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September 7, 2018

Marin County Board of Supervisors
Marin County Flood Control and Water Conservation District
3501 Civic Center Drive
San Rafael, CA 94903
Email: bos@marincounty.org

Members of the Board:

Re: San Anselmo Flood Risk Reduction Project
Final Environmental Impact Report (FEIR)

Marin Conservation League supports certification of the FEIR for the San Anselmo Flood Risk Reduction Project, along with approval and timely implementation of the mitigation measures that are described in the FEIR.

The EIR more than sufficiently describes the Project, its impacts, and recommended mitigations. We understand that this project is a component of the broader Ross Valley Flood Control and Watershed Program, and that additional segments of the umbrella project are being developed and will undergo environmental review at a later time.

The Ross Valley has had a long wait for flood control, starting with the 1944 Congressional approval of a survey report for "flood control and Allied purposes" on Corte Madera Creek. This resulted in the Army Corps of Engineers' being assigned the job of designing and constructing the Corte Madera Creek flood control project in cooperation with the Marin County Flood Control and Water Conservation District.

In 1966 County Supervisors approved the Corp's plan, a phased program with a six-mile concrete channel extending to Fairfax but work was stopped at the Ross town limits. Complications included changes in the cost share formula significantly shifting costs to the local community, public opposition, a lawsuit, and an analysis revealing flaws in the original project design. Numerous alternative designs have been debated for years, but periodic flooding continued.

The local funding measure approved in the wake of the 2005 flood finally enabled the hydraulic modeling, planning, and outreach on which a comprehensive flood reduction and watershed improvement program has been built.

The county is fortunate at this time to have state grant funds available for the San Anselmo project. These state funds will be withdrawn, however, if the project cannot be completed by the end of 2020, so

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decision-makers' immediate attention is needed to retain this support.

Use of the former Sunnyside growing grounds for floodwater storage would enable temporary detention of peak flows during storm events when rapid runoff causes flooding. Removal of the San Anselmo Avenue structure, along with the structure's concrete foundation in the creek, would increase the creek's flow capacity at a critical location. Both of these strategies – upstream detention and removal of a blockage in the creek downstream to increase channel capacity – are widely used methods to avert flooding. A smaller but comparable floodwater detention basin in Corte Madera is a popular community feature and valued recreational asset.

We urge you to certify this FEIR and approve the project as recommended by staff, including adoption of a Statement of Overriding Considerations as needed.

Comments/Recommendations

- Of impacts itemized in the EIR, traffic (4.15-1 to 4) may be foremost with the public. The
 TMP should ensure that personnel (perhaps the compliance manager) is able to be aware
 of public concerns as they arise. The Sir Francis Drake Rehabilitation construction could
 overlap this project, and it is uncertain how this will affect circulation as drivers in the Ross
 Valley seek new routes to avoid traffic tie-ups.
- Stormwater requirements, including for trash capture, along with recycling bins to encourage proper disposal of waste matter should be incorporated wherever feasible.
- The District should be alert to the ongoing possibility that monitoring and maintenance for sediment, bank erosion, and invasive vegetation may need to be accelerated. Given emerging storm uncertainties, and the growing threat of invasive species, the District should be prepared for emergency inspections and remediation.

Marin Conservation League appreciates the opportunity to comment on this important project and we look forward to subsequent projects to improve flood control in the Ross Valley.

Yours truly,

Linda Novy President