



San Antonio Dam Spillway Replacement and Nacimiento Plunge Pool Projects: Environmental Consulting Services

No. 2026-001

Monterey County Water Resources Agency

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Submitted by:

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San Antonio Project

2. Satisfying Requirements of the Scope of Work

This section discusses in detail the GEI Team's approach to satisfying the requirements of the scope of work provided in the RFQ for the San Antonio Project. This section does not repeat scope or deliverables listed in the RFQ; those items will be completed as stated in the RFQ. GEI has not added approach text for Tasks 6, 8, 9, and 11. Additional deliverables identified by GEI for the San Antonio Project are listed below.

List of Additional Deliverables identified by GEI for the San Antonio Project

- **Task 4.1:** Public Scoping Comments Table Summary, CEQA Strategy Meeting Notes
- **Task 4.2:** Draft and Final Cultural Resources Technical Memorandum, AB52 Notification Guidance (including notification letters)
- **Task 4.3:** Draft and Final Habitat Maps
- **Task 4.4:** Draft and Final Jurisdictional Delineation
- **Task 13:** Mailing List, Contact Management System, Four Project Update Narratives, Mailing up to 30 Copies Each of the NOP and NOA

Task 1 Project Management and Team Coordination

GEI's project manager and CEQA/NEPA lead, permitting lead, and EIR manager will attend a kick-off meeting with MCWRA staff to address the project work plan and schedule and to establish processes, including communication preferences by MCWRA staff and a uniform project file system. Ryan Jolley and two additional key staff are also prepared to attend twice-monthly, hour-long virtual status meetings with MCWRA and Program Manager throughout the duration of the technical studies and CEQA phase. If permitting support is required after the CEQA phase, additional monthly meetings will be held.

Ryan Jolley will maintain the project budget and schedule developed for this proposal, including all tasks and deliverables, key milestones, and decision points. He will manage the project, administer the contract, oversee task authorizations, coordinate with the MCWRA team to complete this scope of work, review all draft and final deliverables, and prepare monthly progress reports and invoices. GEI will set up a project-specific MS Teams channel or SharePoint site and provide MCWRA staff access for data collection, file sharing, and document reviews. GEI will develop a preliminary cost estimate for environmental mitigation measures and update the cost estimate as mitigation is developed, the Mitigation Monitoring and Reporting Program (MMRP) is completed, and any necessary permits are obtained.

Task 2 Project Description

The project description will be based on the 60% design, anticipated to be completed in mid-2026, and other information developed by MCWRA's design team. The project description will describe the project location, project objectives, existing facilities, facilities to be removed, proposed spillway components, and other components and their characteristics, construction (sequence, work zones, access, equipment and storage areas, haul routes, number of workers, number of days and times, and methods), any new or different maintenance activities, and anticipated permits and approvals. GEI will work with MCWRA and the design team to identify and describe the logistical aspects of project construction. The project description will contain figures of the regional project components, spillway components and other components, and construction areas, and will include design schematics, cross sections, and other illustrations as needed to clearly convey information.

Task 3 Initial Study and Notice of Preparation

In accordance with the State CEQA Guidelines Section 15082, GEI will prepare an NOP, including a summary project description, project location map, and a list of the potential environmental effects that will be evaluated in the Draft EIR—provided by the Initial Study checklist. GEI will prepare the Initial Study in accordance with State CEQA Guidelines Appendix G Environmental Checklist (Appendix G) using the Spillway Alternatives Analysis, additional project information provided by MCWRA, and information on environmental conditions in publicly available databases, documents, and MCWRA’s Interlake Tunnel and Spillway Modification Project Draft EIR. Following an initial kickoff to introduce GEI’s technical specialists to the project details and existing reports and information, GEI’s project team will meet to verbally discuss analytical approaches to address the questions in the Appendix G checklist, focus the analysis, and begin identifying mitigation strategies for impacts anticipated to be significant. The Initial Study will provide substantial evidence to support conclusions for topics that will be focused out of the EIR based on the lack of potentially significant impacts. For topics analyzed in detail in the EIR, the Initial Study will identify the potential for significant impacts and describe the framework that will be used in the EIR analysis.

Task 4 EIR Preparation

Task 4.1 Finalize CEQA Strategy (New Subtask)

After the public scoping period has closed, GEI will prepare a table summarizing comments received on the NOP and identifying relevant EIR sections where the comment will be addressed. GEI’s project manager and EIR manager (see staffing section for description of roles) will attend a meeting with MCWRA staff to discuss the strategy for the EIR considering the conclusions of the Initial Study and any comments received on the NOP. This discussion will outline the analytical approach and anticipated mitigation measures for those topics identified for detailed EIR analysis based on the Initial Study. The meeting discussion will also include an initial outline of alternatives for consideration, based on the design work already done, and the potential for alternatives to meet the CEQA requirement of reducing one or more significant project impacts. We will also discuss the likely cumulative projects and scope of the cumulative analysis. The intent of this approach meeting is to confirm alignment of GEI’s CEQA strategy with MCWRA’s expectations and minimize the need for substantial changes between the Administrative Draft and Draft EIR based on MCWRA’s comments, as prioritized in the RFQ. The meeting conclusions and approach will be documented in a meeting summary, and GEI will begin preparation of the Administrative Draft EIR.

Task 4.2 Prepare Cultural Resources Technical Memorandum and Support AB 52 Consultation (New Subtask)

GEI will prepare a Cultural Resources Technical Memorandum to support the project throughout CEQA. The technical memorandum will present methods and findings of a California Historical Resources Information System (CHRIS) records search, a desktop geoarchaeological review, archival research, a pedestrian field survey covering up to 20 acres for the San Antonio Project, a search of the Sacred Lands File with the Native American Heritage Commission, outreach with historical societies, evaluation of resources for inclusion in the CRHR, and an impacts assessment. GEI’s cost estimate includes evaluating the following five historic era-built environment resources that will be evaluated for inclusion in the CRHR: San Antonio Dam, two road segments, a building, and a pad that have been identified within the preliminary 20-acre study area. GEI’s cost estimate assumes that there are no archaeological resources within the study area and the five built environment resources within the project area will be recommended not eligible for inclusion in the CRHR.

Additionally, GEI will assist MCWRA by providing an Assembly Bill (AB) 52 assistance package that includes AB 52 notification letters, a correspondence tracker, and applicable legislation to assist MCWRA implement AB 52. After receipt of notification letters, Native American contacts have 30 days to reply to a request for consultation under AB 52. GEI’s cost estimate assumes no tribal responses will be received to the notification

letters, no Tribal Cultural Resources will be identified, and the environmental document will result in no impact to tribal cultural resources.

Task 4.3 Conduct Biological Resources Survey (New Subtask)

GEI will review available information on sensitive biological resources that may be present in the vicinity of the project site, including information from the California Natural Diversity Database; the California Native Plant Society Inventory of Rare, Threatened, and Endangered Plants of California; the species list from the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation website; and other relevant sources. GEI will then conduct a reconnaissance-level survey and site evaluation covering up to 20 acres for the San Antonio Project, focusing on characterizing site conditions and onsite habitats, identifying any potential sensitive habitats, confirming habitat suitability for various special-status species, and evaluating adjacent land uses and habitats that could be impacted by the project. GEI's cost estimate does not include protocol-level surveys for special-status plant or wildlife species. A biological resources survey will be conducted by two GEI biologists in a 10-hour field day, excluding travel time. A separate biological technical report is not necessary for the San Antonio Project and biological information and analysis will be incorporated into the Draft EIR.

Task 5 Prepare Administrative Draft EIR

GEI will prepare an Administrative Draft EIR using a template approved by MCWRA and following the requirements of the State CEQA Guidelines for EIRs. The EIR contents and outline will follow the strategy and approach outlined in Task 4.1 based on discussion with MCWRA staff.

Environmental Analysis: GEI assumes that the following resource topics are not evaluated in the Draft EIR because they would not result in potentially significant impacts and are dismissed from further analysis in the IS: agriculture and forestry, energy, land use and planning, mineral resources, population and house, public services, recreation, transportation, and utilities and service systems. For the remaining resource topics carried through to the Draft EIR for further environmental analysis, GEI will provide a detailed description of the environmental and regulatory setting (focusing on information supporting the impact analysis), significance criteria, methods used to evaluate impacts, relevant comments from public scoping, and detailed impact analyses. If a significant impact could occur, feasible mitigation measures will be identified to reduce the impact to a less-than-significant level to the extent possible. Information from the Interlake Tunnel and Spillway Modification Project Draft EIR will be used to the extent possible.

Cumulative Impacts: GEI will identify projects for the cumulative impacts analysis based on the Interlake Tunnel and Spillway Modification Project Draft EIR, additional projects identified by MCWRA and the design team in Task 4.1, and review of other publicly available information. The cumulative impact analysis will discuss the incremental effects of the project within the context of cumulative impacts at a lesser level of detail than the effects of the project alone. Information from the Interlake Tunnel and Spillway Modification Project Draft EIR will be used to the extent possible for consistency.

Alternatives Analysis: The alternatives analysis in the EIR will discuss the alternatives development/screening process employed by MCWRA for the project, identify alternatives considered but dismissed, and evaluate a reasonable range of alternatives considered, including the No Project Alternative, in comparison to the proposed project. Working closely with MCWRA, including as described in Task 4.1, GEI will identify a reasonable range of alternatives with the potential to reduce or avoid one or more of the significant impacts of the project, as required by CEQA. We will identify alternatives using the Spillway Alternatives Analysis and will consider new alternatives if needed to consider a reasonable range required by CEQA—all alternatives considered in detail will meet most of the basic project objectives and reduce at least one significant impact of the project.

GEI's Approach to Specific Resource Topics with Potential for Significant Impacts

- **Air Quality** – The primary air quality issue will be criteria air pollutant emissions during construction activities. GEI will use a standard air quality model to estimate construction-related emissions of criteria air pollutant for comparison to Monterey Bay Unified Air Pollution Control District requirements and thresholds for construction emissions. We will qualitatively evaluate short-term exposure of any nearby sensitive receptors to air pollutants.
- **Biological Resources** – GEI will incorporate the findings from the biological resource background research and surveys conducted in Task 4.3 into the EIR section. The project may result in impacts to nesting birds. GEI will incorporate the findings from Task 4.3 to determine impacts to and potential mitigation for special-status species affected by the project.
- **Cultural Resources** – The primary cultural resources issue appears to be the built environment historic era cultural resources within the preliminary project area that have not yet been evaluated for inclusion in the CRHR. GEI will incorporate the findings from Task 4.2 to determine impacts to and potential mitigation for cultural resources.
- **Greenhouse Gas Emissions (GHG)** – GEI will develop an estimate of construction GHG emissions from the air quality model and will identify amortized emissions over the anticipated lifespan of the project. We anticipate that emissions can be mitigated with construction BMPs, offsite measures, and purchase of qualified credits, if needed.
- **Hydrology/Water Quality** – This analysis will focus on hydraulic changes from the project, primarily the potential for direct or indirect impacts during construction activities, such as changes in runoff and discharge of pollutants in stormwater.
- **Noise and Vibration** – The project location is in an area where existing noise levels are low, and there are few sensitive receptors nearby. GEI will conduct noise modeling, if necessary, to evaluate impacts from construction-related noise and vibrations to sensitive noise receptors within distances of applicable noise and vibration thresholds of significance.

Task 6 Prepare Draft EIR and NOA (see RFQ scope)

Task 7 Prepare Draft Responses to Comments

GEI will review, organize, and bracket comments received on the Draft EIR and identify comments requiring discussion with MCWRA. GEI will prepare responses to comments raising significant environmental issues, as required by CEQA. The level of detail in the response will be dependent on the nature and level of detail of the comment. General responses will be provided to general comments, and master responses may be developed for multiple comments with similar topics. Responses will include reference to substantial evidence needed to defend the EIR in court. GEI will attend a meeting with MCWRA to review and discuss written and verbal comments received on the EIR and proposed responses and edits to the Draft EIR text.

Task 8 Prepare Administrative Final EIR (see RFQ scope)

Task 9 Prepare Final EIR (see RFQ scope)

Task 10 Prepare Findings, Statements of Overriding Considerations, NOD, and MMRP

The Draft EIR analysis will identify and discuss resource benefits, as well as impacts required by CEQA, so that these benefits can be used in the Findings, and Statement of Overriding Considerations if required, for a more robust summary of not only project impacts but project benefits as well.

Task 11 Final EIR Certification/Public Outreach (see RFQ scope)

Task 12 Public Meetings

As required in the RFQ, GEI will notice, prepare materials for, and attend a public scoping meeting hosted by MCWRA during the public scoping period and a public review meeting for the Draft EIR. For each meeting, GEI will prepare a PowerPoint presentation highlighting the project, EIR preparation and conclusions, and the CEQA process for use during the meeting. Prior to each public meeting, GEI will review the presentations and meeting details in a meeting with MCWRA staff and will make updates based on input received. Following each public meeting, GEI will prepare a summary of the meeting proceedings.

Task 13 Public Outreach

GEI will assist MCWRA with public outreach, including developing a mailing list of interest groups and stakeholders, maintaining a contact management system to document interactions with agencies and the public, and provide up to four updates for posting on MCWRA website and distributing to interested parties via email. GEI will also mail notices, including the NOP and NOA, on behalf of MCWRA. We have included mailing cost for up to 30 hard copies of the NOP and NOA. Our cost estimate assumes MCWRA will publish the public notice in the newspaper(s) and have electronic access available to all CEQA-related documents.

Task 14 Permits and Other Approvals

The project would necessitate careful construction staging and sequencing since impacts to environmental resources are currently unknown and uncertain. Impacts to sensitive habitats and plant and wildlife species, such as bald and golden eagles (if present) and if nest removal or abandonment were to occur, would require permits and approvals from USFWS and CDFW. However, aquatic habitat supporting fisheries and aquatic species are not present within the spillway channel and, therefore, permits from NMFS are not expected. Based on interpretation of the 2023 Clean Water Rule, as amended, the area of the concrete spillway itself and the channel between the spillway and San Antonio River proper, would not likely be considered waters of the U.S. or state by USACE and Regional Water Quality Control Board (RWQCB), respectively. However, there is uncertainty as to whether the portion of the reservoir leading to the spillway crest would be considered as jurisdictional waters by these agencies. Therefore, GEI recommends preparation of an aquatic resources delineation (ARD) to obtain formal determination of the jurisdictional status of the spillway channel and reservoir leading to the spillway crest. If these areas are considered as jurisdictional waters and the proposed project activities would result in impacts to these waters, then additional permits under CWA Sections 404 and 401 would be required. If a Section 404 permit is required, then compliance with the National Historic Preservation Act (NHPA) Section 106 would also be needed. Finally, a permit from CDFW under California Fish and Game Code Section 1602 is not expected as the spillway channel is not anticipated to be defined by CDFW as a stream.

Task 14.1 Conduct Aquatic Resources Delineation (New Subtask)

GEI will review USFWS National Wetland Inventory maps, Natural Resources Conservation Service soil survey information, U.S. Geological Survey 7.5-minute series topographic maps, and aerial photographs of the project sites in preparation for an ARD. GEI will conduct the ARD in accordance with current USACE methodologies and prepare an ARD Report that follows USACE Minimum Standards for Acceptance of Aquatic Resources Delineation Reports. The ARD will be conducted within the reservoir area leading to the spillway, the spillway proper, and the spillway channel below the flip bucket to the confluence with the San Antonio River. The delineation will accurately depict the location and extent of waters of the U.S. potentially subject to USACE jurisdiction under CWA Section 404 and waters of the state under Section 401 of the CWA or Porter-Cologne Water Quality Control Act.

Task 14.2 Prepare Permitting Strategy (Renumbered from RFQ)

If it is determined that permits are needed for the project, then GEI will develop a comprehensive environmental and regulatory compliance strategy plan that addresses both federal and state laws and regulations, specifically the federal and California Endangered Species Acts (ESAs), CWA, and Section 1602 of the California Fish and Game Code. The strategy will identify the permit types to be sought and provide potential options for satisfying habitat mitigation and other requirements.

Task 15 Optional Task: Prepare and Process Permit Applications

If permits are required based on work performed in Task 14, then GEI will prepare permit applications and support MCWRA in permit negotiations and approvals following the strategy, scope, and budget developed in Task 14.

3. Project Schedule

GEI's proposed schedule for the San Antonio Project scope of work is presented in **Figure 2**.

4. Tasks Required by MCWRA Staff

MCWRA will need to facilitate meetings with the design team for GEI to collect project information needed to prepare the EIR project description and environmental analysis. To help determine jurisdictional areas, including limits of waters of the U.S. and state, GEI will need the reservoir maximum water surface elevation boundary and any existing ARDs. In addition, MCWRA should also provide information on currently known internal and external stakeholders and their issues, and previous coordination with regulatory agencies.

5. Innovative and/or Creative Approaches

GEI's proposal for the San Antonio Project includes the following additional approaches to maximize efficient, cost-effective operations, and/or increased performance capabilities.

- Field surveys for both the San Antonio and Nacimiento Projects would be conducted during the same staff mobilization to reduce travel time and expenses.
- Leveraging significant amounts of information in MCWRA's Interlake Tunnel and Spillway Modification Project Draft EIR to prepare the Draft EIR, including information from the environmental and regulatory settings, cumulative impacts analysis, and mitigation measures (to be adapted for the project as needed).
- Using staff that have relevant experience working on the same types of projects with similar issues, which means there's no learning curve; this includes working with the same regulatory agencies and staff on other MCWRA projects.

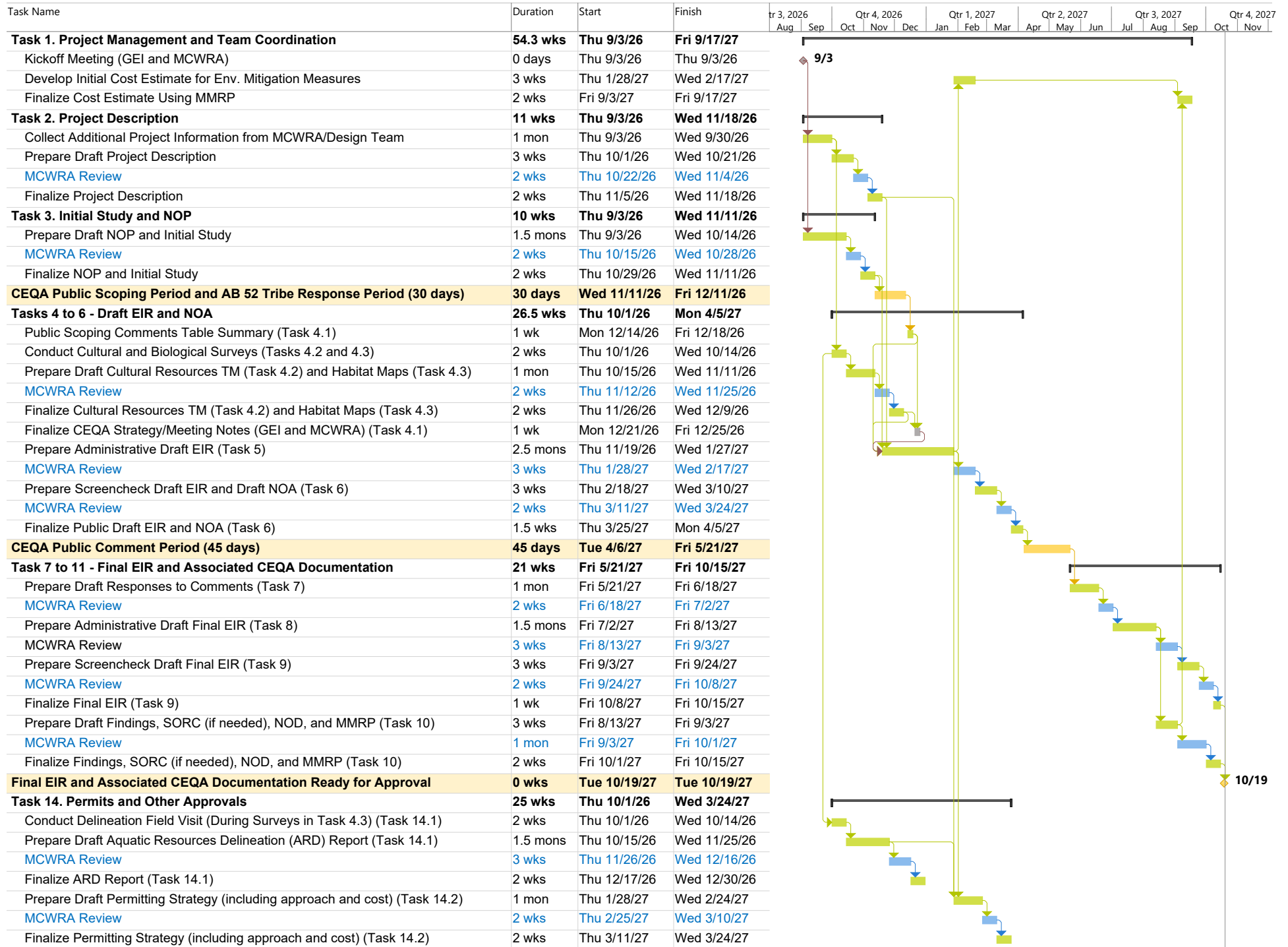
GEI's Approach to Permitting Strategy

- **Identify** permit triggers and methods and processes for obtaining required permits and authorizations.
- **Present** a detailed strategy identifying the constraints and benefits of selecting a permitting process.
- **Consider** the implications of the permitting and compensatory mitigation pathways on the objectives and schedule.
- **Summarize** general timeframes, costs, and other requirements.

Project Information Needed from MCWRA

- **Project design** – removal of existing spillway facilities, new spillway components, project footprint, and any new or different maintenance needs.
- **Construction plans** – limits of ground disturbance, access routes and any improvements, staging areas, construction schedule and sequence, construction equipment details, quantities of import and export materials, and number of workers and truck trips.
- **As built** – for existing built environment resources to conduct the cultural resources evaluation.

Figure 2. Proposed San Antonio Project Schedule



Nacimiento Project

2. Satisfying Requirements of the Scope of Work

This section discusses in detail the GEI Team's approach to satisfying the requirements of the scope of work provided in the RFQ for the Nacimiento Project. This section does not repeat scope or deliverables listed in the RFQ; those items will be completed as stated in the RFQ. Additional deliverables identified by GEI for the Nacimiento Project are listed below.

List of Additional Deliverables identified by GEI for the Nacimiento Project

- **Task 3.1:** CEQA Strategy Meeting Notes
- **Task 3.2:** Draft and Final Cultural Resources Technical Report, AB52 Notification Guidance (including notification letters)
- **Task 3.3:** Draft and Final Biological Resources Technical Report
- **Task 4:** Administrative Draft IS/MND
- **Task 13:** Mailing List, Contact Management System, 4 project update narratives, mailing up to 30 copies each of the NOP and NOA
- **Task 5:** Screencheck Draft IS/MND, Public IS/MND, Draft and Final NOI and Newspaper Notice
- **Task 6:** Draft and Final Responses to Comments
- **Task 7:** Draft and Final MMRP, Draft and Final NOC, Draft and Final NOD
- **Task 8:** Mailing List, Web-ready Documents, One set of Exhibits and Presentations
- **Task 9:** Pre-application Meeting Notes, Draft and Final CWA 404(b)(1) Alternatives Analysis (optional)
- **Optional Subtask 9.7:** Draft and Final Bald and Golden Eagle General Permit
- **Optional Subtask 9.8:** Administrative Draft and Final Draft Applicant-Prepared Environmental Assessment

Task 1 Project Management and Team Coordination

GEI's project manager and CEQA/NEPA lead, permitting lead, and IS/MND manager will attend a kick-off meeting with MCWRA staff to address the project work plan and schedule, and to establish processes, including communication preferences by MCWRA staff and a uniform project file system. Ryan Jolley and up to two additional key staff are also prepared to attend twice-monthly, hour-long virtual status meetings with MCWRA and Program Manager throughout the duration of the technical studies and CEQA phase. Additionally, during the permitting and after the CEQA phase is complete, monthly meetings will be held.

Ryan Jolley will maintain the project schedule developed for this proposal, including all tasks and deliverables, key milestones, and decision points. Ryan will oversee the task authorization and provide project management, including coordination with MCWRA team to complete this scope of work; providing review of all draft and final deliverables; and time for administration of the contract, preparing progress reports, and invoicing. GEI will set up a project specific MS Teams channel or SharePoint and provide MCWRA staff access for data collection, file sharing, and document reviews. GEI will develop a preliminary cost estimate for environmental mitigation measures and update the cost estimate as mitigation is developed, the MMRP is completed, and permits are obtained.

Task 2 Project Description

The project description will be based on the 60% design, anticipated to be complete in mid-2026, and other information developed by MCWRA's design team. The project description will describe the project location, project objectives, existing facilities, RSP bank stabilization, other components and

their characteristics, construction (sequence, work zones, access, equipment and storage areas, haul routes, number of workers, number of days and times, and methods), any new or different maintenance activities, and anticipated permits and approvals. GEI will work with MCWRA and the design team to identify and describe the logistical aspects of the project construction. The project description will contain figures of the regional project components, spillway components and other components, and construction areas, and will include design schematics, cross sections, and other illustrations as needed to clearly convey information.

Task 3 CEQA Documentation

Task 3.1 Finalize CEQA Strategy

Once the project description details have been identified and additional information has been collected, GEI will hold an internal workshop with our CEQA team to briefly review the Appendix G Checklist and identify the proposed analytical approach, likely impact conclusions, additional information to be collected, and begin to identify mitigation measures to address impacts that may be significant. Following this internal meeting, GEI's project manager and IS/MND manager (see staffing section for description of roles) will attend a meeting with MCWRA staff to confirm the type of CEQA document required for the project and the strategy for CEQA compliance; GEI assumes that an IS/MND will be the appropriate document to comply with CEQA requirements. At the meeting with MCWRA, GEI's leadership team will outline the analytical approach and anticipated mitigation measures based on the initial outline discussion with GEI's team. GEI will also seek input from MCWRA staff on stakeholders and key issues that MCWRA may have identified during the design process or other related activities. The intent of this approach meeting is to confirm alignment of GEI's CEQA strategy with MCWRA's expectations and minimize the need for substantial changes between the Administrative Draft and public IS/MND based on MCWRA's comments, as prioritized in the RFQ. The meeting conclusions and approach will be documented in a meeting summary, and GEI will begin preparation of the Administrative Draft IS/MND.

Information required to determine the type of CEQA document required for the Nacimiento Project:

- Conceptual design and construction information.
- Cultural resources records search, surveys, and initial assessment of impacts (Task 3.2).
- Assessment of potential erosion/scour
- Biological surveys, mapping, and initial assessment of impacts from construction and erosion/scour (Task 3.3).

Task 3.2 Prepare Cultural Resources Technical Report and Support AB 52 Consultation (New Subtask)

GEI will prepare a Cultural Resources Technical Report to support the project throughout CEQA and Section 106 of the NHPA. The technical report will present methods and findings of the following: a CHRIS records search, a desktop geoarchaeological review, archival research, a pedestrian field survey covering up to 20 acres for the Nacimiento Project, a search of the Sacred Lands File with the Native American Heritage Commission, outreach with historical societies, evaluation of resources for inclusion in the CRHR and National Register of Historic Places (NRHP), and an impacts and effects assessment. GEI's cost estimate includes evaluating the following six historic era-built environment resources will be evaluated for inclusion in the CRHR/NRHP: Nacimiento Dam, Nacimiento Lake Drive, River Road, Heritage Road, a day use ramp, and a building that have been identified within the preliminary 20-acre study area. GEI's cost estimate assumes that there are no archaeological resources within the study area and the six built environment resources within the study area will be recommended not eligible for inclusion in the CRHR/NRHP.

Additionally, GEI will assist MCWRA by providing an AB 52 assistance package that includes AB 52 notification letters, a correspondence tracker, and applicable legislation to assist MCWRA in implementing AB 52. After receipt of notification letters, Native American contacts have 30 days to reply to a request for consultation under AB 52. GEI's cost estimate assumes no tribal responses will be received to the notification letters, no tribal cultural resources will be identified, and the environmental document will result in no impact to tribal cultural resources.

Task 3.3 Prepare Biological Resources Technical Report (New Subtask)

GEI will review available information on sensitive biological resources that may be present in the vicinity of the project site, including information from the California Natural Diversity Database; the California Native Plant Society Inventory of Rare, Threatened, and Endangered Plants of California; the species list from the USFWS Information for Planning and Consultation website; and other relevant sources. GEI will evaluate the potential for all relevant special-status species to occur within the area of potential effect established for the project, including areas disturbed for construction and staging activities. GEI will review USFWS National Wetland Inventory maps, Natural Resources Conservation Service soil survey information, U.S. Geological Survey 7.5-minute series topographic maps, and aerial photographs of the project sites. GEI will conduct a reconnaissance-level survey and site evaluation of up to 20 acres for the Nacimiento Project, focusing on characterizing site conditions and onsite habitats, identifying any potential sensitive habitats, confirming habitat suitability for various special-status species, and evaluating adjacent land uses and habitats that could be impacted by the project. GEI will prepare a technical report to support CEQA and permitting using the information collected. GEI's cost estimate does not include protocol-level surveys for special-status plant or wildlife species.

Task 4 Prepare Administrative Draft IS/MND (New Task)

GEI will prepare an Administrative Draft IS/MND using a template approved by MCWRA and following the requirements of the State CEQA Guidelines for IS/MNDs. The IS/MND contents and outline will follow the strategy and approach outlined in Task 3.1 based on discussion with MCWRA staff. For each resource area section in the environmental analysis, GEI will provide a summary of the environmental and regulatory information supporting the impact analysis (i.e., at a much lesser level of detail than would be provided in an EIR), significance criteria, methods used to evaluate impacts, and detailed impact analyses. If a significant impact could occur, feasible mitigation measures will be identified to reduce the impact to a less-than-significant level to the extent possible. Information from the Interlake Tunnel and Spillway Modification Project EIR will be used to the extent possible. GEI will use conclusions developed in the environmental analysis to complete the mandatory findings.

GEI's Approach to Specific Resource Topics with Potential for Significant Impacts

- **Air Quality** – The primary air quality issue will be criteria air pollutant emissions during construction activities. GEI will use a standard air quality model to estimate construction-related emissions of criteria air pollutant for comparison to San Luis Obispo County Air Pollution Control District thresholds. We will qualitatively evaluate short-term exposure of any nearby sensitive receptors to air pollutants.
- **Biological Resources** – The plunge pool is suitable habitat for Central California Coast steelhead. Monitoring for steelhead was a requirement of the permits during the Nacimiento Dam Spillway Plunge Pool Emergency Repair Project. Given this, impacts to steelhead are expected due to work in the plunge pool and potentially post-project erosion/scour. Additionally, the project may result in impacts to nesting birds, turtles, and potentially amphibians. GEI will incorporate the findings from Task 3.3 to determine impacts to and potential mitigation for special-status species affected by the project.

- **Cultural Resources** – The primary cultural resources issue appears to be the built environment historic era cultural resources within the preliminary project area that have not yet been evaluated for inclusion in the CRHR and NRHP. GEI will incorporate the findings from Task 3.2 to determine impacts to and potential mitigation for cultural resources.
- **GHG Emissions** – GEI will develop an estimate of construction GHG emissions from the air quality model and will identify amortized emissions over the anticipated lifespan of the project. We anticipate that emissions can be mitigated with construction BMPs, offsite measures, and purchase of qualified credits, if needed.
- **Hydrology/Water Quality** – This analysis will focus on hydraulic changes from the project, primarily the potential for direct or indirect impacts during construction activities, such as in-water work and/or dewatering, changes in runoff and discharge of pollutants in stormwater, and post-project impacts to erosion/scour of the plunge pool bottom.
- **Noise and Vibration** – The project location is in an area where existing noise levels are low, and there are few sensitive receptors nearby. GEI will conduct noise modeling, if necessary, to evaluate impacts from construction-related noise and vibrations to sensitive noise receptors within distances of applicable noise and vibration thresholds of significance.

Task 5 Prepare Public IS/MND and NOI (New Task)

GEI will revise the Administrative Draft IS/MND based on one round of comments from MCWRA and coordinate with MCWRA to resolve any substantive comments. GEI will then prepare the Screencheck Public IS/MND and coordinate with MCWRA to resolve any remaining final comments, which are anticipated to be minor. GEI will then finalize the IS/MND for public review. GEI will also prepare a Notice of Intent (NOI) to adopt an MND. A newspaper notice will also be prepared and published for notifying the public of the NOI and public review and comment period.

Task 6: Prepare Responses to Comments (New Task)

CEQA does not require responding to comments received on an IS/MND. However, many lead agencies elect to prepare responses to comments to provide complete documentation in the CEQA Administrative Record. GEI will provide up to 40 hours of support to bracket, categorize, and prepare responses to comments for MCWRA.

Task 7 Prepare NOD, NOC, and MMRP (New Task)

An MMRP will be prepared using the mitigation measures identified in the IS/MND and satisfying requirements of CEQA Guidelines Section 15074(d). A table will be prepared that identifies each mitigation measure, implementation duration, monitoring duration, and responsibility for implementation and monitoring. A draft of the MMRP will be submitted to MCWRA for review and comment. GEI will then address comments and finalize the MMRP.

Task 8 Public Outreach (Renumbered Task)

GEI will support MCWRA with public outreach, including maintaining a mailing list for distribution of environmental documents, assisting with communication protocols for CEQA, providing documents in a format suitable for posting on MCWRA's website, and preparing for and participating in two public meetings, including developing electronic exhibits or presentations.

Task 9 Permits and Other Approvals (Renumbered Task)

Task 9.1 Prepare Permitting Strategy

GEI will develop a comprehensive environmental and regulatory compliance strategy plan that addresses both state and federal laws and regulations, specifically the federal and California ESAs, CWA, and Section 1602 of the California Fish and Game Code. The strategy will identify the permit types to be sought and provide potential options for satisfying habitat mitigation and other requirements. We assume that compensatory mitigation if needed, such as for habitat impacts and tree removal, can be mitigated through a mitigation bank, in-lieu fee program, or other means such as payment to the Resources Conservation District for implementation of their programs. GEI's scope of work for the Nacimientto Project assumes that FERC will not require an application for amendment of the license exemption.

GEI's Approach to Permitting Strategy

- **Identify** permitting triggers and methods and processes for obtaining required permits and authorizations.
- **Present** a detailed strategy identifying the constraints and benefits of permitting process.
- **Consider** the implications of the permitting and compensatory mitigation pathways on the objectives and schedule.
- **Summarize** general timeframes, costs, and other requirements.

Task 9.2 Prepare CWA Section 404 Permit Application

GEI assumes that the Ordinary High-Water Mark (OHWM) established in coordination with USACE for the Nacimientto Dam Spillway Emergency Repairs Project is the limit of jurisdiction and a separate ARD is not needed for the Nacimientto Project. It is assumed RCC would be placed below the OHWM, which would be considered as "fill" by USACE requiring a CWA Section 404 permit (404 permit). Additionally, demolition of the rock outcrop in the plunge pool may result in rock debris falling into the plunge pool depths, which would also constitute fill. GEI will first support MCWRA with arrangement of and attendance at a pre-application meeting with USACE for initial review and feedback on the project. GEI will recommend attendance of the pre-application meeting by RWQCB as well so that this meeting can satisfy the requirements of a pre-filing meeting by RWQCB. GEI will record meeting notes and minutes from the meeting.

The exact type of 404 permit to be used cannot be determined at this time due to uncertainty of the amount of impacts to the plunge pool and if additional impacts may occur to the Nacimientto River downstream of the plunge pool (likely temporary). The permit activity type that most resembles the project activities is bank stabilization, which corresponds to Nationwide Permit No. 13 (no other nationwide permits were initially identified by GEI as being potentially applicable). However, there are restrictions and limitations on use of Nationwide Permit No. 13 specific to the linear length of fill approved (no more than 500 feet) and fill amount per running foot of bank (no more than 1 cubic yard per running foot) that make use of this permit type uncertain. In contrast, there are no restrictions for use of an Individual Permit type, but there are more supporting documents that must be prepared for this permit type, including a CWA Section 404(b)(1) Alternatives Analysis and NEPA documentation. The appropriate permit type will be determined through development of the permitting strategy plan in Task 9.1 and USACE feedback in the pre-application meeting. However, for the purposes of this cost estimate, GEI is assuming that the permit will be an Individual Permit due to the limitations on linear length of fill approved under Nationwide Permit No. 13. GEI will be available for up to 20 hours of support during permit negotiations.

The 404(b)(1) Alternatives Analysis would be prepared under this task using the 2022 AECOM alternatives study and additional information from MCWRA, as needed, to identify the least environmentally damaging practicable alternative. An applicant-prepared Draft Environmental Assessment would be useful to efficiently and quickly satisfy NEPA compliance for an Individual Permit.

GEI will work with MCWRA to propose this approach and Optional Task 10 of our scope of work includes preparation of an applicant-prepared Environmental Assessment should it be desired by USACE. A CWA Section 404 permit also requires compliance with the NHPA Section 106, which would be supported by submitting the Cultural Resources Technical Report prepared by GEI in Task 3.2 of this scope, and compliance with ESA Section 7, which would be supported by submitting the Biological Assessment prepared by GEI in Task 9.5 of this scope.

Task 9.3 Prepare CWA Section 401 Water Quality Certification Application

Based on previous experience from the Nacimiento Dam Spillway Emergency Repairs Project, GEI knows that RWQCB considers the plunge pool to be a jurisdictional water of the state. It is assumed that the Water Quality Certification (WQC) will cover the same placement of materials into the plunge pool as is being covered in the CWA 404 permit. It is assumed that an Individual WQC will be the appropriate application type as there are no General Orders that meet project needs. GEI recommends that RWQCB will be present at the pre-application meeting with USACE and that meeting will meet the requirements of the pre-filing meeting such that a separate meeting with RWQCB is not needed. GEI will be available for up to 20 hours of support during permit negotiations.

Task 9.4 Prepare LSAA Notification

It is assumed that CDFW will assert jurisdiction over the plunge pool to the top-of-bank of the plunge pool. To prepare the Lake and Streambed Alteration Agreement (LSAA) Notification, GEI will collect additional project information from MCWRA, as needed, such as information on need for removal of trees, hydraulic and hydrologic conditions of the plunge pool post-project, and possible dewatering plans. GEI will be available for up to 20 hours of support during permit negotiations.

Task 9.5 Prepare USFWS and NMFS Joint Biological Assessment

It is assumed that a Biological Assessment will be required because the dewatering and placement of materials into the plunge pool may affect and could result in “take” of fish and wildlife species listed under the federal ESA, including Central California Coast steelhead and species covered by USFWS, such as amphibians and California Condors. GEI will rely on information gathered during Task 3.3 to compile the environmental baseline and will analyze the impacts of project implementation and operations and maintenance of the project site. GEI will be available for up to 20 hours of support during permit negotiations.

Task 9.6 Prepare CESA Incidental Take Permit Application

It is assumed that an Incidental Take Permit (ITP) will be required because the dewatering and placement of materials into the plunge pool may affect and could result in “take” of wildlife species listed or proposed for listing under the California Endangered Species Act (CESA), specifically bald eagle and steelhead (but not golden eagle, which is fully protected). GEI will rely on information gathered during Task 3.2 to compile the environmental baseline. If focused eagle surveys are needed for the ITP, based on the reconnaissance surveys and permitting strategy, then GEI can provide these additional surveys with a contract amendment.

Optional Task 9.7 Prepare Golden and Bald Eagle General Take Permit Application

Bald and golden eagles are protected by the USFWS. Project disturbances within 660 feet of bald and golden eagle nests that result in the mortality of eagles and/or removal of nests require permits from USFWS. If bald and golden eagle nests are observed by GEI within 660 feet of the project area, GEI will assist MCWRA with obtaining a General Permit from USFWS for these species.

Optional Task 9.8. Applicant-Prepared Environmental Assessment (New Optional Task)

If requested by USACE to support NEPA compliance for the CWA Section 404 Individual Permit, GEI will efficiently prepare an applicant-prepared Environmental Assessment using the IS/MND text and additional information required by NEPA. GEI will first prepare an Administrative Draft Environmental Assessment for MCWRA's review and comment and then finalize the Final Draft Environmental Assessment for submittal to USACE. After this document is submitted to USACE, GEI will be available for up to 30 hours of additional support to finalize the Environmental Assessment and NEPA compliance.

3. Project Schedule

GEI's proposed schedule for the Nacimientto Project scope of work is presented in **Figure 3**. The Administrative Draft IS/MND would be completed shortly after the San Antonio Project Administrative Draft EIR because of the priority of meeting the DSOD deadline for the San Antonio Project.

4. Tasks Required by MCWRA Staff

MCWRA will need to collect or facilitate meetings with the design team for GEI to collect project information needed to prepare the EIR project description and environmental analysis. MCWRA should also provide information on currently known internal and external stakeholders and their issues.

5. Innovative and/or Creative Approaches

GEI's proposal for the Nacimientto Project includes the following additional approaches to maximize efficient, cost-effective operations, and/or increased performance capabilities.

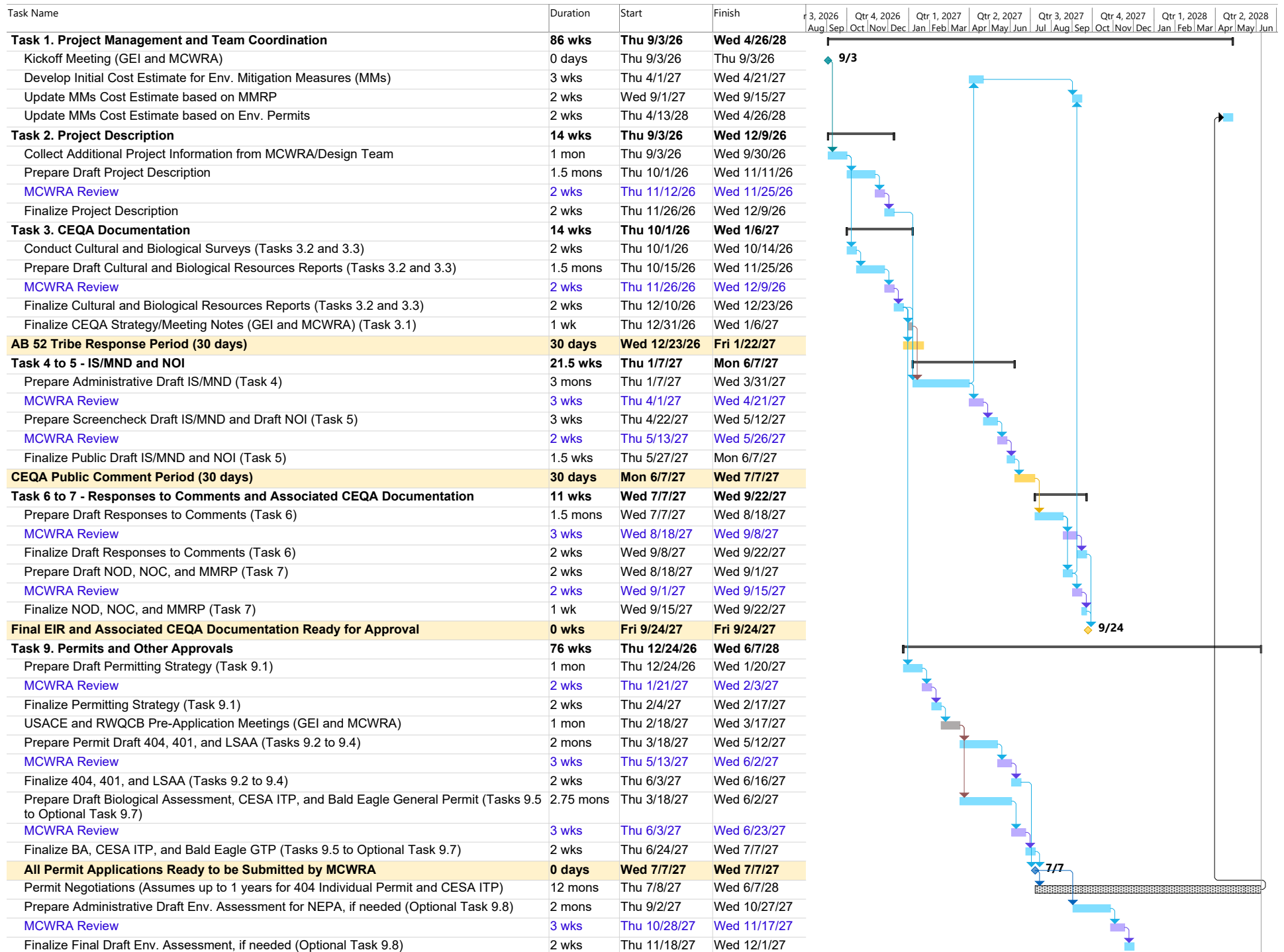
- Field surveys for both the San Antonio and Nacimientto Projects would be conducted during the same staff mobilization to use the same staff and reduce travel time and expenses.
- Information in MCWRA's Interlake Tunnel and Spillway Modification Project Draft EIR will be leveraged and used to prepare the IS/MND to the extent possible, including information from the environmental and regulatory settings and mitigation measures (to be adapted for the project as needed).
- Using staff that have relevant experience working on the same types of projects with similar issues, which means there's no learning curve; this includes working with the same regulatory agencies and staff on other MCWRA projects.

Project Information Needed from MCWRA

- **Project design** – RCC bank stabilization design and extents, rock outcrop removal, project footprint, and any new or different maintenance needs.
- **Construction plans** – limits of ground disturbance, access routes and any improvements, staging areas, construction schedule and sequence, construction equipment details, quantities of import and export materials, and number of workers and truck trips.
- **As-builts** for existing built environment resources to conduct the cultural resources evaluation.

While the San Antonio and Nacimientto Projects have similar CEQA schedules, GEI does not recommend including these projects in the same CEQA document because an IS/MND is anticipated for the Nacimientto Project, and including it in an EIR with the San Antonio Project would require a more detailed analysis of the Nacimientto Project than would otherwise occur, such as for cumulative impacts and alternatives. In addition, delays in the Nacimientto Project design or assessment could delay the San Antonio Project, which is on a critical schedule to be constructed by the DSOD deadline of December 31, 2031.

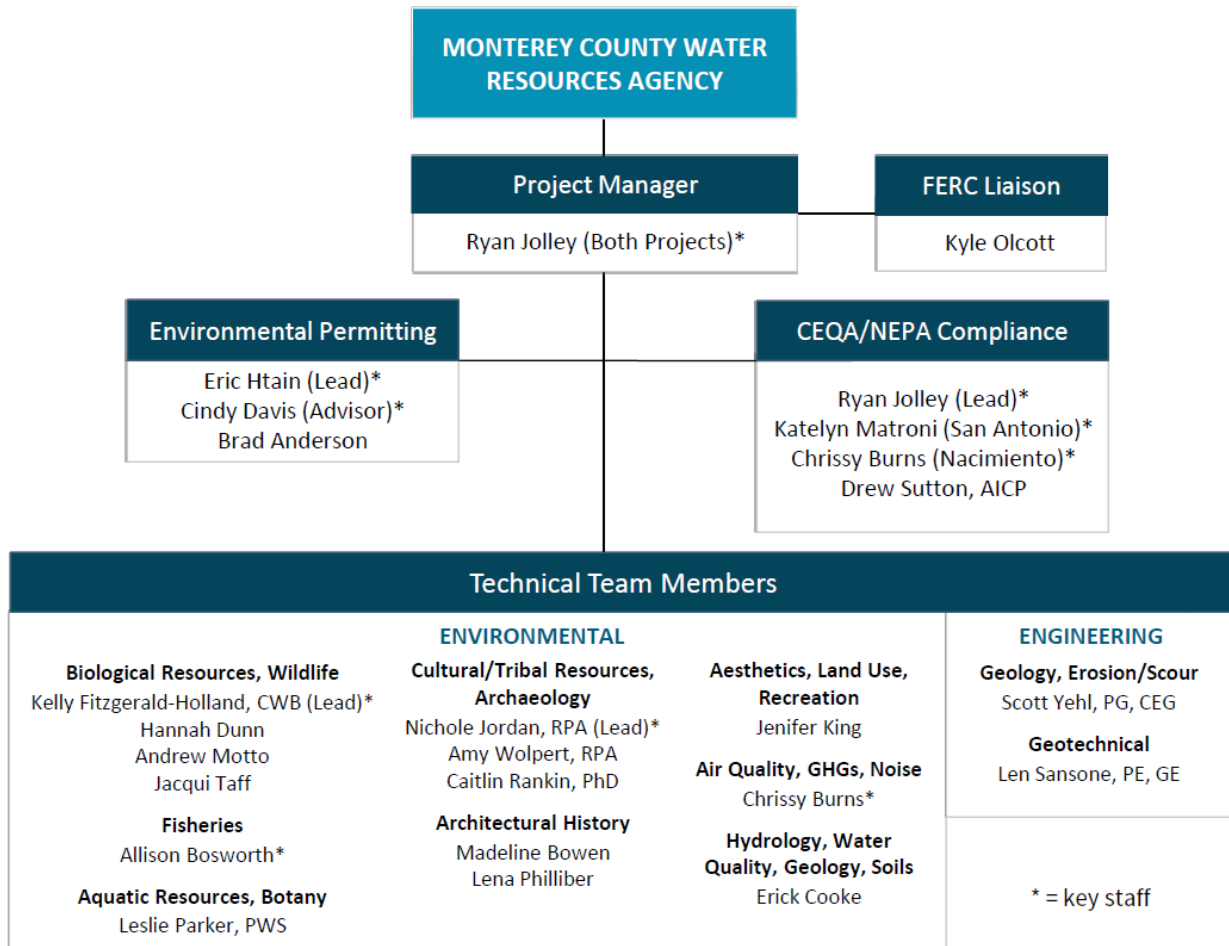
Figure 3. Proposed Nacimiento Project Schedule



Staffing

An overview of the GEI Team is provided in **Figure 4**. The staffing plan, inclusive of all GEI staff supporting the San Antonio Project is presented in **Table 1** and the Nacimientto Project is presented in **Table 2**. Each staffing plan describes the role and hours for each person assigned to the project.

Figure 4. GEI Team Organizational Chart for Both Projects



Approach to Managing Both Projects

The GEI Team provides a single project manager, Ryan Jolley, to lead both projects concurrently. As the primary point-of-contact and lead, Ryan can easily prioritize and manage tasks and team resources for both projects among the GEI Team, as needed to meet MCWRA's needs, and any changes in direction once work begins. The GEI Team also provides a single lead for CEQA/NEPA compliance, Ryan Jolley, and another for permitting, Eric Htain, for both projects. This allows us to provide continuity and consistent analysis and interpretation of regulations across both projects, which is extremely important for stakeholder understanding and in addressing their issues consistently. In addition, this approach allows MCWRA to easily work with only two people to manage all environmental compliance for both projects. The GEI Team also provides separate staff to help Ryan manage and coordinate each CEQA document concurrently—Katelyn Matroni for the San Antonio Project and Chrissy Burns for the Nacimientto Project. Katelyn and Chrissy have supported Ryan on numerous projects and they have a strong, experienced working relationship. The technical team will support both projects, providing them familiarity with the resources and regulations in the area on the first project that can be applied to the second.

Table 1. GEI's San Antonio Project Staffing Plan

Staff		San Antonio Project Role	Hours ¹
Project Leadership	Ryan Jolley	Project manager (primary point-of-contact, invoicing, schedule and budget management), lead CEQA/NEPA compliance strategy, direct preparation of CEQA documentation, including the EIR, review all deliverables	183
	Katelyn Matroni	Manage and coordinate preparation of the EIR and other CEQA documentation, prepare project description, alternatives analysis, and various CEQA sections	497
	Drew Sutton, AICP	QA/QC review of CEQA documentation and input on strategy and approach	28
	Eric Htain	Lead permitting strategy, permit applications, and agency coordination; identify technical study needs to support permitting	52
	Cindy Davis	Provide strategic advice to Eric on permitting strategy and agency coordination, QA/QC review of permitting strategy TM and permit applications if needed	2
Biological Team	Kelly Fitzgerald-Holland, CWB	Lead biological resources team, lead analysis of biological resources and wildlife impacts for CEQA and permitting, if needed	62
	Allison Bosworth	Conduct fisheries research and analysis, prepare fisheries CEQA analysis	28
	Leslie Parker, PWS	Conduct wetlands/aquatic resources and rare plant research, surveys, and analysis; prepare jurisdictional delineation, if needed	94
	Hannah Dunn	Conduct terrestrial biological resources research, surveys, and analysis; prepare terrestrial biological resources CEQA analysis and ESA/CESA permits	90
	Andrew Motto	Conduct terrestrial biological resources research, surveys, and analysis; prepare terrestrial biological resources CEQA analysis and ESA/CESA permits	46
	Jacqui Taff	Conduct terrestrial biological resources research, surveys, and analysis	40
Cultural Team	Nichole Jordan, RPA	Lead cultural resources team (research, surveys, approach); lead analysis of impacts/effects to cultural and Tribal Cultural Resources for CEQA and Section 106, when required	73
	Madeline Bowen	Lead built environment research, analysis, evaluations and impacts/effects assessment to cultural resources for CEQA and Section 106, when required	46
	Lena Philliber	Conduct built environment research, surveys, analysis, and evaluation; support cultural resources CEQA analysis	136
	Caitlin Rankin, PhD	Conduct desktop geoarchaeological assessment; prepare paleontological CEQA analysis	24
	Amy Wolpert, RPA	Conduct archaeological research, surveys, and analysis; prepare cultural and Tribal Cultural Resources CEQA analysis	116
Other	Chrissy Burns	Conduct air quality and GHG emissions modeling; prepare air quality, GHG, and noise CEQA analysis	159
	Jenifer King	Prepare aesthetics, recreation, land use, and other various CEQA analysis	159
	Erick Cooke	Prepare hydrology/water quality and geology and soils CEQA analysis	50
	Brad Anderson	Support preparation of permit applications, prepare various CEQA analyses	16
	Scott Yehl, PG, CEG	Provide geologic expertise, including back stabilization, and erosion and scour of plunge pool for the project description and CEQA analysis	4
	Len Sansone, PE, GE	Provide expertise on geotechnical engineering issues for the project description and CEQA analysis	4
	Ryan Snyder	Prepare Geographic Information Systems maps/figures	104
	Margurite Myers	Word processing including document formatting and editing	78

Note: ¹ Hours on the project does not include Optional Task 15.

Table 2. GEI's Nacimiento Project Staffing Plan

	Staff	Nacimiento Project Role	Hours ¹
Project Leadership	Ryan Jolley	Project manager (primary point-of-contact, invoicing, schedule and budget management), lead CEQA/NEPA compliance strategy, direct preparation of CEQA documentation including the EIR, review all deliverables	176/12
	Chrissy Burns	Manage and coordinate preparation of the IS/MND and other CEQA documentation; prepare project description; conduct air quality and GHG emissions modeling; prepare air quality, GHG, and noise CEQA analysis	293/50
	Drew Sutton, AICP	QA/QC review of CEQA documentation and input on strategy and approach	14/20
	Eric Htain	Lead permitting strategy TM, permit applications, and agency coordination; identify technical study needs to support permitting	166/2
	Cindy Davis	Provide strategic advice to Eric on permitting strategy and agency coordination, QA/QC review of permitting strategy TM and permit applications, if needed	14/0
Biological Team	Kyle Olcott	Ensure technical studies and compliance documents produced by GEI satisfy FERC requirements as needed	8/4
	Kelly Fitzgerald-Holland, CWB	Lead biological resources team, lead analysis of wildlife and impacts for CEQA, permit applications, lead USFWS portion of Biological Assessment	96/4
	Allison Bosworth	Conduct fisheries research, surveys, and analysis; prepare fisheries CEQA analysis and NMFS portion of Biological Assessment; support bald eagle permitting	122/20
	Leslie Parker, PWS	Conduct wetlands/aquatic resources and rare plant research, surveys, and analysis; prepare delineation of waters of the U.S./state	4/0
	Hannah Dunn	Conduct terrestrial biological resources research, surveys, and analysis; prepare terrestrial biological resources CEQA analysis and ESA/CESA permits	70/10
	Andrew Motto	Conduct terrestrial biological resources research, surveys, and analysis; prepare terrestrial biological resources CEQA analysis and ESA/CESA permits	120/10
	Jacqui Taff	Conduct terrestrial biological resources research, surveys, and analysis	80/0
	Nichole Jordan, RPA	Lead cultural resources team (research, surveys, approach); lead analysis of impacts/effects to cultural and Tribal Cultural Resources for CEQA and Section 106, when required	70/2
	Madeline Bowen	Lead built environment research, analysis, evaluations and impacts/effects assessment to cultural resources for CEQA and Section 106, when required	46/0
	Lena Philliber	Conduct built environment research, surveys, analysis, and evaluation; support cultural resources CEQA analysis	154/10
Cultural Team	Caitlin Rankin, PhD	Conduct desktop geoarchaeological assessment; prepare paleontological CEQA analysis	18/0
	Amy Wolpert, RPA	Conduct archaeological research, surveys, and analysis; prepare cultural and Tribal Cultural Resources CEQA analysis	124/10
	Jenifer King	Prepare aesthetics, recreation, land use, and other various CEQA analysis	40/20
	Erick Cooke	Prepare hydrology/water quality and geology and soils CEQA analysis	36/0
	Katelyn Matroni	Prepare various CEQA analyses	30/20
	Brad Anderson	Support preparation of permit applications	216/0
	Scott Yehl, PG, CEG	Provide geologic expertise to support analysis for CEQA and permitting	8/0
	Len Sansone, PE, GE	Provide expertise on geotechnical engineering issues for the project description and CEQA analysis	4/0
	Ryan Snyder	Prepare Geographic Information Systems maps/figures	95/0
	Margurite Myers	Word processing including document formatting and editing	68/10
Other			

Note: ¹ Hours for Tasks 1 through 9.6 are left of the slash / and additional hours for Optional Subtasks 9.7 and 9.8 are listed to the right



Appendix A1: San Antonio Project Cost Proposal

San Antonio Dam Spillway Replacement Project
GEI Detailed Cost Estimate

		Env. Grade 8 Senior Consultant	Eng. Grade 8 Senior Consultant	Env. Grade 7 Senior Professional	Env. Grade 6 Senior Professional	Eng. Grade 5 Senior Professional	Env. Grade 5 Senior Professional	Env. Grade 4 Project Professional	Env. Grade 2 Project Professional	Env. Grade 1 Staff Professional	Word Processor		
Task	Task Name	\$368	\$315	\$275	\$220	\$238	\$195	\$160	\$120	\$100	\$100	Total Hours	Total Dollars
1	Project Management and Team Coordination												
	Meetings (1 kickoff meeting and 34 bi-monthly 1 hours meetings from Sept 2026 to January 2028)		38	38			38					114	\$ 29,830
	Project administration and coordination (assumes 17 months of work)		42	2								44	\$ 13,780
	Mitigation measures cost estimate		4	8			8					20	\$ 5,020
	Subtotal Task 1	0	84	48	0	0	46	0	0	0	0	178	\$ 48,630
2	Project Description												
		4	5	2		4	75	30				120	\$ 23,974
3	Initial Study and NOP												
			8	14	4		98	44				168	\$ 33,400
4	EIR Preparation												
4.1	Finalize CEQA Strategy		4				6					10	\$ 2,430
4.2	Prepare Cultural Resources Technical Memorandum and Support AB 52 Consultation			25	30			96	120		8	279	\$ 44,035
4.3	Conduct Biological Resources Survey			20			30	30		40	8	128	\$ 20,950
	Subtotal Task 4	0	4	45	30	0	36	126	120	40	16	417	\$ 67,415
5	Prepare Administrative Draft EIR												
	Introduction						10					10	\$ 1,950
	Aesthetics						40	8				48	\$ 9,080
	Air Quality (including emissions modeling)							60				60	\$ 9,600
	Biological Resources			8			28	10				46	\$ 9,260
	Cultural Resources			8	8			16	16			48	\$ 8,440
	Geology and Soils			24				22				46	\$ 10,120
	Greenhouse Gas Emissions (emissions modeling covered under air quality)							24				24	\$ 3,840
	Hazards and Hazardous Materials						30					30	\$ 5,850
	Hydrology and Water Quality			24				6				30	\$ 7,560
	Noise							40				40	\$ 6,400
	Tribal Cultural Resources			16				16				32	\$ 6,960
	Wildfire						24					24	\$ 4,680
	Other CEQA except Cumulative						8					8	\$ 1,560
	Cumulative Impacts						40					40	\$ 7,800
	Alternatives						40					40	\$ 7,800
	Executive Summary						20					20	\$ 3,900
	Compile and Review Administrative Draft EIR		20	16			30				6	72	\$ 17,150
	Subtotal Task 5	0	20	96	8	0	270	202	16	0	6	618	\$ 121,950
6	Prepare Draft EIR and NOA												
			10	10	2		47	15			24	108	\$ 20,305
7	Prepare Draft Responses to Comments												
	(assumes up to 60 hours to prepare draft responses)		16	12	2		42				10	82	\$ 17,970
8	Prepare Administrative Final EIR												
			8	8			40	8			8	72	\$ 14,600
9	Prepare Final EIR												
			4				24					28	\$ 5,940
10	Prepare Findings, Statement of Overriding Considerations, NOD, and MMRP												
			6				20				2	28	\$ 5,990
11	Final EIR Certification/Public Outreach												
			4				10					14	\$ 3,210
12	Public Meetings												
			10				10					20	\$ 5,100
13	Public Outreach												
				4			8				8	20	\$ 3,460
14	Permits and Other Approvals												
14.1	Conduct Aquatic Resources Delineation		2		90			68			4	164	\$ 31,710
14.2	Prepare Permitting Strategy		4	26	4		20					54	\$ 13,190
	Subtotal Task 14	0	6	26	94	0	20	68	0	0	4	218	\$ 44,900
15	OPTIONAL TASK: Prepare and Process Permit Applications (If required)												
	Cost TBD at a later date, if needed, based on Task 14 Deliverable											TBD	TBD
	Total Labor Hours	4	185	265	140	4	746	493	136	40	78	2,091	
	Total Labor Dollars	\$1,472	\$58,275	\$72,875	\$30,800	\$952	\$145,470	\$78,880	\$16,320	\$4,000	\$7,800		\$ 416,844

Other Direct Costs		
Cultural Resources Records Search and Survey Travel Expenses (Task 4.2)	\$	3,200
Biological Survey Travel Expenses (Task 4.3)	\$	2,200
Kickoff and Public Meeting Travel Expenses (Tasks 1 and 12)	\$	2,700
Total Other Direct Costs	\$	8,100

Total Estimated Project Cost WITHOUT Optional Task 15 \$ 424,944

FEE SCHEDULE

<u>Personnel Category</u>	<u>Hourly Billing Rate</u> \$ per hour
Word Processor	\$ 100
Environmental Staff Professional – Grade 1	\$ 100
Environmental Staff Professional – Grade 2	\$ 120
Environmental Project Professional – Grade 3	\$ 145
Environmental Project Professional – Grade 4	\$ 160
Environmental Senior Professional – Grade 5	\$ 195
Engineering Senior Professional – Grade 5	\$ 238
Environmental Senior Professional – Grade 6	\$ 220
Environmental Senior Professional – Grade 7	\$ 275
Environmental Senior Consultant – Grade 8	\$ 315
Engineering Senior Consultant – Grade 8	\$ 368

These rates are billed for both regular and overtime hours in all categories.

Rates will increase up to 5% annually, at GEI's option, for all contracts that extend into the next calendar year. Rates for Deposition and Testimony are increased 1.5 times.

OTHER PROJECT COSTS

Subconsultants, Subcontractors and Other Project Expenses - All costs for subconsultants, subcontractors and other project expenses will be billed at cost plus a 4% service charge. Examples of such expenses ordinarily charged to projects are subcontractors; subconsultants: chemical laboratory charges; rented or leased field and laboratory equipment; outside printing and reproduction; communications and mailing charges; reproduction expenses; shipping costs for samples and equipment; disposal of samples; rental vehicles; fares for travel on public carriers; special fees for insurance certificates, permits, licenses, etc.; fees for restoration of paving or land due to field exploration, etc.; state and local sales and use taxes and state taxes on GEI fees. The 4% service charge will not apply to GEI-owned equipment and vehicles or in-house reproduction expenses.

Field and Laboratory Equipment Billing Rates – GEI-owned field and laboratory equipment such as pumps, sampling equipment, monitoring instrumentation, field density equipment, portable gas chromatographs, etc. will be billed at a daily, weekly, or monthly rate, as needed for the project. Expendable supplies are billed at a unit rate.

Transportation and Subsistence - Automobile expenses for GEI or employee-owned cars will be charged at the rate per mile set by the Internal Revenue Service for tax purposes plus tolls and parking charges or at a day rate negotiated for each project. When required for a project, four-wheel drive vehicles owned by GEI or the employees will be billed at a daily rate appropriate for those vehicles. Per diem living costs for personnel on assignment away from their home office will be negotiated for each project.

PAYMENT TERMS

Invoices will be submitted monthly or upon completion of a specified scope of service, as described in the accompanying contract (proposal, project, or agreement document that is signed and dated by GEI and CLIENT).

Payment is due upon receipt of the invoice. Interest will accrue at the rate of 1% of the invoice amount per month, for amounts that remain unpaid more than 30 days after the invoice date. All payments will be made by either check or electronic transfer to the address specified by GEI and will include reference to GEI's invoice number.

Appendix A2: Nacimiento Project Cost Proposal

Nacimiento Dam Plunge Pool Project

GEI Detailed Cost Estimate

		Eng. Grade 8 Senior Consultant	Env. Grade 8 Senior Consultant	Env. Grade 7 Senior Professional	Env. Grade 6 Senior Professional	Env. Grade 5 Senior Professional	Eng. Grade 5 Senior Professional	Env. Grade 5 Senior Professional	Env. Grade 4 Project Professional	Env. Grade 2 Project Professional	Env. Grade 1 Staff Professional	Word Processor	Total Hours	Total Dollars
Task	Task Name	\$383	\$315	\$275	\$220	\$220	\$253	\$195	\$160	\$120	\$100	\$100		
1	Project Management and Coordination													
	Meetings (1 kickoff meeting and 42 bi-weekly 1 hours meetings from Sept 2026 to June 2028)		46	46					46				138	\$ 34,500
	Project administration and coordination (assumes 21 months of work)		63	10		8							81	\$ 24,355
	Mitigation measures cost estimate		4	14					8				26	\$ 6,390
	Subtotal Task 1	0	113	70	0	8	0	0	54	0	0	0	245	\$ 65,245
2	Project Description													
		2	4	4	0	0	2	0	74	0	0	0	86	\$ 15,472
3	CEQA Documentation													
3.1	Finalize CEQA Strategy	2	4				2		6				14	\$ 3,492
3.2	Prepare Cultural Resources Technical Report and Support AB 52 Consultation		2	34	38				111	138		8	331	\$ 53,460
3.3	Prepare Biological Resources Technical Report		2	20				60	30		40	8	160	\$ 27,430
	Subtotal Task 3	8	2	54	38	0	2	60	147	138	40	16	505	\$ 84,382
4	Prepare Administrative Draft IS/MND													
	Aesthetics							14					14	\$ 2,730
	Agriculture and Forestry							5					5	\$ 975
	Air Quality (including emissions modeling)								40				40	\$ 6,400
	Biological Resources			8				28	10				46	\$ 9,260
	Cultural Resources			8	8				16	16			48	\$ 8,440
	Energy								5				5	\$ 800
	Geology and Soils			16			4		10				30	\$ 7,012
	Greenhouse Gas Emissions (emissions modeling covered under air quality)								20				20	\$ 3,200
	Hazards and Hazardous Materials							12					12	\$ 2,340
	Hydrology and Water Quality			20									20	\$ 5,500
	Land Use and Planning								4				4	\$ 780
	Mineral Resources								4				4	\$ 780
	Noise								16				16	\$ 2,560
	Population and Housing							2					2	\$ 390
	Public Services							4					4	\$ 780
	Recreation							5					5	\$ 975
	Transportation							4					4	\$ 780
	Tribal Cultural Resources			16					16				32	\$ 6,960
	Utilities and Service Systems							4					4	\$ 780
	Wildfire							10					10	\$ 1,950
	Mandatory Findings							2					2	\$ 390
	Compile and Review Administrative Draft IS/MND		15	10					16			4	45	\$ 10,435
	Subtotal Task 4	0	15	78	8	0	4	98	149	16	0	4	372	\$ 74,217
5	Prepare Public IS/MND and NOI													
			6						30			10	46	\$ 7,690
6	Prepare Responses to Comments													
	(assumes up to 30 hours to prepare draft responses)		8	10					20			4	42	\$ 8,870
7	Prepare NOD, NOC, and MMRP													
			2						16			2	20	\$ 3,390
8	Public Outreach													
			8						20				28	\$ 5,720
9	Permits and Other Approvals													
9.1	Prepare Permitting Strategy		6	26	4			20				8	64	\$ 14,620
9.2	Prepare CWA Section 404 Individual Permit Application (includes 404(b)(1) alts. analysis)		4	30				100	10				144	\$ 30,610
9.3	Prepare CWA Section 401 Water Quality Certification Application		4	30				70	10			8	122	\$ 25,560
9.4	Prepare LSAA Notification		4	30				70	10				114	\$ 24,760
9.5	Prepare USFWS and NMFS Joint Biological Assessment		4	20				50	30		20	8	132	\$ 24,110
9.6	Prepare CESA Incidental Take Permit Application		4	30				60	30		20	8	152	\$ 28,810
	Subtotal Subtasks 9.1-9.6	0	26	166	4	0	0	370	90	0	40	32	728	\$ 148,470
9.7	OPTIONAL SUBTASK: Prepare Bald Eagle General Take Permit Application (if needed)		2	4				20					26	\$ 5,630
9.8	OPTIONAL SUBTASK: Prepare Applicant Prepared Environmental Assessment (If requested by USACE)		10	24		4		50	70	10		10	178	\$ 33,780
	Subtotal OPTIONAL SUBTASKS 9.7 and 9.8	0	12	28	0	4	0	70	70	10	0	10	204	\$ 39,410

Labor Total WITHOUT Optional Subtasks 9.7 and 9.8

Total Labor Hours Tasks 1-9.6	10	184	382	50	8	8	528	600	154	80	68	2,072	
Total Labor Dollars Tasks 1-9.6	\$61,346	\$1,100	\$79,942	\$5,920	\$800	\$2,024	\$102,960	\$96,000	\$18,480	\$8,000	\$6,800		\$ 413,456

Labor Total INCLUDING Optional Subtasks 9.7 and 9.8

Total Labor Hours Tasks 1-9.8	10	196	410	50	12	8	598	670	164	80	78	2,276	
Total Labor Dollars Tasks 1-9.8	\$65,126	\$1,100	\$86,662	\$5,920	\$1,200	\$2,024	\$116,610	\$107,200	\$19,680	\$8,000	\$7,800		\$ 452,866

Other Direct Costs

Cultural Resources Records Search and Survey Travel Expenses (Task 3.2)	\$ 3,200
Biological Survey Travel Expenses (Task 3.3)	\$ 2,200
Kickoff and Public Meeting Travel Expenses (Tasks 1 and 12)	\$ 1,700
Total Other Direct Costs	\$ 7,100

Total Estimated Project Cost WITHOUT Optional Subtasks 9.7 and 9.8	\$ 420,556
Total Estimated Project Cost INCLUDING Optional Subtasks 9.7 and 9.8	\$ 459,966

FEE SCHEDULE

<u>Personnel Category</u>	<u>Hourly Billing Rate</u> \$ per hour
Word Processor	\$ 100
Environmental Staff Professional – Grade 1	\$ 100
Environmental Staff Professional – Grade 2	\$ 120
Environmental Project Professional – Grade 3	\$ 145
Environmental Project Professional – Grade 4	\$ 160
Environmental Senior Professional – Grade 5	\$ 195
Engineering Senior Professional – Grade 5	\$ 238
Environmental Senior Professional – Grade 6	\$ 220
Environmental Senior Professional – Grade 7	\$ 275
Environmental Senior Consultant – Grade 8	\$ 315
Engineering Senior Consultant – Grade 8	\$ 368

These rates are billed for both regular and overtime hours in all categories.

Rates will increase up to 5% annually, at GEI's option, for all contracts that extend into the next calendar year. Rates for Deposition and Testimony are increased 1.5 times.

OTHER PROJECT COSTS

Subconsultants, Subcontractors and Other Project Expenses - All costs for subconsultants, subcontractors and other project expenses will be billed at cost plus a 4% service charge. Examples of such expenses ordinarily charged to projects are subcontractors; subconsultants: chemical laboratory charges; rented or leased field and laboratory equipment; outside printing and reproduction; communications and mailing charges; reproduction expenses; shipping costs for samples and equipment; disposal of samples; rental vehicles; fares for travel on public carriers; special fees for insurance certificates, permits, licenses, etc.; fees for restoration of paving or land due to field exploration, etc.; state and local sales and use taxes and state taxes on GEI fees. The 4% service charge will not apply to GEI-owned equipment and vehicles or in-house reproduction expenses.

Field and Laboratory Equipment Billing Rates – GEI-owned field and laboratory equipment such as pumps, sampling equipment, monitoring instrumentation, field density equipment, portable gas chromatographs, etc. will be billed at a daily, weekly, or monthly rate, as needed for the project. Expendable supplies are billed at a unit rate.

Transportation and Subsistence - Automobile expenses for GEI or employee-owned cars will be charged at the rate per mile set by the Internal Revenue Service for tax purposes plus tolls and parking charges or at a day rate negotiated for each project. When required for a project, four-wheel drive vehicles owned by GEI or the employees will be billed at a daily rate appropriate for those vehicles. Per diem living costs for personnel on assignment away from their home office will be negotiated for each project.

PAYMENT TERMS

Invoices will be submitted monthly or upon completion of a specified scope of service, as described in the accompanying contract (proposal, project, or agreement document that is signed and dated by GEI and CLIENT).

Payment is due upon receipt of the invoice. Interest will accrue at the rate of 1% of the invoice amount per month, for amounts that remain unpaid more than 30 days after the invoice date. All payments will be made by either check or electronic transfer to the address specified by GEI and will include reference to GEI's invoice number.