



**US Army Corps
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San Francisco District

SAN FRANCISCO DISTRICT

Regulatory Division
450 Golden Gate Ave., 4th Floor
San Francisco, CA 94102-3406

PUBLIC NOTICE

PROJECT: Midpeninsula Regional Open Space District Open Space Maintenance and Restoration Program

PUBLIC NOTICE NUMBER: 2019-00146S
PUBLIC NOTICE DATE: November 23, 2021
COMMENTS DUE DATE: December 23, 2021

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1. **INTRODUCTION:** Midpeninsula Regional Open Space District, (Midpen, POC: Aaron Hebert, 650-625-6561), 330 Distel Circle, Los Altos, California, ahebert@openspace.org, through its agent, Horizon Water and Environment (POC: Jeff Thomas, 510-986-4054), 266 Grand Avenue, Suite 210, Oakland, California, jeff@horizonh2o.com, has applied to the U.S. Army Corps of Engineers (USACE), San Francisco District, for a Department of the Army Permit to implement the Midpeninsula Regional Open Space District Open Space Maintenance and Restoration Program (Program) throughout the Midpen’s over 64,000 acres of open space in the South Bay and San Francisco Peninsula, in San Mateo, Santa Clara, and Santa Cruz Counties, California. This Department of the Army permit application is being processed pursuant to the provisions of Section 404 of the Clean Water Act of 1972, as amended (33 U.S.C. § 1344 *et seq.*).

2. **PROPOSED PROJECT:**

Project Site Location The Program activities would occur within all Midpen Open Space Preserves (OSP), except for the Bayside OSPs, including Ravenswood OSP and Stevens Creek Shoreline Nature Study Area. The program areas are shown in Figure 1, Program Area, attached.

Project Site Description: Midpen protects over 64,000 acres of open space in the South Bay and San Francisco Peninsula, most of which are located in 26 OSPs in the Santa Cruz Mountains, in upper watershed areas and upland transitional zones, within either the Skyline region or Foothill region (refer to Figure 1). The Program area contains over approximately 900 culverts (including ditch relief and stream crossings), 150 trail bridges (including

fords, puncheons, and boardwalks), 25 vehicle bridges, approximately 230 miles of streams (including many as yet unmapped seasonal drainages and tributaries), 100 waterbodies (mostly ponds), 115 miles of single-track maintained unpaved trails, and 230 miles of maintained roads (including paved, unpaved seasonal, and unpaved all-season).

The Skyline region encompasses the western portion of the Program area from Pedro Point just south of Pacifica to the San Mateo and Santa Cruz counties boundary, and the Pacific Ocean east to between Skyline Boulevard and I-280. The Foothill Region encompasses the eastern portion of the Program area, covering the area just southeast of Upper Crystal Springs Reservoir to the Santa Clara and Santa Cruz County boundary at Loma Prieta Avenue and extending east from the Santa Cruz Mountains to San Francisco Bay.

Project Description: The applicant proposes to perform seventeen types of activities throughout their facilities, in three general categories (Table 1):

- 1) routine maintenance activities;
- 2) small-scale facility improvements and new low-intensity/small footprint facilities; and
- 3) restoration and enhancement projects

Culvert and Bridge Maintenance

Midpen proposes to maintain over 900 culverts, including ditch relief and stream crossings, which commonly require routine repair or replacement in response to due to improper installation, material deterioration (e.g., bottom of a corrugated metal pipe (CMP) culvert is beginning to rust), damaged headwalls

and energy dissipaters, or eroding outfalls. More than 50% of culverts on Midpen lands are between 15 feet and 35 feet long, with an average culvert length of 30 feet.

Midpen proposes to maintain over 150 trail bridges, including fords, puncheons, and boardwalks, and over 25 vehicular bridges throughout its OSPs. Vehicular and trail bridge maintenance activities would involve repairing or replacing guard or hand railings and decking on bridges, sealing joints, patching cracks on the bridge exterior, removing and re-applying paint, conducting general surface and deck treatments, adding surface material to low puncheons, clearing debris beneath the bridge abutments, and adding rock material to repair bridge abutments.

Road and Trail Drainage Feature Maintenance

Road and trail ditches, ditch relief culverts, fords and swales, rolling dips, and other drainage features collect runoff from the adjacent road and trail surfaces and control and direct stream flow. Maintenance of these drainage features is necessary to reduce flooding by providing flow carrying capacity; prevent erosion and scouring of the drainage feature, channel/stream, and adjacent roadway/trail and slopes; and reduce the delivery of pollutants, including sediment to streams. These facilities are inspected year-round and are cleaned when capacity is reduced by 10% to 30%.

Sediment and Debris Removal

Sediment and debris removal primarily would occur in ponds and culverts, ditches, rolling dips and other drainage features at road/trail crossings and rarely would occur in channels, beneath bridges, and at trash racks and other minor facilities. Sediment and debris removal activities typically would occur during the dry season, between April 15 and October 15; however, removal activities could be extended if conditions allow.

Streambank Stabilization

Streambank stabilization would involve the repair and stabilization of eroded or eroding streambanks to minimize water quality and erosion impacts. Streambank stabilization activities would include replacement or repair of damaged or failed sections of perched fill, rock riprap, geogrid embankment, timber pile walls, wooden or log cribwall bank revetments, and retaining walls. Streambank stabilization activities would take place on an as-needed basis, based on the risk of flooding, erosion, or bank failure. In an average hydrologic year (based on average seasonal precipitation), Midpen may work on up to two streambank stabilization projects, and following a wet hydrologic year or period, Midpen may work on up to four streambank

stabilization projects. Each year the total work distance would not exceed 100 feet per site.

Water Supply Structure Maintenance

Water supply infrastructure primarily consists of spring boxes, wells, water tanks, waterlines, and livestock troughs. Primary maintenance activities would involve replacing, extending, or realigning water lines; repairing failed or dilapidated spring boxes or wells; cleaning out clogged spring boxes and pipes to improve spring system; installing new spring boxes or troughs; removing minor amounts of vegetation to ensure water supply structures are functioning properly, and creating defensible space around water infrastructure per the Board of Forestry Fire Safe Regulations (2021). These structures would be inspected year-round on a regular basis and would generally be maintained annually by hand, as needed. Rebuilding water supply structures would be done less frequently, typically once every 5-10 years. If extensive digging is required, such as for installation of new water line or spring box, small mechanical equipment may be used (i.e., bobcat or small backhoe). When servicing wells, larger mechanical equipment may be required. If mechanical equipment is required, activities would typically occur between April and November. For purposes of this proposed Program, Midpen anticipates working on a maximum of four water supply structure maintenance projects per year. On average, a total of two water supply structure maintenance projects would occur annually.

Ponds

Maintenance work in ponds would include vegetation and sediment removal to maintain optimum water levels; shoring and filling in gaps or low spots on earthen berms; rocking berm tops in heavy use areas, and clearing outlets, inlets, pipes, and spillways for proper depth of ponds.

Minor Maintenance Activities

Other minor maintenance activities conducted by Midpen would include repair of fences, gates and signage and trash rack clearing. Fences and gates would be repaired as needed to protect the public and Midpen's property. Trail signs would be periodically kept clean from graffiti and repaired or replaced as needed. Graffiti removal would involve painting by hand or mechanical sprayers on trail signs or bridges or other structures. Additional structures that require minor repair would include scientific instrumentation (i.e., gages, sensors, etc.) and wildlife habitat structures (i.e., turtle platforms, exclusion screens, and spring box features). These structures would be

maintained with hand tools annually and are generally small in scale.

Vegetation Management

Vegetation management activities are currently conducted consistent with Midpen's Integrative Pest Management (IPM) Guidance Manual and Wildland Fire Resiliency Program's Vegetation Management Plan (VMP). The primary vegetation management activities that would be conducted under the proposed Program would be similar to those in the IPM and Wildland Fire Resiliency Program, but would be initiated as part of routine maintenance, habitat enhancement, or during new construction for small-scale facilities improvements.

Road and Trail Maintenance

Primary road maintenance activities would include repairing small potholes, repairing roadway base, repaving, sealing cracks, resurfacing, and oil and screen. These activities would be conducted to ensure a safe roadway surface for motorists and to prevent further roadway deterioration or failure. Most patching and resurfacing activities would occur between April and October.

Depending on roadway conditions, unpaved road surface maintenance activities would include re-grading the road to its existing grade or original cut, installing additional drainage structures (i.e., culverts, inside ditches, rolling dips), repairing/cleaning rolling dips and roadside ditches, filling ruts, relocating road surface materials that have moved due to erosion, and removing debris from landslides. In addition, minor relocation of roads (i.e., within 400 feet upstream or downstream of original location) would be conducted as long as it improves drainage, removes roads from environmentally sensitive areas, or increases stability.

Trail surface repair would involve adding the proper soil type to the problem area and re-compacting the soil. Re-grading a trail may be necessary to address problematic sections of a trail and would involve grading the trail back to the original cut and filling in ruts as needed. Earthen materials moved by erosion or landslides and washed into drainage ditches may require returning the earthen materials to the restructured trail. In some instances, due to severe erosion or the presence of landslides, short segments of a trail may require re-routing. Trails may be relocated within 400 feet upstream or downstream of the original location as long as the new trail improves drainage, removes a path from environmentally sensitive area, increases trail stability, or increases long-term operation and maintenance sustainability of the trail. Other trail maintenance work would include repairing and installing

new signage, removing graffiti, and repairing other trail structures.

Roadway or trail slide repairs would be performed on an as-needed basis to prevent additional failure of supporting soils or structures, and to reduce the potential risk of falling debris. Midpen would evaluate the cause of the instability and first aim to use earthen and biotechnical solutions to minimize adverse environmental effects. However, depending on the severity of the road slip-out/slide, construction of retaining wall systems or placement of riprap may sometimes be necessary. If the road surface is still intact underneath a slide, Midpen would clear the slides and place the soil on nearby road surfaces with appropriate drainage structures. The site would be stabilized with large rock or compacted and sloped soil to fill in the road prism. Occasionally in areas with large scale landslides, the entire slide moves. In cases where no reroutes are available to avoid the slide, Midpen would grade through the slide to reconnect the ends of trail and install drainage features to pass water across the trail.

New Small Scale Facilities Improvements

Existing building and structure improvements and repairs would include stabilizing historic residences (e.g., Thornewood Estate house and Hawthorns house), barns, stables and other structures in working ranches/farms; removing dilapidated structures; designing and constructing structures for sensitive species (e.g., turtle basking platforms, bird boxes, bat boxes); remodeling field staff offices and accessory structures, and tenant and workforce housing within the existing footprint; replacing and potentially relocating restrooms to more suitable areas; and conducting driveway improvements. Typically, this work would occur in uplands but may occur along the edges of riparian areas. It is anticipated that five building and structure improvement projects would be conducted each year.

Midpen is also responsible for maintaining septic, water supply, telephone, telecommunications, and other utilities within the proposed Program area. Utility work would be confined to areas surrounding existing residences, offices, restrooms, maintenance yards, and existing utility lines, typically located in areas that are already disturbed. Midpen anticipates working on two to four utility projects per year.

Recreational facility improvements would include new trails/road and reroutes, new trail and vehicle bridges, bridge replacements and bridge relocations, new interpretative facilities and signage, and wildlife crossings.

New small-scale improvements would include installation of new fencing and gates around riparian areas and stock ponds/wetlands to keep livestock out of these sensitive areas and relocation of water lines/water troughs that extend from water sources/storage to a location that allows for the better distribution of cattle to achieve desirable habitat objectives for soil health and erosion. Most of this work would be limited to existing or previously disturbed grazing lands and would be similar in nature to the maintenance of fences, roads, and water supply facilities.

Restoration and Enhancement Projects

The purpose of restoration and enhancement projects are to improve and/or create habitat for plant and animal species and to restore ecosystem function within Midpen OSPs. These projects may be utilized to offset impacts associated with other Program activities.

Basic Project Purpose: The basic project purpose comprises the fundamental, essential, or irreducible purpose of the project, and is used by USACE to determine whether the project is water dependent. The basic purpose of the program is to maintain, and restore or enhance Midpen Preserve lands and facilities, the RGP would streamline permitting for these activities. .

Overall Project Purpose: The overall project purpose serves as the basis for the Section 404(b)(1) alternatives analysis and is determined by further defining the basic project purpose in a manner that more specifically describes the applicant's goals for the project while allowing a reasonable range of alternatives to be analyzed. The overall project purpose is to streamline the permitting process and provide a more strategic and integrative approach to the planning and scheduling of Preserve maintenance, low-impact facility improvements, and habitat enhancement and restoration.

Project Impacts: The Program's temporary and permanent impacts to wetlands and other waters of the U.S. will be determined on an annual basis. Annual impacts to jurisdictional areas would be less than 0.9 acres of temporary disturbance per year, with a maximum of 5 acres of temporary impacts over the 5 year term of the permit.

Proposed Mitigation: The majority of impacts to jurisdictional waters would be temporary and the aquatic habitats would be restored to pre project conditions after project activities are completed. Midpen would implement general avoidance and minimization practices or best

management practices (BMPs) as well as measures focused on biological resources and habitat protection, cultural resources protection, erosion control, sediment and water quality control, and dewatering. These BMPs reflect current recommended practices and are incorporated into the Program. In addition to impact avoidance and minimization measures or BMPs, the Program includes several different mitigation options for offsetting potential impacts on wetlands, waters, riparian resources, and federally and state listed species. Once the Program is operating under regulatory approvals and permits, annual mitigation would be identified and implemented as necessary to address any potential impacts, including the need for any compensatory action. Program activities would be notified annually with mitigation needs would also be identified. Because of the nature of the Proposed Program and Midpen's work, the Program is considered to be self-mitigating.

Project Alternatives: Each year the proposed activities would be the minimum necessary to achieve the project goals for maintenance, improvements, and restoration projects. The alternative to the programmatic permit approach would be to permit each activity separately, which would more cumbersome and would cause delays to achieving the program goals.

3. STATE AND LOCAL APPROVALS:

Water Quality Certification: State water quality certification or a waiver thereof is a prerequisite for the issuance of a Department of the Army Permit to conduct any activity which may result in a fill or pollutant discharge into waters of the United States, pursuant to Section 401 of the Clean Water Act of 1972, as amended (33 U.S.C. § 1341 *et seq.*). The applicant is hereby notified that, unless USACE is provided documentation indicating a complete application for water quality certification has been submitted to the RWQCB within 30 days of this Public Notice date, the District Engineer may consider the Department of the Army permit application to be withdrawn. No Department of the Army Permit will be issued until the applicant obtains the required certification or a waiver of certification. A waiver can be explicit, or it may be presumed if the RWQCB fails or refuses to act on a complete application for water quality certification within 60 days of receipt, unless the District Engineer determines a shorter or longer period is a reasonable time for the RWQCB to act.

Water quality issues should be directed to the Executive Officer, California Regional Water Quality Control Board, San Francisco Bay Region, 1515 Clay Street, Suite 1400, Oakland, California 94612; or to the Executive Officer, California Regional Water Quality Control Board, Central Coast Region, 895 Aerovista Place, Suite 101, San Luis Obispo, California 93401, by the close of the comment period.

Coastal Zone Management: Section 307(c) of the Coastal Zone Management Act of 1972, as amended (16 U.S.C. § 1456(c) *et seq.*), requires a non-Federal applicant seeking a federal license or permit to conduct any activity occurring in or affecting the coastal zone to obtain a Consistency Certification that indicates the activity conforms with the state's coastal zone management program. Generally, no federal license or permit will be granted until the appropriate state agency has issued a Consistency Certification or has waived its right to do so. Since the some project activities would occur in the coastal zone or may affect coastal zone resources, the applicant is hereby advised to apply for a Consistency Determination California Coastal Commission to comply with this requirement.

Coastal zone management issues should be directed to the District Manager, California Coastal Commission, Central Coast District Office, 725 Front Street, Suite 300, Santa Cruz, California 95060-4508, by the close of the comment period.

Other Local Approvals: The applicant will be applying for the following additional governmental authorizations for the project: A Lake and Streambed Alteration Agreement to be issued by the California Department of Fish and Wildlife.

4. COMPLIANCE WITH VARIOUS FEDERAL LAWS:

National Environmental Policy Act (NEPA): Upon review of the Department of the Army permit application and other supporting documentation, USACE has made a *preliminary* determination that the project neither qualifies for a Categorical Exclusion nor requires the preparation of an Environmental Impact Statement for the purposes of NEPA. At the conclusion of the public comment period, USACE will assess the environmental impacts of the project in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. §§ 4321-4347), the Council on Environmental Quality's regulations

at 40 C.F.R. § 1500-1508, and USACE regulations at 33 C.F.R. § 325. The final NEPA analysis will normally address the direct, indirect, and cumulative impacts that result from regulated activities within the jurisdiction of USACE and other non-regulated activities USACE determines to be within its purview of Federal control and responsibility to justify an expanded scope of analysis for NEPA purposes. The final NEPA analysis will be incorporated in the decision documentation that provides the rationale for issuing or denying a Department of the Army Permit for the project. The final NEPA analysis and supporting documentation will be on file with the San Francisco District, Regulatory Division.

Endangered Species Act (ESA): Section 7(a)(2) of the ESA of 1973, as amended (16 U.S.C. § 1531 *et seq.*), requires Federal agencies to consult with either the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) to ensure actions authorized, funded, or undertaken by the agency are not likely to jeopardize the continued existence of any Federally-listed species or result in the adverse modification of designated critical habitat. As the Federal lead agency for this project, USACE has conducted a review of the California Natural Diversity Data Base, digital maps prepared by USFWS and NMFS depicting critical habitat, and other information provided by the applicant to determine the presence or absence of such species and critical habitat in the project area. Based on this review, USACE has made a preliminary determination that the following Federally-listed species and designated critical habitat are present at in the program area and may be affected by project implementation.

California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), marbled murrelet (*Brachyramphus marmoratus*), designated critical habitat for the California red-legged frog, and marbeled murrelet.

Program activities may result in temporary disturbance of habitats for these species, and there is a low likelihood that individuals may be injured or killed during implementation of these actions. To address project related impacts to these species and designated critical habitat, USACE will initiate formal consultation with USFWS, pursuant to Section 7(a) of the Act. Any required consultation must be concluded prior to the issuance of a Department of the Army Permit for the project. In the event that any Program activity is determined to have potential to result in take of NMFS-regulated listed fish species, project-specific incidental

take approval for that activity will be obtained through project-specific Clean Water Act permitting with the USACE.

Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA): Section 305(b)(2) of the MSFCMA of 1966, as amended (16 U.S.C. § 1801 *et seq.*), requires Federal agencies to consult with the NMFS on all proposed actions authorized, funded, or undertaken by the agency that may adversely affect essential fish habitat (EFH). EFH is defined as those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. EFH is designated only for those species managed under a Federal Fisheries Management Plan (FMP), such as the *Pacific Groundfish FMP*, the *Coastal Pelagics FMP*, or the *Pacific Coast Salmon FMP*. As the Federal lead agency for this project, USACE has conducted a review of digital maps prepared by NMFS depicting EFH to determine the presence or absence of EFH in the project area. Based on this review, USACE has made a *preliminary* determination that EFH is not present at the project location or in its vicinity and that consultation will not be required. USACE will render a final determination on the need for consultation at the close of the comment period, taking into account any comments provided by NMFS. In the event that any Program activity is determined to have potential to result in adverse effects to EFH, project-specific consultation for that activity will be obtained through project-specific Clean Water Act permitting with the USACE.

Marine Protection, Research, and Sanctuaries Act (MPRSA): Section 302 of the MPRSA of 1972, as amended (16 U.S.C. § 1432 *et seq.*), authorizes the Secretary of Commerce, in part, to designate areas of ocean waters, such as the Cordell Bank, Gulf of the Farallones, and Monterey Bay, as National Marine Sanctuaries for the purpose of preserving or restoring such areas for their conservation, recreational, ecological, or aesthetic values. After such designation, activities in sanctuary waters authorized under other authorities are valid only if the Secretary of Commerce certifies that the activities are consistent with Title III of the Act. No Department of the Army Permit will be issued until the applicant obtains any required certification or permit. The project does not occur in sanctuary waters, and a *preliminary* review by USACE indicates the project is not likely to affect sanctuary resources. This presumption of effect, however, remains subject to a final determination by the Secretary of Commerce or his designee.

National Historic Preservation Act (NHPA): Section 106 of the NHPA of 1966, as amended (16 U.S.C. § 470 *et seq.*), requires Federal agencies to consult with the appropriate State Historic Preservation Officer to take into account the effects of their undertakings on historic properties listed in or eligible for listing in the *National Register of Historic Places*. Section 106 of the Act further requires Federal agencies to consult with the appropriate Tribal Historic Preservation Officer or any Indian tribe to take into account the effects of their undertakings on historic properties, including traditional cultural properties, trust resources, and sacred sites, to which Indian tribes attach historic, religious, and cultural significance. As the Federal lead agency for this undertaking, USACE has conducted a review of the latest published version of the *National Register of Historic Places*, survey information on file with various city and county municipalities, and other information provided by the applicant to determine the presence or absence of historic and archaeological resources within the permit area. Based on this review, USACE has made a *preliminary* determination that historic or archaeological resources are present in the permit area and that such resources may be adversely affected by the project. In the event that any Program activity is determined to have potential to result in impacts to historic or archaeological resources, USACE will initiate consultation with the State Historic Preservation Officer or the Tribal Historic Preservation Officer, pursuant to Section 106 of the Act. Any required consultation must be concluded prior to the issuance of a Department of the Army Permit for the project. .

5. COMPLIANCE WITH THE SECTION 404(b)(1) GUIDELINES: Projects resulting in discharges of dredged or fill material into waters of the United States must comply with the Guidelines promulgated by the Administrator of the Environmental Protection Agency under Section 404(b) of the Clean Water Act (33 U.S.C. § 1344(b)). An evaluation pursuant to the Guidelines indicates the project is dependent on location in or proximity to waters of the United States to achieve the basic project purpose because the structures that Midpen proposes to maintain are already within waters of the U.S., therefore their maintenance must occur within waters of the U.S. This conclusion lowers the (rebuttable) presumption of the availability of a practicable alternative to the project that would result in less adverse impact to the aquatic ecosystem, while not causing other major adverse environmental consequences.

6. PUBLIC INTEREST EVALUATION: The decision on whether to issue a Department of the Army Permit will

be based on an evaluation of the probable impacts, including cumulative impacts, of the project and its intended use on the public interest. Evaluation of the probable impacts requires a careful weighing of the public interest factors relevant in each particular case. The benefits that may accrue from the project must be balanced against any reasonably foreseeable detriments of project implementation. The decision on permit issuance will, therefore, reflect the national concern for both protection and utilization of important resources. Public interest factors which may be relevant to the decision process include conservation, economics, aesthetics, general environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shore erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership, and, in general, the needs and welfare of the people.

project modifications of a minor nature may be obtained from the applicant and/or agent or by contacting the Regulatory Permit Manager by telephone or e-mail (cited in the public notice letterhead). An electronic version of this public notice may be viewed under the *Public Notices* tab on the USACE website: <https://www.spn.usace.army.mil/Missions/Regulatory>.

7. CONSIDERATION OF COMMENTS: USACE is soliciting comments from the public; Federal, State, and local agencies and officials; Native American Nations or other tribal governments; and other interested parties in order to consider and evaluate the impacts of the project. All comments received by USACE will be considered in the decision on whether to issue, modify, condition, or deny a Department of the Army Permit for the project. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, and other environmental or public interest factors addressed in a final environmental assessment or environmental impact statement. Comments are also used to determine the need for a public hearing and to determine the overall public interest in the project.

8. SUBMITTING COMMENTS: During the specified comment period, interested parties may submit written comments to Frances Malamud-Roam, San Francisco District, Regulatory Division, 450 Golden Gate Avenue, 4th Floor, San Francisco, California 94102-3404 (email: frances.p.malamud-roam@usace.army.mil); comment letters should cite the project name, applicant name, and public notice number to facilitate review by the Regulatory Permit Manager. Comments may include a request for a public hearing on the project prior to a determination on the Department of the Army permit application; such requests shall state, with particularity, the reasons for holding a public hearing. All substantive comments will be forwarded to the applicant for resolution or rebuttal. Additional project information or details on any subsequent