula on (whole island / tract)	Probability of Flooding (Hydrologic 2012 Baseline)	Priority
Freeport	Maintenance Area 9 North	Y	744			38*	1.4%	Very High
Clarksburg	Netherlands	Y	999	All B		917	1.2%	High
Clarksburg area	Lisbon	Y	307	C		163	1.0%	Other
Clarksburg area	Merritt Island	Y	150	A or B, B, C		173	1.2%	Other
Hood	Maintenance Area 9 South	Y	746	C		1,495	6.6%	Very High
Courtland	Pearson District	Y	551	B, LD		696	1.7%	Hlgh
Locke	Libby McNeil	Y	369	A		108	0.9%	Other

Walnut Grove – East Bank	Walnut Grove (Has its own RD)	Y	554	A		502	1.5%	High
Walnut Grove – West Bank	Grand Island	Y	3	B, C		1,388	2.2%	High
Ryde	Grand Island	Y	3			1,388	2.2%	Very High
Isleton	Brannan-Andrus Island	Y	407	B and C		1,586	1.9%	Very High
Rio Vista	DLIS-22				2.4 m of waterfront need upgrades	158 (within flood area)	0.1%	High
Bethel Island	Bethel Island				11.5 m at HMP	2,137	1.0%	Very High
Knightesen	DLIS-07 (Adjacent to Hotchkiss Tract)					216	0.0%	High
Knightesen	Veale Tract				4.2 m at HMP (100%)	55	1.0%	High

Other sources:

Report 1607, Delta Levees in Contra Costa County: How well do we protect this vital safety system, Contra Costa Grand Jury, 2015-16. Available at http://www.cc-courts.org/civil/docs/grandjury/1607_ReportSigned.pdf.

From the Yolo Bypass Draft EIS-EIR Chapter 4:

The Rio Vista waterfront is vulnerable to flooding along a 2.4-mile reach that extends along the waterfront from downtown near California Street to the Mellin Levee and northward along the Mellin Levee to high ground (Figure 5-18) (Solano County Water Agency, 2015). Rio Vista has proposed a combination of floodwalls, closure structures, and levee improvements to protect the city from 200-year flooding and higher sea level rise due to climate change. In the event that changes in the Yolo Bypass contribute to stage increases in the vicinity of Rio Vista, the State could potentially participate in the implementation of the local 200-year flood protection project as mitigation for such effects.

Deirdre Des Jardins

California Water Research

Climate change, adaptation & western water from nonlinear dynamics & complex systems perspective

Former researcher, Santa Fe Institute, Center for Nonlinear Studies at Los Alamos National Lab, NASA

Ames

"We aren't just failing to address the growing climate crisis to come; we're unprepared even for the impacts already here—in part because they keep surprising us with their intensity and in part because we can't seem to fathom our genuine vulnerability." – David Wallace Wells

831 566-6320

cah2oresearch.com

twitter: [@flowinguphill](https://twitter.com/flowinguphill)

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Thursday, February 22, 2024 1:45 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River Common Features public comment

From: Lissa Souther <lsouther@newbelgium.com>
Sent: Thursday, February 22, 2024 12:14 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River Common Features public comment

You don't often get email from lsouther@newbelgium.com. [Learn why this is important](#)

Hello

intro

1

I live on Middleton Way, in Sierra Oaks, with the levee in sight and the Parkway as my neighboring jewel. Finding out about the current plan for it to soon look denuded as it does near Sac State in the name of levee improvement has me greatly troubled. While I appreciate the need for flood control, it is hard for me to fathom that razing the land and decimating both flora and fauna is the only route available. And in saying this, I feel as if I one of many. Are there no engineers within the Army Corps who can figure out alternatives that find a balance between respect for the environment and keeping homes and infrastructures safe? If not, other opinions and ideas need to be sought out and considered. A targeted approach maybe? Again, there has to be a better way than the plan outlaid, which seems to me, simply crazy and without thought or concern for our wild and scenic river and the life beside it. And yes, I am saying that as a homeowner.

Adding my name to the masses,

Lissa Souther

LISSA SOUTHER

Sacramento/Tahoe/Chico Regional Ranger

916-879-0191

lsouther@newbelgium.com



From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Thursday, February 22, 2024 1:23 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River project between Howe and Watt

From: Mary Swisher <maryeswisher@gmail.com>
Sent: Thursday, February 22, 2024 1:15 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River project between Howe and Watt

You don't often get email from maryeswisher@gmail.com. [Learn why this is important](#)

Re: comment on American River flood project between Howe and Watt

The Army Corps of Engineers' plans for flood control along the American River Parkway between Howe and Watt Ave would be a devastation of animals and habitat.

intro In summer the trees and river banks provide an outdoor living area. We swim, kayak, bike and walk in the access to the cool river and lush trees. It is our back yard for many Sacramento families.

The concentration of wild life would be destroyed. Where can you go to see deer with their fawn or a coyote; all within a few minutes walk or bike ride. There are otter and beaver that can be approached in a canoe or Kayak. Fishermen sit peacefully in the early morning, waiting for a fish to bite. Children swing on ropes to drop into the cool water. I've watched a hawk sweep down to snatch a baby duck. This is where we take our children to see nature.

The destruction of the trees will make a once desirable place to live and play a wasteland for both humans and animals. The coyote and deer will be pushed into to neighborhoods causing panic and death.

1 The Army Corp of Engineers solutions for flood control should be tempered by concern for people and habitat. We bought a house seventy years ago in a flood plain knowing the risk. We chose to live here because of the trees and nature. It is time to have a more balanced approach than what the Corps is offering.

Mary Swisher
Elizabeth Swisher
Tom Freeman



From: [Avery, William E](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)
Date: Friday, February 16, 2024 5:47:00 AM

[Some people who received this message don't often get email from averyw@csus.edu. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for “bank erosion protection”. The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data”, and does not use advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction

of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the "Crown Jewel of Sacramento". Sacramento's "jewel" deserves the utmost care now and for future generations!

Thank you.

William E Avery, PhD
Professor Emeritus, Biological Sciences, CSUS
Concerned Local Resident

Sent from my iPad

From: [Zilan Chen](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)
Date: Friday, February 16, 2024 6:15:47 PM

[Some people who received this message don't often get email from zilan.chen8@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

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Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

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of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

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As you know, the American River is often called the "Crown Jewel of Sacramento". Sacramento's "jewel" deserves the utmost care now and for future generations!

Thank you.

Sent from my iPhone

From: [Pat H](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Friday, February 16, 2024 8:25:44 AM

Some people who received this message don't often get email from roseandbriar@outlook.com. [Learn why this is important](#)

Dear President Dolan and Members of the Board and Staff:

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Thank you.

From: [kruger4283](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Friday, February 16, 2024 3:29:24 PM

You don't often get email from kruger4283@yahoo.com. [Learn why this is important](#)

Dear President Dolan and Members of the Board and Staff:

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As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for “bank erosion protection”. The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data”, and does not use advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

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Thank you.adele kruger

From: [christopher beier](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Saturday, February 17, 2024 3:27:58 PM

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Thank you.

From: [Heather Frye](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)
Date: Saturday, February 17, 2024 3:41:10 PM

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Dear President Dolan and Members of the Board and Staff:

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I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

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Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

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Thank you.

Sent from my iPhone

From: [Brenda Gustin](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB); [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Saturday, February 17, 2024 7:44:04 PM

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I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

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Thank you.

Sincerely,
Brenda Gustin
Concerned Citizen and Native Sacramentan

From: [Andrew May](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Saturday, February 17, 2024 3:13:13 PM

You don't often get email from werdna_yam@yahoo.com. [Learn why this is important](#)

Dear President Dolan and Members of the Board and Staff,

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave. As a Fair Oaks resident and advocate for the parkway’s project of conservation and restoration, I am asking for your help.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

1. 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;
2. Work with USACE to extend the public comment period to ensure the above occur;
3. Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

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Thank you,
Andrew May

From: [Christie Vallance](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project - NATURE BASED INITIATIVE
Date: Saturday, February 17, 2024 3:28:40 PM

You don't often get email from christiev44@gmail.com. [Learn why this is important](#)

Dear Mr. Knapp,

Dear

As a homeowner in this region, 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.

This is possible as the US Army Corps of Engineers (USACE) has done many NATURE BASED flood control initiatives in the US, as outlined by President Biden. One nature based project is in

San Francisco and one in Sonoma County. The current proposal for our American River Parkway was done in 2016, before and the nature based initiatives. As someone in authority please support us!!!

Please see the photos attached that show the wash out when trees were clear cut in this first phase of this project, near Sacramento State.

Levees will more likely fail if they clear all the vegetation. Recent Caltrans commissioned studies on the American River show that mature trees redirect velocities from the banks to center channel. There is also a century of evidence, from the Great Mississippi Flood of 1927 to the massive Missouri Floods of 1993, which shows that levee failures happened overwhelmingly in areas where forests had been thinned or clear-cut. Please help!!!

The US Army Corps of Engineers 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**

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The American River Parkway is one of the greatest gifts of living in Sacramento, CITY OF TREES. THIS IS A VERY SPECIAL STRETCH OF THE AMERICAN RIVER PARKWAY!!! My husband and I moved to the Larchmont Park area of the American River 22 years ago just so we could be near the natural beauty of the

American River Bike Trail and hiking trails along the river. I use this area almost daily. My mental health has improved from walking here. The trees, birds and other wildlife, including the inhabitants along the river bring me such JOY. I love to birdwatch and I photograph this area often. It is such a pleasure to come home after a busy day and go out and unwind along these nature trails. This project is threatening my entire way of life. Please protect this area.

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As you know, the American River is often called the “Crown Jewel of Sacramento”. Please do not let our “jewel” be stolen from us!

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to YOU in your role as county supervisors, as well as members of the SAFCA Board. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and it would destroy a vital stretch of the Parkway.

I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you.

Christie Vallance

From: [Debbie Bakken](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Public Workshop request for USACE contracts 3B
Date: Monday, February 19, 2024 1:29:37 PM

Some people who received this message don't often get email from dbakken2010@gmail.com. [Learn why this is important](#)

Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for “bank erosion protection”. The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data”, and does not use advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river’s edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

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As you know, the American River is often called the “Crown Jewel of Sacramento”. Sacramento’s “jewel” deserves the utmost care now and for future generations!

Thank you.

Debbie Bakken

From: [Tom](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Monday, February 19, 2024 4:58:16 PM
Attachments: [image003.png](#)

You don't often get email from tom@tomcuster.com. [Learn why this is important](#)

Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for "bank erosion protection" on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4. The American River is extremely important to me and the quality of life in my community. I walk with my dogs along the affected portion of the river on average 3 x week. Often more. I value having this natural area in the midst of the city. This river is a designated a Wild and Scenic River that host beaver, otter, deer and other wild life seldom seen in an urban setting. This river suffered from the unrestricted mining early and through much of the 1900s and it has taken a couple generations to return to a more wild state. Now the proposed project threatens to destroy this wild state for a couple more generations. I have strong concerns that care is not being taken to preserve as many trees as possible and question the necessity

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to "Communicate, communicate and communicate as soon as possible". It is necessary this goal be accomplished now.

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to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

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A handwritten signature in black ink, reading "Tom Custer". The signature is written in a cursive style with a long horizontal stroke extending from the end of the name.

Tom Custer

From: [Clint Duke](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Central Valley Flood Protection Board
Date: Monday, February 19, 2024 10:03:28 AM

Some people who received this message don't often get email from clintduke87@gmail.com. [Learn why this is important](#)

Dear President Dolan and Members of the Board and Staff:

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Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

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This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

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Thank you.
Clint Duke

From: [Brenda Gustin](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Dolan, Jane@CVFPB](mailto:Dolan_Jane@CVFPB)
Subject: Procedure to have an item placed on the CVFPB Agenda or create a workshop
Date: Monday, February 19, 2024 8:30:58 AM

Some people who received this message don't often get email from bkgustin@gmail.com. [Learn why this is important](#)

Dear Jonah,

As a native of Sacramento, I am very concerned about the USACE project along the American River Common Features Project, specifically, the American River Erosion Contract 3B. I understand that the Central Valley Flood Protection Board will review the Draft SEIS-SEIR and have a vote in its approval or disapproval.

Is it possible to have this item placed on the CVFPB Agenda or will the CVFPB hold a workshop concerning this project before their final decision is made on the SEIS-SEIR?

1

Does the public have the right to request this? If so, what is the procedure to do so?

If not, will the CVFPB place it on their Agenda and host a workshop and if so, can you advise me as to when this will occur and the process and procedures they must follow.

We are very concerned about the procedure since the Public Comment period ends this next Friday, February 23, 2024, and we have yet to have our concerns and questions answered by the US Army Corp of Engineers nor have we received response from any agencies to whom we have written. It is very frustrating as a citizen to invest great amounts of time and energy to learn as much as possible about this project without feedback and a less than adequate plan which has been provided.

2

Please advise me of the procedures the Board must follow to review this draft.

I'm really not sure I'm even asking the right questions.

I look forward to hearing from you and learning more.

Sincerely,

Brenda Gustin

Concerned Citizen

From: [Karen Jacques](#)
To: [Knapp, Jonah@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Monday, February 19, 2024 9:22:51 PM

[Some people who received this message don't often get email from threegables1819@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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And, I respectfully request that your Board:

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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.

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Thank you.

Karen Jacques, Sacramento County Resident who loves the American River Parkway

From: [Steven Whitehead](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)
Date: Monday, February 19, 2024 10:35:18 AM

[You don't often get email from smksgnl8@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Thank you.
Steve Whitehead

Sent from my iPhone

From: [Barbara Domek](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Tuesday, February 20, 2024 12:38:09 PM

You don't often get email from barbjds@yahoo.com. [Learn why this is important](#)

Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for "bank erosion protection" on the lower American River Wild and Scenic Parkway east of Howe Ave and beyond Watt Ave. in Sacramento.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to "Communicate, communicate and communicate as soon as possible". It is necessary this goal be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for "bank erosion protection". The USACE claim that this protection is "needed" is based on minimal, overgeneralized "data", and does not use advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the severe "brute force" bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects) will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the

USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, jogging, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, horseback riding, outdoor painting, family strolls to de-stress and connect with nature, student ecology study, and many other uses) along the river's edge for miles, including the loss of dozens of unofficial, but much loved access trails to the water's edge, equestrian paths and rare shaded beaches. 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, turtles, butterflies, 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 mature trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment. My husband and I purposely purchased our home along this stretch of the river nearly 40 years ago specifically to raise our family within walking distance of this "protected" natural riparian wooded area along the river. If this project goes through as planned, I won't be alive to see the return of the precious natural environment we love so dearly. It'll be gone forever.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the "Crown Jewel of Sacramento". Sacramento's "jewel" deserves the utmost care now and for future generations!

Thank you.

Barbara Domek

From: [Jaime Becker](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)
Date: Tuesday, February 20, 2024 9:21:00 PM

[You don't often get email from jaime@jaimesells.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

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Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

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Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

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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.

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Thank you.

Sincerely,

Jaime Becker

From: [rcorell1](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Tuesday, February 20, 2024 11:35:41 AM

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I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

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Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river’s edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls,

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Thank you.

From: [SHARON CORELL](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB); [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Tuesday, February 20, 2024 6:23:50 PM

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Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

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The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river’s edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational

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Thank you.

Sent from my iPad

From: [Chad Wilson](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)
Date: Tuesday, February 20, 2024 9:00:19 PM

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Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

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Thank you.

From: [CHRISTOPHER WRIGHT](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)
Date: Tuesday, February 20, 2024 7:56:18 PM

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Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction

of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the "Crown Jewel of Sacramento". Sacramento's "jewel" deserves the utmost care now and for future generations!

Thank you. Craig Wright

Sent from my iPhone

From: [Kristen Baker](#)
To: arcf_seis@usace.army.mil; [DWR Public Comment ARCF 16](#)
Cc: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB); [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB); amrivtrees@gmail.com
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Wednesday, February 21, 2024 9:10:01 AM

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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:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and

communicate as soon as possible”. It is necessary for this goal to be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for “bank erosion protection”. The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data”, and does not use advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking,

fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the "Crown Jewel of Sacramento". Sacramento's "jewel" deserves the utmost care now and for future generations!

Thank you.

From: [Lief, Chris@CVFPB](mailto:Lief,Chris@CVFPB)
To: [Calles, Jennifer@CVFPB](mailto:Calles,Jennifer@CVFPB); [Knapp, Jonah@CVFPB](mailto:Knapp,Jonah@CVFPB)
Subject: Fwd: Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.
Date: Thursday, February 22, 2024 7:41:09 AM

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From: Nic Domek <nicdomek@gmail.com>
Sent: Wednesday, February 21, 2024 10:13:12 PM
To: Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>
Subject: Comments on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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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. 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! I personally grew up a few blocks from the American River Parkway near Watt Avenue and La Riviera Drive, and exploring the river with our dog were a highlight of my childhood. I spent many hours running along the scenic trails, biking, filming home videos, or even going to see stinky dead fish during fish breeding season. From a young age, the Parkway instilled in me a sense of wonder and appreciation for nature that I carry with me every day. I want future generations to continue to have the opportunity to have similar experiences to me, which is why I am passionate that the erosion efforts be performed with great care and thought to the vegetation and animal life there.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to YOU in your role as county supervisors, as well as members of the SAFCA Board. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you.

-Nicholas Domek

From: [Nathan Domek](#)
To: ARCF_SEIS@usace.army.mil; [DWR Public Comment ARCF 16](#); [Knapp, Jonah@CVFPB](mailto:Knapp.Jonah@CVFPB); [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Comments on American River Levee Project (Army Corps of Engineers ARCF SEIS Contract 3B)
Date: Wednesday, February 21, 2024 8:24:06 PM

Some people who received this message don't often get email from nathandomek@gmail.com. [Learn why this is important](#)

To whom it may concern,

I am emailing regarding the proposed US Army Corps of Engineers (USACE) levee erosion control project, specifically regarding American River Erosion Contract 3B North and South.

I'm sure you've heard from many others so I will be brief: The environmental impact report for Contract 3B states "to the greatest extent possible, existing trees will be protected in place" (p 3-43) but if you look at what the Army Corps of Engineers did to the previous section of levee several year ago near CSUS/River Park neighborhood/Paradise Beach, (USACE levee Contracts 1 and 2), you will see that this was more akin to clearcutting -- it is obvious that only minimal thought went into preservation at all. So please forgive me and others for being extremely skeptical of this wording in the EIR. Planting a few trees here and there afterwards does not make up for the removal of hundreds of mature trees.

The proposed plan will devastate much of the natural habitat of the American River Parkway, one of Sacramento's most valued resources. There are better, more targeted methods of erosion control that don't involve total devastation of the local plant (and animal) life. Yes, it may be harder or take longer, but it would be the right thing to do. By continuing with the current plan the Army Corps will be stripping away a beloved recreation area for generations to come.

I grew up in the neighborhood just adjacent to the 3B south contract construction area. My parents still live there. Every day and especially on weekends there are dozens if not hundreds of families and recreationists out enjoying this beautiful natural environment which is a rare thing to have in a city, and something that we need to cherish and preserve. This section of the Parkway is one of the best features of that neighborhood. Its destruction will not only anger the residents here; it will likely decrease the value of homeowners' properties in the area. Would you want to live near a beautiful lush park, or a barren dirt patch?

Of course I recognize the importance of flood control measures and the fact that the levees need improvements. But the methods currently proposed for this area are far too destructive. A selective, more targeted approach is the right thing to do. Please do not go forward with the current plan as proposed.

In conclusion, while obviously there's not much time left now (considering the public comment period closes in 2 days), for anyone who may think I'm over-exaggerating, please take a walk along the levee trail where the USACE had their way several years ago in the CSUS/River Park/Paradise Beach area. The area to this day is mostly barren and nowhere near the thriving riparian habitat it was before.

Thank you,

Nathaniel Domek

From: [Greg Gearheart](#)
To: ARCF_SEIS@usace.army.mil; [DWR Public Comment ARCF 16](#)
Cc: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB); BellasE@saccounty.net; [Sean Bothwell](#)
Subject: Lower American River - Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices
Date: Wednesday, February 21, 2024 3:45:53 PM

You don't often get email from olawai@gmail.com. [Learn why this is important](#)

Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

A *I live nearby and paddle this reach affected at least 30 times a year. I take groups to paddle here from out of town and center equity in the events to make this place a showcase of #swimmableCA, per the [resolution](#) adopted by California Legislature making July 25 "Swimmable California Day" every year. This project threatens the work many have done to make this section of the Lower American River the most iconic, swimmable river in the Country.*

B I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River. If the project proceeds as planned the project will cause significant impacts economically, ecologically and disparately to adjacent communities, making this project environmentally unjust and racially inequitable. In addition, the project will affect communities outside the local area, as many events and tourists use this area to recreate (and will go elsewhere for many years).

C Migratory wildlife will be significantly affected, too, from the removal of habitat and shaded riparian areas. Finally, this will increase human contribution to climate change due to reduced bike commuters and an increase of urban heat

island effect during and beyond the construction window.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much more targeted and less impacting approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” everywhere there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and

some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has

been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,”

all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive

alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Questions:

D (1) have you done a community centered economic and health analysis of the proposed solution using racial demographically disaggregated community data? What was your method and does it consider cumulative impacts like air pollution, heat island effect, mental health and other drivers?

E (2) does the project as proposed align with studies the Corps of Engineers has produced over the last two decades showing trees can be both helpful to levee strength as well as potential risks for levee failure? Based on what we saw in River Park it seems like the current thought is that virtually any and all trees on levees and within floodplains are considered a risk that needs to be mitigated.

F (3) do you have up to date user data for this reach and surrounding parkway, including data on swimmers and boaters? Would it be possible to synthesize demographic or economic data to help the communities impacted have a better sense of the value of their losses?

Thank you.

Greg Gearheart

From: [Rich Howard](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: USACE proposed Contracts 3B and 4
Date: Wednesday, February 21, 2024 8:18:45 PM

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Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been

posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the “Crown Jewel of Sacramento”. Sacramento’s “jewel” deserves the utmost care now and for future generations!

Thank you.

Richard F. Howard
Carmichael, CA

From: [Scott Ricci](#)
To: [Knapp, Jonah@CVFPB](#); [Lief, Chris@CVFPB](#)
Subject: Fw: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices
Date: Wednesday, February 21, 2024 8:19:03 AM

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----- Forwarded Message -----

From: Scott Ricci <pan4ever@sbcglobal.net>
To: ARCF_SEIS@usace.army.mil <arcf_seis@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov <publiccommentarcf16@water.ca.gov>
Sent: Tuesday, February 20, 2024 at 12:22:23 PM PST
Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

A | The American River Parkway is extremely valuable to us. We've hiked the portion of the river many times with friends that live in the adjacent neighborhood and will be impacted by the proposed changes.

My specific concerns include the following:

B

- 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.

C

- 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?
- 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.
- 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?

D

- 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.
- 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.

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.

Scott and Carol Ricci
Santa Rosa, CA

From: [Joan Rubenson](#)
To: ARCF_SEIS@usace.army.mil
Cc: [DWR Public Comment ARCF 16](#); [Knapp, Jonah@CVFPB](#); bellase@saccounty.net; Susan_Rosebrough@nps.gov; RichDesmond@saccounty.gov
Subject: Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices
Date: Wednesday, February 21, 2024 7:30:46 PM

You don't often get email from joanndavid2@gmail.com. [Learn why this is important](#)

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 my whole community, including my husband and myself.

A My husband and I purchased our house in the Larchmont Riviera neighborhood many years ago because we fell in love with the beauty of the American River in this area. We are aware that before us there were many others, including the Miwok and other tribes of people who were stewards of the river and land beside it. On our walks we see deer, skunks, coyotes, fish, beavers, and many other creatures living in harmony with the people. Ours is mostly a happy community nestled beside the beautiful river. Of course we have concerns about flooding in our area and do very definitely appreciate the US Army Corps of Engineers (in fact, I worked for the USACE many years ago as a budget analyst on J Street and 13th downtown) shoring up our rivers to keep us all safe. We and many others in our community rely on the river to give us physical and mental relief from our busy, complicated modern society and question the massive damage that has been done in other areas of the river to prevent future flooding and what is evidently planned for our area. We also question if the bulldozing of up to 500 trees in our area is the best idea for keeping the levees from breaking up during high, fast waters. Through the good, caring people at AmericanRiverTrees.org I learned about Engineering With Nature An Atlas by Todd S. Bridges, PhD Senior Environmental Science National Lead for Engineering with Nature (I believe Dr. Bridges was or is an employee of the US Army Corps of Engineers). I really hope that those who are the planners of these projects will slow down a bit to read through Dr. Bridges' writing

B

and study the work that has already been done in different areas to minimize risk from floods in a more natural way.

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 and that natural armoring would be lost and make us less safe. Destruction of natural vegetation worsens the effects of a warming planet.
2. The river's Wild and Scenic designation is compromised by a rigid, artificial shoreline.
3. Erosion is minimal in USACE's Contract 3B.
4. 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.
5. 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? 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.

6. Perhaps most important, 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.

7. Air quality is enhanced and mitigated with our beautiful river's trees and plants. That's huge!

8. Environmental justice: The proposed methods would eliminate locations that are accessible to disadvantaged populations. The environmental justice issue has not been adequately addressed in the environmental analysis.

D Our requests: We need more information. The public cannot possibly understand, let alone intelligently comment, on the work to be done and how it affects resources they care about. Please! Do not proceed with your current plan until a much more targeted and less destructive alternative approach to Erosion Control Projects 3B and 4 is presented.

Sincerely,

Joan Rubenson

Homeowner and Nature Lover

Larchmont Riviera Community

From: [Will Schaafsma](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Wednesday, February 21, 2024 6:59:21 PM

[Some people who received this message don't often get email from willschaafsma@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for “bank erosion protection”. The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data”, and does not use advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction

of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the "Crown Jewel of Sacramento". Sacramento's "jewel" deserves the utmost care now and for future generations!

Thank you.
Will Schaafsma
Sent from my iPhone

From: [Patty selsky](mailto:phselsky@surewest.net)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Central Valley Flood Protection Board
Date: Wednesday, February 21, 2024 4:11:37 PM

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Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

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Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

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Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction

of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

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Thank you.

Patricia Selsky

Sent from my iPhone

From: [Cynthia Albrecht](#)
To: ARCF_SEIS@usace.army.mil; [DWR Public Comment ARCF 16](#)
Cc: Knapp_Jonah@CVFPB; BellasE@saccounty.net; SorgenKC@saccounty.gov; Susan_Rosebrough@nps.gov; Barbara_Rice@nps.gov; hbwillia44@gmail.com; RichDesmond@saccounty.gov; PatHume@saccounty.gov; SupervisorKennedy@saccounty.gov; SupervisorSerna@saccounty.gov; SupervisorFrost@saccounty.gov; Matthew.Ceccato@mail.house.gov; repamibera@mail.house.gov
Subject: Increased need for water rescue resources? Other properties for staging consideration? Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – ...
Date: Thursday, February 22, 2024 7:51:47 AM

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Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I also add two additional questions, one, whether or not the need for more water rescue personnel and equipment has been studied with the removal of these number of trees and the increased access to a bare shoreline along the river in this area. Two, this area already has a reduced number of parks per capita and you are purposing to remove access to one of the largest ones in the area for over two years. There are nearby vacant or under utilized lots (like across from the Butterfield light rail station) that could be annexed and used without reducing community use of the largest park in the region.

The American River Parkway and its woods and wildlife are extremely valuable to me.

I moved to the Sacramento region from Colorado just over twenty years ago and choose to live near the American River Parkway (within two blocks of one of the access points) because I wanted to be able to spend consistent time walking, running, cycling, and exploring this beautiful parkway. In a lot of ways the American River Parkway was my children's first playground. One of our first memories of meeting neighbors involved geocaching along the shoreline. My kids often asked to go down to see the ducks and geese near the water. We also spotted beavers, river otters, occasional sea lion, scores of different birds, occasional coyote, rabbits, snakes, squirrels, and more. I wonder how the removal of all these trees will change or endanger the habitats for many of these animals.

As a parent who loves the great outdoors, natural habitats, and understands the dangers or risks of open waters, I sought to encourage my kids exploration and taught them the water could be enjoyed with the proper safety measures. Right now, there are limited places to access the shoreline due to the trees and foliage along the shoreline. I can't but help wonder what will happen with a naked shoreline with dogs that get away from their owners, young children that wander

down there, or even just families who don't adequately understand the risks of open water swimming in the river. Some of the areas that will now be more accessible have very deep pockets of water not far from the shoreline. Has a study been done regarding an increased need for water rescue personnel and equipment in this area too?

Besides, the questions I raised in the previous paragraphs, I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on

pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its

outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and

impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In

particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Cynthia Albrecht

From: [Jill Noordzij](#)
To: [Knapp, Jonah@CVFPB](mailto:Knapp_Jonah@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief_Chris@CVFPB)
Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date: Thursday, February 22, 2024 9:44:16 AM

[Some people who received this message don't often get email from jillinsac@hotmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear President Dolan and Members of the Board and Staff:

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;

Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and questions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for “bank erosion protection”. The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data”, and does not use advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction

of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the "Crown Jewel of Sacramento". Sacramento's "jewel" deserves the utmost care now and for future generations!

Thank you.

Jill Noordzij

Sent from my iPhone

Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Ann Trowbridge <atrowbridge@daycartermurphy.com>

Thu 2/22/2024 10:51 AM

To: ARCF_SEIS@usace.army.mil <ARCF_SEIS@usace.army.mil>

Cc: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>; Knapp, Jonah@CVFPB

<Jonah.Knapp@cvflood.ca.gov>; BellasE@saccounty.net <BellasE@saccounty.net>; SorgenKC@saccounty.gov

<SorgenKC@saccounty.gov>; Susan_Rosebrough@nps.gov <Susan_Rosebrough@nps.gov>; Barbara_Rice@nps.gov

<Barbara_Rice@nps.gov>; hbwillia44@gmail.com <hbwillia44@gmail.com>; RichDesmond@saccounty.gov

<RichDesmond@saccounty.gov>; PatHume@saccounty.gov <PatHume@saccounty.gov>; SupervisorKennedy@saccounty.gov

<SupervisorKennedy@saccounty.gov>; SupervisorSerna@saccounty.gov <SupervisorSerna@saccounty.gov>;

SupervisorFrost@saccounty.gov <SupervisorFrost@saccounty.gov>; Matthew.Ceccato@mail.house.gov

<Matthew.Ceccato@mail.house.gov>; repamibera@mail.house.gov <repamibera@mail.house.gov>

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Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

A I lived on American River Drive and attended Rio Americano High School; I currently live near Ashton Park. In high school, we often visited the Parkway for classwork in biology. There could not have been a more valuable way to learn and to instill an appreciation for all of the plants and animals that call the Parkway home. My husband and I specifically bought our current home so that we could access the Parkway without having to cross Fair Oaks. Our family uses it all the time, for exercise (we've put hundreds of biking, running and walking miles in!), recreation (picnics, canoeing, rafting) and to enjoy and appreciate the vast, beautiful and vitally important Parkway natural resources (herons, egrets, badgers, deer, doves, rabbits, coyotes, ducks, geese, turkeys, vultures, the occasional sea lion, heritage oaks, berry bushes, grasses, and on and wonderfully on). A daily walk along the river was a critically important respite for my husband while he went through a brutal course of chemotherapy and radiation. The Parkway is part of our home, and we are heartbroken to think that a bazooka might be taken to it when a toy Nerf gun would suffice.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are "necessary" for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its

subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and

Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

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Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of

what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

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This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Ann Trowbridge

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 1:28 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Oak trees along American River Parkway

From: Doug Cauch <dnc1319@gmail.com>
Sent: Thursday, February 22, 2024 1:23 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Oak trees along American River Parkway

As a certified arborist for many years here is my comment.

- 1 Please be selective when you prepare to improve levee efficiency.
Clear cutting vegetation or near clear cutting is the easy way for the project to proceed. You don't have to do it that way, and you know it.
Your actions will have a devastating effect on the environment along the river.

Long time resident and ardent friend of the river and surrounding areas.
Douglas Cauch

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 4:27 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Fwd: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, Ca
Attachments: Joshua Thomas Comment 2023 ARCF Draft SEIS SEIR.pdf

From: Josh Thomas <joshjhthomas@gmail.com>
Sent: Thursday, February 22, 2024 4:11 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Fwd: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, Ca

Dear United States Army Corps of Engineers comment recipients,

I messed up the address in my original email, so I'm forwarding you this email with my comment letter for the December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, Ca.

Sincerely,
Joshua Thomas

----- Forwarded message -----

From: Josh Thomas <joshjhthomas@gmail.com>
Date: Thu, Feb 22, 2024, 1:10 PM
Subject: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, Ca
To: <ARC_SEIS@usace.army.mil>, <PublicCommentARCF16@water.ca.gov>
Cc: <bellase@saccounty.gov>, <sorgenkc@saccounty.gov>, <susan_rosebrough@nps.org>, <barbara_rice@nps.gov>

Dear United States Army Corps of Engineers and CA Dept. of Water Resources public comment recipients,

I've attached a letter which reviews the environmental analysis and alternatives provided within the December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project. I look forward to your response and hope that you will in good faith consider the critiques and suggestions in my letter.

Sincerely,
Joshua Thomas (He/Him)
Ph.D Candidate, History Department
University of California Davis

February 22, 2024

Mr. Guy Romine
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814
Guy.K.Romine@usace.army.mil

Mr. Josh Brown
Central Valley Flood Protection Board/California Dept of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, California 95821
Josh.Brown@water.ca.gov

Submitted via email: ARC_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

Dear Mr. Romine and Mr. Brown,

intro

In this letter I critique the incomplete and insufficient environmental analysis provided by the December 2023 ARCF Draft SEIS/SEIR and the documents it supplements, the 2016 *General Reevaluation Report* (GRR) and the 2016 Final EIS/EIR.¹ In these documents, the United States Army Corps of Engineers (USACE) uses biased data and outdated modeling to justify one-size-fits-all riprap erosion measures to the exclusion of less environmentally destructive bioengineering alternatives, ignores and minimizes important environmental impacts, offers inadequate mitigation, and disregards public apprehension about the ecological implications of USACE's proposals. With an understanding that the most durable and effective flood control systems work with nature rather than against it, I respectfully ask that USACE and the Central Valley Flood Protection Board consider less destructive bioengineering erosion prevention measures that are better justified by more up-to-date modeling and by more complete data. The risk to the safety of the Sacramento Region, to precious resources of the American River Parkway, to our Wild and Scenic River, and to endangered species are too great for USACE to follow through with their current proposed measures for American River Erosion Contract 3B in the December 2023 Draft ARCF SEIS/SEIR.

¹ I understand that detailed technical analysis is meant for the appendices rather than the main EIS/EIR report. For the sake of brevity and flow, I only refer to the GRR, Final EIS/EIR, and 2023 Draft SEIS/SEIR, but statements about inadequacy, insufficiency, or incompleteness in the GRR, Final EIS/EIR, and the 2023 ARCF Draft SEIS/SEIR include their appendices. If, for example, I state that "heritage oaks were only mentioned 9 times in the 2023 ARCF Draft SEIS/SEIR," I am referring to the total number of mentions of heritage oaks in the SEIS/SEIR and its appendices.

1 Before I delve into the analysis, I want to thank USACE and CVFPB for the critical work they have done keeping the Sacramento Region safe. As a PhD candidate who just finished a dissertation on the history of flood control in the Sacramento Valley, I understand that without extensive and well-maintained flood control infrastructure, the Sacramento Valley could not be home to over a million people.

From my research I also know that before flood control engineers get things right, they often get them disastrously wrong. It is an unfortunate rhyme of history that humans increasingly believe they can dominate nature until nature loses patience with their hubris. Such was the case before 1927, when USACE rejected as “chimerical” and “dangerous” the belief that humans could never control rivers but only accommodate them with multitiered systems that incorporated spillways and outlets.² USACE insisted that engineering science allowed for the use of only levees to prevent floods, despite evidence that building levees ever higher just increased flood heights.³ Then stormwaters blasted through Mississippi River levees in 1927, killing hundreds and displacing a quarter of a million people.⁴ Gifford Pinchot later deemed the levees-only policy a “complete engineering blunder and failure.”⁵ After the Great Flood of 1927, USACE pledged to work in harmony with the Mississippi in the future and started incorporating spillways and outlets in their designs.⁶

Fortunately, the Sacramento Region broke from the levees-only orthodoxy early with the Sacramento River Flood Control Project, initiated at the state level in 1911.⁷ From observing that the Sacramento Region consists of basins which naturally take in waters from overflowing rivers during storms, the designers of the Sacramento River Flood Control Project devised a system which mimics the regions natural tendency for overflow by using bypasses and weirs to allow for controlled flooding.⁸ This nature-based system has worked for over a century; however, California came close to implementing a blundering levees-only system with the Dabney Plan, which a commission of USACE engineers devised.⁹ In 1905 California tasked the newly created Sacramento Drainage District with implementing the Dabney Plan.¹⁰ But landowners derided by Dabney Plan proponents as scientific illiterates delayed the Plan’s

² Ari Kelman, *A River and Its City: The Nature of Landscape in New Orleans* (Berkeley: University of California Press, 2006), 163.

³ *Ibid.*, 164-169.

⁴ *Ibid.*, 187.

⁵ *Ibid.*, 190.

⁶ *Ibid.*, 192-195.

⁷ “An Act Approving the Report of the California Debris Commission,” *The Statutes of California and Amendments to the Constitution Passed at the Extra Session of the Thirty-Ninth Legislature, 1911*, Chapter 25, (Approved December 24, 1911).

⁸ *Reports on the Control of Floods in the River Systems of the Sacramento Valley and the Adjacent San Joaquin Valley, Cal. June 29, 1911, Referred to the Committee on Rivers and Harbors* (Washington, 1911), 7-15.

⁹ *Report of the Commissioner of Public Works to the Governor of California, Together with the Report of the Commission of Engineers to the Commission of Public Works Upon the Rectification of the Sacramento and San Joaquin Rivers and their Principal Tributaries, and the Reclamation of the Overflowed Lands Adjacent Thereto* (Sacramento: Superintendent State Printing, 1905).

¹⁰ “An Act to Create a Drainage District to be Called ‘Sacramento Drainage District,’” *The Statutes of California and Amendments to the Codes Passed at the Thirty-Sixth Session of the California Legislature, 1905*, Chapter CCCLXVIII, (Approved March 20, 1905), 456.

implementation until the 600,000 cfs events of 1907 and 1909, which were twice as much as the 300,000 cfs estimates from bypass proponents that Major T.G. Dabney dismissed as impossibly high, demonstrated the infeasibility of a levees-only approach on the Sacramento River.¹¹ Had the state of California carried out the Dabney Plan, it would have expended millions on levees which the storms of 1907 and 1909 would have obliterated or overtopped.¹²

2 I mention this history because once again USACE engineers seem intent on brute-forcing flood control, this time by armoring the banks of the Lower American River with riprap. FEMA frequently repairs riprap facilities and has remarked that “the very nature of having to repair these facilities counters the popular engineering belief that riprap is the best solution for mitigating stream bank erosion.”¹³ Neither the *General Reevaluation Report* nor the December 2023 Draft ARCF SEIS/SEIR seriously considered less destructive, nature-based alternatives to riprap. The “no-action alternative” in the Draft SEIS/SEIR is simply the proposal of the 2016 GRR, which includes “bank protection” (i.e. riprap armoring) and launchable rock trenches.¹⁴ Moreover, despite the outdated 2016 analysis, and new information demonstrating the feasibility of less destructive alternatives for this beloved stretch of Wild and Scenic River, USACE excludes any nature-based alternative to riprap. Instead, USACE only presents minor alternatives for individual projects, while “all other projects remain the same.”¹⁵

¹¹ On the 1895 bypass plan designed for 300,000 cfs: “Report of the Commissioner of Public Works,” *Appendix to the Journals of the Senate and Assembly of the Thirty-First Session of the Legislature of the State of California, Volume IV* (Sacramento, 1895). Dabney’s critique of the 1895 plan: T.G. Dabney, *Report of the Commissioner of Public Works*, 33-35. On the 1907 and 1909 floods: Robert Kelley, *Battling the Inland Sea: Floods, Public Policy, and the Sacramento Valley* (Berkeley: University of California Press, 1989), 277-278.

¹² Robert Kelley, *Battling the Inland Sea*, 277-278.

¹³ FEMA, *Engineering with Nature: Alternative Techniques to Riprap Bank Stabilization*, 7.

¹⁴ *American River Common Features General Reevaluation Report*, 3-48.

¹⁵ December 2023 ARCF Draft SEIS/SEIR, 3-7 and 3-8.

3.3.3 Alternatives Considered in Detail in the SEIS/SEIR

The following alternatives are evaluated at an equal level of detail in this SEIS/SEIR:

- **Alternative 1:** No Action Alternative (NEPA baseline project as presently constructed / to be completed through performance of contracts underway or presently authorized)
- **Alternative 2:** Proposed Action (American River Erosion Contract 3B, American River Erosion Contract 4A, American River Erosion Contract 4B, Sacramento River Erosion Contract 3, MCP, ARMS, SRMS, and the Piezometer Network)
- **Alternative 3** (Alternative Designs for American River Erosion Contract 4A all other contracts would remain the same as Alternative 2)
 - **Alternative 3a:** Landside Berm to Avoid Bike Trail Reroute
 - **Alternative 3b:** Permanent Bike Trail Reroute

ARCF Comprehensive SEIS/SEIR

3-7

Description of Project Alternatives

- **Alternative 3c:** Bike Trail Reroute and Bridge
- **Alternative 3d:** Bike Trail Reroute Along Railroad
- **Alternative 4:** (Alternatives Designs of ARMS – CEQA-Only all other contracts would remain the same as Alternative 2)
 - **Alternative 4a:** ARMS Pond Retention (CEQA-Only)
 - **Alternative 4b:** ARMS Pond Retention (CEQA-Only)
- **Alternative 5:** (Alternatives to SRMS all other contracts would remain the same as Alternative 2)
 - **Alternative 5a:** Purchase Mitigation Credits
 - **Alternative 5b:** Watermark Farms Mitigation Site
 - **Alternative 5c:** Delta Smelt Bank and Sunset Pumps Mitigation Credits
- **Alternative 6:** No Project Alternative (CEQA). This alternative assumes that none of the improvements identified in the Action Alternatives would be constructed.

Figure 1

For Contract 3B, which covers both banks between Howe Avenue and Larchmont Community Park, the 2023 proposal is just the 2016 preferred alternative with the addition of launchable rock toes and tiebacks.¹⁶ Launchable rock toes are functionally the same as launchable rock trenches except they are placed at rivers edge instead of higher up the bank.¹⁷ Tiebacks are riprap laid perpendicular instead of parallel to the river.¹⁸ USACE explores no

¹⁶ December 2023 ARCF Draft SEIS/SEIR, 3-11, 3-25, and 3-26.

¹⁷ Ibid, 3-29.

¹⁸ Ibid.

biotechnical or bioengineering alternatives, even though the lower American River is a protected area. USACE is only offering the public a choice between riprap and more riprap. This choice, according to a USACE presentation to the Lower American River Task Force in December of 2023, could remove 685 trees.¹⁹ For American River Erosion Contract 3B South, where USACE plans to remove 522 trees, the 2023 SEIS/SEIR simply states that “one alternative was considered but rejected due to having additional environmental impacts.” USACE did not even briefly indicate what that alternative entailed.²⁰

USACE’s choice to give the public no alternative besides riprap makes a mockery of the review process. The Council on Environmental Quality (CEQ) calls the alternatives section “the heart of the EIS.”²¹ This section, according to CEQ, is supposed to rigorously explore and objectively evaluate all reasonable alternatives.²² The California Environmental Quality Act (CEQA) requires that an EIR provide a range of alternatives to a project that “will feasibly attain most of the basic objectives of the project.”²³ Note that CEQA only mandates that alternatives feasibly attain “most,” not all, of a project’s basic objectives. This indicates that CEQA intends that lead agencies offer a range of choices. Whereas a single proposal precludes public engagement, a range of choices can “foster informed decision making and public participation.”²⁴ The intention to foster public participation and informed decision making through discussion of a meaningful range of alternatives was articulated by the Third District of Appeal, whose jurisdiction includes Sacramento County. In *We Advocate Through Environmental Review v. County of Siskiyou*, the Court ruled that making project objectives so narrow “as to preclude any alternative other than the Project” violated CEQA.²⁵ In particular, the Court criticized Siskiyou County for ensuring that “the results of its alternatives analysis would be a foregone conclusion.”²⁶ In making the alternatives a foregone conclusion, the County “transformed the EIR’s alternatives section—often described as part of the ‘core of the EIR’—into an empty formality.”²⁷ Here too, by limiting the public’s choice to nothing but riprap and more riprap for Contract 3B, USACE has turned the public review process for the December 2023 ARCF Draft SEIS/SEIR into an empty formality.

The alternatives of riprap or more riprap not only mocks the review process, but it runs afoul of both the National and State Wild and Scenic River Acts. The Lower American River from the confluence to the Nimbus Dam is designated as a protected river under both the California and the National Wild and Scenic River Acts.²⁸ These Acts require preserving

¹⁹ Lower American River Task Force, December 12, 2023. <https://waterforum.org/wp-content/uploads/LARTF-Dec-2023-Slides.pdf>

²⁰ December 2023 ARCF Draft SEIS/SEIR, 3-5.

²¹ Council on Environmental Quality, *Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations*, (March 23, 1981, Amended 1986).

²² *Ibid.*

²³ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15126.6(a).

²⁴ *Ibid.*

²⁵ *We Advocate Through Environmental Review v. County of Siskiyou* (April 20, 2022) 78. Cal.App.5th 683.

²⁶ *Ibid.*

²⁷ *Ibid.*

²⁸ Federal Register, Vol. 46, No. 15, January 23, 1981.

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cont'd

protected rivers “in free flowing condition.”²⁹ The National Wild and Scenic River Act (NWSRA) defines free flowing as “existing or flowing in natural condition without impoundment, diversion, straightening, **rip-rapping**, or other modification of the waterway.”³⁰ The NWSRA allows for the existence of riprap on the waterway at the time of a river’s inclusion, but clarifies that “this shall not be construed to authorize, intend, or encourage future construction of such structures within components of the national wild and scenic rivers system.”³¹ The California Wild and Scenic River Act (CWSRA) only permits new riprap on the Eel River, stipulating that “nothing in this chapter shall be construed to prohibit any measures for flood protection, structural or nonstructural, necessary for the protection of lives and property along the Eel River.”³² The explicit exclusion of the Eel River from the riprapping prohibition indicates that the CWSRA was meant to prohibit riprapping on all the other rivers included in the CWSRA system. This interpretation is reinforced by the legislature’s declaration that the use of these rivers in “their free-flowing state, together with their immediate environment,” is of the “highest and most beneficial use.”³³

USACE claims that river velocities ruled out less destructive alternatives, but that assertion is not justified by the technical documents they cite. As USACE explained in letters to apprehensive citizens in the 2016 Final EIS/EIR Public Involvement Appendix:

6

“The proposed bank protection and launchable rock trench measures are the only two possible measures that could address the significant erosion problem on the American River. **Other measures were eliminated from consideration because the river velocities render them infeasible.** More information on the erosion problem on the American River can be found in the Erosion Protection Appendix to the GRR (GRR Appendix C, Attachment E).”³⁴

The document USACE advised apprehensive citizens to read, the *Erosion Protection Report*, indicates that USACE could avoid a lot of devastation in the Contract 3B area. The experts consulted in the *Erosion Protection Report* understood that to properly prioritize work, USACE should develop “systematic and justifiable criteria for site stabilization.”³⁵ For that to be achieved, USACE would need to analyze lots of soil samples, called borings, due to a “high degree of variability in the bed materials.”³⁶ The experts believed that USACE could not “assure continuity of various layers” without analyzing more borings than they had already, and the experts warned USACE that “interpretations made of connecting the dots between borings could be erroneous.”³⁷ Analyzing more borings could further avoid needless devastation by accounting for “the horizontal and vertical location of the scour resistant clay” for project

²⁹ Wild and Scenic Rivers Act, Sec. 1(b). California Wild and Scenic Rivers Act, 5093.50.

³⁰ Wild and Scenic Rivers Act, Sec. 15(b).

³¹ Ibid.

³² California Wild and Scenic Rivers Act, 5093.57.

³³ Ibid, 5093.50.

³⁴ ARCF Final EIS-EIR - Jan. 2016 (Updated May 2016), Appendix F-Public Involvement.

³⁵ *American River Common Features General Reevaluation Report*, Attachment E, Erosion Protection Report, 15.

³⁶ Ibid, 17.

³⁷ Ibid.

designs.”³⁸ **Instead of following their expert panel recommendations to analyze borings from possible erosion resistant places along the Lower American River, USACE instead resorts to overgeneralized data to justify a one-size-fits-all approach to erosion protection.** USACE did hire consultants to map out the stratigraphic layers of the Lower American River.³⁹ Fugro Associates collected dozens of borehole samples, including 5 on the south bank between the Mayhew Drain and the Watt Bridge.⁴⁰ While this is too few borings, it is 5 more than USACE used in the *Geotechnical Report* for the area of Contract 3B South. USACE briefly summarized the Fugro Report, noting that the “study demonstrated the presence of two potentially erosion-resistant units,” including widespread “relatively erosion-resistant deposits associated with the Pleistocene-aged Fair Oaks Formation.”⁴¹ Nevertheless, USACE’s geotechnical analysis eschewed Fugro’s geologic mapping for the Contract 3B South area. Instead, its analysis only considered two index points along the entire Lower American River, none upstream of Howe Bridge.⁴²

Table 8-1: Index Point Locations

Basin	Reach	Channel	Bank	Unit	Levee Mile
ARN	A	American River	North	9	1.32
ARN	E	Arcade Creek	North	7	0.90
ARS	B	American River	South	4	3.90
ARS	F	Sacramento River	East	1	5.92
NAT	D	NCC	South	2	1.17

Figure 2: Index point locations in Geotechnical Report used to determine probability of levee failure under different high-water flows.

³⁸ Ibid, 15.

³⁹ *American River Common Features General Reevaluation Report*, Attachment C - Geotechnical Report, 25.

⁴⁰ Fugro Consultants, *Lower American River Stratigraphic and Geomorphic Mapping Report* (2012), Figure 4.10.

⁴¹ *American River Common Features General Reevaluation Report*, Attachment C - Geotechnical Report, 25.

⁴² *American River Common Features General Reevaluation Report*, Attachment C - Geotechnical Report, 18.

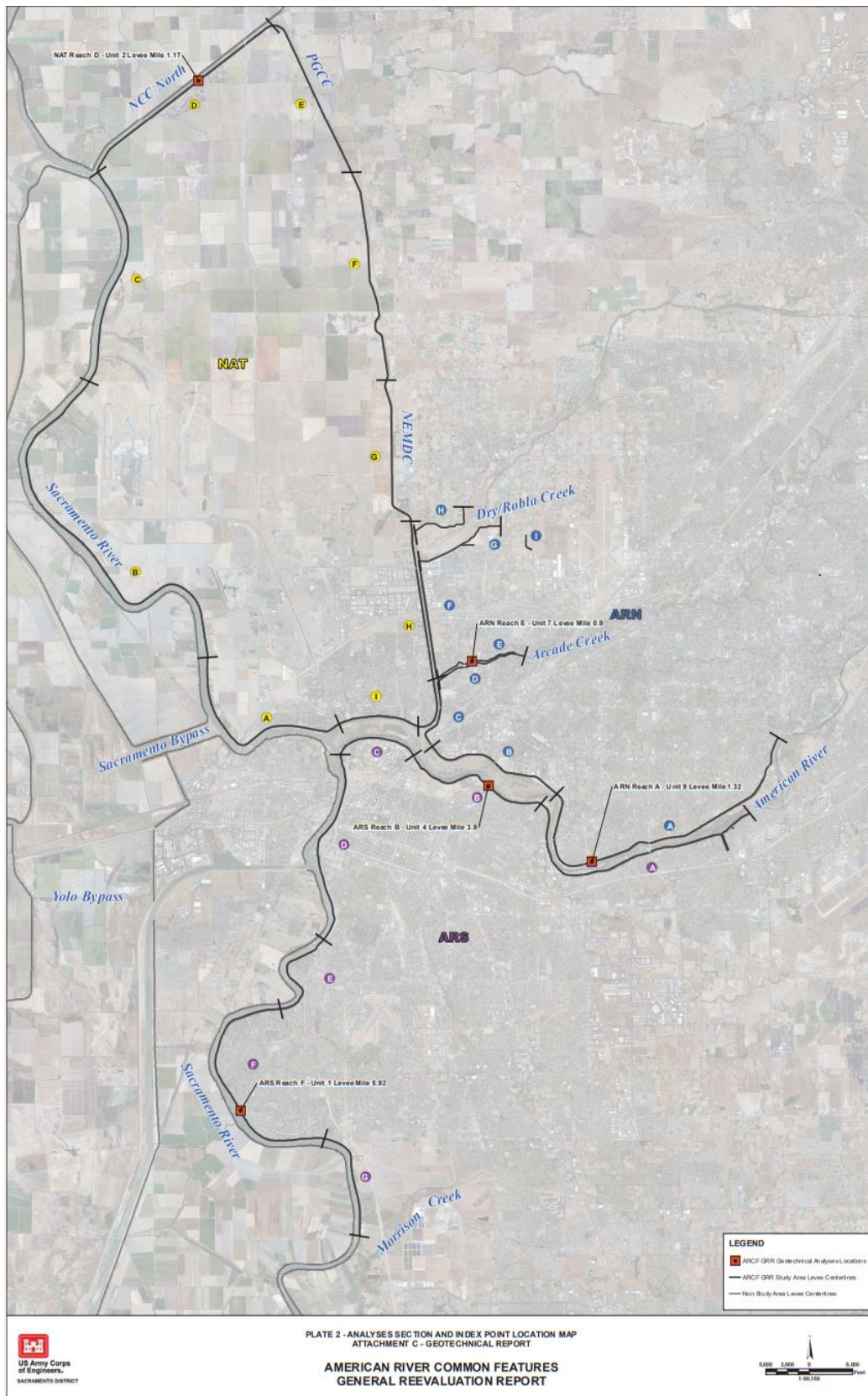


Figure 3: Map of Index Point Locations Considered in Geotechnical Report. Only 2 index points are used for the entire Lower American River

7 The use of a boring near Howe Avenue Bridge to justify work two miles upstream is especially egregious because the *Erosion Protection Report* indicates that the banks upstream of Howe Avenue consist of fundamentally different bed materials than the banks downstream of Howe Avenue. According to the *Erosion Protection Report*, the area between river mile 6.6-7.5 contains “broader areas of scour where the formation is likely more widely exposed in the channel bed or lies concealed beneath a thin cover of active channel only a few feet thick.”⁴³ This unit “contains no bank resistance to lateral erosion and will not contribute to levee stability.”⁴⁴ This is, in other words, an area with highly erodible bed materials. However, the area upstream of Howe Avenue, especially near the entrance of SARA Park (left bank river mile 10.0-10.3) where the Corps proposes to install a launchable rock trench and launchable rock toe, contains significant amounts of erosion-resistant clay hardpan, which the technical documents refer to as the “Pleistocene Fair Oaks Formation.”⁴⁵ The only modeling results USACE provides for the area containing Pleistocene Fair Oaks Formation, between river mile 7 and river mile 11, indicate that “for all the flows simulated the sheer stress in the reach with locally exposed hard material is below the critical stress for erosion of moderately resistant material (clay and cemented sand with silt). **Therefore, significant scour below this erosion resistant material/surface is not anticipated.**”⁴⁶

⁴³ *American River Common Features General Reevaluation Report*, Attachment E, Erosion Protection Report, 32.

⁴⁴ *Ibid.*

⁴⁵ *American River Common Features General Reevaluation Report*, Attachment C - Geotechnical Report, 25, 38. *American River Common Features General Reevaluation Report*, Attachment E, Erosion Protection Report, 12, 31, 32.

⁴⁶ *American River Common Features General Reevaluation Report*, Attachment E, Erosion Protection Report, 24.



Figure 4: Erosion Resistant Pleistocene Fair Oaks Formation within the left bank river mile 10.0-10.3 area where USACE proposes 2 Launchable Rock Toes and a Launchable Rock Trench. The launchable rock trench, adjacent to this formation, cuts through a forest.



Figure 5: Forest that launchable rock trench at left bank river mile 10.0-10.3 would remove.

Yet in the appendices for the 2016 Final EIS-EIR, USACE only provided specific velocity data for RM 6 and RM 7.5.

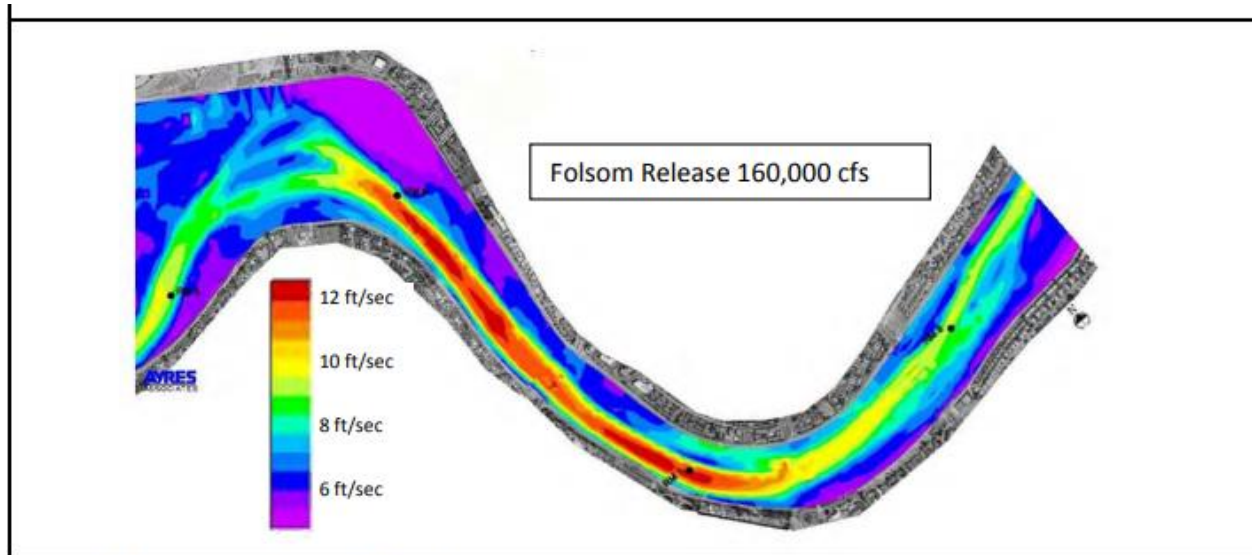


Figure 21. American River Velocity Contours.

Figure 6

As for the rest of the Lower American River, USACE simply states that average velocities range from 6 to 9 ft/sec.⁴⁷ Even at those velocities, biotechnical and bioengineering measures are feasible. Given that velocities along the banks can vary from 0-12 ft/sec during a 160,000 cfs event, an average velocity for the entire LAR cannot meaningfully justify nor exclude particular measures for particular segments.

Proposing destructive launchable riprap for Contract 3B after failing to follow their expert recommendations conflicts with the laws which aim to protect the environment in general and the Lower American River in particular. The American Parkway Plan requires designing erosion projects “to minimize damage to riparian vegetation and wildlife habitat.”⁴⁸ CEQ demands agencies consider feasible mitigation that will prevent or eliminate damage to the environment.⁴⁹ Mitigation includes “avoiding an impact by not taking a certain action or parts of an action.”⁵⁰ Without carefully accounting for the erosion resistant areas of the LAR in its analysis, USACE is proposing potentially unnecessary erosion measures and therefore failing to minimize damage to the environment. CEQA makes it “a duty for public agencies to avoid or minimize environmental damage where feasible.”⁵¹ According to the California Supreme Court, CEQA was intended to be interpreted in such a manner as to afford the fullest possible protection to

⁴⁷ ARCF 2016 Final EIS-EIR (Updated May 2016), Appendix G – Biological Assessment, p. 93-94.

⁴⁸ *Sacramento County American River Parkway Plan 2008*, Section 4.16, p. 85.

⁴⁹ Executive Office of the President, Council on Environmental Quality, Memorandum for heads of Federal Departments and Agencies, January 14, 2011, p. 2.

⁵⁰ *Ibid*, 4.

⁵¹ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15021(a).

the environment within the reasonable scope of the statutory language.⁵² It is not unreasonable for USACE to carefully determine where they can avoid environmentally destructive measures by taking into account geologic mappings already in its possession. Ignoring those geologic mappings, intentionally or not, biases USACE towards the most sweeping and environmentally destructive erosion measures.

Bias for riprap is also evident in the expert opinions USACE decided to share, and withhold, about erosion risk in the Lower American River. To determine risk of levee failure for each segment of the Lower American River, USACE contracted with HDR Ford Engineers, who elicited expert opinions and then used those opinions to estimate probabilities of levee failure.⁵³ USACE incorporates by reference the *Lower American River - Subreach 1, 3, and 4* technical memorandum but not the more expansive document from which the memo is based, *Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4*.⁵⁴ This is a regrettable decision considering the latter document contains the full range of expert opinions for tier classification, including what they see as favorable conditions. By contrast, the technical memo typically only pulls opinions on the adverse conditions for the highest risk segments, classified as tier 1. Not citing the document with the full range of expert opinions on both adverse and favorable conditions creates the illusion that there is consensus for USACE's singular measure of launchable rock where none exists. Experts might have agreed on risk rating, although even this proposition is dubious. For left bank river mile 9.8-10, one expert wrote "yikes" while another indicated he was a no-vote on intervention.⁵⁵ Likewise, despite its tier 1 classification, one expert noted that the left bank river mile 10.4-10.5 segment enjoyed a history of good performance.⁵⁶ CEQA does not require "technical perfection in an EIR, but rather adequacy, completeness, and a good faith effort at full disclosure."⁵⁷ CEQA also concedes that "disagreement among experts does not make an EIR inadequate."⁵⁸ Nevertheless, CEQA requires that the EIR "summarize the main points of disagreement among the experts."⁵⁹

9 Neglecting to cite "Lower American River Erosion Conditional Risk Assessment," as well as neglecting to summarize the substantial points of disagreement among the experts it elicited, deprives the public and policy makers of necessary information to determine the adequacy of USACE's very limited proposals which lack biotechnical and bioengineering alternatives.

Experts notably disagreed about USACE's insinuation that the banks all along the Lower American River are subject to high river velocities. Some of the experts noted low velocities for several areas where USACE has proposed launchable riprap. For left bank river mile 9.8-10.0, where USACE proposes a launchable rock toe, one expert stated that water velocities were too

⁵² *Friends of Mammoth v. Board of Supervisors*, 8 Cal. 3d 247.

⁵³ HDR and Ford Engineers, *Lower American River - Subreach 1, 3, and 4 Tier Classification Technical Memorandum*, (Sacramento, November 13, 2019).

⁵⁴ 2023 ARCF Draft SEIS/SEIR, 10-1.

⁵⁵ HDR David Ford Consulting Engineers, *Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4*, (2019), E38.

⁵⁶ *Ibid*, E48.

⁵⁷ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15003.

⁵⁸ *Ibid*, 15151.

⁵⁹ *Ibid*.

low on levee at 200 year flood flows, 160,000 cfs, to cause serious damage.⁶⁰ For left bank river mile 10.0-10.3, where USACE proposes two launchable rock toes and a launchable rock trench, two of the experts cited low velocities on levee and upper bank, with one noting “water velocities low on levee face at 160 kcfs.”⁶¹ For left bank river mile 10.4-10.5, an expert stated that water velocities were low on the levee at 160 kcfs.⁶²

Such observations are consistent with the velocity contour maps in the *General Reevaluation Report*.⁶³ While these maps show that at 160,000 cfs velocities along the some of the LAR’s banks can reach a significant velocity of 12-13 ft/sec, between left bank river miles 10 and 11, which comprises most of Contract 3B South, estimated velocities along the banks during a 200 year, 160,000 cfs event only range from 0-1 ft/sec to 6-7 ft/sec. At these velocities

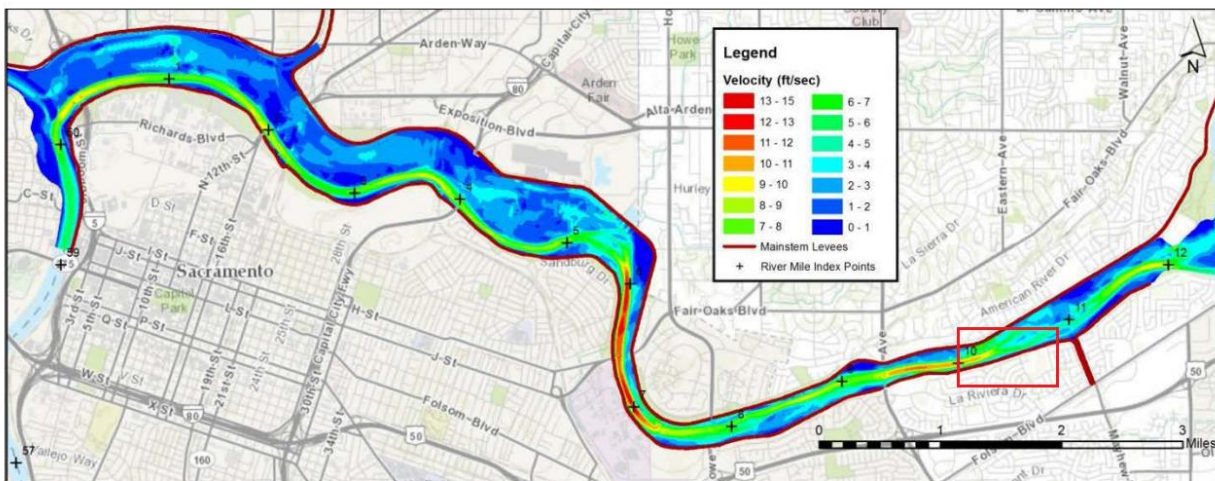


Figure 2-8: Velocities in the Lower American River at a discharge of 160,000 cfs

Figure 7

USACE could have considered several types of lining materials for erosion protection, at least according to table 4-4 of the *Erosion Protection Report*. The permissible velocity for 6-inch gravel/cobble is 4-7.5 ft/sec, 6-8 ft/sec for class a turf vegetation, and some types of soil bioengineering can withstand up to 12 ft/sec.⁶⁴

⁶⁰ HDR David Ford Consulting Engineers, *Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4*, (2019), E38.

⁶¹ *Ibid*, E46.

⁶² *Ibid*.

⁶³ *American River Common Features General Reevaluation Report*, 2-21.

⁶⁴ *American River Common Features General Reevaluation Report*, Attachment E, Erosion Protection Report, 43.

Table 4-4. Permissible shear and velocity for selected lining materials (Fischenich 2001)

Permissible Shear and Velocity for Selected Lining Materials ¹				
Boundary Category	Boundary Type	Permissible Shear Stress (lb/sq ft)	Permissible Velocity (ft/sec)	Citation(s)
<u>Soils</u>	Fine colloidal sand	0.02 - 0.03	1.5	A
	Sandy loam (noncolloidal)	0.03 - 0.04	1.75	A
	Alluvial silt (noncolloidal)	0.045 - 0.05	2	A
	Silty loam (noncolloidal)	0.045 - 0.05	1.75 - 2.25	A
	Firm loam	0.075	2.5	A
	Fine gravels	0.075	2.5	A
	Stiff clay	0.26	3 - 4.5	A, F
	Alluvial silt (colloidal)	0.26	3.75	A
	Graded loam to cobbles	0.38	3.75	A
	Graded silts to cobbles	0.43	4	A
	Shales and hardpan	0.67	6	A
	1-in.	0.33	2.5 - 5	A
<u>Gravel/Cobble</u>	2-in.	0.67	3 - 6	A
	6-in.	2.0	4 - 7.5	A
	12-in.	4.0	5.5 - 12	A
	Class A turf	3.7	6 - 8	E, N
<u>Vegetation</u>	Class B turf	2.1	4 - 7	E, N
	Class C turf	1.0	3.5	E, N
	Long native grasses	1.2 - 1.7	4 - 6	G, H, L, N
	Short native and bunch grass	0.7 - 0.95	3 - 4	G, H, L, N
<u>Temporary Degradable RECPs</u>	Reed plantings	0.1-0.6	N/A	E, N
	Hardwood tree plantings	0.41-2.5	N/A	E, N
	Jute net	0.45	1 - 2.5	E, H, M
	Straw with net	1.5 - 1.65	1 - 3	E, H, M
<u>Non-Degradable RECPs</u>	Coconut fiber with net	2.25	3 - 4	E, M
	Fiberglass roving	2.00	2.5 - 7	E, H, M
	Unvegetated	3.00	5 - 7	E, G, M
	Partially established	4.0-6.0	7.5 - 15	E, G, M
<u>Riprap</u>	Fully vegetated	8.00	8 - 21	F, L, M
	6 - in. d_{50}	2.5	5 - 10	H
	9 - in. d_{50}	3.8	7 - 11	H
	12 - in. d_{50}	5.1	10 - 13	H
<u>Soil Bioengineering</u>	18 - in. d_{50}	7.6	12 - 16	H
	24 - in. d_{50}	10.1	14 - 18	E
	Wattles	0.2 - 1.0	3	C, I, J, N
	Reed fascine	0.6-1.25	5	E
<u>Hard Surfacing</u>	Coir roll	3 - 5	8	E, M, N
	Vegetated coir mat	4 - 8	9.5	E, M, N
	Live brush mattress (initial)	0.4 - 4.1	4	B, E, I
	Live brush mattress (grown)	3.90-8.2	12	B, C, E, I, N
	Brush layering (initial/grown)	0.4 - 6.25	12	E, I, N
	Live fascine	1.25-3.10	6 - 8	C, E, I, J
	Live willow stakes	2.10-3.10	3 - 10	E, N, O
	Gabions	10	14 - 19	D
	Concrete	12.5	>18	H

¹ Ranges of values generally reflect multiple sources of data or different testing conditions.

A. Chang, H.H. (1988). F. Julien, P.Y. (1995). K. Sprague, C.J. (1999).
B. Florineth. (1982). G. Kouwen, N.; Li, R. M.; and Simons, D.B., (1980). L. Temple, D.M. (1980).
C. Gerstgraser, C. (1998). H. Norman, J. N. (1975). M. TXDOT (1999)
D. Goff, K. (1999). I. Schiechl, H. M. and R. Stern. (1996). N. Data from Author (2001)
E. Gray, D.H., and Sotir, R.B. (1996). J. Schoklitsch, A. (1937). O. USACE (1997).

ERDC TN-EMRRP SR-29

Figure 8

Launchable riprap, in short, was most certainly not the only option USACE could consider. USACE instead chose to use overgeneralized data which biases their proposals towards the sole possibility of launchable riprap. Local flood control experts, on the other hand, recognized the feasibility of less destructive biotechnical measures. For left bank river mile 10.4-10.5, the consultants who put together the 2017 Lower American River Streambank Erosion Monitoring

Report for the Sacramento Area Flood Control Agency recommended as a possible solution “cobbles with vegetation or other biotechnical measures such as brush mattress, willow waddles or brush boxes (all supplemented with plantings).”⁶⁵ This is a recommendation USACE should explore in a new SEIS/SEIR.

11 USACE’s velocity contour maps may show even lower velocities along the banks. The quality of the maps seems biased towards justifying the most extreme possible erosion measures, as the maps are too zoomed out to precisely ascertain river flow velocities along the banks, except for river mile 6.6-7.5, which happens to be part of the Lower American River where velocities are fastest along the banks. For this segment of the river, USACE provided high quality, zoomed in maps (Figure 4). None of the other sub-reaches of the Lower American River got such scrupulous treatment. For left bank river mile 10-11, where USACE proposes three launchable rock toes and a launchable rock trench, we can better perceive the river’s flow behavior by looking at the velocity contour maps from the *2017 Lower American River Streambank Erosion Monitoring Report*, which were derived from the same hydraulic modeling as the velocity contour maps provided in the 2016 *General Reevaluation Report* (GRR).⁶⁶ The more high quality maps from the 2017 report show that from 115,000 cfs to 145,000 cfs, there is little change in the velocity of flows along left bank river mile 10 to 11. In both cases, the water is almost stagnant, moving at 0-2 ft/sec for most of the river mile and rising to only about 4-6 ft/sec at around left bank river mile 10.⁶⁷

⁶⁵ MBK Engineers, *2017 Lower American River Streambank Erosion Monitoring Report*, (May 2018), 10.

⁶⁶ Ibid, Appendix B, Velocity Contours. December 2023 ARCF Draft SEIS/SEIR, 4-150, 4-151, 3.3-5. *American River Common Features General Reevaluation Report*, 4-7. *American River Common Features General Reevaluation Report*, Appendix, 47.

⁶⁷ MBK Engineers, *2017 Lower American River Streambank Erosion Monitoring Report*, (May 2018), Appendix B, Velocity Contours, Applied Velocity Lots 115,000 cfs plate 8 and Applied Velocity Plots 145,000 cfs plate 8.

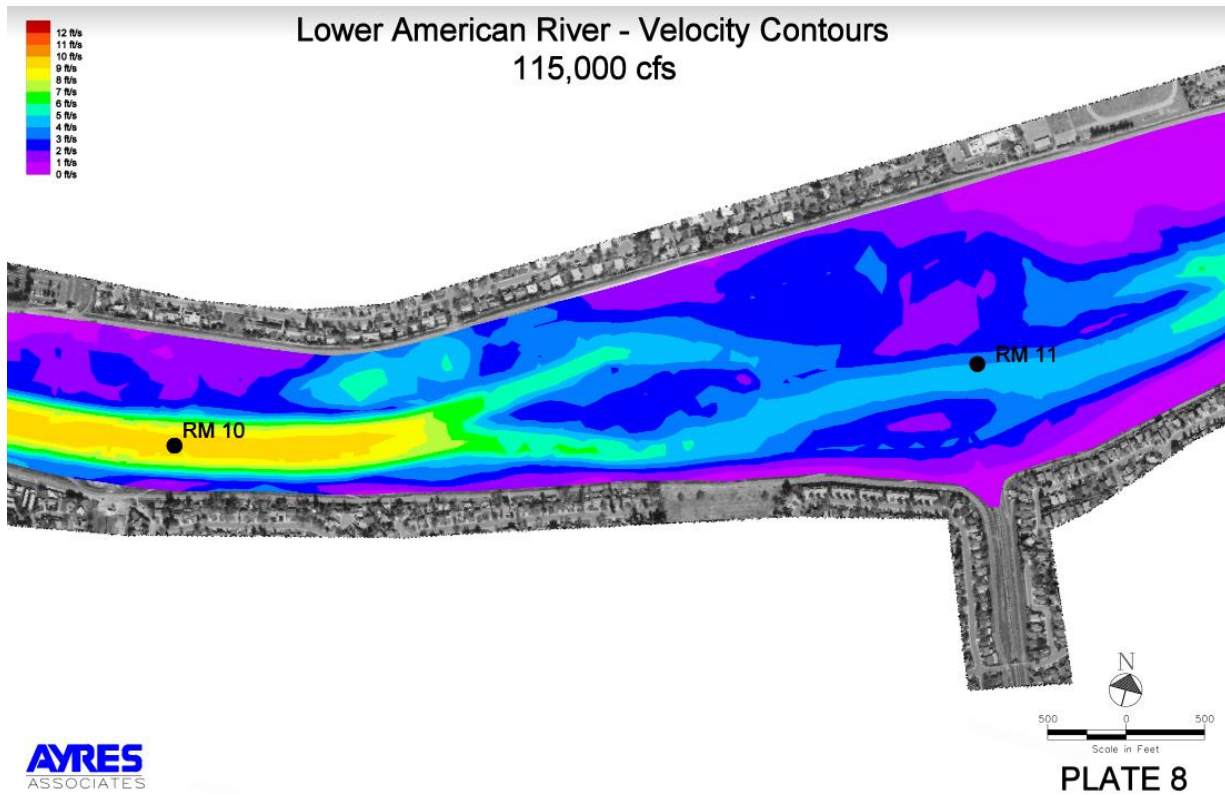


Figure 9

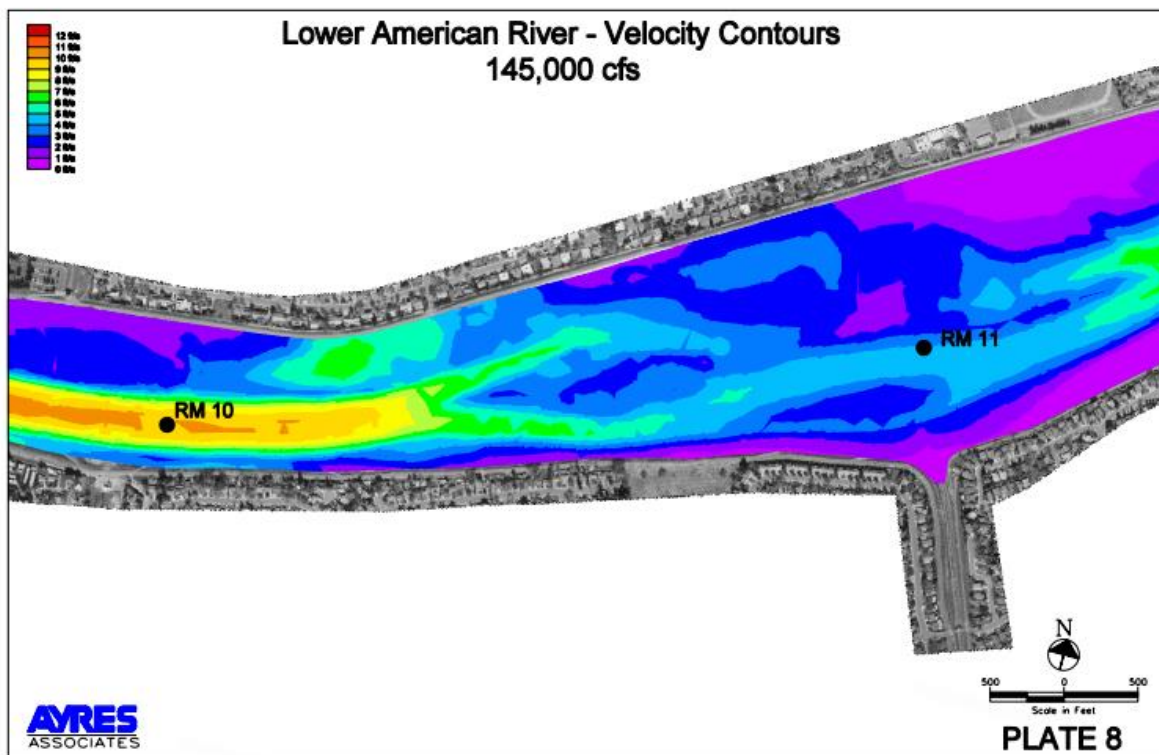


Figure 10

145,000 cfs does not quite get us to the 160,000 cfs mark, but it should be emphasized that there was very little change from 115,000 to 145,000 cfs, that some of USACE's experts noted low velocities near levees at 160,000 cfs between river miles 9.8 and 10.5, and that even the discernable part GRR's low resolution velocity contour maps show that at worst river velocities reach 6-7 ft/sec around left bank river mile 10.

The expert opinions on the favorable conditions created by bank vegetation reinforce the imperative that USACE should and could explore bioengineering alternatives. For left bank river miles 9.8-10, 10.0-10.3, and 10.4-10.5, experts noted the presence of vegetation as a favorable condition. For left bank river mile 10.4-10.5, one expert observed that a favorable condition was "dense veg/root mats" that cover much of the bank, as well as a fully grass levee and a dense shrub mass at the top of the bank that attenuates velocity and wind wave.⁶⁸ Yet another expert highlighted "good past performance" and "vegetation on berm" as a favorable condition for this segment.⁶⁹ According to table 2 of the *2017 Lower American River Streambank Erosion Monitoring Report*, soils with good vegetative cover are resistant against erosion for up to 6-7 ft/sec.⁷⁰



Channel Material	Mean Channel Velocity (fps)
Fine Sand	2
Course Sand	4
Sandy Silt	2
Silt Clay	3.5
Clay	6
Soils with good vegetative cover	6-7
Poor rock (usually sedimentary)	10
Good rock (usually igneous or hard metamorphic)	20

Figure 11: Table 2 - Suggested Maximum Channel Water Velocities

The experts did warn that if erosion took bank vegetation, the risk of levee failure could increase.⁷¹ Experts also expressed concern about encroachment, sill degradation, and bed lowering.⁷² But given that velocities in this area are low and vegetation already protects the

⁶⁸ HDR David Ford Consulting Engineers, *Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4* (2019), E48.

⁶⁹ Ibid.

⁷⁰ MBK Engineers, *2017 Lower American River Streambank Erosion Monitoring Report*, (May 2018), 5.

⁷¹ HDR David Ford Consulting Engineers, *Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4* (2019), E46.

⁷² Ibid.

bank, USACE could explore alternatives that preserve, enhance, and augment on-site vegetation instead of removing almost all vegetation. USACE could even explore the possibility of enlisting the public—such as environmental volunteer organizations—in plans to maintain the vegetation on streambanks. This would fulfill CEQ's command that public involvement “should be fully provided for in the development of mitigation and monitoring procedures.”⁷³ USACE could also consider techniques which recruit sediment. One example of this being done in a high energy river downstream of a dam (such as the Lower American River) was on the Middle Green River in Washington, where, instead of hard armoring, King County built a bioengineered bank stabilization project by using logs at the river's toe secured to the bank with coir fabric, soil wraps, and vegetation, adding roughness and recruiting sediment. One of the project designers assured that “this type of technique is what I would advocate even in a high energy environment.”⁷⁴

Much is at risk if USACE neglects to explore bioengineering alternatives that will work with nature instead of against it, including public safety. **Research going back nearly a century indicates that riparian forests play a vital role in bank stability and flood control.** Over 95 years ago an engineer observed that during the Great Mississippi flood of 1927, levees only failed where trees had been removed:

“It was interesting to inspect various sections of the big flood. Wherever a heavy stand of native willows or other forest trees were growing in the burrow pit and on the land between the river the erosion from wave action and current was very slight and on miles of levee where tree growth existed no injury was caused whatsoever. **On the contrary, where land was cleared and there were no obstructions to break the waves, injury and destruction were evident along the entire distance.**”⁷⁵

Likewise, studies of the catastrophic 1993 Missouri Flood found a direct correlation between the width of riparian forest and the likelihood of levee failure. Where riparian forest had been cleared or thinned, levees were 74-88% more likely to fail.⁷⁶ Trees also play a preeminent role in armoring banks from erosion. According to Rood et al (2014) mature riparian trees are highly effective at preventing erosion, even superior to grass, and they recommend that “riparian forests should be conserved to provide bank stability and to maintain an equilibrium of river and floodplain dynamics.”⁷⁷ Besides armoring banks, trees make armor less necessary by

⁷³ Executive Office of the President, Council on Environmental Quality, Memorandum for heads of Federal Departments and Agencies, January 14, 2011, p. 13.

⁷⁴ FEMA, *Engineering with Nature: Alternative Techniques to Riprap Bank Stabilization*, 11-12.

⁷⁵ O.S. Scheifele, 1928. “Protection of River Banks and Levees.” *The Canadian Engineer*: 123.

⁷⁶ J.P. Dwyer and D.R. Larsen, 1997. “Value of Woody River Corridors in Levee Protection Along the Missouri River in 1993.” *Journal of the American Water Resources Association*.

https://www.researchgate.net/publication/230348698_Value_of_Woody_River_Corridors_in_Levee_Protection_Along_the_Missouri_River_in_1993. Stephen B. Allen, John P. Dwyer, Douglas C. Wallace, and Elizabeth A. Cook, 2023. “Missouri River Flood of 1993: Role of Woody Corridor Width in Levee Protection.” *Journal of the American Water Resources Association*.
<https://onlinelibrary.wiley.com/doi/epdf/10.1111/j.1752-1688.2003.tb04416.x>

⁷⁷ S.B. Rood, S.G. Bigelow, M.L. Polzin, K.M. Gill, and C.A. Coburn. (2015). “Biological bank protection: trees are more effective than grasses at resisting erosion from major river floods.” *Ecohydrol*, 8: 772–779. Doi: [10.1002/eco.1544](https://doi.org/10.1002/eco.1544).

redirecting the energy of rivers from the banks towards the center of the channel, thereby reducing scour and erosion. Such a phenomenon was observed almost a century ago by the aforementioned engineer, who remarked: “experience has shown that where a clump of trees were allowed to spring up on the river face of levees eddies were caused and erosion started down stream from trees.”⁷⁸ Late twentieth century modeling has confirmed early twentieth century observations. When Johannes DeVries applied vegetation models specifically for the dimensions of the Sacramento River, looking at areas with and without vegetation on levees, he found that reducing dense vegetation next to levees generally increased the velocity of water, and therefore, the potential for scour.⁷⁹ In 2021 and 2023, an academic team which had worked with the California Department of Transportation incorporated vegetation into a high-fidelity model to account for trees in large-eddy simulations of the Lower American River. They found that dense strands of mature trees had “a significant impact on the computed flow field by diverting the high-velocity core of the flood away from the banks toward the center of the channel.”⁸⁰ Results showed that “velocities in the center of the river increased by approximately 50%” but “were nearly damped out entirely along the banks.”⁸¹ For the case without trees, the flow was “distributed throughout the full river width, with high velocities near the banks.”⁸²

FIGURE 7 Cross-sections were compared along three locations of the American River (a). At Section 1-1, the vegetation model significantly damped out flows along both banks (blue regions) and increased velocities in the centre of the channel (red region) compared to LES without trees (b).

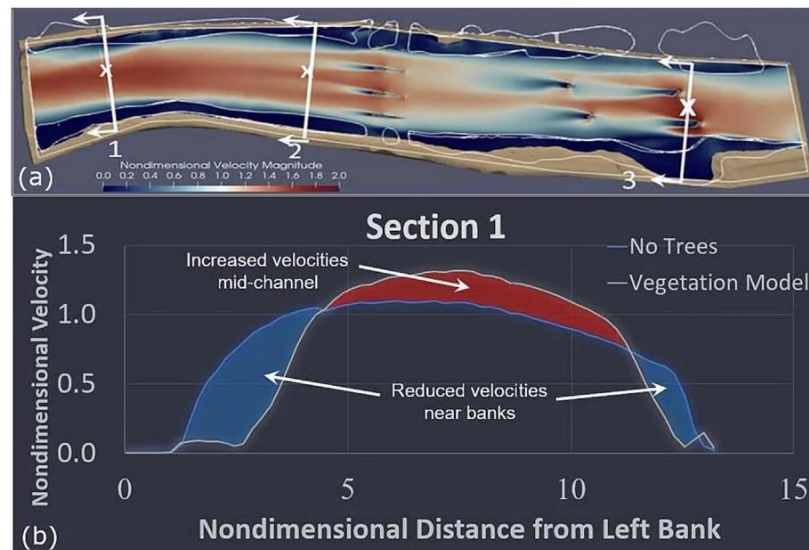


Figure 12

⁷⁸ O.S. Scheifele, 1928. “Protection of River Banks and Levees.” *The Canadian Engineer*: 122.

⁷⁹ Johannes DeVries, *Vegetation Effects on River Hydraulics, Floodway Conveyance & Velocity Response*, SACRAMENTO AREA FLOOD CONTROL AGENCY (Aug. 28, 2007).

⁸⁰ Kevin Flora, Christian Santoni, and Ali Khosronejad. 2021. “Numerical Study on the Effect of Bank Vegetation on the Hydrodynamics of the American River Under Flood Conditions.” *Journal of Hydraulic Engineering*: 05021006-8. [https://doi.org/10.1061/\(ASCE\)HY.1943-7900.0001912](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>: 7

⁸¹ Flora, Santoni, and Khosronejad, 05021006-12.

⁸² Ibid, 05021006-8.



Figure 13: Resident picture of left bank river mile 10.4-10.5 during the 2017 high water event (80,000 cfs). The water was so stagnant his dog could wade in it.

USACE still cites as the basis for its Contract 3B proposal the 2-D hydraulic modeling from the 2004 Ayres Report, *Lower American River, Erosion Susceptibility Analysis for Infrequent Flood Events*.⁸³ This outdated 2-D hydraulic model almost certainly overestimates velocities along banks with large trees. As Khosronejad's team explained:

Incorporating vegetation into high-fidelity computational models is imperative for obtaining accurate modeling results. In this study, when trees were accounted for in large-eddy simulations, a drastic effect on redistributing the high-velocity flow away from the banks and increasing its magnitude near the center of the American River was observed.⁸⁴

Based on modern, advanced scientific hydraulic modeling simulations on the Lower American River, we can expect that removing 685 trees will make erosion much worse for years to come by allowing river flows to crash against the banks during high water events. Such a

⁸³ December 2023 ARCF Draft SEIS/SEIR, 4-150, 4-151, 3.3-5. *American River Common Features General Reevaluation Report*, Appendix, 47.

⁸⁴ Kevin Flora, Christian Santoni, and Ali Khosronejad. 2021. "Numerical Study on the Effect of Bank Vegetation on the Hydrodynamics of the American River Under Flood Conditions." *Journal of Hydraulic Engineering*. 05021006-12. [https://doi.org/10.1061/\(ASCE\)HY.1943-7900.0001912](https://doi.org/10.1061/(ASCE)HY.1943-7900.0001912).

phenomenon is already coming to fruition. Some of USACE's soil-filled revetments suffered significant erosion in 2023 from just 30,000 cfs flows.



Figure 14

Therefore, USACE risks increasing erosion potential with mass tree removal in the Contract 3B area.

Even though USACE obtained approval for the 2016 Record of Decision, they should still explore a full range of alternative measures, especially considering the significant passage of time since 2016 and the fact that new information is available (e.g. the 2021 and 2023 Khosronejad studies discussed above) contradicting the 2016 findings. CEQ directs agencies to carefully reexamine an EIS when a proposal has not been implemented within five years of the Record of Decision to account for new “information relevant to environmental concerns and bearing on the proposed action or its impacts.”⁸⁵ As already outlined, **in the 7+ years since the Chief of Engineers issued the 2016 ROD, new Caltrans commissioned research has shown that river velocities along the banks of the Lower American River are significantly slower where there are mature trees than what had been previously indicated by older models. Considering that USACE ruled out alternative measures because of fast river velocities, it is critical for them to now consider this more recent research.** Furthermore, the mandate to identify the least environmentally destructive approach applies whenever during any public review process. As CEQ makes clear, the purpose of the review process is for the

⁸⁵ Council on Environmental Quality, *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations*, (March 23, 1981, Amended 1986).

public and other agencies to assist the lead agency in developing and determining environmentally preferable alternatives.⁸⁶ If an alternative is identified in public comments that is not unreasonable, CEQ demands lead agencies to issue a new SEIS to explore that alternative.⁸⁷ Finally, USACE assured citizens concerned about their overly broad, one-size-fits all proposals in the 2016 EIS/EIR that before initiating work on individual contracts and project segments, USACE would explore a fuller range of alternatives. As USACE wrote to Matthew Carr, after analyzing individual segments of the LAR, “if some sort of bank protection is determined to be necessary, other options to reduce impacts, including bioengineering measures, will be analyzed.”⁸⁸ Not only did USACE break its promise to analyze bioengineering measures in supplemental EIS/EIR’s, but when the EPA suggested in the 2022 Public Scoping comments that USACE offer bioengineering alternatives in the 2023 SEIS/SEIR, USACE dismissively responded that it had already explored alternatives measures in the 2016 GRR.⁸⁹ USACE should heed the EPA’s suggestions. If USACE installs launchable rock toes and trenches where alternative measures were feasible, it not only risks exacerbating erosion, but it could also irreparably damage precious resources of the American River Parkway.

One of the American River Parkway’s precious resources that USACE’s proposal endangers is heritage oak trees. CEQA states that “knowledge of the regional setting is critical to the assessment of environmental impacts.”⁹⁰ Thus, **“special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project.”**⁹¹ **Heritage Oaks constitutes such a rare and special resource for Sacramento County, so much so that they are protected by law.** The Sacramento County Code defines a “heritage tree” as a “California oak tree growing on any land in Sacramento County, including privately owned land, with a trunk sixty inches or greater in girth measured four and one-half feet above the ground.”⁹² The Sacramento County Tree Ordinance decrees that “in order to promote the health, safety, and enhance the beauty and general welfare of Sacramento County,” it shall be the policy of the County “to provide for the **special protection** of heritage and landmark trees within the unincorporated area of the County.”⁹³ Contract 3B South applies entirely within the unincorporated area of Sacramento County. The December 2023 ARCF Draft SEIS/SEIR lists the Sacramento County Tree Ordinance as one of the state and local plans which govern activities within this project area.⁹⁴ There is no other mention of the Sacramento County Tree Ordinance in the 2023 SEIS/SEIR, even though USACE’s proposal to remove hundreds of trees in the Contract 3B South Area is inconsistent with the

⁸⁶ Ibid.

⁸⁷ Ibid.

⁸⁸ Letter to Matthew Carr from Josephine R. Axt, May 24, 2016, in ARCF Final EIS-EIR - Jan. 2016 (Updated May 2016), Appendix F-Public Involvement. P. 1.

⁸⁹ 2023 ARCF Draft SEIS/SEIR, Appendix A. Nepa Scoping Materials, Appendix D. Response to Comment Number 15-1.

⁹⁰ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15124(c).

⁹¹ Ibid.

⁹² Sacramento County, California County Code, Chapter 19.04.030.

⁹³ Ibid, Chapter 19.04.010.

⁹⁴ December 2023 ARCF Draft SEIS/SEIR, 1-7.

17 goals and purpose of Sacramento County's tree code. **Considering that some of the heritage trees in the area of Contract 3B South are over 300 years old, their removal would constitute an essentially "unmitigable" impact on the visual and aesthetic resources of the Parkway.**



Figure 15: Heritage Trees in the Project Area of Contract 3B South

supporting
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Given that the Sacramento County Tree Ordinance affords special protection to heritage trees within the unincorporated area of Sacramento County, dozens of which live in the Contract 3B South area, one would expect the SEIS/SEIR to address potential impacts that pertain specifically within the unincorporated area of Sacramento County. There is no distinction in this SEIS/SEIR made between the impacts on heritage trees in unincorporated Sacramento County and in the city of Sacramento, which does not provide for the same level of protection to heritage trees. USACE treats the environmental impacts of Contract 3B North, which is in Sacramento City, and Contract 3B South, which is in unincorporated Sacramento County, together. This inadequate level of environmental analysis fails to account for how different areas within the project study protect and regard their environmental resources.

The actual discussion of what proportion of heritage trees this project would impact is vague, unclear, and inadequate. In the entire SEIS/SEIR, heritage trees are mentioned on 9 pages.⁹⁵ On some of those pages those mentions are only incidental. As for Contract 3B South specifically, where heritage trees enjoy special protection, the heritage oaks are mentioned on two pages. The first mention, on page 3-5, is that one alternative was dismissed as “it would have required removal of heritage oaks.”⁹⁶ The second mention is on page 3.1-23, where it states that “a buffer of heritage oaks would be kept in place near both Oak Meadow Park and Larchmont Park, so the viewshed of trees from those parks would not be affected.”⁹⁷ The language of the first mention of heritage oaks for Contract 3B South implies USACE has designed the project to avoid removing any heritage oaks. But the language of the second mention implies USACE is only keeping heritage oaks in select areas, such as in front of parks to preserve their “viewshed.” If USACE was not removing heritage oaks in other areas of the project footprint, why would USACE mention keeping a buffer of heritage oaks near Larchmont Park?

18

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#18

USACE simply fails to accurately and concretely communicate likely impacts to large woody vegetation, including heritage trees. The SEIS/SEIR mentions selecting designs to “minimize impacts to heritage oaks” or to “reduce impacts to heritage oaks” or making refinements that would “substantially reduce or avoid several of the significant impacts” to “riparian vegetation, and loss of heritage oaks.”⁹⁸ But does this language of reduction, minimization, and avoidance really convey anything coherent to apprehensive citizens? Would the results resemble reasonable expectations based on USACE’s language? We can use the 2016 FEIS/FEIR, as well as American River Contract’s 1 and 2, to explore the consistency between USACE’s language and what the public might reasonably expect. In the 2016 FEIS/FEIR, USACE asserted that for erosion measures on the American River, removal of waterside vegetation “would primarily consist of shrubby vegetation and grasses” and that “larger trees in the bank protection project” would be “protected in place.”⁹⁹ USACE’s diagrams of a launchable rock trench and of bank protection indicate that most trees would remain on the banks after the installation of riprap. For the “American River Launchable Trench Scenario,”

⁹⁵ Ibid, 3-4, 3-5, 3-42, 3-107, 4-144, 3. 1-3, 3.1-23, 3.1-25, 4.1-40.

⁹⁶ Ibid, 3-5.

⁹⁷ Ibid, 3.1-23.

⁹⁸ Ibid, 3-5, 3-107.

⁹⁹ ARCF Final EIS-EIR - Jan. 2016 (Updated May 2016), 104. *American River Common Features General Reevaluation Report*, 4-12.

figure 1 of the Final EIS/EIR (figure 4-9 in the *General Reevaluation Report*) shows that tree removal would only occur on the levee itself and at the base of the levee.¹⁰⁰ It indicates that USACE would spare most trees on the riparian bench and on the natural levee slope. For “American River Bank Protection Scenario,” no part of the bank is highlighted for vegetation removal or tree clearing.¹⁰¹ From these diagrams, an apprehensive citizen could reasonably conclude USACE would remove few trees, if any at all, while installing either launchable rock trenches or bank protection.

American River Common Features
Final EIS/EIR

December 2015

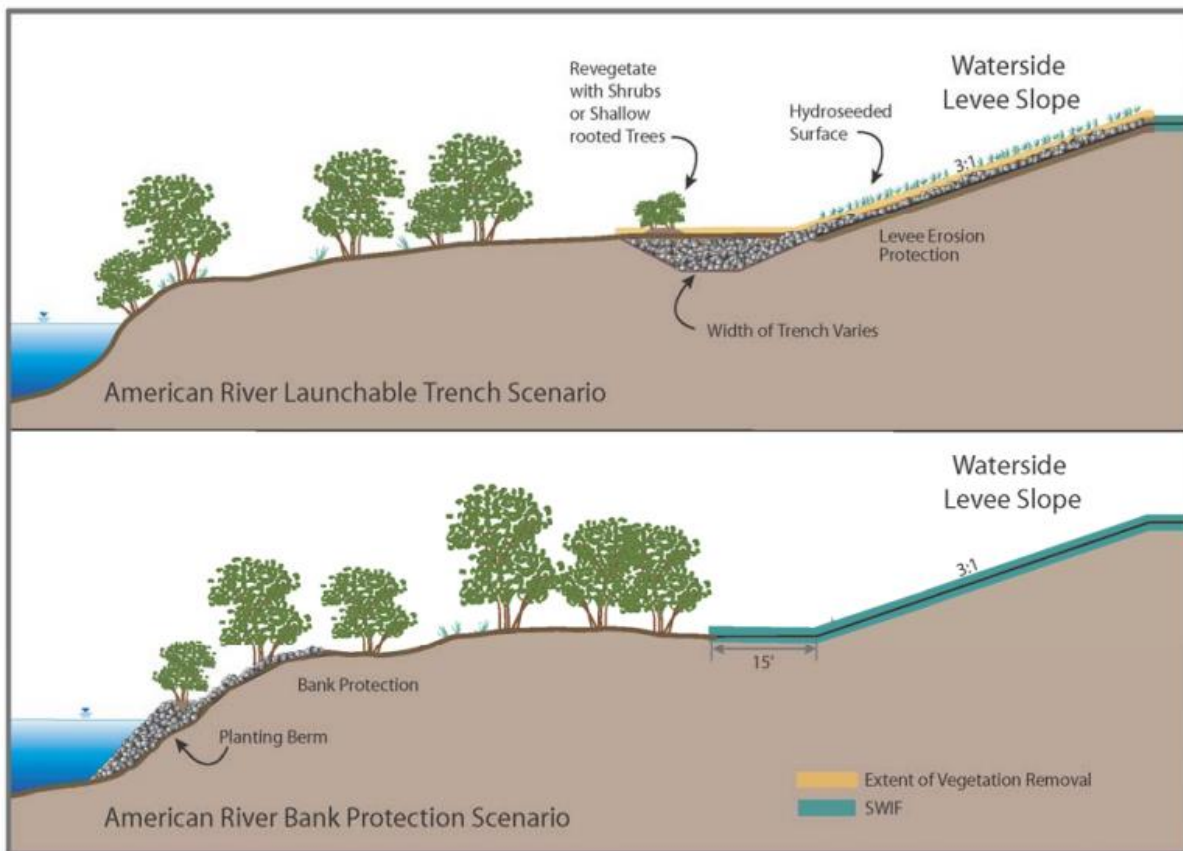


Figure 1. Bank Protection and Launchable Rock Trench Typical Design.

Figure 16

USACE has added new kinds of riprap since the 2016 FEIS/FEIR, but site 2-1 of American River Contract 1 contained the measures proposed for the Lower American River in 2016, Bank Protection and Launchable rock trenches.¹⁰² Because it contained no new measures, USACE issued a supplemental environmental assessment for American River Contract 1 instead of a

¹⁰⁰ Ibid, 37.

¹⁰¹ ARCF Final EIS-EIR - Jan. 2016 (Updated May 2016)

¹⁰² American River Contract 1 Final SEA/SEIR (April 2022), 2-2, 2-8.

supplemental environmental impact statement, which NEPA would require if there were significant impacts not anticipated in the original environmental impact statement.¹⁰³ In other words, American River Contract 1 is what USACE envisioned when it proposed bank protection riprap and launchable rock trenches for the Lower American River in the *General Reevaluation Report*. Here are some pictures USACE provided for the Lower American River Task Force at their March 2023 public meeting.¹⁰⁴



Figure 17

¹⁰³ National Environmental Policy Act of 1969, Sec. 106(a)(2).

¹⁰⁴ <https://www.waterforum.org/wp-content/uploads/2023/03/LARTF-Mar-2023-Slides-upd-3-23-23rdx.pdf>.



CONTRACT 1 (SITE 2-1)

24



Figure 18

Not a single shrub nor tree remained at site 2-1 after USACE installed the launchable riprap. In the SEIS/SEIR for American River Contract 2, USACE stated it would “minimize the removal of existing riparian vegetation” and that “impacts to forested wetlands will be minimized to the greatest extent feasible.”¹⁰⁵ The following picture shows the most extensive work USACE did under American River Contract 2 at Site 2-3.



Figure 19

¹⁰⁵ American River Contract 2 Final SEIS/SEIR - September 2021, 3-97, 5-7.

Once again, USACE's measures left not a single shrub nor tree. Based on the little information USACE provides to the public, I cannot determine whether USACE could have saved at least one tree on these slopes. What I can say is that if somebody told me they were going to minimize forest tree removal, or that large trees would be protected in place, and in the end no trees remained, I would feel like I had been bamboozled. The aftermath of these projects contradicts USACE's figures on launchable rock trenches and bank protection when it comes to trees. As for minimizing vegetation loss on American River Contract 2, whose designs deviated from the 2016 GRR, USACE's language may or may not be technically accurate, but it conveyed nothing of the actual impacts. **If no trees will remain in a segment, USACE should state that. If only a few trees will remain in a section after construction, USACE should state that.** Likewise, if most of the trees will remain, USACE should state that. But "minimizing vegetation loss" tells the public nothing about how much forest will be lost and how much the visual resources of the Parkway will be impacted.

For the 2023 SEIS/SEIR, USACE adds launchable rock toes and tiebacks, features not included in the *General Reevaluation Report*, but USACE claims these new measures "are similar enough in method and location on the levee to the erosion protection methods described in the No Action Alternative that the visual impact from the design refinements would be similar to what was already analyzed in the No Action Alternative."¹⁰⁶ Based on the denuded landscapes of American River Contract's 1 and 2, the projected similarity of the 2023 proposed measures to the 2016 proposed measures is very concerning. The results of past ARCF projects make it reasonable to assume that USACE will remove virtually all the riparian forest, including dozens of beloved heritage oak trees, in the Contract 3B area despite the language of avoidance and minimizing damage.

USACE should consider that, in the words of the California Supreme Court, an "EIR is intended to demonstrate to an apprehensive citizenry that the agency has in fact analyzed and considered the ecological implications of its action."¹⁰⁷ USACE's vague and contradictory language as regards trees in general and heritage trees in particular for the 2023 SEIS/SEIR does not demonstrate more than a perfunctory consideration of ecological implications, especially since concerns about riparian forest removal were raised for the 2016 EIS/EIR. In a letter dated February 22, 2016, an apprehensive citizen lamented that it would not be possible to evaluate the effectiveness of USACE's mitigation for cutting down forest "without knowing what sections of forest will be cut and what sections will be replaced on the same site versus replaced nearby versus replaced on a distant site. In short, the Corps is saying, 'trust us to do the right thing.'"¹⁰⁸ With so little detail on heritage oaks, USACE is still asking the public to just trust it to do the right thing. CEQA requires that the degree of specificity in an EIR "correspond to the degree of specificity involved in the underlying activity which is described in the EIR."¹⁰⁹ USACE is cutting down specific forests and specific heritage oaks, but it provides few details on its removals in the SEIS/SEIR. Based on the discrepancy between its language in the 2016

¹⁰⁶ 2023 ARCF Draft SEIS/SEIR, 3.1-24.

¹⁰⁷ *People ex rel. Department of Public Works v. Bosio*, 47 Cal. App. 3d 495.

¹⁰⁸ Letter from Matthew Carr, Graham Brownstein, et al, in ARCF Final EIS-EIR - Jan. 2016 (Updated May 2016), Appendix F-Public Involvement.

¹⁰⁹ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15146(a).

Final EIS/EIR, the language in American River Contract 2, and the actual denuded landscapes around Sac State, an apprehensive citizen will find no relief when USACE assures them that they are designing these projects to minimize loss to vegetation and heritage oaks.

19
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Providing the public a clearer indication in the SEIR/SEIS of how many trees USACE will remove, what type of trees they will remove, and which segments of the LAR will suffer the most tree removal is feasible for USACE. At the December 12, 2023 public presentation for the Lower American River Task Force, USACE told the public they were going to remove 522 trees for Contract 3B South and 163 trees for Contract 3B North.¹¹⁰ USACE could not provide this information to the public unless they knew either exactly every tree they were going to cut down, or at least mapped out all the areas in the project footprint and estimated the relative density of trees in each segment. USACE neglected to provide the data on tree removal in the Draft SEIS/SEIR, even though 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.**”¹¹¹ Relevant information also includes “maps, plot plans, and diagrams.”¹¹² CEQA clarifies that an EIR’s sufficiency is to be reviewed in light of what is feasible. USACE could easily provide the public with a tree inventory map, or a map which indicates through a color-coded intensity key what minimum proportion of trees they plan to remove in each segment. No such map exists in the SEIS/SEIR, although USACE was able to provide a tree inventory map upon request in September of 2023 that marked every tree in the Contract 3B area along with their size. Such a map would bring USACE closer to the “sufficient degree of analysis” necessary for decision makers and the public to “make a decision which intelligently takes account of environmental consequences.”¹¹³

¹¹⁰ Lower American River Task Force, December 12, 2023. <https://waterforum.org/wp-content/uploads/LARTF-Dec-2023-Slides.pdf>.

¹¹¹ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15147.

¹¹² Ibid.

¹¹³ Ibid, 15151.



Figure 20: Tree Inventory Map

A week before the end of the public comment period USACE did publish a basic tree survey map to sacleveeupgrades.org. Unlike the map at figure 19, the map USACE publicly posted lacks any detail on tree size.¹¹⁴ It also made no attempt to communicate the extent of tree removal in the project area.

¹¹⁴ LAR C#B trees upstream 20240126, https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/ARCF%20Images/LAR%20C3B%20trees%20upstream%2020240216.pdf?ver=g77S56NjfmSgxT4fSmikkQ%3d%3d. LAR C3B trees downstream 20240126, https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/ARCF%20Images/LAR%20C3B%20trees%20downstream%2020240216.pdf?ver=TEZUt9K9zHiOiXVcV-fdXw%3d%3d.



Figure 21

There is simply insufficient detail in USACE’s tree survey map for an apprehensive citizen to form any coherent notion of how USACE’s erosion measures will impact the riparian forest. It indicates nothing about the size of trees nor which trees will be removed or what proportion of trees in any of the project segments will be removed. An apprehensive citizen could interpret USACE’s parenthetical assurance that “not all trees are to be removed” to mean anything from most trees will remain to all but one tree will be removed. Such a broadly interpretable statement is meaningless. It is a perfunctory disclaimer rather than a sincere attempt at communicating to the public the environmental impacts they could expect on a forest that they hold dear.

20 [USACE provides a low-quality image of the various habitats in the project footprint but fails to distinguish with any detail the different habitats and how much tree loss each segment will suffer.¹¹⁵

¹¹⁵ Ibid, 4.1-2.

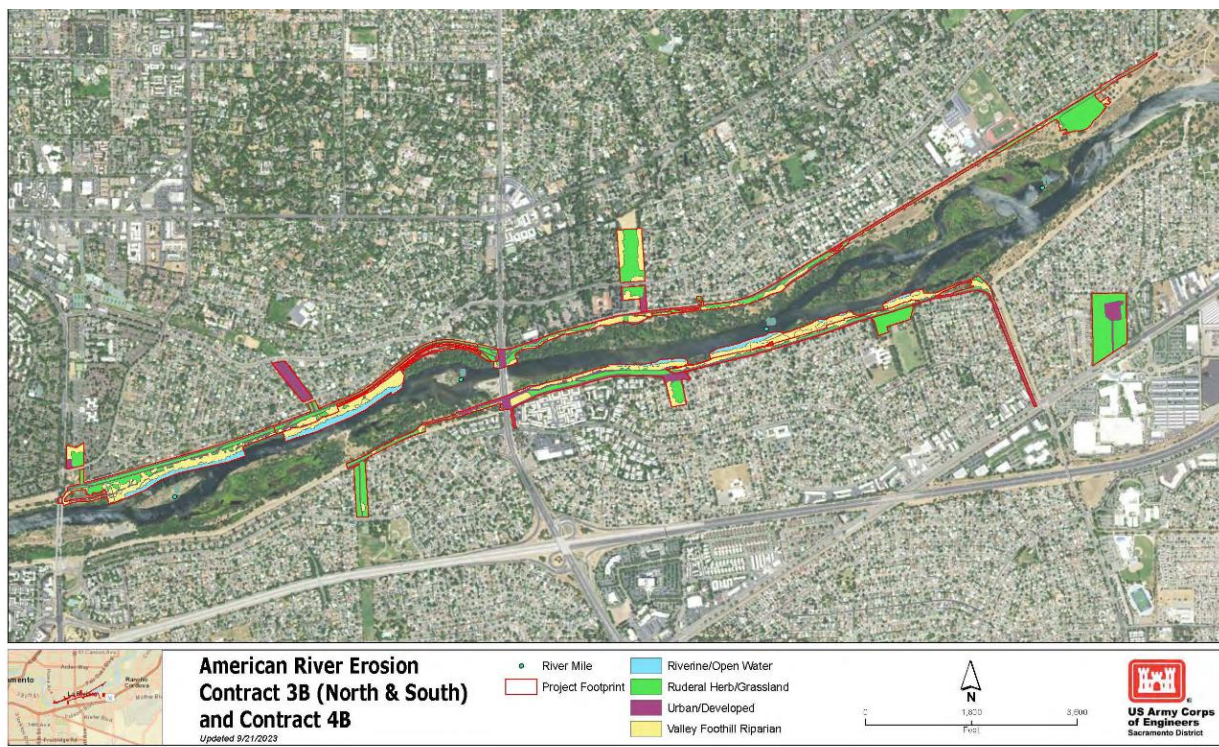


Figure 4.1-1. American River Erosion Contract 3B and 4B Land Cover Types

Figure 22

21

In addition to the low-quality image of the various habitats in the project footprint, USACE provides a vague and confusing map of “project impacts.”¹¹⁶ The project impacts maps identify three kinds of areas within the project footprint: construction access, construction buffer, and staging. USACE leaves it up to the public to interpret these terms. Contrary to standard practice, USACE does not define these terms in the SEIS/SEIR. An apprehensive citizen could reasonably surmise that construction access refers to where construction equipment will be moving and construction buffer to the areas where construction will occur. Yet consider the project impact map for Contract 3B South.

¹¹⁶ 2023 ARCF Draft SEIS/SEIR, 3-30.

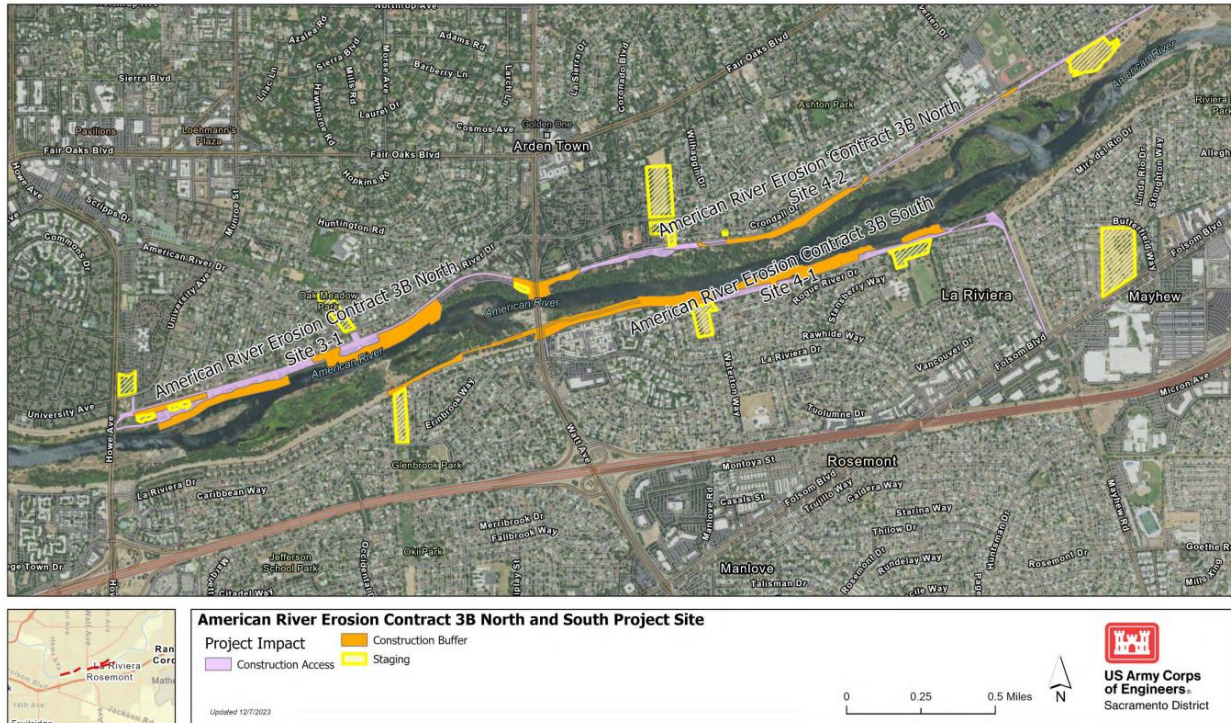


Figure 3.5.2-3. American River Erosion Contract 3B Project Footprint

Figure 23

On the south bank (Contract 3B South) all the bank protection and launchable riprap are proposed for the area between Larchmont Community Park and the Watt Bridge. However, there are staging areas to the west of the project area at Glenbrook Park Access and to the east of the Project area at a private parcel. The area between Larchmont Community Park and the Mayhew Canal is colored purple, indicating “construction access.” This makes sense. Though no construction is scheduled between Larchmont Park and the Mayhew Canal, trucks may have to use the canal and the levee leading to Larchmont Park to transport materials to and from the staging area along Folsom Blvd.



Figure 24

As with the area between Larchmont Park and Mayhew Canal, the area between Watt Bridge and Glenbrook River Access is not slated for erosion protection measures, but trucks will need to use this area to transport materials to and from the project area. Unlike the area between Larchmont Park and Mayhew Canal, the area between Watt and Glenbrook River Access is colored orange, indicating it is a “construction buffer” zone.

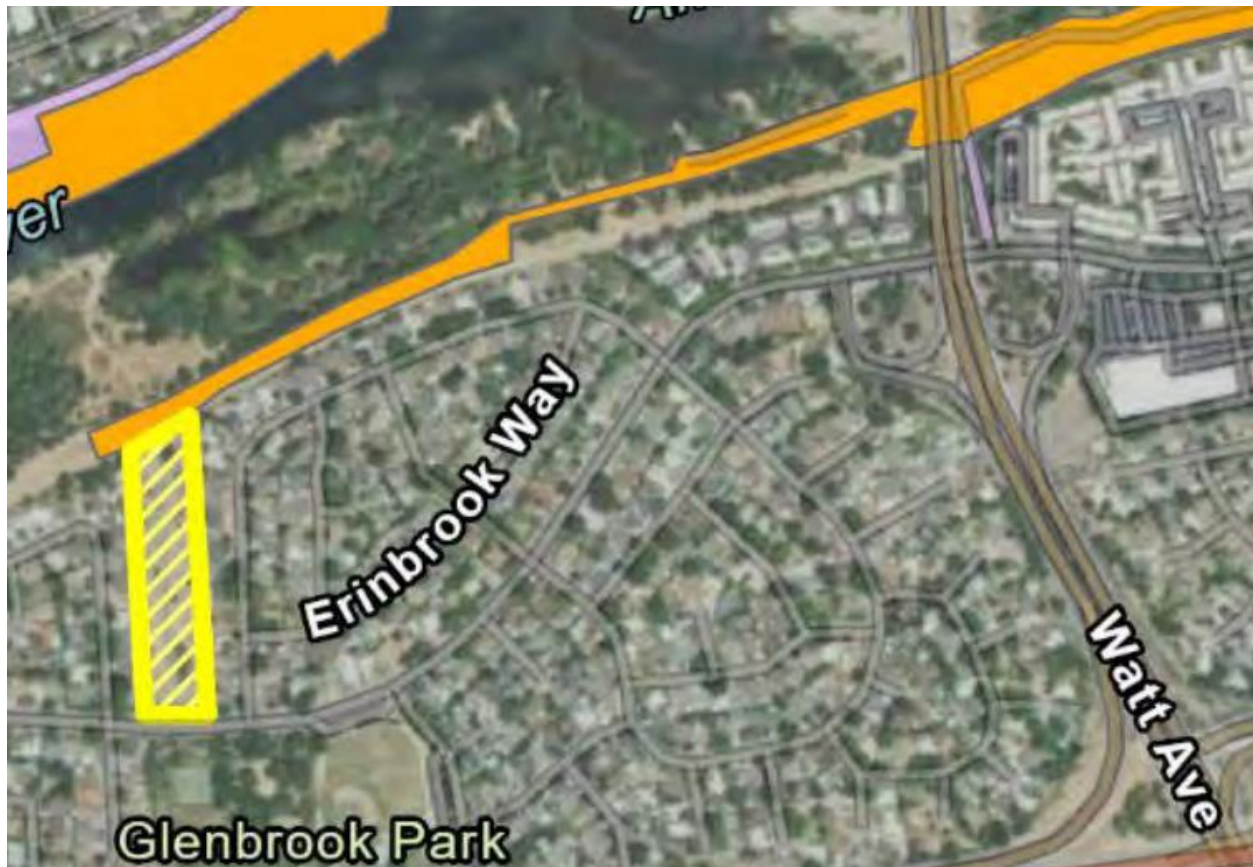


Figure 25

What is an apprehensive citizen supposed to make of these differences? Why is the non-project area between Watt and Glenbrook River Access labeled a construction buffer zone while the non-project area between the Mayhew Drain and Larchmont Park is labeled a construction access zone? There is no effort on USACE’s part to clearly communicate what this figure means and what implications construction access and construction buffer zones will have for residents near the Contract 3B South footprint.

USACE’s disregard for public apprehension is evident in their decision to include so many projects/contracts in this one SEIR/SEIS. Whereas all previously proposed ARCF contracts received their own SEIS/SEIR or SEA/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 2023 ARCF Draft SEIS/SEIR

contains no less than eight major projects, contracts, and subcontracts—including American River Erosion Contract 3B North, American River Erosion Contract 3B South, American River Erosion Contract 4A, American River Erosion Contract 4B, American River Mitigation Site, Maggie Creek Project, American River Erosion Contract 3, and Sacramento River Mitigation Site.¹¹⁷ The consequences of this decision is that the 2023 Draft SEIS/SEIR is both exceedingly long (over 1700 pages of report and appendix) and exceedingly superficial. The main Draft SEIS/SEIR report may be over 900 pages, but that is only an average of 117 pages per contract/project. The Draft SEIS/SEIR Report for American River Contract 2 is just 311 pages, but since it only covers one contract, its analysis is almost three times as long as the average for the projects/contracts included in the 2023 Draft SEIS/SEIR. This more thorough and thoughtful analysis is evident in the detailed site by site diagrams found in the Draft Report for American River Contract 2, which are lacking in the 2023 Draft SEIS/SEIR. For instance, the following diagram from the Draft SEIS/SEIR for American River Contract 2 shows exactly how the soil filled revetments will look like under the Howe Avenue Bridge.¹¹⁸

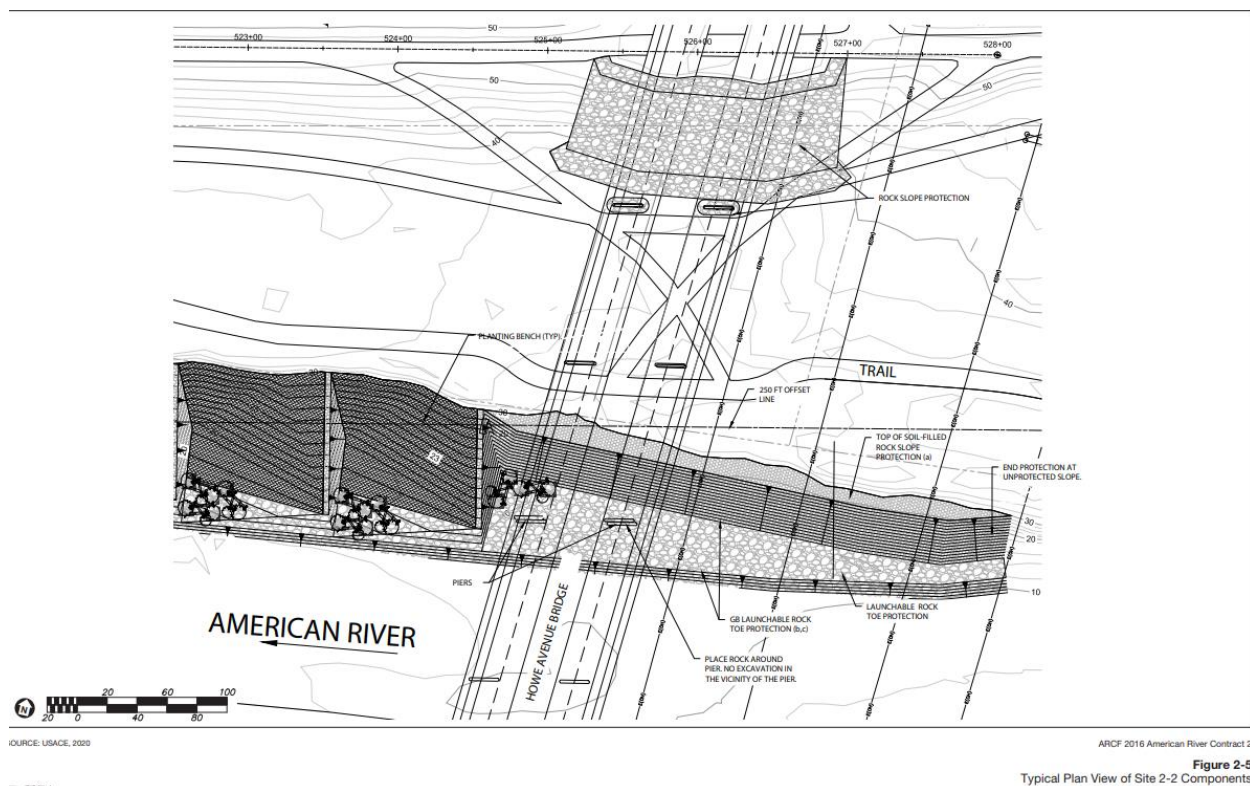


Figure 26

By contrast, the visual projections of USACE's proposed work for the 2023 Draft SEIS/SEIR are vague and overly generalized.¹¹⁹ Instead of site-by-site diagrams for Contract 3B South, USACE provides a zoomed-out map with lines indicating where launchable rock toes, trenches, and bank protection will be implemented. It is impossible from this visual (figure 27

¹¹⁷ 2023 ARCF Draft SEIS/SEIR, 3-13.

¹¹⁸ American River Contract 2 Draft SEIS/SEIR - June 2021, Figure 2-5.

¹¹⁹ 2023 ARCF Draft SEIS/SEIR, 3-36.

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cont'd

below) to ascertain any meaningful environmental or recreational impacts. Instead of site-by-site descriptions of soil filled revetments, USACE simply provides figures which illustrate the general concept of launchable rock toes, trenches, and planting benches (see figure 16).¹²⁰ The pictures of American River Contract 1 and 2 already demonstrate that we can expect little resemblance between USACE's conceptual diagrams and the final work.

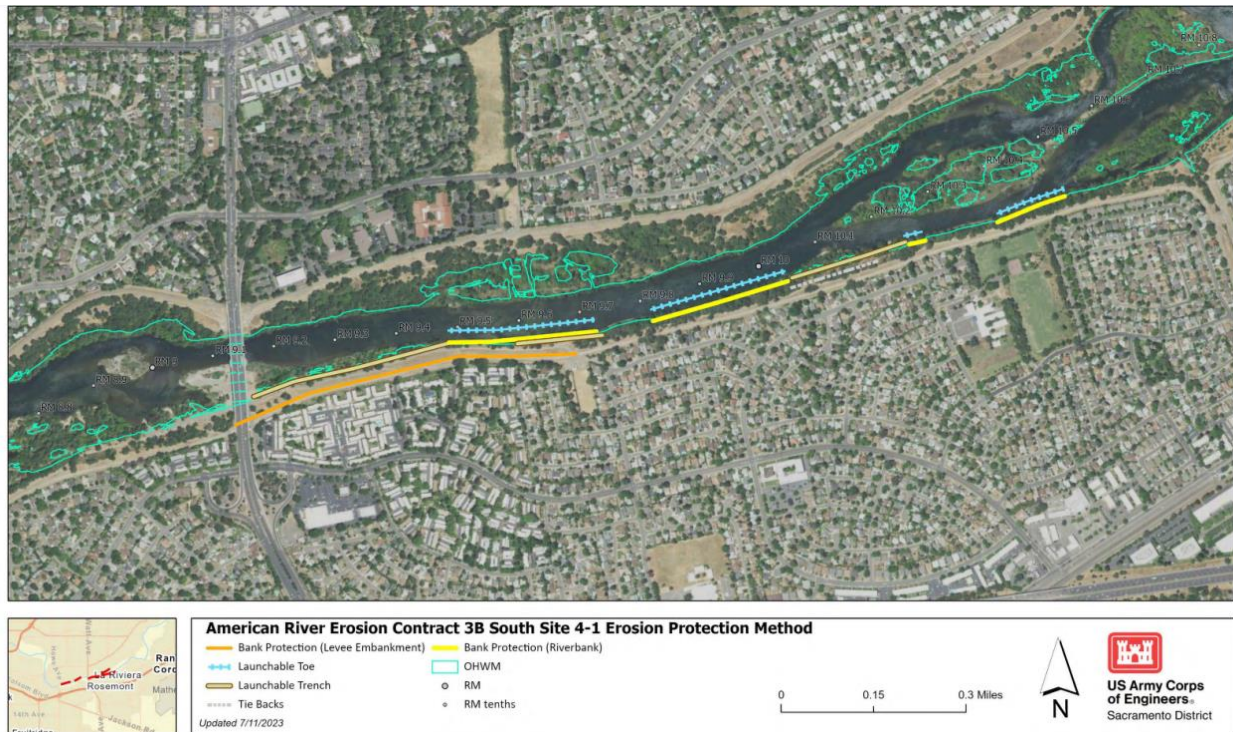


Figure 3.5.2-9. American River Erosion Contract 3B South Site 4-1 Details

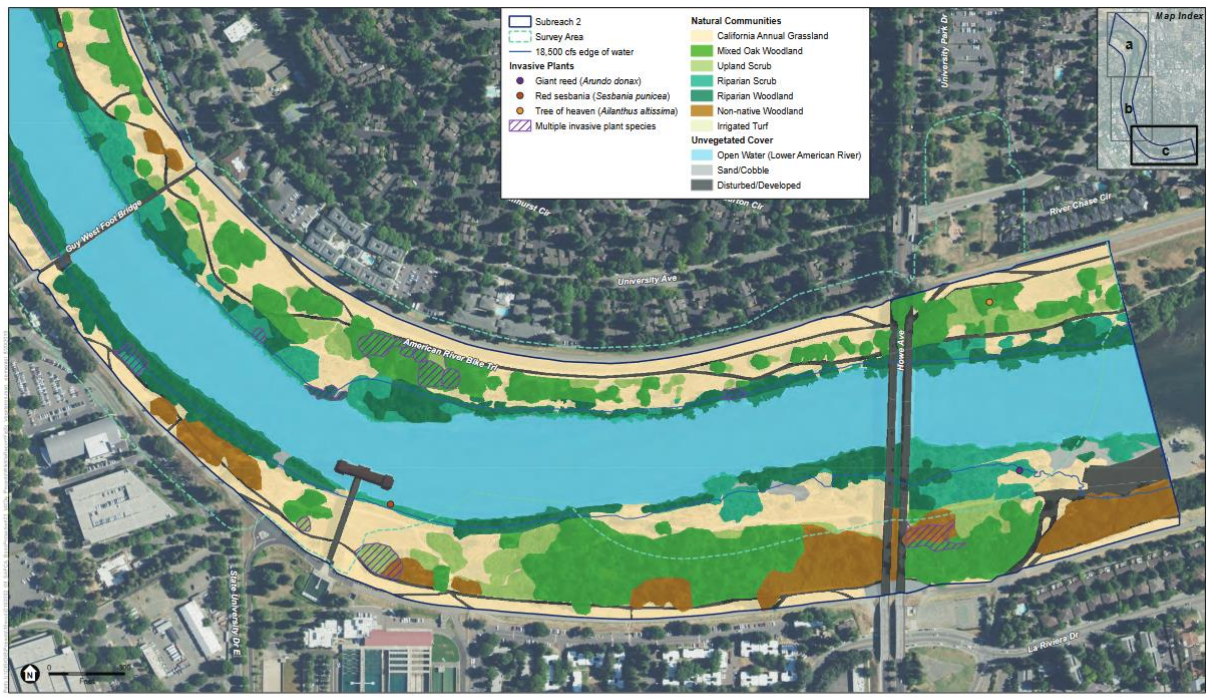
Figure 27

24

The practice of providing low detail, zoomed out maps of the entire project area also notably contrasts with the habitat maps found in American River Contract 2, which included not only section by section habitat maps, but identified 13 types of habitats, compared to only 4 for the 2023 SEIS/SEIR. Furthermore, the habitat maps for the American River Contract 2 SEIS/SEIR Appendices identified various types of woodland, including oak woodland, which the map for the 2023 SEIS/SEIR does not do.¹²¹ At the very least, USACE can mark out the areas of the Contract 3B segments which have oak trees.

¹²⁰ Ibid, 3-28 and 3-40.

¹²¹ American River Contract 2 Draft SEIS/SEIR, Appendix B. Wildlife Habitat Survey Reports for Subreaches 1, 2, 3, and 4, Including Arden Pond and for Rossmoor East and West, Figure 3A, Figure 3B, Figure 3c.



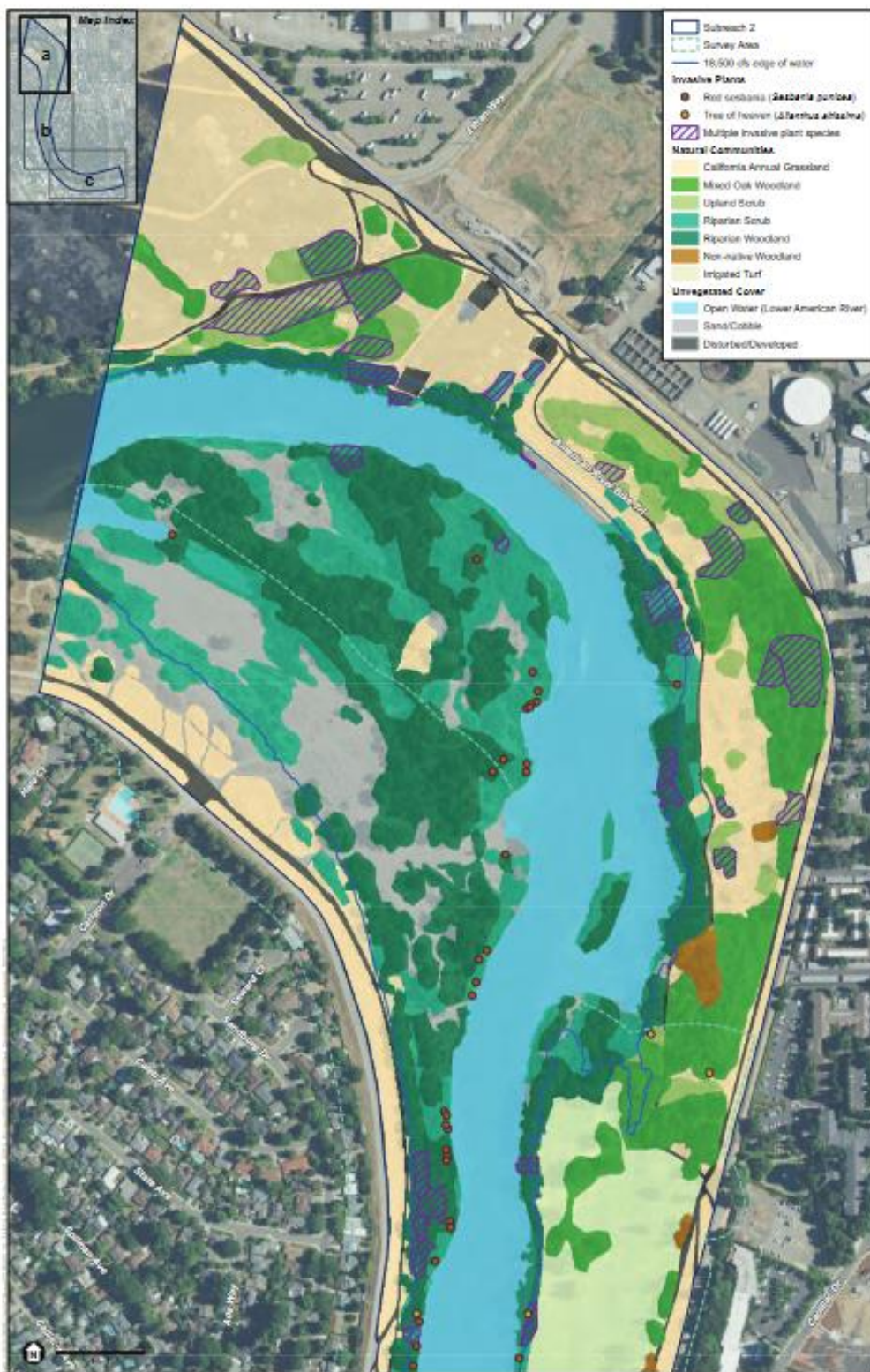
SOURCE: NHC, 2018; ESA, 2019

American River Common Features 2016 Project American River Contract 1

ESA

Figure 3c
Natural Communities of the
Lower American River Subreach 2

Figure 28



SOURCE: NRC, 2019; GSA, 2019

American River Common Features 2015 Project American River Contract 1

Figure 3a
Natural Communities of the
Lower American River Subreach 2



Figure 29

25

The lack of specificity means the public cannot reasonably trust USACE’s claim that the loss of forest land is less than significant long-term with mitigation. To state that Contract 3B South’s impacts are less than significant long-term because mitigation will allow vegetation to “grow back and provide a natural visual character again,” ignores the special character of the resources in this area.¹²² **If heritage trees are part of the vegetation lost, then the visual character of the area cannot be the same for centuries.** Such is the case with USACE’s 2011 revetments at left bank river mile 10.3-10.4. Where once there was majestic trees and majestic views of the river, there is now coyote brush which blocks views of the river.



Figure 30: Coyote brush that grew instead of trees at left bank river mile 10.3-10.4. Before there was large trees and clear views of the river.

¹²² December 2023 ARCF Draft SEIS/SEIR, 3.1-23.



Figure 31: View of heritage trees and the river at left bank river mile 10.4-10.5, where USACE is proposing riprap under Contract 3B South.

26 Furthermore, USACE's claim that project features which will remain even after construction completion, i.e. "the O&M ramps, tie backs, and vegetation free zone areas," will constitute an insignificant long-term impact on visual and aesthetic resources because they "are only a small portion of the project site for American River Erosion Contract 3B North and South" is inadequate, incomplete, and unjustified. It is like saying removing 2% of a person's body weight will be insignificant only to find out that the 2% comes from extracting the brain. Likewise, the "portion" of a project site is an inadequate measure of its impact on the visual and recreational resources of the Parkway. If a ramp, for example, goes through a 300-year-old oak tree, that is a "substantial degradation to the existing visual character or quality of public views of the site." USACE does not actually show in the Draft SEIS/SEIR where the O&M ramps and tiebacks will be. USACE should show where the access ramps will be and how they will avoid impacts to heritage oaks. USACE should provide their map of all the heritage trees in the Contract 3B area and mark out the specific trees they intend to save. Otherwise, it is impossible to determine whether the long-term impacts to the existing visual character and quality of this project area will be significant and long-term.

27 USACE also needs to acknowledge the potential impacts even to heritage trees they plan to "save." It is not enough to simply state whether they will cut down trees. In placing heavy ramps, moving construction equipment back and forth across the banks, and removing most vegetation, USACE's contractors would likely still operate within what the California Oak Foundation calls the "root protection zone" of trees excluded from removal.¹²³ The root protection zone is critical area of an oak tree's roots that is typically 1.5 times the area from the trunk to the dripline.¹²⁴

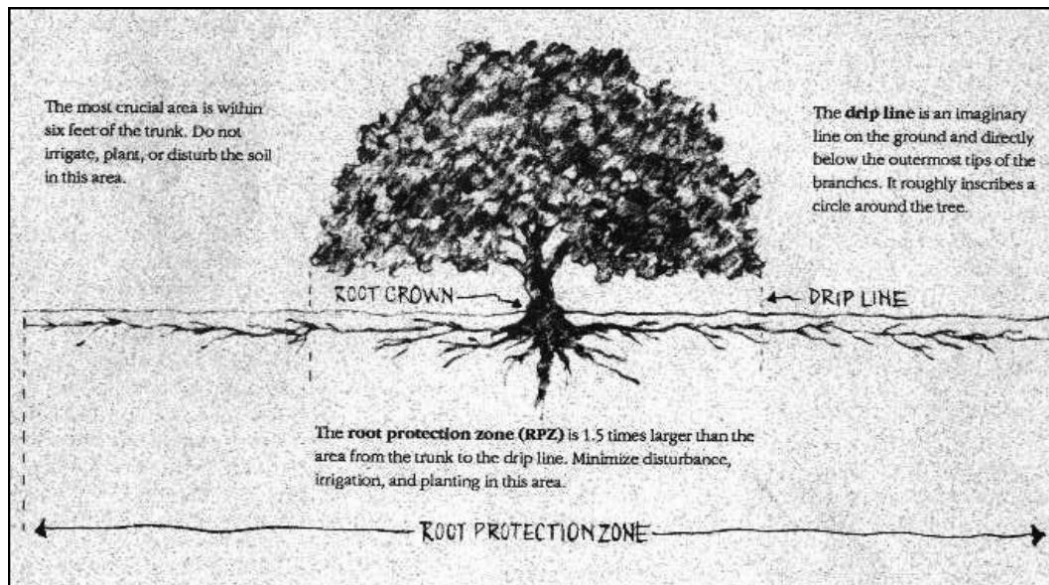


Figure 32: Diagram from "Care of California's Native Oaks"

¹²³ California Oaks Foundation, "Care of California's Native Oaks" in *Bulletin of the California Oak Foundation* (Oakland, 2016), 1. <https://californiaoaks.org/wp-content/uploads/2016/05/CareOfCAsNativeOaks.pdf>.

¹²⁴ Ibid.

Removing vegetation, trenching, or compacting the soils (through, for example, the movement of diesel trucks near trees) can kill or greatly reduce the remaining life expectancy of an oak tree even if the visible parts of the tree remain unscathed immediately after project completion. Indeed, some of the heritage oak trees near USACE's 2011 revetments at left bank river mile 10.3-10.4 died or lost most of their branches shortly after USACE finished installing the riprap. USACE should explain how they will install erosion measures without encroaching on the root protection zone of beloved heritage trees.



Figure 33: Heritage Oak Tree near the 2011 revetment project area that dropped all its branches shortly after the installation of the riprap.



Figure 34: A irreplaceable Heritage Oak Tree in the Contract 3B South area

28 The loss of heritage oak trees would be unmitigable, but to mitigate the other significant impacts of habitat removal, USACE proposes, where feasible, to cover launchable riprap with several feet of topsoil, then plant native trees such as cottonwoods, valley oaks, box elders, and alders.¹²⁵ However, the flawed design of the planting benches along with the limited period of performance monitoring shows they are not an adequate mitigation measure for the potential long-term, significant impacts caused by Contract 3B's proposed erosion protection features.

When riprap launches, it is expected to take down the planting benches. According to the *Geotechnical Report*, the waterside berm next to a launchable trench is expected to erode, and "will eventually reach the launchable trench."¹²⁶ When this happens, the "soils surrounding the trench will allow for the riprap contained in the trench to 'launch' into the void created adjacent to the trench."¹²⁷ If the trench launches as anticipated, they will likely take down the planting benches with them. Concern about collapsing planting benches was raised by the National Marine Fisheries Service 2021 Biological Opinion for ARCF. They wrote that launchable riprap is "also designed to launch to protect the levee from scour."¹²⁸ "The launching of this type of riprap," NMFS writes, "is likely to result in the loss of some of the mitigation planting bench" and to NMFS "the lack of durability of this mitigation is concerning."¹²⁹ Given that it could not "be accurately determined at what future time this planting bench will be damaged from launchable rock, the overall benefit of the mitigation becomes less certain."¹³⁰

USACE acknowledges this concern but has failed to consider mitigation measures for the entire life of the project, which is 50 years according to the 2023 SEIS/SEIR.¹³¹ In coordination with USFWS and NMFS, USACE promises to develop a vegetation management plan to "Ensure that native riparian plantings installed within the planting benches are protected, managed, monitored, and maintained," but only for "8 years, not to exceed 10 years following installation."¹³² Since erosion is cumulative, the likelihood that riprap launches would only increase each subsequent year after the monitoring period ends, and thus would also increase the likelihood of damage to mitigation planting benches. **This increasing likelihood means that without a plan to monitor and protect the planting benches over the entire 50-year life of the project, USACE cannot reasonably claim that planting bench mitigation will make the long-term impact of this project in the area of Contract 3B "less than significant under CEQA."**¹³³

29 USACE has also inadequately addressed how erosion of the planting benches will nullify their effectiveness as long-term mitigation. As USACE observed in the 2016 FEIS/FEIR, "Both the Sacramento River and the American River are confined by levees and have very little sediment in the water. Additionally, on the American River, Folsom Dam blocks sedimentation from upstream sources. Therefore, the energy of the flow tends to erode riverbanks and

¹²⁵ Ibid, 4.1-46.

¹²⁶ *American River Common Features General Reevaluation Report*, Attachment C - Geotechnical Report, 17.

¹²⁷ Ibid.

¹²⁸ Current NMFS Biological Opinion - 12 May 2021: 80.

¹²⁹ Ibid.

¹³⁰ Ibid.

¹³¹ December 2023 ARCF Draft SEIS/SEIR, 5-24.

¹³² Ibid, 3-66.

¹³³ Ibid, 3.4-12

levees.”¹³⁴ Contract 3B is not widening levees, nor is it increasing the amount of sediment flowing from Folsom Dam. Thus, we can expect that the same erosion processes which necessitated ARCF to operate even after the installation of launchable rock toes and trenches as well as planting benches. According to geologist Jeffrey Mount, “Thick, well-developed soils that have well-established vegetative covers tend to be more resistant to erosion.”¹³⁵ If the mature trees and thick vegetation which currently armor the banks of the American River in the Contract 3B area are supposedly insufficient to prevent erosion, then we can expect planting benches made up of newly laid soil held in place by immature trees (for many years) to erode away. This is not a hypothetical. USACE’s planting benches have already suffered major erosion from the 2023 high water event that was less than 40,000 cfs (see figure 14) and from the rains of February 2024 (Figures 35 and 36).



Figure 35: Eroding planting bench. You can see the irrigation lines in the upper third of the picture.

¹³⁴ ARCF Final EIS/EIR - Jan. 2016 (Updated May 2016), 9.

¹³⁵ Jeffrey F. Mount, *California Rivers and Streams: The Conflict Between Fluvial Process and Land Use* (Berkeley: University of California Press, 1995), 105.



Figure 36

USACE's answer to the problem of planting bench erosion are tiebacks, but at best USACE can only assert that tiebacks "limit the extent of erosion," not prevent it altogether.¹³⁶ Natural banks have deep, layered soils amassed over millennia from fluvial overflow deposits. This fluvial overflow deposit has created natural levees along the rivers of the Sacramento Valley that are up to twenty feet high.¹³⁷ Even if topsoil erodes away, there is still room in the bed materials of natural levees for roots to expand into. In contrast, launchable riprap creates an absolute floor only a few feet below the surface.¹³⁸ As the planting bench erodes away, the space for roots to grow gets shallower and shallower, until there is nowhere for the roots to go at all. Thus, an adequate mitigation measure based on planting benches would need to provide a mechanism for the continual replenishment of the planting bench over the entire 50-year life of the project. USACE provides no details in the 2023 SEIS/SEIR as to how deep the planting benches will be, how fast they may erode under different flow conditions, and how they may be replenished. Without these details, the public cannot evaluate the sufficiency of planting

¹³⁶ December 2023 ARCF Draft SEIS/SEIR, 3-38.

¹³⁷ Elna Bakker, *An Island Called California: An Ecological Introduction to Its Natural Communities, Second Edition, Revised and Expanded* (Berkeley: University of California Press, 1984), 144.

¹³⁸ American River Contract 2 Final SEIS/SEIR - September 2021, Figure 2-15, Figure 2-16, Figure 2-17.

benches as mitigation. Furthermore, the February 2024 rains, which did not create an extraordinary high-water event, caused erosion around the tiebacks, on the tiebacks, and under the tiebacks in the American River Contract 2 area.



Figure 37: Eroding planting bench and tieback with the riprap already exposed.



Figure 38: Eroding Tieback and Planting Bench

31 In response to concerns about the possibility of launching riprap damaging planting benches, USACE also resorts to an assumption of inevitable habitat degradation, but such an assumption is irrelevant considering CEQA and NEPA requirements. In the public scoping comments for the 2023 Draft SEIS/SEIR, comment 8-3 raised concern about the incompatibility of launchable riprap with planting bench mitigation. USACE's response was that "in the case of catastrophic flood USACE expects the bank protection features to perform as flood control features, and without these features, habitat loss would most likely be greater than without these erosion protection features in place."¹³⁹ There are several problems with this response. First, where USACE has installed launchable rock toes and trenches, they have left virtually no habitat, as shown in the pictures of erosion protection features installed for American River Contract's 1 and 2 (see figures 17, 18, and 19). In best case scenarios, USACE leaves a few trees, but a few trees no more make a habitat than a few houses make a town. Even where USACE has spared a few trees, there is no other vegetation left—no other trees or bushes, shrubs, grasses, vines, etc. USACE cannot reasonably claim that habitat loss would be greater without erosion protection measures when they remove all the habitat to install the erosion protection measures.



Figure 39: One of the segments where USACE did not remove all the trees.

Second, the likelihood of habitat loss due to catastrophic flooding is not inevitable. **There are many trees in these forests which have survived multiple 160,000 cfs flood events. We should not trade the possibility of future habitat damage for the certainty of present habitat annihilation.**

¹³⁹ December 2023 ARCF Draft SEIS/SEIR, Appendices, Appendix A. Nepa Scoping Materials, comment number 8-3.

32 Third, mitigation for CEQA and NEPA is measured against baseline conditions, not against projected future conditions. In other words, both CEQA and NEPA require mitigation measures that attempt to restore conditions as they existed before project implementation. As outlined in CEQA, “the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published.”¹⁴⁰ A lead agency may use projected future conditions as a baseline “only if it demonstrates with substantial evidence that use of existing conditions would either be misleading or without informative value to decision-makers and the public.”¹⁴¹ A brief response to a public comment does not constitute “substantial evidence.” Furthermore, an existing conditions baseline “shall not include hypothetical conditions.”¹⁴² Under NEPA, environmental data collection and analysis is completed prior to project implementation to provide an understanding of the baseline conditions for each potentially affected resource for reference when determining the predicted efficacy of mitigation commitments is being achieved.¹⁴³ In short, mitigation for both NEPA and CEQA are primarily based on existing conditions before project implementation, not on hypothetical future conditions, and USACE has not provided substantial evidence as to why future conditions should be used as a baseline.

33 NEPA also demands a “Commitment to seek funding” for the entire life of a project, and “if it is reasonably foreseeable that funding for implementation of mitigation may be unavailable at any time during the life of the project, the agency should disclose in the EA or EIS the possible lack of funding and assess the resultant environmental effects.”¹⁴⁴ CEQ demands that “if the agency committing to implementing mitigation has not disclosed and assessed the lack of funding, and the necessary funding later becomes unavailable, **then the agency should not move forward** with the proposed action until funding becomes available or the lack of funding is appropriately assessed.”¹⁴⁵ USACE has not identified mitigation funding for the 50-year life of ARCF, nor has it assessed the potential environmental impacts that would culminate from this lack of funding. According to the Army’s regulations, “unless money is actually budgeted and manpower assigned, the mitigation does not exist.”¹⁴⁶ Without identifying mitigation funding for the 50-year life of ARCF, USACE cannot reasonably claim they are mitigating environmental impacts nor that these impacts are long term less than significant with mitigation. Therefore, USACE should not move forward with Contract 3B.

34 Identifying the potential long-term costs of maintaining planting benches on top of launchable riprap is critical because USACE has a history of devising brute-force solutions which end up burdening local governments with costly long-term commitments. For example, after storms inundated Santa Cruz during the 1950s, USACE went to war against the San Lorenzo River. USACE stripped the river of vegetation, straightened it, and lined its channel with

¹⁴⁰ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15125(a)(1).

¹⁴¹ Ibid, 15125(a)(2).

¹⁴² Ibid, 15125(a)(3).

¹⁴³ Executive Office of the President, Council on Environmental Quality, Memorandum for heads of Federal Departments and Agencies, January 14, 2011, p. 12.

¹⁴⁴ Ibid.

¹⁴⁵ Ibid, 9.

¹⁴⁶ Ibid, 17.

concrete and riprap. USACE promised that these measures would protect downtown Santa Cruz from a 100-year flood. Instead, the river laughed at USACE's hubris and moved restore its profile by filling its channel with 12 million cubic feet of sediment within 10 years of the project's completion. Santa Cruz subsequently had to spend millions of dollars annually to dredge a channel which can now only handle 25–30-year floods.¹⁴⁷ USACE should identify the possibility that planting benches on top of launchable riprap will become a long-term commitment for local agencies. CEQ requires that the lead agency identify "all relevant, reasonable mitigation measures" even "if they are outside the jurisdiction of the lead agency" to "serve to alert agencies or officials who can implement these extra measures."¹⁴⁸

Fourth, both the California and National Wild and Scenic River Acts make it a policy that protected rivers and "their immediate environments shall be protected for the benefit and enjoyment of present and future generations."¹⁴⁹ The NWSRA declares that "each component of the wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system."¹⁵⁰ In essence, both WSRAs demand continuous preservation. It is the policy of the state and federal government to preserve and protect rivers in the condition they were in when they were inducted into the Wild and Scenic River Systems for both **present** and future generations. If USACE is going to decimate habitat along a Wild and Scenic River, it is USACE's responsibility to restore and sustain that habitat to what it was before they installed riprap.

Even with planting bench mitigation, USACE's policies still conflict with the State and National Wild and Scenic Rivers Acts. In Appendix E of the *Final Environmental Impact Statement for the Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System*, the US Interior Department and the Heritage Conservation and Recreation Service explain 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."¹⁵¹ In other words, the scenic, aesthetic, and natural appearance of the river and its banks cannot be separated from what makes the river "recreational." Later in the chapter, the Interior Department and the Heritage Conservation and Recreation Service identify the resource values which made the Lower American River a suitable candidate for inclusion in the Wild and Scenic River system. Among these resource values was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees."¹⁵² The Heritage Conservation Service reiterated the connection between lush riparian forest and the Lower American River's recreation value in the *Evaluation Report on the Eligibility of Five California Rivers for Inclusion in the National Wild*

¹⁴⁷ Jeffrey Mount, *California Rivers and Streams*, 302-304

¹⁴⁸ Council on Environmental Quality, *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations*, (March 23, 1981, Amended 1986).

¹⁴⁹ Wild and Scenic Rivers Act, Sec. 1(b). California Wild and Scenic Rivers Act, 5093.50.

¹⁵⁰ Wild and Scenic Rivers Act, Sec. 10(a).

¹⁵¹ US Interior Department and Heritage Conservation and Recreation Service, "Appendix E" in *Final Environmental Impact Statement for the Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System* (1981), p. 9.

¹⁵² Ibid, 26.

and Scenic Rivers System.¹⁵³ The LAR's forests, the Heritage Conservation Service reported, constitute a critical part of "one of the most unique stretches of public parkland in the country" that provides "many recreation opportunities," including "hiking" and "canoeing."¹⁵⁴ They add that the American River and its adjoining riparian lands possess "notable wildlife and botanic values considering its proximity to an urban setting."¹⁵⁵ Because of the proximity of lush riparian habitat to urban Sacramento, "students of all ages and members of the Audubon Society and the Sierra Club spend a considerable amount of time along the river observing wildlife."¹⁵⁶ Critically, the Lower American River's "riparian hardwood strip" provides so much recreational value because "the riparian vegetation is **carefully protected**," allowing for the uniform dispersal along the river of "birdlife, including raptors and wading birds."¹⁵⁷ We cannot say that the riparian vegetation has been "carefully protected" after allowing an agency to remove it altogether. Thus, any significant impacts from intentional actions, even short-term, to the riparian forests of the Lower American River would degrade the **INTRINSIC** conditions which makes the LAR a state and national wild and scenic river. Furthermore, USACE has not addressed what it means that their erosion measures are designed for 50 years. Does it mean that in half a century they will have to return and repair or replace the riprap? How can these forests, heavily populated with trees that are 75, 100, 150, and 200 years old, ever return to a "carefully protected" status if USACE must install tree-removing erosion measures every 50 years?

Because the riparian forests of the American River Parkway constitute an essential feature of its outstanding recreational values, cutting down the forests for any reason may impair the LAR's outstanding remarkable value of recreation. Certainly, if the riparian forests can never return to their former maturity because of the inevitability of the riprap launching, or because erosion diminishes the planting bench over time, or because in 50 years USACE may have to clear-cut the forests again to reinstall riprap, then USACE's chosen mitigation measure of planting benches fails. But even with mitigation, mass habitat decimation and measures that by design cannot be long-term mitigated are irreconcilable with Wild and Scenic Rivers.

Regardless, USACE should address the erodibility of planting benches, the long-term prospect of launched riprap damaging the benches, and how they aim to restore riparian forest to a carefully protected status, which would require sustaining mitigation plantings beyond the 50-year design of this project.

It is also uncertain whether USACE can reconcile its measures with the second outstanding remarkable value of the Lower American River, anadromous fishery. As stated in the vegetation management strategy of the 2017 *Central Valley Flood Protection Plan Conservation Strategy*, the removal of woody vegetation found on and near Central Valley levees "can result in ecological impacts that are considered essentially 'unmitigable' due to the

¹⁵³ Heritage Conservation and Recreation Service, *Evaluation Report on the Eligibility of Five California Rivers for Inclusion in the National Wild and Scenic Rivers System*, (1981), II-32

¹⁵⁴ Ibid.

¹⁵⁵ Ibid.

¹⁵⁶ Ibid.

¹⁵⁷ Ibid.

unique nature of this landscape feature.”¹⁵⁸ The NMFS Recovery Plan points to the construction of “armored banks” as a major contributor to the decline of endangered salmonids which rely on wetlands and riparian habitats.¹⁵⁹ Approximately 95% of the historical wetlands and riparian habitats no longer exist in the Sacramento and San Joaquin Valley, and the remaining riparian habitat is highly fragmented.¹⁶⁰ Consequently, more than 16 species associated with the habitats of the Sacramento and San Joaquin Valley are now listed under the California Endangered Species Act or ESA. 22 other animal species dependent on floodplain habitat are considered sensitive species.¹⁶¹ Riprap has especially harmed salmonids by eliminating much of the high value SRA cover along the banks of the Sacramento and San Joaquin River Systems.¹⁶² Spawning salmon need clean gravel with small to moderate pebbles to build their redds.¹⁶³ By replacing small rocks and pebbles with riprap, USACE will impair salmonid habitat. Planting benches do not adequately mitigate the destruction wrought on salmonid habitat by launchable riprap. The 2017 CVFPP Conservation Strategy found that “for anadromous fish, the habitat value of woody vegetation planted in revetment, relative to SRA cover, is uncertain.”¹⁶⁴ As of the 2022 update to the CVFPP Conservation Strategy, data is still insufficient to justify “the habitat value of woody vegetation planted in revetment, relative to SRA cover.”¹⁶⁵

Both CEQA and NEPA require that lead agencies consider the cumulative impacts of their projects, which USACE has not sufficiently done. CEQ’s NEPA regulations define cumulative impacts as the “impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.”¹⁶⁶ CEQA asks agencies to look at whether or not projects are “cumulatively considerable,” which means that “individual effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”¹⁶⁷ Furthermore, CEQA was in part passed as recognition that “the capacity of the environment is limited.”¹⁶⁸ **USACE has not considered how removing 685 trees from the riparian corridor between Larchmont Community Park and Howe Avenue, and in many places installing large stones at river’s edge, so soon after decimating the riparian habitats at river park, and before mitigation plantings can mature, will compound environmental impacts on SRA habitat that vulnerable salmonid populations need to survive. If USACE carries through with Contract 3B, for at least several years there will**

¹⁵⁸ *Central Valley Flood Protection Plan Conservation Strategy* (November 2016), Appendix D. Vegetation Management Strategy, D-3.

¹⁵⁹ Annalisa Louise Batanides Tuel. 2018. “Levee Vegetation Management in California: An Overview of Law, Policy, and Science, and Recommendations for Addressing Vegetation Management Challenges,” *Environs*: 381.

¹⁶⁰ *Ibid*, 394.

¹⁶¹ *Ibid*, 395.

¹⁶² *Ibid*, 397-398.

¹⁶³ *Ibid*, 397.

¹⁶⁴ *Central Valley Flood Protection Plan Conservation Strategy* (November 2016), 8-8.

¹⁶⁵ *Central Valley Flood Protection Plan: 2022 Conservation Strategy Update*, 3-65.

¹⁶⁶ June 24, 2005 Memorandum, Council on Environmental Quality, Re: Guidance on the Consideration of Past Actions in Cumulative Effects Analysis, p. 2.

¹⁶⁷ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15065.

¹⁶⁸ CEQA, 21000(d).

not be a single fully intact mile of riparian corridor on the Lower American River from Larchmont Community Park to Paradise Beach, a stretch covering 6 miles, more than a quarter of the 23 mile Wild and Scenic Lower American River. Given how fragmented and narrow SRA habitat is already, USACE's Contract 3B does not bode well for salmonids.

USACE mentions that on the Sacramento River,

"Vegetation removal as part of these projects, in combination with the vegetation removal that is planned for other erosion contracts from the ARCF 2016 Project, could contribute to long-term cumulatively considerable incremental contribution to temperature increases and nonattainment of beneficial uses along the Sacramento River."¹⁶⁹

For the American River, however, USACE just notes that the "Proposed Action's contributions would be significant and unavoidable," but fails to consider how adding this project so soon after the work for American River Contracts 1, 2, and 3A could compound adverse effects.¹⁷⁰ For vegetation and wildlife, USACE minces words by stating that "project implementation has the **potential to contribute** to the loss or degradation of sensitive habitats, riparian habitats, waters of the United States, waters of the State, and forestland."¹⁷¹ USACE concedes that the effects of its current proposals may have similar adverse effects as past proposals, but again, fails to even mention how completing so many projects so close in time could compound adverse effects on vegetation and wildlife.¹⁷² USACE then claims:

"Once mitigation and compensation plantings have matured to the level of those removed, 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."¹⁷³

As already noted, USACE has not addressed the increasing likelihood of riprap launching over the 50-year life of the project, which in turn would damage the planting benches and prevent new plantings from reaching maturity. USACE has also not addressed the erodibility of planting benches, which will make them less hospitable for plant growth over time. Furthermore, as already noted, part of the LAR's outstanding remarkable value of recreation is its lush, "carefully protected," riparian forests. A lush, carefully protected forest is multigenerational, with vegetation ranging anywhere from 3 days to 300 years old. Even if USACE's new plantings survive the eroding planting benches and the launching of the trenches and toes, they will not reach the same level of multigenerational diversity of the habitats they have replaced for centuries. Thus, USACE cannot say that within the 50-year life of the project, the habitat will resemble the removed habitat. USACE once again fails to place "**special emphasis**" on "**environmental resources that are rare or unique to that region.**" The

¹⁶⁹ December 2023 ARCF Draft SEIS/SEIR, 5-22.

¹⁷⁰ Ibid.

¹⁷¹ Ibid, 5-24.

¹⁷² Ibid.

¹⁷³ Ibid, 5-25.

riparian forests of the LAR are not just any habitat. They were special enough to factor in the LAR's Wild and Scenic induction. CEQA requires agencies place special consideration for environments within a quarter mile of a Wild and Scenic River.¹⁷⁴ USACE should acknowledge what makes the LAR unique and take care in their analysis of how their policies will affect its special resources.

Based on years of experience, apprehensive local fishermen are not convinced that USACE has fully considered the ecological implications of its actions, nor that its selected mitigation methods will work. The following is the perspective of a Sacramento area fisherman, who wishes to remain anonymous.

"Coming from a family of fishermen and being a fisherman myself, I find it hard to believe that anyone who had done their research before destroying many miles of the river bank, would not have concluded the massive damage they would be creating for the fish and their natural habitat. From my many years of fishing, we always stayed close to and fished the banks of the water. Whether a river, lake or stream, the fish naturally hide, feed from and have their habitat along the water's edge. If you want to find fish, you almost always stay along the edge of the water where you find rocks, fallen trees, branches, grasses and overhangs where they protect themselves. This goes for many types of fish, of which I am used to fishing for.

After going out to see the American River and following the edge of the water, all I could think of is what about the fish? Their entire natural habitat is completely destroyed from this project. I also have seen the absolutely useless areas, where this project had chained old trees along the river, thinking it would be the new fish habitat. We are in the middle of winter, which is our rainy season and the majority of these trees are not even in the water. The only time they would be, is in a flood season where the river would come up high enough to do anything at all for the fish and even then would only be a tenth of what was destroyed. Being here, in California, it seems like we are in drought more years than not, so the conclusion is what a futile waste and where will the fish go? Someone did not think this through very well or at least did not do their research well, or maybe at all!"

The drone photo below, taken in January of 2024, illustrates how much more habitat, shade, and hiding places undisturbed riparian habitat provides compared to the bundles of dead woody material USACE uses for mitigation.

¹⁷⁴ CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15206(b)(4)(D)



Figure 40

Not only will destroying mature forest threaten salmonid populations, but the laying down of launchable riprap on numerous beaches in the Contract 3B area could make several beloved beaches in the Contract 3B area forever inaccessible. Once again, this was a concern raised in 2016. Apprehensive citizens wrote:

38 “The final EIS/EIR does not adequately characterize the many varied uses of the river and Parkway. Thus, it cannot and does not catalog and assess the harms to such uses that will be the result of the proposed project. For instance, the impacts to recreation seem focused on use of the parkways paved bikeway. While a key asset, there are other equally worthy of close consideration, such as **swimming, shoreline recreation, fishing**, walking, and bird watching.”¹⁷⁵

Another comment, from M.B. Schwehr, recalls how after five years where USACE installed riprap at left bank river mile 10.3 in 2011,

“The shady, serene river trails and **river shoreline** no longer exist, and will not for decades due to removal of nearly all the majestic trees in that stretch, despite assurances that ‘most’ would be spared. The **shoreline is un-useable for any recreation** due to the large quarried rocks.”¹⁷⁶ “

We can better understand M.B Schwehr’s dismay by comparing the riprapped shoreline of left bank river mile 10.3 to the as yet non-riprapped shoreline of the adjacent shoreline.

¹⁷⁵ Letter from Matthew Carr, Graham Brownstein, et al, in ARCF Final EIS-EIR - Jan. 2016 (Updated May 2016), Appendix F-Public Involvement.

¹⁷⁶ Letter from M.B. Schwehr, in ARCF Final EIS-EIR - Jan. 2016 (Updated May 2016), Appendix F-Public Involvement.



Figure 41: Riprap at left bank river mile 10.3-10.4



Figure 42: Adjacent, non-riprapped shoreline at left bank river mile 10.4

The non-riprapped shoreline is usable for walking, swimming, launching a canoe, or fishing. The riprapped shoreline is covered with large rocks and is unusable for the public.

To apprehensions about loss of access to shoreline recreation, fishing, and swimming, USACE assured that “once construction is complete and mitigation plantings have been

established, access to the water's edge in the construction footprint will be permitted.”¹⁷⁷ This assurance does not address concerns that riprap would eliminate beaches altogether. In addition to the riprap bank protection proposed in the 2016 *General Reevaluation Report*, USACE has added launchable rock toes. USACE needs to address how bank protection and launchable rock toes will affect access to beaches. USACE understands that beaches are an aesthetic and visual resource. Section 4.4 of the 2023 Draft SEIS/SEIR lists “sandy beaches” as part of the aesthetics and visual resources of the SRMS.¹⁷⁸ Elsewhere in the SEIS/SEIR, USACE mentions that “shorelines provide hunting grounds for wading birds such as herons and egrets, and for kingfisher waterfowl, and shorebirds.”¹⁷⁹ Yet not once in the 2023 Draft SEIS/SEIR does USACE address potential loss of shoreline due to the installation of launchable rock toes. At left bank river mile 10.5, USACE’s proposed launchable rock toe may make two beloved beaches forever inaccessible.

Here is a beach at left bank river mile 10.5 as it was photographed for Google Earth

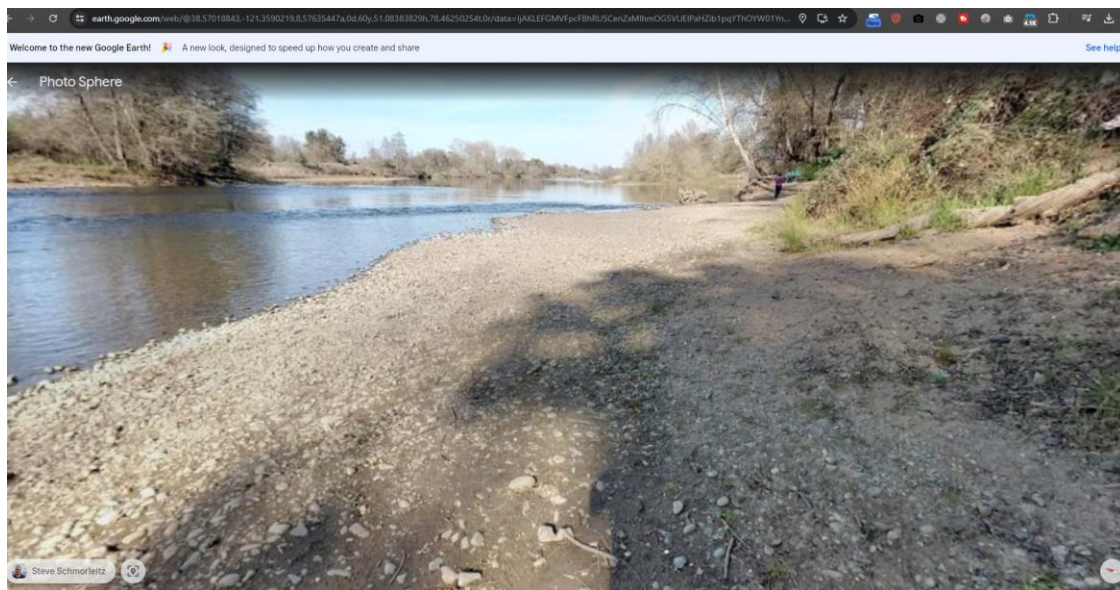


Figure 43: <https://earth.google.com/web/@38.57018843,-121.3590219,8.57635447a,0d,60y,0h,85t,0r/data=!jAKLEFGMVFcFBhRU5CenZxMlhOG5VUEIPaHZib1pqYThOYW01YnRLVF9JRDRpEAU6AwoBMA>

CEQ states that

Mitigation measures must be considered even for impacts that by themselves would not be considered “significant.” Once the proposal itself is considered as a whole to have significant effects, all of its specific effects on the environment (whether or not

¹⁷⁷ Letter to Graham Brownstein from Josephine R. Axt, May 24, 2016, in ARCF Final EIS-EIR - Jan. 2016 (Updated May 2016), Appendix F-Public Involvement. P. 2.

¹⁷⁸ December 2023 ARCF Draft SEIS/SEIR, 4-139.

¹⁷⁹ Ibid, 4.1-16.

“significant”) must be considered, and mitigation measures must be developed where it is feasible to do so.¹⁸⁰

USACE has not considered the impact of its proposal on the beaches of the Contract 3B area. NEPA requires that it not only consider those impacts, but also consider any feasible mitigation measures.

39 American River Erosion Contract 3B creates so much risk for public safety, for heritage
trees, for mature riparian forest, for salmonid populations, and for recreational resources that
the only prudent course of action for USACE is to reconsider and redesign the whole project. I
40 ask USACE to follow the recommendations of its own experts and account for erosion resistant
areas of the LAR in its geotechnical analysis. I ask that instead of relying on oversimplified 2-d
41 models which overestimate velocities along banks with mature trees, USACE use high-fidelity
hydraulic modeling that will allow them to avoid needless devastation of a protected area. If
42 high-fidelity hydraulic modeling and thorough geotechnical analysis still demonstrate a need for
erosion protection measures, I ask USACE to work with unbiased independent experts to devise
bioengineering alternatives that enhance the natural erosion protection features of the Lower
American River instead of removing them. The habits and wildlife along our Wild and Scenic
River may not survive another attempt by USACE to wage war against nature.

Sincerely,

Joshua Thomas
PhD Candidate, History Department
University of California Davis

¹⁸⁰ Council on Environmental Quality, *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations*, (March 23, 1981, Amended 1986).

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 1:21 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Project between Howe and Watt

From: Mary Swisher <maryeswisher@gmail.com>
Sent: Thursday, February 22, 2024 1:13 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Project between Howe and Watt

Re: comment on American River flood project between Howe and Watt

The Army Corps of Engineers' plans for flood control along the American River Parkway between Howe and Watt Ave would be a devastation of animals and habitat.

intro In summer the trees and river banks provide an outdoor living area. We swim, kayak, bike and walk in the access to the cool river and lush trees. It is our back yard for many Sacramento families.

The concentration of wild life would be destroyed. Where can you go to see deer with their fawn or a coyote; all within a few minutes walk or bike ride. There are otter and beaver that can be approached in a canoe or Kayak. Fishermen sit peacefully in the early morning, waiting for a fish to bite. Children swing on ropes to drop into the cool water. I've watched a hawk sweep down to snatch a baby duck. This is where we take our children to see nature.

The destruction of the trees will make a once desirable place to live and play a wasteland for both humans and animals. The coyote and deer will be pushed into to neighborhoods causing panic and death.

1 The Army Corp of Engineers solutions for flood control should be tempered by concern for people and habitat. We bought a house seventy years ago in a flood plain knowing the risk. We chose to live here because of the trees and nature. It is time to have a more balanced approach than what the Corps is offering.

Mary Swisher
Elizabeth Swisher
Tom Freeman



From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 1:20 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Save the trees along American river

-----Original Message-----

From: Paula Bowden <paulabow@mac.com>
Sent: Thursday, February 22, 2024 1:13 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Save the trees along American river

1 | Enough said.
| Figure out something else. It's already proven not to work.
| Paula Bowden

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 1:15 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Ashley Langdon <hello@mildlyscenic.com>
Sent: Thursday, February 22, 2024 1:11 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Jonah.Knapp@cvflood.ca.gov; SorgenKC@sacounty.gov; BellasE@sacounty.net
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway is extremely valuable to me.

A I am a trail runner, an author, and a mother to two small boys. During the pandemic, we spent over 60 days along the river during the first 4 months of the shutdown and the experience rooted a deep appreciation and need for the proximity of wild space. I am publishing a book: [Mildly Scenic: A Trail Guide to Sacramento's Lower American River](#), which will be released in April 2024. Since beginning this book in 2021, many of the trails in Chapter 3 (Paradise Beach) and Chapter 4 (Guy West Bridge) have been bulldozed and replaced by scorched gravel without a tree in sight, substantially diminishing the recreational draw of this stretch of river.

B Now, seeing Chapter 5 (Watt Ave to Gristmill) on the chopping block has me deeply concerned. Not only am I worried for the natural habitat and the health of our riparian habitat, I am personally concerned for the loss of riverside trails along the stretch proposed. I run the river trails along the entire parkway several times a week, my husband bikes the entire length of the parkway a few times weekly, and my kids join me along the river at least once/week. The river in it's natural and wild state is by far our favorite part of living in Sacramento.

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.

Among a long list of worries, I'm worried about the devastating impact on wildlife and the diminished recreational value, not to mention air quality and completely less-than-scenic results.

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,

Ashley Shult Langdon

--

ASHLEY SHULT LANGDON

Mildly scenic adventures • • • Wild and scenic river
mildlyscenic.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 1:10 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Jennifer Wyatt <jenniferswyatt@gmail.com>
Sent: Thursday, February 22, 2024 1:08 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 my family, our real estate value, and the birds and mammals that we see every day. And every day hundreds of people enjoy the beauty of the current levy near our home off Estates Drive. The value woods, trees, and

wildlife are priceless to the people that enjoy the beauty of our levy. It terrifies me to think our space could end up looking like the ugly H Street Bridge section near Sac State. Please do not do that to all of the homeowners and people along the 3B area!

[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.]

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. Please don't take away this jewel from our home and our families.

Thank you.

Jennifer Wyatt, homeowner

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 1:08 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Charlie stein <cstein.cs@gmail.com>
Sent: Thursday, February 22, 2024 1:03 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

I am an avid kayaker and this will interfere with my activities and reason for purchasing our home here.

I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable”

after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet deep or more slurry cutoff walls were added

to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed “significant unavoidable” when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings – could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms).

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service noted that “the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities.” Among the values noted was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.” Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected”. The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as “scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife,” all “link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers.” Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

I object to the extreme destruction of over 500 trees in Contract 3B-south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

Charlie Stein

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 1:07 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Erin Beckman <embeck143@hotmail.com>
Sent: Thursday, February 22, 2024 12:51 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

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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.

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If erosion "spot fixes" are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach. The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

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Thank you.

Erin Beckman

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 12:46 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments from Levee Safety site, getting involved

-----Original Message-----

From: Laux, Jennifer Louise CIV USARMY CEMVK (USA) <JENNIFER.L.LAUX@usace.army.mil>
Sent: Thursday, February 22, 2024 12:42 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: HQ-LEVEESAFETY <HQ-LEVEESAFETY@usace.army.mil>
Subject: FW: [Non-DoD Source] Comments from Levee Safety site, getting involved

-----Original Message-----

From: Art Stapleton <artstaple@yahoo.com>
Sent: Thursday, February 22, 2024 2:19 PM
To: HQ-LEVEESAFETY <HQ-LEVEESAFETY@usace.army.mil>
Subject: [Non-DoD Source] Comments from Levee Safety site, getting involved

1 | To whom this concerns,
I am opposed to removal of heritage Oak and major tree removal along met American river regarding contract. 3B site a response would be appreciated. Thank you Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 12:44 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] American River Levee Upgrade Project - SEIS/SEIR Comment Letter

From: Paul Miller <pjmiller1962@icloud.com>
Sent: Thursday, February 22, 2024 12:29 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Levee Upgrade Project - SEIS/SEIR Comment Letter

To Whom it may Concern:

I am is very concerned about the impacts the de-vegetation plan for the American River between Howe Avenue and Watt Avenue will have on birds and other wildlife. This riparian environment is incredibly important for both waterfowl and forest birds, in addition to the other fish and mammals that call this stretch of the river their home.

- 1 The draft SEIS/SEIR contains multiple serious flaws that must be addressed to meet the legal and procedural requirements of NEPA and CEQA. The process for involving the public and responsible agencies was inadequate to meaningfully involve them in the planning process. The SEIS/SEIR document is so poorly organized and presented that has been nearly impossible for all but the most experienced reviewers to navigate and understand.
- 2 The document also is replete with errors and inconsistencies among various sections in describing the project and its impacts. The range of alternatives considered is artificially narrow, with no meaningful alternatives presented or evaluated for bank protection methods or mitigation site locations. The environmental analyses, including impact assessment for noise, air quality, recreation, and biological resources, are inconsistent in various sections of the document and misrepresent and omit numerous environmental impacts, including some that were clearly identified in public scoping. In particular, the impacts of bank protection to existing oak woodland and riparian habitat, and associated wildlife and recreation use, and the effects of converting the Urrutia Pond to a mitigation area are either mischaracterized or ignored.
- 3 In short, the extensive deficiencies others have documented demonstrate that the document is inadequate to meet the legal requirements for public review under NEPA and CEQA.

I strongly urge you to reconsider the plan as proposed, and prioritize the conservation of this incredible urban wildland.

Sincerely,

Paul Miller

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 12:41 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Flood Protection

-----Original Message-----

From: Michael Conley <barongruda06@gmail.com>
Sent: Thursday, February 22, 2024 12:20 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Flood Protection

1 | Save as many old trees as possible and protect birds and fish While protecting Sacramento from flooding Mike Conley Sacramento Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 12:39 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comment on Proposal for the American River

From: oneworldtr@aol.com <oneworldtr@aol.com>
Sent: Thursday, February 22, 2024 12:17 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comment on Proposal for the American River

To Whom It May Concern:

intro

I was a Forestry Technician with the Army Corps of Engineers in my early days. I then went on to research reforestation of challenging areas, including those periodically inundated. Three years ago my husband and I moved to Sacramento and we quickly discovered the wonderful American River Trail, 1.5 miles south of our home in Arden-Arcade. We have explored the length of the trail mainly by bike, utilizing the multi-use path 2-3 times per week. In fact, this is under doctor's orders to exercise my knees while biking due to the wear and tear I have done to them as a research forester!

When we heard about the new proposals for riverbank modifications, we were intrigued. The part that really concerns me is exemplified by the area I see down near Sac State. It was not re-vegetated and it is baking hot on the ground, both physically and aesthetically unpleasant. The lack of shade affects all users, people and wildlife, and is hampering the natural re-vegetation of the site. I would like to see that area returned to a vegetated, shady, healthy riparian community. If the further work is going to mirror that result, then it needs to go back to the drawing board!

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Future work should limit tree removal to the absolute minimum possible. Work should be done carefully to avoid damage to the residual trees. Any areas that are stripped of vegetation, which should be at a bare minimum, should be reforested with appropriate, locally-sourced riparian species, such as the willows and poplars that one sees on site, with the oaks, elderberries, buckeyes, etc. at higher elevations.

Do not set back succession so that we end up with bare, degraded, over-heated soil instead of the cool, shady, attractive riparian habitat we all treasure. In this time of climate uncertainty, this proposal is sending us in exactly the wrong direction. Please preserve the beautiful resource we have!

Sincerely,

Laura Fanger
Retired Forester