



**Sutter Butte Flood Control Agency  
Feather River West Levee Project**

**INDEPENDENT PANEL OF EXPERTS (IPE)  
REVIEW OF  
ENGINEER'S REPORT TITLED**

***“Feather River West Levee Phase I  
ULDC Compliance  
Station 512+00 to 1674+37 and Station 1769+31  
to 2368+26  
Sutter Butte Flood Control Agency  
Sutter and Butte Counties, California  
October 8, 2021”***

**AND IPE LETTER OF CONCURRENCE (EVD-1)**

**October 8, 2021**

**IPE Members**

**Mr. Thomas W. Smith, PE, GE, RiverSmith Engineering  
Mr. George L. Sills, PE, Sills Engineering  
Mr. Donald H. Babbitt, PE, GE, Consulting Engineer**

Mr. Michael Bessette, Sutter Butte Flood Control Agency

October 8, 2021

Mr. Michael Bessette, PE  
Executive Director  
Sutter Butte Flood Control Agency  
P.O. Box M  
1445 Butte House Road, Suite B  
Yuba City, CA 95992

Dear Mr. Bessette:

**Subject: Sutter Butte Flood Control Agency (SBFCA), - Feather River West Levee Improvements (FRWL), Review of Engineer's Report for Levee Improvements - ULDC Compliance**

**Summary**

As required by the Urban Level of Flood Protection (ULOP) criteria, this letter is the summary review report by the Independent Panel of Experts (IPE) of the subject line Engineer's Report. That report was prepared consistent with the published Urban Level of Flood Protection Criteria, to provide evidence for an EVD-1 criterion to support a finding related to a 200-year urban level of flood protection based on the design and construction of a system that includes levee improvements on the Feather River West Levee.

The flood control features covered by the Engineers' Report for Phase I of this project, include the following reaches of the Feather River West Levee, Station 512+00 to 1674+37 and Station 1769+31 to 2368+26 in Sutter and Butte Counties. Stations 1674+37 to 1769+31 (Reaches 26 through 28) are considered a freeboard levee reach since the 200-year water surface is below the existing ground surface. No work was done in those reaches and they are not covered in the Report.

The Engineer's Report for the rehabilitation of the Feather River West Levee design and construction was prepared by the SBFCA design team consisting of HDR, Wood Rodgers, AECOM (legacy URS), PBI, and MHM Incorporated.

Construction of the FRWL Project Phase I addressed in this report officially began on July 25, 2013 and was completed in November 2020. These features are designed to provide a 200-year level of flood protection.

The IPE concurs with the set of conditions and facts outlined in the Engineer's Report, which support a 200-year Urban Level of Flood Protection for the Feather River West Levee Floodplain as shown in Figure 2 of that Report.

### **Flood Control Project Purpose**

SBFCA is the project sponsor responsible for the rehabilitation of the flood control system that protects the Sutter Butte basin in Sutter and Butte Counties. The Sutter Butte basin includes the Cities of Biggs, Gridley, Live Oak and Yuba City. This basin has been confined by man-made levees since the late 1800's. The west levee of the Feather River (WLFR) has been subjected to high water events of 1955, 1964, 1986, 1997 and 2017 that have resulted in levee distress problems consisting of cracks, boils, seepage, and a breach.

The purpose of this project is to remedy the problem areas within the levees and provide a 200-year level of protection to the communities mentioned above within the floodplain of the west levee of the Feather River.

### **Background for Reports and IPE Review**

As a result of Senate Bill 5, enacted in 2007, state law requires that levee systems meet a 200-year Urban Level of Flood Protection before cities and counties can approve certain land-use decisions. The levee criteria associated with an Urban Level of Flood Protection and what is required for substantial evidence in the record is contained in the following two documents:

1. Urban Levee Design Criteria (ULDC) – published by the Department of Water Resources (DWR) in May 2012, this document outlines the technical guidance and requirements for 20 technical areas associated with levee integrity and the evaluations needed to assure that an Urban Level of Flood Protection is met.
2. Urban Level of Flood Protection (ULOP) – published in November 2013 by DWR, this document describes the processes for having substantial evidence in the record to support a finding related to an urban level of flood protection based on flood management facilities providing the required level of flood protection.

### **Engineers' Reports Prepared by the Design Team**

The IPE has been continuously interacting with the Design Team since early 2011 by participating in design review and updates as well as construction reviews. It has reviewed and commented on the initial draft of the Engineer's Report (dated December 18, 2020) prepared by the Phase 1 design team (lead by HDR). Those IPE comments and questions regarding the original draft report were submitted to the Team. As a result, the Engineer's Report was revised to address the IPE comments and submitted an updated Report (dated August 2, 2021) for final review and concurrence by the IPE as well as the comment tracking spreadsheet.

The revised report addressed all IPE comments. The final copy of the IPE comments, Engineer's responses to IPE comments, and IPE backchecks are contained in an Excel Spreadsheet that is attached to this report.

**IPE Findings on Engineers' Reports**

The IPE makes the following findings in regard to the October 8, 2021 version of the Phase I, Engineer's Report prepared by the Design Team (HDR leadership):

1. The Engineer's Report has been prepared under the direction of licensed Civil Engineer in the State of California; Michael W. Bessette, who has signed and stamped the final document.
2. The Engineer's Report includes a complete list of the flood management facilities that will be utilized in providing an urban level of flood protection, namely the levee and a closure structure. The Engineer's Reports is organized to follow the Urban Levee Design Criteria (ULDC) outline.
3. The Engineer's Report identifies in text and in plates the locations of the flood protection facilities as well as levee stationing.
4. The Engineer's Report identifies the local maintaining agencies that operate and maintain the flood management facilities that will be utilized in providing an urban level of flood protection, including Levee Districts 1 and 9 of Sutter County and State Maintenance Areas 7 and 16.
5. The Engineer's Report contains a large reference list of reports, evaluations, inspections, and performance history of the flood management facilities. These reports were discussed and considered in the Engineer's Report.
6. As noted above, the Engineer provided responses to the review comments of the IPE and made changes, clarifications, and improvements to the report.
7. The Engineer's Report demonstrates a clear understanding of the requirements of DWR's ULDC and discusses where the levee system currently stands with regard to meeting each of the 20 ULDC criteria.

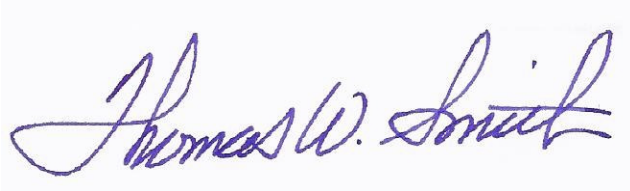
**IPE Concurrence**

Based on our review of the Engineer's Report dated 10/8/2021 the IPE for the Feather River West Levee Project supports the information and findings in this Engineer's Report and also agrees with the assertions and conclusions contained within.

Mr. Michael Bessette, Sutter Butte Flood Control Agency

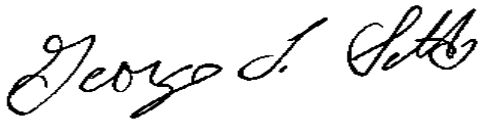
**Sutter Butte Flood Control Agency  
West Feather River Levee Project**

**Independent Panel of Experts**

A handwritten signature in blue ink that reads "Thomas W. Smith". The signature is fluid and cursive.

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**Thomas W. Smith, PE, GE  
Chairman**

A handwritten signature in black ink that reads "George L. Sills". The signature is cursive.

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**George L. Sills, PE**

A handwritten signature in black ink that reads "Donald H. Babbitt". The signature is cursive.

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**Donald H. Babbitt, PE, GE**

Attachment: IPE Comment Spreadsheet, dated 10/8/2021

## Administrative Draft Engineer's Report Feather River West Levee Phase I ULDC Compliance

Sutter Butte Flood Control Agency

Feather River West Levee

### IPE REVIEW

Document Under Review:

[SBFCA ULOP Finding Report EVD-1 Draft 12 18 2020](#)

Backcheck Document:

ADMIN USE ONLY		REVIEWER			RESPONDENT					REVIEWER				
COMMENT ID <small>(DO NOT Edit this Column)</small>	REVIEWER CONTACT INFO <small>(DO NOT Edit This Column)</small>	LOCATION IN REPORT/DOC	DATE OF ORIGINAL REVIEW MM/DD/YY	ORIGINAL REVIEW COMMENT	RESPONDENT CONTACT INFO	DATE OF RESPONSE MM/DD/YY	RESPONSE	CONCUR	NON-CONCUR	FIO	CARRY FORWARD	CLOSED Y / N	DATE MM/DD/YY	BACK CHECK COMMENT <small>(Needed Only if NOT Closing Comment)</small>
<b>New Comments on DOCUMENT TITLE</b>														
draft_EVD-1_001	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Page 1	12/21/20	Is the reason only Reaches 7 thru 41 are included because they are the only 200-year flood level of protection levees while the downstream reaches aren't?	Chris K		Yes, you are correct. Only the levees providing a 200-year level of flood protection for urbanized areas are being evaluated for seismic vulnerabilities. Reach 6 for the Star Bend Setback Levee also falls into this category, but is being addressed separately by Wood Rogers.	X				Y	8/10/2021	
draft_EVD-1_002	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Pages 24 & 25	12/22/20	I'm a little confused by what the difference is between Tables 5 and 6 other than Table 6 shows minor damage in many Reaches where Table 5 shows severe or compromised. This might need a bit more explanation in the text as to the differences and which one is selected to be carried forward in your analysis.	Chris K		The differences in the tables reflect the results of two separate sets of seismic assessments by URS for the same general reaches of the Feather River West Levee - one done in 2012 and one done in 2015. Both sets of results were considered in the current seismic vulnerability assessment, even though they were sometimes in conflict with each other. Table 7 summarizes the results of the current assessment as well as the values shown by the two previous studies. As explained in the text, we reviewed the borehole profiles in each reach, considered the previous assessments by URS, and then developed a more detailed set of assessments based on the results, how much of each reach was represented by the previous analyses, and using engineering judgment to estimate the approximate lengths in the reach that would sustain different damage levels. In general, the previous URS analyses analyzed the worst, most susceptible conditions within each reach. However, these conditions were generally not prevalent in each reach and lower levels of damage would be expected in other segments in the reach.					Y	8/10/2021	We are somewhat reluctantly closing out this comment. While we can follow your explanation, our preference would have been for you to provide a little more clarity in the text itself. A first time reader (at some time in the future) may also have some trouble following the path from Tables 5 and 6 to the summary Table 7 when there is an entire Appendix in between.
draft_EVD-1_003	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Page 27	12/22/20	In Table 7, am I correct in assuming that there are 3 seismic vulnerabilities analyses included here? URS (2012), URS (2015a) and HDR?	Chris K		Generally, yes. The two previous URS analyses generally developed the worst level of performance for a reach or sub-reach. We have used these two previous studies and have extended them to greater detail. In our current seismic vulnerability assessment, HDR/AECOM have tried to go to a greater level of specificity and identify the lengths that would be estimated for the four damage levels in order to have a more accurate assessment of the level of levee damage that might be sustained in a 200-year earthquake. See response above as well.					Y	8/10/2021	Same comment as above.
draft_EVD-1_004	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Page 27	12/22/20	There appears to be a leap of faith from Tables 5 and 6 to Table 7. Do I have to review Appendix A for all the details? More narrative in this section might be helpful to the reader.	Chris K		Table 7 is an abbreviated form of Table D-1 in Appendix D. The main benefit of looking at the table(s) in Appendix D is that it provides some of the reasoning for developing the different amounts of damage levels in each reach/sub-reach					Y	8/10/2021	Same comment as above.

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draft_EVD-1_005	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Page 35	12/22/20	Last bullet on this page mentions that very little imported borrow would be needed. The distorted fill would be adequate. Doesn't this depend on the amount of foundation liquefaction that occurs and if collapse occurs in the foundation?	Chris K		The levee fill is not expected to collapse completely into the foundation because the levee sections are founded on an unsaturated, over consolidated surface cap or blanket layer. This would only happen if there was a very loose, thick, and saturated sand deposit immediately beneath the levee embankment, and these conditions are not present along the Feather River. Further, the 200-year ground motions at 0.11g - 0.13g are very low. Note that the heavily damaged levees shown in Figures 5-8, 11, and 13 for the much more damaging 2011 Tohoku (M9) and 1989 Loma Prieta (M7.1) earthquakes still showed that most of the levee fill, albeit heavily cracked and damaged, in place. The shaking for these earthquakes were 3 to 5 times as high, and the Tohoku Earthquake lasted about 2 minutes - about 10 times as long as what we are discussing. The high end of Compromised damage shown in Figure 18 is believed to represent the very extreme end of potential damage for this project, and even this is pretty unlikely and conservative. Nevertheless, this schematic shows not only is there a lot of distorted fill to rebuild, but also that the 10-year levee section is still present even without any reconstruction.					Y	8/10/2021	
draft_EVD-1_006	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Page 37	12/22/20	The first bullet says displacement will be "mostly waterside". What is the reason for this over the landside when the landside is generally the steeper slope?	Chris K		The slopes on the waterside and landside portions of the levee embankment are not that different and have a relatively small effect on overall post-earthquake stability because potential sliding is controlled by deep potential sliding surfaces into the liquefied foundation. Shallow potential sliding surfaces within just the embankment are indeed more critical on the landside than the waterside slopes, but these surfaces are not critical because the levee fill is unsaturated and doesn't lose shear strength (note significantly higher factors of safety for shallow sliding surfaces in Figure 9 and in Appendices A and B). It is the saturated sand and silty sand layers at depth in the foundation that can liquefy and lose strength. Therefore, sliding at depth within the liquefied sand/silty sand layers is controlling. As shown in Figure 9 and in the figures in Appendices A and B, waterside stability is lower because of the lower ground surface associated with the river channel - sometimes the waterside surfaces daylight horizontally into the river channel.	Y				Y	8/10/2021	

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draft_EVD-1_007	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability	12/29/20	On December 27th the largest earthquake in Northern California in the last 50 years (3.9) occurred about a mile north of Butte City on the Sacramento River. Were there any known reports of levee damage or settlements?	Chris K		Not that we are aware of. It usually requires an earthquake of at least Magnitude 5.5 to induce even minor ground damage. Note also that about 45 years ago, we had the 1975 Oroville Earthquake (M6). Located a few miles south of Oroville Dam, I am not aware of any significant ground failures or levee damage near the Feather River at that time.  Update 10/8/2021 - comment resolved via email and IPE concurrence obtained on 10/8/21. Report was not update to reference the minor earthquake as not there are no inspection reports or indications of damage from it.		X				Y	8/10/2021	This is an important piece of information and is worthy of including in the narrative. It could also serve as a baseline piece of information for the future.
draft_EVD-1_008	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Page 2	12/29/2020	It would help if Figure 1 included the Reaches. I have to find a map elsewhere to determine where the worst ones (Reaches 12, 13, 14 and 15) were located.	Chris K		Concur. We will look for a better figure showing the reaches.	X				Y	8/10/2021		
draft_EVD-1_009	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Page 27	12/29/2020	In Table 7, I guess it shouldn't surprise me that the highest risk reaches have had past failures.	Chris K		Noted. Probably related to thickest, shallow sand layers present - bad for both underseepage and potential liquefaction.	X				Y	8/10/2021		
draft_EVD-1_010	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Page 35	12/29/2020	In Section 4.3 -Permanent Repairs - Would adding a bullet regarding some foundation investigation be worthy? Or, is there enough existing information?	Chris K		Probably depends upon the area damaged. We could add a bullet that states that additional geotechnical investigations may be needed, particularly for investigating the integrity of the cutoff walls.	X				Y	9/2/2021	"We could add"? Strange wording within the response... Was this actually added? Without a track changes mode it is difficult to see that this was done. We are willing to sign off if there was follow thought to make the change.	
draft_EVD-1_011	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability	12/29/2020												
draft_EVD-1_012	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability General	12/22/2020	Discuss performance of levee penetrations during earthquakes.	Chris K		<b>Concur. We had intended to cover this in Chapter 5 related to considerations for the Emergency Action Plan but it somehow was left out. We will add language to state something like: "Penetrations, especially pipelines, need to be evaluated following earthquake events. For pipelines within damaged levees, fluid flows through the pipelines should be halted until the assessments are completed. Pipelines within levees which have experienced Severe or Compromised levels of damage should be presumed to be damaged and not used until confirmed to have no damage or are repaired or replaced. Pipelines without valve closures near the toes of such levees should be plugged within as soon as possible after the earthquake, and certainly less than 8 weeks following the earthquake, to assure no fluid flows through the presumed pipeline sections within the levee and/or its foundation."</b>	X				Y	9/2/2021		



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draft_EVD-1_013	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability General	12/22/2020	To demonstrate compliance with ULOP, state how the river levels used for the stability analyses in the 2005 and 2012 reports were selected.	Chris K		In the previous 2012 and 2015 URS slope stability analyses, river levels were considered representing the mean summer and the mean winter conditions, in compliance with the ULDC. The higher of the two river levels was used in the analyses. We can add this statement.		X			Y	9/2/2021	"We can add"? Was this actually added? See comment above.
draft_EVD-1_014	Thomas W. Smith, PE, GE 916.835.4456	Seismic Vulnerability Sec 2.5, 1, b	12/22/2020	Briefly explain the 0.7 correction here and in Table 3, Note 3.	Chris K		<u>Believe you meant Note 2 in Table 3</u> Newmark-type displacement estimates are made along the potential sliding surfaces, which are inclined - not vertical. To estimate the vertical component of displacement as a step in estimating crest settlement, practitioners usually select somewhere between 50 and 75 percent of the computed displacement. The DWR/URS Guidance Document for Geotechnical Analyses recommended using 70 percent (0.7 factor) [see Page 6-18] and this was also used in the URS (2012) analyses. We saw no reason to change this assumption and kept it unmodified in considering the results from the 2012 analyses.					Y	9/2/2021	
draft_EVD-1_015														
draft_EVD-1_016	Thomas W. Smith, PE, GE 916.835.4456	LMA Summaries LD1	12/30/2020	On page A-11, the overall LMA rating is "A" while there is shown a critical erosion site in Figure on the previous page. Please explain.	Libby		As of release of DWR's 2019 Inspection and LMA Report, the 2017 Storm Damage Emergency Rehabilitation Program and the 2018 Flood Maintenance Office's Flood System Repair Program (FSRP) identified sites are not included in the calculation of the LMA's overall rating (this is supposedly changing in the 2020 report which is not yet released so I was unable to verify). These sites are included in the Appendix so that the information "can be used by LMAs and other emergency responders to identify areas to monitor during a high water event." With all that said, the SBFCA project does fix and will remove seepage site FSRP-17-272. Sites LD1-S-02/PSRP-17-145 was planned for PL84-89 repair in 2020. The other site, FSRP-13-64 is currently not covered within the station range of this EVD-1 report.	X				Y	9/14/2021	We assume then that this information is included for general information for future users of this report.
draft_EVD-1_017	Thomas W. Smith, PE, GE 916.835.4456	LMA Summaries LD9	12/30/2020	On Page A=23, the overall LMA rating is "A" while on Page A-24 there is reported <b>levee erosion, loss of grade, major settlement, and sloughing as relevant impairments or compromising conditions</b> . Please provide more details so this doesn't appear to be conflicting.	Libby		HDR obtained the Fall 2020 Levee Maintenance Deficiency Summary Report and that particular comment is no longer included. It is unclear why this vague comment was included on the 2019 Report.					Y	9/14/2021	
draft_EVD-1_018	Thomas W. Smith, PE, GE 916.835.4456	LMA Summaries MA-3	12/30/2020	On Page A-319, the overall LMA rating is "A". The previous figure shows critical erosion and page A-320 included the following statement: <b>The Spring 2019 Inspection Report provided unacceptable ratings for utility crossings. Same comment as above.</b>	Sean M	2/1/21	SBFCA is not certifying MA 3. MA 3 is south of Starr Bend Setback Levee. We concur it has numerous items that are unacceptable though but they fall outside of the limits of this finding.			X		Y	9/14/2021	
draft_EVD-1_019	Thomas W. Smith, PE, GE 916.835.4456	LMA summaries MA-7	12/30/2020	Same Comment. <b>The Spring 2019 Inspection Report provided unacceptable ratings for a utility crossing and an encroachment item.</b>	Sean M	2/1/21	We pulled the detailed Spring 2019 and 2020 Inspection Report and there are unacceptable rating for utilities within MA 7. These unacceptable rated items all occur within reaches 26, 26, and 28 which are not part of SBFCA certification. This will not impact MHM's EVD-1 finding.			X		Y	9/14/2021	

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draft_EVD-1_020	Thomas W. Smith, PE, GE 916.835.4456	EVID-1 Report Page 19	12/30/2020	Include PE number. Also on other signature pages signed by Robert Green.	Daniel	1/24/21	Agreed. PE number has been updated					Y	9/14//21	