



Protecting Marin Since 1934

November 27, 2018

U.S. Army Corps of Engineers San Francisco Division
1455 Market Street
San Francisco, CA 94103-1398
Attn: Cynthia Jo Fowler
Via Email: Corte.Madera@usace.army.mil

**Re: Joint Draft Environmental Impact Statement/Environmental Impact Report
Corte Madera Creek Flood Risk Management Project, Marin County, California**

Dear Ms. Fowler:

Marin Conservation League (MCL) supports this project to lessen the continuing periodic flooding in the Ross Valley. The DEIS/EIR provides sufficient description of the project, alternatives, impacts, and recommended mitigations for present purposes. We understand that more detailed plans are contingent on the Tentatively Selected Plan meeting federal standards to support a positive Record of Decision.

MCL offers only minor requests for further information in the EIS:

- Define interior drainage and project flooding, distinguishing any differences, and clarify the differing jurisdictional responsibilities.
- Describe flood district easements in the project area, and/or right-of-ways on private properties, and their uses and constraints. These are issues about which the general public often has little knowledge.
- Provide an estimation of the number and types of trees, on both public and adjacent private property, that would be removed and/or damaged during construction of the Sir Francis Drake Blvd bypass. Tree removal, whether directly due to construction or as a later consequence of root damage, would constitute a habitat loss and impair the visual character of this corridor. Are there any further measures, such as installation of young trees following construction, which could be introduced to help compensate for the loss of mature trees?
- Water temperature, particularly in view of the increasing unpredictability of weather conditions, remains a challenge for aquatic species dependent on cooler water. Any addition of canopy along the concrete channel, could help stabilize water temperature in that reach.
- We are aware of concerns about the functionality of resting pools in the upper 1,900 feet of the channel, and also support further study to determine if improvements could be made. Ross Valley streams that once teemed with Coho and steelhead have been re-

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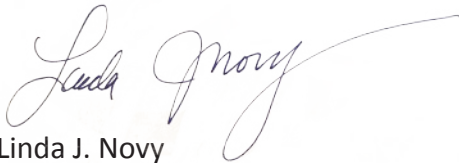
duced to only occasional sightings of Steelhead, along with infrequent Chinook. While we cannot bring back historic conditions, we look forward to this project improving waterways sufficiently to ease passage to the upper creek and boost current populations.

- Project noise and traffic impacts are unavoidable. We believe that early, frequent, and broad public notification, through all relevant media, regarding the anticipated timing of these impacts would help alleviate public inconvenience.

Along with improving public safety and greatly reducing damage to homes and businesses during storm events, completion of the USACE program would improve conditions for steelhead trout and salmon, and numerous other species. Removal of the Denil fish ladder would eliminate a formidable obstacle for steelhead trying to reach upstream spawning gravels and rearing habitat, and the improved habitat resulting from the removal of concrete walls and restoration at Allen Park will benefit fish and other aquatic wildlife.

Although there are actions that could further reduce flood potential and improve the environment, these benefits would exceed project costs and make federal approval unlikely, so are deferred at this time. We look forward to the College Avenue Bridge culverts and other improvements being considered in the future, and encourage expedient completion of the current environmental review process. MCL looks forward to the Record of Decision approving the FEIS and authorizing the Corps to proceed with design and construction as funding is available.

Sincerely,

A handwritten signature in cursive script, reading "Linda J. Novy". The signature is written in black ink and is positioned to the left of the typed name and title.

Linda J. Novy
President