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Valley Flood Protection Board
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Subject: Comments on the draft American River Common Feature, 2016 Flood Risk Management Project (project) Sacramento, California Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SEIR)

The Environmental Council of Sacramento (ECOS), a consortium of local and regional environmental and community-based organizations, is providing the following comments on the Draft SEIS/SEIR prepared for the subject project.

In summary, ECOS believes the Draft SEIS/SEIR document is significantly flawed, and the scoping process used in its development is inadequate. We request that both agencies reopen the scoping process to ensure full public participation and the development and analysis of viable, protective project alternatives. The document fails to clearly articulate the reasons for the project, and the need for, and the extent of, vegetation removal necessary to accomplish the project's objectives. Regarding this latter point, additional analysis and alternatives need to be considered and evaluated to ensure maximum protection of the American River Parkway is afforded while also accomplishing the project's bank and levee protection objectives.

An ineffective public participation process has been used while developing the Draft SEIS/SEIR document. The public participation process has failed to explain the need for and necessary components of the project. The comments being submitted by the County of Sacramento, other community groups, and members of the public demonstrate in part the public involvement process deficiencies. These deficiencies need to be corrected both through an expanded, in person, public participation process, and an expanded analysis and study to establish the most

effective techniques that preserve the American River Parkway and attendant vegetation and improve riverbank and levee integrity.

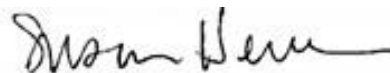
ECOS understands and supports the importance of regional flood protection. Recent actions to improve the Folsom Dam complex and the banks and levees at other portions of the lower American River are designed to afford Sacramento communities a higher degree of flood protection. ECOS fully supports these goals. We also support the protection of both the American River's banks and levees in the project areas. We understand that the river channel and flows in these areas can pose a significant risk to the existing banks and levees. This increased risk could result in flooding and potential damage to the American River Parkway and the adjacent community when maximum reservoir releases caused by extreme storm water events are required. While this project is intended to mitigate these impacts, ECOS also believes the project can be designed and constructed to minimize the impacts to the adjacent environmental resources and the American River Parkway. The Parkway is a regional jewel, a wildlife corridor, and is enjoyed by over eight million visitors every year. This project should go forward only after all efforts to ensure the Parkway's protection have been analyzed, and appropriate project improvements are incorporated into the project design and implementation.

ECOS strongly recommends that going forward, the Corps and the Board initiate a series of public meetings/workshops that include public tours of both earlier completed bank/levee work and the proposed sites so that understanding of the need for the specific outcomes can be understood by community members. It is important to keep in mind that community residents live and visit the Parkway. They have a vision of the Parkway's beauty and what it affords for wildlife and native plants. The project as currently formulated will change the vision for twenty to thirty years – for some the rest of their lives.

ECOS stands ready to work with the County, other community groups and the project proponents to help in any way we can to expand community engagement, improve the project alternatives and accomplish a positive outcome for this project.



Ted N. Rauh
ECOS Water Committee Chair



Susan Herre
President, ECOS Board of Directors

Cc: Sacramento Area Flood Control Agency, Water Forum, Regional Water Authority