

COASTAL CONSERVANCY

Staff Recommendation

April 27, 2017

TAYLOR YARD RIVER PARK IMPLEMENTATION PLAN

Project No. 17-004-01

Project Manager: Kara Kemmler

RECOMMENDED ACTION: Authorization to disburse up to \$2,000,000 to the City of Los Angeles to develop the Implementation Plan and install fencing and signage for the Taylor Yard River Park on the Los Angeles River in the City of Los Angeles, Los Angeles County.

LOCATION: City of Los Angeles, Los Angeles County

PROGRAM CATEGORY: Integrated Coastal and Marine Resource Protection, Public Access

EXHIBITS

Exhibit 1: [Project Location and Site Map](#)

Exhibit 2: [ARBOR Study Figures](#)

Exhibit 3: [Project Letters](#)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31111, 31220, and 31400 *et seq.* of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of up to two million dollars (\$2,000,000) to the City of Los Angeles (“the grantee”) to develop the Implementation Plan and to install fencing and signage for the Taylor Yard River Park on the Los Angeles River in the City of Los Angeles, subject to the following conditions:

1. Prior to the disbursement of funds, the grantee shall submit for the review and written approval of the Conservancy’s Executive Officer a work program, including budget and schedule, and any contractors to be retained for project work.
2. The grantee shall ensure that the plan and design of project access facilities is consistent with all applicable federal or state laws governing access for persons with disabilities.”

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 3 of Division 21 of the Public Resources Code regarding funding feasibility studies and plans (Section 31111), Chapter 5.5 regarding improving and protecting coastal and marine water quality and habitats (Section 31220) and Chapter 9 regarding public access (Sections 31400 *et seq.*).
 2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
 3. The proposed project will serve greater than local public needs.”
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PROJECT SUMMARY:

Staff recommends that the Conservancy authorize up to \$2,000,000 to the City of Los Angeles (City) to develop the Implementation Plan for the Taylor Yard River Park on the Los Angeles River (LA River) in the City of Los Angeles, Los Angeles County.

Taylor Yard River Park is a 41-acre parcel adjacent to the LA River in the City, just north of downtown (Exhibit 1). The City recently acquired the parcel, also known as “G2”, for the purposes of restoring floodplain function and riparian habitat and providing public access to and along the LA River. The site is a brownfield and restoration will be complicated by legacy contamination, but offers a rare opportunity to restore riparian ecosystem function along the river as well as the first opportunity to provide direct access to the LA River in historically underserved communities. Development of the Implementation Plan for the Taylor Yard River Park is the next step toward advancing these goals.

Taylor Yard River Park is a project in the City Council-adopted Los Angeles River Revitalization Master Plan (LARRMP). The 2007 LARRMP identifies Taylor Yard River Park as a centerpiece of one of five primary “opportunity areas” for revitalization of the river corridor. Taylor Yard River Park is also a project in the Recommended Plan of the US Army Corps of Engineers’ (USACE) Los Angeles River Ecosystem Restoration Feasibility Study (also known as the ARBOR Study or “Area with Restoration Benefits and Opportunities for Revitalization” Study) for which the City serves as the USACE’s local sponsor. The ARBOR Study prioritizes this site as the nearest-term opportunity to remove the LA River’s concrete channel and extend the historic floodplain by approximately 300 feet to accommodate riparian habitat that will include wetlands and freshwater marsh.

Fundamentally, the Taylor Yard River Park is critical to fulfillment of the ARBOR Study ecosystem restoration goals. The ARBOR Study involves restoring an 11-mile corridor of the LA River from approximately Griffith Park to downtown Los Angeles, while maintaining existing levels of flood risk management. This corridor was chosen because of existing riparian habitat within the soft-bottomed portion of the river’s channel and because it includes opportunities to connect to existing large open spaces nearby and to three of the river’s tributaries. Restoration measures include creation and reestablishment of historic riparian strand and freshwater marsh habitat to support increased populations of wildlife and enhance habitat connectivity within the study area, as well as to provide opportunities for connectivity to nearby

habitat areas, such as the Santa Monica Mountains, Verdugo Hills, Elysian Hills, and San Gabriel Mountains (Exhibit 2). Restoration includes the reintroduction of ecological and physical processes, such as a more natural hydrologic and hydraulic regime that reconnects the river to historic floodplains and tributaries, reduced flow velocities, increased infiltration, improved natural sediment processes, and improved water quality. The ARBOR Study also includes recreation objectives supporting linkages to regional trail networks and enhanced recreation experiences compatible with the restored environment.

The City is ready to move forward with the development of the Implementation Plan for Taylor Yard River Park on the LA River. The City will convene a project implementation team, including the Conservancy, Santa Monica Mountains Conservancy (SMMC), California Department of Parks and Recreation (State Parks), Metro, Metrolink, USACE, various NGOs which are conducting restoration work and implementing the seasonal recreation zone programs near and along the site, and representatives of applicable elected officials. The proposed planning effort will include:

- A plan for safe near-term (prior to permanent use) public access;
- A plan for long-term access, use and management responsibilities;
- A revised Remedial Action Program (RAP);
- Public engagement and involvement, particularly from the surrounding communities;
- Three buildable, scalable, phase-able design concepts (each with interim and long-term schematics for a total of six design concepts) that accommodate public access, habitat restoration consistent with the ARBOR Study and compatible recreation;
- A project financing plan outlining interim to permanent use options;
- A plan for long-term operations and maintenance; and
- A plan for construction of first phase of the Taylor Yard River Park within five years.

In addition, as part of the proposed project, the City will install fencing and signage to secure the site and protect public safety during the planning process.

In addition to local (the City) and federal (USACE) federal prioritization of the Taylor Yard area, Taylor Yard River Park is a long-standing priority of the State as indicated in the California Resources Agency's 2001 *Common Ground Plan*, the Conservancy's 2002 *Taylor Yard Multiple Objective Feasibility Study*, and State Parks' 2005 *Rio de Los Angeles State Park General Plan*. The SMMC will be a key partner in the park's development and is in the process of seeking a \$25 million grant from the California Wildlife Conservation Board (WCB) that, if awarded, will provide \$20 million for a river-edge conservation easement on the G2 site along with \$5 million to develop the site for near-term river access for recreational purposes while the remainder of the site is remediated. The Taylor Yard River Park will leverage a substantial investment already made by the State of California in acquiring the adjacent parcels (Bowtie upstream and Rio de Los Angeles State Park inland) and will finally connect those parcels to the LA River.

Site Description: The 41-acre G2 parcel is one of several parcels that made up the former Taylor Yard railyard on the eastern bank of the LA River, north of downtown LA. The juxtaposition of

an industrially zoned lot contaminated by railyard activities for over a century that is also located in a gently sloping river valley known as the Glendale Narrows, one of the few reaches where the river has a “soft” bottom allowing riparian vegetation to grow, yields a rare restoration opportunity. In addition to its connection to the LA River and its potential impact on a watershed level, the site sits in an ecologically significant area within the broader landscape. The USACE’s approval of the ARBOR Study referenced three key factors supporting the significance of Taylor Yard: 1) global scarcity of the area’s Mediterranean-type climate region, which covers only two percent of the Earth’s surface, but accounts for twenty percent of its plant species; 2) its location within one of Conservation International’s thirty-five global biodiversity loss hotspots (the California Floristic Province); and 3) its location on the Pacific Flyway, an important international destination for birds protected by the federal Migratory Bird Treaty Act. In 2016, US Representative Adam Schiff asked Congress to approve an expanded Rim of the Valley Special Resource Unit of the National Park Service that would include the LA River where it flows along the site.

The G2 site is the last remaining piece of the original 250+ acre Taylor Yard railroad complex, operated for rail use since the late 1800s. Union Pacific Railroad sold all of the other parcels for non-rail uses, including two parcels owned by State Parks (the Bowtie site on the riverbank upstream) and the Rio de Los Angeles State Park inland from the G2 parcel fronting San Fernando Road. Union Pacific Railroad removed all former rail tracks and structures except for a few remaining small structures, including an approximately 100-foot diameter circular concrete structure. The site is currently under the oversight of the State Department of Toxic Substances Control (DTSC) that has approved a Remedial Action Plan to guide the site’s cleanup.

The City purchased the property to achieve long-standing local, state and federal goals to provide publicly accessible, river-adjacent parkland in communities that have been historically-underserved in terms of access to nature, open space, parks, and recreation. Converting the former railyard into a public park will provide the first direct LA River access for the communities of Glassell Park and Cypress Park since the USACE channelized the river in the 1930s.

The primary access to the G2 parcel is via a road from San Fernando Road that passes under the existing Metro/Metrolink rail tracks. Casitas Avenue to Kerr Street would accommodate secondary access, but would require crossing the State Parks’ Bowtie parcel. The proposed project’s planning process will involve coordination with Metro/Metrolink and State Parks to ensure safe public access to/from the site and the LA River.

Project History: The Conservancy has been involved in planning for the LA River Greenway since the early 1990s. The Greenway is a vision of the riverbank as a continuous 51-mile active transportation and recreational corridor, becoming a spine to the larger bike and pedestrian networks within the County and river-adjacent cities. The focus of Conservancy involvement has been habitat restoration and improved trail connections to the coast. Over the years, the Conservancy has produced two strategic reports (habitat/recreation project opportunities and wetland profiles/restoration opportunities) regarding the LA River, and has funded several conceptual plans/feasibility studies and three acquisitions. The Conservancy has also worked

collaboratively with other state agencies on LA River projects, including the Lower Los Angeles and San Gabriel Rivers and Mountains Conservancy (RMC), the SMMC, and State Parks.

In October 1998, the Conservancy funded a study focusing on the feasibility of a multi-objective flood control and wetland restoration project at Taylor Yard. The Taylor Yard Multiple Objective Feasibility Study, completed in June 2002, identified four alternatives that included flood storage, habitat restoration, recreation, water treatment, and environmental education. The proposed project is consistent with the Conservancy's 2002 Taylor Yard Multiple Objective Feasibility Study and will advance implementation of recommendations from this study.

In 1999, State Parks received an appropriation from the Legislature to develop a Los Angeles River Parkway. In 2001, State Parks purchased its first piece of the future state park, the 41-acre Parcel D at Taylor Yard (now Rio de Los Angeles State Park). State Parks then acquired the "Cornfield" property (now Los Angeles State Historic Park) in 2001 and Taylor Yard Parcel G1 in 2003. In 2004, the Conservancy entered into an interagency agreement with State Parks for planning and technical services for the "Taylor Yard and Cornfield State Park" sites. In 2006, the Conservancy produced another report focusing on Taylor Yard, the Taylor Yard Parcel G-2 Upland Restoration Conceptual Plan Alternatives study. The study identified interim restoration concepts for G2. The proposed project will build on the G-2 study.

PROJECT FINANCING

Coastal Conservancy	\$2,000,000
Project Total	\$2,000,000

The expected source of funding for this authorization is the fiscal year 2016/17 appropriation to the Conservancy from the "Water Quality, Supply, and Infrastructure Improvement Act of 2014" (Proposition 1, Division 26.7 of the Water Code, § 79700 *et seq.*). Funds appropriated to the Conservancy derive from Chapter 6 (commencing with Section 79730) and may be used "for multi-benefit water quality, water supply, and watershed protection and restoration projects for the watersheds of the state" (Section 79731). Section 79732(a) identifies thirteen specific purposes of Chapter 6; of those the proposed project will help achieve six as follows:

- Restore river parkways throughout the state (subsection (a)(3));
- Protect and restore aquatic, wetland and migratory bird ecosystems including fish and wildlife corridors (subsection (a)(4));
- Protect and restore urban watershed health (subsection (a)(9));
- Protect and restore coastal watersheds (subsection (a)(10));
- Reduce pollution or contamination of rivers and coastal waters, prevent and remediate contamination, and protect or restore natural system functions that contribute to water supply, water quality, or flood management (subsection (a)(11)); and
- Assist in the recovery of endangered, threatened or migratory species by improving watershed health, inland wetland restoration, or other means (subsection (a)(12)).

The proposed project was selected through the fourth-round competitive grant process under the Conservancy's *Proposition 1 Grant Program Guidelines* adopted in June 2015 (see Section 79706(a)). The proposed project meets each of the evaluation criteria in the Proposition 1 Guidelines as described in further detail in this "Project Financing" section, the "Project Summary" section above, and in the "Consistency with Conservancy's Project Selection Criteria & Guidelines" section below of this staff recommendation.

Although the City is not providing matching funds for the proposed project, the City provided \$59,315,000 to acquire the Taylor Yard G2 parcel on March 1, 2017. Of that amount, \$14,715,000 was held in a remediation escrow account to reimburse the City's soil remediation costs upon approval by the DTSC. The City also expects to enter into an agreement with the SMMC to grant the SMMC a permanent conservation easement along the river-edge of the site that will accommodate future ecosystem restoration consistent with the USACE ARBOR Study. In order to purchase the conservation easement and accommodate near-term public access to the LA River via the site, the SMMC is seeking a \$25 million grant from the WCB. The City and its partners are committed to investing in the Taylor Yard River Park project and are already making strides toward funding the recommendations of the Implementation Plan.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project will be undertaken pursuant to Chapter 3 of Division 21 of the Public Resources Code regarding funding feasibility studies and plans (Section 31111), Chapter 5.5 regarding improving and protecting coastal and marine water quality and habitats (Section 31220) and Chapter 9 regarding public access (Sections 31400 *et seq.*).

Section 31111 permits the Conservancy to award grants to public agencies and nonprofit organizations for the purpose of funding and undertaking plans and feasibility studies. Consistent with this section, the proposed project is a grant to the City to develop the Implementation Plan for the Taylor Yard River Park on the LA River.

Section 31220(a) permits the Conservancy to provide grants for coastal watershed and coastal water quality, sediment management, and resources protection projects, if the projects meet one or more of the objectives detailed in Section 31220(b). Subsections (1), (6) and (8) of Section 31220(b) specifically authorize projects that reduce contamination of waters within the coastal zone; acquire, protect, and restore coastal wetlands, riparian areas, floodplains, and other sensitive watershed lands, including watershed lands draining to sensitive coastal or marine areas; and provide for public access compatible with resource protection and restoration objectives. The Implementation Plan for the Taylor Yard River Park will include remediation of the site, protection and restoration of floodplain and riparian habitat area, and public access compatible with resource protection and restoration objectives.

As also required by Section 31220(a), Conservancy staff has consulted with the State Water Resources Control Board in the development of the project or grant to ensure consistency with Chapter 3 (commencing with Section 30915) of Division 20.4 of the Public Resources Code. In addition, consistent with Section 31220(c) the proposed project will include a monitoring and evaluation component and is consistent with regional, local or State watershed management and

water quality plans or programs, as described in the “Consistency with Local Watershed Management Plan/State Water Quality Control Plan” section, below.

Section 31400 directs the Conservancy to have a principal role in the implementation of public accessways to and along the state’s coastline. Section 31400.1 authorizes the Conservancy to award grants to a public agency for purposes of developing, operating, or managing lands for public access purposes to and along the coast. Consistent with this section, the proposed project will serve greater than local needs as part of the LA River Greenway connecting to the California Coastal Trail. Both the Greenway and the Coastal Trail are attractions for residents and visitors from all parts of the city, county, state and beyond.

Section 31409 states that the Conservancy “may award grants and provide assistance to...public agencies to establish and expand those inland trail systems that may be linked to the California Coastal Trail.” The LA River Greenway is part of the California Coastal Trail and the proposed project will be a critical connector in this trail system offering the first opportunity for direct access to the LA River in historically-underserved communities.

**CONSISTENCY WITH CONSERVANCY’S 2013-2018 STRATEGIC PLAN
GOAL(S) & OBJECTIVE(S), AS REVISED JUNE 25, 2015:**

Consistent with **Goal 2, Objective E**, the Implementation Plan will include design of public access trails that will connect to the LA River Greenway trail system ultimately connecting inland, underserved populations to the coast.

Consistent with **Goal 3, Objective A**, the Implementation Plan will develop inland waterfront revitalization plans that increase accessibility, create more inclusive access opportunities, promote excellence and innovation in urban design, enhance cultural and historic resources, and that are resilient to a changing climate.

Consistent with **Goal 4, Objective A**, the Implementation Plan will result in permanent conservation and restoration of up to 30 acres of habitat in an area prioritized for ecosystem restoration and by the City, state, and federal agencies, and thus, protect a significant coastal and watershed resource property.

Consistent with **Goal 5, Objectives A and C**, the Implementation Plan will (A) develop plans to restore and enhance coastal habitats, including stream corridors by restoring native riparian vegetation and wetlands and (B) preserve and enhance coastal watersheds and floodplains by restoring natural floodplain functions.

Consistent with **Goal 9, Objective B**, the Implementation Plan will result in a project that will include interpretive or educational displays and exhibits related to coastal, watershed, and ocean-resource education and climate change.

**CONSISTENCY WITH CONSERVANCY'S
PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

Required Criteria

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Promotion and implementation of state plans and policies:**
 - a. *California Water Action Plan.* The proposed project will result in a project that helps achieve California Water Action Plan Action #2 by increasing integrated water management across all levels of government because the project will fulfill City, County, State, and Federal water management priorities simultaneously.
 - b. *California @ 50 Million: The Environmental Goals and Policy Report.* The proposed project will advance the following recommendations of the Report, consistent with State planning priorities of AB857: Preserve and Steward the State's Lands and Natural Resources by: increasing ecosystem services and biodiversity, increasing resilience of natural systems to recover from disruption, and promoting the use of "green infrastructure" to lessen environmental impacts of development and to provide greater protection from natural disturbances. Build Sustainable Regions that Support Healthy, Livable Communities by: investing in sound infrastructure that is consistent with the state's long-term environmental goals (specifically that will benefit disadvantaged communities) and incorporating and investing in active transportation projects, such as walking and biking infrastructure, including safe-routes-to schools. ; Build Climate Resilience into All Policies by building resiliency into the planning processes. And Improve Coordination Between Agencies and Improve Data Availability by creating an Implementation Team and Public Engagement process, the Implementation Plan will create a culture of collaboration through institutional and procedural means and leveraging and linking state funding opportunities (e.g., State Parks, Wildlife Conservation Board with City and other funding).
 - c. *CA Climate Adaptation Strategy: Safeguarding California.* The proposed project is consistent with this 2014 Plan and its 2016 Implementation Action Plans because the proposed project will advance the following strategies: 1. Biodiversity and Habitat by developing management practices to help safeguard species and ecosystems from climate risks by improving habitat connectivity, protecting climate refugia, and implementing adaptive management studies to refine conservation approaches, by supporting environmental stewardship across sectors by promoting nature-based solutions for adapting to climate risks and creating support tools to prioritize conservation activities, by improving understanding of climate risks to biodiversity and habitats by completing habitat and vegetation mapping, refining regional connectivity analyses, and conducting additional species and habitat vulnerability analyses; and by creating and maintaining partnerships that support biodiversity

conservation and promote public education and outreach. 5. Public Health by promoting and expanding urban greening and the use of green infrastructure as part of cooling strategies in public and private spaces, and by supporting active transportation measures through development of pedestrian and bicycle infrastructure and non-infrastructure programs and approaches. And, 6. Water by preparing California for flooding by reconnecting rivers to their floodplains, rehabilitating upper watershed source areas, and providing more natural floodplain features and functions that slow, spread, capture, and/or infiltrate floodwaters throughout a watershed.

- d. *California Wildlife Action Plan*. The proposed project will result in a project within the Southern California Coast Ecoregion and will achieve some of the Plan’s targeted restoration of American Southwest Riparian Forest and Woodland, Valley Foothill Riparian and California Grassland and wetland marsh wildlife habitat.
 - e. *California Aquatic Invasive Species Management Plan*. The proposed project will result in a project that will remove non-native invasive species and replace them with native species. In particular, project implementation will involve a riparian connection to the LA River and will require long-term removal and monitoring of *Arundo donax* that is identified in the Plan as a notable threat.
4. **Support of the public:** The proposed project enjoys broad support from the federal to local community level, including U.S. Congressman Adam Schiff, Senate President pro Tem Kevin De León, Assemblymember Jimmy Gomez, Mayor Eric Garcetti, City Councilmember Cedillo, City Councilmember O’Farrell, National Park Service, California State Parks, Santa Monica Mountains Conservancy, Mountains Recreation and Conservation Authority, Friends of the Los Angeles River (FoLAR), The Nature Conservancy, The Trust for Public Land, and Urban Semillas.
 5. **Location:** The proposed project is located within the Cypress Park community of the City outside of the coastal zone. The site is on the eastern bank of the LA River and will have beneficial impacts on the coastal watershed system and ultimately on the coastal environment downstream where the river meets the Pacific Ocean. The proposed project will also plan for a segment of the Los Angeles River Greenway that links to the California Coastal Trail.
 6. **Need:** Conservancy funding is needed in order to develop the Implementation Plan so that the Taylor Yard River Park project will be ready for the next phase for which implementation funds are already being sought. As discussed in the “Project Financing” section above, the City provided funds for the G-2 property acquisition and is working with other project partners to seek funding for critical next steps, including protection of the edge of the property along the river under a conservation easement as well as development of the site for near-term river access for recreational purposes while the remainder of the site is remediated. Without Conservancy funds, the proposed project will be delayed and the possibility of near-term public access will be pushed out while the City seeks other funds for planning.
 7. **Greater-than-local interest:** The LA River Greenway is a popular recreation area for local residents as well as visitors from around the state and beyond. In addition, the proposed project is located within one of Conservation International’s thirty-five global biodiversity

loss hotspots (the California Floristic Province) and on the Pacific Flyway, an important international destination for birds protected by the federal Migratory Bird Treaty Act.

8. **Sea level rise vulnerability:** The proposed project site is located more than twenty miles inland of the coast and is not vulnerable to sea level rise.

Additional Criteria

10. **Resolution of more than one issue:** The Implementation Plan will result in a project that will restore functional riparian habitat and provide the first direct access to the river and new parkland in a historically underserved community in Los Angeles.
11. **Leverage:** See the “Project Financing” section above.
14. **Readiness:** The City is ready to undertake the proposed project immediately.
15. **Realization of prior Conservancy goals:** See “Project History” section above.
17. **Cooperation:** The proposed project is the next phase in a longstanding cooperative effort to restore Taylor Yard. The City will convene a project team of key project partners, including the Conservancy, the SMMC, State Parks, Metro, Metrolink, USACE, various non-governmental organizations (NGOs), and representatives of applicable elected officials.
18. **Vulnerability from climate change impacts other than sea level rise:** Currently, the proposed project site is adjacent to but not connected to the LA River and is contaminated by past industrial use supporting minimal native vegetation. The Implementation Plan will result in a project that will restore native riparian vegetation and wetlands, enhance biological diversity in one of 35 global biodiversity loss hotspots (the California Floristic Province), and restore natural floodplain functions. All of these will serve to attenuate the impacts of climate change on the urban riverfront, including habitat loss, degraded water quality, diminished water supply and increasing temperatures.
19. **Minimization of greenhouse gas emissions:** The proposed project is a planning project, that, when implemented, will involve components designed to sequester carbon.

CONSISTENCY WITH LOCAL WATERSHED MANAGEMENT PLAN/ STATE WATER QUALITY CONTROL PLAN:

The Implementation Plan will result in restoration on the Taylor Yard G2 site. Restoration of the site has been on the priority list of the Greater Los Angeles Integrated Regional Water Management Plan and will help implement the 2015 Enhanced Watershed Management Program (EWMP) for the Upper Los Angeles River Watershed.

COMPLIANCE WITH CEQA:

The proposed project, preparation of the Implementation Plan, is statutorily exempt from review under the California Environmental Quality Act pursuant to 14 California Code of Regulations Section 15262, in that it involves only planning studies and feasibility analyses for possible future actions which have not yet been approved, adopted, or funded. As required by Section 15262, the proposed planning project will consider environmental factors.

Additionally, the proposed project includes installation of fencing and signage that will ensure public safety and inform visitors in the interim through the planning phase. Section 15303(e) categorically exempts construction of limited numbers of new, small facilities or structures, including accessory (appurtenant) structures such as signs and fences.

Upon approval, staff will file a Notice of Exemption for this project.