



Save the American River Association

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February 10, 2011

Lieutenant General Robert L. "Van" Van Antwerp
Commanding General of the US Army US Army Corps of Engineers
441 G. Street, NW
Washington, DC 20314-1000

John Laird, *Secretary*
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Mark Cowin, *Director*
California Department of Water Resources
1416 - 9th Street, Room 1115-1
Sacramento, CA 95814

Elizabeth Vasquez
Office of Environmental Affairs
U.S. Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

Re: **Scoping Comments for the Joint Operations Center (JOC) in Sacramento, California**

Thank you for the opportunity to provide scoping comments on the proposed Joint Operating Center for water supply and emergency flood operations by the federal Bureau of Reclamation and the California State Department of Water Resources. Our comments are included below.

A State-Federal Emergency Flood Center in the Flood Plain?

If there are buildings in California that should be standing and operating after a catastrophic flood event, it should be those buildings that house the state-federal emergency flood operations center – a part of the JOC. The proposed siting of this center in the flood plain below the large Folsom Dam seems totally inappropriate.

The existing spillway capacity of the federal Folsom Dam is 567,000 cfs. One of the reasons for the additional spillway, which is under construction, is to prevent the overtopping and potential collapse of Folsom Dam in a very rare, catastrophic flood event. With the additional spillway, the total spillway capacity of the dam will be 850,000 cfs.

Six miles downstream from Folsom Dam is the relatively small, federal Nimbus Dam, which moderates the fluctuating flows from Folsom Dam's power operations for the river downstream. The spillway capacity of Nimbus is 300,000 cfs, which would mean that the major part of Folsom's maximum spillway release of 850,000 cfs would go over the top of the 1093 foot crest-length dam and across its surrounding lands. A thousand feet downstream is Hazel Avenue, with its bulky earthen ramp on the south side and then a sloping bridge span of about 270 feet over the river to the bluff on the north. Rather simple calculations imply that only part of the 850,000 cfs flow could go under the bridge, leaving deep flows to traverse Hazel Avenue on the south side and then into the preferred site for the JOC.

In any case, the Bureau and the Department should: (1) describe the effects of very low probability, catastrophic flows (PMF: probable maximum flood) on the JOC; (2) articulate the rationale for siting a secure, flood-emergency operations center in a flood plain below a major dam, and; (3) describe how long it would take to relocate the JOC staff and essential computer systems in the event relocation becomes necessary because of high flows; (4) estimate the impact on emergency flood operations if the staff and essential computer systems have to be relocated in the event of very high flows, and; (5) specify where the relocated JOC would be physically located.

American River Parkway

The proposed JOC site, as federal land, is not within the official American River Parkway, but anyone on the ground would not know that – this undeveloped site appears to be part of the American River Parkway.

The government does not site large water-flood operation centers in Yosemite for obvious reasons and should not site one in the American River area, the best river parkway in the western United States. Just as a note, the American River Parkway has a substantially higher annual visitation than Yosemite.

The existing Fish and Game Region II buildings, the Folsom fish hatchery, and associated parking lots are located adjacent to the river, on the south side. The American River bike trail traverses this area – further to the south and further away from the river. The JOC would put a number of large buildings, fences for security, and a large parking lot next to the bike trail – so the bike trail would go

between the Fish and Game facility and the JOC – creating a congested urban development in a parkway-floodway area that is largely undeveloped.

The EIR/EIS should describe the impact on parkway users, nearby homeowners and neighborhoods on both sides of the river, the visual impacts of large buildings, antennas, power lines, parking lots – and noise and air pollution.

Wildlife

The draft EIR should evaluate the impact on wildlife moving up and down the wildlife corridor that stretches from the confluence of the American and Sacramento Rivers to Nimbus Dam, to Folsom Dam, and then to the upper river canyons into the Sierra. If the JOC were sited at the American River site, the JOC and the existing facilities nearby would be the most significant barrier to wildlife migration for this entire corridor. We recognize that wildlife mobility is currently limited at the JOC site by the Fish and Game facility and the Folsom-South Canal.

Traffic

One of the selection criteria for a JOC site was that it was within a 20-minute commute from downtown Sacramento. Highway 50 is very congested, especially during rush hours, and travel is often substantially more than 20 minutes, and maybe up to an hour. This site does not appear to meet the “20-minute commute from downtown” criteria.

The JOC will have about 600 employees, most of whom will commute in their own vehicles. Light rail is about 1.25 miles from the proposed site, so very few employees should be expected to use light rail. There are only four public transit bus trips per day on Hazel Avenue Monday-Friday and none on the weekend, so JOC employees probably would not be able to use bus transportation.

The traffic on Hazel Avenue is already at level F (failing) and Highway 50 is incredibly congested. The draft EIR should evaluate the impacts on travel times and air pollution due to the additional traffic. The draft EIR should fully mitigate any adverse traffic impacts on Highway 50 and Hazel Avenue, so that the existing traffic situation does not become worse.

Food Service

One of the selection criteria for a site was that it would be near restaurants. There are no restaurants within a half-mile; probably the outside distance JOC employees would walk. About 7/10 of a mile away are a Starbucks, a

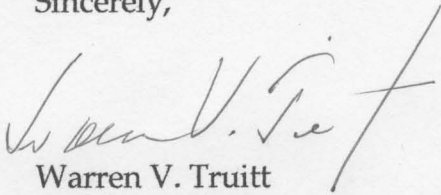
McDonald's and a Taco Bell. This site does not appear to meet the "restaurant" selection criteria.

Alternative Locations

The bureau and the department should evaluate alternative sites that are totally outside of the flood plain and that better meet the siting criteria: 20-minute drive from downtown and restaurants nearby. Mather or McClellan Airports should be considered.

Thank you for allowing us to comment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Warren V. Truitt". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Warren V. Truitt
President, SARA

c: SARA Board

e:mail: John Engstrom, DWR