

Regional Parks
Liz Bellas, Director



County Executive
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Divisions
Administration
Golf
Maintenance
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Recreation Services

County of Sacramento

To: Lower American River Conservancy Program Advisory Committee
From: Liz Bellas, Director, County of Sacramento Regional Parks
Date: March 23, 2020
Re: Lower American River Parkway Natural Resources Management Plan Update, Proposed Changes To Project Scope And Budget Re-Allocation

The intent of the Natural Resources Management Plane (NRMP), as stated in the original Request for Qualifications is "...to provide relevant and defensible information...for making informed decisions for managing, maintaining, and enhancing Parkway resources" (p. 43).

The original contracted scope of work, with MIG, Inc. as the lead consultant, was divided into five distinct phases:

- (1) Production of the NRMP document;
- (2) Environmental review of the plan (Programmatic EIR/EIS);
- (3) Establishment of a data management system;
- (4) Project management; and
- (5) Public outreach.

Proposed Change to Necessary Environmental Review Level

Initially, it was thought that most activities within the American River Parkway would be subject to Section 408 Permits from the U.S. Army Corps of Engineers (ACOE), and that the NRMP was critical for obtaining those permits.

In January 2019, County of Sacramento Department of Regional Parks (Regional Parks) and MIG met with ACOE 408 program staff. At this meeting, it was determined that programmatic permits would not be necessary for the NRMP, nor required by the ACOE. Rather, it was noted that the NRMP may fit under the "categorical permissions" program which states that the NRMP document "...can be used to expedite and streamline the review and decisions of requests that are similar in nature and have similar impacts to the USACE project and environment" (Army Corp of Engineers Categorical Permissions website).

These permissions may include but are not limited to the following:

- (1) environmental restoration;
- (2) erosion control;
- (3) fences, gates, and signage;
- (4) research and monitoring;
- (5) trails, roads and ramps, and
- (6) utility poles.

Overall, the implementation of the NRMP would not be considered a major Federal action subject to NEPA review.

Currently, Regional Parks and MIG are re-evaluating the proposed level of environmental review necessary for the NRMP in light of this new information, and Regional Parks no longer believes a combined CEQA/NEPA EIR/EIS is necessary for finalizing the NRMP.

CEQA review will be required for the NRMP, and it is anticipated that a Supplemental EIR (to the 2008 Parkway Plan EIR) will be the appropriate level of review since the recommended actions proposed in the NRMP may already be covered under the 2008 Parkway Plan EIR actions and/or mitigations. However, the recommended level of review will be determined in concert with the County of Sacramento Division of Planning and Environmental Review staff after careful examination of the level of impact expected from NRMP implementation. The Project Team will also need to review any changes in environmental conditions vis-à-vis the contents of the 2008 Parkway Plan EIR, and changes in CEQA regulations since 2008 (e.g., the addition of wildfire as a CEQA impact question). In doing so, separate technical studies for biological resources, cultural resources, air quality, and noise would not be prepared at a programmatic level.

Partner Agencies and Joint Agency Project Management Team

There are several partner agencies (e.g. SAFCA, ACOE, the Bureau of Reclamation, and the Water Forum) who have planned and proposed activities such as gravel augmentation, bank protection, levee work and mitigation and/or restoration projects that impact the Lower American River Parkway. These agencies are required to permit their own projects within the Lower American River Parkway, and in these cases, the role of Regional Parks is limited to coordination under the Wild and Scenic Rivers Act.

As per the project scope, Regional Parks and MIG are currently meeting with SAFCA staff to convene future Joint Agency Project Management Team meetings to coordinate and ensure these activities are adequately and accurately reflected in the NRMP.

The ability of Regional Parks to utilize these planned and in progress activities as a tool to meet goals and objectives of the NRMP constitutes a “win-win” scenario, as the scarce resources of Regional Parks can be used on projects not covered by other agencies. Additionally, as it is the responsibility of the respective agencies to compete

environmental review and permitting for each of these projects, those expenses would not need to be undertaken by Regional Parks, and potentially lessens the level of the environmental review needed for the NRMP.

Change In Scope For Additional Agency Coordination

During the course of preparation of the administrative draft of the NRMP, the acquisition, verification, and management of data required more rounds of review than originally scoped, and additional coordination with partner agencies was required. The purpose of this additional coordination was to obtain the latest information from partner agencies regarding their planned and in progress activities impacting the Lower American River Parkway. All of these activities have a direct correlation to the NRMP, and identified goals and objectives from the NRMP may be met through these projects. For example:

- (1) MIG attended multiple Bank Protection Working Group meetings, met with and coordinated activities with SAFCA, the Water Forum, multiple resource agencies and consultants in connection with bank protection and gravel augmentation projects.
- (2) MIG spent eight months obtaining all the data required for the NRMP, including the most up to date hydraulic studies. MIG was receiving this data as late as the end of 2019, resulting in additional rounds of data review and management by the Project Team.
- (3) MIG met in the field with agencies in September, 2019 to identify mitigation areas to be incorporated into the NRMP.

NRMP Implementation

The NRMP implementation action plan will include four types of management actions:

- (1) Site management (which may include restoration);
- (2) Visitor management (which includes interpretation and potential site closures);
- (3) Agency Coordination, Oversight, and Reporting; and
- (4) Monitoring.

Finalization of the implementation chapter of the NRMP is currently underway.

Public Outreach

Public Outreach will consist of public meetings, workshops and online (virtual meetings) comment.

Budget Reallocation

After the completion of the implementation chapter, and the final determination of the level of environmental review required, Regional Parks may need a budget reallocation to move funding from Phase 2 (Environmental Review) to Phase 1 (Production of NRMP document) and Phase 4 (Project Management)