MARIN COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

SANTA VENETIA FLOODWALL SUPPLEMENTAL ENVIRONMENTAL REVIEW AND DRAFT SUBSEQUENT MITIGATED NEGATIVE DECLARATION

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1. Comments and Responses

This document contains the comment letters on the Santa Venetia Floodwall Supplemental Environmental Review and draft Subsequent Mitigated Negative Declaration (SER/SMND) received during the public review period, and responses to those comments. Each comment letter or email is designated with a letter (A through J) in the upper right-hand corner of the page. Individual comments are labeled with a number in the margin. Immediately following each comment letter or email is an individual response to each numbered comment. Only comments on the scope of the Project and on the analysis and conclusions in the SER/SMND are responded to: comments expressing the commenter's support for or opposition to the Project, and comments addressing other issues not within the scope of the Project or subject to the California Environmental Quality Act (CEQA), are not responded to.

Changes to the text of the SER prompted by comments are indicated by ~~strike-throughs~~ for deletions and <u>underline</u> for additions.

Comments were received from the following individuals and organizations:

Letter Designation	Commenter's Name and Affiliation (if any)
A	Erin Chappell, California Department of Fish and Wildlife
B	Clare Krebsbach
C	Michelle Slade
D	Phillis Bennett
E	Monica Caston
F	Lynn Roth
G	Robert Dobrin
H	Rochelle Karter
I	Ellen Stein
J	Aaron Lai, Shimmick Construction

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Letter A

January 17, 2024

Luis Damerell, Project Manager
Marin County Flood Control and Water Conservation District
3501 Civic Center Drive, Suite 304
San Rafael, CA 94903
Envplanning@MarinCounty.org

Subject: Santa Venetia Floodwall Project, Subsequent Mitigated Negative Declaration, SCH No. 2019079013, Marin County

Dear Mr. Damerell:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Subsequent Mitigated Negative Declaration (MND) from the Marin County Flood Control and Water Conservation District (District) for the Santa Venetia Floodwall Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1] CDFW previously provided comments in response to the originally circulated MND.

CDFW is submitting comments on the Subsequent MND to inform the District, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

1 CDFW is a **Trustee Agency** with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on Projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a Project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA) or Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: Marin County Flood Control and Water Conservation District

Objective: Construct an approximately 7,200-foot-long, 11 feet high, and 14-inch-wide composite sheet pile floodwall on the south (right) side of South Fork Gallinas Creek.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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This structure would replace an existing timber-reinforced berm floodwall and provide improved protection from floods to approximately 900 homes located on the landward side of the floodwall. Sheet piles would be installed using a vibratory hammer. An upgraded timber-reinforced berm floodwall would be installed at six locations where outfalls or access constraints make installing sheet pile unfeasible.

A 10- to 18-foot-wide work zone along the length of the floodwall would be cleared to facilitate construction. In addition to land access from Vendola Drive, the contractor may access the work zone from South Fork Gallinas Creek. Water access would involve using an amphibious excavator to move material from a barge in South Fork Gallinas Creek to a slide pontoon, and from the pontoon to the work zone. Water access would occur in ten designated areas, each up to 30 feet wide and 100 feet long.

1 **Location:** The unincorporated Community of Santa Venetia, Marin County, between South Fork Gallinas Creek and Vendola Drive, and between 7 Vendola Drive on the upstream end to 825 Vendola Drive on the downstream end, with an approximate center point 230 feet northwest of the intersection of Vendola Drive and La Pasada Way at 38.0131°N, -122.5191°W (NAD 83).

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA either during construction or over the life of the Project. **The Project has potential to impact longfin smelt (*Spirinchus thaleichthys*), CESA listed as threatened species, as further described below. The Project also has potential to impact salt marsh harvest mouse (*Reithrodontomys raviventris*), CESA listed as endangered species, Ridgeway’s rail (*Rallus obsoletus*), CESA listed as endangered species, and California black rail (*Laterallus jamaicensis coturniculus*), CESA listed as threatened species. Thank you for including mitigation measures to avoid impacts to salt marsh harvest mouse, Ridgeway’s rail, and California black rail, which are also Fully Protected species as further described below.** Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain an ITP.

CEQA requires a Mandatory Finding of Significance if a Project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, &

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15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with CESA.

Lake and Streambed Alteration

1 An LSA Notification, pursuant to Fish and Game Code section 1600 et seq., is required for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to LSA Notification requirements. **As described in the Subsequent MND (page 23), the Project would impact a stream, therefore, an LSA Notification would be required. The Project has submitted an LSA Notification (EPIMS-MAN-14846-R3) to CDFW. Thank you for notifying pursuant to Fish and Game Code section 1600 et seq.** CDFW would consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement until it has complied with CEQA as a Responsible Agency.

Fully Protected Species

2 Fully Protected species, such as Ridgway's rail, also CESA listed as endangered species, salt-marsh harvest mouse, also CESA listed as endangered species, and California black rail, also CESA listed as threatened species, as described above, may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code, § 2081.15). Project proponents should consult with CDFW early in the Project planning process.

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COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the District in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, including those CDFW recommends below and in **Attachment 1**, CDFW concludes that an MND is appropriate for the Project.

I. Environmental Setting and Related Impact Shortcoming

MANDATORY FINDING OF SIGNIFICANCE. Does the Project have the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

COMMENT 1: Longfin smelt

Issue: The Subsequent MND does not evaluate potential impacts to longfin smelt. A report titled "Interdisciplinary Studies on Longfin Smelt in the San Francisco Estuary" documented longfin smelt within similar habitat near the Project location (Lewis et al. 2019). Based on the presence of potential habitat and proximity to known spawning locations, South Fork Gallinas Creek is an area where longfin smelt may occur and spawn.

3

Specific impact and why impact would occur: The Project could result in mortality of longfin smelt larva if they are crushed between the substrate and the amphibious excavator, slide pontoon, or construction matting during in-water work access activities, as larva are not sufficiently developed to move away from these Project activities. In addition, mortality of adults and larvae may result from hydroacoustic impacts caused by pile driving. Project activities which result in impacts including mortality would be a violation of CESA unless the Project obtains an ITP from CDFW.

Evidence impact would be potentially significant: Longfin smelt is CESA listed as threatened species and therefore is considered a threatened species pursuant to Section 15380 of the CEQA Guidelines. Impacts to longfin smelt could substantially reduce the species' population, which would be considered a Mandatory Finding of Significance pursuant to Section 15065, subdivision (a) of the CEQA Guidelines. Therefore, if longfin smelt are present in the Project area and would be impacted, Project impacts to longfin smelt would be potentially significant.

Recommended Mitigation Measures: For an adequate environmental setting and to reduce impacts to longfin smelt to less-than-significant, CDFW recommends including the following mitigation measures in the Subsequent MND.

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Longfin Smelt Avoidance. Access to the Project via water shall be conducted only between August 1 and November 30, when longfin smelt larva are not expected to be present in the work area, unless otherwise approved in writing by CDFW. The Project shall adhere to the work period and all other requirements of the LSA issued by CDFW for the Project.

Hydroacoustic Monitoring and Noise and Vibration Reduction. Pile driving shall not occur in the water. Sound pressure levels generated by work within the bed, bank, or channel of a stream, or by pile driving within 100 feet of surface water, shall be monitored and kept below thresholds that result in injury to fish, currently 206 decibel peak Sound Pressure Level (SPL) and 187 decibel cumulative Sound Exposure Level (SEL), at mid-depth, 10 meters from where work is occurring. If the SPL or SEL thresholds will be exceeded, Permittee shall contact CDFW within 24 hours and before continuing construction. 3

If SPL and SEL thresholds in the above measure may be exceeded, the Permittee will furnish, install, operate, and maintain a sound attenuation system to reduce noise generated. A design of the attenuation system shall be submitted to CDFW for written approval 14 days prior to initiation of construction (i.e., isolation casings, confined bubble curtain, unconfined bubble curtain, wood pile cushions). The system must be operating prior to beginning pile driving activity within a reasonable dispersal distance of the water where it is feasible for injurious sound levels to reach the water. If the attenuation system fails, pile driving shall immediately stop and may not resume at the location until the system is put back into operation.

Pile Driving Equipment. All piles shall be installed using a vibratory hammer. An impact hammer shall not be used.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDB. The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. 4

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the 5

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5 Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

6 CDFW appreciates the opportunity to comment on the Subsequent MND to assist the District in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alex Single, Environmental Scientist, at (707) 799-4210 or Alex.Single@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory), at Melanie.Day@wildlife.ca.gov or (707) 210-4415.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1. Draft Mitigation and Monitoring Reporting Plan

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2019079013)

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REFERENCES

7 CDFW. 2023. California Natural Diversity Database (CNDDB) Management Framework. California Department of Fish and Wildlife. Sacramento, CA. Website https://wildlife.ca.gov/Data/BIOS [accessed 20 December 2023].

Lewis, L., et al. 2019. Interdisciplinary Studies on Longfin Smelt in the San Francisco Estuary. University of California, Davis. Davis, CA. Website https://www.researchgate.net/publication/349428334_Interdisciplinary_Studies_on_Longfin_Smelt_in_the_San_Francisco_Estuary [accessed 22 December 2023].

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ATTACHMENT 1

Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
Mitigation Measure (MM)	**Description**	**Timing**	**Responsible Party**
MM BIO-6	*Longfin Smelt Avoidance.* Access to the Project via water shall be conducted only between August 1 and November 30, when longfin smelt larva are not expected to be present in the work area, unless otherwise approved in writing by CDFW. The Project shall adhere to the work period and all other requirements of the LSA issued by CDFW for the Project.	During Water Access for Duration of Construction	Project Applicant
MM BIO-7	*Hydroacoustic Monitoring and Noise and Vibration Reduction.* Pile driving shall not occur in the water. Sound pressure levels generated by work within the bed, bank, or channel of a stream, or by pile driving within 100 feet of surface water, shall be monitored and kept below thresholds that result in injury to fish, currently 206 decibel peak Sound Pressure Level (SPL) and 187 decibel cumulative Sound Exposure Level (SEL), at mid-depth, 10 meters from where work is occurring. If the SPL or SEL thresholds will be exceeded, Permittee shall contact CDFW within 24 hours and before continuing construction. If SPL and SEL thresholds in the above measure may be exceeded, the Permittee will furnish, install, operate, and maintain a sound attenuation system to reduce noise generated. A design of the attenuation system shall be submitted to CDFW for written approval 14 days prior to initiation of construction (i.e., isolation casings, confined bubble curtain, unconfined bubble curtain, wood pile cushions). The system must be operating prior to beginning pile driving activity within a reasonable dispersal distance of the water where it is feasible for injurious sound levels to reach the water. If the attenuation system fails, pile driving shall immediately stop and may not resume at the location until the system is put back into operation.	For Duration of Construction	Project Applicant
MM BIO-8	*Pile Driving Equipment.* All piles shall be installed using a vibratory hammer. An impact hammer shall not be used.	For Duration of Construction	Project Applicant

8

Letter A. Erin Chappell, California Department of Fish and Wildlife

A-1 This comment reviews California Department of Fish and Wildlife's (CDFW's) role in reviewing CEQA documents, and the agency's applicable regulatory authority.

A-2 The County appreciates CDFW's comments on the SER measures for fully protected species salt marsh harvest mouse, Ridgway's rail, and California black rail and will implement the measures included in the SER and LSAA (EPIMS-MAN-14846-R3), when issued.

A-3 CDFW states that Gallinas Creek may constitute spawning habitat for the federal candidate species longfin smelt, and that smelt eggs or larvae may be harmed by barge activity in the creek substrate during project construction. In addition, CDFW expresses concern that acoustic impacts from pile driving may affect juvenile and adult smelt which may stray into the creek.

This response evaluates the potential for longfin smelt to reproduce in Gallinas Creek and the potential for the Project to harm this species, based on information contained in this comment, a literature survey, and new information from a recent report on this subject commissioned by the District (Kleinfelder, 2024).

Longfin smelt preferentially spawn in fresh water, over gravel or sandy substrates, and avoid brackish water for reproduction (Moyle, 2022; Rahman et al., 2023). Gallinas Creek is primarily a tidal slough, with a muddy bottom (Cleengineering, 2018) and salinity levels approaching those of nearby San Pablo Bay (Kleinfelder, 2024). The comment cites a study by Lewis et al. (2019) which conducted sampling in the smaller channels abutting San Pablo Bay, including Gallinas and Miller Creeks, with negative results for longfin smelt. Larval longfin smelt were detected in the Petaluma River, Sonoma Creek, and Napa River exclusively upriver in freshwater areas.

While juvenile or adult longfin smelt could occasionally enter Gallinas Creek from the Bay, the Santa Venetia Floodwall area lacks suitable substrate and salinity conditions to support longfin smelt spawning. Therefore, there would be no impact to longfin smelt eggs or larvae from the Project.

Regarding potential hydroacoustic impacts to adult and juvenile fish, the Project would not conduct pile driving in the water, nor use impact hammers for pile driving. Impact hammers would not be effective for the Project due to their potential to damage the composite sheet piles. Sheet piles would be installed in upland areas within the existing earthen levee, as described in SER/SMND Chapter 1, Project Description. The hammer used to install the sheet piles operates using vibration,

not impact. This, in combination with the weight and the hydraulic pressure of the excavator, pushes the sheets into the ground. Piles would be driven to a depth of approximately 6 to 18 feet.

This method of sheet pile installation, in dry ground and using a vibratory hammer, would generate much lower sound levels than impact hammers (see SER/SMND Appendix C, Noise Technical Report, which reports noise and vibration levels recorded during a test of sheet pile installation at the Project site). Pile driving would not approach the injury level to fish, which, as stated in the comment, is 206 decibel peak, and 187 decibels cumulative. Underwater sound would be attenuated by the location of the sheet pile installation within the earthen berm. Thus, substantial adverse effects on adult or juvenile longfin smelt that might stray into the channel from San Pablo Bay would not occur.

As stated in SER/SMND, Section 2.4, Biological Resources, other juvenile or adult fish species, including steelhead or sturgeon, if present in Gallinas Creek during construction, would be able to swim away from mechanical disturbances related to Project construction. The same is true of juvenile or adult longfin smelt.

In summary, the Project would not have the potential to cause any substantial adverse impact to any life stage of longfin smelt.

Clarification of Construction Period

While not commented upon by CDFW in their comment letter, there is some ambiguity in the SER/SMND description of the planned construction period for the Project that is relevant to the analysis of potential impacts on longfin smelt and other sensitive species.

In Section 1, Project Description, the SER/SMND states that, “Work would commence in early May and would be completed by October, requiring one construction season to finish installation.” This may be interpreted as meaning that work would end by the beginning of October, by the end of September, or sometime during October. In Section 2.4, Biological Resources, the construction period is incorrectly stated in several instances as “May through September” or “May to September.”

In order to complete the work in one construction season, the District anticipates that work may be required to continue through to the end of October. This is suggested in SER/SMND Table 2-4, Project Timeline, which states that erosion control will be installed during sheet pile installation if construction occurs during the wet season after October 15.

The continuation of work into October would not be expected to have any substantial adverse effect on longfin smelt or other sensitive species, since October is outside of the nesting or spawning period for these species. The

Biological resources mitigation measures specified in the SER/SMND, in combination with anticipated conditions that would be contained in the Lake and Streambed Alteration Agreement that would be issued by CDFW for the Project, would continue to ensure no substantial harm to listed species, if construction continues in October. To remove the ambiguity regarding the duration of the construction period, and to incorporate the new information and analysis regarding longfin smelt, the following portions of the SER/SMND are revised as follows (deletions are ~~struck through~~; additions are underlined):

SER/SMND Section 1, Project Description, page 20:

Construction Schedule and Duration

The new floodwall would be installed at a rate of about 100 lineal feet per workday, requiring approximately 90-120 workdays to complete. Work would commence in early May and would be completed by the end of October, requiring one construction season to finish installation. Any work after October 15, or after the commencement of fall rains, may be subject to permit conditions such as installation of erosion controls imposed by California Department of Fish and Wildlife or other agencies.

SER/SMND Section 2.4, Biological Resources, topic a (page 42):

Fish and Other Aquatic Resources

The 2019 IS/MND did not address potential impacts to special-status aquatic biological resources or Essential Fish Habitat. Impacts to aquatic species were not expected from land-based construction on the timber-reinforced berm. The revised Project would use a barge to access the berm from South Fork Gallinas Creek, and the barge would sit on to the bottom of the channel at low tide. Federally l~~L~~isted sturgeon and steelhead may be present in the channel at the time of construction. However, the Project's work schedule from May through ~~September~~ October would avoid over-wintering fish and fish nursery sites; only stray juvenile fish would be likely to be present in the summer months. Longfin smelt, a state threatened and federal candidate species, may also be present in Gallinas Creek. Although recent region-wide surveys (Lewis et al., 2019) were negative for this species in the vicinity of Gallinas Creek, juvenile or adult fish may stray in from San Pablo Bay. Gallinas Creek does not contain suitable spawning habitat for this species, due to high salinity levels (Kleinfelder, 2024) and muddy bottom substrate (Cleengineering 2018); thus, there would be no impact to longfin smelt larvae or eggs. Mobile juvenile and adult fish would be able to avoid the barge if they were present in the channel, and no noise impacts would be expected to aquatic species from vibratory hammering on the berm approximately 50 feet from the channel. Damage to the

channel bottom from the barge would be temporary for the duration of construction; no long-term damage to Essential Fish Habitat is expected. Any increase in sediment delivery to the channel would be mitigated to a less-than-significant level by use of erosion control measures, as included in Mitigation Measure BIO-4 from the 2019 IS/MND. Thus, the current Project would not have a new or substantially more severe significant impact on aquatic species, and no additional mitigation is required.

SER/SMND Section 2.4, Biological Resources, topic a (page 40):

Salt Marsh Harvest Mouse, Ridgway's (California Clapper) Rail and Black Rail

The work proposed in 2019 within tidal marsh habitat was limited to pipe replacement and removal at the pump stations, planned to occur outside nesting season (September through January). The current Project plans to use water access to move materials to the worksite with a slide pontoon pulled by an amphibious excavator from the barge, which would be moored in the Gallinas Creek channel, across the marsh to the levee. Both the amphibious excavator and the slide pontoon would cross and temporarily disturb marsh vegetation at the water access points (see Project Description Figure 1-13) during installation of the composite floodwall. This work would occur from May ~~to September~~ through October, and has the potential for a substantially more severe significant impact than previously identified to nesting rails and salt marsh harvest mouse, if present, due to both its timing and the greater potential for damage to marsh habitat.

SER/SMND Section 2.4, Biological Resources, topic d (page 49):

Impact to nursery sites, specifically bird nesting habitat in the marsh, is a new significant impact, not previously identified in the 2019 IS/MND, due to the anticipated May ~~to September~~ through October work season. The temporary crushing of marsh vegetation beneath the barge and pontoons would have the potential to destroy bird nests, and the noise and other disturbance associated with construction could promote nest abandonment. This impact is potentially significant, but would be reduced to a less-than-significant level by implementation of revised Mitigation Measure BIO-1 and Mitigation Measure BIO-2, as well as Marin County Development Code requirements for protecting nesting birds. With implementation of Mitigation Measures BIO-1, as revised, and BIO-2 and Development Code Sec. 22.20.040(G), this impact would be reduced to less than significant.

Additionally, the following references are added to the end of the Section 2.4, Biological Resources:

References:

Cleengineering, 2018. Data Report: Characterization of the Sediment from the Las Gallinas Dredging Project: San Rafael, CA. Sediment Characterization Sampling and Analysis Results (SAR). January 28.

Kleinfelder, 2024. Gallinas Creek Longfin Smelt Assessment Memorandum by Rob Aramayo. April 15.

Lewis L., A. Barros, M. Willmes, C. Denny et al. 2019. Interdisciplinary Studies on Longfin Smelt in the San Francisco Estuary. University of California, Davis. Davis, CA. https://www.researchgate.net/publication/349428334_Interdisciplinary_Studies_on_Longfin_Smelt_in_the_San_Francisco_Estuary. DWR Contract #4600011196.

A-4 No reportable observations were made during the conduct of the environmental review.

A-5 The required fees will be paid upon filing of the Notice of Determination.

A-6 The District appreciates CDFW's comments.

A-7 These references were reviewed in preparation of the above responses.

A-8 Please see the response to comment A-3.

References:

Cleengineering, 2018. Data Report: Characterization of the Sediment from the Las Gallinas Dredging Project: San Rafael, CA. Sediment Characterization Sampling and Analysis Results (SAR). January 28.

Kleinfelder, 2024. Gallinas Creek Longfin Smelt Assessment Memorandum by Rob Aramayo. April 15.

Lewis L., A. Barros, M. Willmes, C. Denny et al. 2019. Interdisciplinary Studies on Longfin Smelt in the San Francisco Estuary. University of California, Davis. Davis, CA. https://www.researchgate.net/publication/349428334_Interdisciplinary_Studies_on_Longfin_Smelt_in_the_San_Francisco_Estuary. DWR Contract #4600011196.

Moyle, P.B. 2002. Inland Fishes of California, University of California Press.

Rahman, M., L. Lewis, N. Fangue, R. Connon, T-C Hung. 2023. Effects of Salinity on Fertilization, Hatching, and Larval Performance of Longfin Smelt *Spirinchus thaleichthys*. Aquaculture Research. https://doi.org/10.1155/2023/9984382 .

Letter B

Robin Fies

From: Clare Krebsbach <ckrebsbach@comcast.net>
Sent: Monday, December 18, 2023 9:44 AM
To: EnvPlanning
Subject: Santa Venetia Floodwall

[You don't often get email from ckrebsbach@comcast.net. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Mr. Damerell,
1 Please do everything possible to expedite the building of the levee. We NEED it. I have lived in Santa Venetia for 43 years, and know well the hazards of a levee that doesn’t hold back the tide.

Thank you,
Clare Krebsbach
112 Vendola Dr.

Letter B. Clare Krebsbach

B-1 This comment addresses the merits of the Project, not the environmental analysis.

Letter C

Robin Fies

From: Michelle Slade <micheslade@gmail.com>
Sent: Monday, December 18, 2023 3:45 PM
To: EnvPlanning
Subject: Supplemental environmental review

> You don't often get email from micheslade@gmail.com. Learn why this is important

Hi Luis,

1 Can you please explain the wooden structure replacement project along the odd numbers of Vendola? I just received a notice of availability and am confused - is this the same project as the levee project that was meant to occur a few years ago?

Thanks,
Michelle Slade
23 Vendola Drive
San Rafael

Michelle E. Slade
SladeByDesign
Interior Design / Project Consulting
Ph. +1 415.215.1521
micheslade@gmail.com

Letter C. Michelle Slade

C-1 Please see Chapter 1, Project Description, in the SER/SMND.

Letter D

Robin Fies

From: philis bennett <astrophil@att.net>
Sent: Tuesday, December 19, 2023 9:28 AM
To: EnvPlanning
Subject: santa venetia berm

> You don't often get email from astrophil@att.net. Learn why this is important

1 i am concerned about the vast amount of plastic involved in this project
and how it will be eventually discarded and/or released and eroded into the water and its effects on wildlife. thank you

philis bennett
astrophil@att.net

57 vendola drive
santa venetia 94903

Letter D. Philis Bennett

D-1 Please see the response to comment G-2.

Letter E

From: no-reply@marincounty.org
To: Luis Damerell
Subject: Santa Venetia Flood Wall Proposal
Date: Tuesday, December 19, 2023 9:47:03 AM

Monica Caston with email address castonm@comcast.net would like information about:
HI Lu,

1 Where can I locate the current design/ photos that is proposed for public comment on this project.
Thanks
Monica

Letter E. Monica Caston

E-1 Please see Chapter 1, Project Description, in the SER/SMND.

Letter F

Robin Fies

From: no-reply@marincounty.org
Sent: Sunday, January 14, 2024 8:32 AM
To: EnvPlanning
Subject: Santa Venetia Berm

Lynn Roth with email address lynnroth@karter.com would like information about:

1 The County is aware of this situation, several people including Luis Demerol have been out to the property and I am at odds with their conclusion. My property at 119 Vendola has a very large eucalyptus tree growing out of the berm and it is compromising the integrity of the berm by lifting it towards the water. If that tree fell it would certainly rip out a portion of the berm. I maintain that the County, whose mission it has been to maintain the berm is responsible for letting that tree become a problem - long before I was an owner. I disagree that it is my responsibility and that I should trade the expense for removing the tree for an easement. Easements to property are not for free and secondly, I would not sign an easement without knowing the entirety of the final plan. So far my concerns have not been answered. I want this statement to be on record. Thank you, Lynn Roth 1 /13 2024:

Letter F. Lynn Roth

F-1 This comment does not address the environmental analysis. Hazards posed by an existing tree growing on the berm are an existing condition, not a consequence of the Project.

Letter G

Robert Dobrin 215 Vendola Drive San Rafael California 94903 robertd@vendola.org

January 16, 2024

Mr. Luis Damerell - Project Manager
Marin County Flood Control and Water Conservation District
3501 Civic Center Drive, Suite 304
San Rafael, CA 94903

Dear Mr. Damerell;

1 Thank you for the opportunity to comment on the Supplemental Mitigated Negative Declaration (SupNegDec) for the Proposed Santa Venetia Floodwall - Supplement to the 2019 Gallinas Levee Upgrade Initial Study/ Mitigated Declaration (2019NegDec). Following are deficiencies in the present CEQA document.

Sheet Pile Wall Materials Not Specified

2 The materials proposed for the construction of the the sheet pile floodwall are not disclosed with any specificity. The environmental review states the sheet piles will be fabricated "*from a proprietary composite material"* (emphasis added) (SupNegDec p. 8). The composition of the materials must be understood and studied. For example, It must be known whether water immersion will leach toxic chemicals into Gallinas Creek, ground water or the earth. Knowing only the material is "proprietary" does not disclose enough information to make any meaningful conclusions about the sheet pile's environmental impact.

3 Furthermore, the manufacture of composite materials is energy intensive. Therefore, the impact of the material's manufacture on the climate must be analyzed. The materials may use petroleum products and/or other toxic materials such as recycled automobile tires.

4 All impacts of the materials that will be used for the flood wall's construction, including any materials that will be used to bind or join seams must be fully analyzed from manufacture to the end of their useful life and subsequent disposal. Possible detrimental impacts may include, but are not limited to, wildlife, groundwater, surface water, construction workers and sensitive receptors. Compliance with California 65, the Safe Water and Toxic Enforcement Act of 1986, is also required.

Demolition of existing public and private structures must be studied and mitigated

5 The impacts of demolition and disturbance of private and public structures has not been adequately analyzed.

6 Demolition of existing improvements inventoried in Table 1.2 (SupNegDec p.13) will disturb many decades old structures in and adjacent to Gallinas Creek. Some of these structures were built with construction materials containing hazardous toxins such as creosote and arsenic based wood preservatives. Pipes and drains may contain lead. Demolition or disturbance of docks, gangways, pilings, stairs and decking may release toxins.

7 Much, and perhaps all, of the 6500 linear feet of the current timber reinforced berm (TRB) is constructed of pressure treated fir (SupNegDec p.13) which is likely to contain Chromated Copper Arsenate (CCA) or other toxins. The TRB was constructed in the early 1980s before virtually all uses of CCA treated lumber were prohibited in January of 2004.

8 Disturbing and disposing of the TRB and other improvements, including the fill within the TRB may cause impacts not disclosed or mitigated in this Negative Declaration. These toxins may jeopardize the health of wetlands, wildlife, sensitive receptors and construction workers. The SupNegDec does not analyze the disposal of these materials or the fill.

Inventory of Structures to be Demolished is Not Accurate

9 The inventory of structures in Table 1.3 is not dated so it is impossible to determine if additional structures have been added or if any have been enlarged or removed.

10 As recently as September of 2023, Zone 7 Flood Control Zone Staff has cited the need for permanent easements, in part because they do not have access to the entirety of the proposed project site for inspection or

10 repair. Thus, Table 1.3 can not be accurate as all properties along the proposed project's length have not been inspected by County Flood Control Staff for improvements that may need to be demolished and removed.

11 Furthermore, the Negative Declaration is internally inconsistent. Figure 1-13 (SupNegDec p.22) shows an "Accessory Dwelling Unit or Similar" built over the existing Timber Reinforced Berm, however "Accessory Dwelling Unit(s) or Similar" is not included anywhere in the Table 1.8 inventory.

12 An accurate and recently dated inventory is required in order to draw conclusions about the environmental impacts of disturbance or demolition of existing structures to make way for this project.

Easements Create Foreseeable Changes to the Environment
CEQA guidelines state in Section 15126.2(d), a growth-inducing impact could occur if:

…the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

13 Acquisition of the easements proposed for the construction of this project may lead to foreseeable development and population growth contrary to the conclusion in Section 14 of the 2019NegDec. The area of the proposed permanent easements has increased by as much as 80% since the 2019NegDec (up to 18 feet wide now vs 10 feet wide in 2019). This will allow for even greater, more intensive, use of the land burdened by the easements. for flood control or other purposes. The easements create a significant change in land use which may lead to greater population, traffic, public and/or commercial use in the areas protected by the levee.

For example, if in the future, the easements make possible construction of a levee that meets the Federal Emergency Management Agency's definition of 100 year flood protection, the area protected by such a levee would be eligible for the development of denser housing, hospitals or schools that is currently limited in the existing flood plain by local, California and Federal regulations. As discussed below, it is reasonably foreseeable that broad easement language would lead to undisclosed environmental impacts.

The California Supreme Court has held in *Union of Medical Marijuana Patients, Inc. vs City of San Diego (August 2019)* that proposed land use changes, as we have here, are indeed a CEQA project that requires study and may not be deferred.

It should be noted that Flood Control Staff insists this project is not feasible without permanent easements. It should be further noted that it is impossible to evaluate foreseeable growth impacts of these easements since their scope was not available during the 2019NegDec comment period nor is it available now. However, during a communication for the subsequently abandoned TRB project described in the 2019NegDec, the County Real Estate division provided an easement document with the following language:

(A) Permanent Easement for, but not limited to, the purposes of laying down, locating, constructing, reconstructing, removing, replacing, repairing, maintaining, operating and using, as the District may see fit, for flood control purposes including levees, flood barriers, drainage water facilities, channels, ditches, culverts, and all necessary fences, protective barriers, fixtures, facilities, and access for use in connection there with or appurtenant thereto, in, under, over, along, upon, and across said easement…

Clearly the above easement language remove an "*obstacle to population growth*" that is not addressed in the 2019NegDec nor the SupNegDec:

The precise scope of the easements, along with any future opportunities they afford, must be disclosed and analyzed as part of this project or as a separate project.

Sincerely,

Robert Dobrin

Letter G. Robert Dobrin

G-1 The SER/SMND fully meets the requirements of CEQA and was prepared in accordance with the State CEQA Guidelines and the Marin County Environmental Impact Review Guidelines. The commenter does not demonstrate that the SER/SMND contains any deficiencies.

G-2 A detailed analysis of the potential for the proposed composite sheet pile flood wall to degrade water quality as a result of contact with stormwater runoff, tidal or flood waters, or groundwater over the life of the Project is presented in Initial Study Section 2.10 under Topic 10a. As described in Section 2.10, the use of composite sheet piles is an industry long-term standard practice for use in shoreline protection, sea walls, and marinas, and use of composite sheet piles was the recommendation following comprehensive analysis of alternative materials for the proposed Project. The EverComp range of sheet piles produced by Everlast Synthetic Products were analyzed in the Basis of Design report completed for the proposed Project. Such composite sheet piles are resistant to UV degradation, limit seepage, and are corrosion resistant and durable in environments with high corrosive potential, such as when submerged in salt water, or in more extreme environmental conditions, such as when exposed to abnormal pH levels, extreme temperatures, or corrosive chemicals. Based on the analysis and supporting evidence, the Initial Study conclusion that the resistance to corrosion and breakdown under extreme environmental conditions minimizes and/or avoids the potential for contamination of soil and water over the life of the composite sheet piles is well supported.

G-3 Analysis of air emissions (including GHG emissions) and other toxic or hazardous materials or emissions associated with manufacture of a product that would be used in construction of the Project is beyond the scope of a CEQA analysis.

G-4 The Project will comply with all regulatory and legal requirements regarding handling and disposal of hazardous and non-hazardous materials and worker safety. Please see SER/SMND Section 2.9, Hazards and Hazardous Materials, topics a-c; and Section 2.19, Utilities and Service Systems, topic e.

G-5 Demolition of existing structures is described in SER/SMND Chapter 1, Project Description, and analyzed in Chapter 2, Supplemental Environmental Review Checklist.

G-6 Please see the response to comment G-4.

G-7 Please see the discussion of disposal of pressure-treated lumber on page 116 of the SER/SMND.

G-8 There are no known contaminants in the fill material making up the existing berm. The commenter does not provide any evidence that there are contaminants in the fill or other elements of the TRB, other than pressure-treated wood. Please see responses to comments G-4 and G-7.

G-9 The list of structures, infrastructure, trees, and vegetation that would be removed or demolished during Project construction presented in Table 1.2 (not Table 1.3, as erroneously stated in the comment) is current as of the release of the SER/SMND in December 2023.

G-10 Table 1.2 is based mostly on a review of air photos.

G-11 Figure 1-13 is schematic and does not show an actual accessory dwelling unit. It is consistent with the statement on SER/SMND page 13: To create the work zone, the contractor would need to remove docks, gangways, decks, stairways, *small buildings*, trees, vegetation, TRB, and landscaping from the levee. (emphasis added).

G-12 SER/SMND Chapter 1, Project Description, describes the proposed Project at a sufficient level of detail for environmental analysis under CEQA. The impacts of demolition are included in the analyses in Chapter 2, Supplemental Environmental Review Checklist.

G-13 The potential for the Project to induce substantial, unplanned population growth is considered in Section 2.14, Population and Housing. That analysis concludes that there would not be a significant impact of this kind. The Santa Venetia neighborhood is fully built-out. Any incremental increase in population that might be indirectly prompted by a decrease in flood risk in the neighborhood would not be expected to be substantial. The commenter provides no substantial evidence to support a fair argument that any such impact would be significant.

The proposed easements themselves would not directly result in any adverse environmental impacts, but would enable construction and future maintenance of the Project, the impacts of which are discussed in SER/SMND Chapter 2, Supplemental Environmental Review Checklist. Easements would prohibit other structures on the land within the easements, so development or intensification of use that could result in increased population would not occur.

References

Civic Knit, Engeo, DAC Associates, and CSW|ST2, 2023. Santa Venetia Floodwall, Basis of Design and Project Alternatives, Marin County, California. Prepared for the Marin County Flood Control and Water Conservation District, March 2023. Version 2.0

Wentland, David P.E. and Coastal Engineer, 2013. A Designer's Introduction to Development, Design, and Application of Vinyl and Composite Sheet Pile.

Letter H

Robin Fies

From: Robin Fies
Sent: Wednesday, January 17, 2024 8:51 AM
To: EnvPlanning
Subject: FW: Comments to Mitigation

From: Rochelle Karter <rochelle@karter.com>
Sent: Tuesday, January 16, 2024 4:00 PM
To: Luis Damerell <Luis.Damerell@MarinCounty.gov>
Subject: Comments to Mitigation

1 Regarding this CEQA Negative Declaration Review, the requirements state that the Initial Study include the description of the ultimate project. This was completed and accepted. Since that project was found to not be viable, mostly due to budget concerns, a completely new project has been recommended by consultants. Is it proper to only provide a supplement and Mitigated Negative Declaration, which this is, when a very large percent of the information has had major revision, including materials, machinery, work area requirement, depth, species accommodation, costs and access, etc., are all different from the Initial Study?

2 Some of the current project description does not seem to reflect prior plans and statements made to those of us who have the current "berm" on our properties in Flood Zone 7. Some of these plans my pertain to environmental issues, but since the plans are in no way complete it is difficult to comment on their possible effects.

3 For instance, the access described MAY be from the water side through barges and such type os equipment, or MAY be through land and via our properties. The actual equipment and its sizes and availability have not been secured (some were hopefully to be available through new German design). Water access has been told to us over many prior years to be absolutely not permissible by more agencies than are listed in this review, BCDC, Army Corp of Engineers and some others. The Gallinas creek is so silted in that it seems difficult to imagine without first dredging (which has been denied due to environmental concerns in the past.

4 P. 20 does not reference the pre-construction removal of structural elements such as docks, fences, stairs, decks, the storage of these, and any environmental effects.

5 P.45 states that future monitoring requiring maintenance insures that any future construction would be done with only hand tools. Can this assurance be made?

6 Other environmental concerns may include additional substantial erosion and how this effects the slumping of our properties.

7 I was present for some of the "testing" of sheet piling installation performed by the Consultant. They did not use the material suggested herein plans, but used metal sheet piling which has different ratings. In cursory investigations it appears that the type of material subsisted for our installation in this report requires a major earthen build-up on the property side;. This has not been explained or described.

8 It was told to us for many years that whatever the material or method, be it sheet piling or wood construction, that it had to be exactly the same and one unit throughout in order to provide flood protection, with no breaks. Now it is stated that where there are current or required exits/pipes for extraction of water from the street sewers and pumps,,beneath the TRB, a different portion or type of TRB would be inserted. Which is accurate?

9 We definitely need upgraded flood protection. There are many issues, as always, for this project. Many in the Zone have always contended that the only solution would be a locking gate east of the North canal entry. This has always been stated to be too expensive, need too much manual activation (but no more than required for many others gates throughout Marin or for the maintenance required for pumps that are now manually activated). The current cost of this project has not been determined. Perhaps this should be re-evaluated. And the current "plan "is very far from being assured viability.

10 Lastly, I do not understand why we do not add height and depth to the many that are rebuilt and repaired each year with our Flood Zone 7 funds. It was stated a the last meeting that all the new and still viable ones will be destroyed for the new project because funding cannot be applied for except for continuous projects. I find this rule or law or determination to be illogical and think it should be challenged by those who represent us.

Thank you,
Rochelle Karter

Letter H. Rochelle Karter

H-1 Pursuant to the State CEQA Guidelines Section 15162, changes to a previously approved project require examination of the proposed changes, changed circumstances, and new information to determine whether the revised project would result in new significant impacts or a substantial increase in the severity of a previously identified significant impact. The SER/SMND fulfills this requirement. As discussed in SER/SMND Chapter 3, Summary and Conclusion, the Project would result in one new and one substantially more severe significant impact, but these can be reduced to less than significant with identified mitigation measures. Consequently, a Subsequent Mitigated Negative Declaration (SMND) may be prepared, pursuant to State CEQA Guidelines Section 15162.

H-2 Project plans, as described in SER/SMND Chapter 1, Project Description, are substantially complete, and sufficiently detailed for the environmental analysis.

H-3 The SER/SMND considers the potential for impacts associated both with water access and land access. Water access would, as suggested by the commenter, require permits from several agencies, as discussed in SER/SMND Chapter 1, Project Description.

H-4 Demolition of existing structures is described on SER/SMND page 13, and analyzed throughout Chapter 2, Supplemental Environmental Review Checklist.

H-5 The restriction to use of hand tools only in revised Mitigation Measure BIO-1 applies to construction in sensitive habitats. All mitigation measures are mandatory and are legally enforceable, and will be the responsibility of the District. See SER/SMND Appendix A: Mitigation Monitoring and Reporting Program.

H-6 The potential for the Project to result in increased erosion is examined in SER/SMND Section 2.7, Geology and Soils. No new or substantially more severe significant impact is identified. The commenter does not provide substantial evidence to support a fair argument of a significant impact of this kind.

H-7 The commenter is mistaken: the sheet pile installation test conducted on November 2, 2022, used composite sheet piles, not metal. Building up earthen material on the land side of the levee would not be required for the Project.

H-8 Because of the depth to which the sheet piles must be driven, a different method of achieving flood control is necessary at the location of the pipe outfalls, as described in SER/SMND Chapter 1, Project Description.

H-9 Project cost or financial feasibility is not considered in a CEQA document. Alternatives to a project must be examined in an Environmental Impact Report (EIR), but not in an Initial Study, or in a supplement to an Initial Study. Project

alternatives were considered in the 2023 Basis of Design Report (Civic Knit et al, 2023).

H-10 Please see the response to comment H-9. Reconstruction of the TRB was considered as an alternative in the 2023 Basis of Design Report (Civic Knit et al, 2023)

References:

Civic Knit, Engeo, DAC Associates, and CSW|ST2, 2023. Santa Venetia Floodwall, Basis of Design and Project Alternatives, Marin County, California. Prepared for the Marin County Flood Control and Water Conservation District, March 2023. Version 2.0

Letter I

Robin Fies

From: ellen stein <sfeval1@yahoo.com>
Sent: Thursday, January 18, 2024 12:03 PM
To: EnvPlanning; Luis Damerell
Subject: Fw: Public Comment for proposed Santa Venetia Floodwall

> You don't often get email from sfeval1@yahoo.com. Learn why this is important

I sent this email from another email account and it seems as though it did not go through. Please let me know if you received this.
Thank You,
Ellen Stein

----- Forwarded Message -----
From: Ellen Stein <sfskyway@hotmail.com>
To: ellen stein <sfeval1@yahoo.com>
Sent: Thursday, January 18, 2024 at 11:57:11 AM PST
Subject: Fw: Public Comment for proposed Santa Venetia Floodwall

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From: Ellen Stein <sfskyway@hotmail.com>
Sent: Wednesday, January 10, 2024 1:47 PM
To: envplanning@marincounty.org <envplanning@marincounty.org>; Luis Damerell <ldamerell@marincounty.org>
Subject: Public Comment for proposed Santa Venetia Floodwall

Marin County Flood Control District,

1 I have concerns about the 15-ton 8 feet wide excavator required to install the sheet piles . I am unsure how that piece of equipment will navigate through my property without damaging anything. I hope my property is not one of the ten properties selected to allow equipment access. In previous reports, the land and where the levee sits are on and has been settling over the years. Subsidence of 12 inches by 2050 is predicted in this report. Has there been any study or analysis on what affect the 15-ton piece of equipment will have on that land? The report also states that even the weight of a timber levee can cause potential settling. I also have

2 concerns about what damage the vibration may have on structures, concrete platforms and plants within the vicinity of the project within my yard.

3 The flood wall is described as 14 inches wide, yet the work zone has gone from 10 feet (previously) to 18 feet wide for easements. The report also indicates that the sheet pile needs an anchor or backed up soil for more stability. We have been told that easements are necessary in order to get any Grants, but we have never seen anything in writing to verify that. It appears there is a push to get easements for the greatest amount of land needed before the project is finalized with a definitive plan and funding. I am not willing to agree to an easement until I know exactly what will be constructed and that it is a viable project with funding. It is not even apparent that all the permitting agencies have given approval for this project. It seems there are still aspects of this project that need to be worked out and finalized. Unfortunately, I honestly don't believe we will ever get the funding for this project to move forward and have taken steps to provide flood barriers to protect my home.

Sincerely,

Ellen Stein
211 Vendola Drive

Letter I. Ellen Stein

I-1 The equipment proposed to construct the Project would not cause additional settlement. Settlement that occurs within the Project area is caused by the placement of fill on the original ground surface. This creates additional weight on subsurface layers of soil, which over time squeezes out water from the soil pores, causing the ground to subside. This occurs over a long period of time, typically decades. The weight of the equipment that would be used for Project construction would be a short-term load and would not cause ground water to be forced out of the soil. In addition, the equipment's tracks spread the pressure of the machine over a large surface area, reducing the pressure on the ground and preventing any localized settling or subsidence.

I-2 Ground vibration from equipment operation is not expected to be of sufficient intensity to result in damage to structures, as discussed in SER/SMND Section 2.13, Noise and Vibration, topic b. See also SER/SMND Appendix C, Noise Technical Report.

I-3 The width of the easements would be sufficient to enable equipment access for Project construction. The proposed sheet pile wall would not need anchors or to be backed by soil. The Project has not been approved.

Letter J

Robin Fies

From: Aaron Lai <alai@shimmick.com>
Sent: Monday, December 11, 2023 2:56 PM
To: EnvPlanning
Subject: FW: Proposed Santa Venetia Floodwall Update
Attachments: NOA_Proposed_SV_Floodwall.pdf

> You don't often get email from alai@shimmick.com. Learn why this is important

Hi Luis,
Thanks for sending this over. I am Aaron Lai, from Shimmick Construction, a general contractor and we are very interested in bidding the above project. May I know when is the anticipated bid advertisement for this project?

Thank you and best regards,

Aaron Lai
Project Manager, Northwest Division
Foster City Levee Improvement Project
Cell: (415) 265-1167
alai@shimmick.com

Shimmick
1 Harbor Center, Suite 200
Suisun City, CA 94585
shimmick.com

1

From: Marin County Flood Control and Water Conservation District <camarin@public.govdelivery.com>
Sent: Monday, December 11, 2023 2:38 PM
To: Aaron Lai <alai@shimmick.com>
Subject: Proposed Santa Venetia Floodwall Update

> You don't often get email from camarin@public.govdelivery.com. Learn why this is important

You are subscribed to Marin County Flood Control District – Flood Zone 7: Santa Venetia

The Marin County Environmental Planning Division has released the Supplemental Environmental Review and Subsequent Mitigated Negative Declaration for the Proposed Santa Venetia Floodwall.

The project's environmental webpage includes the NOA (also attached) and the environmental review documents.

If you wish to comment, please email envplanning@marincounty.org before the end of the review period on Tuesday, January 16, 2024 at 4:00 p.m.

Note: You have received this email because of your previous request to receive electronic notifications about meetings for the advisory board to Flood Zone 7 or events of the Marin County Flood Control and Water Conservation District. Please email ktownsend@marincounty.org and ask to be removed from this list should you no longer wish to receive notifications.

- NOA Proposed SV Floodwall.pdf

1

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This email was sent to alai@shimmick.com using GovDelivery Communications Cloud on behalf of: County of Marin, California

Not all events are sponsored by the County of Marin. County of Marin sponsored events are required to be accessible. If you are a person with a disability and require an accommodation to participate in a County program, service, or activity, requests may be made by calling (415) 473-4381 (Voice), Dial 711 for CA Relay, or by email at least five business days in advance of the event. We will do our best to fulfill requests received with less than five business days' notice. Copies of documents are available in alternative formats upon request.

1

From: no-reply@marincounty.org
To: Luis Damerell
Subject: Enquiry on Proposed Santa Venetia Floodwall Update
Date: Monday, December 11, 2023 3:48:26 PM

Aaron Lai with email address alai@shimmick.com would like information about:
Hi, may I know when is the anticipated date for the construction of this project?

Robin Fies

From: Aaron Lai <alai@shimmick.com>
Sent: Monday, January 8, 2024 9:30 AM
To: EnvPlanning
Subject: Proposed Santa Venetia Floodwall

> You don't often get email from alai@shimmick.com. Learn why this is important

Hi Luis,
My name is Aaron Lai from Shimmick Construction. We are interested in bidding the above project. May I know when would the construction bid be advertised for this work?

1 **Thank you and best regards,**

Aaron Lai
Project Manager, Northwest Division
Foster City Levee Improvement Project
Cell: (415) 265-1167
alai@shimmick.com

Shimmick
1 Harbor Center, Suite 200
Suisun City, CA 94585
shimmick.com

Letter J. Aaron Lai, Shimmick Construction

J-1 This comment does not address the environmental analysis.

2. Changes to the Supplemental Environmental Review/Subsequent Mitigated Negative Declaration

Several changes are made to the Supplemental Environmental Review/Subsequent Mitigated Negative Declaration (SER/SMND) in response to the comments received, and to clarify that the District intends the construction period for the Project to continue through the end of October. These change only amplify and clarify the text and do not alter conclusions regarding impacts or mitigation measures. No recirculation is required for these minor modifications, per State CEQA Guidelines section 15073.5(c)(4). (deletions are ~~struck through~~; additions are underlined):

SER/SMND Section 1, Project Description, page 20:

Construction Schedule and Duration

The new floodwall would be installed at a rate of about 100 lineal feet per workday, requiring approximately 90-120 workdays to complete. Work would commence in early May and would be completed by the end of October, requiring one construction season to finish installation. Any work after October 15, or after the commencement of fall rains, may be subject to permit conditions such as installation of erosion controls imposed by California Department of Fish and Wildlife or other agencies.

SER/SMND Section 2.4, Biological Resources, topic a (page 42):

Fish and Other Aquatic Resources

The 2019 IS/MND did not address potential impacts to special-status aquatic biological resources or Essential Fish Habitat. Impacts to aquatic species were not expected from land-based construction on the timber-reinforced berm. The revised Project would use a barge to access the berm from South Fork Gallinas Creek, and the barge would sit on to the bottom of the channel at low tide. Federally l~~L~~isted sturgeon and steelhead may be present in the channel at the time of construction. However, the Project's work schedule from May through ~~September~~ October would avoid over-wintering fish and fish nursery sites; only stray juvenile fish would be likely to be present in the summer months. Longfin smelt, a state threatened and federal candidate species, may also be present in Gallinas Creek. Although recent region-wide surveys (Lewis et al., 2019) were negative for this species in the vicinity of Gallinas Creek, juvenile or adult fish may stray in from San Pablo Bay. Gallinas Creek does not contain suitable spawning habitat for this species, due to high salinity levels (Kleinfelder, 2024) and

muddy bottom substrate (Cleengineering 2018); thus, there would be no impact to longfin smelt larvae or eggs. Mobile juvenile and adult fish would be able to avoid the barge if they were present in the channel, and no noise impacts would be expected to aquatic species from vibratory hammering on the berm approximately 50 feet from the channel. Damage to the channel bottom from the barge would be temporary for the duration of construction; no long-term damage to Essential Fish Habitat is expected. Any increase in sediment delivery to the channel would be mitigated to a less-than-significant level by use of erosion control measures, as included in Mitigation Measure BIO-4 from the 2019 IS/MND. Thus, the current Project would not have a new or substantially more severe significant impact on aquatic species, and no additional mitigation is required.

SER/SMND Section 2.4, Biological Resources, topic a (page 40):

Salt Marsh Harvest Mouse, Ridgway's (California Clapper) Rail and Black Rail

The work proposed in 2019 within tidal marsh habitat was limited to pipe replacement and removal at the pump stations, planned to occur outside nesting season (September through January). The current Project plans to use water access to move materials to the worksite with a slide pontoon pulled by an amphibious excavator from the barge, which would be moored in the Gallinas Creek channel, across the marsh to the levee. Both the amphibious excavator and the slide pontoon would cross and temporarily disturb marsh vegetation at the water access points (see Project Description Figure 1-13) during installation of the composite floodwall. This work would occur from May ~~to September~~ through October, and has the potential for a substantially more severe significant impact than previously identified to nesting rails and salt marsh harvest mouse, if present, due to both its timing and the greater potential for damage to marsh habitat.

SER/SMND Section 2.4, Biological Resources, topic d (page 49):

Impact to nursery sites, specifically bird nesting habitat in the marsh, is a new significant impact, not previously identified in the 2019 IS/MND, due to the anticipated May ~~to September~~ through October work season. The temporary crushing of marsh vegetation beneath the barge and pontoons would have the potential to destroy bird nests, and the noise and other disturbance associated with construction could promote nest abandonment. This impact is potentially significant, but would be reduced to a less-than-significant level by implementation of revised Mitigation Measure BIO-1 and Mitigation Measure BIO-2, as well as Marin County Development Code requirements for protecting nesting birds. With implementation of Mitigation Measures BIO-1, as revised, and BIO-2 and

Development Code Sec. 22.20.040(G), this impact would be reduced to less than significant.

The following references are added to the list on pages 51-52:

References:

Cleengineering, 2018. Data Report: Characterization of the Sediment from the Las Gallinas Dredging Project: San Rafael, CA. Sediment Characterization Sampling and Analysis Results (SAR). January 28.

Kleinfelder, 2024. Gallinas Creek Longfin Smelt Assessment Memorandum by Rob Aramayo. April 15.

Lewis L., A. Barros, M. Willmes, C. Denny et al. 2019. Interdisciplinary Studies on Longfin Smelt in the San Francisco Estuary. University of California, Davis. Davis, CA. https://www.researchgate.net/publication/349428334_Interdisciplinary_Studies_on_Longfin_Smelt_in_the_San_Francisco_Estuary. DWR Contract #4600011196.

3. Summary and Conclusion

This document includes comments received by Marin County Flood Control and Water Conservation District during the public review period for the Supplemental Environmental Review/Subsequent Mitigated Negative Declaration (SER/SMND) for the Santa Venetia Floodwall Project, and responses to those comments. This document should be considered along with the SER/SMND when the SER/SMND is adopted. One comment prompted revisions to the SER/SMND Section 2.4, Biological Resources. The revisions only clarify and add specificity to the analysis, and do not alter conclusions regarding the significance of impacts or the effectiveness of mitigation measures. There have been no changes to the Project or changed circumstances under which the Project would be undertaken requiring further analysis or leading to revisions in the SER/SMND. None of the circumstances described in State CEQA Guidelines § 15073.5(b) have occurred, meaning recirculation of the SER/SMND is not required.

The conclusion of the SER/SMND remains unchanged: the Project, with the incorporation of mitigation measures identified in the previous, 2019 Initial Study/Mitigated Negative Declaration, as well as new and revised mitigation measures identified in the SER/SMND, would have only less-than-significant environmental impacts. None of the comments provides substantial evidence to support a fair argument that the Project would have a significant effect on the environment. Therefore, per State CEQA Guidelines § 15064(f)(1), an Environmental Impact Report (EIR) is not required.

Appendices

A. Distribution List

B. Report Preparers and Resumes

Appendix A:
Marin County Water Conservation and Flood Control District Distribution List for the SER/SMND

Distribution List for the SER/SMND

Category	Company/Organization	FirstName	LastName	Address	City	State	Zip
A Proj Sponsor							
B Clearinghouses	ABAG Clearinghouse	Attn: Dayle	Farina	375 Beale St., Suite 700	San Francisco	CA	94105
B Clearinghouses	State Clearinghouse			1400 Tenth Street	Sacramento	CA	95814
B Fed	U.S. Army Corps of Engineers		Branch Chief	1455 Market Street, FL 17	San Francisco	CA	94103
B Fed	U.S. Fish & Wildlife Service		Supervisor	2800 Cottage Way #W-2606	Sacramento	CA	95825
B Fed	U.S. Fish & Wildlife Service San Francisco Bay National Wildlife Refuge Complex	Winnie	Chan	9500 Thornton Ave.	Newark	CA	94560
B State Agencies	Air Resources Board			P.O. Box 2815	Sacramento	CA	95812
B State Agencies	BAAQMD/Planning & Research	Suzanne	Bourguignon	939 Ellis Street	San Francisco	CA	94109
B State Agencies	CA Air Resources Board	Mary D.	Nichols, Board Chair	P.O. Box 2815	Sacramento	CA	95812
B State Agencies	CA Coastal Commission			45 Fremont Street, Suite 2000	San Francisco	CA	94105
B State Agencies	CA Coastal Conservancy			1330 Broadway #1300	Oakland	CA	94612
B State Agencies	CA Dept. Fish & Wildlife	Karen	Weiss			CA	
B State Agencies	CA Dept. of Boating and Waterways		Division Chief	2000 Evergreen St., Suite 100	Sacramento	CA	95815-3888
B State Agencies	CA Dept. of Conservation	Div of Mines & Geology		801 K St., Ste. 2015	Sacramento	CA	95814
B State Agencies	CA Dept. of Fish & Wildlife	Karen	Weiss	2825 Cordelia Road, Suite 100	Fairfield	CA	94534
B State Agencies	CA Dept. of Water Resources		Chief	P.O. Box 942836	Sacramento	CA	94236
B State Agencies	CA EPA			1001 I Street	Sacramento	CA	95814
B State Agencies	CA Native American Heritage Commission			915 Capitol Mall, Rm 364	Sacramento	CA	95814
B State Agencies	CA Natural Resources Agency	John	Laird, Secretary	1416 9th Street, Suite 1311	Sacramento	CA	95814
B State Agencies	CA Office of Emergency Services		Environmental Officer	3650 Shriever Ave.	Mather	CA	95655
B State Agencies	CA Office of Historic Preservation			P.O. Box 942896	Sacramento	CA	94296-0001
B State Agencies	CA Regional Water Qlty Control Board	Nicole	Fairley	1515 Clay Street, #1400	Oakland	CA	94612
B State Agencies	CA Resources Agency		Office of the Secretary	1416 9th Street, 13th Floor	Sacramento	CA	95814
B State Agencies	CA State Lands Commission	Jennifer	Lucchesi, Executive Officer	100 Howe Ave, Suite 100-South	Sacramento	CA	95825
B State Agencies	CA State Water Resources Control Brd	Div of Water Quality		1001 I Street, P.O. Box 2000	Sacramento	CA	95812-2000
B State Agencies	CalEPA	Matthew	Rodriguez, Secretary for	1001 "I" Street	Sacramento	CA	95814
B State Agencies	SF Bay Conservation & Development Comm.			455 Golden Gate Ave., Suite 10600	San Francisco	CA	94102-7019
C Local Gov	City of San Rafael Community Development	Paul	Jensen, Community	1400 Fifth Avenue, P.O. Box 151560	San Rafael	CA	94915-1560
C Local Gov	Marin/Sonoma Mos. & Vector Con. Dis	Philip	Smith, District Manager	595 Helman Lane	Cotati	CA	94935
C Serv District	Flood Control 7 Adv. Brd.				San Rafael	CA	94903
C Serv District	Las Gallinas Sanitary Dist.		District Manager	300 Smith Ranch Rd.	San Rafael	CA	94903
C Water Dist.	Marin Municipal Water District		Environmental Services	220 Nellen Avenue	Corte Madera	CA	94925
D CDA Staff	Community Development Agency	Tammy	Taylor	3501 Civic Center Drive, #308	San Rafael	CA	94903
D CDA Staff	Community Development Agency	Rachel	Reid	3501 Civic Center Drive, #308	San Rafael	CA	94903
D CDA Staff	Marin County CDA-Planning	PC Secretary		3501 Civic Center Drive, #308	San Rafael	CA	94903
D County Official	Marin County BOS	Supervisor Damon		3501 Civic Center Drive, #329	San Rafael	CA	94903
D Marin County Dept	Marin Co. Counsel	Jenna	Brady	3501 Civic Center Drive, Rm. 275	San Rafael	CA	94903
D Marin County Dept	Marin Co. DPW	Counter		3501 Civic Center Drive, Rm. 304	San Rafael	CA	94903
D Marin County Dept	Marin Co. DPW, Land Use	Berenice	Davidson	3501 Civic Center Drive, Rm. 304	San Rafael	CA	94903
D Marin County Dept	Marin Co. Sheriff's Department/OES			3501 Civic Center Dr., #145	San Rafael	CA	94903
D Marin County Dept	Marin County Administrator	Matthew	Hymel	3501 Civic Center Drive, Rm 325	San Rafael	CA	94903
D Marin County Library	Marin Co. Library, Civic Center			3501 Civic Center Dr., Rm. 427	San Rafael	CA	94903
E Environmental Grp	Marin Audubon Society	Barbara	Salzman	48 Ardmore Road	Larkspur	CA	94939
E Environmental Grp	Gallinas Watershed Council	Judy	Schriebman				
E Environmental Grp	Marin Conservation League	Linda Novy	President	1623A Fifth Avenue	San Rafael	CA	94901
F Media	Marin Independent Journal			4000 Civic Center Drive, Floor 3	San Rafael	CA	94903
F Media	Newspointer			523 4th Street	San Rafael	CA	94901
F Media	Pacific Sun			835 Fourth Street, Ste. B	San Rafael	CA	94915
G Private	San Rafael Airport						
G Private	Residents within 625 ft buffer + entire Zone 7						

Appendix B: Report Preparers

The Supplemental Environmental Review/Subsequent Mitigated Negative Declaration, as well as this response to comments document, were prepared by Sicular Environmental Consulting and Natural Lands Management, under contract to the Marin County Flood Control and Water Conservation District. Report preparers included the following:

Sicular Environmental Consulting

Dan Sicular, Ph.D., Project Manager and Principal Author

Subcontractors to Sicular Environmental Consulting:

Sutro Science

Peter Hudson, PG, CEG, Geology and Soils, Hazards and Hazardous Materials

Justin Taplin, MS, Hydrology and Water Quality

Environmental Science Associates

Brian Pittman, CWB, Biological Resources

Liza Ryan, MS, MPH, Biological Resources

RCH Group

Paul Miller, Managing Principal, Senior Noise Analyst

Dan Jones, Air Quality Analyst

Luis Rosas, Noise Analyst

Achasta Archaeology

Susan Morley, M.A., RPA

Brenna Wheelis, Associate Archaeologist

Document Preparation:

Brian Vahey, Eagle Eye Editing

Linda Uehara, September People Graphic Arts

Resumes of technical analysts follow.

DANIEL T. SICULAR, Ph.D.

Principal, Sicular Environmental Consulting and Natural Lands Management

Dan Sicular is the Principal of Sicular Environmental Consulting and Natural Lands Management, a Bay Area-based firm specializing in CEQA environmental review, sustainable forest management, and habitat restoration. Dan is an experienced CEQA practitioner, having written and managed numerous Environmental Impact Reports and Initial Studies for projects ranging from State permitting programs, to solid waste landfills and mining operations, to urban development projects. In late 2017 and early 2018, Dan served as the Consulting Environmental Planning Manager for the Marin County Community Development Agency, filling in for the regular Environmental Planning Manager while she was on maternity leave. In this position, Dan worked closely with staff from the Marin County Community Development Agency, Public Works Department, and County Counsel's Office, providing oversight and guidance for several CEQA and NEPA environmental reviews. This experience, in addition to completion of several EIRs, Supplemental Environmental Reviews, and Initial Studies for the County, has given Dan an intimate knowledge of Marin County environmental review standards, practices, and procedures.

Positions Held

Current
Principal, Sicular Environmental Consulting and Natural Lands Management (2016-present)

Past
Consulting Environmental Planning Manager, Marin County Community Development Agency (Sept. 2017- March 2018)
Forest Manager, Pacific Forest Trust, San Francisco, CA (2015-2016)
Senior Project Manager, Environmental Science Associates, San Francisco, CA (1994-2015)
Instructor, University of California, Berkeley Extension Environmental Management Program (1991-1994)
Instructor, San Francisco State University Environmental Resources Program (1990-1993)

Education

Ph.D., Geography, University of California, Berkeley (1989)
M.A., Geography, University of California, Berkeley (1984)
B.A., Southeast Asian Studies, University of California, Berkeley (1982)

Relevant Experience

San Geronimo Valley Golf Course Club House Parcel Environmental Constraints Manager (Project Manager). Dan prepared an environmental constraints analysis for Marin County, examining the feasibility of developing a portion of the former San Geronimo Valley Golf Course. Dan and his team focused on major environmental topics, including fisheries and other biological resources, hydrology, geology, hazardous materials, aesthetics, land use and planning, and cultural resources. The final report was completed in September 2021.

San Rafael Rock Quarry Supplemental Environmental Review (Project Manager). Dan assisted Marin County with preparation of a CEQA Supplemental Environmental Review and EIR Addendum for the proposed extension of the reclamation timeline for the San Rafael Rock Quarry. The Addendum was adopted, and the extension granted, by the Board of Supervisors in November 2021. The extension allows for continued mining through at least 2044. Dan previously managed the completion of an EIR for the Quarry (see below). The Supplemental Environmental Review covered the full range of environmental topics.

Dipsea Ranch Land Division Initial Study (*Project Manager*). Under contract to the Marin County Community Development Agency, Dan prepared a CEQA Initial Study for the Dipsea Ranch Land Division Project. The Project consisted of subdivision of an existing 8-acre parcel located on Panoramic Highway on

the southern slope of Mount Tamalpais, to create three lots. A Mitigated Negative Declaration for the Project was adopted by the Planning Commission in April, 2020, and, after appeal, upheld by the Board of Supervisors in October, 2020. The Project garnered intense opposition from neighbors. Dan and his team prepared written responses to the extensive comments submitted during the public review period, and responded, on a very short timeline, to additional comments received during the appeal.

Marin County Department of Public Works/Flood Control and Water Conservation District, Environmental Planning and Coordination Services (*Project Manager*). Dan is assisting the District with coordination and review of environmental review documents for the Ross Valley Watershed Program. These have included the San Anselmo Flood Risk Reduction Final EIR, the Corte Madera Creek Flood Risk Management Project Draft EIS/EIR, and the Corte Madera Creek Flood Risk Management Project Phase 1 EIR.

Gallinas Levee Upgrade Initial Study, Marin County Department of Public Works/Flood Control and Water Conservation District (*Project Manager*). Dan prepared a CEQA Initial Study for the planned raising of the timber reinforced berm atop the Gallinas Levee, which protects the Santa Venetia neighborhood from tidal and riverine flooding of Las Gallinas Creek. The Initial Study was completed in June, 2019 and a Mitigated Negative Declaration was adopted for the project in October, 2019.

Alta Way Extension Initial Study, Marin County. *Project Manager*. Dan prepared a CEQA Initial Study for a proposed grading permit to extend an existing residential street in the Tamalpais Valley to access ten legal lots of record. Working closely with Community Development Agency and Department of Public Works staff, Dan navigated complex technical and planning issues as well as public controversy over the project. The Initial Study concludes that the project would have the potential for significant effects on the environment, and that an EIR should be prepared. The Initial Study was completed in April, 2018.

Marin County Federal Housing Grants Program NEPA Assistance, Marin County Community Development Agency (*Project Manager*) Since 2018, Dan has assisted the Community Development Agency with completion of NEPA reviews for the Federal Housing Grants Program. Grants, which originate with funding from the Department of Housing and Urban Development, are given for new construction and rehabilitation low-income housing. Each grant requires compliance with NEPA through preparation of an environmental review document.

Marin County Emergency Operations Facility EIR, *Project Manager. (ESA)* Dan was ESA's project manager for preparation of an EIR for Marin County's proposed Emergency Operations Facility, which was being considered for location on the County Civic Center campus. Working with staff from the County Administrator's Office and Community Development Agency, Dan and his team examined in detail six potential locations for the facility, including four sites on the Civic Center campus as well as two off-site locations. Of paramount importance in the EIR was a consideration of the compatibility of the Emergency Operations Facility with the 2005 *Marin County Civic Center Master Design Guidelines*, which are intended to ensure that all future development on the Campus is consistent with Frank Lloyd Wright's original Master Plan. The EIR was unusual in conducting an economic analysis and architectural study of the alternative locations. Work was stopped on the EIR just before the Draft was due to be published in April 2011, as the Board of Supervisors began focusing attention on the Marin Commons office complex site, one of the alternatives being examined in the EIR; because this site was an existing office complex, purchasing and repurposing it for the Emergency Operations Facility were exempt from CEQA review.

San Rafael Rock Quarry EIR, **Marin County. *Project Manager (ESA)*.** Working with the Marin County Department of Public Works and Community Development Agency, Dan and his team at ESA managed the preparation an EIR for the San Rafael Rock Quarry's Amended Reclamation Plan and Surface Mining and Quarrying Permit. The quarry, located at Point San Pedro near the City of San Rafael, extracts and processes

rock for use as aggregate, road base, rip-rap, and other products. Operation of the quarry had become a matter of considerable controversy, due to impacts on the residential neighborhood that adjoins the quarry property. Of particular concern to the site's neighbors were blasting, truck traffic, and a degraded view shed. The project included an analysis of potential impacts of planned post-reclamation use of the site, which included cutting a channel between the 400-foot deep main quarry bowl and San Pablo Bay in order to create a lagoon and ship channel. A mixed commercial, residential, and marina development was planned for the site. The Final EIR was certified, and the project approved by the Marin County Board of Supervisors, in 2009.

Redwood Landfill Expansion EIR, Marin County. ***Project Manager (ESA).*** While at ESA, Dan managed the completion of a Subsequent EIR for the proposed expansion of the Redwood Landfill, located near Novato in Marin County. Dan worked closely with County Environmental Health Services and Community Development Agency staff to develop an alternative to the project that refocuses the facility on materials and energy recovery, rather than landfill disposal, and that limits the size of the expansion and daily waste intake to levels commensurate with the County's needs. Ultimately, the County approved the alternative, after certifying the EIR in 2008. Subsequently, Dan worked with the County on preparation of Supplemental Environmental Review leading to an Addendum to the EIR, examining a materials recovery facility and expansion of the existing composting operation.

Other EIRs

While at ESA, Dan managed through to certification the following Environmental Impact Reports (lead agency and date of certification provided; asterisk (*) indicates that the EIR withstood legal challenge):

Cold Creek Compost Facility EIR, Mendocino County (1998)*

Blue Line Transfer Station/Materials Recovery Facility EIR, South San Francisco (1999)

Ostrom Road Landfill Expansion, Yuba County (1999)*

Yolo County Central Landfill EIR, Yolo County (2005)

Redwood Landfill EIR, Marin County (2008)*

Shasta and Scott River Watershed-wide Permitting Programs EIRs, CA Depart. of Fish and Wildlife (2009)

San Rafael Rock Quarry Expansion and Reclamation Plan EIR, Marin County (2009)

San Francisco Bay and Delta Sand Mining EIR, California State Lands Commission (2012)*

Pilarcitos Quarry Expansion and Reclamation Plan EIR, San Mateo County (2012)

Sonoma County Compost Facility EIR, Sonoma County Waste Management Authority (2013)

Landbank Central and Wolfe Campus EIR, City of Sunnyvale (2014)

Roblar Road Quarry Supplemental EIR (as a Subcontractor to ESA), Sonoma County (2019)

Brian Pittman, CWB

Wildlife Program Manager/Sr. Wildlife Biologist

EDUCATION

M.S., Environmental Studies, San Jose State University

B.A., Biology, University of California, Santa Cruz

25 YEARS EXPERIENCE

CERTIFICATIONS/ REGISTRATION

Certified Wildlife Biologist - The Wildlife Society, 2004

California Scientific Collecting Permit ID# 003068

Federal Recovery Permit #TE-027422-6 (fairy shrimp, California tiger salamander, and California red-legged frog)

NMFS Federal Recovery Permit #16506 (coho salmon and steelhead)

FAA-certified Unmanned Aircraft System (UAS) pilot

TRAINING

2017 Salt Marsh Harvest Mouse Workshop (2-day with field I.D. & handling)

CDFW California Aquatic Bioassessment Workshop

Wetland Delineation Training Course, U.S. Army Corps of Engineers

Desert Tortoise Survey Techniques Workshop, Desert Tortoise Council

Brian is a *Certified Wildlife Biologist* with 25 years of practice leading projects with complex regulatory, mitigation, and construction/environmental compliance backgrounds. He is fluent with biological resources characerization and management throughout California and routinely coordinates with scientists, planners, and resource agency staff to identify and resolve issues affecting sensitive or regulated resources. Brian is trained in the permitting procedures and requirements under CEQA, NEPA, the federal and California Endangered Species Act(s), California Fish & Game Code, and federal and California Clean Water Acts. He holds a 10(a) federal Recovery Permit for vernal pool branchiopods, California red-legged frog, and California tiger salamander; and he performs a wide range of focused biological surveys throughout the State. He is also a co-investigator on a federal 10(a) permit for Central California Coast coho salmon and steelhead.

Relevant Experience

City of San José, San José-Santa Clara Regional Water Facility Headworks Improvements and New Headworks Facilities Project, San José, CA. Senior Biologist. Brian was the lead biologist assisting the City with a Golden Eagle Avoidance Plan and a Golden Eagle Take Permit application. Brian directly negotiated permit conditions with the USFWS and CDFW and managed nest monitoring during the nestling and fledgling phases of an active golden eagle nest in the vicinity of the project. The project includes construction of a new Headworks facility as well as various pipeline and existing facility improvements to accommodate operation of the new facility within the existing San José-Santa Clara Regional Wastewater Facility.

Santa Clara Valley Water District, Purified Water Project, Santa Clara County, CA. Senior Biologist. As lead biologist, Brian coordinated closely with field crews who conducted biological reconnaissance surveys, nesting bird surveys, and western burrowing owl surveys in support of the project. Brian was lead reviewer of the biological resources report and will be the senior reviewer of the forthcoming Biological Resources EIR section for the project.

Contra Costa County Flood Control & Water Conservation District, Lower Walnut Creek Channel Restoration Project, Martinez, CA. Senior Biologist. Brian is the Project Director and an agency-designated lead biologist for the Lower Walnut Creek Channel Restoration Project. Construction activities, including vegetation removal and channel excavation will be largely completed in late 2021. Focused monitoring activities, which have been ongoing since April 2021, include daily compliance monitoring for California black rail and salt marsh harvest mouse during the manual removal of coastal salt marsh habitat.

Mill Site Remediation at Site OU-E Permitting and Construction Monitoring Support: Georgia Pacific, Ft. Bragg, CA. *Senior Biologist.* Brian was the senior biologist for a project involving soil remediation work at a former timber mill site. He provided oversight for biological monitoring during project construction. ESA is currently supporting long-term monitoring of mitigation wetlands created at the site.

Brian Pittman, CWB (Continued)

Wildlife Program Manager/Sr. Wildlife Biologist

Contra Costa County Flood Control & Water Conservation District, Lower Walnut Creek Channel Restoration Project, Martinez, CA. Senior Biologist. Brian is the Project Director and an agency-designated lead biologist for the Lower Walnut Creek Channel Restoration Project. Construction activities, including vegetation removal and channel excavation will be largely completed in late 2021. Focused monitoring activities, which have been ongoing since April 2021, include daily compliance monitoring for California black rail and salt marsh harvest mouse during the manual removal of coastal salt marsh habitat.

Mill Site Remediation at Site OU-E Permitting and Construction Monitoring Support: Georgia Pacific, Ft. Bragg, CA. *Senior Biologist.* Brian was the senior biologist for a project involving soil remediation work at a former timber mill site. He provided oversight for biological monitoring during project construction. ESA is currently supporting long-term monitoring of mitigation wetlands created at the site.

Pudding Creek Dam Emergency Repair Permitting: Georgia Pacific, Ft. Bragg, CA. *Lead biologist.* Brian provided senior biological input on permitting documents for the repair of a small dam on Pudding Creek.

North Bay Water Reuse Authority, North Bay Water Reuse Program Phase 2 EIR/EIS, Marin, Sonoma, and Napa Counties, CA. *Biological Resource Task Manager.* Brian led ESA's team of biologists for this combined CEQA/NEPA document evaluating the impacts associated with the implementation of 14 individual water reuse projects seeking funding from the U.S. Bureau of Reclamation's Title XVI program. Brian led the EIS/EIR biological resources analyses and the program-wide Biological Assessment to secure funding under the Title XVI grant program.

Oakland Waterfront Ballpark District EIR, Oakland, CA. *Sr. Biologist*. Brian is the senior biologist assisting in the preparation of an EIR for the Oakland Athletics' new ballpark and mixed-used development at Howard Terminal. Brian has been working collaboratively with the City of Oakland and the development team to characterize potential project impacts to aquatic resources in the Oakland Estuary and develop a strategy to protect nesting peregrine falcon.

California Water Service Company ("Cal Water") Bay Area Stream Assessments, San Mateo County, CA. Brian is the lead biologist for this on-call for which ESA biologists respond to accidental water releases into regional streams. In support of RWQCB reporting requirements, Brian has performed and managed aquatic site reviews in numerous streams on the San Francisco Peninsula to review water quality and the health of aquatic invertebrates and native fish species including steelhead trout. ESA's biological resources on-call emergency response contract with Cal Water remains active in 2021.

B.F. Sisk Dam Safety of Dams EIS/EIR and San Luis Low Point Improvement EIS/EIR, San Benito and Santa Clara Counties. *Senior Biologist.* Working directly with the U.S. Bureau of Reclamation, Brian was the senior biologist of the terrestrial biology chapters for the EIS/EIRs and the USFWS Biological Assessments. He led focused field survey efforts for San Joaquin kit fox and California red-legged frog, among other species. Brian also directed the biological field surveys at Pacheco Reservoir, an alternative to Low Point Improvement Project and was senior author of the associated biological survey report.

BART Laughlin Station Photovoltaic Facility, Biological Resources Assessment, Alameda County. *Sr. Biologist*. Brian performed focused biological surveys of BART's Laughlin property in the City of Livermore and was lead biologist of a biological constraints review to support a proposed solar photovoltaic facility on an 11.5-acre portion of the site. The constraints assessment included a wetland assessment, rare plant survey, and vernal pool fairy shrimp habitat assessment, with a discussion of biotic habitats, special-status species, and sensitive habitats on the site. The report characterized the distribution and potential presence of California tiger salamander, California red-legged frog, burrowing owl, and San Joaquin kit fox on the site and provided recommendations to avoid and minimize impacts to these and other sensitive biological resources.

Liza Ryan

Senior Wildlife Biologist

EDUCATION

MS, Ecology, UC Davis

MPH, Environmental Toxicology, UC Berkeley

BS, Biology, Yale University

14 YEARS' EXPERIENCE

California Scientific Collection Permit #10071

TRAININGS

Rare Pond Species Training and Handling (CTS, CRLF, WPT), 2022

Wetland Delineation 40-Hour Training Course (2019)

Endangered Species Act Section 7 Biological Assessment Workshop, 2012

OSHA 10 Hour Training for Respiratory Hazards, 2012

Qualified Stormwater Practitioner (SWPPP) Training, 2011

AEP Advanced CEQA Workshop, 2011

California Tiger Salamander Identification and Management, 2010

California Red-legged Frog Identification and Management, 2008

NWETC CEQA Workshop, 2007

Liza is a senior wildlife biologist and NEPA/CEQA specialist with expertise in ecology, wildlife biology and toxicology. She has 14 years' experience working with multidisciplinary teams on complex regulatory, mitigation, and planning issues. Her responsibliities have included conducting biological reconnaissance, nesting birds, and special status species surveys, habitat analyses, Section 7 biological assessments, mitigation and monitoring plans, and preparing state and federal permits. She has conducted protocol-level surveys for aquatic and terrestrial special-status species, including Ridgway's rail, Swainson's hawk, California red-legged frog, California tiger salamander, salmonids and vernal pool crustaceans. Liza has also worked as a risk assessor, environmental site inspector and in public outreach and scoping. She is experienced with biological resources analysis, permit compliance, surveying, and monitoring for threatened and endangered species throughout the western United States.

Relevant Experience

Antioch Costco Biological Reconnaissance, Antioch, CA. *Project Manager.* Liza surveyed for biological resources on an undeveloped parcel prior to development and authored the reconnaissance report. Burrowing owl and active dens were found onsite, and the project will proceed with measures to avoid impacts to this species.

Mosquito Source Reduction Biological Assessment, Bay Area, CA. *Project Manager.* Liza coordinated with mosquito abatement districts across the Bay Area to develop approaches for mosquito source reduction that minimized impacts to Ridgway's rail, western snowy plover, and other rare tidal marsh species for the Section 7 BA, that were suitable for future Corps permitting.

Lower Walnut Creek Tidal Marsh Restoration Project, Martinez, CA. *Biologist.* Liza monitored for rails, nesting birds, salt marsh harvest mouse and rare plants during vegetation removal, fence installation, and channel excavation for this large-scale tidal marsh restoration project on Suisun Bay. She also assisted with protocol-level salt marsh harvest mouse trapping in 2021.

Bi Du Haalle Housing, 235 Kelly Road, Cloverdale, CA. *Biologist.* Liza performed a biological resources survey and habitat assessment for a technical report for CEQA, on this tribal site planned for commercial and residential redevelopment. Ephemeral waters, rare plants, and oak woodland communities were among the potential impacts.

Ukiah Riverside Park Regeneration Project, Ukiah, CA. *Biologist*. Liza evaluated biological resource impacts for this multi-stage restoration project in Riverside Park in Ukiah. Aquatic, riparian, woodland and grassland habitats were present and potential effects of restoration were evaluated and mitigation developed for CEQA analysis.

San Rafael Rock Quarry Supplemental Environmental Review, Marin County, CA. *Biologist.* The Quarry required supplemental review of a plan to extend the end date of

mining and reclamation. Liza reviewed existing biological surveys, annual reports, and other information, including recent California red-legged frog sightings, and is preparing the biological resources analysis.

Heartland Hydrogen Project Biological Technical Report and EIR, Fresno County, CA. *Lead Biologist.* Liza surveyed the project site for Swainson's hawk, San Joaquin kit fox, and other sensitive species; wrote the biological technical report for the site; and will write the Biological Resources section for the Environmental Impact Report.

Santa Venetia Timber-Reinforced Berm IS, Marin County, CA. *Lead Biologist.* The project was to install a timber berm along a tidal channel to prevent encroachment of floodwater into homes, and to remove and repair pipes associated with existing pumping stations. Liza surveyed the tidal marsh and upland habitats and wrote the Biological Resources section of the Initial Study in 2019.

UCSF Comprehensive Parnassus Heights Plan EIR, San Francisco, CA. *Biologist.* The project is a 2020 programmatic EIR to expand and modernize the Parnassus campus of UCSF, with some project-level components for the initial phase. Liza reviewed prior EIRs for the campus and available environmental data, and conducted a reconnaissance survey of the campus and adjoining Open Space Reserve in order to write the Biological Resources section. The DEIR is presently undergoing revision.

City of Calistoga Riverside Ponds Relocation Project. Napa County, CA. *Biologist.* The project assessed impacts from construction and reconfiguration of four riverside wastewater treatment ponds and other facility structures in close proximity to the Napa River, the Napa Vine Trail, and the Dunaweal Wastewater Treatment Plant to improve water quality, reduce erosion and protect vital infrastructure. Liza authored the Biological Resources section of the initial study, and the Section 7 biological assessment, and responded to public and agency comments.

San Anselmo Flood Risk Reduction Project EIR, Marin County, CA. *Lead Biologist.* Liza performed reconnaissance surveys of the project sites, including Fairfax and San Anselmo Creeks, for the Marin County Flood Control and Water Conservation District and authored the biological resources section of the Project Environmental Impact Reports. The Project EIR for flood risk reduction was finalized and approved in Fall 2018. Liza also authored the Section 7 Biological Assessment, assisted with 401, 404 and LSA permitting for the sites, and monitored for sensitive species during construction in 2020. Species of interest included western pond turtle, northern spotted owl, nesting birds and roosting bats.

North Bay Water Reuse Authority, Phase II EIR/EIS, Marin, Sonoma, and Napa Counties, CA. *Lead Biologist.* Liza was responsible for the preparation of the Section 7 Biological Assessments to evaluate impacts to terrestrial and marine species. She surveyed all sites for the presence of California red-legged frog, and authored the Biological Resources section of the joint EIR/EIS for the North San Pablo Bay Restoration and Reuse Project Phase II. The project proposes to add pipelines and storage facilities for a regional recycling program to use treated wastewater from the wastewater treatment plants within the North San Pablo Bay area.

San Francisco Public Utilities Commission Ridge Trail Upgrades EIR, San Mateo County, CA. *Biologist.* Liza surveyed the 26-mile Fifield-Cahill Ridge Trail and Skyline Boulevard extension for sensitive biological resources, especially San Francisco garter snake, California red-legged frog, Mission blue butterfly and San Bruno elfin butterfly. She authored the Terrestrial Biological Resources Impacts and Mitigation section for the EIR to evaluate options for upgrading the trails and expanding public access to watershed resources. The process involved site visits and numerous discussions with the Public Utilities Commission and Planning Department.

RCHGROUP
planning & environmental consulting

Paul Miller

Managing Principal, Senior Noise Analyst

Paul is an environmental professional with more than 35 years of experience in providing services and products to government agencies and private sector corporations. His technical areas of expertise include CEQA project management and technical analyses in the areas of air quality, greenhouse gas emissions, noise, integrated waste management, energy, and hazardous materials. With a broad range of environmental skills, he has applied his background since 1986 to CEQA and NEPA and has been integral in the preparation of over 500 CEQA/NEPA environmental documents, including project manager for more than 18 major EIRs. He has been the project manager or a key team leader for five state agencies (California Public Utilities Commission (CPUC), California Energy Commission (CEC), CalRecycle, the former California Integrated Waste Management Board, and the State Water Resources Board, Central Valley Region) on projects of statewide importance.

Paul has been collecting and analyzing ambient noise measurements since 1987 for CEQA projects throughout California, including projects in more than 10 California Counties and projects for the California Public Utilities Commission and the California Energy Commission. Through these efforts he has designed efficient noise monitoring systems (hardware and software) to collect cost-effective, long-term noise measurements. He was the senior air quality and noise reviewer for CEQA documents at Environmental Science Associates for almost 20 years and has been the Senior Noise Analyst at RCH since 2012.

Projects in Marin County include the recently approved San Rafael Rock Quarry Amended Reclamation Plan EIR Addendum (2021); other include Alta Way Residential, the North Bay Wetland Mitigation Bank Project, Santa Venetia Timber-Reinforced Berm Improvements Project, composting at the Redwood Landfill, and Aramburu Island restoration.

Relevant Noise Analysis Experience

Noise Studies (2014 - 2021). Paul has been the lead noise analyst for several environmental documents. He has prepared noise analyses for open space projects in the bay area such as the Marin Municipal District Biodiversity, Fire and Fuels Integrated plan and the Alameda Creek North Levee Improvements Project, the North Bay Wetland Mitigation Bank Project and the Santa Venetia Timber-Reinforced Berm Improvements Project. These have also included several projects in the City of South San Francisco: EIR Addendums for the Centennial Towers projects, peer review of 150 Airport Blvd. multi-family development, and MNDs for projects in the East of 101 area including Blue Line Transfer Station Anaerobic Digester, 127 West Harris Hotel and 550 Gateway Hotel. He has prepared numerous analyses for residential projects in Sacramento and Placer Counties as well as the Cities of Rocklin, Roseville and Folsom. He is senior noise analyst for three transmission line projects throughout California for the California Public Utilities Commission.

Noise Studies (2010 - 2013). Paul was the lead noise analyst for several environmental documents. These included a Mitigated Negative Declaration for changes to the Alameda County Integrated Waste Management Plan (CoIWMP) including an increase of the diversion goal to 75%. He also prepared EIR analyses for the restoration of an area of the Salt River in Humboldt County, and a wetland restoration in southern Yolo County. He prepared analyses for Mitigation Negative Declarations for the restoration Aramburu Island in Marin County, a surface water treatment facility in Lodi, a mixed-use projects in San Jose, a housing development in Antioch, a low-income multi-family project in Solana Beach, and a water force main outfall in Vista. He also prepared a federal Environmental Assessment (EA) noise analysis for improvements on the Yuba River Levee.

Noise Studies (2000-2009). Paul was the lead noise analyst for several environmental documents. These included EIRs for the expansion of the Knife River Company Quarry near Lodi California, and the expansion of Forward Inc. Landfill near Stockton California and housing projects in Placerville and Union City California, EIS and EIR documents for the proposed 1,300 Megawatt Eagle Mountain Pumped Storage Hydroelectric project in Riverside County California near Desert Center, an EIR for a 10-mile transmission line and substation for Turlock Irrigation District, and an EIR for a 5,000 ton-per-day Materials Recovery Facility in Irwindale California. He also prepared Initial Study CEQA analyses for repairs at Parsons Slough near Monterey Bay California. He prepared a peer view of an EIR Noise study for proposed changes at the Delmar Race Track in San Diego County.

Education

1977 Master of Science (Zoology and Entomology)
Colorado State University – Fort Collins, Colorado

1974 BA Zoology, Miami University – Oxford, Ohio

Professional Affiliations

- Member, Association of Environmental Professionals (AEP)
- Board Member, Air and Waste Management Association, Mother Lode Chapter of Golden West Section
- Acoustical Society of America, Associate Member
- Institute of Noise Control Engineering (INCE), Associate Member

25+ Years Consulting Experience

- Environmental Science Associates (ESA)
- North State Resources
- Aspen Environmental Group
- EarthMetrics, Inc.
- Environmental Measurements, Inc.
- Ecology Consultants, Inc.
- Miller Environmental Consultants

RCHGROUP
planning & environmental consulting

Luis Rosas

Noise Technical Associate, Environmental Services

Luis Rosas is an environmental professional with 3 years of experience in providing environmental services and products to government agencies and private sector corporations. Luis works as an environmental associate at RCH and has knowledge of ecology, biology, renewable energy and noise. His work involves technical analysis of noise, preparation and review of CEQA/NEPA environmental documents, and noise monitoring. He has experience conducting short-term and long-term noise monitoring using Metrosonics dB 308 and Larson-Davis SoundTrack LxT-1 sound level meters. His technical experience with noise includes hands-on noise monitoring fieldwork and noise modeling. He has conducted noise measurements throughout California from Marin and Sonoma Counties to San Diego County. He recently conducted the noise analysis for the San Rafael Rock Quarry Amended Reclamation Plan EIR Addendum that was approved in 2021 by Marin County.

Luis was Deputy Project Manager for the City of Corning Heritage RV Park IS/MND and the City of Victorville Mojave Drive Self-Storage IS/MND.

CEQA/NEPA Project Experience:

- **Residential/Commercial/Educational/Industrial Development Projects:** San Rafael Rock Quarry Amended Reclamation Plan EIR Addendum, City of Corning Heritage RV Park Storage Project IS/MND, City of Victorville Mojave Drive Self-Storage IS/MND, City of Victorville Amethyst Road Project, Inglewood Transit Connector EIR, American Canyon SDG Commerce 217 Wine Storage IS/MND, Burlingame 1814/1820 Ogden Drive IS/MND, Marin County Distaff Thistle Eradication Project IS/MND, Lomas Santa Fe Drive Improvements Project, Union City Rental Housing IS/MND, Wildhawk Noise/EMF measurements Project and Yolo County Haykingdom Processing and Storage Improvements IS/MND.

- **Material Recovery Facility/Transfer Station/Landfill Projects:** Irwindale Athens Service Materials Recovery Facility/Transfer Stations EIR, Ukiah Landfill Closure EIR and Sonoma Compost SGO EIR

- **Restoration/Recreational Projects:** North Bay Wetlands Mitigation Project IS/MND

- **CEQA Review Projects:** Baden Station Environmental Consistency Analysis, City of La Canada Flintridge CEQA Analysis, East Bay Regional Park District Concord Hills Regional Park EIR Review,

Education

BS, Environmental Studies, California State
University – Sacramento, CA

Professional Affiliations

Member, Association of Environmental Professionals

RCHGROUP
planning & environmental consulting

Dan Jones

Senior Associate /Air Quality Analyst

Dan Jones is an environmental professional with seven years of experience in providing environmental services and products to government agencies and private sector corporations. Dan's technical areas of expertise include CEQA project management and document preparation and technical analyses in the areas of air quality, greenhouse gases/climate change, health risk assessment, and noise. Dan has been integral in the preparation of over 150 CEQA documents and technical studies supporting such documents. Dan's technical noise experience includes short-term and long-term noise monitoring and noise modeling with the Federal Highway Administration's Roadway Construction Noise Model and Highway Traffic Noise Prediction Model. Dan is proficient in a variety of air emissions models including California Air Pollution Control Officers Association's CalEEMod, California Air Resource Board's EMFAC and OFFROAD, and Sacramento Metropolitan Air Quality Management District's Road Construction Emissions Model.

Dan has worked on dozens of projects in the Bay Area Air Quality Management District including several in Marin County.

CEQA/NEPA Project Experience:

- **Residential/Commercial/Industrial Development Projects:** Colfax Maidu Village Commercial Center IS/MND, City of Sacramento Fruitridge Shopping Center Redevelopment IS/MND, City of Sacramento River Oaks (The Cove) EIR Addendum, Colfax Corporation Yard and RV/Boat Storage IS/MND, Colfax Auburn Street Hotel IS/MND, Colfax Sierra Oaks Estates Residential Development IS/MND, Shasta 10 Noise/AQ/CAP Consistency Analysis, Morgan Knolls Subdivision IS/MND, Rocklin Meadows Subdivision AQ/GHG Analysis, Wildcat Subdivision AQ/GHG Analysis, Winding Creek Subdivision Noise Analysis, Rancho Vista Subdivision AQ Analysis, Riolo Vineyards Specific Plan IS/MND, Nevin Avenue Apartments IS/MND, Calistoga Subdivision Noise/AQ/CAP Consistency Analysis, Residences at Railway AQ/GHG Analysis, Centennial Towers North Tower AQ/GHG/HRA Analysis, 488 Linden Avenue AQ/HRA Analysis, 255 Cypress Avenue AQ/HRA Analysis, Centennial Towers R&D Project AQ/GHG/HRA Analysis, Whitehawk I & Whitehawk II AQ/GHG Analysis, Viri Estates Skilled Nursing Facility IS/MND, Alviso Village AQ/GHG/HRA Analysis, Lakeside Fire Protection District IS/MND, Green Island Road Wine Warehouse AQ/GHG/HRA Analysis, Pruneyard Shopping Center AQ/GHG/HRA Analysis, Richmond Terminal 3 Timber Export Facility IS/MND, 901 Larch Avenue IS/MND, 52 Franklin Avenue IS/MND, UCSF Research Building and Parking Garage Expansion EIR, 150 Airport Blvd IS/MND, Oak Knoll Mixed Use Community Plan EIR, Lincoln Northeast Quad Specific Plan HRA, Oakland T12 Office Tower, Sonora Food Service Building IS/MND, Osgood Heights IS/MND, 550 Gateway Blvd Hotel IS/MND, Justin Vineyards & Winery Permit Application, Sunnyvale Atria on El Camino Real AQ/GHG/HRA Analysis, Quarry Place Mixed Use Development AQ/GHG/Noise Analysis, First and Campbell AQ Analysis, Roseville Junction Crossing Noise Analysis, William Jenkins Health Center Noise Analysis, John Henry High School AQ/Noise Peer Review, Sierra Oaks Estates and Village Oaks IS/MND, The Parkway Apartments IS/MND, Cal Expo Rock & Brews CEQA Categorical Exemption, Solana Beach Skyline Elementary School Reconstruction Peer Review, Folsom Bidwell Pointe CEQA Infill Exemption, Marin County Alta Way IS/MND, Granite Bay Joe Rodgers Subdivision AQ/GHG/Noise Analysis, Monarch Vista Apartments IS/MND, Double S Ranch Subdivision AQ/GHG Analysis, Vista Self Storage IS/ND, San Marin High School Turf Field Categorical Exemption, Novato High School Turf Field Categorical Exemption, San Marin High School Expansion IS/MND, Novato High School Expansion IS/MND, Colfax Sierra Oaks Estates and Village Oaks CEQA Addendum, Bayview Health Risk Assessment, The Oaks Assisted Living CEQA Addendum, Dutton Meadows CEQA Addendum, and Rocklin Tractor Supply Company AQ/GHG Analysis.

- **Energy Projects:** Castor Solar Noise Study, California Public Utilities Commission Fulton-Fitch

Mountain Reconductoring Project, California Public Utilities Commission Central Valley Power Connect 230 kV Project, California Public Utilities Commission Riverside Transmission Reliability Project, San Diego Gas & Electric TL 695, TL 6971 Reconductoring Project and Santa Paula Battery Energy Storage System IS/MND, PG&E Wheeler Ridge Junction Project, Gemini Solar EIS.

- **Waste Management Projects:** Glenn County Solid Waste Conversion Facility EIR, Blue Line Biogenic CNG Facility CEQA Addendum, Recology Vallejo Permit Revisions IS/MND, Valley Springs Recycling Center IS/MND, Irwindale Materials Recovery Facility/Transfer Station EIR, Sierra Waste Transfer Station Permitting, Forward Landfill SEIR, North Richmond Chip & Grind GHG Analysis, San Luis Obispo Anaerobic Digester IS/MND, Fair Deal Recycling Facility IS/MND & Transfer Processing Report, Ukiah Landfill Closure EIR, San Luis Obispo Anaerobic Digester Odor Impact Minimization Plan, Irwindale Materials Recovery Facility/Transfer Station EIR Addendum, and San Luis Obispo Anaerobic Digester Authority to Construct Permit.

- **Water Conveyance Projects:** Buena Outfall Force Main Phase III IS/MND, Oasis Irrigation System Expansion Project EIR, The People's Moss Landing Water Desalination Project EIR, Central Amador Water Project Pioneer Water Rehabilitation Project IS/MND, Cuesta Heights Water Storage and Distribution Improvements Project IS/MND and Christian Valley Park Community Service District Water Storage Tank Project IS/MND.

- **Restoration/Recreational Projects:** Rockville Trails IS/MND, High Plains Shooting Sports Center Noise Analysis, Alameda Creek Levee Improvement IS/MND, Putah Creek Restoration Projects Program EIR, Lower Putah Creek Restoration Project IS/MND, Lake Chabot Campus Modernization IS/MND, Phillips 66 Company Line 200 Release Remediation Project IS/MND, Bay Point Restoration and Public Access IS/MND, University of California Santa Barbara Sea Wall IS/MND and Black Diamond Mines Preserve EIR.

- **Mining Projects:** Olive Pit Mine and Reclamation Project EIR, R&J Aggregate Mines EIR, Olive Pit Mine and Reclamation Project EIR Addendum, and Irwindale Kincaid Pit Remediation and Reclamation Project.

Education

BS, Environmental Policy Analysis and Planning, University of California, Davis, CA

Professional Affiliations

Member, Association of Environmental Professionals

PETER HUDSON PG, CEG

Principal/Senior Geologist

Pete Hudson has more than 30 years of broad-based experience in engineering geology, hydrogeology, environmental, geotechnical and surface water. He is a professional geologist and certified engineering geologist in the state of California and a registered geologist/engineering geologist in the state of Washington. His general responsibilities include providing geological, geotechnical, geophysical and hydrogeological technical support in water quality assessments, water resource and geological studies for planning, permit assistance, environmental impact assessments with emphasis on hydrological and geologic issues, soils investigations and erosion/geomorphic investigations, planning/policy assessments, and mitigation planning and monitoring. Pete has authored numerous geoscience and hydrology-related technical sections under CEQA and NEPA and provides technical input and senior review for completion of work products including EIRs and EISs, and EAs. Pete contributes his technical expertise to resource management plans, reclamation/restoration plans, erosion control plans, draft permits (e.g., NPDES), land development environmental feasibility analyses, and site selection/constraints studies. Pete is a Qualified SWPPP Practitioner (QSP) as required under California's Construction General Permit.

Education and Certifications

BA, Geology, San Francisco State University 1987
Pre-Engineering Coursework. University of San Francisco 1985
Professional Geologist, California (Registration No. 6730)
Certified Engineering Geologist, California (Registration No. 2368)
Qualified SWPPP Practitioner QSP (Certificate No. 21673)

RELEVANT PROJECT EXPERIENCE

Marin County Emergency Operation Facility Program EIR, San Rafael, CA, *Geologic/Geotechnical.* Pete was the senior technical advisor for geology and soil issues. Key concerns on the project were ensuring compliance with SB 1953 and associate seismic design requirements, fairly deep subgrade facilities and potential for structural dewatering, and contamination issues. An additional issue issue of concern was construction in an historic district, and related aesthetic and cultural resources impacts, particularly with regard to the Frank Lloyd Wright Civic Center buildings. The EIR included an extensive examination and comparison of alternative sites for the facility, both on and off the Civic Center campus.

San Rafael Rock Quarry Supplemental EIR, Marin County Public Works Department, Marin, CA. *Geology/Geotechnical*. Marin County conducted supplemental environmental review for the San Rafael Rock Quarry's (SRRQ) proposal to amend its approved Conforming Amended Reclamation Plan; the subject of a 2009 Final Environmental Impact Report (FEIR). The amendment allows SRRQ to extend the date to complete mine reclamation activities by 20 years to 2044. Pete was responsible for analysis of geology, soils, and geotechnical issues, (e.g., slope stability) for the proposed amendment. The analysis considered changes to baseline conditions, new applicable laws and regulations, and Quarry operations that affect reclamation that may have changed since publication of the 2009 FEIR.

San Rafael Rock Quarry Amended Reclamation Plan and Amended Quarry Permit EIR. (2009). *Geologic and Hydrogeologic.* Pete provided senior technical input and oversight for the preparation of the geology/seismicity and hydrology chapters of the EIR. He coordinated and led the technical aspects of the

sampling program developed for fugitive dust emissions and crystalline silica. Main technical issues involved erosion and storm water and post-reclamation conversion to a marina. Pete provided senior review of the DEIR sections and assisted with the response to public and agency comments.

Redwood Landfill Solid Waste Facilities Permit Revision EIR. ***Geology/Geotechnical, Hydrogeology Technical Analyst.*** Pete was involved in this project for 8 years as an analysts and geoscience technical advisor for issues with landfill cover, slope analysis, the Leachate Collection and Recovery System (LCRS) operations analysis and levee stability. This project is located on the Bay mud along the banks of the Petaluma River and thus presents challenging issues for geotechnical stability, groundwater/leachate management, and groundwater quality. As Technical Services Group manager, Pete supported staff hydrologists and geologists during the impact analysis, attended County/Applicant CEQA meetings, and provided senior technical review of EIR technical sections.

Dipsea Ranch Land Division Initial Study. ***Geology/Geotechnical.*** Sutro assisted Sicular Environmental Consultants with a CEQA Initial Study for a proposed land division to subdivide an existing 8.3-acre lot in unincorporated Mill Valley to create 3 single-family residential lots. Pete conducted a peer review of applicant geotechnical studies, verified slope instability assessment, and prepared the geology/seismicity section for the initial study. Analysis also involved review of the onsite sewage disposal analysis prepared for the applicant by an outside consultant. Impact analysis included past action involving the unpermitted grading of a fire road, placement of fill, and installation of a culvert.

Alta Way Extension Initial Study. ***Geology/Geotechnical.*** Sutro assisted Sicular Environmental Consultants with the CEQA Initial Study for this subdivision project off the Panoramic Highway in Mill Valley. Pete conducted a peer review of applicant-provided geotechnical investigation report and prepared a draft of the geology/seismicity chapter of the IS/MND. The primary geologic and geotechnical issues involved foundation placement and grading on slopes composed of sheared and fractured mélange of the Franciscan Complex containing sandstone and siltstone. The project is located in a seismically active area on unstable slopes.

San Geronimo Golf Course Constraints Analysis, Marin County Fire Department, Marin, CA. ***Geology/Geotechnical and Hazardous Materials.*** Marin County is considering locating a new fire station at the southwest corner of the site that was previously the San Geronimo Golf Course. Sutro teamed with Sicular Environmental Consulting to conduct a constraints analysis of the site, analyzing constraints in the areas of geology, surface water hydrology, groundwater hydrology, water quality, and hazardous materials. Pete was responsible for assessing constraints associated with geology, seismicity, soils, geotechnical, paleontology, and special geologic features and hazardous materials. Pete authored the geology and hazardous materials constraints chapters.

Eden/Whistlestop NEPA Review – Parcel 4 Remediation, 999 Third Street, San Rafael, CA. ***Hazardous Materials Analyst*** Pete reviewed relevant documentation and prepared a letter of professional opinion regarding the current onsite subsurface contamination and whether it would preclude Eden/Whistlestop from proceeding with its planned residential use at 999 Third Street (also known as Parcel 4), in San Rafael California. Sutro reviewed several site investigation reports and letters of correspondence from the Department of Toxic Substance Control (DTSC), available through the DTSC Envirostor website.

JUSTIN TAPLIN, MS

Principal/Senior Environmental Scientist

A skilled and effective scientist, technical manager, and strategic thinker, Justin brings more than 15 years of California based consulting experience to the environmental review and compliance process. He applies expertise in the arenas hydrology, water quality, and water resource regulation with a discerning eye to produce comprehensive and defensible environmental assessments and mitigation strategies. He acts as technical manager, senior reviewer, and lead author for large-scale, often contentious, complex program- and project-level Environmental Impact Reports, Environmental Impact Statements, and other documents pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA). As technical manager, he routinely coordinates with engineering and technical sub-consultants with expertise in a variety of fields such as stormwater retention and conveyance, stormwater treatment, hydromodification, coastal hydrology and sea level rise dynamics, and water quality. Prior to co-founding Sutro Science LLC, Justin worked at Environmental Science Associates from 2007 to 2015 as a technical manager contributing to a wide range of development, water supply, energy and infrastructure projects.

Education and Certifications

M.S. Environmental Management. University of San Francisco, California.
B.S. (Hons) Biological Sciences. University of Westminster, UK.

Certified Fisheries Professional (#3146), American Fisheries Society
Advanced CEQA Workshop. AEP, 2015.
CEQA Case Law Updates, Issues, Trends. Sohagi Law Group, 2010.
Stormwater Regulations in CA. NWET, September 2009.
Management of Water in CA. UC Berkeley Extension, 2008.

Relevant Project Experience

34th America's Cup and Cruise Terminal EIR, San Francisco, CA. ***Hydrology and Water Quality.*** Environmental review for two projects was completed through a single EIR: 1) the 34th America's Cup sailing events; and 2) a new Cruise Terminal located along the San Francisco Bay shoreline. The America's Cup Event Authority proposed a variety of temporary coastal and offshore facilities. The Cruise Terminal involved in-water work along the Bay shoreline. Justin managed all tasks related to the hydrologic and water quality impacts analysis for the EIR and was the section lead author. Technical management required coordination of engineering and technical sub-consultants as well as a team of hydrologists and coastal process engineers. Justin evaluated the project components, which posed several unique hydrologic and water quality impacts along the Bay margin. Key issues included use of temporary project facilities, such as wave attenuators, in-water construction impacts, and temporary land use changes.

Dipsea Ranch Land Division IS/MND, Marin County Community Development Agency, Marin, CA. ***Hydrologist.*** Environmental review was conducted for a proposed land division to subdivide an existing 8.3-acre lot in unincorporated Mill Valley to create 3 single-family residential lots with two new on-site sewage disposal systems and a storm water management system that would treat and control runoff and mimic pre-project site hydrology. Justin was responsible for all aspects of hydrology and water quality analysis, including consideration of potential hydromodification impacts within the Redwood Creek watershed and impacts resulting from a past action involving the unpermitted grading of a fire road, placement of fill, and installation of a culvert. Justin supported County staff by providing technical input, including peer review of independent studies submitted by Petitioners, throughout the public comment period, public hearing phase, and following an appeal of the Planning Commission vote to adopt the MND and approve the Project.

JUSTIN TAPLIN, MS

Principal/Senior Environmental Scientist

Alta Way Extension IS/MND, Marin County Public Works Department, Marin, CA. *Hydrologist.* Marin County is conducting environmental review for a grading permit application to allow the extension of Alta Way, an existing residential street in unincorporated Mill Valley. The extension of Alta Way would provide access and utility extensions for six to ten undeveloped legal lots of record. Because approval of the grading permit would allow access to undeveloped lots, the analysis of impacts included the proposed extension of Alta Way and the future development of up to ten lots. Justin was responsible for all aspects of hydrology and water quality analysis for the future development of the ten new residential lots, located on steep slopes within the Coyote Creek watershed. Justin's analysis of impacts considered public scoping comments related to concerns that existing stormwater infrastructure is insufficient to accommodate stormwater from the project and that increased runoff from the site could increase flooding downgradient for roads, creeks, and residential properties.

San Rafael Rock Quarry Supplemental EIR, Marin County Public Works Department, Marin, CA. *Hydrology and Water Quality*. Marin County conducted supplemental environmental review for a proposal by San Rafael Rock Quarry (SRRQ) to amend its approved Conforming Amended Reclamation Plan, which was the subject of a 2009 Final Environmental Impact Report (FEIR). The amendment would allow SRRQ to extend the date to complete mine reclamation activities by 20 years to 2044. Justin was responsible for all aspects of hydrology and water quality analysis for the proposed amendment, including consideration of changes to baseline conditions, new applicable laws and regulations, and Quarry operations that affect reclamation that may have changed since publication of the 2009 FEIR.

San Geronimo Golf Course Constraints Analysis, Marin County Fire Department, Marin, CA. *Hydrology and Water Quality.* Marin County is considering locating a new fire station at the southwest corner of the site that was previously the San Geronimo Golf Course. Sutro teamed with Sicular Environmental Consulting to conduct a constraints analysis of the site, analyzing constraints in the areas of geology, surface water hydrology, groundwater hydrology, water quality, and hazardous materials. Justin was responsible for analyzing all surface water hydrologic and water quality constraints, including potential flooding, changes to stormwater runoff and retention, effects from construction and development on surface water quality, consistency with local and State storm water regulations and requirements, and whether site development could affect San Geronimo Creek.

Vista Grande Drainage Basin Improvement Project EIR/EIS, Daly City, CA. Technical Manager: Hydrology and Water Quality. Justin worked with Daly City and San Francisco Public Utilities to provide CEQA/NEPA documentation, and hydrologic and water quality technical support for a project that proposes to address storm-related residential flooding in the basin while beneficially re-using storm water for management of Lake Merced. Justin designed and implemented water quality investigations (including a water quality sampling program) related to Basin Plan, 303d, and NPDES issues and was lead author and analyst for the hydrology and water quality section of the EIR/EIS. Key issues include stormwater re-use impacts to lake water quality and stratification dynamics, fisheries habitat, coastal erosion impacts from and sea level rise resilience of outfall structures, Operation and management of stormwater treatment wetlands.

Relevant Publications

Roberts, J. W., J. Taplin, E. Zigas. 2017. Disposal of Seawater Desalination Brines and the CEQA/NEPA Process. American Society of Civil Engineers (ASCE): World Environmental and Water Resources Congress, May 1, 2017. Available at: https://ascelibrary.org/doi/abs/10.1061/9780784480632.021

SUSAN MORLEY, M.A., RPA

Principal Investigator

EDUCATION

M.A., Social Science, San Jose State University
1997
B.A. Anthropology, San Jose State University
1994

YEARS OF PROFESSIONAL EXPERIENCE
30

REGISTRATIONS/ CERTIFICATIONS

Register of Professional Archaeologists (2001)
Wetlands Training Institute, Glenwood, N.M., 2001
Sonoma State University Foundation: Internship in Native American Graves Protection and Repatriation Regulations 1999

PROFESSIONAL AFFILIATIONS

Register of Professional Archaeologists
Society for American Archaeology
Society for California Archaeology
Santa Cruz Archaeology Society

VOLUNTEER WORK

Cultural Committee Member, Esselen Tribe of Monterey County

Mrs. Morley is principal archaeologist for Achasta Archaeological Services in Marina, California, and has 30 years of professional experience and advocacy work with California tribes. She is qualified under the Secretary of Interior's Standards for Archaeology and is certified by the Register of Professional Archaeologists. She has conducted CEQA compliant archaeological studies in Monterey, Santa Cruz, Santa Clara, San Mateo, and San Benito Counties since 1993. She is professionally trained as a physical anthropologist and is an expert in the identification and analysis of human remains. She received her master's degree from San Jose State University in 1997. Ms. Morley was an adjunct professor in anthropology at California State University, Monterey Bay's (CSUMB) Social and Behavioral Sciences Department from 2002 to 2016. She was designated the university's Native American Graves Protection and Repatriation Act (NAGPRA) coordinator from 2006 to 2016. While at CSUMB she organized workshops for Monterey County culturally affiliated Tribes designed towards the protection of their ancestral heritage sites. Ms. Morley invited Tribal representatives to university laboratory courses to monitor and teach students working with tribal culturally affiliate materials. She has also designed and coordinated multiple cultural monitor training programs for Tribal involvement on construction projects. Prior to founding her own firm, Ms. Morley was an archaeologist and osteologist for Ohlone Families Consulting, a CRM firm. From 2003-2009 she volunteered as Tribal Administrator and Tribal Archaeologist for Ohlone/Costanoan-Esselen Nation (OCEN). She presently volunteers with the Esselen Tribe of Monterey County.

SELECT PROJECT EXPERIENCE

Moss Landing Native American Burial Recovery, Moss Landing, Monterey County, CA. (2021-Present). Principal Investigator. Burial recovery project for individual impacted during mechanical trenching for utility upgrades for a single-family dwelling located within the boundaries of a known resource, and within Monterey County's high archaeological sensitivity zone. Project responsibilities will include direct coordination with Most Likely Descendent and tribal representatives, developing and implementing a burial recovery program for the project, osteological analysis of the individual and CEQA compliant technical reporting. Client: Esselen Tribe of Monterey County.

Springfield Water System Improvements, Moss Landing, Monterey County, CA. Principal Investigator (2020). Conducted Phase II subsurface testing for domestic water infrastructure project in the vicinity of a known archaeological resource. Project tasks included literature and records search, implementation of a subsurface testing plan, evaluation of bore samples and CEQA compliant technical reporting. Client: Denise Duffy and Associates.

Scenic Drive Burial Identification, Carmel Point, Monterey County, CA. (2019). Retained by developer to identify human remains inadvertently encountered during a small construction project for a single-family dwelling located in Monterey County's high archaeological sensitivity coastal zone. Responsibilities included identifying individual as Native American in origin for the Monterey County Coroner and instructing homeowner and developer on procedural regulations, and consultation with the Resource Management Agency of Monterey County.

Kuchun Archaeological Reconnaissance, Arroyo Seco, Monterey County, CA. (2018) Principal Archaeologist Volunteer. Conducted CEQA compliant Phase I emergency archaeological reconnaissance survey of a 40-acre site impacted by illegal grading within Monterey County's high archaeological sensitivity inland zone. Study conducted in collaboration with Esselen Tribal elders during pedestrian survey of parcels, documented previously unrecorded resources within the graded area and surrounding acreage. Resource locations provided by Tribal elder with ancestral knowledge of the area. Responsibilities included literature and records search, field reconnaissance, and CEQA compliant technical reporting. Client: Tom Little Bear Nason.

Harvest Moon Agricultural Employee Housing Project, Salinas, Monterey County, CA. (2020). Principal Archaeologist. Conducted Phase II subsurface auger testing within a modeled archaeological sensitive zone. Project tasks included literature and records search, development and implementation of an archaeological testing plan, core sample analysis, and CEQA compliant technical reporting.

Smith Ranch Rocky Creek Survey, Big Sur, Monterey County, CA. (2016). Principal Archaeologist. Conducted an emergency archaeological reconnaissance survey after unpermitted trenching activities within Monterey County's high archaeological sensitivity coastal zone. Responsibilities included conducting a literature and records search, conducting field reconnaissance survey to reevaluate two known archaeological resources in the vicinity of the trenching, and CEQA compliant technical reporting.

Carmel Valley Ranch Burial Recovery and Monitoring Program, Carmel Valley, Monterey County, CA. (2010). Principal Investigator, Field Director. Conducted burial recovery program for an individual inadvertently impacted during utility trenching. Responsibilities included the respectful excavation of the individual in direct coordination with the MLD and tribal elders, direct collaboration with project MLD, coordination and scheduling field staff, evaluation and analysis of archaeological features and artifacts, literature and records search, and CEQA compliant technical reporting.

Yuki Kutsuimi Šaatoš Inūxw (Sand Hill Road), Stanford University, Palo Alto, Santa Clara and San Mateo Counties, CA. (1998-2002). **Principal Osteologist**. Directed osteological data recovery of individuals inadvertently impacted by construction related activities within the boundaries of known archaeological resources. Responsibilities included respectful excavation of Muwekma Ohlone ancestral remains in direct coordination with the MLD and tribal elders, osteological analysis of the recovered individuals, archaeological monitoring of ground disturbing activities, and CEQA compliant technical reporting. Work conducted under Ohlone Families Consulting Services.

BRENNA WHEELIS, B.A.

Associate Archaeologist-Project Manager

EDUCATION
B.A.., California State University, Monterey Bay, 2009

San Jose State University, Applied Anthropology Graduate Program 2021-Present

YEARS OF PROFESSIONAL EXPERIENCE
15

PROFESSIONAL AFFILIATIONS
American Anthropological Association
Society for California Archaeology
California Historical Society
California Mission Foundation

VOLUNTEER EXPERIENCE
Cultural Committee Member, Esselen Tribe of Monterey County

Brenna Wheelis has thirteen years of experience with CRM firms and universities on the Monterey Peninsula, Santa Clara and San Francisco Bay Area. As an Associate Archaeologist and Project Manager she works directly with clients to identify project needs and outcomes with an emphasis on the timely completion of project deliverables. Ms. Wheelis is versed in archival research for historic and prehistoric properties and routinely conducts collaborative outreach with Native American tribal representatives. She conducts cultural resource evaluations for environmental review documentation and compliance, directs archaeological surveys, manages phase II testing and phase III data recovery programs, manages the analysis and curation of collections, and authors technical reports. Human and faunal osteology are among her specialties. Ms. Wheelis is versed in CEQA, NEPA, and NHPA Section 106 regulations and meets the Secretary of Interior's Professional Qualification Standard for history.

SELECT PROJECT EXPERIENCE

San Rafael Rock Quarry Supplemental Environmental Impact Report, Marin County, California. (2020-2021). Project Manager. Ms. Wheelis led the archaeological resources assessment for the supplemental environmental impact report of Dutra Minerals permit application for extended mining activities at the San Rafael Rock Quarry in Marin County, California. Responsibilities included budget and staffing management, client coordination, pedestrian survey to re-evaluate previously documented archaeological and built environment resources in the project area, literature and records search, final reporting of the results. Client: Sicular Environmental and Natural Lands Management.

Gallinas Levee Upgrade Project, Marin County Flood Control and Water Conservation District Zone 7, Marin County, California. **(2019)** Project Manager. Ms. Wheelis led the cultural resources assessment for the initial study of the Gallinas Levee Upgrade Project. The Project aimed to increase the level of flood protection to the community of Santa Venetia by raising the existing timber reinforced berm to meet the elevation of 12.5 feet NAVD88. Responsibilities included budget oversight, conducting a 1.5-mile survey of the existing levee and timber berm, determine potential adverse effects of the project, literature and records search and technical reporting. Additional peer review of the Cultural Resources and AB52 Tribal Consultation chapters were also conducted. Client: Sicular Environmental and Natural Lands Management

Kuchun Archaeological Reconnaissance, Arroyo Seco, Monterey County, CA. (2018) Assistant Archaeologist, Volunteer (2018). Conducted CEQA compliant Phase I emergency archaeological reconnaissance survey of a 40-acre site impacted by illegal grading within Monterey County's high archaeological sensitivity inland zone. Assisted Principal Investigator and Esselen Tribal elders during pedestrian survey of parcels, documented previously unrecorded resources within the graded area and surrounding acreage. Resource locations provided by Tribal elder with ancestral knowledge of the area. Client: Tom Little Bear Nason.

2961 Corvin Drive, Santa Clara, Santa Clara County, CA. (2019-2021) Project Manager, Field Director). Residential development conducted within a known archaeological resource. Ms. Wheelis manages the Project's cultural mitigation monitoring and reporting program to ensure CEQA and Lead Agency compliance with the Lawrence Station Area Plan. Project responsibilities include direct coordination with the Project's client, the MLD, and the Native American tribal monitors, and worked with the MLD to develop excavation strategies to reduce impacts to potential buried individuals, and archaeological and tribal resources. Ms. Wheelis assisted the MLD and client in developing a reburial plan for the individual on City of Santa Clara public land. Client: Toll Brothers.

3347 17 Mile Drive, Pebble Beach, Monterey County, California. (2019). Project Manage. Conducted the cultural resources assessment in support of the 3347 17 Mile Drive project. The project involves a creating a separate parcel (Parcel II) and the construction of a single-family dwelling with an attached garage in the vicinity of a known archaeological resource. Responsibilities include a literature and records search, Sacred Lands File inquiry and Native American outreach, pedestrian survey, and technical reporting. The project was completed in Spring 2020. Client: Michael Spanos c/o Anthony Lombardo and Associates, Inc.

Department of Veterans Affairs Palo Alto Health Care System, Palo Alto, California (2018) Project Manage. Ms. Wheelis managed the reporting and artifact curation phase of a two-phase project. Responsibilities included budget oversight, preparing on behalf of the client the final project National Register of Historic Places evaluation and nomination documents for archaeological investigations of CA-SCL-585, stabilizing two artifact collections for curation from two separate data recovery programs for curation, and responding to State Historic Preservation Officer comments. Client: Department of Veterans Affairs Palo Alto.

Alta Way Extension Project, Marin County, California. (2017-2018). Project Manager. Responsibilities included drafting a Cultural Resources Assessment for an Initial Study of a proposed ten parcel land development in Marin County, CA. Project tasks included budget oversight, directing field survey, literature and records search, and Native American Sacred Lands consultation with the Federated Indians of Graton Rancheria. Client: Client: Sicular Environmental and Natural Lands Management.

Transbay Redevelopment Block 8, San Francisco, California. (2016). Project Manager. Responsibilities included the preparation of an Archaeological Resources Report (ARR) on behalf of the Transbay Joint Powers Authority (TJPA), outlining the results of an implemented Archaeological Research Design and Testing Plan (ARDTP) for a mixed-use tower development located in an area with moderate historic and prehistoric sensitivity. Project management components included evaluating the significance of archaeological features, coordinating field staff, laboratory analysis management, budget oversight, and coordination with the client and lead agency. Client: Related California.

Quinley Avenue over Black Rascal Creek Project, Merced County Irrigation District, Atwater, California. (2017) Staff Archaeologist. Responsibilities included pedestrian survey of Quinley Avenue Bridge over Black Rascal Creek, irrigation channels and adjacent roadway shoulders and easements in the Merced County Irrigation District, Atwater, CA. Client: GPA Consulting.