

September 13, 2019

VIA ELECTRONIC MAIL:  
[RBess@cityofsacramento.org](mailto:RBess@cityofsacramento.org)

Ron Bess  
Assistant Planner  
Community Development Department  
300 Richards Boulevard  
Sacramento, California 95811

Re: Two Rivers Trail (Phase II) Draft Environmental Impact Report

Dear Mr. Bess:

I am writing on behalf of the American River Flood Control District (the “District”) to comment on the Two Rivers Trail (Phase II) Draft Environmental Impact Report (“DEIR”). The District has been protecting the Sacramento community from floods for over 90 years and is one of the most well-respected flood control agencies in California. The District has been involved in the Two Rivers Trail project from its inception to ensure that the project conforms to the District’s mission and benefits from the District’s long experience with safely maintaining and operating levees.

The District’s primary concern during this process has been to ensure that the trail is located along the toe of the levee in order to best protect public safety. The DEIR properly reflects the great lengths that the City has gone to adhere to the requirements of the District’s Recreational Trails Policy. The District very much appreciates the City’s efforts.

The District adopted its Recreational Trails Policy in 2002 to clarify how best to coordinate with recreational trail proposals being developed to interface with the urban levee system. The District’s policy indicated that the District supports recreational uses of the levee as long as flood control remained the primary purpose within the levee footprint. For that reason, the Policy states that trails are acceptable if, where feasible, they are located at the levee toe. This stipulation is to preserve the District’s free access to the levee crown for levee operations and maintenance activity. No obstructions are allowed on a levee crown because that is the essential zone of access and travel for operations, maintenance, inspections, and flood fights. Of the District’s 40 miles of levees in the Sacramento region, only 4.8 miles of the levee crown roadway is paved for trails. The rest of the levee crown roadway surface is gravel or chip seal and the majority of trail proposals have been successfully placed at the levee toe.

The trail policy discourages recreational trails on the levee crown because of the potential threat to members of the public. The District's maintenance crews are out on the American River levees using heavy equipment every work day and 24/7 during periods of high water. Just as with a construction site where members of the public are separated from heavy equipment, so it is with levees. Members of the public who choose to recreate on levees need – for their own safety – to be separated from the District's operation of heavy equipment. It is for this reason that the District strongly supports the City's proposal to have the recreational trail physically separated from and located off of the levee crown in the River Park area.

Twelve photographs are attached to this letter. Each photograph demonstrates heavy machinery at use on a local levee where the levee crown is also in use by the public. These photographs drive home the importance of avoiding the placement of trail alignments along the crown of a levee. The danger created by the close proximity of bicyclists and pedestrians to operating heavy machinery is acute, and the margin of safety for the general public using the levee crown is minimal. It is unacceptable to unnecessarily expose the public to such danger.

It is because of this concern for the safety of the recreating public and our awareness of the high risk of dangerous collisions, the District's Recreational Trails Policy requires that, where feasible, all trails must be off the levee crown roadway. The City's proposed trail alignment shown in the DEIR adheres to this requirement, and the District again thanks the City for making that a key criterion of the proposed project.

In the past, members of the public have raised concerns about the effect of the proposed trail alignment on habitat along the American River. Alternatives Two and Three satisfy CEQA's requirement to consider feasible alternatives to the proposed project by situating the proposed trail alignment on the crown of the levee. A trail alignment that is situated entirely on the crown of the levee, however, poses a significant risk to public safety, for the reasons stated above. Accordingly, the DEIR correctly rejects both alternatives.

Once again, thank you for the opportunity to review and comment on the DEIR for the Two Rivers Trail Phase II Project. The District supports the proposed project described in the DEIR and applauds the City's team for developing a plan that complies with the District's Recreational Trails Policy. The District feels this is the best way to provide a recreation trail and protect public safety.

Very truly yours,

David R.E. Aladjem

Enclosures

cc: Board of Trustees  
Tim Kerr, General Manager