

Two Rivers Trail: Written Comments re MND

Last Updated: December 4, 2018

Commenter	Date	
Individuals		
Julie Lincoln	October 27, 2018	
Jim Scrivner	October 27, 2018	
Carol V. Michael	October 31, 2018	
Michael O'Brien	November 1, 2018	
Leland H. Ruth	November 2, 2018	
Robert Montgomery	November 5, 2018	
Jason Lynch	November 12, 2018	
Eric Schranz	November 13, 2018	
Alison French-Tubo	November 20, 2018	
Thomas Cordano	November 21, 2018	
Mark Heilman	November 22, 2018	
Susan Hausmann	November 26, 2018	
Steve Anderson	November 28, 2018	
Emmy Mignano	November 28, 2018	
Gregory Mignano	November 29, 2018	
Nancy MacKenzie	November 29, 2018	
Stuart Reeves	November 30, 2018	
Horacio Porath	November 30, 2018	
Horacio Porath (2)	November 30, 2018	
Kate Riley	November 30, 2018	
Alex Burt	November 30, 2018	
Sidney Scheideman	November 30, 2018	
Robert Scheideman	November 30, 2018	
Eve Martinez	November 30, 2018	
Sheri Opp	November 30, 2018	
Tracy Keith	November 29, 2018	
David Moffatt	November 29, 2018	
Sean O'Brien	November 29, 2018	
Pam Kennedy	November 29, 2018	
Cheryl Franzi and Gregory Jamnetski	November 28, 2018	
Jane Hunter	November 30, 2018	

Tom Buford

From: Alex Burt <alexrburt@gmail.com>
Sent: Friday, November 30, 2018 2:19 PM
To: Tom Buford
Subject: Two Rivers Trail Project

Mr. Buford, Principal Planner

Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

November 30, 2018

Dear Mr. Buford;

I am a city of Sacramento resident. I live in the Two Rivers Trail project area **and/or** I visit the Two Rivers Trail project area on a regular basis. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail.* The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be

impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) *the planting location is suitable for elderberry growth and reproduction; and*
- 2) *the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine if the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City,*

North Sacramento, East Sacramento, and Richards Boulevard area, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,

Sidney and Alex Burt

Sent from my iPhone

Tom Buford

From: The Tubo's <tubofamily@gmail.com>
Sent: Tuesday, November 20, 2018 4:45 PM
To: Tom Buford
Subject: comments on Two Rivers Bike Trail Phase II

I have read the report and look forward to seeing the trail constructed, with the narrower width as discussed in the introduction. I see the impacts of the trail construction as being outweighed by the benefits of a smooth bike trail connecting existing sections.

Thank you, Alison French-Tubo
3798 Erlewine Circle
Sacramento, CA 95819

Two Rivers Trail Phase II

City of
SACRAMENTO

COMMUNITY DEVELOPMENT
DEPARTMENT

OCT 31 2018

OCT 31 2018

RECEIVED

Written comments on the IS/MND must be received **no later than 4 p.m. on November 30, 2018**. Comments may be submitted at this meeting, sent via email to tbuford@cityofsacramento.org, or sent via U.S. Mail (address included on front of comment card).

Name: Carol V. Michael

Organization: _____

Mailing Address: 4931 P. St 95819

E-mail: carolmichael9@icloud.com
Carolmichael9@icloud.com

Comment: Without going into the long drawn out
opposition arguments, suffice it to say:

- ① We have other far more pressing financial + cultural issues to address.
- ② Why not build a cyclist/pedestrian bridge near 80 cap city freeway / railroad bridge?
This addresses cycle-commuters + leaves the River park area wild.

Thank you for considering my thoughts.

Carol V. Michael
916 477-4092

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

Via email: tbuford@cityofsacramento.org

November 29, 2018

Dear Mr. Buford;

I am a city of Sacramento resident. I live in River Park directly adjacent to the Two Rivers Trail project area and I visit the Two Rivers Trail project area every day. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that severs the existing project area. The project area is currently in a relatively cohesive natural, undisturbed state, comprised of many large native trees, shrubs, vines, riverine soil, habitat mosaic and other natural features unique to a riparian area. The proposed project, a black asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. The contrasting element that is a black asphalt line will alter the natural character of this otherwise intact environment. Unless I'm convinced otherwise, this impact, in my mind, is un-mitigatable. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Water Quality/Storm Water Impacts

The American River is located in a High Risk Watershed (CA. State Water Board – High Receiving Water Risk Watershed GIS Method). The river is a candidate for consideration for placement on the list of impaired water bodies (303d), for TMDLs (Total Maximum Daily Load) – Decision ID 49714 - Final California 2014 and 2016 Integrated Report (303(d) List/305(b) Report). In reviewing the MND, I see no discussion regarding storm water runoff from impervious surfaces that will be created by paving an otherwise pervious surfaces. How will runoff be prevented from entering the river channel. Given it's candidacy for impairment, I would think this document needs to prove that this project will not further impair the water quality for TMDLs, hence adding more evidence for its candidacy.

In addition, a Storm Water Pollution Prevention Plan will need to be developed in order to secure the Construction General Permit for storm water. Has this been completed. If so, I'd like a copy of the permit.

4. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail*. The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area. It should also analyze the potential cumulative impacts created by other user groups that will potentially visit and use the area.

The project area is currently a natural, relatively undisturbed riparian area that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility. These impacts will change the character of the area from a pleasant, passive recreation experience to one that is interrupted by a more active and less peaceful one. Passive recreation should be measured for impacts to it. Those impacts need to be taken into consideration to determine its significance to the area users.

5. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) the planting location is suitable for elderberry growth and reproduction; and*
- 2) the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine if the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

6. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, and natural riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on

bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

7. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,



David Moffatt. LLA, QSD

5131 Teichert Ave.

Sacramento, CA 95819

Tom Buford

From: Emmy Mignano <emignano@surewest.net>
Sent: Wednesday, November 28, 2018 6:19 PM
To: Tom Buford
Subject: Two Rivers trail

As a resident of River Park and a regular user of the paths that border River Park, I have several concerns.

Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

I was a bicycle commuter for 18 years. I commuted by bike rain or shine, in the dark, in the wind, always using surface streets. The updates to Elvas Avenue could work for many people who prefer a less trafficked commute. Most bicyclists don't commute during the winter or during "bad" weather. Why pave unnecessarily?

With the improvements in bike tires, many bicycles can already access the trail that borders River Park. I have had to stand aside for large groups of bikes on weekends, and, most recently, Jump bikes. Does the plan provide for pedestrian safety? How will leashed dogs be accommodated?

It appears that the current users will be replaced by cyclists. How will that be an improvement?

Thank you for your time and attention to these matters.

Sincerely,
Emmy Mignano
5540 Caleb Avenue
Sent from my iPad

Two Rivers Trail Phase II

City of
SACRAMENTO

COMMUNITY DEVELOPMENT
DEPARTMENT

NOV 13 2018

Written comments on the IS/MND must be received no later than 4 p.m. on November 30, 2018. Comments may be submitted at this meeting, sent via email to tbuiford@cityofsacramento.org, or sent via U.S. Mail (address included on front of comment card).

Name: ERIC SCHRANE

Organization: _____

Mailing Address: 5323 JEROME WAY
SACRAMENTO, CA 95819

E-mail: _____

Comment: _____

PLEASE RECONSIDER THE TWO RIVERS TRAIL. AS AN AVID USER OF THE TRAIL, PAVING WILL CAUSE THE FOLLOWING:

- LESS OPTIONS FOR KIDS TO USE TRAIL DUE TO SPEEDING CYCLISTS.
- FEWER OPTIONS FOR THE BLIND/VI COMMUNITY. I RUN/GUIDE RUNNERS AND WE'LL USE USE OF THE TRAIL W/ ADDED TRAFFIC.
- HOWEVER, ENCROACHMENT ON TAX-PAYERS, VOTERS.

THIS IS INAPPROPRIATE AND WILL CHANGE THE FABRIC OF OUR WONDERFUL NEIGHBORHOOD.

Tom Buford

From: Eve Martinez <bkemart@yahoo.com>
Sent: Friday, November 30, 2018 6:47 AM
To: Tom Buford
Cc: Save Don't Pave
Subject: Mitigated Negative Declaration for Phase II of Two Rivers Trail Project

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

Via email: tbuford@cityofsacramento.org

November 30, 2018

Dear Mr. Buford;

I am a city of Sacramento resident, live in the Two Rivers Trail project area, and I utilize the Two Rivers Trail project area for recreational purposes on a regular basis. In light of the findings of the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project, I support further environmental review of the project; it is imperative that the impacts of the proposed project be properly identified, assessed, and mitigated.

My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two Rivers Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail.* The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing

colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) *the planting location is suitable for elderberry growth and reproduction; and*
- 2) *the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine in the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker

who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,

Eve Martinez
5620 Sandburg Dr.
Sacramento, CA 95819

Eve Martinez
bkemart@yahoo.com
916.730.5995

DEC 8 2018

RECEIVED 5705 Moddison Ave.
Sacramento, Ca. 95819
November 28, 2018

Dear Mr. Buford;

We are Sacramento city residents having lived in the community of River Park (near the Two Rivers Trail project area) for the last 35 years. We visit the Two Rivers Trail project area with our children and grandchildren on a regular basis. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are about issues of Transportation, Recreation, and finally the Aesthetics as follows:

Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. I avoid walking on bike paths because I am afraid of getting hit or of falling. There is no room for walkers on bicycle speedways. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete on this issue.

Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail*. The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, elderberry beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) to be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,



Cheryl Franzi and Gregory Jamnetski



Tom Buford

From: Gregory Mignano <gmignano@surewest.net>
Sent: Thursday, November 29, 2018 10:29 AM
To: Tom Buford
Subject: Two Rivers Trail

Dear sir:

I am a 34 year resident of River Park and oppose the proposed paving of parts of our levee. It is past time to halt degradation of natural landscape and habitat in our community.

As to the needs of cyclists, the city should continue creating bike lanes along city streets.

Thank you for your consideration,

Gregory Mignano

Sent from my iPhone

Two Rivers Trail Phase II – Public Comment

Name: Horacio Porath

Mailing Address: 5325 Sandburg Drive, Sacramento, CA 95819

e-mail: horacioqporath@yahoo.com

Comment: One of my main concerns about paving this section of the trail is the increased traffic by cyclist who do smoke cigarettes while riding bicycles. I use both the paved and unpaved sections of the trail daily. I run 8 to 10 miles per day along the parkway. I often see people riding their bikes while smoking, sounds absurd but it's true. Most fires I have seen are in close proximity of the paved trails. The rest are near the water caused by campfires. Bicycles don't have ashtrays and smokers are pigs! They don't put out their butts or carry them away! Many houses along this narrow section of the parkway would be in extreme peril when a fire does occur. I rarely see a smoker on an unpaved trail, but definitely more on a smooth paved trail.

Please do not pave the trail!

Two Rivers Trail Phase II – Public Comment

Name: Horacio Porath

Mailing Address: 5325 Sandburg Drive, Sacramento, CA 95819

e-mail: horacioqporath@yahoo.com

Comment: One of my main concerns is the safety to pedestrian trail users when bicycles on paved trails speed by. It's simply not safe to have bicycles riding by in close proximity to others who move much slower. Many people use the trail system for walking, jogging, inline skating and even pushing strollers or wheelchairs. I have been directly impacted by cyclists along the paved areas of the trail. When I skate I have no option but to stay on the pavement and cyclists have threatened me with abusive verbal foul language and even physical violence both by myself and in the presence of my young children. I have reported these events but little can be done since the culprits don't stop and identify themselves. The purpose of these threats and abuse is clearly to intimidate slower users of the paved trail. Many parents I know personally have expressed similar experiences including dangerously close calls and fears for the safety of their children and will not ride the paved areas of the trail system.

I strongly recommend using a non-pavement surface such as compacted gravel, decomposed granite or other alternative, so the speed of "road bikes" is naturally reduced. My other recommendation would be to prohibit bicycles along the trail while still allowing for disabled people to use an improved trail along this very narrow section of the parkway. Many state and national parks have ADA compliant trails that are not paved. I use this parkway every day of the year, I have cycled, run, skated the trail since 1985 and I have been on all of the trails. Please spare this very small section of the trail system where pedestrians can feel safe walking with their children and dogs to enjoy nature.

COMMUNITY DEVELOPMENT
DEPARTMENT

DEC 3 1988

4551 Moddison Ave
Sacramento, CA 95819

RECEIVED

Dear Mr. Buford,

As a resident of River Park ² after the presentation of the Two Rivers Trail Project at Calde School, I am concerned about the integrity of the levee, especially where the project cuts away a piece of the levee to continue the trail. This area of the levee has washed out repeatedly during high flood waters. Consequently there is no room to build a trail ² obviously this is a vulnerable spot along the river.

While at the meeting I overheard one of the project's team members state that the cutaway is fine, because this levee is 3' higher than the average federal levee. The sturdy wall was added for the safety of Sacramento residents, not to justify a trail.

-2-

The assessment of risks on this project is critical. An error in judgment such as minimizing or disregarding the integrity of the levee could be devastating to the city & state of California. I'd be interested in the study that discusses the risks of the project & especially the risk associated with cutting away of the levee & the building of a support wall. I am also interested in who performed the study & the details supporting the decision for the cutaway.

Sincerely yours,

Jane Hunter

Janeh2561@gmail.com

Tom Buford

From: Jason Lynch <jasonlynch@surewest.net>
Sent: Monday, November 12, 2018 9:15 AM
To: Tom Buford
Subject: Two Rivers Trail comment

Hello Two Rivers Team, I have a comment:

The existing low ground in Segment 3 sometimes floods under the UPRR. When that happens, users bypass the floodwater by using the top of the levee and crossing the RR tracks. The Two Rivers Project intends to add fences and locked gates that seem to eliminate that option, for the usual reasons.

Let's not create choke points that will close the trail. If you cannot keep the top of the levee open, please raise the grade a few feet under UPRR and Capital City Freeway.

Thank you,
Jason Lynch
Sacramento

Tom Buford

From: Jason Lynch <jasonlynch@surewest.net>
Sent: Monday, November 12, 2018 9:53 AM
To: Tom Buford
Subject: Two Rivers Trail comment

Hello Two Rivers Team, I have a comment:

The recently-completed Phase II trail at Sutter's Landing is very nice. However, the shoulder on the river side is not performing as advertised or designed, and I hope the upcoming Phase II trails might learn from the experience.

The shoulder width is presumably 4 ft on the river side of the trail, but there are long stretches (toward the UPRR bridge) where overgrowth makes it zero feet wide and pedestrians are forced onto the pavement. It's not clear that the design has effective weed barriers or a realistic perception of the maintenance practices. Mowing seems to occur on the levee side of the trail but not on the river side of the trail. The IS/MND claims that ARFCD vegetation removal will occur up to 4 times annually, mowing 4 ft beyond the shoulder. That would be 8 ft from the edge of pavement. That is clearly not happening. If you cannot depend on ARFCD, please make design changes (extra width and barriers) to ensure the purpose and need are provided by the project.

The shoulder design is graded to drain toward the river, with a break point where the granite shoulder ends and the fill begins. Looking at the recently-completed Sutter's Landing segment, that break point is rounded over and lost to time. What remains is walkable, but not always runnable because your right foot is nearly level but your left foot pounds a bit of a side slope. Runners will tell you that's a recipe for injury.

The part of the trail that drops from the Skate Park down to the toe of the levee has some drainage problems. It looks like the designers hoped surface flow would be effective, and it has been. The decomposed granite from the levee side of the trail is washed up and carried over the top of the pavement, making a real mess. When the surface flow hits the shoulder on the river side, it causes a lot of erosion and ruts up the shoulder so that it is not useable for pedestrians or runners.

Thank you,
Jason Lynch
Sacramento

Tom Buford

From: Jason Lynch <jasonlynch@surewest.net>
Sent: Monday, November 12, 2018 10:25 AM
To: Tom Buford
Subject: Two Rivers Trail comment

Hello Two Rivers Team, I have a comment:

Figure 1 of the IS/MND shows the Previously Constructed portion of Phase II in Sutter's Landing. The route traced on the map follows the road (28th St) from McKinley Village Way to the skate park. The route on the map does not follow the expected, existing bike trail that runs behind the bocce courts and the solar-covered parking lot. Judging by this figure the project's intent is to "share the road", and abandon the alignment next to the landfill.

My main comment is about that portion of the trail behind the bocce courts. If it is part of your final plan, that location has two low spots that trap runoff from the hillside, completely blocking the trail with a puddle 1-4" deep and 15' long. Because it stays wet for weeks at a time, stuff grows in the puddle and it gets a little slippery for runners. It needs drainage systems to take runoff under the trail instead of over it. I hope the Two rivers project can add that location to its scope.

Thank you,
Jason Lynch
Sacramento

Two Rivers Trail Phase II

Written comments on the IS/MND must be received **no later than 4 p.m. on November 30, 2018**. Comments may be submitted at this meeting, sent via email to tbuford@cityofsacramento.org, or sent via U.S. Mail (address included on front of comment card).

Name: Jim Scriver

Organization: None - Resident

Mailing Address: 112 Adm Way

E-mail: 4113 jim@gmail.com

Comment: Looks very well done the CEQA document,
as far as I can tell from the two presentations
I have attended. Looks like a fair consideration
of the natural and human environment.

Mitigation measures are well thought out
and more than adequate.

I fully support the construction of the
trail as proposed, preferring Alternative 3 of
the handicap access at Glenn Hall Park.

I can't wait to have safe convenient bicycle
access to Midtown.

Thanks
JS

Two Rivers Trail Phase II

City of
SACRAMENTO

Written comments on the IS/MND must be received **no later than 4 p.m. on November 30, 2018**. Comments may be submitted at this meeting, sent via email to tbuford@cityofsacramento.org, or sent via U.S. Mail (address included on front of comment card).

Name: Julie Lincoln

Organization: Resident

Mailing Address: 5708 Sandburg Dr Sacramento, CA 95819

E-mail: harriman@surewest.net

Comment: On the Two Rivers Trail Glen Hall Park
Access. The current alternative 1 puts
people very close to Lee ~~By~~ + Terrise Ruth's
house. Please make Alternative #3 the
primary access point for the trail. This
puts the Glenn Hall Park Access point
~~more~~ immediately behind the pool.

Thank you for all the hard work ~~the~~
and thoughtfulness that has gone into
the design of this trail!

November 30, 2018

Mr. Tom Buford, Principal Planner

Community Development Department

City of Sacramento

300 Richards Boulevard

Sacramento, CA 95811

Via email: tbuford@cityofsacramento.org

Dear Mr. Buford:

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. As a thirty-plus year resident of the River Park neighborhood, I have been fortunate to have access to one of the most unique environments in Sacramento—the dirt trail at the base of the American River Levee. I represent a variety of interests: I am a walker, a bicyclist, and a neighborhood activist. I helped start and continue to serve on the local Neighborwoods Project, the River Park Tree Canopy Project, which has planted over 125 trees in River Park since 2015. I am a member of the Advisory Group for the City of Sacramento's Urban Forest Master Plan Update project. I've served on a River Park traffic management committee for the City, which made recommendations on stop signs and speed bumps, among other measures. My son graduated from Caleb Greenwood; I served on the committee that recommended its transition to an International Baccalaureate program. I also serve as Vice President of Save Don't Pave, the community group which is working to preserve the toe trail in its wild state. My comments are based on my belief that walking, biking and otherwise exploring the levee toe trail is an invigorating, exceptional, enjoyable experience, and to pave it would be to lose this experience forever. There will be no going back.

At the very least, the City needs to complete a full EIR on this project. The following issues should be included:

- 1) There is a viable, already-completed, no-project alternative that the City has already spent well over a million dollars on: Guy West Bridge, CSUS side levee, Carlson Drive intersection, H Street to Elvas Avenue, to C Street to downtown. All done, very direct and bicycle-friendly. Just another alternative to the already-existing Jedediah Smith Trail right across the American River, that goes from the City of Folsom to Discovery Park. Of course, the Jedediah Smith trail is reachable by 3 bicycle-friendly bridges right near the project.
- 2) Flood Danger: The MND includes the question whether the project substantially increases the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood. MND p. 74
 - a) Will this project potentially endanger the population of River Park and, indeed, the entire City, from flooding? We are told that flood experts have signed off on the Incising Plan (including the American River Flood Control Board). However, the idea of a mid-bench trail has not been tested in the American River Flood Control area. The idea of a mid-bench trail was developed

after the ARPP update and the TRT Concept Plan. The Concept Plan Report “discussed the development of a paved trail along the top of the American River south levee.” “A mid-height bench alignment along the waterside levee slope of the entire length of the proposed trail segments was more recently considered in an attempt to minimize habitat impacts along the waterside toe of the levee and address concerns raised by residents of the River Park neighborhood. However, because the U.S. Army Corps of Engineers (USACE) considered placement of the trail on a mid-height bench on the waterside levee slope to be a risk to levee performance and would potentially increase the cost of levee operations and maintenance costs (emphasis added); the mid-levee alignment was determined to be infeasible where adequate space along the levee toe to accommodate the trail was present (James, Pers. Comm. 2018). (MND, p. 5)

One can ask: if a mid-height bench on the waterside of the levee slope is a risk to levee performance, according to the U.S. Army Corps, then why is it being proposed for a recreational trail? Does a recreational trail (that is duplicated nearby) merit the use of an expensive, untested, potentially unsafe levee treatment?

- b) “The project areas mapped as Zone AE [Segments 3-6] are designated as a Regulatory Floodway and are within the 100-year floodplain for the American River.” MND, page 73. What this means is the City is spending \$6.4 million to build a recreational bike trail in the floodplain of the American River. Question: how many times per decade will substantial portions of the trail be under water? Does the MND address this issue in terms of use, and maintenance costs? In fact, are any of the City’s substantial continuing maintenance costs included in the MND? I was not able to locate them.
- c) The Lower American River Task Force (Task Force) focuses on flood, environmental and recreational management issues affecting the lower reach of the American River from Folsom Dam to the Sacramento River. In 2002, Task Force participants cooperated in preparing the Lower American River Corridor Management Plan (RCMP) to provide a framework for integrated management of this reach of the river. The Bank Protection Working Group of the Lower American River Task Force has tentatively identified four segments of the south bank of the American River between Glenn Hall Park and H Street Bridge as “Tier 1”: “need to fix now – immediate threat of failure with 160K cfs flows.” How will the proposed incising into the river side of the levee be affected by such a failure? What additional costs will accrue to the City to repair a trail subject to periodic flooding?
- d) Levee safety and soil: “Past performance issues documented in the DWR ULE Supplemental Geotechnical Data Report (SGDR) for the American River study area (URS 2010) were reviewed to evaluate past performance of Segments 4 and 6 and to determine whether any prior levee instabilities had occurred within Segments 4 and 6. Available past performance records indicated a single past performance issue consisting of waterside erosion of the riverbank below the levee toe in Segment 4 (approximately Sta. 114+80 to Sta. 130+80 of the present project or DWR Sta. 1206+30 to Sta. 1222+30)” MND p. 67 Is this the “washout” event that destroyed the levee toe in Segment 4 in the 1986 flood? ... “Because the design, construction, and maintenance of levee improvements must comply with the regulatory standards of USACE and CVFPB, it is assumed that the design and construction of all levee modifications to accommodate placement of the trail would meet or exceed applicable design standards for static and dynamic stability, seismic ground shaking, liquefaction, subsidence, and seepage” MND p. 67. This is simply a statement of faith in the Federal standards, applied without regard to additional costs. The City needs to develop an estimate of costs associated with complying with federal standards, and explain how those costs will be covered in future, in order to meet CEQA standards.

- e) The United States Army Corps of Engineers has a new Section 408 policy document. The Section 408 permit is required in order for any levee change to be approved. (USACE New Draft Section 408 Policy Document EC 11650-2-220). So many engineering questions about the project, especially the plan to incise the Segment 4 section of the trail into the levee -- are resolved by saying that the USACE will have to approve the plan. How much additional expenditure – beyond the \$6.4 million already budgeted – may be required to meet the federal standards? There is no discussion of how much additional funding may be required. How many change orders will the Council need to approve in order to finish this trail to USACE standards?
- 3) Compliance with the American River Parkway Plan (ARPP)
- a) In the Sacramento County Compliance Review of the Project (November 15, 2018) the following statement was listed as an element of the ARPP:

“10.141 Maintain a suitable level of habitat connectivity between the Woodlake and Discovery Park East areas to provide a wildlife corridor. Key areas include the riparian corridor along the low flow channel and the area generally north of Northgate Boulevard.” Note that the proposed project could very easily damage habitat connectivity between the Paradise Beach segment and the Sutter’s Landing Park segment.
 - b) The ARPP says any features in the Paradise Beach segment should not attract groups of users. It’s fatuous to attempt to suggest that a multi-user paved trail designed to increase access to the area is “not attracting groups of users.” Certainly the trail would be used by “small group[s...] defined as any organized group of eleven to twenty persons; whether assembled for competitive or noncompetitive purposes.”
 - c) The Paradise Beach segment of the American River Parkway is considered a “Protected Area.” The Land Use section of the ARPP (p 117) says “facilities and other improvements are limited to those which are needed for the public enjoyment of the natural environment.” As TRT Phase II is designed as a through route, isn’t that inconsistent with this provision?
 - d) Consistency issue: The ARFCD Recreational Trails Policy was adopted in 2002 (per Tim Kerr letter, 11/9/2018), discouraging use of top of levee for recreational trail. Yet, the ARPP update (2008) included the following regarding the Two Rivers Trail segment between Sutter’s Landing and the H Street Bridge: “Support construction of a Two Rivers Trail extension to H Street that will provide direct connectivity from California State University Sacramento to downtown Sacramento. The trail should be constructed on top of the levee where feasible” P. 38.
 - e) Is it appropriate to base the trail approval on the American River Parkway Plan and the City’s General Plan CEQA when both documents assumed the trail on top of levee where feasible?
 - f) Note that ARPP said no building in area because of unstable soil. See comments on soil stability issues.
- 4) Consistency Issue between project as proposed and the Sacramento Bicycle Master Plan (2018) -- Equity:

The City Bicycle Master Plan (which does include this trail) calls for increased equity in funding bicycle projects by 2020 as one of the four goals of the Plan (BMP p.2) The Key Findings of this

Plan describes East Sacramento as “Less disadvantaged.” In fact, it is one of the “greenest” (i.e., least disadvantaged) areas in the City (BMP Equity Analysis Map, BMP p. 32). Yet, this \$6.4 million project, which duplicates a world-class bicycle trail across the river, and for which an on-road alternative already exists that has been recently built at over \$1 million (see alternatives analysis), is using limited active transportation funds and extensive support from City Staff, while other neighborhoods who don’t have the City’s active support get the message to do their project on their own (Morrison Creek Project).

Why would this trail be included in the Master Plan in contradiction to the Plan’s stated goals? According to testimony by Jim Brown, of SABA, at the October 18, 2018, meeting of the Sacramento Active Transportation Advisory Committee, many of “projects in the [Bicycle Master] Plan [have been in the Plan] for years and years” (Sacramento Active Transportation Commission video, Time register approximately 42 minutes). Brown further avers that the list of projects was not amended to meet the newer goals (including equity) because the City Attorney told staff that any change of projects would trigger an EIR. Brown stated that there is a categorical exemption for bicycle plans, and that Sacramento spent an inadequate amount of money on the Plan update.

- 5) Loss of Trees: The project will bring about the loss of at least 22 trees – some of them major shade canopy trees, all of them providing critical habitat for this rare riparian landscape. This MND does not inventory the trees. Further, its analysis is based on an outdated version of City Code. And the County ownership of this property raises the question: which set of tree protections should prevail – City or County? Finally the mitigation plan is not spelled out. The loss of any trees along this path will turn it from a verdant country experience – “the last wild space” – into a typical urban experience. The City needs to be cautious about accepting this MND document from the consultants – *given the ineptitude of this analysis of the tree situation*, are there other areas of this document based on outdated statutes or regulations, and using faulty understanding of the complex relationships between the many governmental entities involved in design, approval, construction, and operation of the project?
- 6) Caltrans Capital City Corridor: Caltrans is planning a major series of projects including widening the American River Bridge crossing of Business 80. This bridge goes over the proposed project. One possible alignment would move the bridge entirely. The widening, even if in the same footprint, would likely entail additional or moved supports. This can easily have an effect on the trail as it passes under Business 80. This is a reason to delay this project to avoid having to re-engineer the trail when the bridge is altered. Here’s the link to the website: Website: <http://www.dot.ca.gov/d3/capcitycorridor/subprojects/0H931/index.html>
- 7) Cultural Resources

“Built Environment Resources Levee Unit 118 Part 1 (American River South Levee) is considered significant under National Register of Historic Places Criterion A within the context of flood management and for its association with the SRFCP... Levee Unit 118 Part 1 is also considered to be a historical resource for the purposes of CEQA. As designed, the proposed project’s bike trail would be located primarily along the toe of the levee, with a portion of Segments 1 and 2 along the levee crown, and Segment 4 along the waterside levee slope. The proposed project would not alter the character-defining features of the levee (i.e. its compacted earth, slope, and crown).”

Let’s look at how the “character-defining features” of the levee might be altered by the project:

“Segment 4 is ... approximately 0.25 miles long... There is no defined bench on the water side of the levee in this segment. Consequently, to both avoid the potential for trail users to interfere with vehicles using the patrol road on the levee crown to perform levee maintenance and inspection activities, and limit the ability of trail users to see into the yards of residences located directly adjacent to the land side of the levee, this trail segment would be constructed on the water side slope on an artificial bench offset from the top of the levee with a reduced path width to limit impacts. The trail segment would also include a small retaining wall (emphasis added) along the inner edge of the trail to maintain the width of the levee crown for levee maintenance and patrol vehicle use”. MND p. 9-10

This means that for a distance of 1320 feet, there will be an incised trail and a retaining wall on the waterside of the levee. That seems to be a character-altering feature.

Of course, the City Council can easily decide that this project is simply not worth the money, the loss of habitat, the flood dangers, and the loss of this precious “last wild space.” I heartily endorse that plan and I urge the Council to direct these limited bicycle funds, and City resources, to neighborhoods where they are truly needed.

Thanks for your attention to this letter.

Kate Riley
5601 Monalee Avenue
Sacramento, CA 95819

COMMUNITY DEVELOPMENT
DEPARTMENT

November 22, 2018

NOV 23 2018

RECEIVED

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

Dear Mr. Buford;

I am a 63 year old city of Sacramento resident. I have lived in River Park since I was born and have used the American River Parkway behind River Park for recreation, both as a boy and as an adult. I believe the area should be preserved in its current state for future generations to enjoy as I have.

I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again, this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail.* The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, elderberry beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) *the planting location is suitable for elderberry growth and reproduction; and*
- 2) *the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine in the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,



Mark Heilman
141 Ada Way
Sacramento CA 95819

Tom Buford

From: Michael O'Brien <mikeobr1@icloud.com>
Sent: Thursday, November 1, 2018 11:56 AM
To: Tom Buford
Subject: Two Rivers Trail Phase II Comment Card

Name: Michael O'Brien
Organization: none/self
Mailing and Property Address: 230 Sandburg Drive
Sacramento, CA 95819
Email: mikeobr1@icloud.com

Comment: I believe the trail plan has been carefully considered, planned and vetted. I am in full support of it being constructed, as outlined, with a paved trail area along the base of the levy adjacent to the River park area/neighborhood, and ADA access from Glenn Hall Park.

I have lived River Park for 33 years, both along the river levy and elsewhere. We have raised our kids here and own a couple homes in the neighborhood. Improving access to the bike trail, and also to River Park will enhance livability, home values and public safety.

Thank you.

November 29, 2018
5747 State Avenue
Sacramento, CA 95819

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Subject: Public Comments on Two Rivers Trail Phase Two Initial Study/Mitigated Negative Declaration (IS/MND)

Dear Mr. Buford:

The subject IS/MND shows areas of permanent impacts (pages C-6 and C-7) and cut and fill limits (Figure 3, page 12). At the Fall RPNA meeting (October 6, 2018), the city provided an update on the project. The city's presentation included an alternative access design at Glen Hall Park. The original proposal would have constructed a paved ADA trail with switchbacks in the area behind the soccer/baseball field and possibly require removal of the row of conifer trees on the levee. The alternative design would be located behind the swimming pool, would require the removal of fewer trees at the south side of the levee, would have less visual impact and would cause less interference with athletic/recreational activity at the baseball /soccer field. The IS/MND does not show or discuss these two design alternatives.

While final designs would be prepared based on further geotechnical studies and in compliance with the USBC (page 67), deferring adequate description of a design feature (and its alternatives) such as the Glen Hall access that is an integral part of the trail project, is not in compliance with CEQA as it does not give the public an opportunity to comment knowledgeably, and as stated above, the two access alternatives and their potential impacts were not analyzed as discrete project features in the IS/MND.

Paving the lower trail would affect both the immediate viewshed and the natural experience it affords but also the more distant viewshed which would be more bare and stark as a result of the paved trail. Views from both the toe and top of the levee would be negatively affected by the project.

Large and mature trees along the existing trail afford shade, soften the view, and create a richer visual experience which would be negatively affected by the project. The values (visual, scenic, wildlife habitat) that these trees currently provide would not be attained by replacement trees for many years if not decades.

Other existing vegetation that grows densely along the trail softens and enhances the visual and natural experience and provides cover for wildlife. The existing established vegetation would be difficult to recreate. Its density helps to suppress weeds such as star thistle which could get a foothold as a result of ground disturbance by the project. Star thistle requires constant vigilance and is a visual and ecological blight that overwhelms native grasses and other vegetation.

Trail operation and maintenance (page 17) discuss steps the city would take to prevent spread of invasive plant species, but these measures are not included in Mitigation Measure 3-5 which does not address the disturbance that can lead to the spread of star thistle. Star thistle is common next to the paved trail on the north side of the river, so it appears that the maintenance measures the document proposes would not be adequate.

Mitigation Measure 3-6 says "the City shall purchase off-site credits at a mitigation bank or replant riparian trees and shrubs at a 1:1 ratio." Mitigation Measure 3-6 should require the City to replace riparian trees and shrubs on-site to reduce impacts to wildlife habitat, and aesthetic and recreational resources and that the purchase of off-site mitigation credits at a CDFG-approved mitigation site be considered as an additional mitigation rather than an option.

Mitigation Measure 3-6 says "No long-term management of landscaping or watering beyond that needed to initially establish the plants is anticipated to occur." The mitigation measure provides a maximum of six years to meet success criteria for riparian plantings. Considering the types of replacement vegetation, are two 3-year periods adequate and is CDFG in agreement. Will the planting plan (pg. 46) be approved by CDFG.

The environmental document has not provided substantial evidence that the proposed project would not result in adverse visual impacts. The environmental document should include visual simulations to accurately illustrate the potential impacts of the proposed project.

Thank you for considering my comments.

Sincerely,


Nancy MacKenzie

Mr. Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

Via email: tbuford@cityofsacramento.org

November 20, 2018

Dear Mr. Buford;

I am a city of Sacramento resident. I live in the Two Rivers Trail project area **and/or** I visit the Two Rivers Trail project area on a regular basis. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail.* The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) the planting location is suitable for elderberry growth and reproduction; and*
- 2) the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one

mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine in the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,

Pamela Kennedy

Your Name

Address

Two Rivers Trail Phase II

City of
SACRAMENTO

COMMUNITY DEVELOPMENT
DEPARTMENT

NOV 05 2018

Written comments on the IS/MND must be received **no later than 4 p.m. on November 30, 2018**. Comments may be submitted at this meeting, sent via email to tbuford@cityofsacramento.org, or sent via U.S. Mail (address included on front of comment card).

Name: ROBERT MONTGOMERY

Organization: River Park Neighborhood Assn.

Mailing Address: 5411 STATE AVE. SAC. CA. 95819

E-mail: RMML @ srewest.net

Comment: I support the proposed bike trail extension. As a biker, I look forward to having access to the new trail. I do not believe that it will cause problems for residents who live on or near the levee.

Mr. Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

Via email: tbuford@cityofsacramento.org

November 20, 2018

Dear Mr. Buford;

I am a city of Sacramento resident. I live in the Two Rivers Trail project area **and/or** I visit the Two Rivers Trail project area on a regular basis. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail.* The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) the planting location is suitable for elderberry growth and reproduction; and*
- 2) the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one

mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine in the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,

Robert Scheideman

Tom Buford

From: S O <buylowsellhigh@hotmail.com>
Sent: Thursday, November 29, 2018 2:45 PM
To: Tom Buford
Subject: Two Rivers Trail Phase II

Dear Mr. Buford;

My name is Sean and I have lived in River Park for about 30 out of my 35 years. I think one of the greatest parts of Sacramento is this beautiful natural area. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated. I feel most people are in agreement about global warming and would love to do our part by leaving this area alone. I understand the following is a templet, but as a father of soon to be two boys under 2 and a full time job, sometimes it is best not to try and reinvent the wheel.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail.* The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not

adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) *the planting location is suitable for elderberry growth and reproduction; and*
- 2) *the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine in the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,

Sean & Jeni O'Brien

5309 Sandburg Dr. Sacramento, CA 95819

Tom Buford

From: Sheri Opp <zzvovii@aol.com>
Sent: Thursday, November 29, 2018 11:19 PM
To: Tom Buford
Subject: Two River Trails Project

November 28, 2018

Dear Mr. Buford;

I am a city of Sacramento resident. I live in River Park on Sandburg Drive. I visit the area where the trail is proposed on a daily basis. I am a runner. I am extremely interested in the environmental review of this project. I feel a paved trail will irreversibly change the landscape that I know and love. I can not imagine a slab of pavement replacing the beauty of nature that is already there. When I run down toward Sutter's Landing, the area that is already paved, I choose to take the river trail instead of running on the pavement. The pavement and the barren vegetation next to it is so depressing and ugly. Living in a city, it is so important to have completely natural areas to escape to. I just do not understand the City's thought that pavement has to equal connectivity. Why can't the City have paved and unpaved sections? The trail in its natural state is already enjoyed by bikers. Paving that area will be a huge step backwards for Sacramento. That area will never be the same. It will never be a peaceful area again. **Please allow a full environmental impact report to be done.**

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail.* The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) *the planting location is suitable for elderberry growth and reproduction; and*
- 2) *the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine if the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, **I would like to request a full Environmental Impact Report (EIR) be completed.** The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,
Sheri Opp DDS,MSD
Stuart Reeves DPM
5315 Sandburg Drive
Sacramento, Ca 95819

© 2018 Oath Inc. All Rights Reserved

Send Message (Ctrl + return)

Tom Buford

From: Sidney Scheideman <sidneymorgan421@gmail.com>
Sent: Friday, November 30, 2018 2:13 PM
To: Tom Buford
Subject: Two Rivers Trail Project

Mr. Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

November 30, 2018

Dear Mr. Buford;

I am a city of Sacramento resident. I live in the Two Rivers Trail project area **and/or** I visit the Two Rivers Trail project area on a regular basis. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail*. The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat*. In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity*. The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) *the planting location is suitable for elderberry growth and reproduction; and*
- 2) *the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine in the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the

issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,

Sidney and Alex Burt

Sent from my iPhone

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

Via email: tbuford@cityofsacramento.org

November 28, 2018

Dear Mr. Buford;

This is a drastically redacted version of a template provided by the group known as Save Don't Pave. I am assuming you will receive numerous versions of their suggested letter so I have cut it back severely hoping it retains the main points because repetition of important points is often useful. **At the end of the note I have added item 7**, my personal comments regarding my experience with building bike paths in the city parks of Minneapolis.

I am now a city of Sacramento resident. I visit the Two Rivers Trail project area at least 5 days a week. Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project.

1. Aesthetics

The project area is currently in a near natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The project will substantially interfere with an important scenic resource. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. A geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND fails to fully analyze the importance of the project area to the VELB. The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs may grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact.

Finally, the MND does not adequately analyze the impacts to a riparian area. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information is incomplete.

6. **Adequate Environmental Review and Response to Comments.** While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project.

7. **Personal comments related to item 5 re transportation.** I moved to Sacramento from Minneapolis. Before I left there, the city built paved paths around many of the lakes in city parks for which Minneapolis is justly proud. There was immediate conflict as Sacramento has experienced mixing fast moving bicycles, scooters, roller bladers, etc with pedestrians. An initial attempt to paint lanes to separate the groups was an utter failure so separate paved paths eventually had to be built. Such a solution simply will not work for the Two Rivers Trail Project. If a paved bicycle path must be built it would be far better to build it on top of the levy where far fewer pedestrians walk.

Thank you for your time and attention to these matters.

Sincerely,



Steve Anderson

1055 Perkins Way

Sacramento, CA 95818

Tom Buford

From: Stuart Reeves <cofyco@hotmail.com>
Sent: Friday, November 30, 2018 9:44 PM
To: Tom Buford

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

Dear Mr. Buford:

I am a city of Sacramento resident. I live in the Two Rivers Trail project area and I visit the Two Rivers Trail project area on a regular basis. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated. Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, the project would expand recreational opportunities at the project site by offering a paved multi-use trail. The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, elderberry beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, (The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat. In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics

of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity. The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) the planting location is suitable for elderberry growth and reproduction; and
- 2) the City is able to protect the shrub and ensure that the shrub becomes reestablished.

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine in the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced

by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your consideration in these matters.

Stuart Reeves

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Blvd.
Sacramento, CA 95811

Dear Mr. Buford.

Most days, rain or shine, I walk both the upper and lower levies of the Two Rivers Trail project area. While walkers/runners, strolling families and bike commuters are always present to some degree the levies usage does change with the seasons. In the Spring and Fall we have Bike Clubs and Birders who heavily use the upper and lower levy respectively. This Sunday, a group of more than 50 cyclist rode the upper levy. This is not an uncommon weekend occurrence. Birders from all over the area come with binoculars and walk the lower levy trail sometimes setting up their cameras with tripods on the trail. The Birder's numbers can be a single person or in clubs of more than ten.

Currant use of the levies has naturally evolved to reflect best usage. Aesthetically and for safety the upper levy offers vistas and the sight lines needed for biking. While the lower levy trail's aesthetics offer the "country" feel that is difficult if not impossible to find within the City Limits of Sacramento. Many people who walk the lower trail stop mid-trail to point out a bird, animal or the close beauty of the river.

This year I've spotted coyotes with a kill, deer swimming, skunks, opossums, two species of rabbits and innumerable birds. None of these sightings are uncommon to the people who walk the lower trail. This irreplaceable experience of Nature will be lost if we, even with the best intentions, destroy what is there now and think we will be able to recreate it.

If straightening and paving occurs there will be no ability to watch for wildlife as walkers will be watching for bikes. The upper levy will still attract cyclist because of the good sight lines which means we will end up with two trails neither of which will be conducive for the contemplation of Nature.

Having walked and biked on many other American River Parkway trails there are none within the City of Sacramento that offer the same quality of easily viewable wildlife. I urge the City to reevaluate and perform a more extensive Environmental Impact Review of this project. It has not adequately addressed the damage it will do to the flora, fauna and the Sacramento public's ability to so readily access and view wildlife in the wild. While the trail was man-made it has evolved over decades into a nature setting and is worth preserving.

Respectively

Susan Hausmann
94 Sandburg Drive
Sacramento, CA 95819

Tom Buford

From: Thomas Cordano <tcord2@gmail.com>
Sent: Wednesday, November 21, 2018 11:01 AM
To: Tom Buford
Subject: Save Don't Pave

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

November 20, 2018

Dear Mr. Buford;

I am a city of Sacramento resident and I visit the Two Rivers Trail project (Erlywine access) area on a regular basis. I am

interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

Aesthetics

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the

existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail.

Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially

degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two

Rivers Trail as a base line of comparison.

Geology and Soils

Phase I of the Two River's Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

Recreation

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, the project would expand recreational opportunities at the project site by offering a paved multi-use trail. The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area. The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, elderberry beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the

MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists.

Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, (The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat. In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Many of the pedestrians are elderly. don't react quickly, nor hear very well. Paying attention to their dogs.

And people of all ages are prone to daydreaming. Escape -- that's one of the reasons people go the Yosemite, and the Erlywine river access.

Bicycles - Is there any speed limit imposed on them.

I just don't mean one on the books,
that has never been enforced.

I mean a speed limit, like those posted on streets and highways where people are cited sometimes.

Thank you for your time and attention to these matters.

Sincerely,

Thomas J. Cordano
967 El Dorado Way
Sacto., CA. 95819

Tom Buford

From: Tracy Keith <tracymkeith@gmail.com>
Sent: Thursday, November 29, 2018 10:12 PM
To: Tom Buford
Subject: Two Rivers Trail Project Public Comment

Mr. Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

Via email: tbuford@cityofsacramento.org

November 29, 2018

Dear Mr. Buford;

I am a city of Sacramento resident, living in the River Park neighborhood along the levee. I live in the Two Rivers Trail project area **and** visit the Two Rivers Trail project area on a regular basis. I am interested in the environmental review of this project, because I want to make sure the impacts are properly identified, assessed, and mitigated.

Please accept these comments on the Mitigated Negative Declaration (MND) being circulated for Phase II of the Two Rivers Trail project. My comments on resource areas discussed in the MND are as follows:

1. **Aesthetics**

The aesthetics of the proposed project is a key area of concern. While most people think a bike path is an almost invisible asset to the community, the fact is, the proposed project is a 14 to 22-foot paved path that bulldozes through the existing project area. The project area is currently in a natural, undisturbed state, including native trees, native bushes, sand, dirt, brush, habitat and other natural features unique to a riparian area. The proposed project, an asphalt and decomposed granite path that varies from 14 to 22 feet across, will impact a large swath of this riparian area in order to allow for construction of the trail, construction of permanent overhead structures, trail access for security and firefighting purposes, and on-going maintenance trucks and equipment. Comparing similar segments of the Two Rivers Trail (Phase I) shows the stark aesthetics that are necessary to construct and maintain a Class 1 bicycle and pedestrian trail. Therefore, I disagree with the analysis starting on page 21 of the MND related to whether or not the project substantially degrades the existing visual character of the site or its surroundings. The project will substantially interfere with an important scenic resource and substantially degrade the view of this existing scenic resource. This environmental impact has not been adequately analyzed. There needs to be an Environmental Impact Review to look at what the before and after aesthetics of the project will be, using existing, comparable trails and the recently constructed Phase I of the Two Rivers Trail as a base line of comparison.

2. **Geology and Soils**

Phase I of the Two Rivers Trail project encountered geotechnical issues which led to change orders costing hundreds of thousands of dollars. Per a January 9, 2007 City of Sacramento staff report to City Council:

The Geotechnical Engineers report found that the existing soil used to construct the original levee did not meet the current Department of Water Resources or American River Flood Control District's new specifications for levee fill material.

Given the city's knowledge and experience with a very similar project in close proximity to the proposed project, a geotechnical report should be prepared as part of the overall environmental analysis in order to adequately evaluate impacts. Once again this calls for an Environmental Impact Review. Mitigation Measure 6-1 defers mitigation by delaying the preparation of a final geotechnical investigation of the project, until after project approval. Extra costs and delays due to unexpected conditions and necessary re-engineering and approval could add to the already high cost of the project.

3. **Recreation**

Recreation is also a key area of concern. The proposed project introduces a number of new users to the project area, which, while a noble cause, may cause significant impacts. The MND states that the project will not cause significant environmental effects causing or accelerating substantial physical deterioration of existing area parks or recreational facilities. Page 86 of the MND states, *the project would expand recreational opportunities at the project site by offering a paved multi-use trail*. The project may expand recreational opportunities, specifically for cyclists, in the project area, but the analysis should be on whether or not the project will cause significant environmental effects by accelerating the substantial physical deterioration of the project area.

The project area is currently a natural, undisturbed riparian area, that offers users the opportunity to interact with wild life, natural vegetation, sand, dirt and brush. The construction of a 14 to 22-foot trail across and through the middle of the project area will accelerate the physical deterioration of an existing recreational facility. Current users visit the project area because of the natural, riparian texture. Sand and dirt crunching underfoot, native birds singing and flying through native brush, beetles running across dirt paths, native landscaping changing colors, and bushes flowering and developing berries are all integral elements of this recreation

facility. The project will impact recreation due to the construction and maintenance that will continue to physically deteriorate this natural facility. For example, page 39 of the MND states:

Maintenance activities would trim vegetation that grows to overhang the trail and results in a hazard to cyclists. Additionally, maintenance would include work within 165 feet of riparian habitat, mixed scrub habitat, and the elderberry shrubs within that habitat.

Page 39 also states, *(The project) would result in the permanent removal of approximately 0.95 acres of VELB (Valley Elderberry Longhorn Beetle), riparian, and mixed scrub habitat.* In order to construct and maintain a 14 to 22-foot trail, much of the natural elements that are the defining characteristics of this existing recreational facility will be significantly impacted. The MND does not adequately address the physical deterioration of this recreational facility or the specific elements that make it so unique as a natural recreational facility.

4. Biology

The MND discusses both temporary and permanent impacts to riparian habitat, protected trees and threatened or endangered species. However, the analysis was not complete nor rigorous enough given the exceptional riparian habitat and historic environmental value of the project area.

For example, the MND fails to fully analyze the importance of the project area to the VELB. Without this perspective, it is difficult to provide a meaningful evaluation of the impacts and the adequacy of mitigation. The MND reveals that the project will impact a large number of elderberry shrubs. However, it appears that the MND underestimated the number of elderberry shrubs that may be impacted by the proposed project. The United States Fish and Wildlife Service 2017 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) states that impacts to elderberry shrubs, and therefore to VELB, may occur as a result of projects within 165 feet of elderberry shrubs. The USFWS Framework also states, *Activities that may damage or kill an elderberry shrub (e.g., trenching, paving, etc.) may need an avoidance area of at least 6 meters (20 feet) from the drip-line depending on the type of activity.* The MND surveys for elderberry shrubs found a total of 501 elderberry shrubs within 165 feet of the project footprint. However, the MND reports that only some of the 501 elderberry shrubs surveyed would be impacted by the project. The MND does not provide an explanation for why all 501 elderberry shrubs would not be impacted. An analysis should be provided about why elderberry shrubs that could be impacted would not be affected by the project.

The MND also likely underestimates the impacts to VELB for segments 1 and 2 of the project. Because there is currently no funding for these segments and because a preferred alignment has not yet been determined, it will likely be a number of years before these segments will be constructed. Elderberry shrubs are likely to grow and increase in number during this time. Therefore, it is impossible to estimate VELB impacts for segment 1 and 2.

The USFWS Framework emphasizes the importance of keeping mitigation close to the site of impact. The MND indicates that mitigation for impacts to VELB will be accomplished by purchasing credits from an unspecified mitigation bank. However, the MND does not identify where credits would be purchased, therefore it is unclear whether mitigation would occur close to the site of impact. In addition, it appears that the City proposes to transplant the 56 elderberry shrubs that need to be trimmed. The MND states that the City will relocate elderberry shrubs as close as possible to their original location but only if:

- 1) *the planting location is suitable for elderberry growth and reproduction; and*
- 2) *the City is able to protect the shrub and ensure that the shrub becomes reestablished.*

The MND does not provide any assessment of whether these criteria may be met in areas in close proximity of impacts and it is therefore not clear whether it will be possible to relocate shrubs nearby.

Finally, the MND does not adequately analyze the impacts to a riparian area. The project will result in the substantial degradation of the quality of the environment and the reduction of habitat of endangered species of plant or animal species. While the MND does review temporary impacts due to construction, a majority of the mitigation measures only address the temporary impacts. The one mitigation measure that does address permanent impacts does not provide a significant level of detail to allow the reader to determine in the proposed mitigation is adequate. Replanting may or may not return the project area to its original state. Off site credits may or may not be available. More detail and analysis is needed in order to determine the adequacy of the proposed mitigation.

5. Transportation

On page 90 of the document, the MND states that project will not permanently adversely affect pedestrian travel, pedestrian paths or fail to provide for access by pedestrians. This analysis is not adequate as it completely ignores the potential conflicts between current users and users introduced by the project. The existing project area allows and invites pedestrians to experience a quiet, peaceful, natural and riparian environment. Pedestrians currently have adequate access, lines of travel and paths. The access, lines of travel and paths are not traditional in terms of paved sidewalks and asphalt, nor do they meet the requirements of a Class I bike path. However, the project area is a haven for pedestrians seeking a more natural walking experience. The MND discusses temporary impacts to pedestrians and determines these impacts to be less than significant. However, the permanent impacts are not analyzed. Given the project objective to *Provide alternative transportation access for commuters and residents in the eastern part of the City, CSUS, Central City, North Sacramento, East Sacramento, and Richards Boulevard area*, the MND inadequately analyzes the potential impact between the introduction of numerous commuters on bikes to the existing pedestrian environment. Frankly, this is one of the greatest concerns regarding the project. The City and County of Sacramento have had to historically address conflicts between pedestrians and cyclists on other segments of bikeways and parkways. The MND, in not reviewing historic information, and successful or failed attempts to manage the conflicts between these two users, is incomplete.

6. Adequate Environmental Review and Response to Comments

My final concern is related to the level of environmental review being completed. While I appreciate the city's effort to complete an Initial Study/Mitigated Negative Declaration, given the level of controversy surrounding this project, I would like to request a full Environmental Impact Report (EIR) be completed. The community needs to review a more robust and complete analysis of the project. In addition, an Environmental Impact Report allows for a longer circulation and comment period. Also, an EIR will likely include a public

meeting, and ideally that public meeting will include discussions with decision makers so that the community concerns and voices can be heard. While the city held a community meeting related to the MND, the meeting did not include a question and answer period with the single decision maker who attended the meeting, and it did not allow for a robust and public discussion regarding the issues. In the interest of transparency, an EIR allows for more rigorous analysis, discussion and transparency of the thought-process of decision makers.

Thank you for your time and attention to these matters.

Sincerely,

Tracy Keith
5325 Sandburg Drive
Sacramento, CA 95819

Attachments