

Put Hold On C3B: Till Folsom Dam Raise, and See How Revetments Fare

To: ARCF_SEIS@usace.army.mil; PublicCommentARCF16@water.ca.gov

Cc: Susan E Rosebrough-Jones, National Park Service; Barbara Rice, National Park Service; Harry Williamson; Liz Bellas, Director, Sacramento County Regional Parks; KC Sorgen, Sacramento County Regional Parks

Subject: Put C3B on hold until Folsom Dam Raise Project is complete

Date: February 14, 2024

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.

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, as well as previous experience at other sites, suggests that the proposed methods may do more harm than good.



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.



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:

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

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.

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