3 Draft EIR Text Revisions

3.1 Introduction

This chapter presents revisions to the Corte Madera Creek Flood Risk Management Project, Phase 1 (project) Draft EIR that was published on February 1, 2021. These revisions include both (1) changes made to text, tables, or figures in response to comments on the Draft EIR as discussed and presented in Chapters 2 and 3, as well as (2) staff-initiated text changes to correct minor inconsistencies, to add minor information or clarification related to the project, and to provide updated information where applicable. None of the revisions or corrections in this chapter substantially change the analysis and conclusions presented in the Draft EIR.

The chapter includes all revisions by reproducing the relevant excerpt of the Draft EIR in the sequential order by the chapter, section, and page that it appears in the document. Preceding each revision is a brief explanation for the text change, either identifying the corresponding response codes, such as Response A1-1, where the issue is discussed in Chapter 2 or 3, or indicating the reason for a staff-initiated change. Deletions in text and tables are shown in strikethrough (~~strikethrough~~) and new text is shown in underline (underline).

3.2 Changes to the Draft EIR

3.2.1 Cover, Table of Contents, Acronyms, Abbreviations, and Glossary

A staff-initiated text change has been made to the List of Table in the Draft EIR Table of Contents (page TOC-iii) as follows:

> Table ES-1 Summary of Scoping Comments and Areas of Potential Controversy……ES-13
>
> Table ES-~~1~~2 Summary of Impacts and Mitigation for the Project……ES-17

3.2.2 Executive Summary

In response to comment A5-1, Section ES.3.1 Significant and Unavoidable Impact in the Draft EIR (page ES-9) has been revised as follows:

> The District would implement Mitigation Measure ~~3.1-2~~ 3.1-3: Large Tree Planting, which requires integrating large box trees into the planting plan and design for Frederick Allen Park.

In response to comment A5-2, Section ES.5 Summary of Alternatives to the Project in the Draft EIR (page ES-11) has been revised as follows:

> Compared to the proposed project, Alternative 1 would reduce short-term impacts on aesthetics, air quality, biological resources, geology and soils, GHG emission, hazardous materials, hydrology and water quality, noise, recreation, transportation and circulation, and utilities. Alternative 1 would avoid the significant and unavoidable impact on visual quality. Alternative 1 would result in less long-term benefits to aesthetics, biological resources, geology and soils, hydrology and water quality, and recreation than the proposed project and provide less long-term GHG emission reduction benefits compared to the proposed project because Alternative 1 would involve less planting and natural stream processes that provide long-term GHG reductions through carbon sequestration. Alternative 1 would meet all feasibility criteria and would meet most project objectives.
>
> Compared to the proposed project, Alternative 2 would result in reduced operational impacts and increased long-term benefits on biological resources, hydrology and water quality, hazards, recreation, and transportation and circulation. Compared to the proposed project, Alternative 2 would result in a minor long-term net benefit for GHG emissions. Alternative 2 would meet all feasibility criteria and all project objectives.

In response to comment A5-2, Section ES.5 Summary of Alternatives to the Project in the Draft EIR (page ES-12) has been revised as follows:

> Compared to the proposed project, Alternative 3 would result in a slight reduction in long-term aesthetic, biological, and hydrology and water quality impacts than the proposed project. However, this alternative could result in slightly increased temporary air quality, GHG emissions, and energy impacts during construction due to increased import of materials. Alternative 3 would result in similar long-term GHG emission impacts as the proposed project. Alternative 3 would meet all feasibility criteria and all project objectives.

A staff-initiated text change has been made to Table ES-1 in the Draft EIR (page ES-17) as follows:

Table ES-~~1~~2 Summary of Impacts and Mitigation for the Project

In response to comment A5-1, Table ES-2 Summary of Impacts and Mitigation for the Project in the Draft EIR (Page ES-28) has been revised as follows:

Impact	Level of Significance Before Mitigation	Mitigation Measures
Impact 3.1-3: The project would substantially degrade the existing visual character or quality of public views of the site and its surroundings	Potentially Significant	**Mitigation Measure 3.1-3: Large Tree Planting**. The District will integrate ~~large box trees~~ 24-inch or 36-inch box trees into the final planting plan and design for Frederick Allen Park, to the extent ecologically appropriate for the proposed species. The Town of Ross will provide the desired size and species of trees to the District. The final planting plan will be provided to the Town of Ross for review and approval ~~comment~~ no less than 90 days prior to landscaping. The District will be responsible for maintaining replacement trees until they become established and for replacing dead trees for a period of no less than 10 years.
Impact 3.4-2: The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	Potentially Significant	**Mitigation Measure 3.4-2: Inadvertent Discoveries of Archaeological Resources.** If evidence of any subsurface archaeological features or deposits are discovered during construction-related earth-moving activities, all ground-disturbing activity in the area of the discovery shall be halted within 50 feet of the find, and the finds shall be protected until they are examined by a qualified archaeologist. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; stone-milling equipment (e.g., mortars, pestles, handstones, milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls and deposits of metal, glass, and/or ceramic refuse. The District shall retain a qualified archaeologist who meets the U.S. Secretary of the Interiors professional qualifications in archaeology to assess the significance of the find and make recommendations for further evaluation and treatment as necessary. A Native American representative from a traditionally and culturally affiliated tribe will be notified and invited to assess the find if the artifacts are of Native American ancestry and determined to be more than an isolated find. If the discovery is in an area below Stadium Way and on lands under the jurisdiction of California State Lands Commission, that agency shall be notified. Any treatments and disposition of any artifacts uncovered under the jurisdiction of the California State Lands Commission must be approved by the California State Lands Commission before the treatment is implemented. If, after evaluation, a resource is considered a historical resource or unique archaeological resource (as defined in CEQA Guidelines Section 15064.5), or a tribal cultural resource (as defined in PRC Section 21074), all preservation options shall be considered as required by CEQA (see CEQA Guidelines Section 15126.4 and PRC 21084.3), including possible capping, data recovery, mapping, or avoidance of the resource. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work in the area may resume, at the direction of the District, upon completion of treatment. An Unanticipated Discoveries Evaluation and Treatment Plan shall be prepared before construction that details the procedures for dealing with unanticipated discoveries, including procedures that would be implemented for discoveries that cannot be protected in place. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results, and distributes this information to the public.
Impact 3.12-3: The project could affect existing recreational opportunities.	Potentially Significant	**Mitigation Measure ~~3.1-2~~ 3.1-3: Large Tree Planting (see Aesthetics and Visual Resources above)** **Mitigation Measure 3.12-3: Temporary Shade Structures.** The District shall coordinate with the Town of Ross to select the type and location for installation of temporary shade structures in Frederick Allen Park. The temporary shade structures shall be located along the edge of the Bike Route 20 multi-use path and at seating areas as needed to provide shade during the vegetation establishment period. The temporary shade structures shall be removed when the tree canopy has sufficiently established to provide afternoon shade of the pathway and as determined through coordination with the Town of Ross. The District will submit a draft plan for the shade structures to the Town of Ross no less than 60 days prior to construction. **Mitigation Measure 3.14-1: Traffic Management (see Transportation and Circulation below)**
Impact 3.13-1: The project could conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	Potentially Significant	**Mitigation: Mitigation Measure 3.13-1: Traffic Management** Prior to initiation of construction, the Project contractor(s) shall use a qualified traffic engineer to prepare a Traffic Management Plan (TMP). The TMP shall be developed on the basis of detailed design plans. The TMP shall be reviewed and approved by the District and agencies with jurisdiction over roadways affected by project construction activities prior to construction. Once approved, the TMP shall be incorporated into the contract documents specification. The TMP shall include, but not necessarily be limited to, the elements listed below: • Develop a detour plan for bicycle and pedestrian traffic that shows the approach to reroute traffic on Bike Route 20 to Poplar/Kent Avenue from the College of Marin Parking lot to Ross Common. • Post temporary Bike Route 20 detour and associated signage that meets all the accessibility requirements stated under the Americans with Disabilities Act and CBC Title 24. • Post signs providing public notice of detours at least ~~14~~ 20 days prior to temporary bike route closure. • Provide flaggers at the tennis courts within Frederick Allen Park to provide safe pedestrian access to the tennis courts. • Control and monitor construction-vehicle movements by enforcing standard construction specifications through periodic on-site inspections.

Impact	Level of Significance Before Mitigation	Mitigation Measures
		• Install traffic-control devices where traffic conditions warrant, as specified in the applicable jurisdiction's standards (e.g., the California Manual on Uniform Traffic Control Devices; Part 6: Temporary Traffic Control); flaggers would be used, when warranted, to control vehicle movements. • Implement a public information program to notify interested parties of the impending construction activities using means such as print media, radio, and/or web-based messages and information. • Comply with roadside safety protocols to reduce the risk of accidents. • Maintain access for emergency vehicles at all times. Provide advance notification to local police, fire, and emergency service providers of the timing, location, and duration of construction activities that could affect the movement of emergency vehicles on area roadways. • Store all equipment and materials in designated contractor staging areas on or adjacent to the worksite in such a manner as to minimize obstruction to traffic.

3.2.3 Chapter 1 Introduction

In response to comments A5-6 and B1-2, Section 1.1.4 Town of Ross in the Draft EIR (page 1-5) has been revised as follows:

> **1.4.4 Town of Ross**
>
> The Town of Ross owns Frederick Allen Park. The District would ~~will~~ need to obtain Town of Ross approval of an easement for construction and maintenance of project elements on Town property. The District would ~~will~~ enter into a maintenance agreement with the Town regarding maintenance of project elements within Frederick Allen Park. The Town is a responsible agency under CEQA in the review of project elements within Town jurisdiction. The proposed project would require the Town's Design Review approval and an easement for construction and long-term management of the constructed habitats. In addition, a Town of Ross tree removal permit ~~is~~ would be required prior to removing trees within the Town of Ross.

3.2.4 Chapter 2 Project Description

In response to comment B1-26, page 2-1 in the Draft EIR has been revised as follows:

> San Anselmo Creek and Ross Creek merge to form Corte Madera Creek west of the Lagunitas Road Bridge ~~flows into Corte Madera Creek west of Greenbrae at the confluence with Ross Creek.~~

In response to comment A5-8, Figures 2.5-1 to 2.5-3 in the Draft EIR (pages 2-9 to 2-11) have been revised as follows to show the existing concrete channel walls on both sides of the channel:

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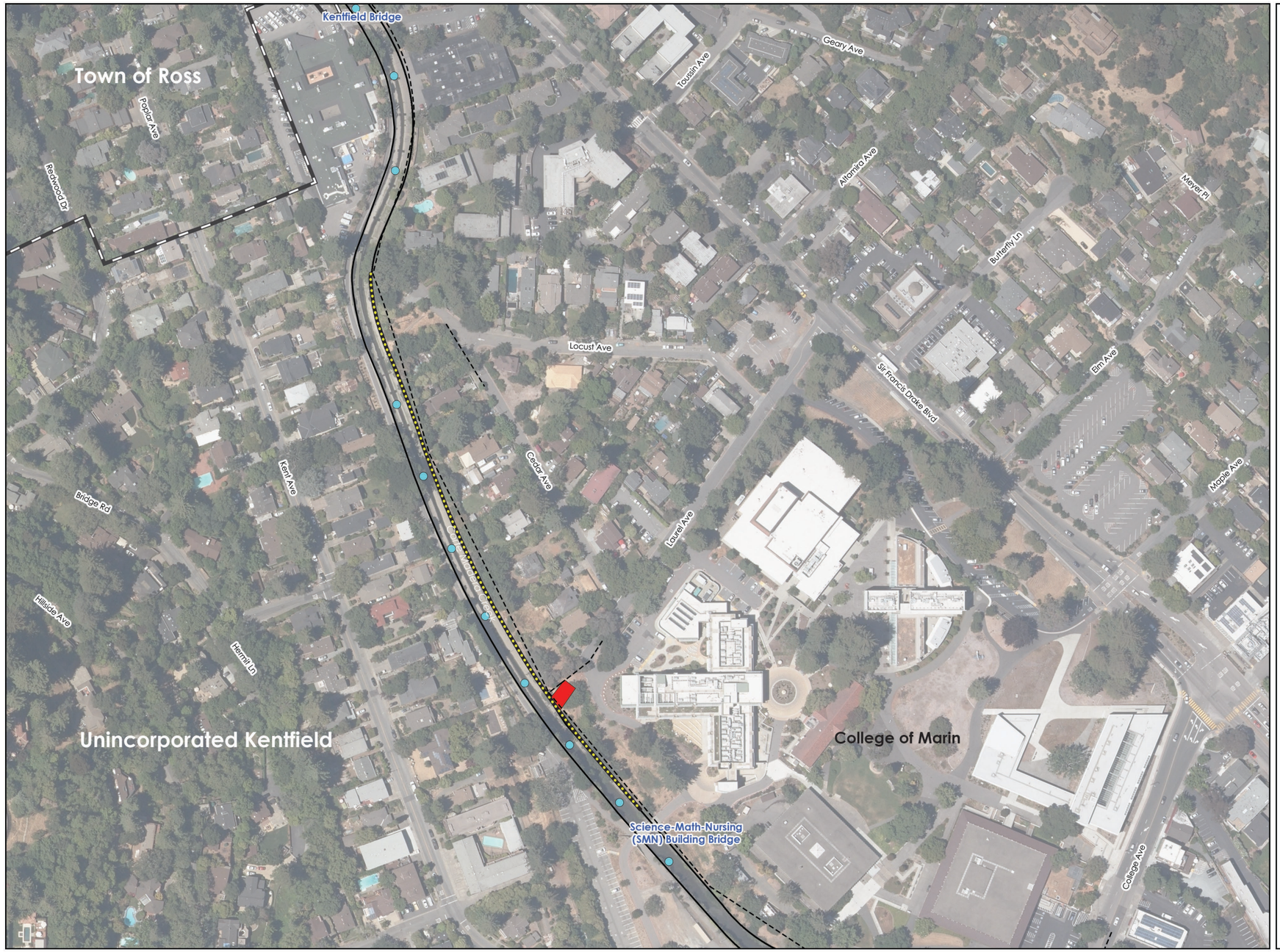
Figure 2.5-1 Project Elements (Map 1 of 3)

Figure 2.5-2 Project Elements (Map 2 of 3)



Corte Madera Creek Flood Risk Management Project - Phase 1

Proposed Project Elements

Legend

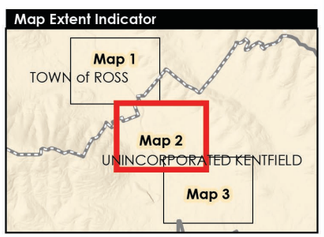
Proposed Project
- New Fish Pool
- Storm Drain Pump Station
- Flood Wall

Existing Facilities
- Concrete Channel Wall
- RVSD Sanitary Sewer Line

Jurisdiction
- Town/County Boundary

Map 2 of 3

Map Extent Indicator



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0 25 50 100 150 200 Feet

Date Created: 9/1/2020

PANORAMA

Figure 2.5-3 Project Elements (Map 3 of 3)

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In response to comment B1-27, page 2-14 in the Draft EIR has been revised as follows:

- **Habitat-enhancing elements.** Creek habitat would be enhanced by replacing the concrete channel with an earthen channel and vegetation downstream from Stadium Way ~~Avenue~~.

In response to comment B1-28, page 2-23 in the Draft EIR has been revised as follows:

Rock and fill energy dissipators, a vegetated bioretention basin, and boulder-lined bioswales would be installed within the newly created ~~channel~~ habitats, including the transition zone.

A vest-pocket park ~~would be created~~ adjacent to the existing multi-use path would be enhanced~~. The upland habitat around the pocket park would be enhanced~~ by planting native ~~understory~~ vegetation ~~beneath the existing trees~~. The two existing trees in the park would be preserved.

In response to comment B1-29, Figure 2.5-8 in the Draft EIR (page 2-25) has been revised, as shown on the following page.

In response to comment B1-3-, Table 2.6-1 Temporary Work Area and permanent Modifications by Element on page 2-26 in the Draft EIR has been revised as follows:

Unit 2	Floodwall (segment #1)	4,750	950	5,700
	Lower College of Marin concrete channel removal	0	80,419~~86,250~~ [a, b]	80,419~~86,250~~

In response to comments B1-25 and B1-31, Figure 2.6-1 in the Draft EIR (page 2-27) has been revised, as shown on the following page.

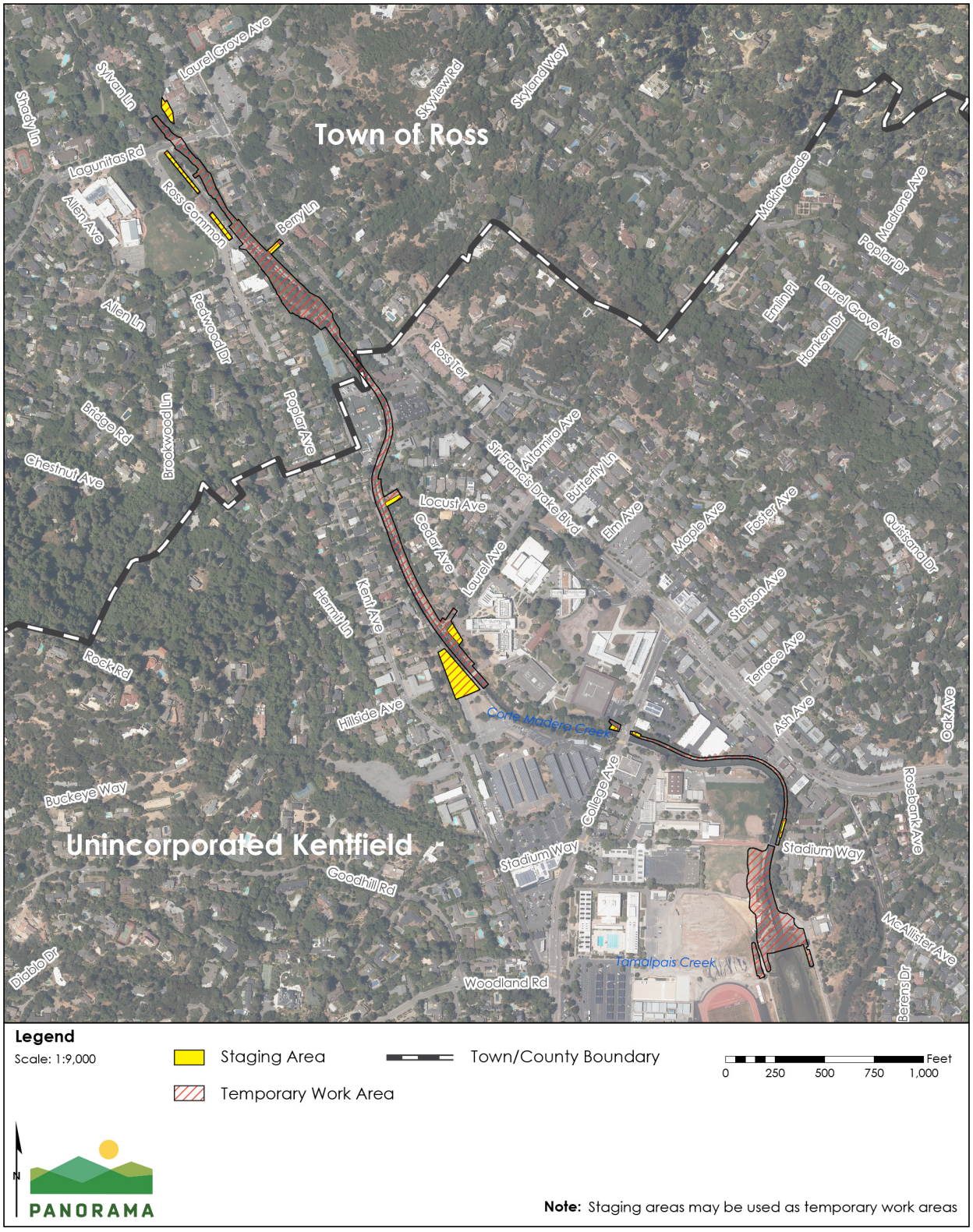
In response to comment A5-9, Section 2.6.4 Grading in the Draft EIR (page 2-34) has been revised as follows:

2.6.4 Grading

Project construction would require grading within the Corte Madera Creek channel and Frederick Allen Park. Areas of channel lowering (Unit 4) and concrete channel removal would be excavated (cut). In addition to earthen fill in some locations, rock placement would be needed for channel stability and to protect utilities. A concrete apron or half-ton rock would be installed where the fish ladder would be removed in Unit 4, to stabilize sediment and soils. Concrete would be used for the short floodwalls, for retaining walls, and to seal the excavated fish pools. Excavation and fill quantities for each project element are identified in Table 2.6-3.

Figure 2.5-8 Lower College of Marin Concrete Channel Removal Habitat Creation

Figure 2.6-1 Staging, Stockpile, and Temporary Work Areas



In response to comment A5-5, Table 2.6-4 Tree Planting List on page 2-37 in the Draft EIR has been revised as follows:

Common Name	Species Name	Size
Frederick Allen Park		
Coast live oak	Quercus agrifolia	36-inch box[a]
Valley oak	*Quercus lobata*	24-inch box[a]
Lower College of Marin Concrete Channel Removal		
Box elder	*Acer negundo*	Treepot 4 [ab]
Buckeye	*Aesculus californicus*	Treepot 4 [ab]
Coast live oak	*Quercus agrifolia*	Treepot 4 [ab]
Valley oak	*Quercus lobata*	Treepot 4 [ab]

[a] A 36-inch box tree would be approximately 10 to 20 feet in height and a 24-inch box tree would be approximately 8 to 15 feet height

[ab] The sizes indicated are minimum size requirements. Treepot 4 is a 4-inch square by 14-inch-deep pot.

In response to comment A5-10, Section 2.7.2 Maintenance in the Draft EIR (page 2-42) has been revised as follows:

2.7.2 Maintenance

Once constructed, the project would require ongoing maintenance activities. Maintenance would be similar to existing District maintenance on Corte Madera Creek; however, the newly constructed habitat would require additional landscape maintenance and vegetation management during the establishment period. Maintenance activities would include the following:

1. Vegetation management
2. Sediment and debris removal
3. Stormwater pump station maintenance
4. Annual floodwall and structure inspection and maintenance

Most maintenance activities would occur during the dry season from April 15 to October 15. The Town of Ross would need to grant an easement to the District for maintenance of project elements on Town property, specifically in Frederick Allen Park. As a part of the easement approval process, the District would enter into a maintenance agreement with the Town of Ross that would specify the District's and Town's responsibilities for maintenance of project elements in Frederick Allen Park.

In response to comment A5-11, Section 2.7.2 in the Draft EIR (page 2-42) has been revised as follows:

Vegetation Management

Vegetation-management activities are employed to achieve three main goals:

1. Maintain channel flow capacity.
2. Reduce fire fuels.
3. Restore creek habitat by removing invasive nonnative plants and revegetating with native plants.

Vegetation management activities would not include ground-disturbing activities. These activities employ vegetation control methods such as cutting and removing invasive vegetation above the ground by hand or with loppers, hand saws, chainsaws, pole saws, weed eaters, and other hand tools. Removal of nonnative vegetation, tree removal, and thinning employ a mix of tools including chainsaws, loppers, hand saws, pole saws, hedge trimmers, and other hand tools. Vegetation management also would include maintenance of replacement trees planted in Frederick Allen Park, including monitoring the establishment of trees after planting.

In response to comment A5-13, Table 2.8-1 in the Draft EIR (page 2-44) has been revised as follows:

Town of Ross	Tree permit Easement and MOU for construction and maintenance within Frederick Allen Park (Town of Ross property) Design review

3.2.5 Chapter 3 Environmental Setting, Impacts, and Mitigation

3.0 Introduction

No revisions were made to this section.

3.1 Aesthetics and Visual Resources

In response to comment A5-14, Section 3.1.3 Aesthetic and Visual Concepts in the Draft EIR (page 3.1-2) has been revised as follows:

3.1.3 Aesthetic and Visual Concepts

Baseline aesthetic conditions are defined within the context of visual quality and visual sensitivity. For the purpose of this EIR, visual quality and visual sensitivity were defined consistent with the Federal Highway Administration (FHWA) Guidelines for the Visual Impact Assessment of Highway Projects (Federal Highway Administration 2015). While the project is not a highway project, the FHWA guidance was used to evaluate overall baseline visual quality in the project area because Marin County has not developed their own guidance for evaluating visual quality and the FHWA guidance was developed to address visual impacts in urban environments, similar to the visual environment of the

proposed project. The Town of Ross's design review criteria and standards (Section 18.41.100 of the Town of Ross Municipal Code) would be addressed during the Town of Ross design review process.

In response to comment B1-27, page 3.1-6 in the Draft EIR has been revised as follows:

Lower Unit 3 and Unit 2 within the Kentfield area share similar characteristics as upper Unit 3 within the Town of Ross. Unit 3 extends from Kentfield Hospital downstream to just south of Stadium Way ~~Avenue~~. Bike Route 20 continues through Kentfield adjacent to the right bank of the creek, eventually crossing to the left bank at the Stadium Way ~~Avenue~~ Bridge.

In response to comments A5-15 and B1-32, Figure 3.1-5 in the Draft EIR (page 3.1-8) has been updated with the correct photo in the FEIR as follows:

Figure 3.1-5 Photograph 8: View of Upper Unit 3 Fish Pools from Kentfield Hospital Bridge, Looking Southeast

In response to comments A5-16, A5-17, and A5-18, page 3.1-15 in the Draft EIR has been revised to include the following text under Section Town of Ross Municipal Code:

Section 12.24.100. Tree Protection Plan. To protect trees during construction of a project and thereafter, and to maximize the chances of their subsequent survival, a Tree Protection Plan shall be required on sites where Significant or Protected trees may be affected. The Tree Protection Plan shall include a certified arborist's report on existing conditions as well as a plan for tree protection during project construction.

(1) When a Tree Protection Plan is Required. A tree protection plan shall be required as part of the materials submitted with applications for Hillside Lot Permits and Hazard Zone Use Permits.

A Tree Protection Plan may be required for Subdivision Permits, Variances, Demolition Permits, Design Review, or Grading and/or Building Permit reviews at the discretion of the Public Works Director or Town Council, as applicable.

Chapter 18.41, Design Review

Purpose (b): This chapter is intended to guide new development to preserve and enhance these special qualities of Ross and to sustain the beauty of the town's environment.

Section 18.41.100 Design Review Criteria and Standards.
(a) Preservation of Natural Areas and Existing Site Conditions.

(1) The existing landscape should be preserved in its natural state by keeping the removal of trees, vegetation, rocks and soil to a minimum. Development should minimize the amount of native vegetation clearing, grading, cutting and filling and maximize the retention and preservation of natural elevations, ridgelands and natural features, including lands too steep for development, geologically unstable areas, wooded canyons, areas containing significant native flora and fauna, rock outcroppings, view sites, watersheds and watercourses, considering zones of defensible space appropriate to prevent the spread of fire.

(2) Sites should be kept in harmony with the general appearance of neighboring landscape. All disturbed areas should be finished to a natural-appearing configuration and planted or seeded to prevent erosion.

(d) Materials and Colors.

(2) Natural materials such as wood and stone are preferred, and manufactured materials such as concrete, stucco or metal should be used in moderation to avoid visual conflicts with the natural setting of the structure.

(3) Soft and muted colors in the earth-tone and wood-tone range are preferred and generally should predominate.

(g) Fences and Screening.

Fences and walls should be designed and located to be architecturally compatible with the design of the building. They should be aesthetically attractive and not create a "walled-in" feeling or a harsh, solid expanse when viewed from adjacent vantage points. Front yard fences and walls should be set back sufficient distance from the property line to allow for installation of a landscape buffer to soften the visual appearance. Transparent front yard fences and gates over four feet tall may be permitted if the design and landscaping is compatible and consistent with the design, height and character of fences and landscaping in the neighborhood. Front yard vehicular gates should be transparent to let light and lines of sight through the gate. Solid walls and fences over four feet in height are generally discouraged on property lines adjacent to a right-of-way but may be permitted for properties adjacent to Poplar Avenue and Sir Francis Drake Boulevard based on the quality of the design, materials, and landscaping proposed. Driveway gates should be automatic to encourage use of onsite parking.

Pedestrian gates are encouraged for safety, egress, and to encourage multi-modal transportation and pedestrian-friendly neighborhood character.

(h) Views.

Views of the hills and ridgelines from public streets and parks should be preserved where possible through appropriate siting of improvements and through selection of an appropriate building design including height, architectural style, roof pitch and number of stories.

(i) Natural Environment.

(1) The high-quality and fragile natural environment should be preserved and maintained through protecting scenic resources (ridgelands, hillsides, trees and tree groves), vegetation and wildlife habitat, creeks, drainageways threatened and endangered species habitat, open space and areas necessary to protect community health and safety.

(j) Landscaping.

(1) Attractive, fire-resistant, native species are preferred. Landscaping should be integrated into the architectural scheme to accent and enhance the appearance of the development. Trees on the site, along public or private streets and within twenty feet of common property lines, should be protected and preserved in site planning. Replacement trees should be provided for trees removed or affected by development. Native trees should be replaced with the same or similar species. Landscaping should include planting of additional street trees as necessary.

(2) Landscaping should include appropriate plantings to soften or screen the appearance of structures as seen from off-site locations and to screen architectural and mechanical elements such as foundations, retaining walls, condensers and transformers.

(3) Landscape plans should include appropriate plantings to repair, reseed and/or replant disturbed areas to prevent erosion.

(4) Landscape plans should create and maintain defensible spaces around buildings and structures as appropriate to prevent the spread of wildfire.

(5) Wherever possible, residential development should be designed to preserve, protect and restore native site vegetation and habitat. In addition, where possible and appropriate, invasive vegetation should be removed.

The following text has been added to page 3.1-15 under Town of Ross General Plan in the Draft EIR.

> **3.2. Landscape Design.** Where appropriate, encourage landscape designs that incorporate existing native vegetation, enhance the cohesiveness of the Town's lush, organic landscape and integrate new planting with existing site features.

In response to comments A5-16, A5-17, and A5-18, Impact 3.1-2 in the Draft EIR (pages 3.1-20 and 3.1-21) has been revised as follows:

> **Town of Ross General Plan**
>
> As discussed above under Goal 1, the proposed project would involve native riparian vegetation planting within Unit 4 and Upper Unit 3 (Frederick Allen Park), which would improve the existing riparian habitat adjacent to the creek. The proposed project would involve native tree planting in the park, including willows along the channel. The proposed project would be consistent with Policy 3.2 because landscaping would include planting native vegetation that would enhance the existing environment and have a beneficial impact on riparian habitat.
>
> **Town of Ross Municipal Code**
>
> Chapter 12.24 of the Municipal Code provides ratios for replacing trees that have been removed and requirements for a Tree Protection Plan. The project would adhere to the mitigation ratios and tree replacement standards in the Town of Ross Municipal Code, and the District would obtain a tree removal permit from the Town of Ross to ensure there would be no conflict. The District would prepare a Tree Protection Plan as part of the Design Review process. The Tree Protection Plan would include a certified arborist's report on the existing trees in the project area that could be affected by project construction and a plan for protecting existing trees during construction. Because the District would provide tree planting and replacement at the ratio required by the Town of Ross, ~~and~~ obtain a Tree Removal Permit ~~tree removal permit~~ from the Town of Ross, and prepare a Tree Protection Plan, the impact from conflict with Town of Ross Municipal Code would be less than significant.
>
> Section 18.41.100 of the Municipal Code provides guidelines for development in the Town of Ross. The Town of Ross would be responsible for verifying that the proposed project complies with the Town's Design Review guidelines through the Design Review process. The following analysis is presented for informational purposes only and does not replace the Town of Ross's independent Design Review.
>
> The proposed project would involve removal of trees and vegetation to construct a new riparian floodplain and natural creek channel. As discussed previously, the proposed project would adhere to mitigation ratios and tree replacement standards in the Town of Ross's Municipal Code and would involve planting riparian vegetation, to enhance habitat along the creek. Disturbed areas would be revegetated and planted with new trees, to maintain and enhance the landscape habitat along the creek. The proposed

project also would remove the concrete walls within the creek channel and replace the concrete channel with a natural creek channel, which would be consistent with Section 18.41.100(a) of the Municipal Code. Therefore, the proposed project would comply with Design Review criteria and standards (a), Preservation of Natural Areas and Existing Site Conditions, and no impact would occur.

The concrete retaining wall in Frederick Allen Park would not extend above the ground surface and would be shorter than the existing concrete channel wall. Project landscaping and vegetation would minimize the visual contrast of the retaining wall with the surrounding area. The retaining wall would not conflict with the surrounding natural setting. The new floodwall in Frederick Allen Park would be 2 feet high and also would be screened by landscaping and native vegetation. Because native vegetation would be visible along the expanse of the floodwall, the floodwall would not conflict with the surrounding natural setting. The proposed project would result in a substantial net reduction in concrete in Frederick Allen Park and increase in use of natural materials, compared to existing conditions, and would comply with design review criteria and standards (d) Materials and Colors.

The proposed project would include a split-rail fence in Frederick Allen Park, which would be installed along the top of the channel to prevent encroachment into habitat areas during the vegetation establishment period. The split-rail fence could be removed after the habitat is established. The split-rail fence would not create a solid expanse and would allow light and lines of site through the spaces in the fence. The fence would not conflict with design review criteria and standards (g) Fences and Screening, and no impact would occur.

As described under Impact 3.1-1, the proposed project would not impact scenic vistas or views, including views of hillsides and ridgelines. The proposed project would not conflict with Design Review criteria and standards (h) Views because the project elements would be low-lying and would not block any views of scenic vistas or ridgelines. Thus, no impact would occur.

The proposed project would not impact ridgelands, hillsides, or tree groves. The proposed project would replace the trees removed in Frederick Allen Park, in accordance with the Town of Ross's Municipal Code. The proposed project would include habitat enhancing elements, including riparian vegetation planting in Unit 4 and Upper Unit 3, and concrete channel removal in Upper Unit 3 and lower Unit 2. The proposed project would result in more natural creek conditions and enhanced habitat and would comply with the natural environment guideline (Section 18.41.100[i] of the Municipal Code). Therefore, the proposed project would not conflict with Design Review criteria and standards (i) Natural Environment. No impact would occur.

As discussed above, the proposed project would involve riparian vegetation planting, and trees proposed for removal would be replaced, per the Town of Ross's Municipal

Code. Graded areas in Frederick Allen Park would be revegetated to prevent erosion. After being constructed, the proposed project would require ongoing vegetation management as a part of maintenance activities, which would include removal of invasive nonnative plans and revegetation with native plans. The proposed project would comply with design review criteria and standards (j) Landscaping. No impact would occur.

The proposed project would comply with all applicable Town of Ross design review criteria and standards and there would be no significant impact.

In response to comment A5-21, page 3.1-26 in the Draft EIR has been revised as follows:

After a period of approximately 10 years, a new tree canopy would become established, and the visual character of the park would be similar to the existing conditions where trees shade the pathway and screen views of the surrounding buildings and structures as shown in Figure 3.1-13. After 20 years, the trees would mature and an extensive tree canopy would cover the park, as shown in Figure 3.1-14. The improvements to the park, including tree planting, additional seating, educational signage, and access to the creek would provide views of a natural creek corridor and would provide greater wildlife viewing opportunities due to the wildlife that would be attracted to the area. Under the District's MOU with the Town of Ross for maintenance in Frederick Allen Park, the District would be responsible for maintenance of replacement trees planted in the park, including monitoring establishment of trees after planting. This would ensure that the tree planting is successful, and that the tree canopy is established in the park.

In response to comment B1-15, Figure 3.1-16, KOP 2: Visual Simulation of Pump Station, Unit 3 on page 3.1-34 in the Draft EIR has been revised the show the pump station painted a neutral color as follows:

Figure 3.1-16 KOP 2: Visual Simulation of Pump Station, Unit 3

In response to comment A5-5 and Comment A5-23, the text of Mitigation Measure 3.1-3: Large Tree Planting has been revised as follows:

> **Mitigation Measure 3.1-3: Large Tree Planting**. The District will integrate ~~large box trees~~ 24-inch or 36-inch box trees into the final planting plan and design for Frederick Allen Park, to the extent ecologically appropriate for the proposed species. The Town of Ross will provide the desired size and species of trees to the District. The final planting plan will be provided to the Town of Ross for review and approval ~~comment~~ no less than 90 days prior to landscaping. The District will be responsible for maintaining replacement trees until they become established and for replacing dead trees for a period of no less than 10 years.

3.2 Air Quality

In response to comment B1-33, Figure 3.2-2 in the Draft EIR (page 3.2-12) has been revised, as shown on the following page.

3.3 Biological Resources

In response to comments B1-25 and B1-31, Figure 3.3-3 in the DIER (page 3.3-11) has been revised, as shown on the following page.

Figure 3.2-2 Sensitive Receptors within 1,000 Feet of the Project Area

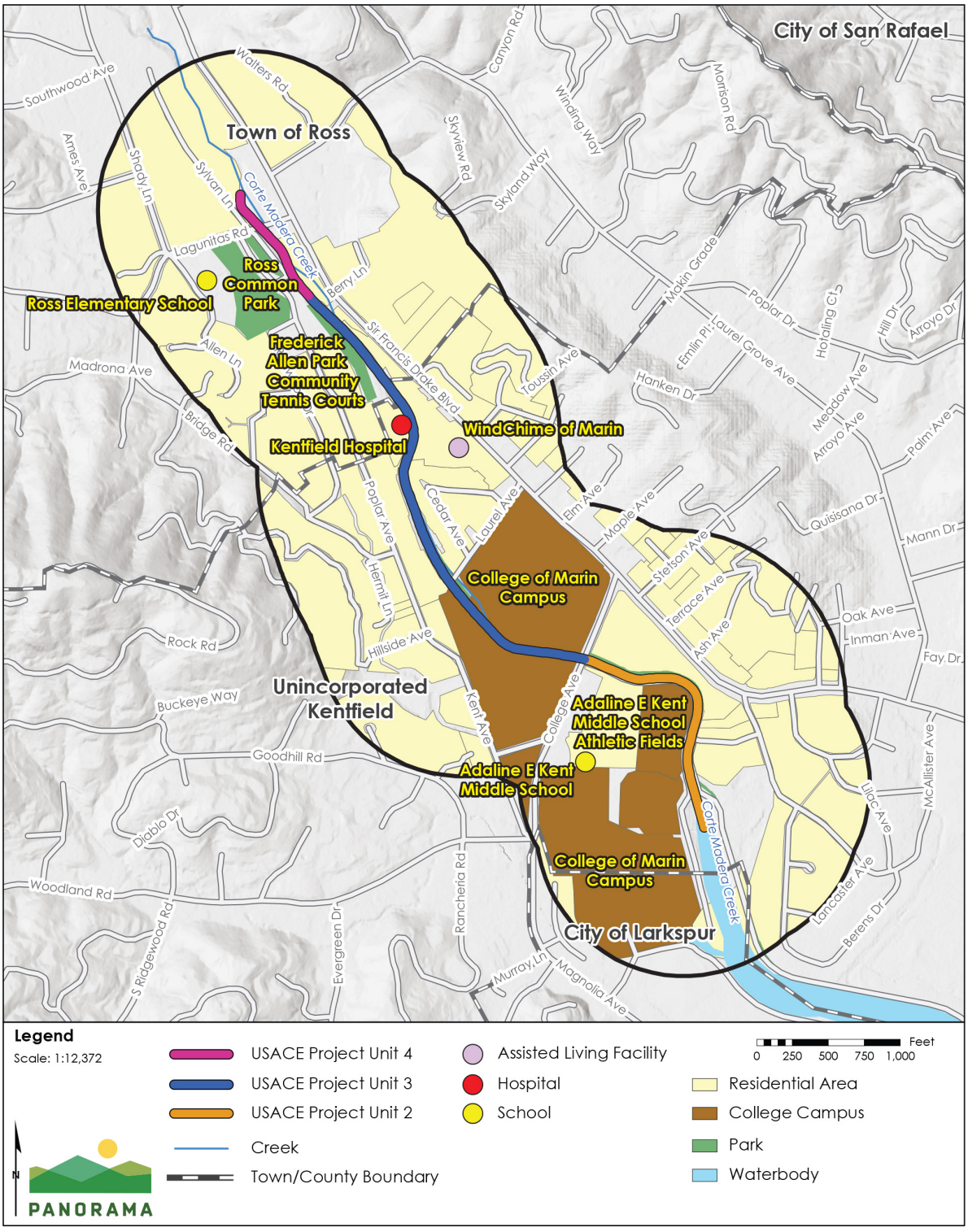


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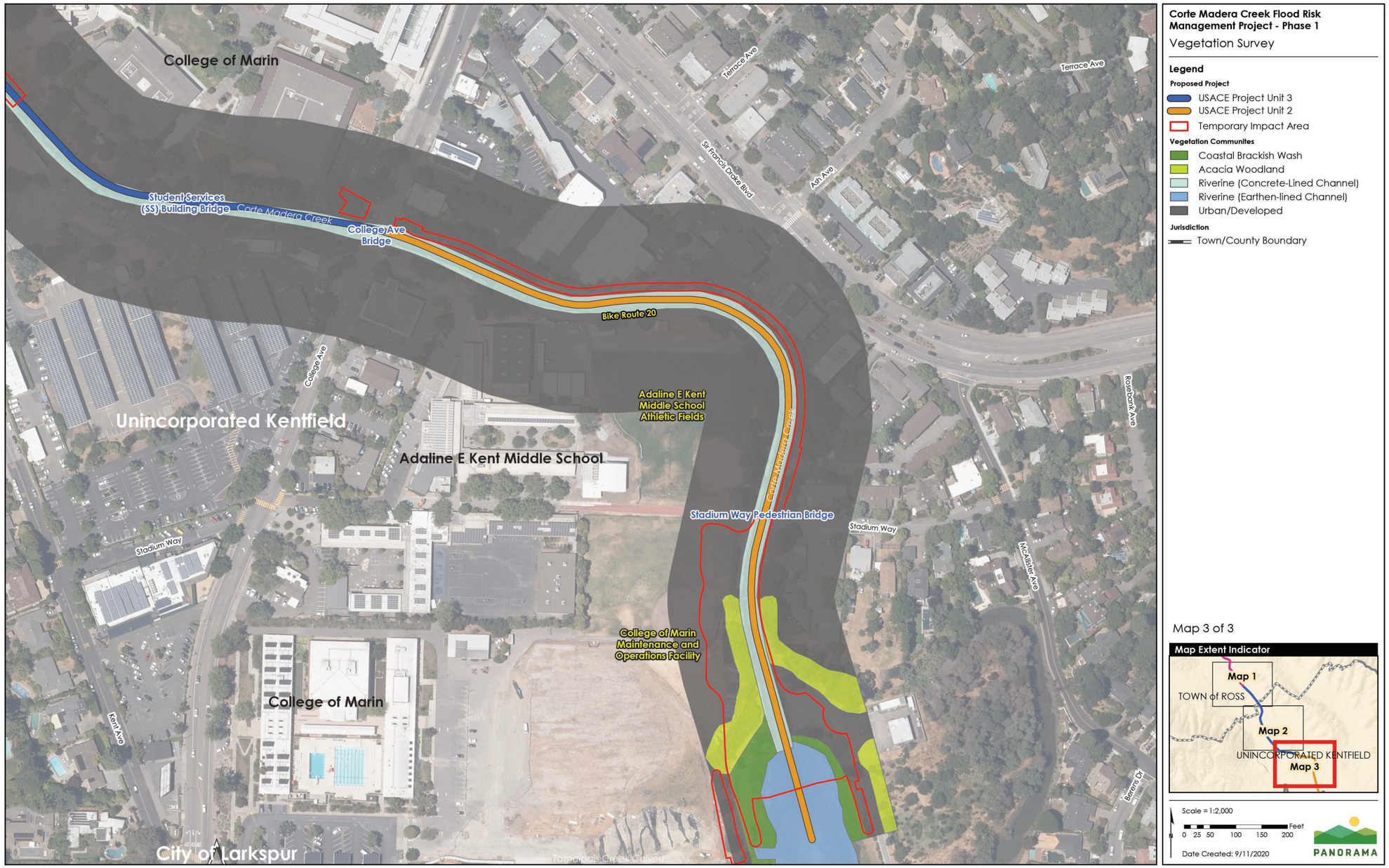
Figure 3.3-3 Habitat Types within Project Area (Map 3 of 3)



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In response to comment B3-8, page 3.3-17 in the Draft EIR has been revised as follows:

> Wildlife Marin Audubon Society ~~Friends of Corte Madera Creek Watershed has~~ conducted ~~Christmas~~ ~~Bird Counts~~ bird counts along Corte Madera Creek from 1978 to 2019~~2003.~~

A staff-initiated text change has been made to page 3.3-36 in the Draft EIR as follows:

> Studies in the Central Valley found that summering populations are substantially more abundant in remnant riparian stands of cottonwood or sycamore greater than 164 feet wide than in younger, less-extensive stands (Pierson, Rainey, & Corben, ~~2000~~ 2006).

In response to comment A5-18, Impact 3.3-5 in the Draft EIR (page 3.3-88) has been revised as follows:

> The District would be required to obtain a tree removal permit from the Town of Ross and provide replacement trees as specified in the Town of Ross Municipal Code. The District would also be required to prepare a Tree Protection Plan as part of the Design Review process. The Tree Protection Plan would include a certified arborist's report on the existing trees in the project area that could be affected by project construction and a plan for protecting existing trees during construction. Because the District would obtain a tree removal permit and prepare a Tree Protection Plan in compliance ~~and comply~~ with the Town of Ross tree protection ordinance, the impact from conflict with Town of Ross ordinance for the protection of biological resources would be less than significant.

A staff-initiated text change has been made to page 3.3-94 in the Draft EIR as follows:

> Pierson, E. D., Rainey, W. E., & Corben, a. C. (~~2000~~ 2006). Distribution and status of red bats, Lasiurus blossevillii in California. Prepared for California Department of Fish and Game, Species Conservation and Recovery Program, Habitat Conservation Planning Branch, Sacramento.

3.4 Cultural Resources

In response to comment A1-2, the text of Mitigation Measure 3.4-2: Inadvertent Discoveries of Archaeological Resources has been revised as follows:

> **Mitigation Measure 3.4-2: Inadvertent Discoveries of Archaeological Resources.**
>
> If evidence of any subsurface archaeological features or deposits are discovered during construction-related earth-moving activities, all ground-disturbing activity in the area of the discovery shall be halted within 50 feet of the find, and the finds shall be protected until they are examined by a qualified archaeologist. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; stone-milling equipment (e.g., mortars, pestles, handstones, milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls and deposits of metal, glass, and/or ceramic refuse. The District shall retain a

qualified archaeologist who meets the U.S. Secretary of the Interiors professional qualifications in archaeology to assess the significance of the find and make recommendations for further evaluation and treatment as necessary. A Native American representative from a traditionally and culturally affiliated tribe will be notified and invited to assess the find if the artifacts are of Native American ancestry and determined to be more than an isolated find. If the discovery is in an area below Stadium Way and on lands under the jurisdiction of California State Lands Commission, that agency shall be notified. Any treatments and disposition of any artifacts uncovered under the jurisdiction of the California State Lands Commission must be approved by the California State Lands Commission before the treatment is implemented.
If, after evaluation, a resource is considered a historical resource or unique archaeological resource (as defined in CEQA Guidelines Section 15064.5), or a tribal cultural resource (as defined in PRC Section 21074), all preservation options shall be considered as required by CEQA (see CEQA Guidelines Section 15126.4 and PRC 21084.3), including possible capping, data recovery, mapping, or avoidance of the resource. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work in the area may resume, at the direction of the District, upon completion of treatment. An Unanticipated Discoveries Evaluation and Treatment Plan shall be prepared before construction that details the procedures for dealing with unanticipated discoveries, including procedures that would be implemented for such discoveries that cannot be protected in place. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results, and distributes this information to the public.

3.5 Energy

No revisions were made to this section.

3.6 Geology and Soils

In response to comment B1-26, page 3.6-2 in the Draft EIR has been revised as follows:

> San Anselmo Creek and Ross Creek merge to form Corte Madera Creek west of the Lagunitas Road Bridge ~~flows into Corte Madera Creek west of Greenbrae at the confluence with Ross Creek.~~

In response to comment A5-24, page 3.6-23 in the Draft EIR has been revised as follows:

> **Operation and Maintenance**
>
> The proposed project would ~~will~~ require removal of trees and vegetation within Frederick Allen Park and within Unit 2 to create natural habitat. The area of tree removal would be replaced with native vegetation including shrubs, grasses, and riparian trees. Revegetation would provide long-term stabilization to avoid substantial soil loss. The area of grading and excavation at the stormwater pump station and the

floodwalls would be permanently stabilized by the project elements that would be installed in the area, including gravel and concrete. Long-term maintenance activities in Frederick Allen Park would be the responsibility of the District, as specified in the maintenance MOU between the Town of Ross and the District.

In response to comment B1-34, page 3.6-25 in the Draft EIR has been revised as followed:

Lower College of Marin

The Bay Mud underlying the Lower College of Marin Project area is weak. The Lower College of Marin Project work involves removal of a portion of the existing concrete channel and riprap, creating a less steeply sloped habitat area and planting the area to establish saltwater marsh and transitional habitat. Riprap would be reinstalled as needed for stability. The reduced slope of the created habitat relative to existing conditions, and use of soil stabilization, including riprap reuse, would generally stabilize the underlying soils. In addition, Marin County Municipal Code requires the Department of Public works to review acceptable soils and geologic reports prior to construction activities located on Bay Mud. ~~Per these regulatory requirements, the geotechnical investigation report for the lower College of Marin concrete channel removal, which is located on Bay Mud, will~~ The Miller Pacific geotechnical report prepared by for the Lower College of Marin Project includes detailed information related to soils matters such as stability, erosion; and settlement, and ~~will~~ includes recommendations for remediating soil instability ~~expansive soils~~, ~~which may includes for example,~~ including removal of these soils and ~~replacement~~ replacing them with ~~engineered~~ imported fill. With adherence to the Marin County Municipal Code, the project would have a less than significant impact due to its location on unstable soil units.

3.7 Greenhouse Gas Emissions

In response to comment A5-25, page 3.7-11 in the Draft EIR has been revised as follows:

- Adopt and implement a policy requiring limitations on idling for commercial vehicles, construction vehicles, buses and other similar vehicles, beyond state law, where feasible.
- Continue to enforce policies and programs that regulate the removal and replacement of significant trees.
- To the extent possible, require new development to be planned around existing trees.
- Support the preservation and creation of conservation areas that provide carbon sequestration benefits, such as those with tree cover.

3.8 Hazards and Hazardous Materials

No revisions were made to this section.

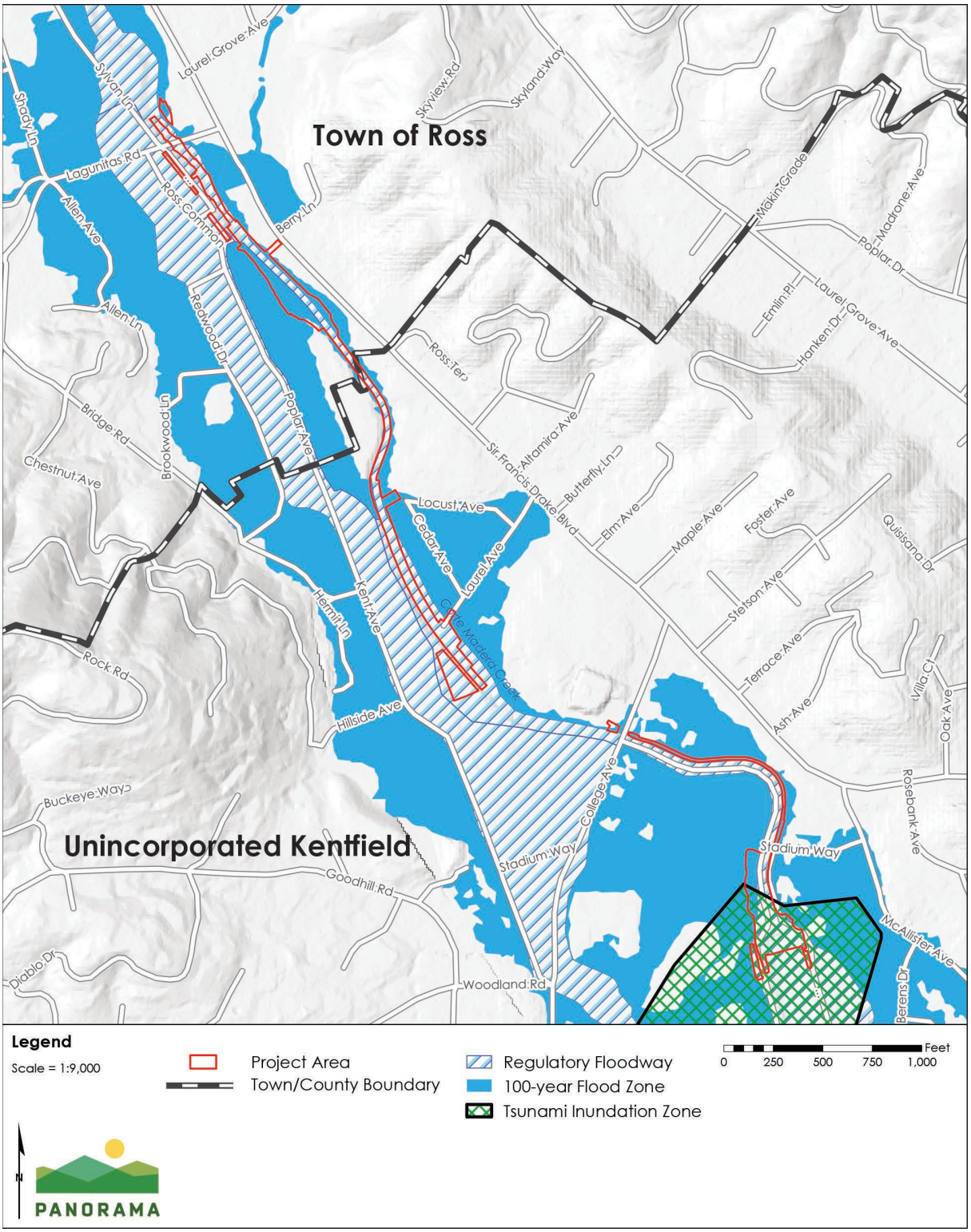
3.9 Hydrology and Water Quality

In response to comment A5-27, page 3.9-16 in the Draft EIR has been revised as follows:

> **Floodway and Tsunami Inundation Zones**
> Given that project construction would involves work in or along the creek channel, the project area at least partially would overlaps the regulatory floodway. A small portion of Unit 2, Lower Corte Madera Creek, is in the Tsunami Inundation Area (California Emergency Management Agency, 2009) (see Figure 3.9-3 below). Any locations where the proposed project would cause an increase in the 100-year base flood elevation within the regulatory floodway would require a Conditional Letter of Map Revision from FEMA.

In response to comments B1-25 and B1-31, Figure 3.9-3 in the DIER (page 3.9-18) has been revised as follows:

Figure 3.9-3 Floodway and Tsunami Inundation Zones



In response to comment B1-37, pages 3.9-21 and 3.9-22 in the Draft EIR have been revised as follows:

> Corte Madera Creek also exhibits high water temperatures. These increased temperatures have been attributed to urbanization of the watershed, specifically the reduction of shaded stream surface area due to loss of riparian vegetation and increased channel width, although less so within Unit 4 (Friends 2008a, in (USACE, 2010)). Increased temperatures also have been attributed to low streamflow, caused by groundwater pumping for irrigation, and lack of infiltration, caused by extensive impermeable surfaces.

In response to comments B1-39 and B1-40, pages 3.9-42 and 3.9-43 in the Draft EIR has been revised as follows:

> ***Unit 2 Lower College of Marin Concrete Channel Removal***
>
> The ~~l~~Lower College of Marin Project ~~concrete channel removal~~ will involve ~~the~~ removal of portions of the concrete-lined flood control channel walls downstream ~~of~~ from Stadium Way to restore natural creek function and create tidal and wetland habitat.
>
> Much of the exposed area will be revegetated with native vegetation; however, re-exposed channel sediments could be mobilized during tidal flows. The Unit 2 concrete channel removal project area is within the tidal influence of the San Francisco Bay. The Central San Francisco Bay is listed on the 303(d) list for mercury, PCBs, furan compounds, dioxin compounds, pesticides, and other contaminants. Sediments that would be excavated and exposed during construction could potentially be contaminated due to existing known contaminants in the San Francisco Bay, and the construction could result in transport of sediments and associated pollutants into San Francisco Bay. The transport of contaminated sediment to San Francisco Bay would be a significant impact. Soil testing was performed on samples from borings in the Lower College of Marin Project's concrete removal area (Geomorph Design Group, 2020). The soil samples were tested for heavy metals (CAM 17 metals), TPH (gas, diesel, and motor oil), semi-volatile organic compounds and PCBs. No hazardous materials were detected in the samples, and the soil contaminants are within the standard background levels for Marin County. ~~The implementation of **Mitigation Measure 3.9-1: Conduct Soil/Sediment Testing**, would ensure that soil and sediment exposed by the project is tested and any contaminated sediments are removed/immobilized.~~
>
> As mentioned in the analysis of the other project elements construction above, compliance with the Construction General Permit and implementations of the SWPPP and associated BMPs would reduce the potential degradation of surface water quality and potential impacts from construction-related spills or leaks. Therefore, with the implementation of the SWPPP~~,~~ and associated BMPs, ~~and Mitigation Measure 3.9-1, construction of~~ the ~~l~~Lower College of Marin concrete channel removal would not violate water quality standards or waste discharge requirements or otherwise substantially

degrade surface or ground water quality. The impact would be less than significant ~~with the application of the prescribed mitigation measure.~~

A staff-initiated text change has been made to page 3.9-47 in the Draft EIR as follows:

Unit 2 Lower College of Marin Concrete Channel Removal ~~***Corte Madera Creek (Phase 2)***~~

In response to comment B1-40, pages 3.9-47 and 3.9-48 in the Draft EIR have been revised as follows:

Following concrete removal, much of the exposed area will be revegetated with native vegetation. However re-exposed channel sediments along the lower banks and streambed could be mobilized during ~~tidal flows or~~ flood events and tidal conditions, possibly building up fine sediment deposition in the reach that could be mobilized during daily tidal cycles, potentially increasing turbidity and transporting associated pollutants into San Francisco Bay. As discussed above, soil sampling in the Lower College of Marin area concluded that the soils are not hazardous, and the proposed project would not expose contaminated soil and sediment. ~~Implementation of Mitigation Measure 3.9-1 would ensure that soil and sediment exposed by the project is tested and any contaminated sediments are removed/immobilized during construction.~~ In addition, site-specific bank protection will be installed in areas determined to be at increased risk of erosion or scour and creation and enhancement of vegetated tidal habitat would minimize the risk of erosion and increased turbidity to a less than significant level. Therefore, ~~with the implementation of Mitigation Measures 3.9-1,~~ operation and maintenance in this element would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The impact would be less than significant ~~with mitigation.~~

A staff-initiated text change has been made to page 3.9-60 and Table 3.9-7 in the Draft EIR as follows:

The number of parcels ~~by area~~ in Ross Valley that would benefit from decreased flooding during a 25-year flood event under existing conditions are summarized in Table 3.9-7 below. The parcels that would benefit from reduced flooding during the 25-year flood event are shown in Figure 3.9-10.

Jurisdiction/Land Use	Number of ~~Structures~~ Parcels with Reduced Flooding				
	Area No Longer Inundated After Project	1 to 4.5 feet reduction in water surface	0.5 to 1 foot reduction in water surface	0.2 to 0.5 foot reduction in water surface	Total

A staff-initiated text change has been made to page 3.9-68 in the Draft EIR as follows:

~~Marin County. (2020b). *Marin County Flood Control and Water Conservation District, Real-Time Rainfall, Creek Stage, and Weather Data*. Retrieved from County of Marin: https://marin.onerain.com/site/?site_id=1555&site=0fc267e5-331e-48fc-8a35-8512b95e4737~~

3.10 Noise

In response to comment B1-33, Figure 3.10-3 in the Draft EIR (page 3.10-10) has been revised as shown on the following page.

A staff-initiated text change has been made to page 3.10-19 in the Draft EIR as follows:

Lower College of Marin ~~Corte Madera Creek~~ Concrete Channel Removal

3.11 Public Services

No revisions were made to this section.

3.12 Recreation

In response to comment B1-43, Figure 3.12-2 in the Draft EIR (page 3.12-4) has been revised, as shown on the following page.

In response to comment B1-44, page 3.12-14 in the Draft EIR has been revised as follows:

Unnamed Paths

The project would require temporary closure of unnamed paths #1~~,~~ and #2~~, and #3~~ during construction of floodwalls and temporary closure of unnamed path #3 during removal of the concrete channel and habitat enhancement in Unit 2.

Figure 3.10-3 Noise Measuring Sites and Sensitive Receptors within 1,000 Feet of the Project Area

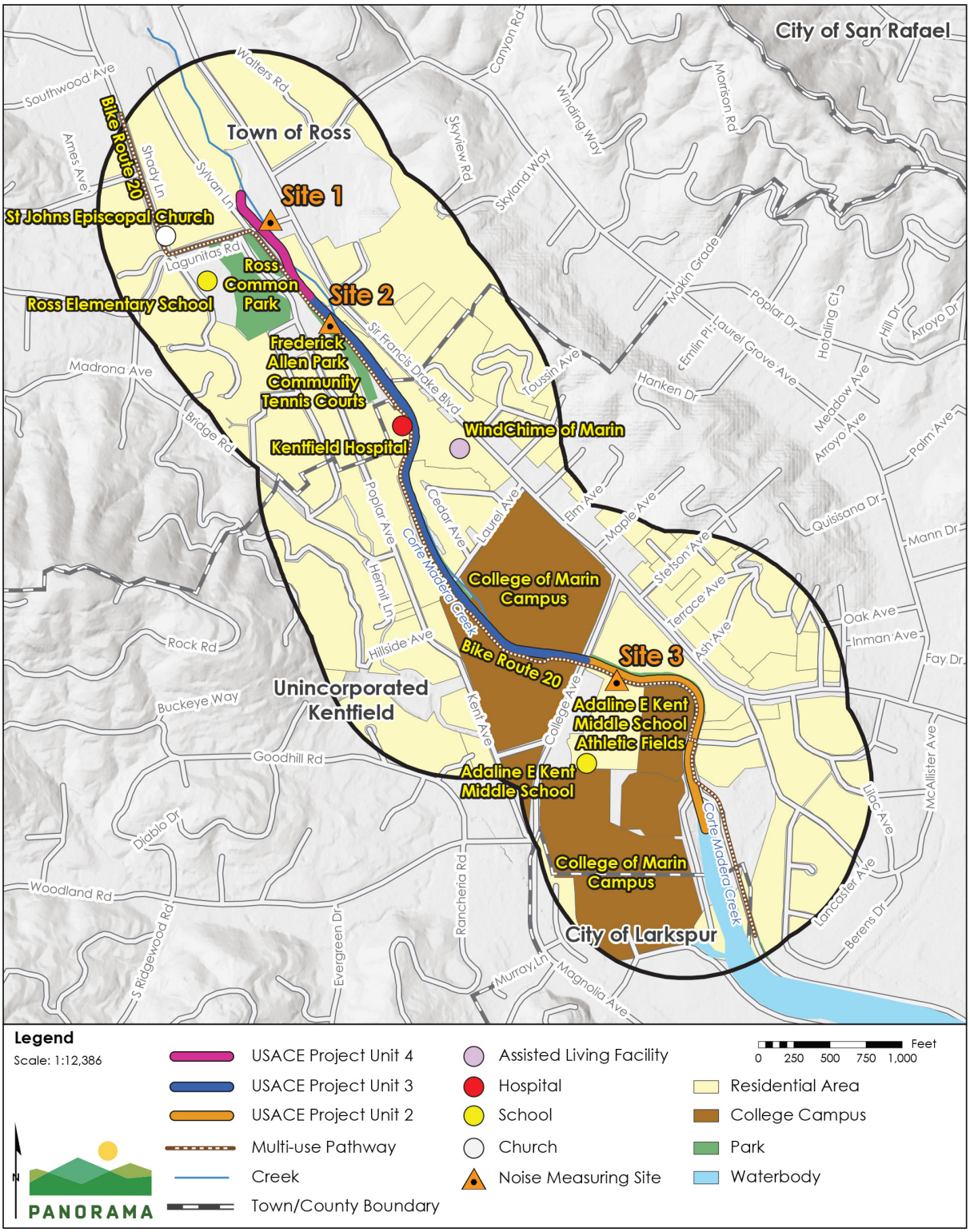
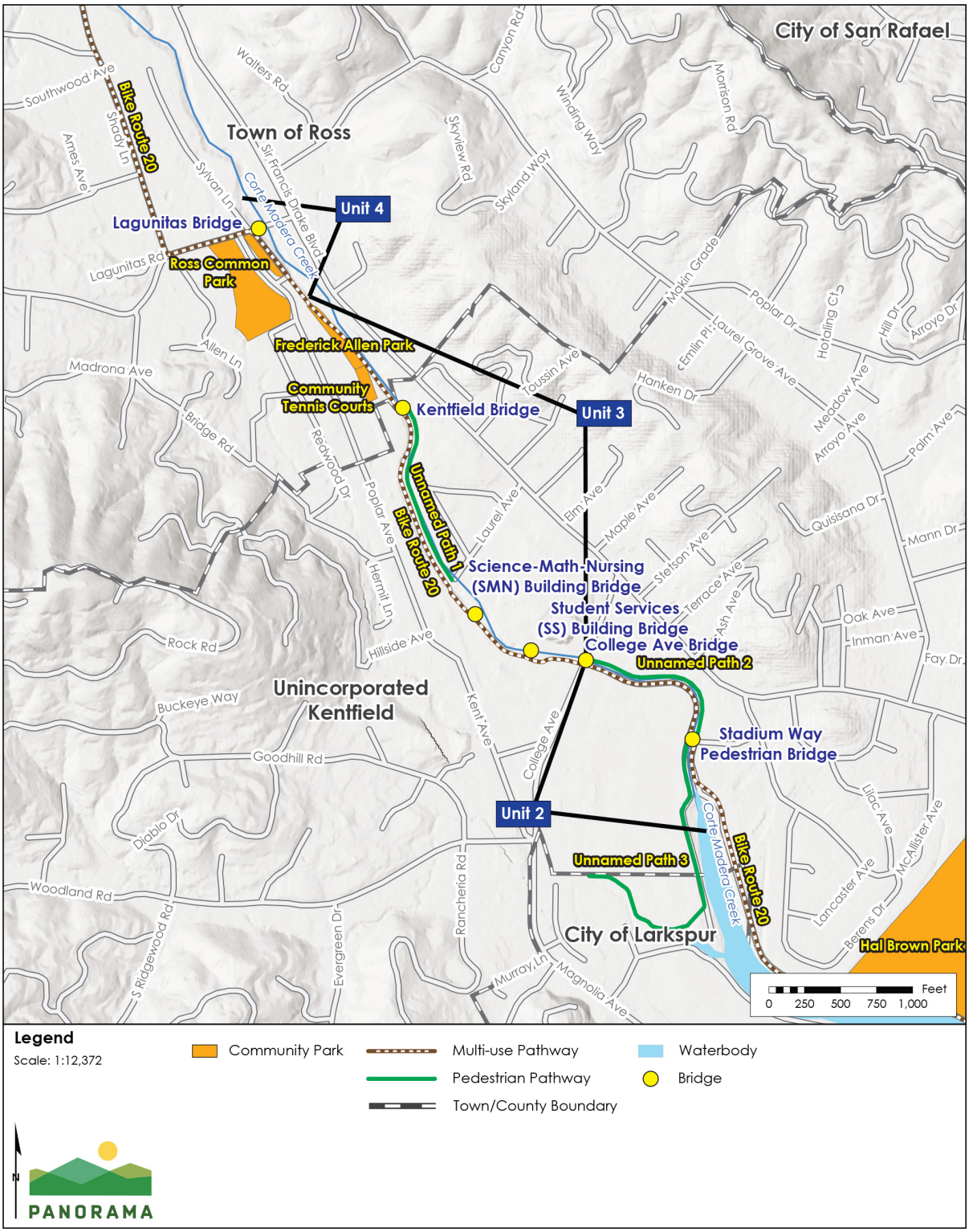


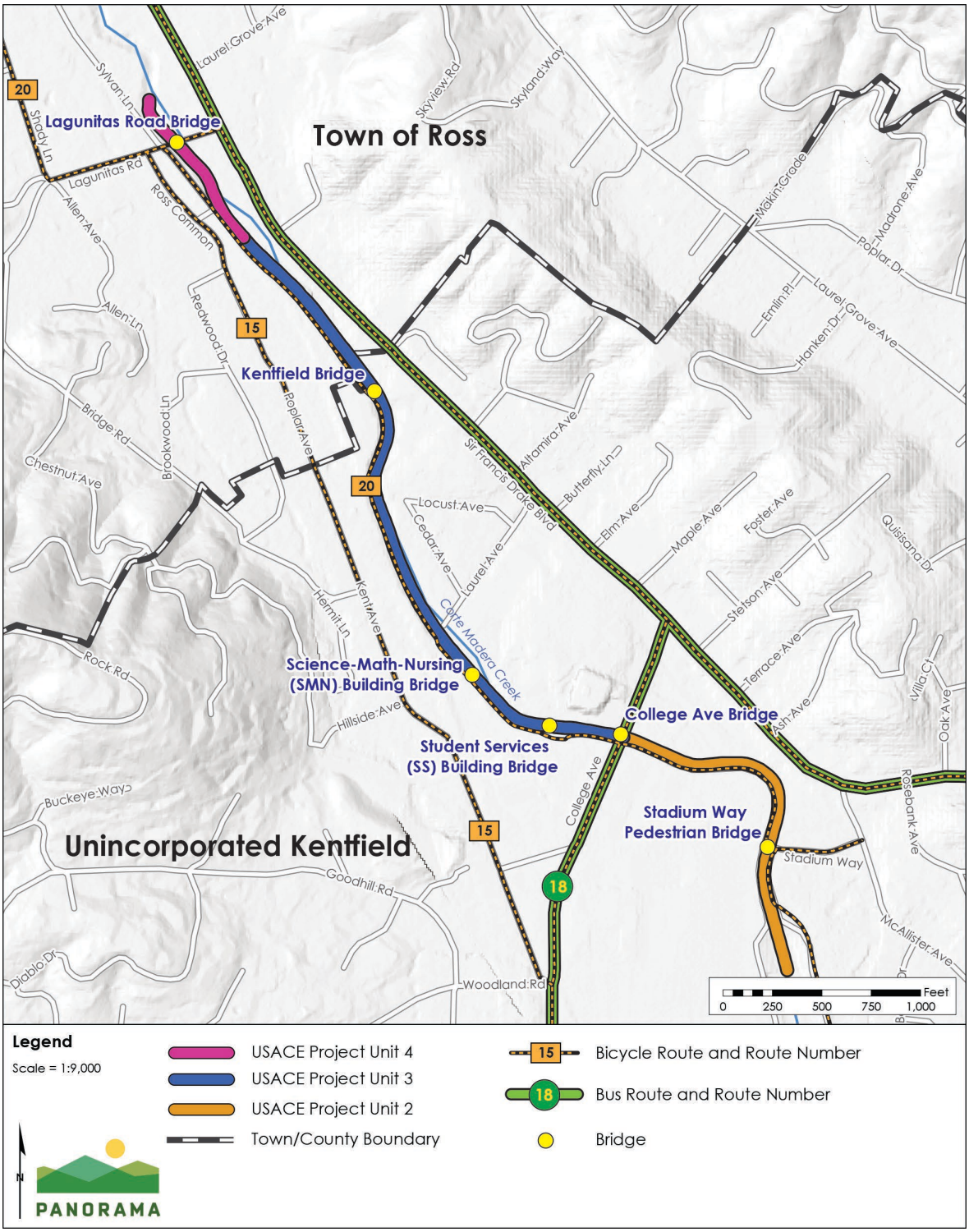
Figure 3.12-2 Parks and Recreational Facilities in the Project Area



3.13 Transportation and Circulation

In response to comment B1-45, Figure 3.13-1 in the Draft EIR (page 3.13-3) has been revised as follows:

Figure 3.13-1 Local Transportation Network



In response to comment B1-46, page 3.13-4 in the Draft EIR has been revised as follows:

> Bike Route 20, a biking and pedestrian pathway, follows ~~the right bank of~~ Corte Madera Creek ~~and runs~~ from the Larkspur Ferry Terminal to the Town of Fairfax (Marin County Bicycle Coalition, 2008). ~~Bike Route 20 is a biking and pedestrian pathway.~~ Downstream from Stadium Way, the bike route follows the left bank of the creek. Moving upstream, the bike route crosses from the left bank to the right bank of the creek at the Stadium Way bridge. The bike route continues along the right bank as an off-street paved multi-use path, across College Avenue, to the beginning of Unit 4. The bike route then transitions to an on-road bike path adjacent to Unit 4. ~~The segment of Bike Route 20 within the project area consists of an off-street paved multi-use pathway adjacent to Corte Madera Creek Units 2 and 3. Bike Route 20 transitions to an on-road bike path adjacent to Unit 4. Bike Route 20 crosses over Corte Madera Creek from the right bank to the left bank at the Stadium Way pedestrian bridge and continues along the left bank as an off-street paved multi-use path to Bon Air Road.~~ Bike Route 20~~, within Units 3 and 2,~~ is heavily trafficked by pedestrians and bicyclists, including commuters.

A staff-initiated text change has been made to page 3.13-6 in the Draft EIR as follows:

> The following traffic-related goals and policies presented in the Marin Countywide Plan are applicable to the project (Marin County Community Development Agency, 2~~015~~ 2007):

In response to comment B1-47, page 3.13-8 in the Draft EIR has been revised as follows:

> Vehicles traveling to the ~~l~~Lower College of Marin ~~concrete channel removal~~ area would travel on ~~Woodland Road~~ College Avenue and into the College of Marin campus at the entrance to parking lot 12. Limited vehicle access would also occur on segments of Bike Route 20 within Unit 3 and on an informal path within the District's easement on the left bank.

In response to comment A3-7, Mitigation Measure 3.13-1: Traffic Management has been revised as follows:

> **Mitigation: Mitigation Measure 3.13-1: Traffic Management**
>
> Prior to initiation of construction, the Project contractor(s) shall use a qualified traffic engineer to prepare a Traffic Management Plan (TMP). The TMP shall be developed on the basis of detailed design plans. The TMP shall be reviewed and approved by the District and agencies with jurisdiction over roadways affected by project construction activities prior to construction. Once approved, the TMP shall be incorporated into the contract documents specification. The TMP shall include, but not necessarily be limited to, the elements listed below:
>
> - Develop a detour plan for bicycle and pedestrian traffic that shows the approach to reroute traffic on Bike Route 20 to Poplar/Kent Avenue from the College of Marin Parking lot to Ross Common.

- The temporary Bike Route 20 detour and associated signage shall meet all accessibility requirements as set forth under the Americans with Disabilities Act and CBC Title 24.
- Post signs providing public notice of detours at least ~~14~~ 20 days prior to temporary bike route closure.
- Provide flaggers at the tennis courts within Frederick Allen Park to provide safe pedestrian access to the tennis courts.
- Control and monitor construction-vehicle movements by enforcing standard construction specifications through periodic on-site inspections.
- Install traffic-control devices where traffic conditions warrant, as specified in the applicable jurisdiction's standards (e.g., the California Manual on Uniform Traffic Control Devices; Part 6: Temporary Traffic Control); flaggers would be used, when warranted, to control vehicle movements.
- Implement a public information program to notify interested parties of the impending construction activities using means such as print media, radio, and/or web-based messages and information.
- Comply with roadside safety protocols to reduce the risk of accidents.
- Maintain access for emergency vehicles at all times. Provide advance notification to local police, fire, and emergency service providers of the timing, location, and duration of construction activities that could affect the movement of emergency vehicles on area roadways.
- Store all equipment and materials in designated contractor staging areas on or adjacent to the worksite in such a manner as to minimize obstruction to traffic.

A staff-initiated text change has been made to page 3.13-16 in the Draft EIR as follows:

> Marin County Community Development Agency. (~~2015~~ 2007). *Marin Countwide Plan: Transportation Element.*

3.14 Tribal Cultural Resources

No revisions were made to this section.

3.15 Utilities and Service Systems

A staff-initiated text change has been made to page 3.15-1 in the Draft EIR as follows:

> **Water Supply**
>
> The Marin Municipal Water District (MMWD) is a public agency that serves approximately 191,300 customers in south and central Marin County. The MMWD provides water to the project area for domestic, commercial, and firefighting use. The MMWD facilities include seven reservoirs, ~~four~~ three water-treatment plants, and various storage tanks, pumps, and distribution mains (MMWD, 2020).

In response to comment B1-48, page 3.15-1 in the Draft EIR has been revised as follows:

> Several stormwater lines and MMWD water ~~and stormwater~~ lines are in the project area. There are water supply and stormwater lines that cross the creek just upstream of Lagunitas Road Bridge in Unit 4. Water pipelines are also adjacent to the southern end of Unit 4 and parallel parts of Bike Route 20. Two stormwater lines are near the proposed storm drain pump station in Unit 3. Smaller stormwater lines are scattered throughout Unit 3 and Unit 2. One water pipeline crosses the creek aboveground at Stadium Way in Unit 2. See Figure 3.15-1 to Figure 3.15-3 for locations of water pipelines in the project area.

In response to comment A4-1, page 3.15-2 in the Draft EIR has been revised as follows:

> RVSD sanitary sewer lines run beneath Corte Madera Creek in a northwest/southeast direction within the project area from the southern end of Unit 4 near the fish ladder to near the end of Unit 2. The sewer lines cross beneath Corte Madera Creek at the approximate location of the fish ladder and at Stadium Way in Unit 2 (refer to Figure 3.15-1 to Figure 3.15-3). The sewer line that crosses Corte Madera Creek at the end of Stadium Way passes beneath the concrete channel in a siphon structure adjacent to the pedestrian bridge. ~~An aboveground sewer pipe crosses the creek on the pedestrian bridge at the end of Stadium Way (Figure 3.15-3).~~

In response to comments B1-25 and B1-51, Figures 3.15-1, 3.15-2, and 3.15-3 in the Draft EIR (pages 3.15-3, 3.15-4, and 3.15-5) have been revised as follows:

Figure 3.15-1 Utilities and Service Systems in the Project Area (Map 1 of 3)

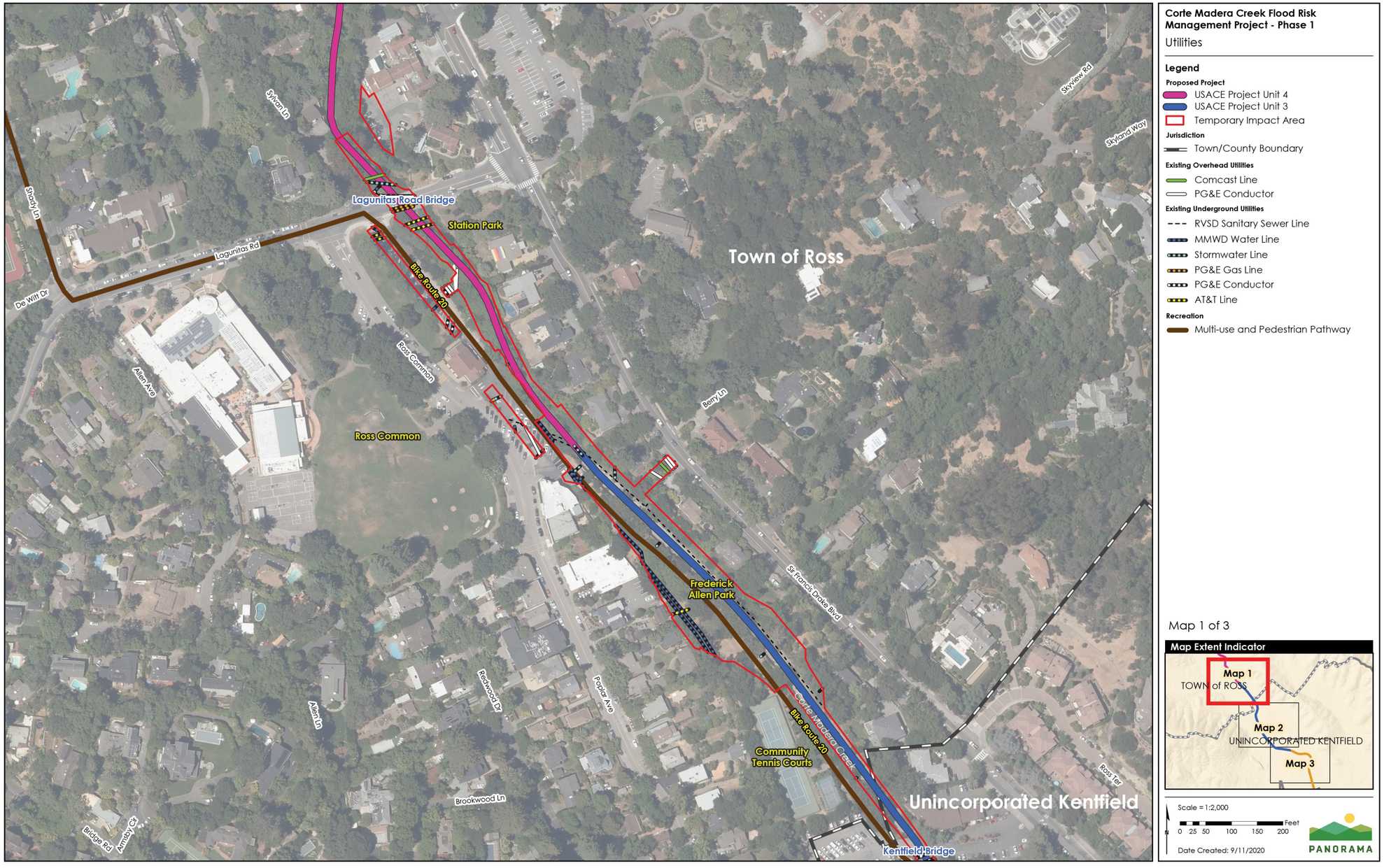


Figure 3.15-2 Utilities and Service Systems in the Project Area (Map 2 of 3)

Corte Madera Creek Flood Risk Management Project - Phase 1

Utilities

Legend

Proposed Project
- USACE Project Unit 3
- Temporary Impact Area

Jurisdiction
- Town/County Boundary

Existing Overhead Utilities
- Comcast Line
- PG&E Conductor

Existing Underground Utilities
- RVSD Sanitary Sewer Line
- Stormwater Line
- PG&E Gas Line
- College of Marin Line

Recreation
- Multi-use and Pedestrian Pathway

Map 2 of 3

Scale = 1:2,000

0 25 50 100 150 200 Feet

Date Created: 9/11/2020

PANORAMA

Figure 3.15-3 Utilities and Service Systems in the Project Area (Maps 3 of 3)

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3.16 Agriculture and Forestry Resources, Mineral Resource, Land Use and Planning, Population and Housing, Wildfire, and Socioeconomics

A staff-initiated text change has been made to page 3.16-36 in the Draft EIR as follows:

~~U.S. Census Bureau. (2000). 2000 Census. Retrieved August 14, 2020, from https://www.census.gov/programs-surveys/decennial-census/decade.2000.html~~

~~U.S. Census Bureau. (2010). 2010 Census. Retrieved August 14, 2020, from https://www.census.gov/programs-surveys/decennial-census/decade.2010.html~~

~~U.S. Census Bureau. (2020). Population and Housing Unit Estimates Tables. Retrieved August 19, 2020, from https://www.census.gov/content/census/en/programs-surveys/popest/data/tables.2015.html/~~

3.2.6 Chapter 4 Growth Inducing and Cumulative Effects

In response to comment B1-20, page 4-10 in the Draft EIR has been revised as follows:

23	Corte Madera Creek Project Phase II (Friends of Corte Madera Creek Watershed)	Corte Madera Creek Project Phase II would include removal of the existing concrete channel from College Avenue <u>to Stadium Way</u> along College of Marin property. The channel bed would be in natural substrate. The right bank would be laid back to create a natural creek slope. The left bank would remain with either an existing concrete wall, a new shorter wall, or large rock embankment to protect an existing Ross Valley Sanitation District owned sewer pipeline that runs parallel to the concrete channel left bank. <u>In addition, the proposed project would relocate Bike Route 20 from the right bank to the left bank of the creek.</u>	Project Planning	Not currently scheduled. Engineering and environmental for Phase 2 will begin after completion of Phase I.

A staff-initiated text change has been made to Table 4.3-1 in the Draft EIR (page 4-13) as follows:

<u>30, 31, 32, and 33</u>	Marin Road, Spruce Road, Canyon Road, and Creek Road Bridge Rehabilitation	The Town of Fairfax is planning upgrades to four bridges which span San Anselmo and Fairfax Creeks on Marin Road, Spruce Road, and Canyon Road. Major upgrades may require seismic retrofits to address structural issues.	The projects are in early planning and require design and environmental review.	The construction schedule cannot be determined due to limited information on the design and environmental review process.

In response to comment B1-21, Cumulative Project #34 has been added to Table 4.3-1 in the Draft EIR (page 4-13) as follows:

34	Learning Resources Center Project (College of Marin)	The project would construct a three-story, 77,000-square-foot replacement facility on the site of the existing building, to address seismic safety and provide upgraded facilities. The associated work would be limited to within the footprint of the existing building, and no alterations would occur to the adjacent pedestrian bridge.	The project currently is under construction.	The construction would take approximately 12 months.

In response to comment B1-21, page 4-15 in the Draft EIR has been revised as follows:

Cumulative Projects

Concurrent construction of the project with cumulative projects proposed within the same viewsheds could result in visual impacts during construction. Projects located within the same viewshed as the proposed project include the access ramp to Corte Madera Creek (#1), Lower Corte Madera Creek Improvement Study (#21), ~~and~~ Corte Madera Creek Project Phase II (#23), and the Learning Resources Center Project (#34).

In response to comment B1-21, page 4-16 in the Draft EIR has been revised as follows:

The Corte Madera Creek Project Phase II and Lower Corte Madera Creek Improvement Study would be located near the Lower College of Marin Project's concrete channel removal. Additional removal of the concrete channel and flood-control improvements to areas downstream of the concrete channel would appear consistent with the proposed concrete -channel removal and would result in a beneficial aesthetic impact. The Learning Resources Center Project would be constructed before the proposed project and would be in proximity to the floodwall. The new Learning Resources Center would be three stories in height and would appear similar to the existing two-story building at the project site and within the overall context of the college. The proposed increase in floodwall height also would appear similar to the existing floodwall; therefore, the cumulative aesthetic impact from addition of the floodwall and Learning Resource Center would be less than significant. ~~The cumulative aesthetic impact would be less than significant.~~

Toxic Air Contaminants

The only cumulative projects proposed within 1,000 feet of the proposed project include the Access Ramp to Corte Madera Creek (#1), the Cedar Tentative Map (#11), the Corte

Madera Creek Project Phase II (#23), ~~and~~ the Sir Francis Drake Boulevard Rehabilitation (#24), and the Learning Resources Center Project (#34).

In response to comment B1-21, page 4-17 in the Draft EIR has been revised as follows:

Toxic Air Contaminants

The cumulative projects and the proposed project would generate toxic air contaminants (TACs) during construction and operation. The proposed project would include a new generator, but the generator would only be used up to 50 hours per year and would not be a considerable source of TACs. Construction of the Learning Resources Center Project would be completed before the proposed project and would not contribute to cumulative TACs because it would not generate TACs during the same time frame as the proposed project's construction. The Access Ramp to Corte Madera Creek and Sir Francis Drake Boulevard Rehabilitation would be constructed a year prior to the proposed project.

In response to comment B1-21, page 4-21 in the Draft EIR has been revised as follows:

The only cumulative projects located close enough to the proposed project to result in cumulative impacts on cultural resources are the Access Ramp to Corte Madera Creek (#1), ~~and~~ Corte Madera Creek Project Phase II (#23), and the Learning Resources Center Project (#34). The remaining projects are separated from the project by a considerable distance, with intervening developed areas.

In response to comment B1-21, page 4-23 in the Draft EIR has been revised as follows:

Cumulative Projects

The Access Ramp to Corte Madera Creek (#1), Cedar Tentative Map (#11), Lower Corte Madera Creek Improvement Study (#21), Corte Madera Creek Project Phase II (#23), ~~and~~ Sir Francis Drake Boulevard Rehabilitation Project (#24), and the Learning Resources Center Project (#34) would occur in proximity to portions of the project.

In response to comment B1-21, page 4-24 in the Draft EIR has been revised as follows:

Cumulative Projects

The cumulative projects identified in Table 4.3-1 would likely require transport of hazardous materials on Highway 101 and Sir Francis Drake Boulevard during construction. Construction of cumulative projects #1 through #5, #16, #18, ~~and~~ #22 through #25, and #34 would require transport of small volumes of hazardous materials for vehicle and equipment operations during construction.

In response to comment B1-21, page 4-25 in the Draft EIR has been revised as follows:

Handle Hazardous Materials within 0.25 Mile of Schools

As discussed in Section 3.8 Hazards and Hazardous Materials, the project is located within 0.25 mile of three schools. The only cumulative projects located within 0.25 mile

of the same schools include the Access Ramp to Corte Madera Creek (#1), ~~and~~ Corte Madera Creek Project Phase II (#23), and the Learning Resources Center Project (#34).

In response to comment B1-21, page 4-30 in the Draft EIR has been revised as follows:

Cumulative Projects

The Access Ramp to Corte Madera Creek (#1), the Cedar Tentative Map (#11), the Lower Corte Madera Creek Improvement Study (#21), Corte Madera Creek Project Phase II (#23), ~~and~~ Sir Francis Drake Boulevard Rehabilitation Project (#24), and the Learning Resources Center Project (#34) are located within 1,000 feet of portions of the project.

Noise and Vibration

The proposed project and cumulative projects would only generate substantial noise and vibration during the construction phase. Cumulative noise and vibration impacts would, therefore, only occur if the proposed project and cumulative projects within 1,000 feet of the proposed project were constructed at the same time. The access ramp to Corte Madera Creek, ~~and~~ Sir Francis Drake Boulevard Rehabilitation, and Learning Resources Center Project would be constructed prior to the proposed project and would not cause a cumulative noise impact.

In response to comment B1-21, page 4-34 in the Draft EIR has been revised as follows:

Cumulative Projects

Several of the cumulative projects will require removal of trees, including the following:

- San Anselmo Creek flood control – nursery basin site (#3)
- Hillview pump station and stormdrain (#5)
- Brownridge tree removal (#12)
- Cooney tree removal (#14)
- Real Equity tree removal (#20)
- Lower Sleepy Hollow Creek Improvements (#22)
- Corte Madera Creek Project Phase II (#23)
- Learning Resources Center Project (#34)

Cumulative Projects

Cumulative projects located within the geographic scope of analysis include the Winship Avenue Bridge Replacement Project (#6), the access ramp to Corte Madera Creek (#1), a number of minor structures, tree removal, and land-use modifications (projects #7 #8, #9, #10, #11, #12, #13, #15, #17, #19, and #20), ~~and~~ the Marin Health Care District, and the Learning Resources Center Project (#34).

A staff-initiated text change has been made to page 4-34 in the Draft EIR as follows:

Cumulative Impact

The cumulative projects identified in **Error! Reference source not found.** are required to obtain a permit from Marin County or other local jurisdictions for removal of trees

greater than 6 inches diameter at breast height. The County and local tree permits require replacement plantings for trees that will be removed by the cumulative projects. Compliance with the mitigation included in each project's tree removal permit will result in replacement of trees removed by cumulative projects. The cumulative projects in combination with the proposed project would not result in a cumulative impact on forestry resources because each of the cumulative projects would provide mitigation to offset the trees removed. The cumulative impact would be less than significant. ~~Land Use and Planning~~

4.4.16 Land Use and Planning

3.2.7 Alternatives

In response to comment A5-32, page 5-16 of the Draft EIR has been revised as follows:

> The No Project Alternative would avoid the proposed project's impact on GHG resulting from use of off-road construction equipment and vehicles during project construction and would avoid GHG emissions from operation of the emergency generator and energy use at the stormwater pump station. The No Project Alternative would have minimal greenhouse gas emissions during maintenance of existing facilities, like the proposed project. However, the No Project Alternative would not involve creation of natural riparian habitat and would not create the greenhouse gas emission reduction benefits of the proposed project.

In response to comments A5-32 and A5-33, page 5-24 in the Draft EIR has been revised as follows:

> ***Comparison of Impacts to the Proposed Project***
>
> Alternative 1 would involve the same type of equipment as that used by the proposed project, but the construction schedule would be shorter under Alternative 1 because no construction would occur in Frederick Allen Park. The number of construction truck trips under this alternative also would be ~~slightly~~ lower than the proposed project because of avoidance of Frederick Allen Park, which would reduce the construction GHG emissions. Operational GHG emissions under Alternative 1 would be ~~the same as~~ greater than the proposed project because Alternative 1 would not remove the concrete channel and would not include as much vegetation in Frederick Allen Park. Temporary GHG emission impacts associated with implementation of Alternative 1 would be less than that of the proposed project, but Alternative 1 would have reduced long-term GHG reduction benefits than the proposed project.

In response to comment A5-32, page 5-37 of the Draft EIR has been revised as follows:

> Alternative 1 would have less long-term benefits to aesthetics, biological resources, geology and soils, greenhouse gases, hydrology and water quality, and recreation than

the proposed project because Alternative 1 would not include creation of a natural creek channel, floodplain, and riparian habitat in Frederick Allen Park.

In response to comment A5-32, page 5-41 is revised as follows:

Alternative 2 Impacts

Alternative 2 would require use of construction equipment to construct the boardwalk and maintenance access path. Implementation of Alternative 2 in combination with the proposed project elements in other areas would result in generation of air quality and GHG emissions equivalent to the proposed project, including emissions of toxic air contaminants because the boardwalk and maintenance path would be constructed in lieu of the paved pathway and unpaved access to the creek. Implementation of Mitigation Measures 3.3-2 and Mitigation Measure 3.3-3, which would require implementation of dust control measures and use of USEPA or CARB Tier 3 or higher rated equipment would reduce the impact of Alternative 2 in combination with the proposed project in other areas to a less-than-significant level, similar to the project impact described in detail in Chapter 3. Alternative 2 would require removal of the same number of trees as the proposed project. Alternative 2 would allow increased planting relative to the proposed project because light and water could penetrate the boardwalk, which would allow planting underneath it. <u>The increased planting would result in long-term GHG reduction benefits.</u>

In response to comment A5-32, page 5-47 in the Draft EIR has been revised as follows:

Air Quality and Greenhouse Gases

Alternative 3 would involve the use of construction equipment and vehicles that would result in temporary GHG emissions, similar to the proposed project. The amount of equipment and vehicle use, as well as fugitive dust and GHG emissions associated with Alternative 3 could be slightly higher than the proposed project because of the increased project footprint and associated number of truck trips for material import and export in Unit 2. Implementation of Mitigation Measure 3.2-1 would reduce the impacts to a less-than-significant level. The alternative would comply with all applicable BAAQMD rules and regulations and would not result in extended exposure of nearby residences to criteria air pollutants or toxic air contaminants. Operational air quality <u>and GHG emissions</u> impacts would be the similar to the proposed project because maintenance activities are anticipated to be similar and infrequent.

In response to comment A5-32, Table 5.4-1 on page 5-54 is revised as follows:

Table 5.4-1 Comparison of Alternatives and Environmental Considerations

Topic	Proposed Project	No Project Alternative	Alternative 1: Reduced Footprint–Avoid Frederick Allen Park (with proposed project in other areas)	Alternative 2: Maintain Elevation of Bike Route 20 in Frederick Allen Park and No Creek Access (with proposed project in other areas)	Alternative 3: Reduced Concrete (with proposed project in other areas)
Greenhouse Gas (GHG) Emissions	LTS impact from GHG emissions	No Impact	LTS < <u>></u> The reduced construction in Frederick Allen Park would result in reduced GHG emissions <u>during construction, but the alternative would not achieve the long-term GHG reduction emissions</u>.	LTS = <u><</u> The construction intensity would be similar to the proposed project and would have similar GHG emissions. <u>The alternative would have greater GHG reduction benefits.</u>	LTS > The floodwall construction in Unit 2 would result in slightly greater hauling of material and slightly increased GHG emissions, compared to the proposed project.

3.2.8 Report Preparation

No revisions were made to this section.

3.2.9 Appendices

In response to comment A5-34, page G-3 of Appendix G has been revised as follows:

Implementation Timing
• Prior to construction • During construction • After construction

In response to comment A5-1, Table G-1 Mitigation Measures of Appendix G (page G-15) has been revised as follows:

Significant Environmental Impact	Mitigation Measure	Application Location	Performance Criteria	Implemented By	Implementation Timing	Monitored By	Verified By (Date and Signature)
Impact 3.1-3: The project would substantially degrade the existing visual character or quality of public views of the site and its surroundings	**Mitigation Measure 3.1-3: Large Tree Planting**. The District will integrate ~~large box trees~~ 24-inch or 36-inch box trees into the final planting plan and design for Frederick Allen Park, to the extent ecologically appropriate for the proposed species. The Town of Ross will provide the desired size and species of trees to the District. The final planting plan will be provided to the Town of Ross for review and approval ~~comment~~ no less than 90 days prior to landscaping. The District will be responsible for maintaining replacement trees until they become established and for replacing dead trees for a period of no less than 10 years.	• Frederick Allen Park	• Planting plan submitted to Town of Ross for review • Large box trees are planted where feasible	• Marin County Flood Control and Water Conservation District (District) • Contractor	• Prior to construction submit planting plan to Town and obtain Town approval • During construction implement planting plan • Post-construction monitor tree success and maintain trees		
Impact 3.4-2: The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	**Mitigation Measure 3.4-2: Inadvertent Discoveries of Archaeological Resources.** If evidence of any subsurface archaeological features or deposits are discovered during construction-related earth-moving activities, all ground-disturbing activity in the area of the discovery shall be halted within 50 feet of the find, and the finds shall be protected until they are examined by a qualified archaeologist. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; stone-milling equipment (e.g., mortars, pestles, handstones, milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls and deposits of metal, glass, and/or ceramic refuse. The District shall retain a qualified archaeologist who meets the U.S. Secretary of the Interiors professional qualifications in archaeology to assess the significance of the find and make recommendations for further evaluation and treatment as necessary. A Native American representative from a traditionally and	• Any locations where archaeological deposits are encountered	• Halt work within 50 feet of a find and contact archaeologist.	• District • Construction contractor • Qualified archaeologist	• Plan prepared prior to construction • Avoidance and treatment implemented during construction, as needed.		

Significant Environmental Impact	Mitigation Measure	Application Location	Performance Criteria	Implemented By	Implementation Timing	Monitored By	Verified By (Date and Signature)
	culturally affiliated tribe will be notified and invited to assess the find if the artifacts are of Native American ancestry and determined to be more than an isolated find. If the discovery is in an area below Stadium Way and on lands under the jurisdiction of California State Lands Commission, that agency shall be notified. Any treatments and disposition of any artifacts uncovered under the jurisdiction of the California State Lands Commission must be approved by the California State Lands Commission before the treatment is implemented. If, after evaluation, a resource is considered a historical resource or unique archaeological resource (as defined in CEQA Guidelines Section 15064.5), or a tribal cultural resource (as defined in PRC Section 21074), all preservation options shall be considered as required by CEQA (see CEQA Guidelines Section 15126.4 and PRC 21084.3), including possible capping, data recovery, mapping, or avoidance of the resource. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work in the area may resume, at the direction of the District, upon completion of treatment. An Unanticipated Discoveries Evaluation and Treatment Plan shall be prepared before construction that details the procedures for dealing with unanticipated discoveries, including procedures that would be implemented for such discoveries that cannot be protected in place. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results, and distributes this information to the public.						

Significant Environmental Impact	Mitigation Measure	Application Location	Performance Criteria	Implemented By	Implementation Timing	Monitored By	Verified By (Date and Signature)
Impact 3.12-3: The project could affect existing recreational opportunities.	**Mitigation Measure ~~3.1-2~~ 3.1-3: Large Tree Planting (see Aesthetics and Visual Resources above)**	• See above	• See above	• The District • Contractor	• Prior to construction • During construction		
Impact 3.13-1: The project could conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	**Mitigation: Mitigation Measure 3.13-1: Traffic Management** Prior to initiation of construction, the Project contractor(s) shall use a qualified traffic engineer to prepare a Traffic Management Plan (TMP). The TMP shall be developed on the basis of detailed design plans. The TMP shall be reviewed and approved by the District and agencies with jurisdiction over roadways affected by project construction activities prior to construction. Once approved, the TMP shall be incorporated into the contract documents specification. The TMP shall include, but not necessarily be limited to, the elements listed below: • Develop a detour plan for bicycle and pedestrian traffic that shows the approach to reroute traffic on Bike Route 20 to Poplar/Kent Avenue from the College of Marin Parking lot to Ross Common. • Post temporary Bike Route 20 detour and associated signage that meets all the accessibility requirements stated under the Americans with Disabilities Act and CBC Title 24. • Post signs providing public notice of detours at least ~~14~~ 20 days prior to temporary bike route closure. • Provide flaggers at the tennis courts within Frederick Allen Park to provide safe pedestrian access to the tennis courts. • Control and monitor construction-vehicle movements by enforcing standard construction specifications through periodic on-site inspections. • Install traffic-control devices where traffic conditions warrant, as specified in the applicable jurisdiction's standards (e.g., the California Manual on Uniform Traffic Control Devices; Part 6: Temporary Traffic Control); flaggers would be used, when warranted, to control vehicle movements.	• Bike Route 20 closure/detour area • Frederick Allen Park • College Avenue • Laurel Avenue • Staging areas • ~~All areas~~	• TMP prepared • Notified public regarding construction activities and traffic impacts • Traffic control measures including detours implemented • Traffic control devices installed • Comply with roadside safety protocols • Emergency vehicle access maintained at all times • Equipment stored in designated areas to avoid obstructing traffic	• Construction • Qualified traffic engineer	• Prior to construction prepare TMP • During construction implement flaggers and traffic controls per the measure		

Significant Environmental Impact	Mitigation Measure	Application Location	Performance Criteria	Implemented By	Implementation Timing	Monitored By	Verified By (Date and Signature)
	• Implement a public information program to notify interested parties of the impending construction activities using means such as print media, radio, and/or web-based messages and information. • Comply with roadside safety protocols to reduce the risk of accidents. • Maintain access for emergency vehicles at all times. Provide advance notification to local police, fire, and emergency service providers of the timing, location, and duration of construction activities that could affect the movement of emergency vehicles on area roadways. • Store all equipment and materials in designated contractor staging areas on or adjacent to the worksite in such a manner as to minimize obstruction to traffic.						

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