

COASTAL CONSERVANCY

Staff Recommendation  
September 28, 2017

**SOUTH BAY SALT POND RESTORATION PROJECT  
PHASE 2 IMPLEMENTATION:  
HABITAT TRANSITION ZONE AT RAVENSWOOD**

Project No.: 02-070-05  
Project Manager: Brenda Buxton

**RECOMMENDED ACTION:** Authorization to disburse up to \$500,000 to Save San Francisco Bay Association for creating habitat in approximately 10 acres of transition zones between tidal marsh and upland slopes in the Ravenswood Ponds as part of Phase 2 of the South Bay Salt Pond (Sbsp) Restoration Project.

**LOCATION:** Ravenswood Ponds, San Francisco Bay, South of the San Mateo Bridge in San Mateo County (Exhibit 1)

**PROGRAM CATEGORY:** San Francisco Bay Area Conservancy

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**EXHIBITS**

- Exhibit 1: [Project Location Map](#)  
Exhibit 2: [Phase 2: Ravenswood Ponds Proposed Actions](#)  
Exhibit 3: [May 26, 2016 South Bay Salt Pond Restoration Project Phase 2 Implementation staff recommendation](#)  
Exhibit 4: [Project Letters](#)

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**RESOLUTION AND FINDINGS:**

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31160 – 31165 of the Public Resources Code:

“The State Coastal Conservancy authorizes the disbursement of up to \$500,000 (five hundred thousand dollars) to Save San Francisco Bay Association (Save the Bay) to design, propagate, translocate, and monitor native plant species in order to vegetate habitat transition zone constructed as part of Phase 2 of the South Bay Salt Pond Restoration Project at the Ravenswood Ponds (Exhibit 2), as well as organize the volunteer implementation program subject to the following conditions:

1. Prior to the disbursement of any Conservancy funds for the project, Save the Bay shall submit for the review and approval of the Conservancy’s Executive Officer: a work program

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for the project site including schedule and budget, the names of any contractors it intends to use to complete the improvements at that site, and a sign and acknowledgement plan.

2. Prior to commencing the project, Save the Bay shall enter an agreement with the landowner, the US Fish and Wildlife Service, which provides access to the property and designates entities responsible for operations and maintenance.
3. In carrying out the project, Save the Bay shall comply with all applicable mitigation and monitoring measures that are identified in the *Final Environmental Impact Statement/Report, South Bay Salt Pond Restoration Project – Phase 2* and in the *2007 South Bay Salt Pond Restoration Project Final Environmental Impact Statement/Environmental Impact Report* or that are required by any permit or approval.”

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 4.5 of Division 21 of the Public Resources Code, regarding the Conservancy’s mandate to address the resource and recreational goals of the San Francisco Bay area.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Conservancy considered and certified the Final Environmental Impact Statement/Report, South Bay Salt Pond Restoration Project – Phase 2 (Final Phase 2 EIS/R) and made findings pursuant to its duties as a lead agency under the California Environmental Quality Act (CEQA) on May 26, 2016.
4. The proposed project in the Ravenswood Ponds is consistent with the project described in the Final Phase 2 EIS/R. The Final Phase 2 EIS/R analyzed impacts related to the creation of the habitat transition zone. The addition of plants to these habitat transition zones after they have been created is environmentally beneficial for reasons detailed in the accompanying staff recommendation. No further environmental analysis is required because the proposed project does not create any new significant environmental effects or substantially increase the severity of previously identified environmental effects.
5. Save the Bay is a nonprofit organization existing under section 501(c)(3) of the U.S. Internal Revenue Code, and whose purposes are consistent with Division 21 of the Public Resources Code.”

**PROJECT SUMMARY:**

Conservancy approval of this authorization would allow Save San Francisco Bay Association (Save the Bay) to undertake a critical part of Phase 2 of the South Bay Salt Pond Restoration Project: planting of approximately 10 acres of upland transition zones adjacent to the restored tidal wetlands at the Ravenswood Ponds (Exhibit 2).

The Conservancy launched Phase 2 on May 26, 2016 with the certification and adoption of the *Final Environmental Impact Statement/Report, South Bay Salt Pond Restoration Project – Phase*

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2 (Final Phase 2 EIS/R) and authorization of up to \$13,727,170 for Duck Unlimited, Inc. (DU) for construction of Phase 2 restoration at the Mountain View and Ravenswood Ponds. While DU will construct the habitat transition zones<sup>1</sup>, the available funding does not include sufficient funds for planting all of the habitat transition zones proposed at the Mountain View and Ravenswood sites. Save the Bay seeks to collaborate with DU and the US Fish and Wildlife Service (US FWS), the landowner, on completing the restoration work at the Ravenswood Ponds. DU is currently working on final designs for the Ravenswood site and will coordinate with Save the Bay on the vegetation work. Save the Bay will work on the approximately 10-acre habitat transition zone along the edge of Bedwell Bayfront Park (a former landfill that has been converted into a community park). The area adjacent to Bedwell Park is a priority for Save the Bay because it presents excellent opportunities for public education and outreach and will be easily accessible by volunteers. If there were project cost savings, Save the Bay would expand the vegetation program to the adjacent habitat transition zone constructed between Ponds R4 and R3.

Habitat transition zones are an important component of the SBSP Restoration Project's Phase 2 plan. These are broad, gently sloping areas, usually constructed in front of a berm or engineered levee, that seek to re-create the grasslands and scrub that used to be found along the edge of San Francisco Bay. Many wetland areas in the Bay currently have abrupt transitions to rip rap, steep berm slopes, or parking areas and development. Without building these transition zones into the project, there will be few areas for marsh-dependent species to find cover during storms or extreme high tides, or to forage on upland vegetation. Fully vegetated habitat transition zones are part of the goal to restore complete wetland systems that include many interconnected habitat types from the intertidal to upland habitats. In addition, upland transition zones are part of the SBSP Restoration Project's climate change adaptation strategy because they will allow the marsh plain to migrate upslope as seas rise.

Save the Bay brings extensive experience growing locally collected native plants and recruiting volunteers to plant along the edges of sloughs and wetlands in San Francisco Bay. In addition to improving the habitat in these uplands areas, Save the Bay's volunteer programs provide a hands-on means to inform Bay Area adults and children about ecology, climate change, and restoration efforts in San Francisco Bay. Since 2001, Save the Bay has received five grants from the Conservancy for planting projects adjacent to existing and newly restored marshes around San Francisco Bay. Thousands of volunteers have successfully collected seeds, propagated plants, vegetated sites, weeded, and cleaned up trash through Save the Bay's programs.

**SBSP Restoration Project History:** These are the second set of actions undertaken by the SBSP Restoration Project in this pond complex. In 2010, as part of the SBSP Restoration Project Phase 1, the US FWS enhanced shallow water habitats in Pond SF2.

In the late nineteenth and early twentieth centuries much of the tidal marshes that surrounded San Francisco Bay south of the San Mateo Bridge (Exhibit 1) were converted to salt evaporation ponds, contributing to the total estimated 85 percent loss of the historic tidal marshes in the San Francisco Bay-Delta Estuary. Although dramatically different from 150 years ago, the South

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<sup>1</sup> Habitat transition zones are also referred to as "ecotone" because they serve as the transition between two different ecological areas or as "horizontal levees" because unlike traditional 3:1 levee slopes they are broad gentle slopes that improve the flood protection features of engineered levees by absorbing wave energy

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Bay's wetland habitats (salt ponds, tidal marshes, sloughs, mudflats, and open bay) are used by large populations of waterfowl and shorebirds, harbor seals, numerous fish species, and by a number of threatened and endangered species, including the California Ridgway's Rail, California Black Rail, California Brown Pelican, California Least Tern, Western Snowy Plover, Salt Marsh Harvest Mouse, and Steelhead Trout. The 2003 acquisition of 15,100 acres of salt evaporation ponds created the South Bay Salt Pond Restoration Project, which will transform southern San Francisco Bay by restoring tidal marsh and enhancing the remaining pond habitats for the benefit of these species.

**SBSP Restoration Project Site Description:** Save the Bay is proposing to work in the newly constructed earthen slopes in the Ravenswood Ponds (Pond R4) (Exhibit 2). In the Ravenswood pond complex, Phase 2 will create a 355-acre mosaic of tidal wetlands, upland transition zone, and managed pond habitats. In the 295-acre Pond R4, the project will breach levees, install ditch blocks, and dredge pilot channels to restore tidal flows and construct approximately 15 acres of gently sloping upland transition zone along the edge of an existing landfill (Bedwell Bayfront Park). The levee between R3 and R4 will be raised to reduce flooding risks and will include a habitat transition zone. In addition, the project will install water control structures to improve shallow water habitat in Ponds R3, R5, and S5 for snowy plovers, migratory shorebirds and waterfowl. A half mile of trail will be constructed with interpretive platforms and signage.

**PROJECT FINANCING**

Previous Conservancy authorization	\$1,205,296
Coastal Conservancy (this authorization)	\$500,000
Total Conservancy Funding for Ravenswood Ponds	\$1,705,296
US Environmental Protection Agency	\$956,755
CA Department of Fish and Wildlife Prop. 1	\$750,000
NOAA Coastal Resiliency (DU)	\$1,500,000
<b>Total Ravenswood Ponds Phase 2</b>	<b>\$4,912,051</b>

The proposed award of \$500,000 to Save the Bay would come from the Conservancy's FY 2016 appropriations from the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Proposition 1, Water Code § 79700 et seq.). Funds appropriated to the Conservancy derive from Chapter 6 (commencing with § 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 identifies specific purposes of Chapter 6 and includes: protect and restore aquatic, wetland and migratory bird ecosystems, including fish and wildlife corridors; protect and restore coastal watersheds, including, but not limited to bays, marine estuaries, and nearshore ecosystems; and assist in the recovery of endangered, threatened or migratory species by improving watershed health, instream flows, fish passage and coastal or inland wetland restoration.

As required by Proposition 1, the proposed project provides multiple benefits. By working to restore the upland habitats adjacent to salt marshes, the project will significantly improve ecological and hydraulic function of the South Bay's wetlands. The proposed project will help

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achieve the three Chapter 6 purposes identified above by helping to restore complete wetland ecosystems for fish and other wildlife and assisting in recovery of endangered, threatened, and migratory species.

In accordance with Section 79707(b), which requires agencies to prioritize “projects that leverage private, federal, or local funding or produce the greatest public benefit,” this project includes matching funds. To date, for the Ravenswood Ponds project, the Conservancy has secured \$750,000 from the California Department of Fish and Wildlife (CDFW) and \$956,755 from the US EPA. To address increased cost estimates developed since the May 26, 2016 authorization, the Conservancy’s construction grantee for the project, DU, applied for and was awarded \$1,500,000 from the NOAA Coastal Resiliency Grant Program.

In addition to cash matching funds, Save the Bay estimates that there will be 10,945 hours of volunteer labor for the project valued at over \$300,000 (using the Independent Sector’s 2015 estimate of the value of volunteer time in California at \$27.59/hour.)

Save the Bay’s proposal for the Ravenswood Ponds was selected through a competitive grant process under the Conservancy’s *Proposition 1 Grant Program Guidelines* adopted in June 2015 (“Prop 1 Guidelines”). (See § 79706(a)). The proposed grant meets each of the evaluation criteria in the Prop 1 Guidelines as described above in this “Project Financing” section, and in the “Promotion and implementation of state plans and policies” discussion under the “Consistency with Conservancy’s Project Selection Criteria & Guidelines” section of this report.

**CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:**

This project will be undertaken pursuant to Chapter 4.5 of the Conservancy’s enabling legislation, Public Resources Code Sections 31160-31165, to address resource goals in the San Francisco Bay Area.

The SBSP Restoration Project is within the nine-county Bay Area as required under Section 31162 of the Public Resources Code.

Under Section 31162(b), the Conservancy may act to protect, restore, and enhance natural habitats and connecting corridors, watersheds, scenic areas, and other open-space resources of regional significance. This authorization would specifically provide for the creation of approximately 10 acres of vegetated habitat transition zones in the former salt-evaporation ponds in the Ravenswood Pond Complex, helping to complete significant components of a wetland restoration project of national significance.

Under Section 31162(d), the Conservancy may act to promote, assist, and enhance projects that provide open space and natural areas that are accessible to urban populations for recreational and educational purposes. The implementation of this project will bring volunteers from all over the Bay to have a hands-on experience helping to restore habitat along the Bay’s edge.

The project is consistent with Sections 31163(a) and (b), directing the Conservancy to participate in and support interagency actions and public/private partnerships in the San Francisco Bay Area to implement long-term resources and outdoor recreational goals. The SBSP Restoration Project is a partnership between many public agencies, nonprofit organizations, volunteer stakeholders, and academic and government scientific researchers.

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Consistent with Section 31163(c), the project meets the following criteria: (1) is supported by adopted regional plans (*San Francisco Bay Plan, Baylands Ecosystem Habitat Goals Report (1999)* pp. 97, 126-139, *Baylands Goals Update (2015)* pp. 198, 203, and the *San Francisco Basin (Region 2) Water Quality Control Plan (June 29, 2013)* pp. 2-2 and 4-92), (2) is multijurisdictional (involves multiple agencies) and serves a regional constituency (the restoration component will facilitate nationally and regionally significant wetland restoration efforts), (3) can be implemented in a timely way, (4) provides opportunities for habitat benefits that could be lost if the project is not quickly implemented, and (5) includes matching funds from other sources of funding as described above in the “Project Financing” section.

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

Consistent with **Goal 11, Objective D** of the Conservancy’s 2013-2018 Strategic Plan, the proposed project will create approximately 10 acres of habitat transition zone in order to enhance a larger wetland restoration project.

**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:** The restoration, flood protection and adaptive management actions of the SBSP Restoration Project will promote and implement several state plans including:
  - *California State Wildlife Action Plan 2015 Update (SWAP 2015 Update)*. The actions proposed as part of the SBSP Restoration Project Phase 2, including vegetation of habitat transition areas, will significantly contribute to the SWAP 2015 Update goals for the Bay-Delta and Central Coast region by 2025 to increase by 5% from 2015 levels the following: acres of salt-marsh habitat, acres with desired structural diversity, areas connected, and acres of habitat providing high-tide refugia. This project will accomplish this by increasing the structural (topographic and botanical) diversity by vegetating ecotone that will provide high-tide refugia and areas for salt-marsh migration with rising seas. The proposed actions are consistent with the plan’s objective to provide support for the Coastal Conservancy and others to implement established priorities and conservation goals for San Francisco Bay and with the conservation action to “develop, fund, and implement...the South San Francisco Bay Salt Pond Restoration Project” (p.5.3-48).

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- *CA Climate Adaptation Strategy/Safeguarding California: Reducing Climate Risk Plan (July 2014)*. The plan identifies Actions Needed to Safeguard Biodiversity and Habitats including #2 “Implement adaptive management studies to refine approaches for conserving biodiversity, especially for species and communities vulnerable to climate change” such as coastal wetlands.

- *California Water Action Plan (2014)*. The project helps achieve Goal #4, Protect and Restore Important Ecosystems as it is one of the 10 “large-scale habitat projects along the California coast in strategic coastal estuaries to restore ecological health and natural system connectivity, which will ... help defend against sea level rise.”

- *California @ 50 Million: The Environmental Goals and Policy Report (2013 Draft)*. Key Action #3 of the “Preserve and Steward State Lands and Natural Resources” calls for building resilience in natural systems and specifically points out that wetlands “provide important carbon sequestration opportunities for the state.”

4. **Support of the public:** Save the Bay’s restoration efforts are supported as evidenced by the 5,000 volunteers participating in their programs each year. In addition, Representative Jackie Speier, State Senator Jerry Hill, San Mateo County Supervisor Dave Pine, the US Fish and Wildlife Service, Facebook, and the San Francisco Bay Regional Water Quality Control Board have written letters of support for Save the Bay’s proposal (Exhibit 4).
5. **Location:** The proposed project is located in the southern San Francisco Bay Area, within San Mateo County, consistent with Section 31162 of the Public Resources Code.
6. **Need:** Approximately 85 percent of the tidal marsh in San Francisco Bay has been lost since the Gold Rush, leading to dramatic losses of fish and wildlife, and areas adjacent to former marshes extensively urbanized. As called for in the U.S. Fish and Wildlife Services’ Tidal Marsh Recovery Plan habitat transition zones are needed in order to aid in the recovery of marsh-dependent species. Conservancy funding is needed to provide additional for vegetation of the habitat transition zones.
7. **Greater-than-local interest:** Vegetation of habitat transition zones will aid in the recovery of several threatened or endangered species, including the California Ridgway’s Rail and Salt Marsh Harvest Mouse, and will make the SBSP Restoration Project, the largest wetland restoration project on the west coast of the United States, more resilient to climate change.
8. **Sea level rise vulnerability:** Due to their location, all tidal wetland restoration projects can be vulnerable to sea-level rise impacts. However, by creating wide gently sloping transitions between the marsh plain and adjacent development, habitat transition zones make a salt marsh more resilient to sea-level rise by absorbing wave energy and allowing for upslope marsh migration. This project, therefore, is a direct adaptation to sea-level rise.

**Additional Criteria**

9. **Urgency:** Save the Bay needs to plan, collect seed, and grow plants at least a year before translocation can occur. Save the Bay needs to start this fall in order to be ready when construction of the habitat transition zone is completed.

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10. **Resolution of more than one issue:** Vegetating the habitat transition zones will provide for refugia habitat wildlife, improved flood control, and upslope marsh migration, and help control invasive species.
11. **Leverage:** See the “Project Financing” section above.
11. **Innovation:** The creation of habitat transition zones is a recent innovation in wetland restoration and Phase 2 construction and vegetation of these zones will serve as a model for other projects around the Bay Area and beyond.
13. **Realization of prior Conservancy goals:** This project builds on the Conservancy’s participation in the development of the *San Francisco Baylands Habitat Goals Report* and its 2015 *Baylands Goals Science Update*, which has goals, objectives, and recommendations for restoration in San Francisco Bay. This authorization complements the May 26, 2016 authorization by the Conservancy to support and implement Phase 2 of the SBSP Restoration Project.
15. **Cooperation:** The Conservancy is facilitating the SBSP Restoration Project’s long-term planning, working closely with CDFW and USFWS. The Conservancy, along with other state and local agencies are cooperatively funding the restoration planning. In addition, an extensive group of stakeholders, including local, state, and federal agencies, nongovernmental organizations, special districts, utilities, and the general public, have participated in planning of both phases of this restoration project.

**CONSISTENCY WITH SAN FRANCISCO BAY PLAN:**

The project is consistent with the following policies of BCDC's San Francisco Bay Plan (Reprinted March 2012):

**Part III: The Bay as a Resource**

Fish, Other Aquatic Organisms and Wildlife (p. 16)

- To assure the benefits of fish, other aquatic organisms and wildlife for future generations, to the greatest extent feasible, the Bay’s tidal marshes, tidal flats, and subtidal habitat should be conserved, restored and increased.

Tidal Marshes and Mudflats (p. 23-24)

- Where a transition zone does not exist and it is feasible and ecologically appropriate, shoreline projects should be designed to provide a transition zone between tidal and upland habitats.
- Where feasible, former tidal marshes and tidal flats that have been diked from the Bay should be restored to tidal action in order to replace lost historic wetlands or should be managed to provide important Bay habitat functions, such as resting, foraging and breeding habitat for fish, other aquatic organisms and wildlife.
- Any ecosystem restoration project should include clear and specific long-term and short-term biological and physical goals, and success criteria, and a monitoring program to assess the sustainability of the project.

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**COMPLIANCE WITH CEQA:**

In order to comply with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), USFWS and the Conservancy prepared the *South Bay Salt Pond Restoration Project, Final Environmental Impact Statement/Report, Phase 2, April 2016* (Final Phase 2 EIS/R) to evaluate the potential environmental impacts of Phase 2. The Final Phase 2 EIS/R was certified by the Conservancy on May 26, 2016 (see Exhibit 3).

The Final Phase 2 EIS/R is a project-level environmental impact assessment addressing the specific components and implementation of Phase 2. The May 26, 2016 staff recommendation summarized the planning and development of the Final Phase 2 EIS/R and the mitigation measures required to reduce Phase 2 project impacts to a less than significant level. It also included a statement of overriding consideration for those impacts that could not be reduced to a less-than-significant level. The discussion below, however, focuses only on those sections relevant to the proposed action in this staff recommendation: active vegetation of the habitat transition zones in the Ravenswood Ponds.

The Final Phase 2 EIS/R describes the creation of habitat transition zones with the beneficial reuse of material from uplands and other sources. The Final Phase 2 EIS/R notes that these transition zones are specifically called out in the U.S. Fish and Wildlife Services' *Tidal Marsh Recovery Plan* and the *Baylands Ecosystem Habitat Goals Science Update 2015* because gradual transitions from wetland areas to uplands are largely missing in the current landscape of the South Bay. The goals of providing habitat transition zones as part of Phase 2 construction are to reduce the vulnerability of terrestrial marsh species during high tides and storms, expand habitat for a variety of special status plant species, and provide space for marshes to migrate upslope over time as sea-level rise occurs (p. 1-5).

**Creation of Habitat Transition Zone Impact Analysis**

Although the creation of habitat transition zones would affect jurisdictional wetlands and other waters by placing fill in the ponds, the Final Phase 2 EIS/R found the impact to be less than significant under CEQA and beneficial under NEPA (**Phase 2 Impact 3.5-24 Potential impacts to jurisdiction wetlands or waters**). The fill areas are relatively small compared to the amount of tidal marsh to be restored and the primary purpose would be to improve the quality of the habitat and increase its resiliency over time.

The only potentially significant impact related to habitat transition zones identified in the Final Phase 2 EIR/S was from truck trips bringing fill to the site. To reduce these impacts to less than significant, the Final Phase 2 EIS/R identifies **SBSP Phase 2 Mitigation Measure 3.11-1**, which requires the US FWS to coordinate with Caltrans and/or the City of Menlo Park to modify the intersection signal timing in the morning to reduce project-related delay to a level that the City does not deem significant. The Final Phase 2 EIS/R found that intersection delay increase does not result in an impact under the mitigated project condition; therefore identified impacts are reduced to a less-than-significant level.

The Final Phase 2 EIS/R describes vegetation as an essential part of the habitat transition zones because it would provide cover to tidal wetland species using the areas as refugia. After earthmoving is complete, the habitat transition zones will be bare, semi-compacted dirt slopes that will provide high ground to marsh species, but not much else. Without vegetation to create habitat complexity, marsh species fleeing storm waves or high tides are vulnerable to predation –

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as currently happens when marsh species are flushed out of marshes during high tide events. Hydroseeding and active vegetation programs are briefly described as one of the possible ways to provide this vegetative cover.

The Final Phase 2 EIS/R identified one key potential impact relating to vegetating the habitat transition zones: the potential for invasive non-native plants to colonize the project area, particularly the habitat transition zones (**Phase 2 Impact 3.5-21 Colonization by non-native *Lepidium***). Active revegetation with native plants was identified as one of the methods of preventing and controlling *Lepidium latifolium*, a species that can invade high marsh areas and lower habitat quality. The planting programs, such as the one proposed by the Save the Bay, will both provide high quality habitat and help control the spread of invasive species. Negative environmental impacts are more likely to come from *not* having an active vegetation program.

For these reasons, the Conservancy staff recommends that Conservancy find that: the proposed project in the Ravenswood Ponds is consistent with the project described in the Final Phase 2 EIS/R; the addition of plants to these habitat transition zones after they have been created is environmentally beneficial; and no further environmental analysis is required because the proposed project does not create any new significant environmental effects or substantially increase the severity of previously identified environmental effects. Upon Conservancy approval of the proposed project, Conservancy staff will file a Notice of Determination.