
Lahontan Regional Water Quality Control Board

TO: Water Board Members



FROM: Patty Z. Kouyoumdjian
Executive Officer

LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD

DATE: April 14, 2016

SUBJECT: **Exemption to 100-Year Floodplain Waste Discharge Prohibition
within the Truckee River Hydrologic Unit for the CA FLAP SR 89(1)
Truckee River Bridge Project, Placer County**

In ten days, I intend to sign the enclosed draft Order granting an exemption to the above-cited discharge prohibition specified in the Water Quality Control Plan for the Lahontan Region (Basin Plan). The exemption will allow the project proponent to replace Fanny Bridge and construct a new bridge across the Truckee River, and install three roundabouts on Highways 89 and/or 28. The project qualifies for an exemption under the categories of: 1) "Projects and activities essential for transportation, including stream crossings, 100-year floodplain crossings and associated facilities such as bridge abutments and approaches, installation and maintenance of storm drains and storm water treatment facilities, and road and highway maintenance activities; and 2) Projects and activities necessary to protect public health and safety or provide essential services".

The project meets requirements for an exemption to the discharge prohibition. A public notice soliciting comments on the proposed project will be posted on the Water Board's website for 10 days.

Please contact me at (530) 542-5412 (patty.kouyoumdjian@waterboards.ca.gov) or Elizabeth van Diepen, Scientific Aide, at (530) 542-5492 (elizabeth.vandiepen@waterboards.ca.gov), if you have any questions or comments regarding this matter.

Enclosure: Draft Water Quality Certification Order

cc: See next page

cc (via email): Sarah Baker, CH2M
Jason Brush, Wetlands Regulatory Office (WTR-8), US EPA, Region 9
Bill Orme, State Water Resources Control Board, Division of Water Quality
Kristine Hansen, U.S. Army Corps of Engineers, Reno Regulatory Field Office
Tanya Sheya, California Department of Fish and Wildlife
Shannon Friedman, Tahoe Regional Planning Agency
Darrell Naruto, Caltrans District 3
Russ Nygaard, Tahoe Transportation District
Peter Kraatz, Placer County

LVD/ma/T: R6T-2016-XXXX_CAFLAP SR 89 TR Bridge Project 100-Year FP Board Notice
File Under: WDID 6A311603001

Lahontan Regional Water Quality Control Board

Matt Ambroziak
Federal Highway Administration
Central Federal Lands Highway Division
12300 West Dakota Avenue
Lakewood, CO 80228
matthew.ambroziak@dot.gov

WDID 6A311603001

Board Order No. R6T-2016-XXXX, Clean Water Act Section 401 Water Quality Certification for CAFLAP SR 89(1) Truckee River Bridge Project, Placer County

The California Regional Water Quality Control Board, Lahontan Region (Water Board) has received a complete Clean Water Act (CWA) section 401 Water Quality Certification (Certification) application and application filing fee from the Federal Highway Administration – Central Federal Lands Highway Division (Applicant) for the CA FLAP SR 89(1) Truckee River Bridge Project (Project) in Placer County. An initial application was received on March 4, 2016, and additional information was provided to complete the application on **March 25, 2016**. This Certification hereby assigns this Project the following reference number: Waste Discharge Identification (WDID) No. 6A311603001. Please use this reference number in all future correspondence regarding this Project.

Any person aggrieved by this action of the Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations (CCR), title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Certification, except that if the thirtieth day following the date of this Certification falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

PROJECT DESCRIPTION

Table of Project Information:

WDID Number	6A311603001
Applicant	Matt Ambroziak/FHWA – CFLHD 12300 West Dakota Avenue Lakewood, CO 80228

Table of Project Information (continued):

Agent	Sarah E. Baker/CH2M 1000 Wilshire Blvd., Suite 2100 Los Angeles, CA 90017									
Project Name	CA FLAP SR 89(1) Truckee River Bridge Project									
Project Purpose and Description	State Route (SR) 89 would be realigned as a new two-lane segment of roadway that would cross through a 64-acre parcel owned by the U.S. Forest Service. The purpose of the Project is to relieve traffic congestion and replace a failing bridge at the existing intersection of SR 89/28. The western end would be reconstructed as a new single-lane roundabout, which would serve as the new SR 89/SR 28 intersection. A new bridge over the Truckee River would be constructed immediately to the southeast of the roundabout on the realigned highway segment. The new alignment would continue east and reconnect to existing SR 89 at a second roundabout near the existing changeable message sign and sled hill. The realigned portion of SR 89 would be elevated on an earthen embankment. Slopes of the embankment would be designed and revegetated to blend it into the surrounding forest. Fanny Bridge would be replaced to address its long-term structural integrity. The existing section of SR 89 between Fanny Bridge and the eastern roundabout would be relinquished by the state to Placer County and become a local street.									
Project Type	Fill/excavation									
Project County	Placer									
Project Address or other Locating Information	Fanny Bridge Tahoe City, CA 96145									
Location Latitude/Longitude	Latitude: 39.167621, Longitude: -120.145079 Latitude: 39.164261, Longitude: -120.148898 Latitude: 39.162963, Longitude: -120.144435									
Hydrologic Unit(s)	Hydrologic Area 635.20									
Overall Project Area	23.7 acres									
Receiving Water(s) Name	Truckee River									
Water Body Type(s)	Wetlands, Stream Channel, Riparian Zone									
Designated Beneficial Uses	MUN, AGR, IND, GWR, FRSH, POW, REC-1, REC-2, COMM, COLD, WILD, RARE, MIGR, SPWN									
Potential Water Quality Impacts	Sediment and other construction-related pollutants									
Area of Water(s) Within the Overall Project Area	3.52 acres									
Impacts of Fill and Excavation to Waters of the State, including Waters of the U.S. (WOUS)	Water-body Type	Temporary			Permanent					
					Physical Loss of Area			Degradation of Ecological Condition		
	Acres	Linear Feet	Cubic Yards	Acres	Linear Feet	Cubic Yards	Acres	Linear Feet	Cubic Yards	
	<i>Riparian Zone</i>	0.15			0.24					
	<i>Stream Channel</i>	0.49	127		0.053	83	638			
<i>Wetland</i>	0.04			0.18						

Table of Project Information (continued):

Federal Permit(s)	The Applicant has applied for U.S. Army Corps of Engineers (USACE) authorization to proceed under a Nationwide Permit 14, pursuant to CWA section 404.
Non-Compensatory Mitigation	<p>Bridge abutments for the new single-span Truckee River Bridge are to be placed outside of the ordinary high water mark (OHWM) of the river. New bridge abutments for the Fanny Bridge will be placed in the same location as the existing abutments. The existing piers in the channel will be removed to construct the new Fanny Bridge as a single-span structure. Work on the Fanny Bridge abutments will occur during summer months when flows are lower and diversion pipes will be installed on the Tahoe Dam gates to divert water around the work area. Water pumped from excavation activities and pile interiors will be disposed of off site at approved discharge locations.</p> <p>The Project will use sediment, erosion, and other standard site management BMPs to prevent sediment and other construction-related pollutants from entering surface waters. Implementation of a Hazardous Materials Spill Response Plan will be prepared by the selected contractor and included in the Stormwater Pollution Prevention Plan (SWPPP). Temporarily disturbed areas would be re-graded to preexisting conditions, stabilized, and revegetated in accordance with TRPA codes and environmental permitting requirements.</p>
Compensatory Mitigation	<p>The Project will impact a range of wetland types that vary in their functional values. In-lieu fees will be paid to the National Fish and Wildlife Federation (NFWF) for permanent impacts at the following ratios:</p> <p style="padding-left: 40px;">2.5:1 - Wetlands below the Truckee River OHWM, riparian wetlands, and palustrine emergent wetlands; and 1.5:1 – Palustrine scrub-scrub wetlands.</p> <p>The total in-lieu fee mitigation acreage for permanent impacts is 1.0075. The applicant must provide the Water Board with proof of payment to NFWF by <u>August 1, 2017</u>.</p> <p>Temporary impacts to riverine emergent wetlands will be mitigated onsite at a 1:1 ratio through re-establishment of native vegetation. Temporary (0.01 acre) and permanent (0.003 acre) impacts to ephemeral drainages will be mitigated onsite at a ratio of 1:1 by removal of non-native exotic vegetation and replacement with native species.</p>

Mitigation for Permanent Physical Loss of Area (CIWQS mitigation/restoration table side A)						
Aquatic Resource Type	Unit	Establishment	Re-establishment	Rehabilitation	Enhancement	Preservation
Wetland	Acres	0.2825				
Riparian Zone	Acres	0.6				
	Linear Feet					
Stream Channel	Acres	0.125		0.003		
	Linear Feet			50		
Mitigation for Temporary Impacts (CIWQS mitigation/restoration table side B)						
Aquatic Resource Type	Unit	Establishment	Re-establishment	Rehabilitation	Enhancement	Preservation
Wetland	Acres		0.04			
Riparian Zone	Acres		0.15	0.6		
	Linear Feet			300		
Stream Channel	Acres			0.49		
	Linear Feet			300		
Applicable Fees	\$0 - Federal Agency exemption					
Fees Received	\$0					

CEQA COMPLIANCE

A joint Environmental Impact Report/Environmental Impact Statement/Environmental Assessment (EIR/EIS/EA) was prepared for the Project on behalf of the Tahoe Regional Planning Agency (TRPA) pursuant to Article VII of the Tahoe Regional Planning Compact and Chapter 5 of the TRPA Code of Ordinances, the Tahoe Transportation District (TTD) pursuant to the California Environmental Quality Act (CEQA, Public Resources Code sections 21000, et seq.), and the Federal Highway Administration (FHWA) pursuant to the National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ) (40CFR sections 1500 et seq.). The TTD, acting on behalf of the participating parties filed a Notice of Determination for the Project with the State Clearinghouse (State Clearing House Number 2011122013) on May 19, 2015, pursuant to CEQA.

The Water Board, acting as a CEQA Responsible Agency in compliance with CCR, title 14, section 15096 (g)(2), evaluated the significant and potentially significant impacts to water quality identified in the Final EIR for the CA FLAP SR 89(1) Truckee River Bridge Project. Water Board staff finds the mitigation measures in the Final EIR to be adequate to reduce significant or potentially significant water quality impacts to less than significant levels.

WATER QUALITY CONTROL PLAN WASTE DISCHARGE PROHIBITION

The Water Board has adopted a *Water Quality Control Plan for the Lahontan Region* (Basin Plan) which, in Chapter 4.1, specifies the following discharge prohibition:

2. The discharge or threatened discharge, attributable to human activities, of waste to lands within the 100-year floodplain of the Truckee River, Little Truckee River, and their tributaries is prohibited.

The Project involves the discharge attributable to human activities of waste to lands within the 100-year floodplain of the Truckee River Hydrologic Unit.

EXEMPTION CRITERIA AND FINDINGS

As set in the Basin Plan, the Water Board may grant exemptions to Prohibition 2, above, for the following categories of new projects within the 100-year floodplain:

- (2) *Projects and activities essential for transportation, including stream crossings, 100-year floodplain crossings and associated facilities such as bridge abutments and approaches, installation and maintenance of storm drains and storm water treatment facilities, and road and highway maintenance activities.*
- (3) *Projects and activities necessary to protect public health and safety or provide essential services.*

An exemption to Prohibition 2 may be allowed for a specific new project only when the Water Board makes all of the following findings:

- i. *The project is included in one or more of the categories listed above.*

The primary purpose of the Project is to improve traffic circulation through a heavily congested intersection of two state highways that is currently limited by a single river crossing, to replace the existing bridge (Fanny Bridge) crossing the Truckee River that no longer meets seismic safety standards, and to improve the safety for pedestrians and bicyclist crossing the river. It will be necessary to construct bridge abutments and approaches, to replace existing bridge abutments, and construct a small section of realigned bike path within limited portions of the Truckee River 100-year floodplain in order to provide essential transportation facilities for and to improve public safety through the busy SR 89/28 transportation corridor. Therefore, the Project and its numerous elements are included in the two categories, above.

- ii. *There is no reasonable alternative that avoids or reduces the extent of encroachment by the project within the 100-year floodplain.*

The new bridge has been designed as a single-span bridge to minimize its impacts to and encroachment within the Truckee River 100-year floodplain. Additionally, Fanny Bridge is being reconstructed as a single-span bridge to reduce its permanent encroachment within the 100-year floodplain compared to current conditions. The

- 6 -

Project's design elements and construction activities have been developed to minimize both temporary and permanent encroachment within the 100-year floodplain. There is no reasonable alternative that further reduces the extent of encroachment within the 100-year floodplain.

- iv. *All applicable and practicable control and mitigation measures have been incorporated such that potential adverse impacts to water quality are the minimum necessary to complete the project and beneficial uses are protected.*

The Project incorporates both temporary and permanent BMPs and other measures intended to minimize the potential adverse impacts to water quality and beneficial uses that are associated with construction work within and around surface waters. Temporary measures will include clear-water diversions to isolate river flows from construction activities, construction fencing to identify and limit the Project area, and perimeter controls intended to prevent construction materials and wastes from migrating into surface waters. The Project will also incorporate permanent storm water treatment facilities where none currently exist, and all disturbed soil will be revegetated or otherwise re-stabilized. These and other Project elements and construction measures constitute applicable practicable control and mitigation measures that will avoid adverse impacts to water quality, protect beneficial uses, and allow the Project to be completed.

- v. *The project will not reduce or adversely affect the existing floodplain function. This shall be ensured by restoration of previously disturbed areas within the 100-year floodplain within the project site, or by improvement of floodplain function within or as close as practical to the project site. The restored or improved 100-year floodplain function must more than offset the floodplain function lost by construction of the project. This finding will not be required for: (1) essential public health or safety projects, (2) projects to provide essential public services that the Regional Board finds such mitigation measures to be infeasible because the financial resources of the entity proposing the project are severely limited, or (3) monitoring or scientific research projects where the Board finds the floodplain function will not be significantly reduced.*

A total of 0.15 acres of floodplain would be permanently affected by the Project, including 0.12 acres by roadway and bridge features and 0.03 acres by the bike trail. Hydraulic modeling by the Applicant shows a no-rise condition in the floodway or 100-year floodplain associated with Project implementation. No effects on the base flood elevations are anticipated. Mitigation for floodplain impacts will include the approximately one 1 acre of mitigation described, above, for wetlands, which are located within the 100-year floodplain, as well as re-contouring and planting riparian vegetation on 0.06 acres of the degraded riverbank adjacent to the Caltrans Tahoe City Maintenance Station to increase and enhance floodplain function. Additionally approximately 0.003 acres of ephemeral drainage will be rehabilitated by removing invasive vegetative species and revegetating with native species. The Project will not reduce or adversely affect existing floodplain functions with these mitigation measures.

EXEMPTION GRANTED

Resolution No. R6T-2015-0038 delegates to the Executive Officer the authority to grant exemptions to Basin Plan waste discharge prohibitions. As demonstrated above, the Project meets the conditions and criteria for an exemption to the waste discharge prohibitions. The Project meets the conditions in the Basin Plan for granting an exemption. A notice of exemption was posted on the Water Board website and distributed through an interested-persons mailing list, allowing at least 10 days for comments to be submitted. The Project is hereby granted an exemption to the above-cited waste discharge prohibition.

SECTION 401 WATER QUALITY CERTIFICATION

Authority

Section 401 of the CWA (33 U.S.C., paragraph 1341) requires that any applicant for a CWA section 404 permit, who plans to conduct any activity that may result in discharge of dredged or fill materials to waters of the U.S., must provide to the permitting agency a certification that the discharge will be in compliance with applicable water quality standards of the state in which the discharge will originate. No section 404 permit may be granted (or valid) until such certification is obtained. The Applicant submitted a complete application and the fees required for certification under section 401 for the Project. The Applicant has applied for USACE authorization to proceed under Nationwide Permit No. 14 pursuant to CWA section 404.

CCR, title 23, section 3831(e) grants the Water Board Executive Officer the authority to grant or deny Certification for projects in accordance with CWA section 401. The Project qualifies for such Certification.

Standard Conditions

Pursuant to CCR, title 23, section 3860, the following standard conditions are requirements of this Certification:

1. This Certification action is subject to modification or revocation upon administrative or judicial review, including review and amendment pursuant to Water Code section 13330 and CCR, title 23, section 3867.
2. This Certification action is not intended and must not be construed to apply to any discharge from any activity involving a hydroelectric facility requiring a Federal Energy Regulatory Commission (FERC) license unless the pertinent certification application was filed pursuant to CCR title 23, section 3855(b) and the application specifically identified that a FERC license or amendment to a FERC license for a hydroelectric facility was being sought.

- 8 -

3. The validity of any non-denial certification action must be conditioned upon total payment of the full fee required under CCR title 23, section 3833, unless otherwise stated in writing by the certifying agency.
4. Neither Project construction activities nor operation of the Project may cause a violation of the Basin Plan, may cause a condition or threatened condition of pollution or nuisance, or cause any other violation of the Water Code.
5. The Project must be constructed and operated in accordance with the Project described in the Certification application that was submitted to the Water Board. Deviation from the Project description constitutes a violation of the conditions upon which this Certification was granted. Any significant changes to this Project that would have a significant or material effect on the findings, conclusions, or conditions of this Certification, including Project operation, must be submitted to the Executive Officer for prior review and written approval.
6. This Certification is subject to the acquisition of all local, regional, state, and federal permits and approvals as required by law. Failure to meet any conditions contained herein or any conditions contained in any other permit or approval issued by the state of California or any subdivision thereof may result in the revocation of this Certification and civil or criminal liability.
7. The Water Board may add to or modify the conditions of this Certification as appropriate to implement any new or revised water quality standards and implementation plans adopted or approved pursuant to the Porter-Cologne Water Quality Control Act or section 303 of the CWA, or as appropriate to coordinate the operations of this Project with other projects where coordination of operations is reasonably necessary to achieve water quality standards or protect the beneficial uses of water. Notwithstanding any more specific conditions in this Certification, the Project must be constructed and operated in a manner consistent with all water quality standards and implementation plans adopted or approved pursuant to the Porter-Cologne Water Quality Control Act or section 303 of the CWA.
8. This Certification does not authorize any act which results in the taking of a threatened or endangered species or any act which is now prohibited, or becomes prohibited in the future, under the California Endangered Species Act (Fish and Game Code sections 2050, et seq.) or the federal Endangered Species Act (16 U.S.C. sections 1531, et seq.). If a "take" will result from any act authorized under this Certification, the Applicant must obtain authorization for the take prior to construction or operation of the Project. The Applicant is responsible for meeting all applicable requirements of the Endangered Species Act for the Project authorized under this Certification.

Additional Conditions

- 9 -

Pursuant to CCR title 23, section 3859(a), the following additional conditions are requirements of this Certification:

1. The Applicant must provide information to the Water Board verifying the purchase of mitigation credits from the USACE Sacramento District In-Lieu Fee Program within the Truckee River Watershed (Hydrologic Area 635.20). Mitigation credits must be purchased by **August 1, 2017**, for a total of 1.0075 acres.
2. A detailed dewatering plan must be submitted to the Water Board prior to beginning work in jurisdictional surface waters. The plan must describe the methods to be used to isolate work areas from surface waters, dewater excavation areas, and dispose of dewatering waste. The plan must include diagrams for water diversions and maps of the waste disposal areas.
3. Restoration of temporary disturbances and temporary discharges of fill to waters of the state must be achieved within 12 months of completing work in the area of the temporary impact. Initial restoration must include implementing measures to fully restore conditions to support all beneficial uses for the waterbody temporarily impacted in the shortest feasible time. Restoration must include, but is not limited to, grading to pre-Project contours and revegetation with native species. The Applicant must implement BMPs to control erosion and runoff from areas associated with temporary fills.
4. A final mitigation report, acceptable to the Executive Officer, must be provided at the end of three years on **November 15, 2020**, indicating whether performance standards have been met and the status of compliance with restoration requirements. Additional requirements may be instated at that time if success standards have not been met to the satisfaction of the Executive Officer.
5. Monitoring and technical reports as described herein are required pursuant to Water Code section 13267, and are necessary to verify compliance with the conditions of this Certification.
6. Construction equipment must be clean and free from oil, grease, and loose metal material and must be removed from service if necessary to protect water quality.
7. Debris, cement, concrete (or wash water therefrom), oil or other petroleum products must not be allowed to enter into or be placed where they may be washed from the Project site by rainfall or runoff into waters of the state. When operations are completed, any excess material must be removed from the Project work area and any areas adjacent to the work area where such material may be transported into waters of the state.
8. The Applicant must immediately notify Water Board staff by telephone whenever an adverse condition occurs as a result of this discharge. Such a condition includes, but is not limited to, a violation of the conditions of this Certification, a significant spill of petroleum products or toxic chemicals, or damage to control

- 10 -

facilities that would cause noncompliance. Pursuant to Water Code section 13267(b), a written notification of the adverse condition must be provided to the Water Board within two weeks of occurrence. The written notification must identify the adverse condition, describe the actions necessary to remedy the condition, and specify a timetable, subject to any modifications by Water Board staff, for the remedial actions.

9. An emergency spill kit must be at the Project site at all times.
10. The Applicant must permit Water Board staff or its authorized representative upon presentation of credentials:
 - a. Entry onto Project premises, including all areas on which surface water fill or mitigation is located or in which records are kept.
 - b. Access to copy any record required to be kept under the terms and conditions of this Certification.
 - c. Inspection of any treatment equipment, monitoring equipment, or monitoring method required by this Certification.
11. The Applicant must ensure that the contractor employs necessary measures to prevent the introduction or spread of noxious/invasive weeds within the Project and staging areas. These measures may include the treatment of onsite infestations, the cleaning of all equipment and gear that has been in an infested site, the use of weed-free erosion control materials (including straw), and the use of weed-free seeds and plant material for revegetation of disturbed areas.

Enforcement

1. In the event of any violation or threatened violation of the conditions of this Certification, the violation or threatened violation must be subject to any remedies, penalties, process or sanctions as provided for under state law. For purposes of CWA section 401(d), the applicability of any state law authorizing remedies, penalties, process or sanctions for the violation or threatened violation constitutes a limitation necessary to assure compliance with the water quality standards and other pertinent requirements incorporated into this Certification.
2. In response to a suspected violation of any condition of this Certification, the State Water Board or the Water Board may require the holder of any permit or license subject to this Certification to furnish, under penalty of perjury, any technical or monitoring report the State Water Board or Water Board deems appropriate, provided that the burden, including costs, of the reports must be a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.
3. In response to any violation of the conditions of this Certification, the Water Board may add to or modify the conditions of this Certification as appropriate to ensure compliance.

- 11 -

Section 401 Water Quality Certification Requirements Granted

I hereby issue this Order certifying that any discharge from the referenced Project will comply with the applicable provisions of CWA sections 301 (Effluent Limitations), 302 (Water Quality Related Effluent Limitations), 303 (Water Quality Standards and Implementation Plans), 306 (National Standards of Performance), and 307 (Toxic and Pretreatment Effluent Standards), and with other applicable requirements of state law. This discharge is also regulated under State Water Board Order No. 2003-0017-DWQ, "General Waste Discharge Requirements for Dredge and Fill Discharges That Have Received State Water Quality Certification" which requires compliance with all conditions of this Certification.

Except insofar as may be modified by any preceding conditions, all certification actions are contingent on (a) the discharge being limited and all proposed mitigation being completed in strict compliance with the Applicant's Project description and the terms specified in this Certification, and (b) compliance with all applicable requirements of the Basin Plan.

Water Board staff looks forward to working with you in your efforts to protect water quality. Please contact me at (530) 542-5412 (patty.kouyoumdjian@waterboards.ca.gov), Alan Miller, Senior Water Resources Control Engineer, at (530) 542-5430 (alan.miller@waterboards.ca.gov), or Liz van Diepen, Scientific Aide, at (530) 542-5492 (elizabeth.vandiepen@waterboards.ca.gov) if you have any questions or comments regarding this permit. **Electronic document submittal is required. Please send your comments or documents to the Water Board's email address at Lahontan@waterboards.ca.gov and include your WDID No. and Project/Facility Name in the Subject Line.**

PATTY Z. KOUYOUMDJIAN
EXECUTIVE OFFICER

cc (via email): Sarah Baker, CH2M
Jason Brush, Wetlands Regulatory Office (WTR-8), US EPA, Region 9
Bill Orme, State Water Resources Control Board, Division of Water Quality
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