
Final Environmental Impact Report

PREPARED FOR

SONOMA COUNTY

DEPARTMENT OF TRANSPORTATION & PUBLIC WORKS

BOHEMIAN HIGHWAY BRIDGE OVER RUSSIAN RIVER REPLACEMENT PROJECT

Bridge #20C0018

04-SON-0-CR

State Clearinghouse SCH #2021030538

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**Sonoma County Permit and Resource Management Department
Natural Resources Division
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Appendix

Appendix A Written comments received during the circulation of the Draft EIR.

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1 Introduction

1.1 Purpose of the Response to Comments on the Draft EIR

This document contains responses to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for the Bohemian Highway Bridge over the Russian River Replacement Project (Project). The Draft EIR identifies the likely environmental consequences associated with the proposed Project and recommends mitigation measures to reduce potentially significant impacts. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project. The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving the proposed Project (CEQA Guidelines, Section 15090).

California Environmental Quality Act (CEQA) Guidelines (Section 15132) specify the following:

“The Final EIR shall consist of:

- (a) The Draft EIR or a revision of that draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in a summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in review and consultation process.
- (e) Any other information added by the Lead Agency.”

This document has been prepared pursuant to CEQA and in conformance with the CEQA Guidelines. This Response to Comments Document incorporates comments from public agencies and the general public, and contains appropriate responses by the Lead Agency to those comments.

1.2 Environmental Review Process

Pursuant to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed Project and to provide the general public with an opportunity to comment on the Draft EIR.

The County of Sonoma distributed a Notice of Preparation (NOP) of the Project EIR for a 30-day agency and public review period commencing March 22, 2021, and closing April 21, 2021. In addition, the County held a virtual Scoping Meeting on April 14, 2021. The meeting, held from 6:00 p.m. to 7:00 p.m., was aimed at providing information about the proposed Project to members of public agencies, interested stakeholders and residents/community members, and at receiving comments on the scope and content of the EIR. Due to the COVID-19 pandemic, the virtual meeting was held through an online meeting platform and a call-in number.

The Draft EIR was made available for public review for a 45-day comment period that began on April 4, 2022 and ended on May 18, 2022. The Notice of Availability of a Draft EIR was posted with the County Clerk, sent to the State Clearinghouse, forwarded to local and state agencies, published in The Press Democrat newspaper, mailed to property owners and emailed to interested parties. In

addition, the County also held a public hearing to receive oral public comment on the Draft EIR at the Sonoma County Board of Supervisors on May 17, 2022.

The County received seven individual written comments on the Draft EIR. Copies of written comments received during the comment period are included in Appendix A of this document.

1.3 Document Organization

This document consists of the following chapters:

- **Chapter 1: Introduction.** This chapter discusses the CEQA process and the organization of this Response to Comments Document.
- **Chapter 2: Persons Commenting at the Public Hearing.** This chapter contains a list of all persons and organizations that made spoken comments on the Draft EIR during the public review period.
- **Chapter 3. Written Comments and Responses.** This chapter contains a summary of comment letters received on the Draft EIR. A written response for each CEQA-related written comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- **Chapter 4: Revisions to the Draft EIR.** This chapter contains errata identifying text changes to the Draft EIR. Some changes were made by the County; others were made in response to comments received on the Draft EIR.

2 Persons Commenting at the Public Hearing

A public hearing on the Draft EIR was held by the County on May 17, 2022. The following individuals provided spoken comments on the Draft EIR:

No comment from the public was heard during the hearing.

District 5 Supervisor, Linda Hopkins.

Supervisor Hopkins expressed that she would have liked to see additional roadway improvements at the triangular intersection of Bohemian Highway, D Street and State Route 116. Improvements would enhance safety for pedestrian and bicycle users in the community. Supervisor Hopkins suggested that even if not part of the Federal bridge Project, had the EIR addressed this area, the County would have had a document to tier off of for a future project.

In response, County staff stated that potential improvements to the triangular intersection would serve a separate utility than the proposed Project and that enlarging the CEQA study area to include the triangle and bridge approach would have significantly delayed the Project, subjecting the County to potentially miss critical State required milestone deadlines. In addition, to try and separate out the costs of the environmental studies required for the bridge versus the triangle intersection improvements would have been problematic, and not something that Caltrans typically would agree to or be able to accommodate.

Though additional roadway improvements at the referenced intersection could enhance safety for pedestrians and people who ride bicycles, at this time there is no plan or commitment from the County, or available funding source to develop the triangular intersection. Thus, potential roadway improvements are speculative at this point.

3 Written Comments and Responses

This chapter includes written comments received during the circulation of the Draft EIR prepared for the Bohemian Highway Bridge over the Russian River Replacement Project, and responses to those comments. Each written comment letter is designated with a letter (A through G) in the upper right-hand corner of the letter.

Table 1 Comment Letters Received

Alphabetic Code	Commenter	Affiliation	Date Received
A	Stephen k. Baxman, Chair MRRPD Board of Directors	Monte Rio Recreation and Parks District	May 17, 2022
B	Erin Chappell, Regional Manager Bay Delta Region	State of CA Dept. of Fish and Wildlife	May 27, 2022
Organizations			
C	Ed Fortner, General Manager	Sweetwater Springs Water District	April 11, 2022
D	Justin Newell, Land Agent	Pacific Gas and Electric	April 8, 2022
Individuals			
E	Brenda Adelman	Public	April 6, 2022
F	Christmas Leubrie	Public	April 7, 2022
G	Steve Loving	Public	April 4, 2022

The comment letters and responses follow. The comment letters have been assigned a unique letter and each separate issue raised by the commenter, if more than one, has been assigned a number. Where responses have resulted in changes to the Draft EIR, these changes also appear in Chapter 4 of this Response to Comments Document. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

Letter A

COMMENTER: Stephen k. Baxman, Chair MRRPD Board of Directors, Monte Rio Recreation and Parks District. Attached to the comment letter is a Summary of Findings Memo drafted by LACO and Associates.

DATE: May 17, 2022

Response A-1.1

The commenter states an opinion that the visual dominance should be considered at least a “Co-Dominant” feature on the landscape. There should be more detail provided to justify the claim that there will be no permanent visual impact on the environment.

The proposed bridge generally repeats the form, line, color, and night lighting of its surroundings, consistent with a visual dominance determination of “subordinate.” The Visual Impacts Analysis (VIA) prepared for the County and Caltrans (Federal Lead Agency) determined aesthetic impacts by evaluating the aesthetics of the current bridge compared to the bridge proposed by the Project, as observed from several (6) public viewpoints. The report determined that the replacement bridge is designed to not introduce contrasting elements to the existing landscape, and would improve the existing viewshed as the bridge would introduce more natural curved lines, as opposed to the more angular structure of the existing bridge. The proposed bridge would not include piers within the low flow channel, removing visual obstructions to views of the river as compared to the existing structure. The designs proposed were carefully developed in coordination with the local community to be context sensitive to the existing setting and local history of the Project area. Paint color will also be chosen in coordination with the community, and includes nature tones so that the structure will better blend in with the surrounding landscape. Further, the Project improvements would be consistent with existing use of the Project area as a transportation corridor and would be required to ensure the continued access over the Russian River between the northern and southern portions of Monte Rio. Therefore, visual changes would be considered beneficial and seen as an asset to the community. Based on the information above, the County determined a visual dominance of subordinate compared to the existing site conditions per Sonoma County Visual Assessment Guidelines and the project VIA.

Response A-1.2

The commenter suggests that regarding “dark sky compliance”, more detail is necessary to demonstrate project compliance, such as downward facing and shielded lighting.

The Draft EIR is a planning level document based on 35 percent design plans. The Project will comply with “dark sky” lighting standards, although the specifics as to lighting placement and light fixture model used will be incorporated into future final design. These lights will be downward facing and will also be orientated so that the light remains on the bridge deck and does not spill over into the Russian River below. Shielding will be incorporated to ensure light pollution is minimized to the extent feasible.

Response A-2.1

The commenter states that the cited geological/ geotechnical report referenced in the Draft EIR is not included. The report claims the designs will meet standard seismic and soil stability requirements, but it does not state what the “standards” are.

None of the reference materials are attached to the report, but they are made available upon request at Sonoma County Permit and Resource Management Department. The Project Preliminary Foundation Design Information Memorandum was referenced for the soils and geology and soils chapter. This Memorandum provides geotechnical information to help inform the foundation type selection for the proposed Project.

The design of scour consideration follows Section 3.7.5 of California Amendments in the American Association of State Highway and Transportation Officials (AASHTO) Load and Resistance Factor Design (LRFD) Bridge Design Specification (BDS) (8th edition). The Project is also required to adhere to the Caltrans Seismic Design Criteria, which specifies the minimum seismic design requirements for newly designed bridges.

Response A-2.2

There is no mention of whether the project could exacerbate the liquefaction potential for soils on adjacent properties.

The Project will not affect the liquefaction potential associated soils on with adjacent properties. Liquefaction takes place when loosely packed, water-logged sediments at or near the ground surface lose their strength in response to strong ground shaking. This is a phenomenon based on the existing soils conditions. The Project would not affect the existing soil conditions, at either the Project location or adjacent properties. The bridge has been designed to address the potential for liquefaction during a seismic event.

Response A-2.3

There is no description or study of how the removal of the existing piles in the river will/may impact the hydrology of the river or the adjacent MRRPD owned properties.

The removal of existing piers is not expected to have a negative impact on the hydrology of the river or its affects to adjacent MRRPD owned properties. The Draft EIR, page 4.15-16 states that the removal of the existing bridge and its piers will open up the low-flow river channel, improving conditions for flood hydraulics, water recreation, and fisheries habitat. Removing the piers supporting the existing bridge and reducing the number of piers in the channel with the replacement bridge will allow for a more unrestricted flow and modeling has shown there will be an overall net benefit to the river hydrology and a reduction in the 50 and 100 year flood flow surface elevations at the Project site. Impacts to adjacent MRRPD properties would be less than significant.

Response A-2.4

The commenter states that the discussed Best Management Practices (BMPs) are general and not site specific. The commenter requests that the MRRPD should be provided with the details of the site specific BMPs to understand how the impacts of storm water will be managed. The commenter request a copy of the Storm Water Pollution Prevention Plan (SWPPP), with contact information for the contractor responsible for maintaining the BMPs during construction. The BMPs should also not be limited to surface water conditions but also in place to protect groundwater. It is important for the report to note BMPs are in place to protect ground water supplies, when they will be installed and what their specifics will be

Use of “standard BMP’s” is the appropriate level of description for a project at 35 percent design. Standard practice for construction projects is to include in the Project specifications that the selected contractor provide a detailed SWPPP (where greater than 1 acre of disturbance will take

place) prior to initiating construction activities. Sonoma County will review and approve the plan to ensure its adequacy to protect both surface and ground water resources. Sonoma County will provide the MRRPD with the Project SWPPP once it is received and approved.

BMP's for the construction site are intended to prevent potentially contaminated water from leaving the job site. Implementation of BMP's to ensure both surface and ground water in the vicinity of the Project site will be a requirement as part of the Projects construction specifications.

Response A-3

The commenter states that the report generally lacks abatement protocols to address aerially deposited lead or asbestos in structures slated for demolition and removal.

Per Section 4.9.1, Further aerially deposited lead (ALD) and asbestos containing material (ACM) investigations will be performed prior to initiating construction work by an inspector certified under Asbestos Hazardous Emergency Response Act (AHERA) Toxic Substances Control Act (TSCA) Title II and certified by Cal OSHA under State of California rules and regulations (California Code of Regulations, Section 1529). If determined present, ADL/ ACM will be abated by using contractors certified to perform such work, and in accordance with state and federal regulations.

Response A-4

The commenter request that the Project include as a mitigation, "contractor required to smooth and regrade areas to match preconstruction conditions." There should be attention paid to the removal of in-water gravel pads with culverts for water passage that will temporarily alter the course of the river. The MRRPD should be presented with a clear plan as to how the contractor will address flooding during construction to avoid floating debris impacting adjacent properties.

Comment is noted and the requirement to smooth and regrade disturbed areas to match preconstruction conditions is described within the Draft EIR, page 4-10-18. Per requirements of the General Construction Permit and the Project SWPPP, the contractor will be required to winterize the construction site from October 15- May 15. This should ensure construction related materials will not be present during wet weather months and so will not impact adjacent properties if flood conditions occur in the area.

Response A-5

The commenter states that the DEIR does not indicate noise impacts on the MRRPD properties, including beaches, Koret Park, the Community Center and the Riverfront Meadow. The commenter raises the opinion these properties should be included particularly because the beaches see their heaviest uses between April and October coinciding with the construction period. Impact does not include "receptors" for mid-day users on the beaches. The "receptors" impacted are identified as the occupants on adjacent improved properties. There will be an impact of the noise on the beach for beach users. The MRRPD requests the noisiest of activities be conducted when the beach experiences the lowest level of use/occupation.

This comment is noted and will be passed on to County decision-makers. The analysis used the Sonoma County Noise Guidelines which determines sensitive receptors. Recreational beach users are not considered to meet this definition. A Construction Noise & Groundborne Vibration Technical Memorandum was prepared for the County and Caltrans. While construction will increase noise, the memorandum determined that the allowable thresholds determined within the Sonoma County

General Plan would not be exceeded with mitigation measures implemented, and therefore noise impacts would be a less than significant impact.

Response A-6.1

The commenter raises concern about partial closure of travel lanes, and requests that the duration and frequency of partial closures should be clarified to address impacts to and response times for emergency services crossing the bridge during construction.

The existing bridge shall remain open during the first two construction seasons. Only after the replacement bridge is opened to traffic in Construction Season Three, will the existing bridge be closed and removed from the site. Generally bridge closures shall at no point during construction last for a duration of more than 30 minutes. If a planned short term closure is required for safety reasons, the planned closure will be coordinated with emergency response providers prior to closure to ensure response time are not affected.

Response A-6.2

The commenter raises concerns about parking. The lower parking is not available from October 15-May 15. The existing lower parking area can accommodate more vehicles than listed in the report and as such, maintaining 100 percent of the parking has not been confirmed. In addition, it is described that portions of the Big Rocky Beach will be closed for periods of construction in the third year. The parking allotments for each year should be more clearly identified as it is the MRRPD's opinion that 100 percent of parking cannot be maintained on MRRPD properties. The report states opening of parking areas during certain dates and finding alternative off-site parking for boat trailers. The locations and configurations of these parking conditions and details have yet to be confirmed.

Parking areas subject to potential closure during construction are provided in the 35 percent design plans together with proposed re-configuration of parking spaces. Throughout discussions with both the Monte Rio Parks Recreation and Parks District and the CA Department of Fish and Wildlife, Sonoma County Transportation and Public Works has maintained its commitment to providing 100 percent of existing parking, for both recreation users of the beaches and fishing access via pull through spaces capable of accommodating boat trailers. The level of details known are in line with the 35 percent design plans informing the CEQA analysis.

Response A-6.3

The commenter raises concerns regarding scour holes left in the river once the existing bridge piers are removed. The report should further describe if these scour holes are to be remediated/corrected or left as is.

Scour holes associated with the bridge to be removed will be graded to match adjacent gravel bar grade. This will likely include filling with either onsite or imported clean river run gravel used to create the in channel work pad.

Response A-6.4

The report states the removal of the existing piers and installation of the new bridge will be less than a significant impact to recreation and it is the MRRPD opinion that additional justification for this determination is needed.

The removal of existing piers is not expected to have a negative impact on the hydrology of the river or negatively affect adjacent MRRPD owned properties. Beach access will remain open throughout construction. At times portions of the beach will be fenced off for public safety reasons. The limited access will be temporary during the construction seasons. Post construction beach use would be similar to existing conditions. There will be a beneficial impact to the low flow channel for water recreation users due to the removal of the existing bridge piers and the pre-1934 remnant bridge pier footing, improving safety and increasing areas available for recreational users. Impacts to recreation would be temporary and less than significant.

Response A-7.1

The commenter raises concerns regarding the lack of crosswalks at the northern anchorage of the bridge. The commenter states the opinion that the area experiences a high volume of pedestrian and bicycle traffic and it is expected that traffic will increase due to the future improvements for bicycle lanes and pedestrian walkways. A provision should be made for accommodating the non-motorized traffic on the bridge to safely enter the public beach and parking areas specifically from the upstream side of the bridge across Bohemian Highway to the parking lot entry.

Crosswalks are planned at this location. The bridge itself is designed to accommodate future plans to expand pedestrian and bicycle facilities in the area. Page 4.16-5 of the Draft EIR, states that the Project was presented to the Sonoma County Bicycle and Pedestrian Advisory Committee and was found to be in conformance with the policies in the 2010 Sonoma County Bicycle and Pedestrian Plan. The Project proposes no new features that would be hazardous to bicycles or pedestrians. Sidewalks and bike lanes in conformance with the County's General Plan and Bicycle and Pedestrian Plan are included in the Project design.

Future planned bike trails in the vicinity of the bridge location presented in the Sonoma County Bicycle and Pedestrian Plan include the Russian River Trail (from Healdsburg ending at Monte Rio Bridge) and Dutch Bill Creek Trail (starting at Hwy 116 and ending at Graton along portions of the North Coast Railroad right-of-way). These bicycle and pedestrian trail projects are not included as a part of the bridge replacement Project but may become funded and constructed by the County and its partners in the future.

Response A-7.2

The commenter states the Sonoma County Transit bus stops on Bohemian Highway between the bridge and Highway 116. The bus stops are not indicated on the striping/signage plan and it is unclear how those stops will be provided with adequate area for loading and unloading passengers safely. Efforts should be made to coordinate with SCT as per minimum bus stop standards.

The plans will accommodate a bus stop. Sonoma County has initiated coordination with Sonoma County Transportation Authority and will continue to do so as design progresses through the right of way phase and into final design. The capability to provide bus service will not be impacted, and bus access is anticipated to be improved at this location.

Response A-7.3

The commenter states that there is not currently a provision for an at-grade sidewalk and curb from the northern anchorage of the bridge along the new retaining wall facing the CDFW parking area. Consideration should be made for a sidewalk and curb at this location to provide a safe pedestrian path of travel from the driveway entrance to the access road fronting the beach. This area has historically been a congested vehicle area and for the purposes of maintaining an adequate

emergency vehicle access lane to the beach, the curb at the full length of the improved sidewalk should be painted red to indicate a no parking or stopping area.

Although this comment does not pertain to the analysis or conclusions of the EIR, the comment is noted and will be forwarded to the decision makers for their consideration. As currently designed post-construction conditions will be similar to existing conditions.

Letter AA

The Monte Rio Recreation and Parks District requested the LACO and Associates perform a peer review of the Draft EIR on behalf of the MRRPD to assess the adequacy of the Draft EIR and potential impacts to the MRRPD and associated facilities. Although Sonoma County doesn't consider the peer review as formal submission of comments, the document has been attached to MRRPD comments and is therefore a part of the administrative record. The County has identified comments within the document that raises a potentially significant environmental issue in addition to those raised in the Districts formal comment submission letter.

Response AA-1

The review states that within the Executive Summary chapter 3.1.3 "One item of note is the Anticipated Construction Schedule and Methods section of the Project Description, which states that no work is proposed on weekends and holidays (p.2-13). This differs from mitigation measure PS-1, which states that weekend work may be allowed, on a limited basis, with prior approval from the Department of Transportation and Public Works, during the hours of 9:00 a.m. and 5:00 p.m. (p.4.15-17).

The Project Specifications will generally prohibit work on nights, weekends and holidays. Only in exceptional circumstances where a specific work task cannot halt or pause, or under emergency circumstances, the contractor may petition the County Department of Transportation and Public Works for approval to continue working outside of the described 9:00am – 5:00pm weekday work schedule. If granted, mitigation measure PS-1 would apply. During construction, the County will have a Resident Engineer who is a dedicated point of contact who will provide construction updates throughout the construction process.

Response AA-2

The reviewer (LACO) offers several opinions on items within the Aesthetics chapter 4.1:

One item LACO feels could have been discussed was whether removal of the piles from the river change the shape of the river and/or adjacent MRRPD resources (such as the adjacent beach).

The reviewer offers the opinion they do not entirely agree with the chosen Subordinate visual dominance classification, nor is there any justification provided. The reviewer feels more detail is needed to support the justification, why the new bridge would not have permanent visual impacts, and why the bridge would be "fully compatible" per the statement should have been included. Finally, under Impact AES-4, related to light and glare, the Draft EIR claims this impact would be reduced to a less-than-significant impact with implementation of Mitigation Measure AES-4 (p.4.1-23); however, there is nothing specific to light or glare in this mitigation measure (such as meeting standards of the International Dark Sky Association, including downward facing and shielded lighting, etc.). It is also claimed that no new sources of glare would occur as a result of the Project (p.4.1-23); however, no explanation is provided to support this claim (i.e., use of non-reflective materials, etc.).

Additionally, Mitigation Measure AES-1 uses the phrase "to the extent feasible" is not appropriate and therefore an unenforceable mitigation measure. Furthermore, this mitigation measure proposes a

replacement ratio of 1:1 for compensatory tree removal. This ratio is generally not an acceptable ratio to the California Department of Fish and Wildlife (CDFW).

Removal of the piers from the river is not expected to change the shape of the river nor negatively impact adjacent MRRPD resources.

See response to A-1.1 pertaining to visual dominance classifications. Response to A-1.2 pertaining to “Dark Sky” compliance. No new sources of glare would occur, as bridge paint will be non-reflective, and the signage used would be standard retro-reflective to ensure light returns to where it came and nowhere else.

Mitigation measure AES-1 has been revised to remove the language “to the amount feasible” to ensure enforceability. Replacement ratios for vegetation replacement is acceptable for CEQA purposes. Section 4.4, pages 40-41, of the EIR prescribes mitigation for the loss to riparian trees, BIO-4: Riparian Habitat Replacement includes tree replacement at a minimum ratio of 3:1 for permanent impacts and 1:1 for temporary impacts and is essentially the same as CDFW recommends. If CDFW require higher ratios for specific species and size, these numbers would be conditioned within the CDFW Lake and Streambed Alteration Agreement. The strictest of mitigations will be implemented to ensure mitigations and conditions are adequately met. See response to comment B-1 below for additional detail.

Response AA-3

The reviewer (LACO) offers several opinions on items within the Air Quality chapter 4.3:

The reviewer states that this section does not explicitly state if the Project meets or does not meet screening criteria in the 2017 CEQA Air Quality Guidelines; the reader has to infer. However, since demolition would occur under the Project, the Project would not meet the criteria and it is assumed that that is why estimated emissions were required to be modeled. This is not explained in the section.

Further, it is stated that construction would temporarily increase air pollutant emissions, and possibly created localized areas of unhealthy air pollution levels or air quality nuisances (p. 4.3-13). Due to the proximity of MRRPD facilities to the Project site, there appears to be the potential for impacts to occur at those locations and to users of these facilities.

The review states that LACO believe copies of the modeling results should have been included as appendices so that interested parties could have the opportunity to further review the data.

The reviewer is correct in that the construction related impacts do not meet the Bay Area Air Quality Management District Screening Criteria due to the need for removing the existing structure, i.e. Demolition. As described on page 4.3-13, A Construction Air Pollutant and Greenhouse Gas Emission Analysis was completed in 2021. The construction emission model found that there would be no emissions above the BAAQMD significance thresholds. Copies of the inventory report are available upon request at the Sonoma County Permit and Resource Management Department.

Temporary increases in air pollutants are expected from the use of construction equipment and the demolition of the old bridge. Any unhealthy air quality would be localized within the construction zone and are not anticipated to occur outside on that area.

Response AA-4

The reviewer (LACO) offers several opinions on items within the Biological Resources chapter 4.4:

While the studies and impact analysis appear adequate for this Project, many of the fifteen (15) mitigation measures use the phrase “to the extent feasible” and therefore are difficult to quantify or

enforce. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments.

Furthermore, see comments regarding AES-1, which is also of note with regard to the adequacy of this section for tree removal and replacement.

Mitigations Measures have been update to reflect the review and ensure those measures are enforceable. Those changes are reflected in Section 4 below.

Replacement ratios for vegetation replacement is acceptable for CEQA purposes. Section 4.4, pages 40-41, The EIR prescribes mitigation for the loss to riparian trees, BIO-4: Riparian Habitat Replacement includes tree replacement at a minimum ratio of 3:1 for permanent impacts and 1:1 for temporary impacts and is essentially the same as CDFW recommends. If CDFW require higher rations for specific species and size, these numbers would be conditioned within the lake and streambed agreement. The strictest of mitigations will be implemented to ensure mitigations and conditions are adequately met. See response to comment B-1 below for additional detail.

Response AA-5

The reviewer (LACO) offers opinions on items within the Cultural Resources chapter 4.5:

In the Cultural Resources section (Section 4.5), further study is required under Mitigation Measure CUL-2 (p.4.5-18) to determine the presence/absence and extent of archaeological resources on the Project site. LACO strongly feels this additional survey should have been conducted prior to releasing the Draft EIR so that impacts could be fully assessed under CEQA.

Mitigation Measure's CUL-2 – CUL-7 are incorporated to account for potential discovery of cultural resources. While further investigation would add a degree of confidence with regard to presence/ absence and extent of cultural resources, based on preliminary investigation they County understands that portions of the Project site are determined to have high site sensitivity. This would not change with the information determined by an Extended Phase One (EP1) investigation and therefore would not change the analysis within the Draft EIR. Implementation of Mitigation Measures CUL-2 through CUL-7 would reduce impacts to archaeological resources to less than significant levels by ensuring the avoidance of archeological resources to the extent feasible, or by identifying, evaluating, and preservation of archaeological resources that may be impacted.

Response AA-6

The reviewer (LACO) offers several opinions on items within the Geology and Soils chapter 4.7:

The beginning paragraph of this section notes that the “data used to inform this section is based in part by a geotechnical investigation for the Project Foundation Type Selection Report” (p.4.7-1). It is unclear if a geotechnical investigation was performed for the proposed Project and if so, how it was incorporated into the impact analysis in this section.

The analysis determines that the impact of liquefaction on Project design is low; however, there is no mention of whether implementation of the Project could exacerbate the liquefaction potential of soils in this area.

Impact GEO-2 additionally notes that conditions of approval would require that bridge designs for construction meet all standard seismic and soil test/compaction requirements; however, it is unclear what the standard seismic and soil test/compaction requirements are and if they have been evaluated for the proposed Project. Without detail on Project-specific requirements, it is unclear what types of construction measures will be required and how they may impact the surrounding area. The conclusions contained in this section would benefit from the findings of an evaluation performed for the specific geological conditions at the Project site.

This section finds that the Project would not result in substantial soil erosion or the loss of topsoil due to adherence to permit requirements and County regulations. This section also references the Hydrology and Water Quality section (Section 4.10) of the Draft EIR. This section would benefit from a discussion of how the relevant regulations specifically relate to the proposed Project, including a list of standard BMPs that may be implemented as part of the Project. This section may benefit from reference to Mitigation Measure BIO-2, which describes the BMPs that will be implemented.

The Project Structure Type Selection Report includes geotechnical analysis, including a Project specific Foundation Type Selection Memo as Appendix C of the report. This report includes the geotechnical investigation data used to inform the analysis.

Implementation of the Project is not anticipated to exacerbate the liquefaction potential of soils in the area. Refer to A-2.2, above for additional details.

Refer to A-2.1 for Seismic and soil test/ compaction requirements the referred to in the Draft EIR. Construction methods are discussed in the Project Description, Section 2.6. For additional details supporting those methods, the Foundation Type Selection Report is available upon request at the Sonoma County Permit and Resource Management Department.

Adherence to the General Construction Permit, Phase I Municipal Separate Storm Sewer System (MS4) (Order R1-2015-0030) will be required for Project implementation.

Reference to Section 4.10.3, Impacts Analysis for hydrology and water quality is sufficient as that section does include details regarding the relevant regulations specific to the Project. Reference to Mitigation Measure BIO-2 has been incorporated, refer to Section 4 below.

Response AA-7

The reviewer (LACO) offers opinions on items within the Greenhouse Gas Chapter 4.8:

The amount of CO₂e that would be generated over the three-year construction period is provided, but the amount is not compared to anything (such as a threshold or the County or State's emissions).

As stated in Section 4.8.3 of the Draft EIR, neither BAAQMD, Caltrans, nor Sonoma County has established significance thresholds related to GHG emissions for construction activities because they are temporary in nature. Therefore, GHG emissions are being reported for informational purposes only.

Response AA-8

The reviewer (LACO) offers several opinions on items within the Hazardous Materials chapter 4.9.

Mitigation Measure HAZ-1 requires the completion of a Phase II Site Assessment prior to construction and recommends specific measures for testing for and abating potential contaminants in the Project area. This mitigation measure, however, appears to lack proper abatement protocol in the event ADL is present. It is recommended that specific requirements for abating ADL, should it be found to be present within the Project area, be added to the mitigation measure.

The analysis contained under Impact HAZ-1 notes that hazardous materials of various types would be needed for construction-related activities and that the storage, handling, use, and disposal of these materials are regulated by County, State, and Federal regulations and that implementation of standard BMPs under the Stormwater Pollution Prevention Plan (SWPPP) would further reduce the potential of accidental release or exposure. The discussion determines that the impact would be less than significant; however, in Section 4.4 (Biological Resources) of the Draft EIR, Mitigation Measure BIO-3 (Accidental Spill and Pollution Prevention Mitigation Measures) is recommended to reduce the potential for chemical spill or contaminant releases into the waterways. This mitigation measure should be included in the significance determination under Impact HAZ-1.

The reviewer offers the opinion that because the existing piers would be cut below grade, approximately three or four feet below river bottom, it is in LACO's professional opinion that potential safety concerns regarding abutments left behind, if any, should be addressed in the Draft EIR. While this reference was included in the Section 4.13 (Noise), it is related to public safety and so included in this discussion related to hazards.

Mitigation Measure HAZ-1 has been updated to include requirements for abatement of ADL, The measure has also been updated to refer back to BIO-3 (Accidental Spill and Pollution Prevention). Refer to Section 4 below.

Abutments left behind is not expected to cause potential safety concerns. While not a direct environmental impact, safety is always prioritized during projects. The upper few feet of the abutments would be demolished and the remaining concrete and embankment in the area would be buried in fill and RS, which would then be vegetated.

Response AA-9

The reviewer (LACO) offers several opinions on items within the Hydrology and Water Quality chapter 4.10

The reviewer offers the opinion that the discussion would benefit from a description of potential site-specific BMPs that will be implemented to deal with Project-specific impacts during construction of the Project. Potential BMPs are provided, but the analysis includes no discussion of how those BMPs will protect water quality. A brief description of each and how it relates to specific project impacts would improve this analysis. Additionally, this section appears to focus primarily on potential impacts to surface water. The Environmental Setting discussion of this section notes that, "according to the project's Preliminary Foundation Design Information Memo (Parikh, 2020), groundwater was observed in the river during drilling in 2019" and "it is assumed that groundwater level is at elevation 5 feet for the Project design" (p.4.10-6). Due to the potential for the Project to encounter groundwater during construction activities, it is important to understand whether BMPs specific to protecting groundwater quality have been considered to be appropriate for this Project and if so, when they will be implemented.

The discussion under Impact HWQ-3 notes that "Prior to leaving the site, the contractor will be required to smooth and regrade disturbed areas to match preconstruction conditions" (p.4.10-18). As any alteration to the conditions of the Project area post-construction may potentially impact the hydrology of the river as it passes through the Project area, LACO believes this should be included as a mitigation measure, or the Draft EIR should include a discussion, with substantial evidence to support it, on why this isn't needed.

Additionally, the reviewer states that while it may not affect the impact determination, the construction-related discussion in this section should discuss the in-water gravel work pads with culverts for water passage that will (temporarily) alter the course of the river. LACO offers the opinion that without a discussion of all impacts of construction that may alter the existing drainage patterns of the site or area, the analysis in this section is insufficient.

While the discussion under Impact HWQ-4 notes that the proposed replacement bridge will be raised to meet the 100-year flood level and will be an improvement over the existing structure during flood events (p.4.10-19), LACO states that this section fails to discuss the alteration of drainage patterns during construction of the Project. This section would benefit from a discussion of whether flood flows would be impeded or redirected during the winter months during which both bridges are present and how, if at all, that would impact the surrounding area.

As this Project will be constructed over a three-year time period, it is possible that the Project area could become inundated during the construction over the winter months. This section should include a discussion of how potential impacts associated with Project inundation during the construction period would be managed.

Site specific BMP's are discussed throughout the document. On page 2-12, the Project description states that the Project is located with the MS4, which requires Low Impact Development features to capture storm water (to not increase runoff rates), and treatment of runoff to limit transfer of pollutants. Standard Construction BMP's used to reduce erosion and minimize sediment from entering the Russian River will be used. Groundwater encountered during drilling will be captured and pumped upslope for disposal on nearby land in a way that would prevent it from flowing back into any waterway or pumped directly into trucks and disposed away from the river. Standard construction BMP's will limit contaminated water from leaving the construction site and requirements to have spill prevention plan will also reduce potential impacts to groundwater. Impacts addressed for HWQ-6, which references various mitigation measures address the reviewer's concerns.

The requirement to smooth and regrade disturbed areas to match preconstruction contours is included within the construction methodology section of the Project Description on page 2.18 of the Draft EIR. This is a standard practice that will be included as part of the construction designs and specifications.

The in-water gravel work pad construction and removal methodology is incorporated into the Project Description on page 2-14 of the Draft EIR. This is a temporary site condition that will only be in place during the low flow dry summer months, and so is not expected to alter any existing drainage patterns. Mitigation Measure BIO-7 (Salmonids and Special-Status Fish Species Mitigation), states that by October 15, the temporary culverts, pipe, and in-stream work pads shall be removed from the channel. The gravel work pad shall be excavated down to the point at which there is a thin veneer remaining on the existing channel bed. Upon removal of the culverts and clean gravel, hand crews may redistribute the remaining gravel such that it does not become a barrier to the free passage of water or the movement of fish and aquatic animals.

The Construction period is temporary in duration and it is not standard practice to analyze temporary structures in the Floodplain analysis. The probability of a 50 or 100 year flood event occurring within the single winter seasons where two structures would be present is extremely low. While construction is ongoing, the site will be winterized prior to the wet season (Oct. 15-May 15). This should ensure construction related materials will not be present during wet weather months and so will not impact adjacent properties if flood conditions occur in the area.

Response AA-10

The reviewer (LACO) offers several opinions on items within the Noise chapter

This section notes the principal noise generator occurring near the Project site would be vehicle traffic on major County roads in the area. Construction noise was estimated in a technical memorandum prepared by AMBIENT Airy Quality & Noise Consulting, for the County in 2021. A copy of this memo was not included for public review with the Draft EIR.

The highest predicted average-hourly noise levels at nearby land uses would range from approximately 63 to 88 decibels A (dBA) Leq (equivalent continuous sound level) (p. 4.13-7). It is important to note these noise levels are significantly higher than the maximum allowable exterior noise exposures for non-transportation noise sources as shown in Table 4.13-4.

In our professional opinion, it doesn't seem appropriate to not include the MRRPD's properties in the list provided, particularly because construction activities near MRRPD beaches will occur during summer months, June to October, when the MRRPD beaches are most highly utilized by the public. This section does not include mitigation measures related to potential noise impacts to MRRPD facilities; however, mitigation measure PS-1, referenced below, attempts to set noise standards to reduce impacts to MRRPD facilities. Given the proposed noise levels provided in this section, the

MRRPD may wish to consider requesting that construction activities that would result in significant noise levels occur when use of MRRPD properties are at their lowest.

Permanent or operational noise associated with the Project would be generated mainly from vehicle traffic on the replacement bridge, and are not expected to increase over existing conditions.

Construction noise would be temporary and occur only during Project construction. Copies of the Construction Noise and Groundborne Vibration Technical Memorandum are available upon request at the Sonoma County Permit and Resource Management Department.

The response to comment A-5 above addressed concerns regarding noise impacts of MRRPS's properties. Construction or demolition-related noise impacts are temporary in nature and would cease once construction is completed.

Response AA-11

The reviewer (LACO) offers several opinions on items within the Public Services and Recreation Chapter 4.14:

The review states that this section does not explain what the estimated response time would be during construction. It's stated that in the event of temporary closure due to public safety concerns, mitigation measures are listed in Section 4.16 (Transportation and Traffic), specifically mitigation measures TRA-1 and TRA-2, that will ensure minimal impact on emergency service response times.

Additionally, the County and its multijurisdictional partners are currently preparing an updated hazard mitigation plan and the Draft EIR notes the Public Review Draft was published in July 2021 (p. 4.15-6). Due to the passage of time since the Public Review Draft was published, the status of this document should be updated in the Draft EIR.

It is unclear when during the three-year construction period access to the beach and river areas would be limited, what parking at the Big Rocky Beach parking area would remain open during construction, and when traffic is expected to be temporarily restricted to a single lane. LACO believes that more information should be provided so that these details can be better understood.

The period during which the Big Rocky and Sandy Beaches are to be temporarily used should be disclosed. It is noted that a traffic control flagger may be provided where public access and construction staging areas converge, as necessary (p. 4.15-12). In our professional opinion, this sentence should read "shall be provided..." rather than "may be provided".

Access to Dutch Bill Creek Beach via the unimproved access road/pedestrian path would also be restricted during the first and second years of construction, but open during the third year of construction. Following construction, the pathway would be resurfaced, reducing erosion and sedimentation, and providing improved access for maintenance vehicles accessing the south side of the beach and river (p. 4.15-12). The section should note that this unimproved access road/pedestrian pathway at Dutch Bill Creek Beach serves as an ADA vehicular access point. Currently, persons with disabilities are able to request a key (or lock combination) at the MRRPD office in order to gain access to the locked gate and drive a vehicle with a boat trailer to the upstream side of the riffle. ADA access for fishing downstream of the riffle is via the existing ADA parking area adjacent to the existing boat launch.

This section should address how this service will be provided during construction, and if any impacts are anticipated. In addition, clarification should be provided as to whether the pathway would be used during the third year of construction. If not, explanation as to why the pathway would not be resurfaced during the third year should be provided as well as how long resurfacing would take.

The section notes that "recreational use of the river would be improved by removal of the existing bridge piers from the river channel post-construction" (p. 4.15-13). It is our professional opinion that this conclusion is reached while providing little to no justification.

County would provide for at least 100-percent replacement of parking throughout the construction period. (p. 4.15-13). It is our interpretation that the County may replace more than 100-percent of the

parking throughout the construction period. The proposed replacement parking should be provided and the impact to the replacement parking area should be discussed as well. The section also mentions that the Big Rocky Beach Parking lot supports an estimated 106 standard parking spaces though they are not delineated. During the first and second summer construction seasons, the Big Rocky Beach parking area east of the existing bridge would be available for parking. During the third summer construction season, a portion of the Big Rocky Beach parking area east of the existing bridge would be unavailable due to the removal of the existing bridge and parking would be reduced to an estimated 70 parking spaces (p. 4. 15-13). An explanation of where this estimate came from should be provided.

Big Rocky Beach parking area would be temporarily affected while parking areas adjacent to the Monte Rio Community Center would not. The off-sets for temporary parking impacts during construction for CDFW would also off-set temporary parking impacts for MRRPD (p. 4. 15-15). In addition, the benefits and/or how accurate a review of parking demand during the off season should be discussed.

The Draft EIR lacks discussion of what, if anything, will be done to the existing deep scour pools and the holes resulting from the existing piers. This discussion should mention whether these will be remediated/corrected, left as-is, etc.

Regarding the post construction improvements of the existing path to Dutch Bill Creek being mutually agreed upon by both the County and MRRPD, This is an important measure that requires input from the MRRPD for implementation.

It was previously mentioned in this section that the bridge would provide better access to the beaches and improve water recreational opportunities as well as fisheries habitat. It is our professional opinion that additional justification for this determination is needed.

TRA-1 and TRA-3 provide measures requiring the contractor to provide passage of vehicles through the Project site at all times. In the event of complete bridge closure, The County will require the contractor to notify Emergency Services of planned closures and provide a working phone number so that Emergency Services may call ahead to request re-opening. The existing bridge will remain in use throughout construction of the replacement bridge. The replacement bridge will be open to traffic prior to removal of the old structure. During Project construction, emergency vehicles may need to stop temporarily or slow in order to ensure that they can safely pass through the Project area, Emergency response times are not expected to change significantly

The status of the County Hazard Mitigation Plan has been updated to reflect the current status. See Section 4 below for details.

Beach access to Big Rocky and Sandy Beaches will remain open throughout construction. At times portions of these beach will be fenced off for public safety reasons, as shown in the 35 percent design plans. Access to Dutch Bill Creek Beach via the existing unimproved pathway will be prohibited or limited during certain periods of constructions, as discussed in the Project description and shown in the 35% design plans. While the existing unimproved pathway to Dutch Bill Creek Beach provides access for emergency and other vehicles wanting access to the river area upstream of the riffle (including vehicle access for people with disabilities), access (including ADA access and ADA parking), will remain open throughout the entirety of Project construction at the Monte Rio Fishing Access boat ramp on the north side of the River.

The limited access to beach areas will be temporary during the construction seasons. Following construction, the Dutch Bill Creek Beach path will be resurfaced, improving access. Post construction beach use Big Rocky, Sandy and Dutch Bill Creek Beaches would be similar or improved compared to existing conditions.

Response AA-12

The reviewer (LACO) offers several opinions on items within the Transportation Chapter 4.16:

Although the Project would not exceed available capacity, as to how construction would affect the current route is not discussed.

The discussion under Impact TRA-2 notes that the Project will not increase hazards due to geometric design features, or incompatible uses and the primary purpose of the Project is to replace the current seismically at-risk bridge with a new bridge that is up to current safety design standards; therefore, a less-than-significant impact would occur (p. 4.16-7). Although valid, this does not directly address the impact statement. The section continues to discuss the most recent Caltrans Bridge Inspection Report which mentions a list of deficiencies observed (p. 4.16-7). All of the deficiencies were addressed later in the section except for the following: "Geotechnical analysis indicates that the south side in particular is prone to liquefaction of multiple layers within the upper 100 feet of the ground surface. On the north side, several potentially liquefiable layers were encountered within the upper 35 feet of the ground surface" (p. 4.16-7).

It LACO's our professional opinion that this deficiency should be addressed as well. Please refer to the discussion of Section 4.7 of the Draft EIR (Geology and Soils) for additional discussion of concerns related to the potential for liquefaction at the Project site.

It is LACO's professional opinion that the mitigation measure appears sufficient if staging on the easterly approach will provide enough room for emergency vehicles to pass through. We believe a meeting with emergency services to confirm the proposed plans are adequate should be required prior to notification of the Project's construction schedule.

Impact discussion TRA-1, explains how traffic on the existing route may be affected during construction. A Traffic Control Plan will be developed by the selected contractor that required review and approval of the County.

Liquefaction is discussed in Section 2.3, purpose and need as well as Section 4.7.3, Impact GEO-2.

Staging areas are not anticipated to interfere with emergency services. Page 4.9-13, Impact HAZ-4 states that as part of the required Traffic Control Plan notifications to all emergency service providers will occur prior to construction, as well as coordination in the event of temporary closure bridge closure.

Response AA-13

The reviewer (LACO) offers opinions on items within the Appendices of the Draft EIR

As noted above, only one appendix (Appendix A – 35% Design Plans) is provided on the County's website for review. While the studies and particular documents are noted and summarized throughout the Draft EIR, it is typically standard practice to include copies of studies referenced throughout the Draft EIR as appendices (except for studies or documents that are of a confidential nature), for readers to be able to reference and review.

All reference materials are available upon request at the Sonoma County Permit and Resource Management Department.

Letter B

COMMENTER: Erin Chappell, Regional Manager Bay Delta Region State of CA Dept. of Fish and Wildlife

DATE: May 27, 2022

Response B-1

The commenter asserts that Mitigation Measure (MM) BIO-4 may not reduce impacts to riparian habitat to less-than-significant. Additionally, the Project may result in a violation of Fish and Game Code section 1600 et seq. because the draft EIR does not require Sonoma County to submit an LSA Notification to CDFW and comply with the related LSA (Lake and Streambed Alteration) Agreement, if issued, prior to Project construction.

Section 4.4, pages 40-41, The EIR prescribes mitigation for the loss to riparian trees, BIO-4: Riparian Habitat Replacement includes tree replacement at a minimum ratio of 3:1 for permanent impacts and 1:1 for temporary impacts and is essentially the same as CDFW recommends. In addition, section 4.4, page 26 lists Fish and Game Code 1600-1602 states specifically that CFGC requires that a Notification of Lake or Streambed Alteration be prepared for “any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake.” In short, Sonoma County will acquire a 1602 Lake and Streambed Agreement for this bridge replacement Project and will follow the riparian tree replacement mitigation contained in the DEIR.

Response B-2

The Commenter suggests that the Project may result in impacts to coho salmon including take in the form of catch, capture, or mortality and a violation of CESA.

Section 4.4, pages 16, 17, 33, 34, 41. Sonoma County has prepared and submitted a Biological Assessment (BA) of potential effects of the proposed Project activities on the species including Coho salmon. Based on the BA, and coordination with the County and Caltrans, NOAA Fisheries issued a Biological Opinion in January 2022 for the proposed bridge replacement. Project coordination with CDFW is discussed in the Project Description on page 2-16 of the Draft EIR. The County will submit application for Lake and Streambed Alteration (LSA) Agreement once the project advances to final design. CDFW will review the application, and at that point may request the County to prepare a CESA ITP for Coho salmon. Coordination between the County and CDFW is ongoing, and CESA authorization for the potential take of Coho salmon would occur prior to initiation of Project construction activities.

Response B-3

The commenter suggests that the proposed Project could result in impacts to nesting NSO including mortality of young and a violation of CESA.

Section 4.4, page 44-45. Issue: MM BIO-10 may not reduce impacts to northern spotted owl (NSO) to less-than- significant.

There is no suitable Northern Spotted Owl (NSO) habitat within the Project footprint. Further, replacement of the existing bridge is not a NSO habitat alteration project. Most of coastal northwestern California including the Monte Rio area has experienced high levels of historical logging, mainly in the form of large clear-cuts, which has resulted in younger forests. The Project

footprint and adjacent areas are relatively open areas that have been developed and maintained for seasonal recreation that includes mostly open beaches and willow scrub. Northern Spotted Owls are heat-intolerant and select cool summer roost sites to help them to thermoregulate (Barrows 1981). Therefore, significantly higher summer temperatures and compared to locations within intact coastal forests found elsewhere and as compared to the relatively high summer temperatures found within the Project area. Since that is the case, and due to the fact that the Project is located with the town of Monte Rio, with a moderate to high summer level of traffic and human activity, NSO would not be expected to nest within the immediate vicinity of the Project and would not be expected to be impacted by Project activities. While we believe that the project is highly unlikely to affect NSO, the County will follow the CDFW suggested recommendations and best management practice as follows:

No Project activities within 0.25 miles of NSO nesting habitat shall occur from March 15 to August 31, unless NSO surveys have been completed by a qualified biologist following the USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls, dated (revised) January 9, 2012 and the survey report is accepted by CDFW in writing.

If breeding northern spotted owls are detected during surveys, a 0.25-mile no-disturbance buffer zone shall be implemented around the nest. NSO surveys shall be conducted for each year Project construction occurs. No Project activities shall occur within the buffer zone until the end of breeding season, or a qualified biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. Alternate buffer zones may be proposed by a qualified biologist after conducting an auditory and visual disturbance analysis following the USFWS guidance, Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW.

Survey results shall be provided to the Spotted Owl Observations Database at <https://wildlife.ca.gov/Data/CNDDDB/Spotted-Owl-Info>). If NSO are detected, CDFW and the USFWS shall be immediately notified. If Project activities may impact NSO, the Project shall apply for and obtain an ITP from CDFW, as well as authorization from the USFWS, before starting Project activities.

Letter C

COMMENTER: Ed Fortner, General Manager, Sweetwater Springs Water District

DATE: April 11, 2022

Response C-1

The commenter notes that the EIR describes the Sweetwater Springs Water District as a privately owned water district and points out the fact that Sweetwater Springs Water District is in fact a Public Water District with a duly elected Board of Directors.

Comment acknowledged. The Draft EIR has been updated, the change is reflected in the errata document in Chapter 4 below. Page 1-4 of the DEIR has been revised.

Response C-2

The commenter notes that the District has been making informal and formal information request to the County looking for any agreement between the County and the District relate to the Bridge and the water main attached.

Comment acknowledged. Page 1-4 of the DEIR has been revised.

Response C-3

The commenter notes that the DEIR has the Sonoma General Plan Goal PF-1 gives “highest priority for water and sewer improvements... including Monte Rio/ Sweetwater Springs”. Commenter states “I hope this means that the County will share significant funding for our water main attached to the new bridge.”

Comment noted. This comment does not address the adequacy of the DEIR; therefore, no further response is required.

Letter D

COMMENTER: Justin Newell, Land Agent, Pacific Gas and Electric

DATE: April 8, 2022

Response D-1

The commenter provides acknowledgement of receipt of the Notice of Availability of the Draft EIR. The commenter ask about potential conflicts between the Project and PG&E facilities and requested a plan set for the replacement bridge.

This comment is noted

Response D-1

The commenter ask about potential conflicts between the Project and PG&E facilities and requested a plan set for the replacement bridge.

The Project will require utility relocation including PG&E overhead electricity and that the County Engineering Project Manager has been coordinating with PG&E representative and will continue to work with PG&E on utility coordination, including potential relocation, throughout the next Federal project phase, Right of Way. The Project would comply with PG&E's construction requirements as appropriate.

Letter E

COMMENTER: Brenda Adelman

DATE: April 6, 2022

Response E-1

The commenter notes to have received the NOA and requests the website link to view the DEIR to be sent via email.

Comment is noted and a link to the Sonoma County Environmental Documents web address was forwarded where commenter can find the DEIR.

Response E-2

The commenter notes that it would be a good idea to advertise in the Gazette (locally affiliated newspaper) and to post notices beyond the communities of Monte Rio and Villa Grande, as the bridge is used area wide and not just by the local community.

The County looked into posting in the Gazette, but we were informed that it was sold to Sonoma Media LLC and the Gazette can no longer publish Public Notices since they are not an adjudicated newspaper. The Project was posted to the Press Democrat (regional newspaper) on Monday 4/4/22, which has a reach beyond the communities of Monte Rio and Villa Grande. As for site posting notification, that was completed per the CEQA guidelines.

Letter F

COMMENTER: Christmas Leubrie

DATE: April 7, 2022

Response F-1

The commenter states an opinion that the County was dishonest in previous public meetings. She states that the County told the group that the existing bridge could not be saved because the new bridge needed to be built within the footprint of the existing structure. With the proposed design analyzed in the DEIR, the commenter states that the existing bridge should be retained for pedestrian and bicycle use as was done for the Guerneville Bridge upstream of the Project.

Section 1.4, page 1-3, Although this comment does not pertain to the analysis or conclusions of the EIR, the comment is noted and will be forwarded to the decision makers for their consideration. Commenter did not provide the dates of public meetings described in the comment. The County Department of Transportation and Public Works has engaged in early coordination and public involvement that took place, starting with community input meetings in 2017. Community engagement was conducted through workshops at the Monte Rio Recreational Park District Community Center, and through web based surveys and virtual Zoom meetings. These meetings allowed for the County Department of Transportation and Public Works (DTPW) to educate the community about the Project history, existing bridge condition based on Caltrans Inspection Reports, available funding, feasibility of replacement vs retrofit, etc. The Community helped DTPW understand local priorities such as how the current structure is utilized, favorable alignments locations, design features and aesthetics for a replacement structure.

Response F-2

The commenter states an opinion that the County has designed a structure that is “huge, over designed, and extremely wide. Retaining the old bridge would allow for a smaller bridge to be used by cars, thus saving considerable funds. The commenter ask that the “Project go back to the drawing boards to rectify the wildly unnecessary overengineering of the new purposed vehicle bridge.”

The Project as described meets current ASHTO design standards for highway bridges, which is a requirement when receiving Federal funding to complete a Federal Highways Administration (FHWA)/ California Department of Transportation Local Assistance Highway Bridge Program designated bridge Project.

Letter G

COMMENTER: Steve Loving

DATE: April 4, 2022

Response G-1

The commenter asks a question about the Project's impacts on the mouth of Dutch Bill Creek.

The Project has been designed to minimize permanent impacts to Dutch Bill Creek. While the pier/bent 4 of the bridge will encroach the bank of Dutch Bill, it will be located outside the low flow and above of the "ordinary high water" elevation. A temporary work pad will be used in construction season two, that will impact the mouth of Dutch Bill. Clean river run gravels will be used to minimize impacts to water quality. Mitigation measures have been incorporated to ensure fish passage remains open throughout construction via culverts sized to ensure flows are adequate for fish movement up and down stream. The gravel pad(s) will be removed at the end of each construction season, prior to the peak migration period for salmon. Dutch Bill Creek will be restored to pre-project conditions prior contractor leaving the site.

Additionally, the County has been working with NOAA Fisheries, and as a condition of the Project Biological Opinion, the County will provide funding for a restoration project in Dutch Bill Creek to be implemented by a local conservation agency. This will likely include enhancement of fisheries habitat upstream of the Project.

4 Revisions to the Draft EIR

Chapter 4 presents specific changes to the text of the Draft EIR that are being made in response to comments received or to make corrections. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

Page ES-10 of the Draft EIR is revised as follows:

- ~~Where feasible~~, Equipment and hazardous materials shall be stored at least 50 ft. away from water features
- ~~When feasible~~, equipment operating below the top of bank shall use non-toxic vegetable oil or similar non-toxic alternative for operating hydraulic equipment opposed to traditional hydraulic fluids that can contain a wide range of chemical compounds.

Page ES-10 of the Draft EIR is revised as follows:

- The contractor shall develop and implement site-specific BMPs, a Storm Water Pollution Prevention Plan (SWPPP), ~~water pollution control plan~~, and emergency spill control plan. The contractor shall be responsible for immediate containment and removal of any toxins released.

Page ES-13 of the Draft EIR is revised as follows:

- A qualified botanist will conduct rare plant surveys within the construction area, as needed. Surveys would be conducted during the appropriate blooming period in the year prior to construction for species with potential to be in the construction area, ~~to the extent feasible~~. If any special-status plant species, is found during pre-construction surveys, high visibility ESA protective fencing would be installed around the special-status plants to prevent construction staff or equipment from entering this area, ~~to the maximum extent feasible~~. The ESA protective fencing buffer would be species specific, with a minimum buffer radius based on the guidance from a qualified biologist. The biological monitor would be responsible for directing the implementation of additional avoidance measures, as needed.

Page ES-15 of the Draft EIR is revised as follows:

- ~~To the maximum extent feasible, all of the interstitial spaces of the RSP will be buried below grade to allow for revegetation.~~
- A NMFS /CDFW approved biologist would walk in and/or adjacent to the Russian River, ~~as feasible,~~ alongside equipment to minimize/avoid fish entrapment during gravel work pad installation. The biologist would have the authority to pause work to allow fish to navigate away from the site, or to investigate the gravel work pad for potential entrapment. The biologist would implement safe monitoring practices by remaining visible to the operator at all times, maintaining a safe distance from equipment (to be established using standard safety protocols and in coordination with the operator), and remain in constant communication with the operator during work.

Page ES-18 of the Draft EIR is revised as follows:

- Trimming and removal of vegetation and trees would be minimized and performed outside of the nesting season, after August 31 and before February 15, ~~to the extent feasible~~ when bird nesting is most likely avoided unless a qualified biologist has inspected the site and determined that the tree removal or trimming will not affect nesting birds.
- In the event construction work, including trimming or removal of vegetation and trees, must be conducted during the nesting season (February 15 to August 31), nesting bird surveys would be completed ~~within 500 feet of the construction area, as feasible,~~ by a qualified biologist no more than 72 hours prior to trimming or clearing activities to determine if nesting birds are within the vegetation that would be trimmed or removed. Nesting bird surveys would be repeated if trimming or removal activities are suspended for five days or more.

Page ES-22 of the Draft EIR is revised as follows:

- Avoidance and protection of any wetlands, ~~to the maximum extent feasible~~ and use of construction fencing to identify potential wetland areas as “environmental sensitive areas” to be excluded from construction activities

Page ES-41 of the Draft EIR is revised as follows:

- Following construction, the Monte Rio Fishing Access parking area would be reconfigured, repaved and restriped in coordination with MRRPD and CDFW. Proposed plans

include the construction of a retaining wall to allow for reconfiguration. In addition, improvements to the Monte Rio Fishing Access parking area drainage system ~~may will~~ be incorporated into the Project as part of the Project's Low-impact Development (LID) water treatment plans, ~~as~~ feasible.

Page ES-42 of the Draft EIR is revised as follows:

- Construction activities, excluding activities required to occur without interruption or activities that would pose a significant safety risk to workers or citizens, or in the event of an emergency, shall be limited to between the daytime hours of 7:00 a.m. and 7:00 p.m. No work would be allowed on holidays. Weekend work would only be authorized by the County for select activities on a case by-case basis and occur ~~may be allowed, on a limited basis, with prior approval from the Department of Transportation and Public Works,~~ during the hours of 9:00 a.m. and 5:00 p.m.

Page ES-42 of the Draft EIR is revised as follows:

- The County shall notify property owners ~~along Geysers Road~~ at least 7 days in advance of the proposed temporary closure. Signage shall be placed ~~at both ends of Geysers road~~ notifying motorists of the planned closure. A working jobsite telephone number must be available and provided to Emergency Services during any bridge or approach roadway closures so they may call ahead to request re-opening. Any bridge or approach roadway closures must be re-opened within 10 minutes for emergency vehicles, or within 30 minutes for non-emergency vehicles.

Page 1-4 of the Draft EIR is revised as follows:

See Section 4.18, Utilities and Service Systems, for details regarding water and wastewater capacity.

Comment noted. ~~The comment does not pertain to the scope of the EIR. It will be considered by the decision makers prior to a decision on the project.~~

Sweetwater springs is a ~~privately~~ public owned water district, ~~and they have entered into an agreement with the County for the use of the County's bridge to carry their facilities. The County is abiding by all terms of the agreement. The costs will be borne by the appropriate parties as indicated by the agreement.~~ The County is coordinating with Sweetwater springs to provide any information they need to plan for the

relocation, and the project is being conducted in a manner to insure continued operation of their water system

Page 2-17 of the Draft EIR is revised as follows:

The southern abutment would remain in place and the top few feet of the abutment wall and wingwalls would be removed to reduce loading and to hide the old abutment. The face of the abutment would then be buried under fill and RSP; the RSP may be buried or partially buried. ~~If feasible, a~~ As natural light allows, RSP would be planted with vegetation. The southern approach to the existing bridge structure may be revegetated. It is estimated that the area of the RSP would be approximately 30-feet wide by 120-feet long under both options.

Page 4.1-21 of the Draft EIR is revised as follows:

There would be no permanent new sources of glare as a result of the project. Bridge paint will be non-reflective, and the signage used would be standard retro-reflective to ensure light returns to where it came and nowhere else.

Page 4.1-21 of the Draft EIR is revised as follows:

- Vegetation removal would be minimized ~~to the extent feasible~~. Vegetated areas temporarily disturbed by the project would be restored following project construction using a context sensitive design that is visually compatible with the surrounding landscape and consistent with existing policy regarding wetlands protection and buffers.

Page 4.3--14 of the Draft EIR is revised as follows:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity ~~when feasible~~.

Page 4.4-34 of the Draft EIR is revised as follows:

Construction materials, dust, and debris could result in temporary direct impacts on Coho salmon, steelhead, and Chinook salmon designated critical habitat waters and Essential Fish Habitat (EFH) for Coho and Chinook if materials were to enter flowing water within the Russian River or Dutch Bill Creek during bridge construction, bridge removal, and bank and channel re-establishment efforts. In addition, installation of a temporary water diversion in the Russian River (and potentially at the mouth of Dutch Bill Creek, if water is present), and removal of the existing

bridge piers and pre-1934 remnant bridge pier footing, could result in temporary direct impacts to the riverbed. The existing bridge piers would be wholly or partially removed, potentially cut approximately four feet below grade, which could result in temporary indirect impacts on Coho salmon, steelhead, and Chinook salmon critical habitat. In addition, temporary indirect impacts on Coho salmon and steelhead critical habitat include the removal of overhanging vegetation along the banks of Dutch Bill Creek and installation of a bridge pier on the western bank of Dutch Bill Creek outside of the low flow channel. After construction, the Russian River and Dutch Bill Creek channels would be restored to previous contours, ~~to the extent feasible.~~

Page 4.4-36 of the Draft EIR is revised as follows:

Birds

Special-status bird species that have the potential to occur within the BSA include great blue heron, bald eagle, yellow-breasted chat, osprey, double-crested cormorant. With the exception of yellow-breasted chat, habitat for the special-status bird species listed above is limited to foraging only; there is no potential nesting habitat for great blue herons, bald eagle, osprey or double-crested cormorant. However, there is potential nesting and foraging habitat for common bird species protected by migratory birds protected under the federal Migratory Bird Treaty Act, including cliff swallows, which are known to nest under the existing bridge.

Construction of the new bridge and demolition of the existing bridge could result in temporary and permanent impacts on special-status bird species, should they be in the construction area.

Construction activities such as vegetation removal and work on the bridge structure, including structure demolition, could directly impact migratory birds and raptors if these activities are conducted while birds are nesting within or adjacent to the affected areas. Temporary noise generating activities, bridge demolition, and road construction, could result in temporary indirect impacts on nesting birds and raptors if loud enough to result in disturbance. In addition, construction activities could temporarily disrupt foraging in the construction area.

The new bridge and roadway approaches could result in permanent loss of riparian habitat, which may provide potential nesting and foraging habitat for special-status birds. This permanent loss of habitat could result in indirect impacts on special-status bird species. However, with implementation of the proposed avoidance and minimization measures listed below, potential impacts would be less than significant. These include Measure **BIO-1** (General Mitigation Measures); **BIO-4** (Riparian Habitat Replacement); **BIO-9** (Mitigation for Bats); **BIO-10** (Mitigation for Migratory Birds); **BIO-10** (Mitigation for Special-Status and Migratory Birds); and **BIO-12** (Sensitive Natural Communities).

There is no suitable Northern Spotted Owl (NSO) (*Strix occidentalis caurina*) habitat within the Project footprint. Further, replacement of the existing bridge is not a NSO habitat alteration project. Most of coastal

northwestern California including the Monte Rio area has experienced high levels of historical logging, mainly in the form of large clear-cuts, which has resulted in younger forests. The Project footprint and adjacent areas are relatively open areas that have been developed and maintained for seasonal recreation that includes mostly open beaches and willow scrub. Northern Spotted Owls are heat-intolerant and select cool summer roost sites to help them to thermoregulate (Barrows 1981). Therefore, significantly higher summer temperatures and compared to locations within intact coastal forests found elsewhere and as compared to the relatively high summer temperatures found within the Project area. Since that is the case, and due to the fact that the Project is located with the town of Monte Rio, with a moderate to high summer level of traffic and human activity, NSO would not be expected to nest within the in the immediate vicinity of the Project and would not be expected to be impacted by Project activities. While we believe that the project is highly unlikely to affect NSO, the County will follow the CDFW suggested recommendations and best management practice as follows:

No Project activities within 0.25 miles of NSO nesting habitat shall occur from March 15 to August 31, unless NSO surveys have been completed by a qualified biologist following the USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls, dated (revised) January 9, 2012 and the survey report is accepted by CDFW in writing.

If breeding northern spotted owls are detected during surveys, a 0.25-mile no-disturbance buffer zone shall be implemented around the nest. NSO surveys shall be conducted for each year Project construction occurs. No Project activities shall occur within the buffer zone until the end of breeding season, or a qualified biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. Alternate buffer zones may be proposed by a qualified biologist after conducting an auditory and visual disturbance analysis following the USFWS guidance, Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW.

Survey results shall be provided to the Spotted Owl Observations Database at <https://wildlife.ca.gov/Data/CNDDDB/Spotted-Owl-Info>. If NSO are detected, CDFW and the USFWS shall be immediately notified. If Project activities may impact NSO, the Project shall apply for and obtain an ITP from CDFW, as well as authorization from the USFWS, before starting Project activities.

With implementation of these measures, any potential impacts to ~~bats~~ birds would be less than significant.

Page 4.4-34 of the Draft EIR is revised as follows:

- ~~When feasible,~~ equipment operating below the top of bank

shall use non-toxic vegetable oil or similar non-toxic alternative for operating hydraulic equipment opposed to traditional hydraulic fluids that can contain a wide range of chemical compounds.

Page 4.4-39 of the Draft EIR is revised as follows:

- ~~When feasible~~, Equipment operating below the top of bank shall use non-toxic vegetable oil or similar non-toxic alternative for operating hydraulic equipment opposed to traditional hydraulic fluids that can contain a wide range of chemical compounds.

Page 4.4-40 of the Draft EIR is revised as follows:

- The contractor shall develop and implement site-specific BMPs, a Storm Water Pollution Prevention Plan (SWPPP), ~~water pollution control plan~~, and emergency spill control plan. The contractor shall be responsible for immediate containment and removal of any toxins released.

Page 4.4-41 of the Draft EIR is revised as follows:

- ~~When feasible~~, Riparian vegetation will be trimmed rather than removed outright and/or be cut at grade to allow for stump re-sprouting.

Page 4.4-40 of the Draft EIR is revised as follows:

- A qualified botanist will conduct rare plant surveys within the construction area, as needed. Surveys would be conducted during the appropriate blooming period in the year prior to construction for species with potential to be in the construction area, ~~to the extent feasible~~. If any special-status plant species, is found during pre-construction surveys, high visibility ESA protective fencing would be installed around the special-status plants to prevent construction staff or equipment from entering this area, ~~to the maximum extent feasible~~. The ESA protective fencing buffer would be species specific, with a minimum buffer radius based on the guidance from a qualified biologist. The biological monitor would be responsible for directing the implementation of additional avoidance measures, as needed.

Page 4.4-42 of the Draft EIR is revised as follows:

- ~~To the maximum extent feasible, all of~~ The interstitial spaces of the RSP will be buried below grade to allow for revegetation.
- A NMFS /CDFW approved biologist would walk in and/or adjacent to the Russian River, ~~as feasible~~, alongside

equipment to minimize/avoid fish entrapment during gravel work pad installation. The biologist would have the authority to pause work to allow fish to navigate away from the site, or to investigate the gravel work pad for potential entrapment. The biologist would implement safe monitoring practices by remaining visible to the operator at all times, maintaining a safe distance from equipment (to be established using standard safety protocols and in coordination with the operator), and remain in constant communication with the operator during work.

Page 4.4-44 of the Draft EIR is revised as follows:

- Trimming and removal of vegetation and trees would be minimized and performed outside of the nesting season, after August 31 and before February 15, ~~to the extent feasible~~ when bird nesting is most likely avoided unless a qualified biologist has inspected the site and determined that the tree removal or trimming will not affect nesting birds.
- In the event construction work, including trimming or removal of vegetation and trees, must be conducted during the nesting season (February 15 to August 31), nesting bird surveys would be completed ~~within 500 feet of the construction area, as feasible~~, by a qualified biologist no more than 72 hours prior to trimming or clearing activities to determine if nesting birds are within the vegetation that would be trimmed or removed. Nesting bird surveys would be repeated if trimming or removal activities are suspended for five days or more.

Page 4.4-52 of the Draft EIR is revised as follows:

- Avoidance and protection of any wetlands, ~~to the maximum extent feasible~~ and use of construction fencing to identify potential wetland areas as “environmental sensitive areas” to be excluded from construction activities

Page 4.7-1 of the Draft EIR is revised as follows:

This section evaluates the potential impacts relating to geology and soils impacts associated with implementation of the proposed project. The data used to inform this section is based in part by geotechnical investigation for the Project Structure Type Selection and Foundation Type Selection Reports.

Page 4.7-10 of the Draft EIR is revised as follows:

Objective PS-1.3: Use the Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021 to help reduce future damage from geologic hazards.

Page 4.7-11 of the Draft EIR is revised as follows:

The Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021, updated ~~April 2017~~ October 2021, assesses the County's vulnerabilities to various hazards and presents mitigation strategy, including goals, objectives, and actions that the County will strive to implement over the next five years. These hazards include earthquakes and landslides. The hazard mitigation plan seeks to identify opportunities for reasonable mitigation actions and sets out a five-year implementation plan. For example, some identified actions to reduce seismic hazards includes County building evaluation and retrofits, implementation of the earthquake resistant bracing system program, and retrofit of bridges throughout the County.

Page 4.9-8 of the Draft EIR is revised as follows:

Sonoma County Multijurisdictional Operational Area Hazard Mitigation Plan Update 2021

The Sonoma County Multijurisdictional ~~Operational Area~~ Hazard Mitigation Plan Update (MJHMPU) 2021 assesses the County's vulnerabilities to various hazards and presents mitigation strategy, including goals, objectives, and actions that the County will strive to implement over the next five years. These mitigation actions are intended to reduce the disruption or loss of life, property, and economy that might result from a natural disaster. The hazard and risk assessment focuses on earthquake, flood, wildland fire, and landslide hazards, as these are considered to constitute the greatest risk to the County based on past disaster events, future probabilities, and degree of vulnerability. The ~~2016 update to this plan~~ MJHMPU includes climate change related implications on hazard trends, including sea level rise and drought (County of Sonoma 2021).

Page 4.15-6 of the Draft EIR is revised as follows:

Sonoma County prepared a hazard mitigation plan in compliance with the DMA in 2006 and has updated the plan every five years since then, most recently in ~~2016~~ 2021. ~~The County and its multijurisdictional partners are currently preparing an updated hazard mitigation plan.~~ The Public Review Draft of the Sonoma County Multijurisdictional Hazard Mitigation Plan Update (MJHMPU) 2021 was published in July 2021. Based on review comments, the MJHMPU was revised in October

2021 and adopted by the Sonoma County Board of Supervisors on December 7, 2021. Final approval was provided by FEMA on December 14, 2021.

Page 4.15-2 of the Draft EIR, Table 4.15-1, is revised as follows:

Table 4.15-1 Enrollment Data

School	Enrollment Data (2018-19) Projected Enrollment (2028-29)	
<u>Guerneville Elementary Monte Rio Elementary School</u>	<u>1,241-87</u>	<u>1,241-87</u>
West Sonoma County Union High	1,933	1,638

Page 4.15-3 of the Draft EIR is revised as follows:

Monte Rio Recreational Park District

Park and recreation facilities adjacent to the project site include the beaches and parking lots that are primarily owned and maintained by the Monte Rio Recreational Park District (MRRPD), including MRRPD’s Big Rocky, Sandy and Dutch Bill Creek beaches.

A public fishing access area known as the Monte Rio Fishing Access supports a boat ramp, restrooms and parking area adjacent to the existing bridge and is included in this evaluation. The Monte Rio Fishing Access improvements are located on two parcels, one is owned by the California Department and Fish and Wildlife (CDFW), and the other owned by MRRPD. The Monte Rio Fishing Access is maintained and operated by MRRPD under a joint CDFW and MRRPD operating agreement.

The MRRPD district boundaries encompasses an area of approximately 3.5 square miles and extend approximately along a two mile reach stretch of the Russian River, with the existing Bohemian Highway Bridge bisecting many of the MRRPD properties.

Page 4.15-4 of the Draft EIR is revised as follows:

Dutch Bill Creek Beach (APN 095-160-001) is located on the south side of the Russian River.

Page 4.15-5 of the Draft EIR is revised as follows:

- **River Boulevard and Main Street Sites** – The River Boulevard and Main Street Site is composed of ~~two~~ three unimproved parcels on the south end of the bridge, ~~one~~ two

on the east side (APN 095-170-020, 095-170-021) and one on the west (APN 095-160-007). The site is publicly accessible from River Boulevard by pedestrians and there are foot trails leading to the river and Dutch Bill Creek. There is a gated driveway entrance that is open for vehicle access and parking during large MRRPD events. ~~The Properties currently have no specified use, however there are~~ MRRPD has conceptual plans to develop this site as a future camping area, with campsites accessible by boat, bikes, vehicles and on-foot via a connection with the conceptual plans for a Dutch Bill Creek Trail continuation. Additional amenities proposed include day use picnic areas and park shelter.

Access to Dutch Bill Creek Beach on the south side of the bridge is through an unimproved footpath next to Noel's Automotive on Main Street. This access is also used for emergency vehicles to reach the beach and has in the past been available to anglers interested in vehicular boat trailer access to the upstream side of the river riffle.

Upon County request for estimated number of beach users, MRRPD provided the County with its most recent records of boat rentals (MRRPD, 2021 and 2022). During the 2021 summer season, there were approximately 1,696 boat rentals. This is slightly less than 2019, pre-Covid, when boat rentals were 1,758 (MRRPD, 2022). ~~Upon County request for estimated number of beach users, MRRPD provided the County with its most recent (2019) records of boat rentals (MRRPD, 2021). During the 2019 summer season, there were approximately 1,758 boat rentals.~~ However, since many visitors use the beach without renting boats, and one boat rental may be for more than one person, it is estimated that beach use is higher than boat rental records show, especially during holiday weekends and for special community events and gatherings such as Fourth of July when there are large crowds.

Page 4.15-6 of the Draft EIR is revised as follows:

Sonoma County prepared a hazard mitigation plan in compliance with the DMA in 2006 and has updated the plan every five years since then, most recently in ~~2016~~ 2021. ~~The County and its multijurisdictional partners are currently preparing an updated hazard mitigation plan.~~ The Public Review Draft of the Sonoma County Multijurisdictional Hazard Mitigation Plan Update (MJHMPU) 2021 was published in July 2021. Based on review comments, the MJHMPU was revised in October 2021 and adopted by the Sonoma County Board of Supervisors on December 7, 2021. Final approval was provided by FEMA on December 14, 2021.

Page 4.15-10 of the Draft EIR is revised as follows:

Once completed, the replacement bridge will not generate additional demand on emergency services and it would not substantially reduce existing response times or require the construction of new or altered fire stations. The existing bridge is expected to remain open while construction of the new bridge is ongoing to allow for continued emergency response. In the event of temporary closure due to public safety concerns mitigation measures are listed in Section 4.16 *Transportation and Traffic*, TRA-1 and TRA-2, that will ensure minimal impact on ~~emergency~~ emergency service response times. The Project construction operations would be required to comply with existing regulations regarding fire safety. Therefore, impacts would be less than significant.

Page 4.15-11 of the Draft EIR is revised as follows:

No new parks would be developed as part of the Project and the Project will not increase demand and use of existing parks and recreational facilities. There will be temporary and permanent impacts to recreational areas owned or leased by the MRRPD. Temporary impacts to beach and river areas from construction staging, access and publicly prohibited areas include approximately 3.13 to 5.05 acres over the three year construction schedule.

Page 4.15-16 of the Draft EIR is revised as follows

- Following construction, the Monte Rio Fishing Access parking area would be reconfigured, repaved and restriped in coordination with MRRPD and CDFW. In addition, improvements to the Monte Rio Fishing Access parking area drainage system ~~may~~ will be incorporated into the project as part of the project's Low-impact Development (LID) water treatment plans, ~~as feasible~~.
- Temporary Parking during Construction: To mitigate for temporary parking reductions during construction at the Monte Rio Fishing Access parking areas, the County will develop a temporary parking plan that would provide 100% of the existing parking for the duration of construction activities. This temporary parking plan will be subject to review and approval by MRRPD and CDFW.

Page 4.15-17 of the Draft EIR is revised as follows

- Construction activities, excluding activities required to occur without interruption or activities that would pose a significant safety risk to workers or citizens, or in the event of an emergency, shall be limited to between the daytime hours of 7:00 a.m. and 7:00 p.m. No work would be allowed on holidays. Weekend work would only be authorized by the

County for select activities on a case-by-case basis and occur
~~may be allowed, on a limited basis, with prior approval from~~
~~the Department of Transportation and Public Works, during~~
the hours of 9:00 a.m. and 5:00 p.m.

Page 4.15-17 of the Draft EIR is revised as follows

TCR-1 Tribal Cultural Resources Coordination and Consultation

Archival research has identified the site to be sensitive with regard to possible presence of unknown TCR. Throughout the implementation of Mitigation Measures CUL-2 through CUL-7 (see pages 4.5- 19-20, *Cultural Resources*), the qualified archaeologist retained to implement the measures shall confer with local California Native American tribe(s) on the identification and treatment of tribal cultural resources and/or resources of Native American origin not yet determined to be tribal cultural resources through AB 52 consultation. If, during the implementation of Mitigation Measures CUL-2 through CUL-7, a resource of Native American origin is identified, the County shall be notified immediately in order to open consultation with the appropriate local California Native American tribe(s) to discuss whether the resource meets the definition of a tribal cultural resource as defined in AB 52.

Page 4.15-17 of the Draft EIR is revised as follows

TRANS-1- Notification of Closure

The County shall notify property owners ~~along Geysers Road~~ at least 7 days in advance of the proposed temporary closure. Signage shall be placed ~~at both ends of Geysers road~~ notifying motorists of the planned closure. A working jobsite telephone number must be available and provided to Emergency Services during any bridge or approach roadway closures so they may call ahead to request re-opening. Any bridge or approach roadway closures must be re-opened within 10 minutes for emergency vehicles, or within 30 minutes for non-emergency vehicles.

Page 4.17-4 of the Draft EIR is revised as follows

~~*TCR-2 Avoidance of Tribal Cultural Resources*~~

~~When feasible, the Project shall be designed to avoid known tribal cultural resources. The feasibility of avoidance of tribal cultural resources shall be determined by the County, FHWA, and in consultation with local California Native American tribe(s).~~

TCR-2 Inadvertent Discovery of Historical or Archaeological Resources and Worker Awareness Training

The project specifications shall require the contractor to comply with the following measures regarding the discovery of cultural resources, including Native American Tribal Cultural Resources and items of historical and archaeological interest. The County's Construction Inspector and construction personnel will be notified of the possibility of encountering cultural resources during project construction.

The County shall notify the Tribal Historic Preservation Officers (THPOs) of the appropriate local Native American tribe(s) in writing at least five days prior to the start of the project's ground-disturbing activities that work will commence.

Prior to initiation of ground-disturbing activities, the County shall arrange for construction personnel to receive training about the kinds of cultural materials that could be present at the project sites and protocols to be followed should any such materials be uncovered during construction. An archaeologist who meets the U.S. Secretary of Interior's professional standards (48 CFR Parts 44738-44739 and Appendix A to 36 CFR 61) shall provide appropriate archaeological training, including the purpose of the training to increase awareness and appropriate protocols in the event of an inadvertent discovery. Tribal Cultural Monitors may provide appropriate tribal cultural resources training as determined by the Native American Tribes. Training may be required during different phases of construction to educate new construction personnel.

The project specifications will provide that if discovery is made of items of historical, archaeological, or cultural interest, the contractor will immediately cease all work activities in the area of discovery. Historical, archaeological, and cultural indicators may include, but are not limited to, dwelling sites, locally darkened soils, stone implements or other artifacts, fragments of glass or ceramics, animal bones, and human bones. After cessation of excavation, the contractor will immediately contact the County's Construction Resident Engineer or construction inspector and the THPOs. The contractor will not resume work until authorization is received from the Project Resident Engineer.

In the event of unanticipated discovery of historical or archaeological materials occurs during construction, the County shall retain the services of a qualified professional archaeologist who meets the U.S. Secretary of Interior's professional standards (48 CFR Parts 44738-44739 and Appendix A to 36 CFR 61) to evaluate the significance of the items prior to resuming any activities that could impact the site. In the case of an inadvertent historical or archaeological discovery, if it is determined that the find is potentially eligible for listing in the California Register of Historical Resources and/or National Register of Historic Places, and the site cannot be avoided, additional mitigation measures shall be implemented. Mitigation measures may include (but are not limited to): avoidance; capping the site; deeding the site into a permanent conservation easement; or data recovery excavation. Mitigation measures for historical resources shall be developed in consultation with responsible agencies, and the Native American Tribes. If data recovery excavation is necessary, the County shall provide an Archaeological Resource Management and Data Recovery Plan, prepared by a qualified archaeologist, outlining recovery of the resource, analysis, and reporting of the find in collaboration with the Native American Tribes. The Archaeological Resource Management and Data Recovery Plan shall be approved by the County and the Tribes. Implementation of the

Archaeological Resource Management and Data Recovery Plan shall be conducted prior to work being resumed.

TCR-3 Tribal Cultural Resource Plan

~~A Tribal Cultural Resources Plan shall be required for work in areas identified as high to moderate sensitivity for tribal cultural resources during consultation with local Native American tribes during the implementation of TCR 1 and/or by the qualified archaeologist during the implementation of CUL 2 through CUL 7. Prior to starting construction, the County or its consultant, shall prepare a tribal cultural resources treatment plan to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction. The plan shall include any necessary monitoring requirements, suspension of all earth disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with local Native American tribes and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. As appropriate, the tribal cultural resources treatment plan may be combined with any Extended Phase I, Phase II, and/or Phase III work plans or archaeological monitoring plans prepared for work carried out during the implementation of Mitigation Measures CUL 4, CUL 6, CUL 7, or CUL 8. The plan shall be reviewed and approved by the County and the appropriate local California Native American tribe(s) to confirm compliance with these measures prior to construction.~~

TCR-3 Inadvertent Discovery of Human Remains

The project specifications will require the contractor to comply with Public Resources Code section 5097.98 and Health and Human Safety Code section 7050.5, as they pertain to the discovery of human remains. If human remains are encountered, the contractor shall halt work within 50 feet of the find, and contact the County's construction inspector and the Sonoma County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. If the coroner determines the remains are Native American, the coroner will contact the Native American Heritage Commission. As provided in Public Resources Code Section 5097.98, the Native American Heritage Commission will identify the person or persons believed to be most likely descended (MLD) from the deceased Native American. The MLD makes recommendations for means of treating the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. Work shall cease in the immediate area until the recommendations of the appropriate MLD are concluded.

Page 4.17-5 of the Draft EIR is revised as follows

TCR-4 *Native American Monitoring*

For work in areas identified as high to moderate sensitivity for tribal cultural resources, consultation with local California Native American tribe(s) will occur per TCR-1 above, during the implementation of TCR-1 and/or areas For areas identified as sensitive for cultural resources of Native American origin by the qualified archaeologist during the implementation of CUL-2 through CUL-7, Sonoma County DTPW, in conjunction with interested tribes, shall retain Native American monitor(s) representing tribes that are traditionally and culturally affiliated with the geographic area of the project site to observe ground disturbance, including archaeological excavation, associated with the Project. ~~Monitoring methods and requirements shall be outlined in a tribal cultural resources treatment plan prepared under Mitigation Measure TCR-3. In the event of a discovery of tribal cultural resources, the steps identified in the tribal cultural resources plan prepared under Mitigation Measure TCR-3 shall be implemented. In the event of a discovery of tribal cultural resources, mitigations TRC-2 and/or TRC-3 shall be adhered to.~~

Page 4. 19-9 of the Draft EIR is revised as follows:

The Sonoma County Multijurisdictional Hazard Mitigation Plan Update 2021 incorporates wildfire hazard mitigation principles and practices into the routine government activities and functions of the County. The Plan recommends specific actions that are designed to protect people and community assets from losses to those hazards that pose the greatest risk. Mitigation programs and activities identified in the Plan include fuel reduction and vegetation management, roadside chipper service, grant programs for fire management assistance, and fire prevention fees (County of Sonoma ~~2017~~ 2021). The County's Hazard Mitigation Plan is incorporated by reference into the Public Safety Element of the General Plan.

References

Page 7-12 of the Draft EIR is revised as follows:

~~_____ . 2017-2021. Sonoma County Operational Area Hazard Mitigation Plan. September 2017~~ Sonoma County Multijurisdictional Hazard Mitigation Plan Update. October 2021.

Page 7-13 of the Draft EIR is revised as follows:

~~_____ . 2021. 2017. 2016 Hazard Mitigation Plan Update. April 2017.~~
<https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Hazard-Mitigation/Approved-Update/>
(accessed December 2021) Sonoma County Multijurisdictional Hazard Mitigation Plan Update. October 2021. Accessible at
[https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/hazardmitigationupdate#:~:text=Adoption%20of%20the%20Multi%2DJurisdictional,Agency's%20\(FEMA\)%20final%20approval.](https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/hazardmitigationupdate#:~:text=Adoption%20of%20the%20Multi%2DJurisdictional,Agency's%20(FEMA)%20final%20approval.)

Page 7-19 of the Draft EIR is revised as follows:

~~_____ . 2021. 2017. 2016 Sonoma County Hazard Mitigation Plan Update. <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Hazard-Mitigation/Approved-Update/> (accessed January 2022).~~ Sonoma County Multijurisdictional Hazard Mitigation Plan Update. October 2021. Accessible at [https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/hazardmitigationupdate#:~:text=Adoption%20of%20the%20Multi%2DJurisdictional,Agency's%20\(FEMA\)%20final%20approval](https://permitsonoma.org/longrangeplans/proposedlong-rangeplans/hazardmitigationupdate#:~:text=Adoption%20of%20the%20Multi%2DJurisdictional,Agency's%20(FEMA)%20final%20approval)

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Appendix A: Written comments received during the circulation of the Draft EIR.



May 17, 2022

Sonoma County Permit & Resource Management Department
Natural Resources Division
2550 Ventura Avenue
Santa Rosa, CA 95403

Attn: Jackson Ford, Senior Environmental Specialist

Jackson.Ford@sonoma-county.org

Project: Draft Environmental Impact Report (EIR) for the
Bohemian Bridge over the Russian River Replacement Project

Dear Mr. Ford,

The Monte Rio Recreation and Parks District (MRRPD) Board of Directors has requested a professional peer review of the Draft EIR by LACO & Associates of Santa Rosa related to impacts that directly affect the MRRPD's maintenance, operations and properties. Please see the attached Executive Summary of the Findings Report and Memorandum Summary of Findings dated May 13, 2022.

The following list indicates recommendations by the LACO Findings Report and additional items which the MRRPD would like to see implemented:

A-1.1, 1.2 Aesthetics:

Visual dominance is categorized as "Subordinate" and perhaps should be considered at least "Co-Dominant". There should be more detail provided to justify the claim that there will be no permanent visual impact on the environment. The report claims less than significant impact regarding dark sky compliance but there is no detail describing downward facing fixtures or shielded lights to comply with dark sky performance requirements.

A-2.1-2.4 Geology and Soils:

There is a geological/geotechnical report referenced in the draft EIR but the report is not included. The report claims the designs will meet standard seismic and soil stability requirements, but it does not state what the "standards" are. There is no mention of whether the project could exacerbate the liquefaction potential for soils on adjacent properties. There is no description or study of how the removal of the existing piles in the river will/may impact the hydrology of the river or the adjacent MRRPD owned properties. The MRRPD should be provided with the details of the site specific BMPs to understand how the impacts of storm water will be managed. Specifically at the northern portion of the construction site directly adjacent to MRRPD lands and facilities.

A-3

Hazardous Materials:

The report generally lacks abatement protocols for how to address the discovery of aerially deposited lead or asbestos in structures slated for demolition and removal.

A-4

Hydrology and Water Quality:

There are general, but no site specific Best Management Practices with respect to storm water control. BMPs listed should be identified in specific conditions not general requirements. The MRRPD should be provided with a copy of the Storm Water Pollution Prevention Plan (SWPPP), with contact information for the contractor responsible for maintaining the BMPs during construction. The BMPs should also not be limited to surface water conditions but also in place to protect groundwater. It is important for the report to note BMPs are in place to protect ground water supplies, when they will be installed and what their specifics will be. Include as a mitigation, "contractor required to smooth and regrade areas to match preconstruction conditions." There should be attention paid to the removal of in-water gravel pads with culverts for water passage that will temporarily alter the course of the river. The analysis of this section appears to be insufficient. The MRRPD should be presented with a clear plan as to how the contractor will address flooding during construction to avoid floating debris impacting adjacent properties.

A-5

Noise:

The report does not indicate noise impacts on the MRRPD properties. The impacts to the beaches, Koret Park, the Community Center and the Riverfront Meadow have not been included in the noise impacts study. It is the MRRPD's opinion these properties should be included because particularly the beaches see their heaviest uses between April and October coinciding with the construction period. Impact does not include "receptors" for mid-day users on the beaches. The "receptors" impacted are identified as the occupants on adjacent improved properties. There will be an impact of the noise on the beach for beach users. The MRRPD requests the noisiest of activities be conducted when the beach experiences the lowest level of use/occupation.

A-6.1-6.4 Public Service and Recreation:

The bridge construction will necessitate the occasional partial closure of travel lanes on the existing and new bridges during construction. The duration and frequency of these partial closures should be clarified to determine possible impacts to and response times from emergency services in crossing the bridges during construction. Report states 100 percent of parking will be maintained throughout duration of construction while dedicating upper parking lot to construction staging. The lower parking area is to be striped for more efficient parking. The lower parking is not available from October 15-May 15. The existing lower parking area can accommodate more vehicles than listed in the report and as such, maintaining 100 percent of the parking has not been confirmed. In addition, it is described that portions of the Big Rocky Beach will be closed for periods of construction in the third year. The parking allotments for each year should be more clearly identified as it is the MRRPD's opinion that 100 percent of parking cannot be maintained on MRRPD properties. The report states opening of parking areas during certain dates and finding alternative off-site parking for boat trailers. The locations and configurations of these parking conditions and details have yet to be confirmed.

The report does not include a description about what is to happen to the deep scour holes left in the river once the existing bridge piers are removed. The report should further describe if these scour holes are to be remediated/corrected or left as is. The report states the removal of the existing piers and installation of the new bridge will be less than a significant impact to recreation and it is the MRRPD opinion that additional justification for this determination is needed.

A-7.1-7.3 Transportation:

Per sheet 10 of the 35% design plans regarding signing and striping there appears to be no provision for cross walks at the northern anchorage of the bridge. This area experiences a high volume of pedestrian and bicycle traffic and it is expected that traffic will increase due to the future improvements for bicycle lanes and pedestrian walkways. A provision should be made for accommodating the non-motorized traffic on the bridge to safely enter the public beach and parking areas specifically from the upstream side of the bridge across Bohemian Highway to the parking lot entry.

It is also of note that there are Sonoma County Transit bus stops on Bohemian Highway between the bridge and Highway 116. The bus stops are not indicated on the striping/signage plan and it is unclear how those stops will be provided with adequate area for loading and unloading passengers safely. Efforts should be made to coordinate with SCT as per minimum bus stop standards.

There is not currently a provision for an at-grade sidewalk and curb from the northern anchorage of the bridge along the new retaining wall facing the CDFW parking area. Consideration should be made for a sidewalk and curb at this location to provide a safe pedestrian path of travel from the driveway entrance to the access road fronting the beach. This area has historically been a congested vehicle area and for the purposes of maintaining an adequate emergency vehicle access lane to the beach, the curb at the full length of the improved sidewalk should be painted red to indicate a no parking or stopping area.

Please confirm that you are in receipt of this correspondence and the related attachment.

Thank you for your time and attention to this matter.

Regards,



Stephen K. Baxman, Chair
MRRPD Board of Directors

cc: Supervisor Lynda Hopkins, district5@sonoma-county.org
Leo Chyi, Leo.Chyi@sonoma-county.org
Deborah Waller, Deborah.Waller@sonoma-county.org
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Letter AA

May 13, 2022

9190.01

Monte Rio Recreation and Park District (MRRPD)
PO Box 877
Monte Rio, CA 95462
Sent via email to: administrator@mrrpd.org

Subject: Summary of Findings
Review of the Bohemian Highway Bridge Over Russian River Replacement Project Draft
Environmental Impact Report

Dear Monte Rio Recreation and Park District:

This letter has been written to present the results of LACO Associates' (LACO) professional review of the Draft Environmental Impact Report (EIR) prepared for the Bohemian Highway Bridge Over Russian River Replacement Project (Bridge No. 20C0018; 04-SON-O-CR; SCH No. 2021030538) by the Sonoma County Permit and Resource Management Department (Permit Sonoma) of the Natural Resources Division of the County of Sonoma (County) for the Sonoma County Department of Transportation and Public Works in April 2022. Pursuant to the Service Agreement between LACO and the Monte Rio Recreation and Park District (MRRPD), LACO was contracted to review the Draft EIR as it relates to the MRRPD and MRRPD facilities and prepare a summary of findings.

The attached Summary of Findings Memorandum (Memo) dated May 13, 2022 provides additional detail on the project understanding and approach to the Draft EIR review, and provides a detailed description of our findings related to the Draft EIR. As provided in the Memo, we noted that various sections of the Draft EIR lack justification to support claims and conclusions reached in the various environmental analyses; however, our analysis should not be considered exhaustive. While we expand upon a number of our comments in the Memo, this letter has been written to document our comments regarding the Draft EIR that specifically relate to the MRRPD and MRRPD facilities and provide recommendations for how the MRRPD may wish to proceed.

Findings Relevant to the MRRPD and MRRPD Facilities

The following is a brief summary of our findings as we understand them to relate to the MRRPD and MRRPD. Discussion of each of these is expanded upon in the Memo.

Aesthetics (Section 4.1 of the Draft EIR)

The discussion of aesthetic impacts is limited to discussions of the proposed bridge structure itself. This section does not include a discussion of how removal of the piles that are currently within the river may change the shape of the river and/or adjacent MRRPD resources, if at all. This comment may be related to more of a concern with the potential for changed hydrology of the river, which is briefly discussed under Hydrology and Water Quality, below.

Geology and Soils (Section 4.7 of the Draft EIR)

The discussion of geology and soils lacks specific details on the technical analysis utilized to make the less-than-significant impact findings. This section of the Draft EIR references a geotechnical

investigation for the Project Foundation Type Selection Report (p.4.7-1); however, this is not a document provided on the Reference list and was not otherwise made readily available for public review. Without the support of a technical report prepared specifically for the proposed project, we feel it is difficult to assess the project's potential impacts on geology and soils in the project area. For example, as detailed in the Memo, this section of the Draft EIR states that the potential for liquefaction exists at the site, and is considered to be high in the area of "beach sand" adjacent to where the river turns, below the north approach (4.7-13). The analysis determines that the impact of liquefaction on project design is low; however, there is no mention of whether implementation of the project could exacerbate the liquefaction potential of soils in this area. The area described contains or is adjacent to MRRPD beaches that could be affected by increased instability in the area.

Hazards and Hazardous Materials (Section 4.9 of the Draft EIR)

This section of the Draft EIR appears to provide sufficient detail on potential hazards in the project area; however, the mitigation measure for handling potential existing hazards lacks clear abatement protocol for aerially deposited lead (ADL) should it be found to be present. Due to the proximity of potential hazards and construction/demolition activities to MRRPD facilities, the MRRPD may wish to request that the County amend mitigation measure HAZ-1 to include ADL abatement protocol.

Additionally, the MRRPD should note the possible or potential asbestos containing materials (ACM) located near MRRPD facilities and that may be removed as part of the project. These include an old bridge foundation in the riverbed; a retaining wall next to Main Street; old building foundations and driveways at the southern section of the proposed bridge; and large concrete blocks at the northwest project site.

Hydrology and Water Quality (Section 4.10 of the Draft EIR)

The discussion of hydrology and water quality lacks critical detail on potential impacts to water resources in the project area. This section emphasizes the importance of utilizing BMPs of typical construction sites in compliance with general regulations design to protect water quality; however, potential BMPs are not discussed in relation to specific project impacts. As runoff or erosion from the construction site would most likely impact MRRPD facilities adjacent to the construction areas on nearly all sides, the MRRPD may wish to request that the Draft EIR include additional detail. Alternatively, or in addition, the MRRPD may benefit from requesting that it be provided with the Stormwater Pollution Prevention Plan (SWPPP), once complete, and the contact information for the contractor responsible for BMP maintenance so that any concerns or issues during construction related to stormwater runoff onto adjacent MRRPD facilities could be addressed expeditiously.

Of bigger concern and confusion in the Draft EIR is a statement that "prior to leaving the site, the contractor will be required to smooth and regrade disturbed areas to match preconstruction conditions" (p.4.10-18). As any alteration to the conditions of the project area post-construction may potentially impact the hydrology of the river as it passes through the project area, we believe this should be included as a mitigation measure, or the Draft EIR should include a discussion, with substantial evidence to support it, on why this isn't needed. A change to the conditions of the project area could directly impact the MRRPD beaches in the project area.

Additionally, the Draft EIR notes that the project site is within a flood hazard zone; however, it fails to include a discussion of how potential impacts associated with project inundation during the winter months would be avoided and/or mitigated, as needed. As this project will be constructed over a

three-year time period, it is possible flooding could occur before all construction activities have been completed. The MRRPD may benefit from discussing this concern with the County, if appropriate, in order to ensure potential impacts to MRRPD facilities from debris from the construction site would be dealt with appropriately. If this is not a concern, it should be clarified in the Draft EIR.

Noise (Section 4.13 of the Draft EIR)

Regarding potential noise impacts, we noted a detailed discussion and appropriate mitigation for reducing potential impacts to sensitive receptors during the night hours. However, the MRRPD beaches, which would be occupied during mid-day hours, were not considered to be sensitive receptors and so were not considered in the impact analysis in this section. A discussion of potential noise impacts to MRRPD facilities was limited to the Public Services and Recreation section, discussed below. Given the proposed noise levels provided in this section, the MRRPD may wish to consider requesting that construction activities that would result in significant noise levels occur when use of MRRPD properties are at their lowest.

Public Services and Recreation (Section 4.15 of the Draft EIR)

The Draft EIR includes a lengthy discussion on existing public services and recreation opportunities within the project area and includes statements and details about MRRPD facilities that we believe the MRRPD should review and correct with the County, if needed. A couple of these details are detailed in the Memo.

The discussion in this section states that access to beach and river areas will remain open during construction, as would some parking at the Big Rocky Beach parking area; however, it is unclear when during the three-year construction period access to the beach and river areas would be limited and which parking spaces in the Big Rocky Beach parking area would remain open during construction. LACO believes that more information should be provided so that these details can be better understood and planned for by the MRRPD. Additionally, the discussion notes that access to Dutch Bill Creek Beach via the unimproved access road/pedestrian path would be restricted during the first and second years of construction, but open during the third year of construction (p. 4.15-12). We recommend that the MRRPD remind the County provide details on how the ADA access at this location will be provided during construction and if any impacts to the ADA access are anticipated.

Mitigation measure PS-1 (p.4.15-16) states that the County would coordinate with MRRPD to determine if resurfacing and replacing the bollards along the path to Dutch Bill Creek is desired, and develop a mutually agreed upon plan for MRRPD's review and approval. The MRRPD should be made aware of this, and other measures directly affecting the MRRPD, in mitigation measure PS-1.

Conclusion

As provided throughout the Memo and this letter, in LACO's professional opinion and standards of practice, we believe the Draft EIR prepared for the Bohemian Highway Bridge Over Russian River Replacement Project, dated April 2022, is lacking in detail and discussion and omits important project details. It appears that numerous determinations reached in the Draft EIR were conclusory and not supported by substantial evidence in the record. In LACO's professional opinion, more discussion to explain how conclusions were reached is necessary within the Draft EIR. Additionally, as noted, in certain cases, additional detail would not only strengthen the findings in the Draft EIR, but also clarify the extent of potential impacts of the proposed project to the MRRPD and MRRPD facilities.

Please do not hesitate to contact us with any questions or if you require any additional information.

Sincerely,
LACO Associates

A handwritten signature in blue ink that reads "Rebecca Dalske". The signature is written in a cursive style with a large initial "R".

Becky Dalske, AICP
Senior Planner

A handwritten signature in blue ink that reads "Mike Nelson". The signature is written in a cursive style with a large initial "M".

Mike Nelson, AICP
Planning Principal, President & CEO

MEMORANDUM

Summary of Findings
Review of the Bohemian Highway Bridge Over Russian River
Replacement Project Draft Environmental Impact Report

Date: May 13, 2022
Project No.: 9190.01
Prepared For: Monte Rio Recreation and Park District

1.0 INTRODUCTION

This memorandum presents a summary of findings for LACO Associates' (LACO) review of the Draft Environmental Impact Report (EIR) prepared for the Bohemian Highway Bridge Over Russian River Replacement Project (Bridge No. 20C0018; 04-SON-O-CR; SCH No. 2021030538) by the Sonoma County Permit and Resource Management Department (Permit Sonoma) of the Natural Resources Division of the County of Sonoma (County) for the Sonoma County Department of Transportation and Public Works in April 2022. The Draft EIR is currently available for a 45-day public review and comment period, beginning on April 4 and ending on May 18, 2022. Per the Notice of Availability (NOA) for the project, all comments on the Draft EIR must be submitted during the public review period and must be received by 5:00PM on Wednesday, May 18, 2022.

The Sonoma County Board of Supervisors (Board) will be holding a virtual public meeting on Tuesday, May 17th, beginning at 8:30AM. The purpose of the hearing is for the Board and Permit Sonoma staff to receive comments on the adequacy and accuracy of the Draft EIR. The Board will not respond to comments or take action on the project at this hearing. Certification of the Final EIR will be considered at a later hearing.

The Monte Rio Recreation and Park District (MRRPD) has requested that LACO perform a peer review of the Draft EIR on behalf of the MRRPD to assess the adequacy of the Draft EIR and potential impacts to the MRRPD and associated facilities.

2.0 PROJECT UNDERSTANDING

LACO understands the County proposes to remove the existing bridge on the Bohemian Highway over the Russian River and construct a new replacement bridge on an alternate alignment. Construction is expected to be completed over a period of three years. The bridge is expected to be approximately 846 feet in length with a width varying from approximately 52 feet at the approaches to approximately 60 feet at the main span. The bridge would be supported on concrete piers with cast-in-drilled-hole piles, to be embedded up to 120 feet below the riverbed. The replacement bridge has been designed to provide access for vehicles, bicycles, and pedestrians.

The MRRPD operates the Big Rocky Beach and Sandy Beach on the north side of the river and the Dutch Bill Beach on the south side of the river, and maintains additional facilities within the vicinity of the existing bridge, including the Monte Rio Community Center located northwest of the existing bridge.

3.0 DRAFT EIR REVIEW FINDINGS

The following section provides a summary of findings following our review of the Draft EIR. In total, the Draft EIR is 484 pages in length, excluding appendices. Please note that only one appendix (Appendix A – 35% Design Plans) is provided on the County's website for review. Our comments are grouped under several topical areas, provided below.

3.1 Adequacy of the Draft EIR

Overall, our review indicates that the required components of a Draft EIR, as specified in Sections 15120 to 15132 of the State CEQA Guidelines, were included in the Draft EIR, including the following:

- Table of contents or index (*State CEQA Guidelines §15122*)
- Summary (*State CEQA Guidelines §15123*)
- Project Description (*State CEQA Guidelines §15124*)
- Environmental Setting (*State CEQA Guidelines §15125*)
- Consideration and discussion of environmental impacts, including significant impacts and growth-inducing impacts of the project (*State CEQA Guidelines §15126*)
- Mitigation measures proposed to minimize significant impacts (*State CEQA Guidelines §§15126 and 15127*)
- Alternatives to the proposed project (*State CEQA Guidelines §§15126 and 15126.6*)
- Effects not found to be significant (*State CEQA Guidelines §15128*)
- Organizations and persons consulted in preparing the Draft EIR (*State CEQA Guidelines §15129*)
- Discussion of cumulative impacts (*State CEQA Guidelines §15130*)

In addition, each environmental topical area included in Appendix G of the State CEQA Guidelines was also included, discussed, and evaluated in the Draft EIR, including:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Specific comments pertaining to each respective topical area described above are provided in more detail in the subsections below. Given the short time frame of our review, the following analysis may not be exhaustive.

3.1.1 Review Limitations

Pursuant to the Service Agreement between LACO and the MRRPD dated April 27, 2022, LACO's review of the Draft EIR was limited to the chapters and descriptions of the Draft EIR related to the MRRPD and MRRPD facilities. Based on a cursory review of the environmental topical areas listed above, LACO determined that the sections of the Draft EIR pertaining to Agriculture and Forestry Resources, Energy, Mineral Resources, Population and Housing, Tribal Cultural Resources, and Utilities and Service Systems were not relevant to the MRRPD and LACO therefore did not perform a detailed review of these sections.

3.1.2 General Comments

Each environmental impact section of the Draft EIR contains thorough regulatory setting discussions and overview of the applicable regulations pertaining to the respective topical area. However, in some instances, it was noted that the Draft EIR lacks in providing justification to support claims and conclusions reached in the various environmental analyses (described further below).

AA-1 3.1.3 Executive Summary, Introduction, Project Description, Environmental Setting

The Executive Summary, Introduction, and Project Description do a comprehensive and thorough job of describing the proposed project, although there is information provided that is extraneous to the project, such as the list of all County Zoning designations. One item of note is the *Anticipated Construction Schedule and Methods* section of the Project Description, which states that no work is proposed on weekends and holidays (p.2-13). This differs from mitigation measure PS-1, which states that weekend work may be allowed, on a limited basis, with prior approval from the Department of Transportation and Public Works, during the hours of 9:00 a.m. and 5:00 p.m (p.4.15-17).

The introductory sections of the DEIR describe the Notice of Preparation (NOP) process, and summarizes the comments of the MRRPD within Table 1-1 (NOP Comments and EIR Response), as follows:

"The commenter summarizes the Districts concerns. This includes parking for Community Center events during 3 years of construction, overflow parking may impact emergency services response times. MRRPD has no life guards, concerned about safety with work pad and culverts during construction. Existing bridge piers to be removed, but abutments left behind- there are safety concerns regarding what is left behind, also hydrological impacts w leaving these in place. How will demo affect construction staging in year 3, how this affects access to Big Rocky Beach? New alignment will remove trees and a monument sign on the beach, will these be replaced? New alignment alters the driveway entrance to the parking lot and community center, will the project increase the size of the SCT bus stop, specifically the east bound stop from bridge to Hwy 116? Is the intention to install crosswalks, specifically the N. end from the theater to increase safety?" (p.1-4)

The Document provides the following response:

"Sonoma County staff are coordinating directly with the Monte Rio Recreation and Park District. Any impacts to their facilities will be discussed directly with the district. Compensation or compensatory actions will be agreed to during the right-of-way acquisition phase of the project. The right of way phase cannot begin until after the CEQA certification of the project. Safety is always prioritized during all projects, and appropriate measures will be taken to ensure safety. Specific questions or

requests about the project that are unrelated to environmental impacts have been addressed by County staff" (p.1-4).

The responder does not attempt to answer the questions, nor does the document direct the reader to where these issues are addressed. The purpose of the NOP is to assist the Lead Agency in defining the scope of the project, as well as solicit public input. This response does not provide any analysis or direction regarding the District's concerns.

Section 3 of the Draft EIR provides a brief overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4 of the Draft EIR, *Environmental Impact Analysis*.

AA-2

3.1.4 Aesthetics

The Aesthetics section (Section 4.1) notes that surrounding recreational land uses are within viewing proximity and provide clear views to the project area (p.4.1-2), but lacks detail regarding which specific land uses. The County's Visual Assessment Guidelines were used to determine significance thresholds for visual impacts of the project (p.4.1-3). Five (5) public viewpoints were utilized in the analysis, including: (1) The Northern Bridge Approach, (2) the beach areas (Sandy Beach, Big Rocky Beach, Dutch Bill Beach, and River Boulevard Businesses), (3) Bohemian Highway Bridge over the Russian River, (4) the Southern Bridge Approach, and (5) Moscow Road (p.4.1-3). It is unclear if the assessed viewsheds encompass all public vantage points where the proposed bridge would be visible. The Draft EIR includes twelve (12) before and after photos included at six (6) different viewpoints (pp.4.1-5 to 4.1-10). Differences noted by LACO when comparing the "before" (photo of current view) and "after" (photo simulation) indicate there will be tree removal, increased height of bridge, and no piles within the riverbed (where currently there are two), which will be visible from various MRRPD facilities. One item LACO feels could have been discussed was whether removal of the piles from the river change the shape of the river and/or adjacent MRRPD resources (such as the adjacent beach).

Site sensitivity was classified as "High" and the visual dominance was classified as "Subordinate", and therefore, per Table 4.1-3, all aesthetic impacts would therefore be considered less than significant (p.4.1-20). However, no justification is provided in the Draft EIR to explain why or how it was determined that the project falls into these classifications. Our review indicates the "High" site sensitivity fits well, based on the following definition:

1. Designated scenic resource, corridor or landscape unit, or community separator
2. Natural setting, scenic backdrop
3. Visible from scenic corridor, public roads, or other public use areas (parks, trails, etc.) because of slope or situation on a ridgeline" (p.4.1-17, Table 4.1-1).

However, we do not entirely agree with the chosen "Subordinate" visual dominance classification, nor is there any justification provided. The definition for the "Subordinate" visual dominance classification is as follows:

1. Project is minimally visible from public view.
2. Element contrasts are weak – they can be seen but do not attract attention.
3. Project generally repeats the form, line, color, texture, and night lighting of its surroundings. (p.4.1-19, Table 4.1-2)

In our professional opinion, we believe there is justification to support the project should be considered at least "Co-Dominant", where project elements are moderate (they can be prominent within the setting, but

AA-2

attract attention equally with other landscape features; and form, line, color, texture, and night lighting are compatible with their surroundings). Based on the visual simulations, the project appears to be more than just “minimally visible” – the bridge is a large, prominent feature and doesn't fully blend in with the surrounding (see Figures 4.1-2, 4.1-4, 4.1-6, 4.1-8, 4.1-10). Further, based on the included visual simulations, someone could make the argument that the original bridge seems to blend in better with backdrop (see Figures 4.1-1, 4.1-5, 4.1-7, and 4.1-9).

Under Impact AES-1, the document states: “The project is designed to not introduce contrasting elements to the existing landscape, and would improve the existing viewshed as the bridge would introduce more natural lines, as opposed to the more angular structure of the existing bridge, and a paint color would be chosen in coordination with the community” (p.4.1-21, Impact AES-1). Also, under Impact AES-3, it is noted “the proposed bridge design would be fully compatible with the existing landscape” (p.4.1-22). We feel more detail to support their justification, why the new bridge would not have permanent visual impacts, and why the bridge would be “fully compatible” per the statement should have been included. Finally, under Impact AES-4, related to light and glare, the Draft EIR claims this impact would be reduced to a less-than-significant impact with implementation of Mitigation Measure AES-4 (p.4.1-23); however, there is nothing specific to light or glare in this mitigation measure (such as meeting standards of the International Dark Sky Association, including downward facing and shielded lighting, etc.). It is also claimed that no new sources of glare would occur as a result of the project (p.4.1-23); however, no explanation is provided to support this claim (i.e., use of non-reflective materials, etc.).

Additionally, Mitigation Measure AES-1 uses the phrase “to the extent feasible” is not appropriate and therefore an unenforceable mitigation measure. Furthermore, this mitigation measure proposes a replacement ratio of 1:1 for compensatory tree removal. This ratio is generally not an acceptable ratio to the California Department of Fish and Wildlife (CDFW).

While we believe this section lacks important details to justify the impact determinations, we do not have any specific recommendations for the MRRPD relative to this section as we do not think the analysis contained within this section will significantly impact the MRRPD or MRRPD facilities.

AA-3

3.1.5 Air Quality

This section of the Draft EIR notes that two models were used [Sacramento Metropolitan Air Quality Management District Road Construction Emissions Model (RCEM) + California Emissions Estimator Model (CalEEMod)] to estimate anticipated emissions (p.4.3-11), and inputs utilized for the CalEEMod model were summarized. This section does not explicitly state if the project meets or does not meet screening criteria in the 2017 CEQA *Air Quality Guidelines*; the reader has to infer. However, since demolition would occur under the project, the project would not meet the criteria and it is assumed that that is why estimated emissions were required to be modeled. This is not explained in the section. The LACO team also believes additional discussion should have been added to the impact analyses to back-up and provide reasoning for conclusions (Impacts AQ-1 and AQ-2). Impact AQ-3 finds that sensitive receptors may be exposed to temporary construction-generated pollutants. Further, it is stated that construction would temporarily increase air pollutant emissions, and possibly created localized areas of unhealthy air pollution levels or air quality nuisances (p. 4.3-13). Due to the proximity of MRRPD facilities to the project site, there appears to be the potential for impacts to occur at those locations and to users of these facilities. However, the project would not be expected to result in objectionable odors that could affect a substantial number of people (Impact AQ-4; p.4.3-15). We agree that implementation of BAAQMD's Basic Construction Mitigation Measures (Mitigation Measure AQ-1; p. 4.3-14) would reduce construction impacts to a less-than-significant

level, as these are fairly standard best management practices (BMPs) implemented under construction projects to minimize potential air quality impacts. We also believe copies of the modeling results should have been included as appendices so that interested parties could have the opportunity to further review the data.

AA-4 **3.1.6 *Biological Resources***

Section 4.4 of the Draft EIR evaluates the potential for significant impacts to biological resources that would result from development facilitated by the project. A Natural Environmental Study (NES) and Biological Assessment (BA) prepared for the project evaluated the biological conditions within the Biological Study Area (i.e., plant and wildlife species, special-status fish, vegetation communities, jurisdictional waters, wildlife movement areas, and other sensitive habitats) and assessed the potential for significant impacts to biological resources as a result of project implementation. GPA Consultants completed the NES and BA in March and April 2021, respectively (GPA, 2021a, 2021b). A summary of the results of the NES are presented in this section, together with additional biological review and field surveys conducted during the summer and fall of 2021 by County of Sonoma staff, as described in the document. The impact analysis presented in this section is based on the findings of the NES, BA, and additional biological studies and analysis conducted by the County of Sonoma staff during the summer and fall 2021.

While the studies and impact analysis appear adequate for this project, many of the fifteen (15) mitigation measures use the phrase “to the extent feasible” and therefore are difficult to quantify or enforce. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. Furthermore, see comments regarding AES-1, which is also of note with regard to the adequacy of this section for tree removal and replacement.

We do not have any specific recommendations for the MRRPD relative to this section as we do not think the analysis contained within this section will significantly impact the MRRPD or MRRPD facilities.

AA-5 **3.1.7 *Cultural Resources***

In the Cultural Resources section (Section 4.5), further study is required under Mitigation Measure CUL-2 (p.4.5-18) to determine the presence/absence and extent of archaeological resources on the project site. LACO strongly feels this additional survey should have been conducted prior to releasing the Draft EIR so that impacts could be fully assessed under CEQA.

It was found that demolishing the existing bridge would lead to a significant and unavoidable impact (as the existing bridge is considered a historical resource under CEQA, due to it being a listed Sonoma County Landmark (2003; p.4.5-16). In reviewing the Alternatives section (p.6-6, Alternative 2: Rehabilitation/Retrofit), retrofitting the bridge was considered; however, the extensive modifications required to reinforce the bridge would significantly alter the look and character of the bridge, would cost more than replacement, would only partially meet design standards, would only meet a few project objectives, and have a short service life, so this alternative was rejected.

We do not have any specific recommendations for the MRRPD relative to this section as we do not think the analysis contained within this section will significantly impact the MRRPD or MRRPD facilities.

AA-6

3.1.8 Geology and Soils

Section 4.7 of the Draft EIR assesses potential impacts of the project relating to geology and soils. The beginning paragraph of this section notes that the “data used to inform this section is based in part by a geotechnical investigation for the Project Foundation Type Selection Report” (p.4.7-1). It is unclear if a geotechnical investigation was performed for the proposed project and if so, how it was incorporated into the impact analysis in this section.

The analysis contained for Impact GEO-2 states that the potential for liquefaction exists at the site, particularly in the area adjacent to where the river turns, below the north approach. It is noted that the “beach sand” in this area is considered to have high liquefaction potential (4.7-13). The analysis determines that the impact of liquefaction on project design is low; however, there is no mention of whether implementation of the project could exacerbate the liquefaction potential of soils in this area. The area described contains or is adjacent to MRRPD beaches that could be affected by increased instability in the area. Impact GEO-2 additionally notes that conditions of approval would require that bridge designs for construction meet all standard seismic and soil test/compaction requirements; however, it is unclear what the standard seismic and soil test/compaction requirements are and if they have been evaluated for the proposed project. Without detail on project-specific requirements, it is unclear what types of construction measures will be required and how they may impact the surrounding area, including MRRPD lands. The conclusions contained in this section would benefit from the findings of an evaluation performed for the specific geological conditions at the project site.

The analysis related to Impact GEO-3 repeats, and slightly expands upon, the regulations introduced under the Regulatory Setting (p.4.7-8) and provides a general description of project activities (p.4.7-14). This section finds that the project would not result in substantial soil erosion or the loss of topsoil due to adherence to permit requirements and County regulations. This section also references the Hydrology and Water Quality section (Section 4.10) of the Draft EIR. This section would benefit from a discussion of how the relevant regulations specifically relate to the proposed project, including a list of standard BMPs that may be implemented as part of the project. This section may benefit from reference to Mitigation Measure BIO-2, which describes the BMPs that will be implemented. As the project site is directly adjacent to the river and is partially comprised of sandy beach areas, project-specific BMPs are important to understand how project impacts will be managed. As the northern portion of the construction site is directly adjacent to MRRPD lands and facilities, it is important to understand how potential impacts will be reduced.

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3.1.9 Greenhouse Gas Emissions

Section 4.8 of the Draft EIR assesses potential impacts of the project related to greenhouse gas (GHG) emissions. One comment our team had regarding this section is in regard to Impact GHG-1. The amount of CO₂e that would be generated over the three-year construction period is provided, but the amount is not compared to anything (such as a threshold or the County or State’s emissions). Instead, it is automatically stated the impact would be less than significant, with no justification or reasoning provided (p.4.8-13). This impact would not; however, greatly impact the MRRPD and MRRPD facilities.

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3.1.10 Hazards and Hazardous Materials

Section 4.9 of the Draft EIR assesses potential impacts related to hazards and hazardous materials. The analysis contained within this section is based on the Project Preliminary Phase 1 Initial Site Assessment (ISA) completed by PARIKH Consultants in May 2021. This document was not included for public review with the Draft EIR. This section describes existing potential hazards in the general project area, which may include

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contaminants such as aerially deposited lead (ADL), asbestos containing materials (ACM), lead paint, and contaminated soils (p.4.9-1). Potential ACM that may be near MRRPD facilities include an old bridge foundation in the riverbed; a retaining wall next to Main Street; old building foundations and driveways at the southern section of the proposed bridge; and large concrete blocks at the northwest project site (p.4.9-2). The discussion notes that the potential ACM would be tested for ACM prior to removal or disturbance, if the object would be impacted by the project. If determined present, it is noted that "ACM will be abated by using contractors certified to perform such work, and in accordance with state and federal regulations" (p.4.9-3). Mitigation Measure HAZ-1 requires the completion of a Phase II Site Assessment prior to construction and recommends specific measures for testing for and abating potential contaminants in the project area. This mitigation measure, however, appears to lack proper abatement protocol in the event ADL is present. It is recommended that specific requirements for abating ADL, should it be found to be present within the project area, be added to the mitigation measure.

The analysis contained under Impact HAZ-1 notes that hazardous materials of various types would be needed for construction-related activities and that the storage, handling, use, and disposal of these materials are regulated by County, State, and Federal regulations and that implementation of standard BMPs under the Stormwater Pollution Prevention Plan (SWPPP) would further reduce the potential of accidental release or exposure. The discussion determines that the impact would be less than significant; however, in Section 4.4 (Biological Resources) of the Draft EIR, Mitigation Measure BIO-3 (Accidental Spill and Pollution Prevention Mitigation Measures) is recommended to reduce the potential for chemical spill or contaminant releases into the waterways. This mitigation measure should be included in the significance determination under Impact HAZ-1.

The Draft EIR notes that existing piers would be cut below grade, approximately three or four feet below river bottom. It is in our professional opinion that potential safety concerns regarding abutments left behind, if any, should be addressed in the Draft EIR. While this reference was included in the Section 4.13 (Noise), it is related to public safety and so included in this discussion related to hazards.

Additionally, we noted the following discrepancies that, if corrected, could improve the Draft EIR; however, these discrepancies do not affect the environmental analysis as it relates to the MRRPD and MRRPD facilities:

- The Setting discussion under Section 4.9 of the Draft EIR excludes residences from the definition of sensitive receptor. This differs from the definition of sensitive receptors included in Section 4.3 (Air Quality) of the Draft EIR, which includes schools, hospitals, senior living centers, and residences.
- The Cumulative Impacts discussion under Section 4.9 of the Draft EIR references mitigation measures HAZ-1 through HAZ-4; however, the impact analysis proposes only mitigation measures HAZ-1 and HAZ-2.

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3.1.11 Hydrology and Water Quality

Section 4.10 of the Draft EIR assesses potential impacts of the project to surface water and groundwater resources. The discussion under Impact HWQ-1 includes a description of typical construction sites and general regulations designed to protect water quality. This discussion would benefit from a description of potential site-specific BMPs that will be implemented to deal with project-specific impacts during construction of the project. Potential BMPs are provided, but the analysis includes no discussion of how those BMPs will protect water quality. While this section references mitigation measures BIO-1, BIO-2, BIO-4 (this is listed twice), and BIO-11 (included under Section 4.4, Biological Resources, of the Draft EIR), there is no discussion of how implementation of these mitigation measures will help to protect water quality. A brief description of each and how it relates to specific project impacts would improve this analysis. Additionally, this section appears

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to focus primarily on potential impacts to surface water. The Environmental Setting discussion of this section notes that, "according to the project's Preliminary Foundation Design Information Memo (Parikh, 2020), groundwater was observed in the river during drilling in 2019" and "it is assumed that groundwater level is at elevation 5 feet for the project design" (p.4.10-6). Due to the potential for the project to encounter groundwater during construction activities, it is important to understand whether BMPs specific to protecting groundwater quality have been considered to be appropriate for this project and if so, when they will be implemented.

The discussion under Impact HWQ-3 notes that "prior to leaving the site, the contractor will be required to smooth and regrade disturbed areas to match preconstruction conditions" (p.4.10-18). As any alteration to the conditions of the project area post-construction may potentially impact the hydrology of the river as it passes through the project area, we believe this should be included as a mitigation measure, or the Draft EIR should include a discussion, with substantial evidence to support it, on why this isn't needed. A change to the conditions of the project area could directly impact the MRRPD beaches in the project area. Additionally, while it may not affect the impact determination, the construction-related discussion in this section should discuss the in-water gravel work pads with culverts for water passage that will (temporarily) alter the course of the river. Without a discussion of all impacts of construction that may alter the existing drainage patterns of the site or area, the analysis in this section is insufficient.

While the discussion under Impact HWQ-4 notes that the proposed replacement bridge will be raised to meet the 100-year flood level and will be an improvement over the existing structure during flood events (p.4.10-19), this section fails to discuss the alteration of drainage patterns during construction of the project. As noted throughout the Draft EIR, the project will be constructed over a three-year time period. During years one and two, the existing bridge will remain open for travel and during year three, the new bridge will become operational. This section would benefit from a discussion of whether flood flows would be impeded or redirected during the winter months during which both bridges are present and how, if at all, that would impact the surrounding area, which includes MRRPD facilities.

The discussion under Impact HWQ-5 acknowledges that the project site is within a flood hazard zone and finds that the project would not increase the risk of releasing pollutants due to flood inundation as the bridge will be constructed at a higher elevation than the existing bridge (p.4.10-20). As this project will be constructed over a three-year time period, it is possible that the project area could become inundated during the construction over the winter months. This section should include a discussion of how potential impacts associated with project inundation during the construction period would be managed.

3.1.12 Land Use and Planning

This section (Section 4.11) describes the existing land use setting and uses of the project site and adjacent areas. It analyzes the consistency of the project with applicable land use plans, policies, and regulations, and does not identify any environmental effects that would arise from any inconsistencies. The section references many policies that do not seem to be related to the project, but it does not appear that there are any policies that conflict with the project or required mitigation. The discussion contained within this section would not affect the MRRPD or MRRPD facilities.

AA-10 3.1.13 Noise

Section 4.13 of the Draft EIR assesses potential noise impacts associated with the project. This section notes the principal noise generator occurring near the project site would be vehicle traffic on major County roads

AA-10 in the area. These roadways include State Route 116 and Bohemian Highway, which are identified as "Noise Impacted Road Segments" in the County's General Plan 2020 Noise Element. Local collector streets typically are not considered substantial noise sources as traffic volume and speeds are generally lower than for freeways and major County roads (p. 4.13-4).

Construction noise was estimated in a technical memorandum prepared by *AMBIENT Airy Quality & Noise Consulting*, for the County in 2021. A copy of this memo was not included for public review with the Draft EIR. According to the discussion, during construction of the project, noise from construction activities may intermittently dominate the noise environment in the immediate project area. Table 4.13-5 summarizes noise levels produced by construction equipment commonly used on roadway and bridge construction projects (p. 4.13-10). Based on the attenuation rate provided, the distances to nearby land uses, the equipment noise levels identified in Table 4.13-5, and assuming multiple pieces of equipment operating simultaneously, the highest predicted average-hourly noise levels at nearby land uses would range from approximately 63 to 88 decibels A (dBA) Leq (equivalent continuous sound level) (p. 4.13-7). It is important to note these noise levels are significantly higher than the maximum allowable exterior noise exposures for non-transportation noise sources as shown in Table 4.13-4.

This section notes the project will not involve construction of a new roadway, cause a significant change in vertical or horizontal alignment, or result in an increase in capacity, and that noise resulting from the operation of the bridge would not be an increase from the baseline of the existing bridge (p.4.13-11). It is important to note that the new bridge lanes will be wider than those existing to allow trucks to cross at the same time, increasing the traffic flow anticipated for motor vehicles and bicycles, with little justification provided. The highest predicted average-hourly noise levels are projected to occur at land uses located nearest proposed construction, demolition, and road paving areas, include Bartlett's Market, Noel's Automotive, Rio Theater, Lovett's Nursery, and West Coast Financial (p. 4.13-13). In our professional opinion, it doesn't seem appropriate to not include the MRRPD's properties in the list provided, particularly because construction activities near MRRPD beaches will occur during summer months, June to October, when the MRRPD beaches are most highly utilized by the public.

It is stated that "Although construction of the new bridge will occur over a three-year time frame, demolition and construction activities would be focused in the months between April and October. As a result, construction and demolition activities would be short-term and would not occur continuously for an extended duration (i.e., one year, or longer) in the immediate vicinity of nearby existing land uses. However, in comparison to ambient daytime noise levels, construction-generated noise levels at the nearest land uses would be detectable" (p. 4.13-13). This section does not include mitigation measures related to potential noise impacts to MRRPD facilities; however, mitigation measure PS-1, referenced below, attempts to set noise standards to reduce impacts to MRRPD facilities. Given the proposed noise levels provided in this section, the MRRPD may wish to consider requesting that construction activities that would result in significant noise levels occur when use of MRRPD properties are at their lowest.

AA-11 **3.1.14 Public Services and Recreation**

Section 4.15 of the Draft EIR assesses potential public services and recreation impacts associated with the project. The section provides background information on the MRRPD facilities within the project vicinity under subsection *f. Parking and Recreation* (p. 4.15-3). This section mentions that the Russian River at the project site includes State-owned sovereign land (held in trust by the California State Lands Commission) and public access to the Russian River will be maintained throughout construction.

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After reviewing this section, we believe the MRRPD should confirm the following information for accuracy (p.4.15-4 and 4.15-5):

- *The MRRPD has operated and maintained the Monte Rio Fishing Access facilities through an agreement with the State throughout most of the facilities' existence. In 2005, the State of California, through CDFW, and MRRPD signed a fifteen (15) year "Operating Agreement for Monte Rio Fishing Access." This agreement expired in 2020. CDFW and MRRPD are currently in coordination on a new agreement.*
- *The River Boulevard and Main Street properties currently have no specified use, however there are conceptual plans to develop them as a future camping area, with campsites accessible by boat, bikes, vehicles, and on-foot via a connection with the conceptual plans for a Dutch Bill Creek Trail continuation. Additional amenities proposed include day use picnic areas and park shelter.*

The discussions under Impact PS-1 and PS-2 note that the project would not result in substantial adverse physical impacts associated with the construction of new or physically altered fire facilities or police facilities, respectively, to maintain acceptable service ratio response times or other objectives (p. 4.15-10). The existing bridge is expected to remain open while construction of the new bridge is ongoing to allow for continued emergency response. Once completed, the replacement bridge is not anticipated to generate additional demand on emergency services, nor would it be expected to substantially reduce existing response times. However, this section does not explain what the estimated response time would be during construction. It's stated that in the event of temporary closure due to public safety concerns, mitigation measures are listed in Section 4.16 (Transportation and Traffic), specifically mitigation measures TRA-1 and TRA-2, that will ensure minimal impact on emergency service response times. The project construction operations would be required to comply with existing regulations regarding fire safety; therefore, a less-than-significant impact would occur (p. 4.15-10). Additionally, the County and its multijurisdictional partners are currently preparing an updated hazard mitigation plan and the Draft EIR notes the Public Review Draft was published in July 2021 (p. 4.15-6). Due to the passage of time since the Public Review Draft was published, the status of this document should be updated in the Draft EIR.

The discussion under Impact PS-4 notes that impacts to recreational facilities and functions adjacent to and near the project site that would impact service and other performance objectives are noted to either be temporary during construction or result in beneficial permanent impacts (p. 4.15-11). The section notes that there will be temporary and permanent impacts to recreational areas owned or leased by the MRRPD. Temporary impacts from construction staging, access, and publicly prohibited areas include approximately 3.13 to 5.05 acres over the three-year construction schedule. Permanent impacts are limited and include the replacement bridge piers on the beach outside the low flow channel on the north side of the river (approximately 0.009 acres), a column along the bank of Dutch Bill Creek (approximately <0.001 acre), and the proposed northern bridge approach within the Monte Rio Fishing Access parking area (approximately 0.06 acres), and the permanent right of way (ROW) adjacent to the northern bridge approach (approximately 0.04 acres). The proposed bridge structure and its associated ROW over the beach and river would be approximately 0.87 acres and 0.33 acres, respectively (p. 4.15-11).

Although limited during some portions of construction, it is stated that access to beach and river areas will remain open during construction, as would some parking at the Big Rocky Beach parking area. Access to the boat ramp would also remain open. In addition, during construction of the replacement bridge, the existing bridge would remain open. It is unclear when during the three-year construction period access to the beach and river areas would be limited, what parking at the Big Rocky Beach parking area would remain

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open during construction, and when traffic is expected to be temporarily restricted to a single lane. LACO believes that more information should be provided so that these details can be better understood.

This section notes that portions of Big Rocky and Sandy Beaches would be used temporarily during construction. Controlled access to the beach and river areas on the north side of the river would be provided through the Fishing Access and Boat Ramp parking lot staging area and beach access road/driveway during all phases of construction (p. 4.15-12). The period during which the Big Rocky and Sandy Beaches are to be temporarily used should be disclosed. It is noted that a traffic control flagger may be provided where public access and construction staging areas converge, as necessary (p. 4.15-12). In our professional opinion, this sentence should read "shall be provided..." rather than "may be provided". Access to Dutch Bill Creek Beach via the unimproved access road/pedestrian path would also be restricted during the first and second years of construction, but open during the third year of construction. Following construction, the pathway would be resurfaced, reducing erosion and sedimentation, and providing improved access for maintenance vehicles accessing the south side of the beach and river (p. 4.15-12). The section should note that this unimproved access road/pedestrian pathway at Dutch Bill Creek Beach serves as an ADA vehicular access point. Currently, persons with disabilities are able to request a key (or lock combination) at the MRRPD office in order to gain access to the locked gate and drive a vehicle with a boat trailer to the upstream side of the riffle. ADA access for fishing downstream of the riffle is via the existing ADA parking area adjacent to the existing boat launch.

This section should address how this service will be provided during construction, and if any impacts are anticipated. In addition, clarification should be provided as to whether the pathway would be used during the third year of construction. If not, explanation as to why the pathway would not be resurfaced during the third year should be provided as well as how long resurfacing would take.

As stated in the section, recreational water activities would be on-going during construction, although some areas used for construction, staging, and access would be restricted for safety. Additionally, a buffer around these areas would be implemented for additional public safety. These areas are referred to as "publicly prohibited areas" (p. 4.15-12). The MRRPD should be aware of these areas, as shown on Sheets 11 through 13 of the 35-Percent Design Plans (Appendix A) included for download with the Draft EIR. This section notes that river users wishing to pass downstream or upstream through the construction area during construction seasons two and three (when the gravel access pads would be installed in the river) would detour around the access pads by exiting the river, and using the beach, the beach parking access road through the MRRPD Community Center parking lot, and then to the boat ramp area to enter the river. River users wishing to pass through the construction area in the upstream direction would reverse this route. Signage would be provided to inform river users of changed conditions and direct them to a clearly defined route around the construction site.

The section notes that "recreational use of the river would be improved by removal of the existing bridge piers from the river channel post-construction" (p. 4.15-13). It is our professional opinion that this conclusion is reached while providing little to no justification. Upon further reading, it's noted that public access to the boat ramp west of the project site and restroom facilities across from the MRRPD Community Center would be maintained via the existing paved access road through the MRRPD Community Center parking lot and west of the Monte Rio Fishing Access parking area throughout the entirety of the construction period, with traffic control as needed (p. 4.15-13). It is concluded that since permanent impacts will improve and be beneficial to the recreational facilities and functions described, this impact will be less-than-significant without mitigation (p. 4.15-13). As previously mentioned, we believe little to no justification is provided.

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Under Impact PS-5, it is noted the project would result in permanent and temporary impacts to public parking facilities, where the impact would be less-than-significant with mitigation measure PS-1 incorporated (p. 4.15-13). The majority of the Monte Rio Fishing Access paved parking area to the south of the MRRPD Community Center would be used as a construction staging area year-round during the three-year construction period, though a portion of the Big Rocky Beach Parking area would remain open throughout construction and the County would provide for at least 100-percent replacement of parking throughout the construction period. (p.4.15-13). It is our interpretation that the County may replace more than 100-percent of the parking throughout the construction period. The proposed replacement parking should be provided and the impact to the replacement parking area should be discussed as well. The section also mentions that the Big Rocky Beach Parking lot supports an estimated 106 standard parking spaces though they are not delineated. During the first and second summer construction seasons, the Big Rocky Beach parking area east of the existing bridge would be available for parking. During the third summer construction season, a portion of the Big Rocky Beach parking area east of the existing bridge would be unavailable due to the removal of the existing bridge and parking would be reduced to an estimated 70 parking spaces (p. 4.15-13). An explanation of where this estimate came from should be provided.

This section notes that due to the location of the proposed replacement bridge's north abutment and approach, there would be a reduction of the CDFW-owned portion of the parking area (approximately 0.06 acres). The County has engaged with CDFW to determine the post-construction parking configuration where CDFW has requested that the County provide 100-percent of the existing parking post-construction. Currently, the County has met CDFW's request and final parking configuration will be subject to CDFW approval (p. 4.15-14). It should be noted that this would also affect MRRPD's parking availability. It is mentioned that during construction, parking within the CDFW portion of the Monte Rio Fishing Access parking area may be reduced by approximately 0.39 to 0.45 acres, depending upon the construction year. Based on conversations with MRRPD, the entrance to the parking lot tends to flood in moderate storms, and therefore, as a part of the proposed project, drainage improvements to the parking area will be included in project plans. The section also notes the County would resurface (pave) and restripe the entire Monte Rio Fishing Access parking area at the completion of the project and develop a temporary parking plan that would provide at least 100-percent of the existing parking for the duration of construction activities (subject to review and approval by MRRPD and CDFW) (p. 4.15-14). MRRPD should be aware that this would be subject to CDFW and MRRPD approval and that an estimate of when the temporary parking plan will be provided for review and approval should be requested.

The section notes that the County's goal is to provide 100-percent of existing parking for boat trailers during the fishing season (generally between October 1 and April 30, with specific fishing periods determined annually). This may include opening up portions of the parking area during certain dates through the construction process or finding alternative nearby off-site parking. CDFW review of demand would occur between April 30 to October 1 so the County can evaluate the needs and provide parking. Temporary impacts from construction staging to the MRRPD-owned portion of the Monte Rio Fishing Access parking area would be approximately 0.09 acres during each construction season and no permanent impacts are anticipated. Big Rocky Beach parking area would be temporarily affected while parking areas adjacent to the Monte Rio Community Center would not. The off-sets for temporary parking impacts during construction for CDFW would also off-set temporary parking impacts for MRRPD (p. 4.15-15). In addition, the benefits and/or how accurate a review of parking demand during the off season should be discussed. The section mentions the County will add delineated parking stalls at Big Rocky Beach parking area to increase parking capacity during the summer season (i.e., concrete wheel stops, signage, concrete markers, fabric strips

AA-11 affixed to the ground or other methods to be mutually agreed upon and subject to review and approval by MRRPD) (p. 4.15-16). MRRPD should be made aware of this proposed discussion and request it if not initiated prior to construction commencing.

The section states that with the implementation of mitigation measure PS-1, in addition to a replacement bridge over MRRPD beach and river areas that would meet current seismic safety standards, reducing the safety risk to beach users, the project includes a number of features that permanently improve MRRPD facilities (p.4.15-16). The mitigation measures are listed out in bullet points on p. 4.15-16 and 4.15-17 and LACO generally agrees with all of the proposed measures except for the following:

- *The removal of the existing bridge and its piers will open up the low-flow river channel, improving conditions for flood hydraulics, water recreation, and fisheries habitat. The soil around the existing piers has washed away, creating deep scour pools that can present a safety hazard to water users, as well as to the overall bridge structure. The replacement bridge was designed to clear-span the low-flow river channel, improving water recreational opportunities and fisheries habitat. (p.4.15-16)* The Draft EIR lacks discussion of what, if anything, will be done to the existing deep scour pools and the holes resulting from the existing piers. This discussion should mention whether these will be remediated/corrected, left as-is, etc.
- *The County would coordinate with MRRPD to determine if resurfacing and replacing the bollards along the path [to Dutch Bill Creek] is desired and develop a mutually agreed upon plan for MRRPD's review and approval (p.4.15-16).*

This is an important measure that requires input from the MRRPD for implementation.

The discussion under Impact PS-6 notes that the project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, as the project is not a growth inducing project and would not encourage significant public use of recreational facilities beyond the existing baseline of the current bridge. It is concluded that a less than significant impact would occur (p. 4.15-17). It was previously mentioned in this section that the bridge would provide better access to the beaches and improve water recreational opportunities as well as fisheries habitat. It is our professional opinion that additional justification for this determination is needed.

The discussion under Impact PS-7 states that the project will temporarily and permanently impact existing recreational facilities and that existing parking facilities will be altered as a result of the project. With mitigation measure PS-1 incorporated, a less-than-significant impact is expected to occur (p. 4.15-18). Please refer to our previous comments under Impacts PS-4 and PS-5. The section concludes that a cumulative impact would occur if growth in the service area requires physical expansion of facilities such as construction of new public or recreational facilities that would result in adverse physical impacts. The project does not meet these criteria and a less than significant impact would occur (p. 4.15-18). We agree that the impacts are not cumulative under the proposed project, but believe that additional justification throughout the section is needed, as previously discussed above.

AA-12 3.1.15 Transportation

Section 4.16 of the Draft EIR assesses potential transportation impacts associated with the project. We noted various deficiencies with the analysis contained within this section; however, it does not appear that any of the analysis contained within this section would significantly impact the MRRPD or MRRPD facilities.

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The discussion under Impact TRA-1 states that the project would not conflict with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and would not conflict or be inconsistent with CEQA guidelines section 15064.3. Therefore, it is concluded the impact would be less than significant (p. 4.16-5). The discussion of vehicle miles traveled (VMT) notes that the project is not a new development or growth inducing, indicating that a minor increase would be temporarily related to construction (p. 4.16-5). Under public transit facilities, it's noted that the project would not exceed available capacity (p. 4.16-5). Although the project would not exceed available capacity, as to how construction would affect the current route is not discussed.

Mitigation Measure TRA-1 states "The County shall notify property owners along Geysers Road at least 7 days in advance of the proposed temporary closure. Signage shall be placed at both ends of Geysers Road notifying motorists of the planned closure..." (p.4.16-7). As the project is not located along Geysers Road, we recommend this mitigation measure be revised.

The discussion under Impact TRA-2 notes that the project will not increase hazards due to geometric design features, or incompatible uses and the primary purpose of the project is to replace the current seismically at-risk bridge with a new bridge that is up to current safety design standards; therefore, a less-than-significant impact would occur (p. 4.16-7). Although valid, this does not directly address the impact statement. The section continues to discuss the most recent Caltrans Bridge Inspection Report which mentions a list of deficiencies observed (p. 4.16-7). All of the deficiencies were addressed later in the section except for the following:

"Geotechnical analysis indicates that the south side in particular is prone to liquefaction of multiple layers within the upper 100 feet of the ground surface. On the north side, several potentially liquefiable layers were encountered within the upper 35 feet of the ground surface" (p. 4.16-7).

It is our professional opinion that this deficiency should be addressed as well. Please refer to the discussion of Section 4.7 of the Draft EIR (Geology and Soils) for additional discussion of concerns related to the potential for liquefaction at the project site.

The discussion under Impact TRA-3 states that the proposed project would not result in inadequate emergency access and that the existing bridge would remain open while construction of the new bridge is occurring, with the incorporation of mitigation measure TRA-2 (p. 4.16-8). Mitigation measure TRA-2, which requires notification of the project construction schedule and any temporary closures, to emergency response organizations, that the contractor provide passage of emergency vehicles through the project site at all times, and that the contractor makes plans for emergency vehicle staging on the easterly approach if complete closure is determined necessary at any point in the construction schedule (p. 4.16-9). It is our professional opinion that the mitigation measure appears sufficient if staging on the easterly approach will provide enough room for emergency vehicles to pass through. We believe a meeting with emergency services to confirm the proposed plans are adequate should be required prior to notification of the project's construction schedule.

3.1.16 Wildfire

Section 4.19 of the Draft EIR assess the potential for the proposed project to exacerbate wildfire risks. While we believe the impact discussion lacks important details needed to justify the less than significant determinations under Impact WFR-1, such as the details from the discussion provided under Impact HAZ-4 in

Section 4.9 of the Draft EIR, we believe the potential impacts to MRRPD lands and facilities would be negligible.

3.1.17 Other CEQA Required Discussions

Section 5 of the Draft EIR pertains to other topics that must be assessed in a Draft EIR, including cumulative impacts, growth-inducing impacts, and irreversible environmental effects, including significant and unavoidable impacts. Although the discussions are short, they appear to include and describe what is required under the State CEQA Guidelines.

3.1.18 Project Alternatives

Section 6 of the Draft EIR addresses project alternatives. Section 15126.6 of the State CEQA Guidelines requires a reasonable range of alternatives to the project be considered, but does not give a specific number that must be assessed. The Draft EIR includes the required "No Project" alternative plus three others:

- Alternative 1: No Project
- Alternative 2: Retrofit of the Existing Bridge
- Alternative 3: Replace and Retain
- Alternative 4: Replace and Remove (5 preliminary alignment options analyzed)

Table 6-1 (Impact Comparison of Alternatives) does not compare impacts of all alternatives, only the proposed project, Alternative 1, and Alternative 2 (p.6-11).

The No-Project Alternative was found to have no impacts on beach recreation; however, higher potential for bridge failure during the 100-year flood event (p.6-4), which could limit access to MRRPD facilities. The No Project Alternative was identified as the environmentally superior alternative, as it would avoid or lessen the severity of the majority of impacts identified for the proposed project, but would result in greater impacts for several impact categories (p.6-9).

When the No Project Alternative is found to be the environmentally superior alternative, CEQA requires that the environmentally superior alternative amongst the other alternatives be identified (CEQA Guidelines §15126.6(e)). In this case, Alternative 4 (which was identified as the proposed project) was identified as the environmentally superior alternative (p.6-9 to 6-10).

The other alternatives were considered, but ultimately rejected, as they would not meet a majority of the project objectives, did not substantially reduce impacts compared to the proposed project, or were determined to be infeasible (p.6-6):

- Alternative 2 (Rehabilitation/Retrofit) - retrofitting the bridge was considered; however, the extensive modifications required to reinforce the bridge would significantly alter the look and character of the bridge, would cost more than replacement, would only partially meet design standards, would only meet a few project objectives, and have a short service life, so this alternative was rejected.
 - This analysis did not include an assessment of each individual impact category and how it compares to the level of impact anticipated under the proposed project.
- Alternative 3 (Replace and Retain) – this alternative would construct a separate bridge and retain the existing bridge, and retrofitting the existing bridge would be required. Additionally, the analysis states that impacts would all be similar or greater when compared to the project, but

- does not include a specific discussion of each impact. This alternative was rejected due to the costs, impacts to the character of the existing bridge, and impacts to the waterway (p.6-7).
- Alternative 4 (Replace and Remove) – It is noted that this particular alternative is in fact the project (p.6-7). It is further noted that the current alignment was selected as the preferred alignment by 87-percent of workshop participants at the January 2019 community meeting; however, it is unclear how many participants this included (p.6-8).

It is further noted that all of the alignment alternatives would traverse MRRPD lands (p.6-7). Two of the alternative alignments (“red” and “turquoise”) could potentially have fewer impacts on MRRPD’s beach areas because they are further downstream from the existing bridge and connect to Moscow Road, rather than Main Street or Bohemian Highway. However, they both would have greater impacts to the Monte Rio fishing access area, and the red alignment would specifically impact the boat ramp, which was funded with Land and Water Conservation Fund Act (LWCFA) funds and would require approval from Department of the Interior before removal (p.6-8).

Both the “red” and “turquoise” alignments were rejected due to engineering challenges, environmental constraints, higher costs, or because they do not meet the purpose and need of the project to service the needs of the community. Specifically, both the “red” and “turquoise” alignments by-pass main street stores, affect community cohesion, require additional intersections, increased cost to widen Moscow Road, difficult turning radius onto Moscow Road, and are too far for Monte Rio’s traditional Fourth of July activities and other annual events, which are celebrated from the MRRPD beaches and properties. Community input received during the various workshops and outreach described above also influenced the decision to move forward with the preferred project alignment (p.6-8).

AA-13 3.1.19 Appendices

As noted above, only one appendix (Appendix A – 35% Design Plans) is provided on the County’s website for review. The Draft EIR includes a robust references section at the end of the document, listing out specific documents, websites, etc. referenced for each respective topical area and section of the Draft EIR. Website links are provided; however, copies of specific documents or studies referenced in the Draft EIR are not provided. While the studies and particular documents are noted and summarized throughout the Draft EIR, it is typically standard practice to include copies of studies referenced throughout the Draft EIR as appendices (except for studies or documents that are of a confidential nature), for readers to be able to reference and review.

4.0 CONCLUSIONS

As provided throughout this Memo, in LACO’s professional opinion and standards of practice, we believe the Draft EIR prepared for the Bohemian Highway Bridge Over Russian River Replacement Project, dated April 2022, is lacking in detail and discussion and omits important project details. It appears that numerous determinations reached in the Draft EIR were conclusory and not supported by substantial evidence in the record. In LACO’s professional opinion, more discussion to explain how conclusions were reached is necessary within the Draft EIR. Additionally, as noted, in certain cases, additional detail would not only strengthen the findings in the Draft EIR, but also clarify the extent of potential impacts of the proposed project to the MRRPD and MRRPD facilities.



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
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Letter B

May 26, 2022

Mr. Jackson Ford
Sonoma County
2550 Ventura Avenue
Santa Rosa, CA 95403
Jackson.Ford@sonoma-county.org

Subject: Bohemian Highway Bridge over Russian River Replacement, Draft
Environmental Impact Report, SCH No. 2021030538, Sonoma County

Dear Mr. Ford:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a draft Environmental Impact Report (EIR) for the Bohemian Highway Bridge over Russian River Replacement Project (Project) pursuant to the California Environmental Quality Act (CEQA).¹

CDFW is submitting comments on the draft EIR to inform Sonoma County, as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project.

CDFW ROLE

The Project would affect **CDFW's Monte Rio Fishing Access** (MRFA), owned by CDFW. CDFW has an agreement with Monte Rio Recreation & Park District for MRFA operation which is currently subject to updates and renewal. Please continue to coordinate with Bay Delta Region Wildlife and Lands Program staff to ensure CDFW concerns are addressed and Project impacts to the fishing access are adequately mitigated.

CDFW is a **Trustee Agency** with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) 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 a California Endangered Species Act (CESA) Permit, a Lake and Streambed Alteration (LSA) Agreement, or other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources.

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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REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Permit 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 the potential to result in impacts to coho salmon (*Oncorhynchus kisutch*), a CESA listed as endangered species, and northern spotted owl (*Strix occidentalis caurina*), a CESA listed as threatened species, as further described below.** Issuance of a CESA Permit 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 a CESA Permit.

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, & 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 Fish and Game Code section 2080.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., 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 notification requirements. **The Project would impact the Russian River and Dutch Bill Creek; therefore, an LSA Notification is warranted, as further described below.** CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or CESA Incidental Take Permit (ITP)) until it has complied with CEQA as a Responsible Agency.

Raptors and Other Nesting Birds

CDFW also has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird),

Mr. Jackson Ford
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Page 3

3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION SUMMARY

Proponent: Sonoma County

Objective: Remove the existing bridge on the Bohemian Highway over the Russian River and construct a new bridge on an alternate alignment. The replacement bridge structure would be approximately 846 feet long and designed to meet the current seismic design standards.

Location: The Project is located along the Bohemian Highway where it crosses the Russian River and bounded by State Route 116 to the north, Main Street to the south, and the Russian River to the east and west. The Project is located within the census-designated place of Monte Rio, Sonoma County; at 38.466038 degrees latitude and - 123.009895 degrees longitude.

COMMENTS AND RECOMMENDATIONS

CDFW offers the below comments and recommendations to assist Sonoma County 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, in part through implementation of CDFW's recommendations, CDFW concludes that the proposed draft EIR is appropriate for the Project.

Mitigation Measures and Environmental Setting

Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)?

B-1

Comment 1: Section 4.4, pages 40-41

Issue: Mitigation Measure (MM) BIO-4 may not reduce impacts to riparian habitat to less-than-significant. Additionally, the Project may result in a violation of Fish and Game Code section 1600 et seq. because the draft EIR does not require Sonoma County to submit an LSA Notification to CDFW and comply with the related LSA Agreement, if issued, prior to Project construction.

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B-1

Specific impact: The Project would result in temporary impacts to 3.49 acres of riparian habitat along the Russian River and Dutch Bill Creek and the permanent loss of 0.04 acres of riparian habitat along these streams.

Why impact would occur: MM BIO-4 does not require: 1) a 3:1 mitigation to impact ratio based on the acreage and linear feet of impacts to riparian habitat, 2) adequate tree replacement ratios, and 3) Sonoma County to submit an LSA Notification to CDFW prior to initiation of Project activities.

Evidence impact would be potentially significant: Riparian habitat is of critical importance to protecting and conserving the biotic and abiotic integrity of an entire watershed. When riparian habitat is substantially altered, riparian functions become impaired, thereby likely substantially adversely impacting aquatic and terrestrial species. Removal of trees and other vegetation may significantly reduce suitable nesting and roosting habitat for many bird and bat species, such as pallid bat (*Antrozous pallidus*), a California Species of Special Concern, and causes the loss of important refugia for small mammals. Mature riparian trees and mid canopy vegetation would take considerable time to reestablish and grow to function. The Project may substantially adversely affect riparian habitat by temporarily impacting 3.49 acres, and permanently removing 0.04 acres, of riparian habitat, resulting in loss or degradation of this vulnerable habitat type. Therefore, Project impacts to riparian habitat would be potentially significant.

Recommended Mitigation Measures: To reduce impacts to less-than-significant, CDFW recommends that the draft EIR explicitly require the Project to submit an LSA Notification to CDFW and comply with the LSA Agreement if issued, prior to the initiation of Project activities. Additionally, CDFW recommends including the following language:

Habitat restoration shall occur in the same calendar year as the impact on-site or as close to the site as possible within the same stream or watershed and may consist of restoration or enhancement of riparian habitat. If mitigation is not possible within the same stream or watershed, mitigation ratios may increase at the discretion of CDFW. Temporary impacts to stream and riparian habitat shall be restored on-site.

To mitigate for the removal of trees, replacement trees shall be planted at the below minimum replacement to removal ratios:

- 1:1 for removal of non-native trees;
- 3:1 for removal of native trees (excluding oak (*Quercus* sp.) trees);
- 4:1 for removal of oak trees between 5 and 10 inches in diameter;
- 5:1 for removal of oak trees between 11 and 15 inches in diameter; and
- 10:1 for removal of oak trees greater than 15 inches in diameter

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B-1

Replacement tree plantings shall consist of 5-gallon or greater saplings and locally-collected seeds, stakes, or other suitable nursery stock as appropriate, and shall be native species to the area adapted to the lighting, soil, and hydrological conditions at the replanting site. If acorns are used for oak tree replanting, each planting will include a minimum of three acorns planted at an approximately two-inch depth to minimize predation risk. Large acorns shall be selected for plantings. Replacement oaks shall come from nursery stock grown from locally-sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they are planted.

The Permittee shall monitor and maintain, as necessary, all plants for five years to ensure successful revegetation. Planted trees and other vegetation shall each have a minimum of 85 percent survival at the end of five years. If revegetation survival and/or cover requirements do not meet established goals as determined by CDFW, Permittee is responsible for replacement planting, additional watering, weeding, invasive exotic eradication, or any other practice, to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for five years after planting.

CDFW also recommends revising the fifth bullet in MM-BIO 4 to read as follows (**additions in bold**):

Mitigation for permanent impacts to riparian habitat will be accomplished through one or more of the following: (1) on-site mitigation; (2) the purchase of in-lieu fees **if this option is approved by CDFW**; (3) off-site mitigation; and/or (4) purchase of **CDFW-approved in-kind** mitigation bank credits. In any case, replacement mitigation will be at a minimum ratio of 3:1 **based on area and linear distance** for permanent impacts and 1:1 **based on area and linear distance** for temporary impacts and may include exotic plant removal and riparian species revegetation, depending on the selected scenario and location.

Please be advised that CDFW may not accept in-lieu fees as an appropriate method to mitigate impacts to riparian habitat.

Mandatory Findings of Significance: Does the Project have the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

B-2

Comment 2: Section 4.4, pages 16, 17, 33, 34, 41

Issue: MM BIO-7 may not reduce impacts to coho salmon to less-than-significant.

Specific impact: The project may result in impacts to coho salmon including take in the form of catch, capture, or mortality and a violation of CESA.

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B-2

Why impact would occur: MM BIO-7 requirements for salmonid mitigation do not: 1) provide adequate measures to mitigate impacts to coho salmon to less-than-significant, and 2) require Sonoma County to obtain a CESA ITP from CDFW prior to initiation of Project activities. According to Section 4.4, pages 16-17, the Russian River and Dutch Bill Creek are known spawning and rearing streams for coho salmon and portions of these streams within the biological study area are considered designated critical habitat for coho salmon. According to Section 4.4, pages 33-34, the Project could result in direct impacts to coho salmon during in-water work.

Evidence impact would be significant: Coho salmon qualifies as an endangered animal under CEQA because it is listed as endangered under CESA and the federal Endangered Species Act (ESA) (CEQA Guidelines, § 15380). California coho salmon have been in serious decline since the mid-20th century largely due to habitat loss. The risk of extinction has increased since the species was listed as endangered under the federal ESA in 2005. If coho salmon is present within the Project site during construction, the Project could result in take of the species and a substantial reduction in its population, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measures: To reduce impacts to less-than-significant, CDFW recommends that if take of coho salmon cannot be avoided by the Project, Sonoma County shall obtain a CESA ITP prior to the initiation of Project activities, as a condition of project approval. As part of the ITP process, full mitigation for impacts to coho salmon would be required and any proposed mitigation would need to be approved by CDFW. CDFW Bay Delta Region staff is available to provide guidance on the ITP application process. The project shall also obtain authorization from the USFWS/National Marine Fisheries Service for impacts to coho salmon before starting Project activities.

B-3

Comment 3: Section 4.4, page 44-45

Issue: MM BIO-10 may not reduce impacts to northern spotted owl (NSO) to less-than-significant.

Specific impact: The Project could result in impacts to nesting NSO including mortality of young and a violation of CESA.

Why impact would occur: The Project is within and near potential nesting habitat for NSO. The closest NSO occurrences documented in the California Natural Diversity Database (CNDDDB) are less than 0.8 miles southwest and east of the Project, and there are additional documented NSO occurrences within the Project vicinity. Although typically associated with old-growth or mature forests, NSO can utilize a wide variety of habitat types, including oak woodlands. They exhibit flexibility in their use of different

Mr. Jackson Ford
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B-3

forested areas for nesting, roosting, and feeding requirements. Typical habitat characteristics include a multi-storied structure and high canopy cover. The Project may cause adverse impacts to NSO, such as disturbance from elevated sound levels or human presence near nest sites.

Evidence impact would be significant: NSO qualifies as a threatened animal under CEQA because it is listed as threatened under CESA and the federal ESA (CEQA Guidelines, § 15380). If NSO are nesting on or near the Project site during construction, the Project could result in take of the species and a substantial reduction in its population, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measures: To reduce impacts less-than-significant, CDFW recommends that no Project activities within 0.25 miles of NSO nesting habitat shall occur from March 15 to August 31, unless NSO surveys have been completed by a qualified biologist following the USFWS *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls*, dated (revised) January 9, 2012 and the survey report is accepted by CDFW in writing. If breeding northern spotted owls are detected during surveys, a 0.25-mile no-disturbance buffer zone shall be implemented around the nest. NSO surveys shall be conducted for each year Project construction occurs. No Project activities shall occur within the buffer zone until the end of breeding season, or a qualified biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. Alternate buffer zones may be proposed by a qualified biologist after conducting an auditory and visual disturbance analysis following the USFWS guidance, *Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California*, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW. Survey results shall be provided to the Spotted Owl Observations Database at <https://wildlife.ca.gov/Data/CNDDDB/Spotted-Owl-Info>). If NSO are detected, CDFW and the USFWS shall be immediately notified. If Project activities may impact NSO, the project shall apply for and obtain an ITP from CDFW, as well as authorization from the USFWS, before starting project activities.

Please be advised that an LSA Agreement obtained for this Project would likely require the above recommended mitigation measures, as applicable.

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 CNDDDB. The CNDDDB field survey form,

Mr. Jackson Ford
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Page 8

online field survey form, and contact information for CNDDDB staff can be found at the following link: <https://wildlife.ca.gov/data/CMNDDDB/submitted-data>.

FILING FEES

CDFW anticipates that the project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR to assist Sonoma County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to James Hansen, Environmental Scientist, at James.Hansen@wildlife.ca.gov or (707) 576-2869; 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

ec: State Clearinghouse No. 2021030538

John Krause, CDFW Bay Delta Region, John.Krause@wildlife.ca.gov

Greg Martinelli, CDFW Bay Delta Region, Greg.Martinelli@wildlife.ca.gov

Letter C

From: [Ed Fortner](#)
To: [Jackson Ford](#)
Cc: [Samuel Baumgardner-Kranz](#); [Gaylord Schaap](#); [Hundley, Rachel](#); [Elise Weiland](#)
Subject: RE: Monte Rio Bridge
Date: Monday, April 11, 2022 8:15:15 AM
Attachments: [image006.png](#)
[image007.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image013.png](#)
[Sweetwater Springs Water District resonses to EIR.docx](#)

EXTERNAL

Jackson,

C-1

I see in the EIR that Sweetwater Springs Water District is described as a “privately owned water district.” As you can see in the excerpts from the EIR draft with my comments in red, we are a Public Water District with a duly elected Board of Directors. Also, the District has

C-2

been making informal and formal information requests for some time, looking for any agreement between the County and the District related to the Bridge and the water main attachment. If any such agreement exists, we need to see it right away. I wonder if the agreement (if it exists) was with the private water company “Russian River Water Company,” which is no longer in existence that ultimately became part of Sweetwater. The District was established in 1988, and as you know, the existing bridge was built in 1933. Also, the reference to “County-owned bridge” is accurate, but the original owner was a CDOT entity.

C-3

Also, in the Sonoma County General Plan, I see the Goal PF-1 that gives the “highest priority for water and sewer improvements...including Monte Rio/ Sweetwater Springs.” I hope this means that the County will share significant funding for our water main attachment to the new bridge.

Please advise.

Sincerely,

Ed Fortner
General Manager
Sweetwater Springs Water District
efortner@sweetwatersprings.com
<http://www.sweetwatersprings.com/>
707-869-4000



From: Jackson Ford <Jackson.Ford@sonoma-county.org>

Sent: Thursday, April 7, 2022 2:17 PM

To: Ed Fortner <efortner@sweetwatersprings.com>

Cc: Samuel Baumgardner-Kranz <Samuel.Baumgardner-Kranz@sonoma-county.org>

Subject: RE: Monte Rio Bridge

Hello Ed,

Apologies for not including you on the mailer, I have added your email to our interested parties list for future circulation. The Project description has a paragraph discussing relocation of utilities. Section 4.18, *Utilities and Service Systems*, determines “Removal and relocation of all utilities will be done in coordination with all applicable utility providers and done in accordance with all applicable regulations. There would be no significant environmental effects associated with the removal and relocation of utilities.” I believe Utility Coordination typically occurs in the next phase of the project, during the Right-of-Way. Please contact Samuel Baumgardner-Kranz for technical details regarding the placement of various utilities on the replacement bridge.

Thank you,

Jackson Ford
Senior Environmental Specialist

County of Sonoma | Planning | Natural Resources

2550 Ventura Avenue, Santa Rosa, CA 95403

Direct: 707-565-8356 | Office: 707-565-1900



www.PermitSonoma.org

Due to the Public Health Orders, online tools remain the best way to access Permit Sonoma’s services like permitting, records, scheduling inspections, and general questions. You can find out more about our extensive online services at PermitSonoma.org.

The Permit Center has reopened with limited capacity Monday, Tuesday, Thursday, Friday from 8:00 AM – 4:00 PM; Wednesday, 10:30 AM – 4:00 PM.

Thank you for your patience as we work to keep staff and the community safe.

From: Ed Fortner <efortner@sweetwatersprings.com>

Sent: Thursday, April 07, 2022 8:39 AM

To: Jackson Ford <Jackson.Ford@sonoma-county.org>

Subject: Monte Rio Bridge

EXTERNAL

Jackson,

Please include me on future correspondence related to the Monte Rio Bridge. If you are not aware, Sweetwater will be constructing an eight inch ductile iron water main to the new bridge and has the same water main attached to the existing bridge. I saw no mention of this in the project description. Please advise.

Sincerely,

Ed Fortner
General Manager
Sweetwater Springs Water District
efortner@sweetwatersprings.com
<http://www.sweetwatersprings.com/>
707-869-4000



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Sweetwater Springs Water District

The commenter has concerns regarding water main relocation. Water main serves 1000 residents. Cost estimate is \$850,000.00. Cost impacts to disadvantages communities, Late notification does not allow for budgeting, EIR should address significant impact to community and environmental justice issues. EIR should address mitigation for water supply system, specifically utility relocation, cost of abandonment of existing water mains, and new connections to new water main.

See Section 4.18, *Utilities and Service Systems*, for details regarding water and wastewater capacity. Comment noted. The comment does not pertain to the scope of the EIR. It will be considered by the decision makers prior to a decision on the project. Sweetwater springs is a privately owned water district, and they have entered into an agreement with the County for the use of the County's bridge to carry their facilities. The County is abiding by all terms of the agreement. The costs will be borne by the appropriate parties as indicated by the agreement. The County is coordinating with Sweetwater springs to provide any information they need to plan for the relocation, and the project is being conducted in a manner to insure continued operation of their water system.

C-1

Sweetwater Springs Water District is a Public Water District with a duly elected Board of Directors. The District is not aware of ANY agreement with the County as to the use of the County's bridge. We expect to see this agreement immediately if it exists.

Ed Fortner- Sweetwater Springs, General Manager, concerned about \$800k + price tag for moving water line. Looking for ways to mitigate costs. Mentioned they are a disadvantaged community and environmental justice is a consideration, hopes a federal grant can cover the cost. Said Sweetwater Springs had not been contacted prior to Feb 2021, so had no advance warning or time to get together funds to move. Had talked to prior GM (Steve Mack) who also said no one had contacted Sweetwater.

Sukey Robb-Wilder- Vice President of Sweetwater Springs- repeated concerns about bridge lane widths and traffic issues, parking concerns. Also rate increase for water due to high costs of moving Sweetwater Water line. Stated will impact "disadvantaged, underserved community." Wants to know what was done to outreach to utilities.

Sukey Robb-Wilder- reinforced concerns about Sweet Water Springs Water District, supports water to whole community. **Rich Holmer**- Wants document to address the Natural Environment, Birds nesting on Bridge and loss of riparian vegetation.

Sonoma County

4.10-6

Bohemian Highway Bridge over the Russian River Replacement Project

Groundwater b. Water Supply Groundwater Recharge

Water quality in Sonoma County varies depending on the underlying groundwater basin. Factors that contribute to the decline of groundwater quality include percolation of agricultural runoff contaminated with fertilizers and pesticides into the water table; percolation of water from public and private sewage treatment systems; and percolation of contaminated urban runoff.

The Project lies within the Lower Russian River Valley Groundwater Basin (Basin No. 1-60). The Lower Russian River Valley Groundwater Basin covers 6,600 acres of Sonoma County and has a total storage capacity of 55,000 acres-feet (California Department of Water Resources 2003).

The Lower Russian River Valley basin, which underlies the Project site, has measured water quality impairments of primary and secondary inorganics as well as radiological constituents (DWR 2004a).

According to the Project's Preliminary Foundation Design Information Memo (Parikh, 2020), groundwater was observed in the river during drilling in September 2019. Groundwater may vary with the passage of time due to seasonal groundwater fluctuation and the proximity to creeks, surface and subsurface flow, ground surface run-off and other factors that may not be present at the time of the investigation. It is assumed that groundwater level is at elevation 5 feet for the Project design.

The Sweetwater Springs Water District (SSWD) serves the areas adjacent to the Project site. The District's water supply comes from wells near the Russian River and the distribution facilities consist of two separate water systems: one in Guerneville with three wells and the other in Monte Rio with two wells. The District's water distribution system is a result of water lines being installed over the last 100 years. Although the water system has been upgraded over the years, major upgrade construction projects have been taking place since SSWD acquired the water system. The Sweetwater Springs Water District serves approximately 3,600 accounts (95% residential) comprised of about 9,000 persons.

According to the Sonoma Water Agency, there are two major reservoir projects that provide the water supply for the Russian River watershed: Lake Mendocino on the East Fork of the Russian River and Lake Sonoma on Dry Creek. Lake Mendocino and Lake Sonoma are dual-purpose reservoirs, since they provide flood protection managed by the U.S. Army Corps of Engineers and Sonoma Water manages the water supply storage. The Basin Plan identifies the Russian River Hydrologic Unit as having the beneficial use of domestic supply.

During and after a storm event, rainfall may infiltrate into the ground surface, and move down through the soil as groundwater recharge. Land areas vary in their capacity to recharge based on soil conditions and the underlying geology. In Sonoma County, rivers and stream corridors are important sources for groundwater recharge, as are areas underlain by permeable geologic formations.

Environmental Impact Analysis

Draft Environmental Impact Report 4.10-7

Hydrology and Water Quality

Groundwater generally occurs in geologic formations with high water-holding capacity (aquifers) on a local scale, and groundwater basins on a regional scale. Contiguous aquifers allow groundwater to migrate between them, and sometimes multiple aquifers occur, separated by less permeable or impermeable (clay) layers called aquacludes.

Groundwater is an important source of agricultural, industrial, and domestic water supply in the Project area. It is accessed through wells drilled into the zone of saturation. Recharge of groundwater typically occurs along the major streams and their principal tributaries. The principal water bearing formations in Sonoma County groundwater basins are typically alluvium, a deposit of clay, silt, sand, and gravel left by flowing streams in a river valley.

Urban Water Management Planning Act In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code, Section 10610 et seq.), which requires urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies. This Act also requires the provision of water service to be affordable to lower income households (Section 10631.1). Every five years, water suppliers are required to develop Urban Water Management Plans (UWMP) to identify short- term and long-term water demand management measures to meet growing water demands. Sweetwater Springs Water District current UWMP was updated in June 2021.

- a. **Water Supply** Various water districts provide water supply service in unincorporated Sonoma County. The Project site is served by the Sweetwater Springs Water District.

Sonoma County General Plan The County General Plan was adopted by the Sonoma County Board of Supervisors Resolution 08- 0808 on September 23, 2008. The County General Plan includes broad goals and policies aimed at protecting the county’s water supply and water quality and ensuring adequate water service is available. **Goal PF-1: Assure that water and wastewater services are available where necessary to serve planned growth and development without promoting unplanned growth.**

C-3

Objective PF-1.3: Limit extension of public water and sewer services into rural areas. **Policy PF-1c: Give the highest priority for water and sewer improvement planning to those service providers whose capacity for accommodating future growth is most limited. These include the** Occidental County Sanitation District, the Geyserville Water Works and Geyserville Sanitation Zone, the **Sweetwater Springs Water District, Monte Rio**, the Town of Windsor (water supply to the Airport Industrial Area), the California American Water Company (Larkfield- Wikiup), the Airport-Larkfield-Wikiup County Sanitation Zone, the Valley of the Moon Water District, and the Sonoma Valley Sanitation District, or any entities which may succeed these service providers.

Sweetwater Springs Water District (SSWD). 2016. 2015 Urban Water Management Plan. October 2016. https://wuedata.water.ca.gov/public/uwmp_attachments/3037381827/Urban%20Water%20Mgmt%20Plan%20-%202015%20FinalR.pdf (accessed December 2021).

Letter D

From: [Newell, Justin](#)
To: [Jackson Ford](#)
Subject: FW: Bohemian Highway Bridge over Russian River Replacement Project
Date: Friday, April 08, 2022 8:36:26 AM
Attachments: [image001.png](#)
[Sonoma mail.pdf](#)

Good Morning Jackson,

D-1

PG&E received the attached notice of availability for the Bohemian Highway Bridge replacement project. I am contacting you to understand if the county has identified any conflicts between this project and PG&E facilities. Also, I was wondering if you would be able to send me the plan set for the replacement bridge. In the notice we received I only have a vicinity map to reference and review.

Thank you,

Justin Newell | Land Agent | Land Rights Records
Pacific Gas and Electric Company
916-594-4068



Click here to access the [PG&E Greenbook](#)

Click here to [Submit an Application](#)

Click here to access [Customer Connections Online](#)

From: Larrabee, Craig <CJLc@pge.com>
Sent: Tuesday, April 5, 2022 6:37 PM
To: PGE Plan Review <PGEPlanReview@pge.com>
Subject: Sonoma mail

TO PGE PLAN REVIEW

Here is some Sonoma mail.

Craig

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April 4, 2022

**NOTICE OF AVAILABILITY
of a Draft Environmental Impact Report
and Notice of Virtual Public Hearing**

Project Title: Bohemian Highway Bridge over Russian River Replacement Project
Project Proponent: Sonoma County
Project Location: Community of Monte Rio
Hearing Date: May 17, 2022
Hearing Body: Sonoma County Board of Supervisors
Hearing Location: Online. Visit <https://sonoma-county.legistar.com/Calendar.aspx> for details.
DEIR Review Period: April 4, 2022 through May 18, 2022

The Sonoma County Permit and Resource Management Department (Permit Sonoma) has prepared a Draft Environmental Impact Report (EIR) for the Bohemian Highway Bridge over the Russian River, in the community of Monte Rio, CA. The County is the lead agency under the California Environmental Quality Act (CEQA) for the project. The intent of this Notice of Availability (NOA) is to notify interested parties that the Draft EIR is available for public review and comment.

Project Location: The project is located within the Community of Monte Rio, Sonoma County, California.

Project Description: The County proposes to remove the existing bridge on the Bohemian Highway over the Russian River and construct a new bridge on an alternate alignment (Figure 2). The replacement bridge structure would be approximately 846 feet long and composed of the following:

- The south approach would be a continuous cast-in-place concrete post-tensioned slab structure with three spans ranging from 60 to 65 feet long.
- The main span over the Russian River would be a 390-foot long steel tied arch structure. The peak of the arch would be approximately 65 feet high above the deck.
- The north approach would be a continuous cast-in-place concrete post-tensioned box girder structure with three spans ranging from 80 to 85 feet long.

The proposed bridge would be designed to meet the current AASHTO bridge design standards and the seismic design would be in accordance with the Caltrans Seismic Design Criteria and Seismic Design for Steel Bridges. The bridge would vary in width, from approximately 52 feet at the approaches to approximately 60 feet at the main span. The bridge would be supported on concrete piers with deep,



large diameter cast-in-drilled-hole piles, embedded up to approximately 120 feet below the riverbed. Rock slope protection (RSP) would be installed at both abutments for scour protection.

The proposed roadway would be designed to provide a multimodal route for vehicles, bicycles, and pedestrians. The proposed alignment for the Bohemian Highway Bridge would connect to Main Street west of the existing bridge and east of Moscow Road, and terminate at SR 116 to the north. The proposed roadway cross section (Figure 3) would accommodate two 12-foot vehicular lanes (one lane in each direction), concrete barriers, the steel arch members, and 5-foot shoulders/Class II bike lanes and 6-foot pedestrian sidewalks on both sides of the bridge.

The Project construction is estimated to be completed over three consecutive years. Traffic will continue to use the existing bridge in years one and two. For the third year, traffic would be switched to new bridge as the old structure is deconstructed. Construction would occur year round, with in channel and over water work occurring in the low flow summer months. Construction related Best Management Practices will avoid or minimize environmental impacts associated with the Project.

Potential Environmental Effects of the Project: The Draft EIR finds that implementation of the project could result in significant and unavoidable impacts related to cultural resources. The Project proposes to remove and replace an existing bridge that is a Sonoma County Local Historic Landmark, and has a zoning designation of HD as part of the Sonoma County Historic Bridges Thematic District. Impacts in all other areas were found to be less than significant or less than significant with incorporation of mitigation measures. The draft EIR provides a detailed project description, an analysis of physical environmental effects of the project, and an identification of feasible mitigation measures and alternatives that would avoid or lessen the severity of project impacts.

Availability of the Draft EIR: The Draft EIR will be available for review at this website: <https://share.sonoma-county.org/link/-GpVd8je3rY/>. A physical copy of the Draft EIR will be available at the Permit Sonoma offices, 2550 Ventura Avenue, Santa Rosa, CA 95403. Electronic versions on flash drives or printed copies may be mailed upon request, at cost. To arrange payment and request a flash drive or printed copy of the Draft EIR or any of the documents referenced therein, contact Jackson Ford, at Jackson.Ford@sonoma-county.org or (707) 565-8356.

EIR Public Review Period: The Bohemian Highway Bridge over the Russian River Environmental Impact Report (EIR) is available for a public review period of 45 days, **commencing April 4, 2022 and ending May 18, 2022**. All comments on the Draft EIR must be submitted during the public review period.

Please submit written comments by 5:00 p.m. on May 18, 2022:

- Email: Jackson.Ford@sonoma-county.org
- Phone: (707) 565-8356
- Regular Mail: Jackson Ford, Permit Sonoma, 2550 Ventura Avenue, Santa Rosa, California 95403

For comments submitted via email, please include “Draft EIR Comments: Bohemian Highway Bridge over the Russian River” in the subject line and the name and physical address of the commenter in the body of the email.

Public Hearing on Draft EIR: The Sonoma County Board of Supervisors will hold a virtual public hearing on **Tuesday, May 17, 2022**. The purpose of the public hearing is for the Board of Supervisors and Permit Sonoma staff to receive comments on the adequacy and accuracy of the EIR. The BOS will not respond to any of the comments or take action on the project at this hearing. Certification of the Final EIR will be

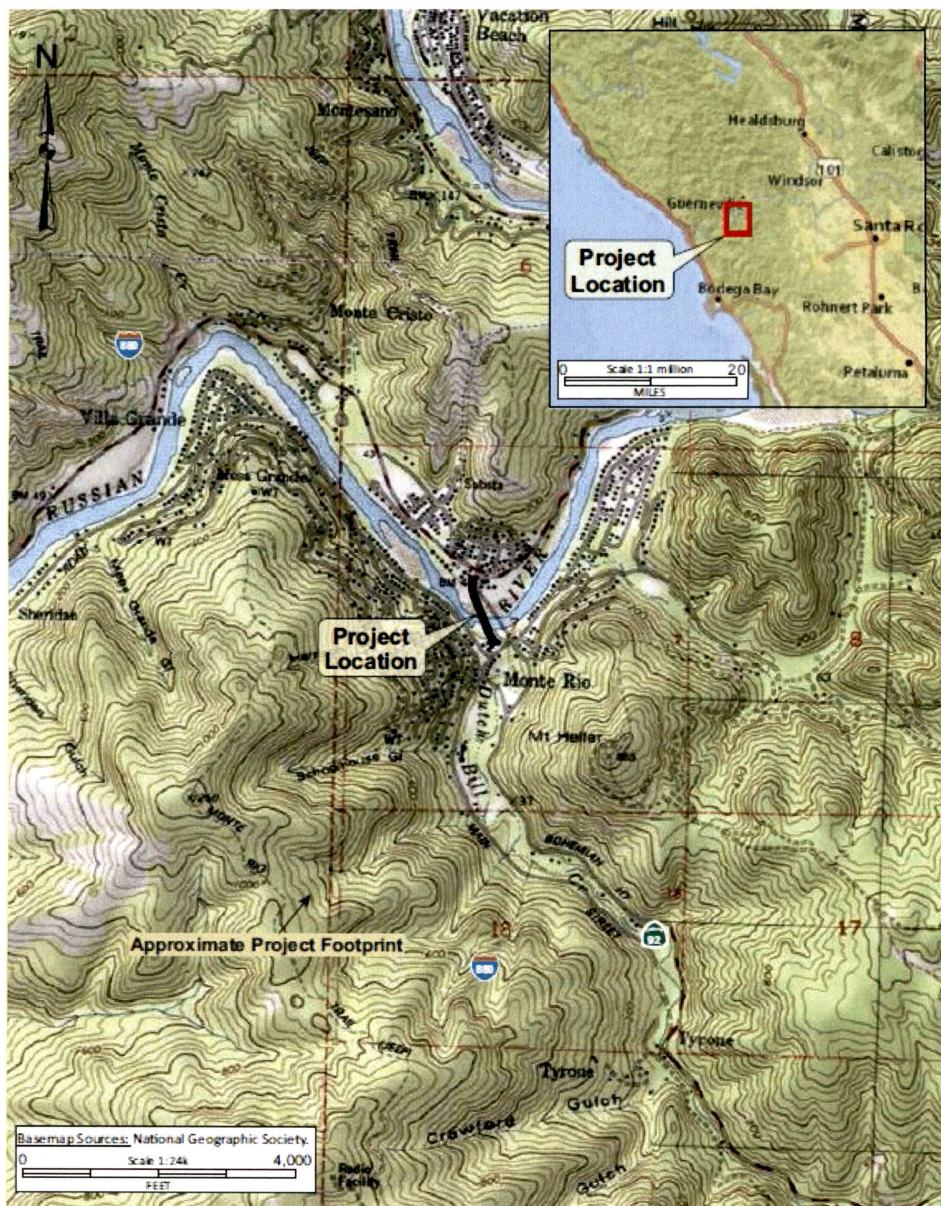


considered at a later hearing. Contact Jackson Ford (Jackson.Ford@sonoma-county.org or (707) 565-8356) if you wish to be on the mailing list for future notices.

In accordance with AB 361, Governor Newsom’s March 4, 2020 State of Emergency due to the COVID-19 pandemic, Sonoma County Public Health Officer’s Recommendation for Teleconferenced Meetings, and the Sonoma County Board of Supervisors Resolution 21-0399, the May 17, 2022 Board of Supervisors meeting will be held virtually.

Members of the public who join the Zoom meeting, either through the Zoom app or by telephone, will have an opportunity to provide live comments during the hearing. Please refer to the meeting agenda for instructions on how to join the meeting via the Zoom app or by telephone. The agenda will be posted one week prior to the hearing date located: <https://sonoma-county.legistar.com/Calendar.aspx>

Figure 1: Project Location





26010101
 SONOMA COUNTY
PERMIT AND RESOURCE MANAGEMENT
 2550 Ventura Avenue, Santa Rosa, CA 95403-2829
 RETURN SERVICE REQUESTED



U.S. MAIL
 PITNEY BOWES
 ZIP 95401 \$ 000.53⁰
 02 1W
 0001389748 APR 04 2022

PACIFIC GAS & ELECTRIC CO
 C/O B E NELSON/DIRECTOR ST & LOCAL
 TAXES
 PO BOX 770000 SAN FRANCISCO CA 94177-
 0001



Letter E

From: [Brenda Adelman](#)
To: [Jackson Ford](#)
Subject: Re: Bohemian Hwy Bridge Replacement NOA Legal Notice in Monte Rio
Date: Wednesday, April 06, 2022 4:44:29 PM

EXTERNAL

I'll send the notice to all my friends.

Sent from my iPad

On Apr 6, 2022, at 9:26 AM, Brenda Adelman <rrwpc@comcast.net> wrote:

Thank you for information. It would be a good idea to advertise in the Gazette and put up notices beyond the communities of MOnTe Rio and Villa Grande, if you have not done so already. That bridge is used area wide and not just by the local community.

Brenda

Sent from my iPad

On Apr 6, 2022, at 9:14 AM, Jackson Ford <Jackson.Ford@sonoma-county.org> wrote:

Good morning Brenda,
Here is the link to the DEIR posted to the County Website, if you have any issues opening please let me know so I can try to get the document to you another way.

<https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Environmental%20Notices/Notices%20of%20Preparation%20of%20Draft%20Environmental%20Impact%20Reports/Bohemian-Highway-Bridge-Draft-Environmental-Impact-Report.pdf>

Thank you,
Jackson Ford
Senior Environmental Specialist

County of Sonoma | Planning | Natural Resources
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-8356 | Office: 707-565-1900

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<[image003.png](#)>
<[image004.png](#)>

<[image006.jpg](#)>

www.PermitsSonoma.org

Due to the Public Health Orders, online tools remain the best way to access Permit Sonoma's services like permitting, records, scheduling inspections, and general questions. You can find out more about our extensive online services at PermitsSonoma.org.

The Permit Center has reopened with limited capacity Monday, Tuesday, Thursday, Friday from 8:00 AM – 4:00 PM; Wednesday, 10:30 AM – 4:00 PM.

Thank you for your patience as we work to keep staff and the community safe.

From: Brenda Adelman <rrwpc@comcast.net>
Sent: Tuesday, April 05, 2022 3:30 PM
To: Jackson Ford <Jackson.Ford@sonoma-county.org>
Subject: Re: Bohemian Hwy Bridge Replacement NOA Legal Notice in Monte Rio

EXTERNAL

I received the notice about this project and would like to view the DEIR and picture of the bridge. Can you email copy or link for this information? Thank you.

Brenda Adelman

Sent from my iPad

On Apr 4, 2022, at 3:55 PM, Amy Loukonen <Amy.Loukonen@sonoma-county.org> wrote:

Greetings,

Please find the attached Legal Notice regarding the project in the subject line. Please contact the project planner, Jackson Ford with any questions you may have at Jackson.Ford@sonoma-county.org.

Thank you,

Amy Loukonen
Senior Office Assistant
www.PermitsSonoma.org

County of Sonoma
Planning Division | Natural Resources
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-6186 | Office: 707-565-1900
Fax: 707-565-1103

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Letter F

From: [christmas leubrie](#)
To: [Jackson Ford](#)
Cc: [Scott Orr](#); [Cecily Condon](#); [Jennifer.Klein@sonomacounty.org](#); [Sita Kuteira](#); [Christa Shaw](#); [Ivan Jimenez](#); [Christine Sosko](#); [Jennifer Lyle](#); [Leslye Choate](#); [Lisa Steinman](#); [Tiffany Seder](#); [Mark Cleveland](#); [Steve Ehret](#); [Charles Rivers](#); [FirePrevention](#); [Robert ODell](#); [Steve Mosiurchak](#); [Steve Baxman](#); [Calvin Sandeen](#); [Ethan Brown](#); [Lauren Cartwright](#); [Steven Schmitz](#); [Eric Gage](#); [WEBSCTA](#); [Leo Chyi](#); [Belén Grady](#); [Eric Koenigshofer](#); [Milo Baker Chapter Conservation Comm.](#); [US Army Corps General Box \(CESPN-Regulatory-Info@usace.army.mil\)](#); [Ryan Olah](#); [Elizabeth Solorzano](#); [Janice Oakley](#); [Lareina Earls](#); [Brendan O'Neil](#); [Gary Shannon](#); [Mona Dougherty](#); [John Mack](#); [damien olson](#); [viraneverends@yahoo.com](#); [Franceen Levy](#); [cystrecker@yahoo.com](#)
Subject: Renewed Opposition to Bohemian Hwy Bridge Replacement (NOA Legal Notice in Monte Rio)
Date: Thursday, April 07, 2022 11:47:47 PM

EXTERNAL

F-1, F-2

Dear engineers and planners of the Monte Rio Bridge,

When we were informed about the new bridge in your planning meetings about it here, we, Monte Rio residents, were told by these engineers that our beloved old bridge could not be saved (as the old Guerneville bridge had been when a new highway bridge was built there) since our two Monte Rio bridges (our current beloved iconic bridge and the proposed new modern bridge) could not exist simultaneously. This required a huge wide bridge necessitated by requiring additional walking and bike lanes to replace our old bridge. (This proposed bridge is completely out of scale for our tiny town.) We were told we allegedly couldn't save our old bridge as a biking and walking bridge as allegedly the two bridges would share a common footprint, and they were therefore incompatible. Now we are being told that the old bridge will be demolished AFTER the new bridge is complete.

Therefore, as you well know: We want our old beloved Monte Rio bridge to stay in place, just as Guerneville was able to do with their old bridge. It seems to us that we were lied to by the folks trying to force this new bridge on us. It also is clear that the proposed new enormous bridge is overly large, as our old bridge, when saved, would remove the need for this huge, over-designed, extremely wide, proposed new bridge. We could then have a safely separate bike and pedestrian bridge and a much smaller width bridge for the cars and vehicles, saving considerable funds, which should be of interest in these challenging financial times. We need to immediately go back to the drawing board to rectify the wildly unnecessary over-engineering of this new proposed vehicle bridge.

I'll be very interested to hear the new novel explanation for the lies we were told when this whole new bridge scheme was forced on our town. I don't believe anything we were told now, as it's clear we were being maneuvered in a major, doubtless planned scheme.

Please respond. Don't be surprised by real, serious Monte Rio opposition.

Sincerely Christmas Leubrie, Monte Rio homeowner and full time resident
Sent from my iPad

On Apr 4, 2022, at 3:53 PM, Amy Loukonen <Amy.Loukonen@sonoma-county.org> wrote:

Greetings,

Please find the attached Legal Notice regarding the project in the subject line. Please contact the project planner, Jackson Ford with any questions you may have at Jackson.Ford@sonoma-county.org.

Thank you,

Amy Loukonen

Senior Office Assistant

www.PermitsSonoma.org

County of Sonoma

Planning Division | Natural Resources

2550 Ventura Avenue, Santa Rosa, CA 95403

Direct: 707-565-6186 | Office: 707-565-1900

Fax: 707-565-1103

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[<image005.jpg>](#)

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Letter G

From: [Steve Loving](#)
To: [Jackson Ford](#)
Cc: lovingsteve54@gmail.com
Subject: Monte Rio Bridge and Mouth of Dutch Bill
Date: Monday, April 04, 2022 4:50:14 PM

EXTERNAL

Jackson

G-1 What is the impact of the bridge design on the mouth of Dutch Bill Creek?

thanks
steve

Steve Loving
PO box 155
Monte Rio 95462

415 860 4679
sloving@well.com
lovingsteve54@gmail.com

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