Appendix FEIR-2

Jurisdictional Waters Memorandum

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M E M O R A N D U M

Date:	March 26, 2025
From:	Christopher Julian Principal Regulatory Specialist cjulian@rinconconsultants.com
Subject:	**Jurisdictional Waters Delineation for the Valencia Commerce Center and Entrada South Planning Areas in Los Angeles County, California**
Attachments:	Attachment 1 Christopher Julian Curriculum Vitae

This technical memorandum clarifies the methods used to delineate jurisdictional waters within the Valencia Commerce Center (VCC) Planning Area and Entrada South Planning Area in Los Angeles County, California (County). Rincon Consultants, Inc. (Rincon) performed on-site field delineations of jurisdictional waters within the VCC Planning Area, documented in a Jurisdictional Delineation Report dated February 2024, and the Entrada South Planning Area, documented in a Jurisdictional Delineation Report dated February 2020, both of which were cited in the County's Draft Supplemental EIR (DSEIR) for the Entrada South and VCC Project (SCH # 2000011025).[1] The Jurisdictional Delineation Report for the VCC Planning Area separately identifies waters of the State and waters of the United States, which differ due to the presence of two storm drain outlet channels that qualify as potential waters of the State but not as waters of the United States. The Jurisdictional Delineation Report for the Entrada South Planning Area does not delineate waters of the State separately from waters of the United States; as stated in the DSEIR, all waters of the United States within the Entrada South Planning Area are also considered to be waters of the State. *See* DSEIR p. 5.2-53.

The Los Angeles Regional Water Quality Control Board (RWQCB) provided written comments on the DSEIR, in which the agency questioned the methods used to delineate waters of the State in the two Planning Areas. While no California agency has adopted a legal standard for delineating non-wetland waters of the State, and the RWQCB's comments did not identify a preferred method of delineating waters of the State, Rincon's delineations relied upon longstanding procedures employed by the U.S. Army Corps of Engineers (USACE), which have been used and accepted for delineating waters of the State in the Los Angeles region for many years. A more detailed description is provided below.

BACKGROUND AND DEFINITIONS

The term "waters of the State" is defined in the Porter-Cologne Water Quality Control Act (California Water Code Section 13050(e)) as follows:

> *"Waters of the State" means any surface water or groundwater, including saline waters, within the boundaries of the state.*

The Porter-Cologne Water Quality Control Act and associated regulations do not specify how this definition should be applied or translated to delineate any particular area as jurisdictional waters of the State, including how to determine the lateral limits of any non-wetland waters such as streams.

[1] As described in the attached CV, the author is a professional biologist with more than 20 years of experience in the Los Angeles region and has performed more than 100 delineations of jurisdictional waters.

However, the State Water Resources Control Board's (SWRCB) "*State Policy for Water Quality Control: State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*" (Procedures), adopted in 2021, offer some additional clarification.

Where wetland waters of the State are concerned, the Procedures provide the following definition:

> "*An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation*."

This definition invokes the three parameters used by the USACE to delineate wetland waters of the United States for purposes of the Clean Water Act: wetland hydrology, predominance of hydrophytic vegetation, and hydric soils. Consistent with this approach, the Procedures direct that, for purposes of delineating wetland waters of the State, the Water Boards will accept any wetland area delineation from a final aquatic resource report verified by the USACE. Absent a USACE-verified delineation, the Procedures direct that federal methods described in the USACE's Wetland Delineation Manual and relevant supplements should be used to determine whether the area meets the state definition of a wetland. Thus, at least where wetland waters of the State are concerned, the Water Boards' delineation procedures mirror federal procedures.

In non-tidal waters when adjacent wetlands are absent, the USACE's regulations (33 CFR 328.4) specify that the Ordinary High Water Mark (OHWM) is the lateral limit of waters of the United States. Because the Procedures do not specify a delineation method for non-wetland waters of the State, and rely upon federal procedures for delineating wetlands, Rincon's delineation relied upon federal procedures to delineate non-wetland waters of the State as well, where applicable. This approach is consistent with SWRCB regulations (23 CCR 3831(w)), which state that all waters of the United States in California are also waters of the State and do not suggest that the federal and State jurisdictional limits for an individual feature would differ. It is also consistent with longstanding precedent in the region, where the RWQCB has routinely issued water quality certification for proposed discharges to waters of the United States without requesting that waters of the State be delineated more expansively than waters of the United States in the same features.

APPLICATION TO SPECIFIC FEATURES

VCC Planning Area

As described in the Rincon delineation and the DSEIR, the VCC Planning Area contains reaches of two natural streams (Castaic Creek and Hasley Creek), two storm drain outlet channels tributary to Hasley Creek, and two manmade features (Live Oak Road Detention Basin and Old Road Agricultural Ditch). DSEIR, pp. 5.2-56 – 5.2-61, Appendix 5.2d, pp. 8-15. Waters of the State within the two natural streams were delineated to the OHWM, for the reasons given above. With regard to Castaic Creek and Hasley Creek, the RWQCB's comment letter states that, for streams, the limits of waters of the State "generally extend beyond those of waters of the US" delineated using the OHWM. However, as stated above, the OHWM is typically used to delineate the lateral limits of waters of the State where adjacent wetlands are absent, and Rincon has not, nor did the RWQCB's comment letter, identified any state guidance or regulation that would warrant extending the lateral limits of waters of the State beyond the OHWM in this case.

With regard to the Live Oak Road Detention Basin, the RWQCB's comment letter states that the feature contains "riparian vegetation and habitat" and that further evaluation is necessary to confirm whether

this feature is a water of the State. As described in Rincon's Jurisdictional Delineation Report, the Live Oak Road Detention Basin does not exhibit an OHWM and does not meet the SWRCB's wetland definition. *See* DSEIR, Appendix 5.2d, p. 14. In Rincon's experience, features lacking these indicators generally are not regulated as waters of the State. In addition, delineating waters of the State based on habitat would be inconsistent with accepted practice and the statutory definition of waters of the State, which refers to "surface water or groundwater," not habitat or vegetation (Cal. Water Code Section 13050(e)). Therefore, Rincon's Jurisdictional Delineation Report did not delineate this feature as a water of the State.

Regarding the Old Road Agricultural Ditch, the RWQCB's comment letter states that the ditch was found to be not a water of the State because it lacks a relatively permanent flow, and further states that the ditch contains habitat and is a water of the State. Non-relatively-permanent flow was a reason for excluding the ditch from federal Clean Water Act jurisdiction but was not used to disclaim the ditch as a water of the State. Rincon's Jurisdictional Delineation Report stated, "The manmade ditch is assumed to be exempt from the [Procedures] per section IV.D.2.c.iv, which excludes artificially irrigated areas that would revert to dry land if irrigation were to cease." *See* DSEIR, Appendix 5.2d, p. 15. In other words, the Jurisdictional Delineation Report relied on an explicit exclusion from waters of the State codified in the Procedures. In addition, as noted above, it is not accepted practice to delineate waters of the State based on vegetation or habitat. Thus, the Jurisdictional Delineation Report did not delineate this feature as a water of the State.

Entrada South Planning Area

As described in the Rincon delineation and the DSEIR, the Entrada South Planning Area contains reaches of three natural streams (Unnamed Drainage 1, Unnamed Drainage 2 and Unnamed Drainage 3) and one man-made wetland located at the downstream end of Unnamed Drainage 3. DSEIR, pp. 5.2-52 – 5.2-56, Appendix 5.2c, pp. 8-15. Non-wetland waters of the United States within the three streams were delineated to the OHWM, and wetland waters of the United States were delineated according to the USACE's Wetland Delineation Manual. As described above, it is also accepted practice to delineate non-wetland waters of the State to the OHWM, for stream channels without adjacent wetlands. For wetlands, the state Procedures direct that wetland waters of the State be delineated in accordance with the USACE's Wetland Delineation Manual and applicable supplements, which Rincon did in this case. The Procedures also direct the Water Boards to accept any wetland delineation verified by the USACE, and, in this case, the USACE issued an Approved Jurisdictional Delineation verifying Rincon's delineation of wetland (and non-wetland) waters within the Entrada South Planning Area. DSEIR, Appendix 5.2c, p. A-18. Thus, the Entrada South Jurisdictional Delineation Report did not delineate waters of the State separately from waters of the United States, as there would have been no difference between the two types of jurisdiction. As stated in the DSEIR, all waters of the United States within the Entrada South Planning Area are also considered to be waters of the State. DSEIR p. 5.2-53.

The RWQCB's comment letter states that, for streams, the limits of waters of the State "generally extend beyond those of waters of the US" delineated using the OHWM. However, as stated above, the OHWM is typically used to delineate the lateral limits of waters of the State where adjacent wetlands are absent, and Rincon has not identified any state guidance or regulation that would warrant extending the lateral limits of waters of the State beyond the OHWM in this case, nor did the RWQCB's comment letter identify any such authority.

In summary, the delineation of waters of the State within the VCC Planning Area, and the reliance on the USACE-approved delineation of waters of the United States to identify waters of the State within the Entrada South Planning Area, were consistent with federal and state regulations, applicable guidance, accepted industry practice and best professional judgment. Recognizing that RWQCB

interpretations of jurisdictional limits may vary in some cases, the RWQCB's comment letter does not, in this case, identify any basis on which to delineate waters of the State within the VCC Planning Area or Entrada South Planning Area more broadly. Despite that, it is worth noting that the DSEIR's analysis of potential impacts to jurisdictional waters was not limited to those areas delineated as waters of the State. As described below, the Jurisdictional Delineation Reports and the DSEIR also identified and evaluated a broader set of jurisdictional waters subject to regulation by the California Department of Fish and Wildlife (CDFW), which would encompass any additional areas even arguably subject to regulation as waters of the State.

ADDITIONAL AREAS SUBJECT TO CDFW JURISDICTION

In addition to waters of the United States and waters of the State, as applicable, Rincon's Jurisdictional Delineation Reports for the Entrada South Planning Area and VCC Planning Area also delineated lakes and streambeds subject to the CDFW's jurisdiction under Section 1602 et seq. of the California Fish and Game Code, which governs alterations to such features. *See* DSEIR, pp. 5.2-52 – 5.2-61. In accordance with Section 1602 and longstanding CDFW practice, the lateral extent of CDFW-jurisdictional streambeds was delineated at the top of the physical bank or the outer edge of the riparian zone, whichever was broader. The boundaries delineated for CDFW's jurisdiction using this method are typically broader than the area delineated based on the OHWM, where applicable, and encompass all parts of the on-site stream systems. Thus, although the RWQCB's comment letter did not identify any delineation methods or alternative limits of waters of the State that the RWQCB believes would be appropriate in this case, any additional areas that might arguably be classified as potential waters of the State would presumptively fall within the boundaries of CDFW jurisdiction delineated in the Jurisdictional Delineation Reports. Project impacts to all such areas were analyzed in the DSEIR, and the project would provide compensatory mitigation for those impacts as described in the DSEIR. DSEIR, pp. 5.2-110 – 5.2-128.

For example, the Jurisdictional Delineation Report for Entrada South identified a total of 3.81 acres of waters of the United States within the Entrada South Planning Area, which are also waters of the State, and a total of 11.66 acres of CDFW-jurisdictional streambeds. DSEIR, p. 5.2-55. Figure 5.2-11 of the DSEIR shows that the CDFW-jurisdictional area is located within the same features as the waters of the United States but encompasses wider lateral limits. DSEIR, p. 5.2-54. Figure 5.2-16 of the DSEIR shows the project's impacts to this larger CDFW-jurisdictional area. DSEIR, p. 5.2-114.

Similarly, the Jurisdictional Delineation Report for VCC identified a total of 7.38 acres of waters of the State within the VCC Planning Area and a total of 113.22 acres of CDFW-jurisdictional streambeds. DSEIR, p. 5.2-59. Figure 5.2-12 of the DSEIR shows that the CDFW-jurisdictional area includes the features identified as waters of the State, Hasley Creek and Castaic Creek, but with broader lateral limits, and also includes the two additional features mentioned in the RWQCB's comment letter, the Live Oak Road Detention Basin and the Old Road Agricultural Ditch. DSEIR, p. 5.2-58. Figure 5.2-18 of the DSEIR shows the project's impacts to this larger CDFW-jurisdictional area. DSEIR, p. 5.2-122. The DSEIR found that all impacts to jurisdictional waters, including waters of the State and CDFW-jurisdictional streambeds, would be less than significant with application of mitigation measures identified in the DSEIR. DSEIR, p. 5.2-126.

In conclusion, the delineation of wetland and non-wetland waters of the State as contiguous with the boundaries of waters of the United States, within features subject to both state and federal jurisdiction, is consistent with applicable law, regulations and guidance, and with accepted professional practice in the Los Angeles region. Moreover, even if non-wetland waters of the State within the Entrada South and VCC Planning Areas were delineated more expansively, those waters would be expected to fall within the boundaries of CDFW-jurisdictional streambeds as delineated by Rincon, since the mapped

CDFW jurisdiction includes both the entire bed and banks of each stream channel and the adjacent upland areas supporting riparian vegetation, if present.

Sincerely,
Rincon Consultants, Inc.

Christopher Julian
Principal Regulatory Specialist

REFERENCES

Rincon Consultants, Inc. 2024. Valencia Commerce Center Development Project Jurisdictional Waters Technical Report, August 2024.

Rincon Consultants, Inc. 2023. Entrada South Development Project Jurisdictional Waters Technical Report, October 2023.

Rincon Consultants, Inc. 2024. Valencia Commerce Center Project Jurisdictional Delineation Report, February 2024.

Rincon Consultants, Inc. 2020. Entrada South Development Project Jurisdictional Delineation Report, February 2020.

State Water Resources Control Board (SWRCB). 2021. State Policy for Water Quality Control: State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State. Adopted April 2, 2019 and Revised April 6, 2021.

CHRISTOPHER JULIAN

Principal Regulatory Specialist

Mr. Julian has over 20 years of postgraduate work experience as an environmental consultant, technical specialist, and interdisciplinary project manager. His technical emphases include environmental analyses under NEPA and CEQA, comprehensive California and federal stream and wetlands permitting (including agency coordination and negotiations, aquatic resource delineations, wetlands functional assessment, and alternatives analysis, and mitigation planning), and endangered species permitting. He oversees teams executing environmental permitting and compliance tasks for clients including conventional and renewable energy developers, water and wastewater districts, electrical and natural gas utilities, residential developers, municipalities, and State and federal government. He has managed and prepared highly complex CEQA, NEPA, and ESA documents.

Additionally, Mr. Julian:

- Is a trained wetlands delineator and a Fully Trained California Rapid Assessment Method (CRAM) practitioner.
- Has managed and conducted reconnaissance- and protocol-level surveys for threatened and endangered plants and animals, including the California red-legged frog, tidewater goby, blunt-nosed leopard lizard, desert tortoise, and others.

EDUCATION

B.S., Aquatic Biology, UC Santa Barbara

TRAINING AND CERTIFICATIONS

Los Angeles County SEATAC Biologist

Wetlands Training Institute Delineation Training, 2004

Wetlands Training Institute Wetland Plant Identification Training

California Rapid Assessment Method (CRAM) Fully Trained Practitioner

Elkhorn Slough Foundation Blunt-Nosed Leopard Lizard Workshop

Elkhorn Slough Foundation California Red-Legged Frog Survey Training

Desert Tortoise Council Tortoise Survey Techniques Workshop

PROJECT EXPERIENCE

Principal in Charge – City of Santa Barbara – Las Positas/Modoc Multi-Use Path, Santa Barbara, California. Christopher oversaw a team of environmental professionals ensuring compliance during the construction of a Class I bicycle path in Santa Barbara's coastal zone. Negotiated final permits, including restoration and mitigation plans for protected trees and impacts to streams and sensitive habitats. Key concerns included jurisdictional waters, nesting birds, sensitive vegetation, special-status reptiles, cultural resources, and protected trees. The team maintained the project schedule by completing pre-activity surveys promptly to support construction progress.

Principal in Charge – City of Santa Barbara – Quinientos Street Bridge Replacement, Santa Barbara, California. Christopher oversaw a team of environmental professionals during the Quinientos Street bridge replacement over Sycamore Canyon Creek in Santa Barbara. Key concerns included jurisdictional waters, the threatened California red-legged frog, protected riparian trees, nesting birds, and water quality. The project achieved full compliance with environmental regulations, and Rincon's biologists successfully negotiated reduced monitoring costs as it neared completion. Ecological restoration continued for five years post-construction.

Permitting Lead – City of Goleta – Ekwill Street and Fowler Road Extensions Project EIR, Goleta, California. Prepared biological resources documentation, including a biological study, an EIR biology section, an aquatic resources delineation, and a Caltrans Natural Environment Study, for a series of transportation improvements in Goleta's Old Town. Prepared applications to the U.S. Army Corps of Engineers, the Central Coast Regional Water Quality Control Board, California Department of Fish and Wildlife, and the California Coastal Commission, with an accompanying Biological Assessment evaluating effects on the least Bell's vireo.

Permitting Lead – City of Goleta – Hollister Avenue Bridge Replacement Project, Goleta, California. Supervised preparation of all biological environmental documentation, including an aquatic resources delineation, necessary to support replacement of an aging concrete roadway bridge across San Jose Creek in Old Town Goleta, California. Documents prepared included a Natural Environment Study to Caltrans' specifications, a biological impacts analysis to satisfy CEQA (MND), and permit applications to the U.S Army Corps of Engineers, California Department of Fish and Wildlife, and Central Coast Regional Water Quality Control Board.

County of Santa Barbara – Santa Barbara Ranch Final EIR, Santa Barbara County, California. Oversaw biology-related elements of an EIR for a complex and highly controversial housing development near Goleta, California. Key biological issues of concern raised by the public included loss of native grasslands, loss of foraging habitat for the white-tailed kite, degradation of coastal streams and wetlands, and consistency with the policies of the California Coastal Act and Santa Barbara County Coastal Land Use Plan. Worked with County staff and counsel to address policy overlap scenarios.

Vandenberg Air Force Base - Environmental Assessment of Vandenberg Solar Project, Santa Barbara County, California. Managed preparation of an Environmental Assessment and associated materials evaluating the environmental effects of a proposed 30-megawatt photovoltaic generating facility on a federal Air Force Base as required by NEPA. Key environmental issues on the project included effects of construction-related noise and pollutant emissions on two adjacent schools, as well as potential injury/mortality of protected birds during project operations. Applicable federal mandates and Executive Orders, including those protecting floodplains and wetlands and prohibiting the spread of invasive species, were addressed in the Environmental Assessment.

Principal Regulatory Specialist – Chevron Environmental Management Company - Idle Pipeline Removal Project, Santa Barbara County, California. Oversaw preparation of multiple delineations of jurisdictional waters and wetlands supporting removal of approximately 30 idled oil and water pipeline segments in northern Santa Barbara County, California. Coordinated with regulatory agency personnel regarding appropriate permitting pathways for removing the pipelines efficiently. Oversaw preparation of regulatory permit application materials.

Principal Regulatory Specialist – Montecito Water District – Alder Flume Replacement Project, Santa Barbara County, California. Oversaw a team of biologists pursuing regulatory permits to facilitate replacement of the Alder Flume, a structure in the Los Padres National Forest that conveys diverted water from Alder Creek to Jameson Reservoir but was destroyed by fire in 2017. Mr. Julian's team conducted an aquatic resource delineation and biological surveys, and prepared applications to the USACE, RWQCB, and CDFW, as well as Section 7 and Section 106 materials for use by the U.S. Forest Service. Key issues for the project included water diversion for a planned in-stream access road, designated critical habitat for the California red-legged frog, and presence of California spotted owl habitat near the site.

QA/QC Lead, Southern California Gas Company – On-Call Environmental Services Program, Santa Barbara, Ventura, Los Angeles, Orange, Riverside, and San Bernardino Counties, California. Responsible for thought leadership, technical guidance, and quality assurance on all work products prepared under Rincon's muti-year environmental contracts with the Gas Company, including biological survey reports, aquatic resource delineations, regulatory permit application packages, and project environmental reviews and cost estimates conducted under the Pipeline Safety Enhancement Plan. Executed over 300 projects in total, ranging from initial planning efforts, to design and permitting, to construction.

QA/QC and Technical Advisor – Michael Baker International, Southern California Edison On-Call Aquatic Resources Delineation and Permitting – Santa Barbara, Ventura, Los Angeles, Orange, Riverside, and San Bernardino Counties, California. Provided oversight and thought leadership to biologists performing jurisdictional delineation and regulatory permitting services for a variety of Southern California Edison projects in Southern California. Some projects reviewed were highly controversial and included agency enforcement cases. Projects also included delineations in a broad variety of California's biological regions, including tidal wetlands, coastal streams, desert washes, montane rivers and streams, and high desert wetlands. Permit applications reviewed included Section 404/401/1600, as well as State Dredge/Fill applications and Coastal Development Permits.

QA/QC and Technical Advisor – United Water Conservation District – Freeman Diversion Renovation, Operation, and Maintenance Project, Ventura County, California. Provided quality assurance and guidance to biologists developing a multi-species Habitat Conservation Plan and related technical studies and regulatory permit application packages for renovation of the Freeman Diversion facility on the Santa Clara River. Deliverables included an aquatic resource

delineation, protocol survey reports for least Bell's vireo, a Multi-Species Habitat Conservation Plan, and regulatory permit application materials. The project was highly controversial, with deadlines for the regulatory permit applications and other submittals specified by a consent decree stemming from litigation over the facility's effects on Southern steelhead migration in the river.

Project Manager, Southern California Gas Company – Angeles National Forest Master Special Use Permit for O&M Activities – Los Angeles County, California. Oversaw a multi-disciplinary team preparing a Master Special Use Permit for the Angeles National Forest authorizing operations and maintenance activities along all Gas Company pipelines within the Forest. The application included an Operations and Maintenance Plan that described the covered activities and set forth a streamlined approach for communicating planned work to the Forest and obtaining coverage. Supporting documents included a Biological Assessment/Biological Evaluation, associated survey reports, a Heritage Resources Protection Plan for cultural resources, and an Erosion Control Plan, among others. The project included approval for non-lethal hazing of California condors.

Principal-in-Charge, Hydrostor, Inc. – Pecho A-CAES Energy Storage System, San Luis Obispo County, California. Oversaw a team of professionals preparing biological, cultural, and paleontological surveys and reports in support of an Application for Certification to the California Energy Commission for a compressed air energy storage project. The project was sited within the Coastal Zone. The project review included approximately 14 miles of alternative transmission line alignments. Surveys completed for the project included an aquatic resources delineation, focused botanical surveys, avian surveys, protocol California red-legged frog surveys, and surveys for steelhead and other fishes. All surveys and documents were prepared to meet the Energy Commission's regulatory standards, and were accepted by Commission staff with only minor comments.

Permitting Lead, WDG Capital Partners – Agincourt, Marathon, and Alamo Solar Projects, San Bernardino County, California. Supervised biological field surveys and reporting for three photovoltaic solar projects with a combined generating capacity of approximately 50 megawatts in unincorporated northwestern San Bernardino County, California. Christopher directed general biological site assessments, delineations of jurisdictional waters and streams, and protocol surveys for flowering plants, Mojave desert tortoise and burrowing owl. For each project, Christopher directed preparation of technical reports and a CEQA-adequate biological resources analysis for inclusion in the County's MND. Christopher coordinated with the project applicant, the County planner, and the California Department of Fish and Game to resolve issues related to the biological impacts and mitigation for the projects, and was able to resolve disagreements between these parties.

Biology Lead, NextLight/First Solar – AV Solar Ranch One Project, Los Angeles County, California. Chris managed preparation of the Biological Resources section of a Los Angeles County Department of Regional Planning EIR, with an accompanying Biota Report presenting the results of focused species surveys and an aquatic resources delineation, for a proposed PV solar generating facility in Antelope Valley, California. The project featured a gen-tie line connecting to the Whirlwind substation in adjacent Kern County. Chris was the primary author and responsible party for all biological resources documentation for the projects' CEQA and NEPA documents (Department of Energy EA). Key issues of concern included impacts to burrowing owls, loss of wildflower field habitat, loss of foraging habitat for sensitive grassland birds, and modifications to an existing ephemeral streambed within the site.

QA/QC and Technical Advisor, Southern California Edison – Del Valle 66/16 kV Substation Project, Los Angeles and Ventura Counties, California. Reviewed and advised on technical documentation related to biological and aquatic resources for a project involving the construction of a new 66/16 kV substation, reconductoring 66kV circuits between two existing substations, installation of fiber optic cables, select structure replacement, and related improvements. The project is sited in a sensitive environment and includes a crossing of the Santa Clara River, which is known to support threatened and endangered species. The technical studies included focused/protocol surveys for sensitive species as well as a comprehensive delineation of all streams and other aquatic resources along the alignment. The studies will be used in seeking incidental take coverage for protected species, as well as federal and state resource approvals under Sections 404/401/1600.

Principal-in-Charge, CONFIDENTIAL CLIENT – High Voltage Direct Current Cable Project, Los Angeles and Kern Counties, California. Led an expert team of land use planners, biologists, archaeologists, and hazardous materials specialists performing a siting analysis for a proposed high voltage, direct current (HVDC) electrical cable. The intent of the project was to connect excess renewable energy generating capacity in Kern County with load centers in the Los Angeles Basin, and the cable alignment included multiple constraints including dense urban lands, waterway, highway, and aqueduct crossings, County-designated Significant Ecological Areas, public lands, and endangered

species habitats. The siting analysis identified a preferred alignment that included minor deviations from the initially proposed route. Rincon supported the applicant in meetings with key stakeholders, including major federal landowners along the route and potential CEQA lead agencies. The project is currently commencing CEQA and NEPA review.

Principal in Charge, CONFIDENTIAL CLIENT – Environmental Critical Issues Assessments for Five Hydrogen Pipelines in Southern California, Nevada, and Utah. Oversaw a team evaluating environmental constraints associated with five potential pipelines conveying hydrogen gas from production centers to areas of demand in the southwestern United States. Constraints were evaluated at a desktop level using GIS, and each pipeline segment was considered in the context of land use compatibility, state/local permitting challenges (where not preempted), endangered species, waters and wetlands, FEMA floodplains, cultural resources, geologic stability, likely soil contamination, access logistics, and water availability for hydrogen production. The alignments considered totaled over 1,000 miles and included core transmission corridors as well as secondary spurs offering expanded service to additional industrial areas with high potential demand.

Permitting Lead, Coachella Valley Water District – Palm Desert Groundwater Replenishment Facility Phase II, Riverside County, California. Oversaw the Section 404 Individual Permit process for a project seeking to construct berms within the Whitewater River Stormwater Channel to infiltrate imported Colorado River water at a strategic location that would improve reliability of groundwater supplies while also alleviating local subsidence problems. Mr. Julian's team prepared all application materials and supplements, including an aquatic resources delineation CRAM assessment, Streamflow Duration Assessment, Compensatory Mitigation Plan, and Section 404(b)(1) Alternatives Analysis. Key issues for the project included losses of waters of the United States due to type conversion (flooding) and identifying appropriate and proportional mitigation for this type of impact.

Contract Biologist, City of Malibu – On-call Biological Services, Los Angeles County, California. Reviewed biological submittals from applicants proposing projects in the City, including Biological Inventories, Biological Assessments, aquatic resource delineations, and landscape plans, for conformance with the City's LCP and Local Implementation Plan. Conducted site inspections to corroborate report findings, and met with City staff and applicants to identify feasible resource avoidance and minimization options. Confirmed mapping of Environmentally Sensitive Habitat Areas (ESHA) and calculated impact acreages, evaluating consistency with LCP limitations on encroachment of development and fuel modification zones into ESHA. Calculated water allocations for landscape plantings to confirm compliance with the City's Landscape Water Conservation Ordinance. Evaluated viewsheds to determine whether proposed development would affect protected views.

Program Manager – Southern California Gas Company – Line 8109 Pipeline Emergency Repair Project, Ventura County, California. Oversaw a team executing permitting and construction-phase compliance during emergency repair of a leaking natural gas transmission pipeline buried beneath the Ventura River. Prepared an aquatic resources delineation and biological summary report to accompany emergency permit notifications. Key issues for the project included an extensive water diversion, capturing and relocating native aquatic species, and minimizing effects on California red-legged frog, which were encountered in the construction footprint. Mr. Julian facilitated regulatory agency conversations and in-field negotiations regarding feasible avoidance measures.

Principal in Charge – Casitas Municipal Water District – Robles Dam and Diversion Facility Operations and Maintenance Permitting, Ventura County, California. Guided a multi-disciplinary team of permitting professionals securing programmatic permits for operation and maintenance of the Robles Dam and Diversion Facility on the Ventura River. Field studies performed for the project included an aquatic resources delineation, vegetation mapping, and focused surveys for riparian birds (least Bell's vireo, southwestern willow flycatcher) and aquatic species (steelhead, California red-legged frog). The project included 404/401/1600 permits, including associated technical studies, Section 7 and Section 106 consultations, and CEQA and NEPA review. The project was subject to oversight by the U.S. Bureau of Reclamation, and was intended to streamline the multiple permits required so that maintenance and repairs could be conducted timely and the diversion could operate at design capacity.

QA/QC and Technical Advisor – Casitas Municipal Water District – Robles Dam Forebay Restoration Project, Ventura County, California. Guided a multi-disciplinary team of permitting professionals undertaking a time-sensitive effort to securing regulatory permits to allow sediment and vegetation removal in the forebay upstream of the Robles Diversion on the Ventura River. The project was necessary to enable proper function of the Robles Diversion, and involved mechanical movement of sediment out of the forebay and deposition in the river channel downstream. Affected agencies included the U.S. Bureau of Reclamation, USACE, CDFW, RWQCB, USFWS, and

NMFS. Field studies performed for the project included an aquatic resources delineation, vegetation mapping, and focused surveys for steelhead and California red-legged frog. Key issues for the project included activities in flowing water within Southern steelhead critical habitat and removal of vegetation that could be used for nesting or foraging by the least Bell's vireo.

Principal in Charge, Andora Properties, LLC – Andora Subdivision Project – Los Angeles County, California. Oversaw a team of biologists preparing aquatic resources permit applications and an application to CDFW for incidental take of the Santa Susana tarplant. Deliverables included an aquatic resources delineation, CRAM assessment, tree inventory, Property Analysis Record, and Long-term Management Plan for mitigation areas. Rincon was instrumental in negotiating the terms of the permits, and in aligning disparate viewpoints regarding mitigation ratios and endowment costs.

Herpetology Lead, SoCalGas – Coastal Region Conservation Plan, San Luis Obispo, Santa Barbara, Ventura, Los Angeles, and San Bernardino Counties, California. Lead reptile/amphibian analyst and document preparer on a multi-county Habitat Conservation Plan and Incidental Take Permit applications (federal and California) for natural gas pipeline operation and maintenance activities in coastal Southern California. Key species addressed included the California red-legged frog, California tiger salamander, Southern Mountain yellow-legged frog, arroyo toad, and southern western pond turtle.

Principal in Charge, SoCalGas - PSEP Line 36-37 Section 11 and Section 12 Projects, Ventura County, California. Prepared two Detailed Environmental Review documents in support of SoCalGas' cost estimate for testing or replacement of two sections of an existing gas pipeline, consistent with the Pipeline Safety Enhancement Plan and state mandates. Section 11 was situated in an urban area (downtown Ventura), where key issues included numerous hazardous materials cleanup sites along the pipeline alignment. Section 12 traversed a combination of urban, residential, agricultural, and undeveloped lands. Key issues for this section included known cultural resources, hazardous materials sites, jurisdictional waters, and proximity to sensitive receptors such as schools and homes.

Principal in Charge, SoCalGas - PSEP Line 36-1001/45-1001 Project, Los Angeles and Ventura Counties, California. Prepared High-Level Review and Detailed Environmental Review documents in support of SoCalGas' cost estimate for testing or replacement of an existing gas pipeline, consistent with the Pipeline Safety Enhancement Plan and state mandates. Key issues for the project included impacts to oak trees, endangered plants, critical habitat for riparian birds, known cultural resources, and compatibility with a master-planned development that had been approved, though not yet constructed, on the pipeline site.

Project Manager, Plains All-American Pipeline – Angeles National Forest Master Special Use Permit for O&M Activities – Los Angeles County, California. Managed a diverse team of biologists and archaeologists preparing a Master Special Use Permit application and supporting studies for the Angeles National Forest authorizing operations and maintenance activities along two major crude oil transmission lines extending from coastal Los Angeles County into southern Kern County. The permit was intended to provide a streamlined, consolidated approach to the increasingly onerous process of obtaining permission to conduct external inspections and repairs of the underground pipelines. Key issues for the project included protection of Heritage Resources, including the Old Ridge Route, and restoration of impacted sites.

Principal in Charge, Plains All-American Pipeline – Line 2000 and Line 63 Anomaly Repairs and Restoration – Los Angeles County, California. Over an 8-year period, oversaw multi-disciplinary teams of planners, biologists, and archaeologists executing environmental permitting and compliance in support of annual operations and maintenance activities along two crude oil pipelines traversing the Angeles National Forest (ANF). Prepared Special Use Permit applications and negotiated terms and conditions with the ANF's Special Use Permit Officer and District Ranger. Prepared supplemental documents including Habitat Restoration and Revegetation Plans (HRRP), Transportation Plans, and plans for protection of the Old Ridge Route, a historic road through the ANF. Worked with ANF technical specialists (Forest Botanist, Heritage Resources staff) to secure approvals. During project implementation, Mr. Julian's team provided biological and cultural resource monitors and oversaw compliance with permit conditions. Following each year's project completion, the team's restoration ecologist directed contactors in restoring work sites to pre-existing contours and restoring the areas with native vegetation. Each site was maintained monitored for a 10-year period, consistent with ANF requirements, but some sites were completed early due to success criteria being met ahead of schedule.

Field Lead, Hydrogen Energy California – Hydrogen Energy California Project, Kern County, California. Assisted client with environmental constraints associated with installation of a large-diameter hydrogen supply line for an experimental utility-scale hydrogen energy generating facility. Key issues of concern included playa wetlands, blunt-nosed leopard lizard presence. Mr. Julian conducted field delineations and protocol surveys for these resources, and the pipeline alignment was adjusted where feasible to minimize impacts.

Project Manager, Santa Maria Energy – Careaga Lease Oil Drilling and Production Plan Environmental Compliance, Santa Barbara County, California. Mr. Julian oversaw a team of environmental professionals preparing compliance documentation to support construction of a 136-well enhanced oil recovery project in northern Santa Barbara County. For the biological portion of the project, all applicable permit conditions from the County, responsible agencies, and federal approvers were consolidated into a Biological Resources Mitigation Compliance Plan which outlined specific procedures to comply with each applicable measure. Other documents prepared included an Oak Tree Mitigation Program, Restoration Plan, and Relocation Plans for listed species including the California tiger salamander and California red-legged frog.

Permitting Lead, Freeport McMoRan Oil and Gas - Hyla Crossing Replacement Project, San Luis Obispo County, California. Prepared a biological report, aquatic resources delineation, and emergency permitting and Section 7 consultation materials authorizing repair of a damaged culvert road crossing on Pismo Creek in San Luis Obispo County, California, and oversaw environmental protections during construction. Captured and relocated sensitive aquatic species, including two adult South-Central California Coast steelhead, out of harm's way. Methods included electrofishing, seining, and dip netting.

Project Manager, Newhall Land and Farming Company – Mission Village Development Project, Los Angeles County, California. Supervised delineation and condition assessment of jurisdictional waters and streambeds for a 1,260-acre master-planned community in northern Los Angeles County. All features within the site were delineated and assessed using the California Rapid Assessment Method (CRAM); features assessed included perennial, intermittent, and ephemeral streams and one wetland. The proposed development activities were included within master Section 404 permits and Streambed Alteration Agreements previously acquired by the landowner, and Christopher prepared a report substantiating current extent and condition of on-site aquatic resources as required by the prior permits.

Project Manager, Newhall Land and Farming Company – Legacy Development Project, Los Angeles County, California. Supervised delineation and condition assessment of jurisdictional waters and streambeds within a 1,730-acre site in the upper Santa Clara River watershed under consideration for residential development. All features within the site were delineated per federal and state guidelines and assessed using the California Rapid Assessment Method (CRAM); features assessed included perennial, intermittent, and ephemeral streams and several adjacent wetlands.

Principal in Charge, Pre-Con Products Property Expansion Project, Simi Valley, California. Managed resource agency permitting to support expansion and upgrading of a concrete products facility, including isolation of the project site from receiving waters such that coverage under the Industrial General Permit would no longer be required. The project included undergrounding of a tributary to Arroyo Simi, and Mr. Julian secured all required approvals from the USACE, Los Angeles RWQCB, and CDFW. He also oversaw associated technical work products, including a Biological Resources Assessment, aquatic resources delineation, CRAM assessment, and Cultural Resources study. Wildlife movement was a key concern for the project, because the tributary had served as a conduit between habitat areas and the Arroyo Simi, and Mr. Julian worked with CDFW representatives to reach a compromise and create an alternate movement route. The project was approved by all agencies in 2018.

Field Lead, California High Speed Rail Authority - California High Speed Train, Fresno-Bakersfield and Bakersfield-Palmdale Segments, Los Angeles, Kern, Kings, and Tulare Counties, California. Worked with and oversaw a crew of wetland scientists delineating all waters of the U.S., including wetlands, and CDFW-jurisdictional streambeds located along several alternative proposed high-speed rail alignments between Fresno and Bakersfield in California's Central Valley and between Bakersfield and Palmdale in the Tehachapi Mountains and Mojave Desert. All jurisdictional features were delineated in the field using a GPS unit capable of sub-meter accuracy, and the study conformed to the latest regulatory guidance, including the Arid West Regional Supplement to the Wetland Delineation Manual, and the Corps/USEPA's joint Rapanos Guidance Memorandum.

Permitting Advisor, Los Angeles Mission College - Los Angeles Mission College Athletic Fields Project, Los Angeles County, California. Prepared and submitted permit application materials to the U.S. Army Corps of Engineers, the Los Angeles Regional Water Quality Control Board, and the California Department of Fish and Game in support of bank stabilization and storm drain outlets associated with expanding a collegiate athletics complex. Key issues on the project included presence of least Bell's vireo and in-stream sediment management, as well as the nature and extent of mitigation.

Task Lead, Marine Corps Base Camp Pendleton - Infrastructure Improvement Projects, San Diego County, California. Was responsible for senior technical review of permit applications and supporting materials, including an aquatic resources delineation and Compensatory Mitigation Plan, submitted to the U.S. Army Corps of Engineers and San Diego Regional Water Quality Control Board for two projects (P-1093 and P-1094) seeking to improve aging electrical, telecommunications, water, wastewater, and natural gas distribution infrastructure within Marine Corps Base Camp Pendleton in San Diego County, California. Key issues on the project included presence of listed species, including spreading navarretia, San Diego button celery, least Bell's vireo, southwestern willow flycatcher, tidewater goby, arroyo toad, California gnatcatcher, yellow-billed cuckoo, and two listed fairy shrimp taxa.

Project Manager, Chevron Environmental Management Company - Ellwood Pump Station Removal Project, Kern County, California. Prepared and submitted permit applications to the California Department of Fish and Game seeking authorization to remove an abandoned pump station structure from the bank of the Kern River in Kern County, California. The application included an aquatic resources delineation and biological study. Key issues on the project included avoidance of sensitive resources, including riparian vegetation, as well as safety concerns due to the site's location in an active oil field. Because the project was designed to avoid the need for grading and placement of fill material, a letter to the U.S. Army Corps of Engineers was composed, informing the Corps of the project and seeking concurrence with the opinion that a Section 404 Permit would not be required.

Delineation Lead, SolEI – Johnson Valley Solar Project, San Bernardino County, California. Delineated waters of the United States and CDFW-jurisdictional streambeds on a large desert property being considered for utility-scale solar development. Resources delineated included desert washes, including mapping of alluvial fans and desert wash woodland.

Delineation Lead, SunEdison – Oro Verde Solar Project, Edwards Air Force Base, Kern County, California. Delineated waters of the United States and CDFW-jurisdictional streambeds on a portion of Edwards Air Force Base being considered for utility-scale solar development through an Enhanced Use Lease. In addition to the site, the delineation included over 100 miles of gen-tie route options. Resources mapped included desert washes, alluvial fans, and manmade drainage features and basins.

Delineation Lead, California Department of Parks and Recreation – Gaviota Creek Culvert Replacement, Santa Barbara County, California. Delineated waters of the United States, coastal wetlands, and CDFW-jurisdictional streambeds within a reach of Gaviota Creek near a damaged culvert that was proposed for replacement. Resources delineated included a perennial coastal stream with adjacent wetlands in the riparian zone.

Delineation Lead, Ventura County Watershed Protection District – Piru Creek Bank Protection Project, Ventura County, California. Delineated waters of the United States, waters of the State, and CDFW-jurisdictional streambeds along a portion of Piru Creek where installation of flood protection was proposed. Delineated resources included a reach of Piru Creek, an intermittent stream with hydrology interrupted by an upstream dam.

Team Lead, SunPower – California Valley Solar Ranch, San Luis Obispo County, California. Led teams of field biologists and delineators conducting comprehensive surveys within a 3,400-acre property proposed for utility-scale solar development. Activities included protocol surveys for the blunt-nosed leopard lizard, protocol surveys for the burrowing owl, focused botanical surveys, and an aquatic resources delineation. Features delineated on the site included multiple ephemeral and intermittent streams, as well as seep wetlands.

Team Lead, California High Speed Rail Authority - California High Speed Train, Fresno-Bakersfield Segment, Kern, Kings, and Tulare Counties, California. Assessed the condition of jurisdictional waters, including wetlands, along several alternative high-speed rail alignments between Fresno and Bakersfield in California's Central Valley using the California Rapid Assessment Method (CRAM). The aquatic features assessed included individual vernal pools, vernal pool complexes, and depressional wetlands located on the floor of the Central Valley, as well as riverine wetlands along the Kings River and Poso Creek. A certified CRAM instructor supervised the assessment.

Project Manager, Freeport McMoRan Oil and Gas - Point Pedernales Pipeline Programmatic O&M Permitting, Vandenberg Air Force Base, California. Oversaw preparation of environmental operations and maintenance procedures for the onshore portion of Point Pedernales Pipeline to support programmatic permitting by Vandenberg Air Force Base. Orchestrated biological surveys along the alignment for species including the federally listed California red-legged frog, southwestern willow flycatcher, and El Segundo blue butterfly, as well as a delineation of jurisdictional waters. Facilitated meetings with the pipeline operator, Vandenberg staff, and the U.S. Fish and Wildlife Service to negotiate appropriate levels of resource protection during various types of O&M activities, and established an approach and timeline for Section 7 consultation. Evaluated project impacts, and made a case for categorical exclusion from NEPA review.

Project Manager, Newhall Land and Farming Company - Newhall Ranch Resource Management and Development Plan, Los Angeles County, California. Managed delineation of all Corps-jurisdictional waters of the U.S., including wetlands, and CDFG-jurisdictional streambeds within the 12,000 acre Newhall Ranch site in the Santa Clarita Valley, California. All jurisdictional features were delineated in the field using a GPS unit capable of sub-meter accuracy, and nearly 100 wetland delineation data forms were completed. The results of the delineation were provided to the Corps and CDFG, and both agencies concurred with the delineated boundaries, which were utilized as the environmental baseline during environmental analysis of comprehensive permitting proposals on the site. Mr. Julian also prepared an alternatives analysis, performed pursuant to the EPA's Section 404(b)(1) Guidelines, determining the Least Environmentally Damaging Practicable Alternative for the project. The analysis used the seven alternatives evaluated in the EIS/EIR as a starting point, and undertook a finer-scale evaluation to ascertain which alternative would be least damaging to the aquatic ecosystem in the project area's several sub-watersheds. All factors required by the 404(b)(1) Guidelines were considered, including those required by NEPA and CEQA and those unique to the Clean Water Act permitting process. Ultimately, an alternative was selected that was very similar to one of the alternatives evaluated in the EIS/EIR, but that contained minor modifications to further reduce impacts while practicably achieving the overall project purpose.

Field Lead, Tessera Solar North America - Calico Solar Project, San Bernardino County, California. Performed protocol-level Mojave desert tortoise surveys on a 8,230-acre proposed concentrated solar power site and 23,000-acre tortoise relocation area in the Mojave Desert near Yucca, California. Personally documented presence of over 30 adult and sub-adult tortoises, as well as active burrows, palates, carcasses, tracks, and scat.

Field Lead, BrightSource Energy - Rio Mesa Solar Project, Riverside County, California. Performed biological field surveys for a proposed approximately 4,000-acre solar thermal generating site in the Sonoran/Colorado Desert near Blythe, California and along an associated 10-mile electrical transmission line. Investigations included full-coverage, protocol-level surveys for the Mojave desert tortoise, as well as surveys for the Mojave fringe-toed lizards using a customized survey protocol. Two desert tortoises and numerous fringe-toed lizards were observed during the surveys.

Field Lead, California High Speed Rail Authority - California High Speed Train Project, Kern County, California. Provided supervision and guidance during protocol surveys for Mojave desert tortoise within suitable habitat along a proposed high-speed rail alignment between the Tehachapi foothills and Rosamond in Kern County, California. Survey results were negative.

Biological Resources Lead, Freeport McMoRan Oil and Gas - Phase V Expansion of the Arroyo Grande Oil Field, San Luis Obispo County, California. Oversaw comprehensive biological field surveys and associated reporting associated with expansion of an oil field near Arroyo Grande, California. Field efforts performed included full-coverage floristic surveys for terrestrial and aquatic plants, distributed point count surveys for passerine birds, focused raptor surveys, protocol surveys for California red-legged frogs, and a delineation of jurisdictional waters. Key biological issues on the project included presence of steelhead trout, red-legged frogs, and Pismo clarkia, as well as oak woodlands and jurisdictional waters. The Biological Resources Assessment Report for the project was prepared in accordance with San Luis Obispo County guidelines, and included impacts analysis consistent with requirements for environmental review under CEQA.

Biological Resources Lead, Freeport McMoRan Oil and Gas - Arroyo Grande Oil Field Thermal Oxidizer Project, San Luis Obispo County, California. Managed field investigations and biological resources reporting associated with adding a thermal oxidizer to an oil field near Arroyo Grande, California. The thermal oxidizer was needed to facilitate disposal of sour gas, thereby allowing an increase in production. A Biological Resources Assessment Report for the project was prepared in accordance with San Luis Obispo County guidelines, and included focused

species surveys, an aquatic resources delineation, and impacts analysis consistent with the County's requirements for environmental review under CEQA.

Permitting Lead - WDG Capital Partners - Agincourt, Marathon, and Alamo Solar Projects, San Bernardino County, California. Supervised biological field surveys, aquatic resources delineation, and associated reporting for three photovoltaic solar projects with a combined generating capacity of approximately 50 megawatts in unincorporated northwestern San Bernardino County, California. Though separate projects, the facilities were proposed by a single applicant around the same time, and Mitigated Negative Declarations for the projects were prepared concurrently. For each project, Mr. Julian directed general biological site assessments, delineations of jurisdictional waters and streams, and protocol surveys for flowering plants, Mojave desert tortoise and burrowing owl. In addition, an inventory of Joshua trees and plants protected by the California Desert Native Plants Act was conducted to maintain compliance with this statute and applicable provisions of the San Bernardino County Development Code. Separate reports for each of these resources were prepared, in accordance with the County's biological reporting guidelines. For each project, Mr. Julian directed preparation of a CEQA-adequate biological resources analysis for inclusion in the County's MND. Mr. Julian coordinated with the project applicant, the County planner, and the California Department of Fish and Game to resolve issues related to the biological impacts and mitigation for the projects, and was able to resolve disagreements between these parties.

Natural Resources Lead - First Solar - Fort Mojave Solar Project, Fort Mojave Indian Reservation, California, Nevada, and Arizona. Planned, supervised, and conducted biological field surveys within two proposed solar project sites totaling approximately 4,200 acres and along 20 miles of potential transmission line alignments in San Bernardino County, California, Clark County, Nevada, and Mohave County, Arizona, and on the Fort Mojave (Aha Macav) Indian Reservation. Attended meetings with federal, state, and tribal agency representatives to identify a scope of biological investigations adequate to support defensible NEPA documentation for the facility and prepared a Biological Resources Work Plan documenting the agreed upon surveys and methods. Biological field investigations conducted for the project included vegetation mapping, protocol-level surveys for the Mojave desert tortoise (Nevada and California) and Morafka's desert tortoise (Arizona), protocol-level surveys for the burrowing owl, protocol-level floristic surveys, surveys for nesting and wintering birds, and a delineation of jurisdictional waters and streambeds.

Project Manager, E.ON Climate and Renewables - Critical Issues Assessment of Gateway Solar Project Site, Kern County, California. Supervised and conducted a desktop investigation and subsequent protocol-level Mojave desert tortoise surveys within an approximately 3,000-acre proposed solar project site in southern Kern County, California. Numerous live adult and subadult tortoises and their sign were detected; other constraints included jurisdictional streambeds, and potential for the Mohave ground squirrel and burrowing owl to occur. Mr. Julian worked with the project proponent and representatives of the U.S. Fish and Wildlife Service to identify take avoidance measures and available permitting pathways for the project.

Biological Resources Lead, First Solar – Northstar Solar Project, Fresno County, California. Conducted an assessment of project impacts to the Swainson's hawk and prepared a proposed mitigation strategy that considered the relative value of impacted lands and proposed mitigation lands to justify a reasonable mitigation ratio. The strategy was presented to CDFW for approval, and was a key component of the final, agency accepted mitigation program.

Biological Resources Lead, NextLight, Inc. - Borrego Springs Solar Site, San Diego County, California. Conducted a two-day field assessment of a property near Borrego Springs, California to identify any biological constraints that would preclude or inhibit use of the site for solar energy generation. The field assessment included vegetation mapping, habitat suitability analysis for special-status species including desert tortoise and bighorn sheep, inspection of potentially-jurisdictional drainages, and non-protocol pedestrian surveys for rare or sensitive plants or wildlife species. Results of the assessment were presented in a letter report, which combined the field data with information from other sources to determine the extent to which the biological constraints would affect the viability of the site.

Project Manager, Natural Resources Group - Critical Issues Assessment of Windhub Peaker Project Site, Kern County, California. Supervised and conducted desktop research and a reconnaissance-level field assessment of an 80-acre site in unincorporated Kern County to identify the likelihood for biological resources to pose potential constraints to development of the site. Constraints identified included Joshua tree woodland habitat, jurisdictional streambeds, and potential for desert tortoise and Mohave ground squirrel to occur.

Biological Resources Lead, NextLight, Inc. - Due Diligence Analysis of Grayburn Solar Site, Kern County, California. Conducted a one-day field assessment of a small property north of Mojave, California to identify any biological constraints that would preclude or inhibit use of the site for solar energy generation. The field assessment included an evaluation of onsite vegetation, habitat suitability analysis for the desert tortoise, which was present in the region, inspection of potentially jurisdictional drainages, and pedestrian surveys for rare or sensitive plants or wildlife species. Results of the assessment were presented in a letter report, which combined the field data with information from other sources to determine the extent to which the biological constraints would affect the viability of the site.

Project Manager, City of Goleta - Los Carneros Road Overhead Bridge Replacement Project, Goleta, California. Prepared biological resources documentation in support of a project to replace an existing railroad overhead that was structurally deficient due to the presence of reactive aggregate. Mr. Julian prepared the biological resource section of the City's Mitigated Negative Declaration for the project, as well as a Natural Environment Study (Minimal Impacts) to comply with Caltrans requirements.

QA/QC Lead, Ventura County Watershed Protection District – Flood Control Maintenance Program EIR, Ventura County, California. Responsible for cover-to-cover senior technical review of a Program EIR prepared in support of an updated flood control manual for the Ventura County Watershed Protection District. The project included preparing a comprehensive inventory of the District's flood control facilities, and identifying requirements relative to biological, cultural, and other resources that would apply to maintenance of each facility. The intent of the project was to facilitate comprehensive federal and state permitting for impacts to jurisdictional waters that would occur during maintenance activities.

Program Manager, Vandenberg Air Force Base – 10-Year Vegetation Fuels Plan, Santa Barbara County, California. Directed preparation of an Environmental Assessment evaluating the environmental effects of a long-term, comprehensive wildfire management plan. The proposed project included a variety of treatment methods, including controlled burning, mastication, and herbicide application, and would treat a total area exceeding 2,000 acres over a an estimated 10-year period. Key issues of concern for the project included air quality impacts associated with burning, effects on listed species, and cultural resources.

Project Manager, Ojai Valley Sanitary District - Ventura River Algae Inventory Study, Ventura County, California. Supervised a crew of four aquatic biologists in a long-term study of algal distribution and abundance in the Ventura River. The project has been ongoing since 2004, and includes monthly surveys at a suite of sample sites along the lower river both upstream and downstream of the Ojai Valley Sanitary District's wastewater treatment plant outfall. Many physical, chemical, and biological factors are measured at each site, including algal cover, irradiance, streamflow, nutrient concentrations, and abundance of grazers, in an attempt to discern the factors controlling algal distribution and abundance in the river.

Project Manager, Freeport McMoRan Oil and Gas - Point Pedernales Pipeline Biological Surveys, Santa Barbara County, California. Oversaw a team of ten field biologists and subcontractors performing focused surveys for Vandenberg monkeyflower and El Segundo blue butterfly along a pipeline corridor extending from the coast through Vandenberg Air Force Base to an oil processing facility near Lompoc, California. Butterfly surveys included mapping of the host plant Eriogonum parviflorum with high-accuracy GPS, as well as surveys for adult butterflies during the flight season. Oversaw preparation of a technical report presenting the survey results to regulatory agencies, and worked with multiple jurisdictions to identify ways to allow ongoing pipeline maintenance activities to occur in compliance with the Endangered Species Act.

Project Manager, City of Goleta - Lake Los Carneros Limnology Study, Santa Barbara County, California. Oversaw a team of biologists conducting monthly assessments of the overall health of Lake Los Carneros, a manmade catchment, during drought conditions. Physical and chemical characteristics were evaluated in an attempt to establish a body of baseline environmental information that could be used to track trends over time. Provided recommendations to the City of Goleta regarding possible options intended to maintain water levels, improve water quality, and enhance the lake ecosystem.

Biology Lead, City of Santa Barbara - Redevelopment Parcel Biological Resources Report, Santa Barbara County, California. Managed all aspects of preparing a report to the City of Santa Barbara Redevelopment Agency assessing biological resources within an area that the agency had proposed for redevelopment.

Biological Resources Lead, SunEdison - Antelope Solar Farm Project, Los Angeles County, California. Assumed the lead biological technical role on a 20 MW photovoltaic solar project in the Antelope Valley, in the west Mojave Desert. Conducted meetings and negotiations with regulatory agencies, and directed all biological field survey efforts and associated documentation. Field efforts included an aquatic resources delineation and protocol-level surveys for Swainson's hawks, burrowing owls, and rare plants, as well as nesting and wintering bird surveys and general wildlife surveys.

Principal in Charge – Montecito Water District – Juncal Pipeline Emergency Repair at Fox Creek, Santa Barbara County, California. In response to severe storms in January 2023, Mr. Julian led a team of biologists, archaeologists, and stormwater professionals facilitating replacement of the Juncal pipeline, a critical piece of water delivery infrastructure that was exposed and severely damaged during the storms. Services included preparing emergency notifications to the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, and also negotiating a Temporary Use Permit from the Los Padres National Forest. Biological and archaeological surveys were conducted, and the project's limits were adjusted to avoid sensitive resources. During construction, Mr. Julian's team provided biological, archaeological, and stormwater monitoring services to ensure that the project did not adversely impact the Santa Ynez River, which supports the California red-legged frog and arroyo toad in this region. Nesting bird surveys and monitoring were also performed, as this time-sensitive repair was conducted during the peak of the nesting season.

Principal Regulatory Specialist – Montecito Water District – Reservoir Retrofits Project, Santa Barbara County, California. Oversaw biological elements of a comprehensive review of proposed reservoir retrofits in and around the community of Montecito in Santa Barbara County. The intent was to confirm whether a CEQA Categorical Exemption would be appropriate for the proposed work, or if circulation of a CEQA document was needed. Key factors in the analysis included proximity to streambeds and presence of protected oak trees near the reservoir sites and along access roads.

Principal Biologist – New Urban West – Metro Walk Specific Plan, Los Angeles County, California. Oversaw a team of biologists performing site surveys and technical analysis to support master-planned residential development on a 20-acre parcel in the City of Santa Clarita. The site was adjacent to the Santa Clara River, and in the Santa Clara River Significant Ecological Area. Key issues included compatibility with siting near the river, presence of sensitive big sagebrush scrub habitat, potential for coastal California gnatcatcher to occur, and concern for nesting birds. Rincon's Biological Resource Assessment for the project was independently peer-reviewed by the City's consultant, and was accepted with only minor revisions.

Principal In Charge – City of Santa Barbara – Quinientos Street Bridge Replacement, Santa Barbara County, California. Oversaw a team of environmental professionals ensuring compliance with mitigation measures and permit conditions during replacement of the Quinientos Street bridge over Sycamore Canyon Creek in Santa Barbara. Key resources of concern on the project included the threatened California red-legged frog, protected riparian trees, nesting birds, and water quality. The project was completed without environmental non-compliance, and Rincon's biologists were instrumental in negotiating reduced monitoring intensity to save costs as the project neared completion.

Principal In Charge – City of Santa Barbara – Las Positas/Modoc Multi-Use Pathway, Santa Barbara County, California. Oversaw a team of environmental professionals working to ensure environmental compliance during construction of a Class I bicycle path in the City of Santa Barbara's coastal zone. Rincon negotiated final permit terms on the project, which included final restoration and mitigation plans for protected trees and impacts to streams and riparian Environmentally Sensitive Habitat Areas. Key resources of concern on the project included nesting birds and raptors, sensitive vegetation, special-status reptile species, cultural resources, and protected trees. Rincon's team kept the project on schedule by ensuring that pre-activity surveys were completed timely to support the pace of construction.

Principal in Charge, City of Goleta – Ellwood Mesa Monarch Butterfly Habitat Management. Supervised a team of biologists preparing a habitat management plan for Ellwood Mesa, a 500-acre open space area in the City of Goleta's coastal zone. Mr. Julian oversaw preparation of the plan as well as associated CEQA documentation, and secured Coastal Development Permits from the California Coastal Commission for maintenance and habitat enhancement projects performed under the plan. The majority of the projects involved impacts to Environmentally Sensitive Habitat. Mr. Julian also engaged with City and CCC staff regarding a programmatic framework for Coastal Development Permits at the site, which would reduce permitting delays for maintenance activities and lessen the

need for emergency permits which were becoming common at the site. Mr. Julian also facilitated authorization of certain activities under Coastal Act de minimis waivers and emergency permits.

Principal in Charge, City of Goleta – Bacara Coastal Access Easement Support. Worked with City executives and legal counsel to evaluate a proposed coastal access easement alignment offered by a resort hotel to meet Coastal Development Permit requirements. Key issues included alignment between the proposed easement location and existing coastal access routes, presence of Environmentally Sensitive Habitat Areas, cultural resource sites, and the potential for hazardous materials within the offered easement from the site's prior use as a landing and processing location for offshore crude oil.

Principal in Charge, Southern California Gas Company – Sullivan Canyon Operations and Maintenance Permitting, Los Angeles County, California. Oversaw biologists preparing aquatic resources permit applications for long-term maintenance of a natural gas transmission pipeline and associated appurtenances along Sullivan Canyon Creek in the City of Los Angeles. The approvals included an Individual Section 404 Permit, associated Section 401 Certification, and a Streambed Alteration Agreement for routine maintenance. Key issues included the presence of least Bell's vireo in the area and developing a mitigation accounting framework for a project that could result in repeated impacts to the same locations over the life of the extended permit.

Principal in Charge, Santa Clarita Valley Water District – Honby Pipeline Replacement Project, Los Angeles County, California. Oversaw biologists preparing aquatic resources permit applications for replacement of a major water supply pipeline crossing the Santa Clara River in the Santa Clarita Valley. The team prepared applications for Clean Water Act Section 404 and 401 coverage, and a Streambed Alteration Agreement. An alternatives analysis and compensatory mitigation plan accompanied the applications, as required by the Regional Water Quality Control Board.

Principal in Charge, Goleta Water District – Pipeline Blowoff Replacement Program, Santa Barbara County, California. Oversaw a multi-disciplinary team supporting the District's replacement of several pipeline blowoff valve outlets in coastal streams in and around the city of Goleta. Each project included an aquatic resources delineation, biological and cultural resources surveys, and preparation of agency permit applications. Key issues included the feasibility of alternatives, presence of California red-legged frog and Southern steelhead and designated critical habitat for these species, work in and near public parks, and topographically constrained work areas.

Principal In Charge, City of Goleta – San Jose Creek Bike Path, Santa Barbara County, California. Mr. Julian's team supported the City in securing regulatory approvals for a new bicycle and pedestrian path through riparian habitat along the bank of San Jose Creek. Due to community concerns, an arborist survey and complete tree inventory of the riparian area which included several hundred trees. A Streambed Alteration Agreement was ultimately issued and the City approved the project. Key issues for the project included mature tree removals and associated mitigation, as well as avoidance of historic resources (including one historic tree), and a constrained right-of-way with multiple adjoining landowners and stakeholders. Because San Jose Creek is designated critical habitat for the endangered Southern Steelhead, additional scrutiny was placed on ensuring that the design did not result in sedimentation or other water quality impacts to the creek, and did not involve in-channel work that would trigger the need for federal permits.

Principal-in-Charge, ElectriGarden Ventures, LLC, Cuyama Cannabis Cultivation Project, Santa Barbara County
Christopher oversaw preparation of County-required technical documents supporting development of a cannabis production property in the Cuyama valley in northeastern Santa Barbara County. Materials prepared included a Biological Resources Assessment, Cultural Resources Assessment, and Wildlife Movement Plan. Christopher's team also addressed comments on these documents provided by the County's third-party peer review consultant.

Principal-in-Charge, Central Balance Co., LLC, SR-246 Cannabis Cultivation Project, Santa Barbara County
Christopher oversaw preparation of County-required technical documents supporting conversion of an existing row-crop agricultural property to cannabis production. Studies prepared included a Habitat Protection Plan, Wildlife Movement Plan, and Tree Protection Plan. In addition, the project was required to assess impacts to the endangered California tiger salamander due to the proximity of breeding ponds for this species.

Principal in Charge – Confidential Client – Biological Assessment and Wetlands Delineation for a New Space Launch Complex, Santa Barbara County, California. Managed preparation of a Biological Assessment and aquatic resources delineation for a proposed new Space Launch Complex on Vandenberg Space Force Base to facilitate

compliance with ESA Section 7 and Executive Order 11990. The Biological Assessment evaluated effects on the Gaviota tarplant and California red-legged frog, which were known to occur within the Action Area, and included construction-related effects as well as long-term effects of diverting a nuisance water stream that was feeding a California red-legged frog habitat area. Oversaw incorporation of the Biological Assessment and aquatic resources delineation into an Environmental Assessment prepared pursuant to the National Environmental Policy Act.

Program Manager, Vandenberg Air Force Base – 3-Year Blanket Purchase Agreement for Natural Resources and NEPA Compliance, Santa Barbara County, California. Oversaw a team of professionals providing Natural Resources and NEPA support to environmental personnel at Vandenberg AFB. Projects included biological studies in compliance with the Programmatic Biological Opinion for the Base, including rare plant surveys, Western snowy plover and California least tern surveys, El Segundo blue butterfly surveys, wetlands delineations, construction monitoring, and marine mammal monitoring for rocket launches. In addition, Mr. Julian's team performed Environmental Baseline Studies, prepared NEPA and Section 7 documentation for Base projects, and created a hydrologic model of the Santa Ynez River to assess potential flood risks to Base infrastructure.

Principal-in-Charge, Hydrostor, Inc. – Pecho Advanced Compressed Air Energy Storage System, San Luis Obispo County, California. Oversaw a team of professionals preparing biological, cultural, and paleontological surveys and reports in support of an Application for Certification to the California Energy Commission for a compressed air energy storage project. The project was sited within the Coastal Zone. The project review included approximately 14 miles of alternative transmission line alignments. All surveys and documents were prepared to meet the Energy Commission's regulatory standards, and were accepted by Commission staff with only minor comments. Key issues addressed in the studies included steelhead trout, California red-legged frogs, modification of streams and wetlands, impacts to riparian vegetation, golden eagle foraging habitat, prehistoric and historic cultural resources, architectural history, and high potential for paleontological resources. Prior to the in-depth surveys, Mr. Julian oversaw a broad-spectrum environmental constraints analysis for the project that included aesthetics, biological resources, cultural resources, land use and zoning, geologic hazards, and water supply.

Principal-in-Charge, Santa Barbara County Flood Control District – Debris Basin Cleanout and Beach Nourishment, Santa Barbara County. Oversaw a team of professionals monitoring the deposition of sediment and debris from regional debris basins onto receptor sites at Goleta Beach and Carpinteria Beach. Source locations included basins throughout Santa Barbara County where maintenance dredging had occurred, including the upstream portions of Goleta Slough. Project personnel tallied incoming vehicles, visually assessed loads for inappropriate materials (e.g., anthropogenic debris, large rocks), and conducted periodic sediment and water quality sampling as loads were deposited onto the beach and mechanically pushed into the surf zone. The project entailed day and night work, seven days per week for several weeks, and required significant staffing and coordination for the team of approximately ten staff who were mobilized on an emergency basis with little notice.

Principal-in-Charge, Carpinteria Sanitary District – Floodwall Repair Project, Santa Barbara County. Chris directed a team of biologists and permitting specialists supporting replacement of a floodwall at the Carpinteria Sanitary District that provided flood protection to a wastewater treatment plant but had been severely damaged by extreme storm events. The project included an initial emergency repair, followed by a permanent fix authorized under non-emergency permits. Permits for the project included Clean Water Act sections 404/401, a Streambed Alteration Agreement, and a Coastal Development Permit. Technical studies for the project included an Aquatic Resources Delineation, biological resources and cultural resources studies, and a restoration plan. During construction, Chris' team conducted surveys for endangered steelhead trout and tidewater gobies, as well as biological monitoring. Following construction, temporarily impacted areas were restored with native plant species and monitored as required by agency permits.

Principal-in-Charge, Goleta West Sanitary District – Headquarters Upgrade Project, Santa Barbara County. Chris directed a Project Environmental Coordinator and supporting team of scientists overseeing compliance with conditions of approval during upgrades to the Goleta West Sanitary District's headquarters. The work was performed under contract to the District's legal counsel, Brownstein, Farber, Hyatt and Schreck. The team implemented conditions imposed by the project's Coastal Development Permit and CEQA documentation, which included surveys for nesting birds and wildlife and on-site biological monitoring during construction. The project was completed without non-compliance or other significant environmental incidents.

Principal Technical Advisor, Southern California Gas Company – Angeles Link Pipeline Permitting Feasibility, Multiple Counties, California. Advised a team performing a high-level permit analysis for potential clean renewable

hydrogen pipeline routes for the SoCalGas Angeles Link project, an envisioned hydrogen pipeline infrastructure network connecting future hydrogen production locations in eastern California and the Central Valley to load centers in the Los Angeles basin. The evaluation included analysis of potential environmental permit requirements for each route, key issues affecting environmental review under CEQA and NEPA, and identification of permitting options for each route segment. The routes under consideration included segments traversing federal lands (Bureau of Land Management, Department of Defense, and U.S. Forest Service) as well as segments in sensitive habitats, challenging terrain, and heavily urbanized areas.

Principal-in-Charge, Hydrostor, Inc. – Environmental Constraints Analysis for Advanced Compressed Air Energy Storage System Sites, Nevada and Arizona. Managed an interdisciplinary team of planners and environmental scientists conducting desktop-level constraints analyses for potential energy storage sites at locations throughout Nevada and Arizona. Potential issues investigated included land use/zoning compatibility, biological resources, cultural resources, and water supply, as well as general research into likely public interest/controversy. Sites included locations on federal (Bureau of Land Management) land, and the assessment included electrical transmission alignments through sensitive habitats, over waterways, and across federal lands.

Principal-in-Charge, City of Goleta – Stow Grove Park Master Plan, Santa Barbara County, California. Chris oversaw a team conducting biological resources evaluations for a large-scale overhaul of Stow Park, a large municipal park providing active and passive recreational opportunities for Goleta residents. The park includes a grove of mature redwood trees that are declining as a result of the 2010-2018 drought. Chris' team mapped vegetation and sensitive biological resource occurrences in the park, and worked with a design team to develop a Master Plan that accommodates necessary upgrades to the park while maintaining and enhancing the park's native biological resources. Key issues included oaks and other mature native trees, raptor nesting and roosting habitat, and monarch butterfly aggregation sites. Following development of the Master Plan, Chris' team prepared CEQA documentation and worked with City staff to secure City Council approval.

Principal-in-Charge, Lake Sherwood Homeowners' Association – Lake Sherwood Sediment Management Program, Ventura County. Chris oversaw a team of biologists, archaeologists, and permitting specialists working to secure programmatic permits for sediment management activities within Lake Sherwood, a privately-owned lake, and a series of sedimentation basins surrounding the lake. The basin were constructed to intercept sediment conveyed by the lake's tributary streams that would otherwise flow into the lake during storm events. However, due to increased erosivity following the Woolsey Fire, the watershed was generating sediment in excess of what the basins were sized to accommodate and it became urgently necessary to de-silt the basins to protect water quality in Lake Sherwood. Rincon's scientists performed biological and archaeological studies and a delineation of aquatic resources to support applications for a Section 404 Permit, Section 401 Water Quality Certification, and Lake/Streambed Alteration Agreement (Routine Maintenance). Following submittal of the applications, Rincon negotiated with the agencies to identify agreeable permit conditions. Key issues for the project included presence of the protected southwestern pond turtle, high potential for archaeological resources, and identifying a suitable compensatory mitigation site.

Principal Technical Advisor, Ventura County Watershed Protection District – Ecological Impacts Offset Plan for the Matilija Dam Ecosystem Restoration Project. Chris supported a multi-disciplinary team of biologists, regulatory specialists, and GIS analysts identifying ways to quantify ecological benefits from the planned removal of Matilija Dam in the upper Ventura River watershed. Numerous improvements will need to be constructed in the downstream watershed in advance of dam removal, and the intent of the project was to expedite permitting and mitigation for these projects by debiting their impacts from the longer-term ecological improvements that are expected when the dam is removed and the ecosystem recovers. The Ecosystem Impacts Offset Plan was prepared for use by the U.S. Army Corps of Engineers, the Los Angeles Regional Water Quality Control Board, and the California Department of Fish and Wildlife.

Principal-in-Charge, City of Goleta – 2023 and 2024 Emergency Storm Damage Repair Services, Santa Barbara County, California. Chris' team supported the City in obtaining expedited regulatory approvals to repair stormwater infrastructure, trails, and roads that were damaged during heavy storms in 2023 and 2024. The work program included several sites at locations throughout the City, including in the Coastal Zone and in public parks. Services included conducting abbreviated biological surveys, preparing agency notification materials, coordinating with

regulatory agencies, monitoring environmental compliance during construction, and preparing close-out documentation for each project.

Principal in Charge – City of Santa Barbara – Vic Trace Reservoir Replacement Project, Santa Barbara County, California. Mr, Julian oversaw a multidisciplinary team of environmental planners, archaeologists, biologists, and hazardous materials specialists supporting replacement of the Vic Trace reservoir, an aging underground water storage facility. Services included an initial constraints assessment followed by a suite of technical studies necessary to support evaluation of the project under CEQA. Studies prepared for the project include biology, cultural resources, paleontological resources, air quality, construction health risk, and traffic. Due to State Revolving Fund involvement, documents are being prepared to meet "CEQA-Plus" standards and consider relevant federal "cross-cutter" regulations.