COASTAL CONSERVANCY

Staff Recommendation
January 19, 2012

COASTAL STREAMFLOW STEWARDSHIP PROJECT: IMPLEMENTATION

Project No. 11-059-01
Project Manager: Michael Bowen

RECOMMENDED ACTION: Authorization to disburse up to $721,231 to Trout Unlimited to implement a suite of water conservation projects to enhance and restore anadromous fish habitat in key coastal watersheds.

LOCATION: San Mateo, Santa Clara and Humboldt Counties

PROGRAM CATEGORY: Resource Enhancement

EXHIBITS

Exhibit 1: Project Location and Site Map

Exhibit 2: Staff Recommendation, April 24, 2008

Exhibit 3: Detailed Project Descriptions

Exhibit 4: Project Letters

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31111 and 31251-31270 of the Public Resources Code:

"The State Coastal Conservancy hereby authorizes the disbursement of up to seven hundred twenty-one thousand two hundred thirty-one dollars ($721,231) to Trout Unlimited to enhance and protect Pacific salmon populations and other species by implementing a suite of water conservation projects on key coastal watersheds, subject to the condition that, prior to the disbursement of funds for each project, TU shall submit for review and approval by the Executive Officer of the Conservancy:

a. A work program, including final design plans and specifications, schedule and budget for construction.

b. All contractors to be employed for the project.

c. Evidence that all necessary permits and approvals have been obtained.

d. A signing plan for the project acknowledging Conservancy funding.

e. A report demonstrating the predicted ecological efficacy of the proposed project and a plan for demonstrating its post-construction utility to the Conservancy.

Prior to the disbursement of funds for the Mattole River and Little Arthur Creek storage tank projects, TU, the landowners, and the Conservancy shall enter into recorded agreements, including operations and maintenance agreements, sufficient to protect the public interest in the projects, as required by Pub. Res. Code §31116(c)."

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 project is consistent with the current Project Selection Criteria and Guidelines.
2. The proposed authorization is consistent with the purposes and objectives of Chapter 6 of Division 21 of the Public Resources Code, regarding coastal resource enhancement projects.
3. Trout Unlimited is a non-profit organization existing under section 501(c)(3) of the Internal Revenue Service code whose purposes are consistent with Division 21 of the Public Resources Code."

PROJECT SUMMARY:

Staff recommends that the Coastal Conservancy authorize the disbursement of up to $721,231 to Trout Unlimited ("TU") to implement a suite of water conservation projects in key coastal watersheds. The proposed projects will individually and collectively improve aquatic habitat for a variety of species, primarily pacific salmon, while ensuring an adequate supply of water for agricultural and domestic water users.

TU and its partners, with the earlier support of the Conservancy, have launched an ambitious and successful program to encourage water users to change the nature of their water use operations for the benefit of instream flows. Years of negotiations and planning have proven successful, enabling TU to seek implementation funds for priority water conservation projects. TU's effort is a coastwide undertaking, but the proposed Conservancy and matching funds will be directed to the following specific projects: 1) Mattole - $273,141; 2) San Gregorio Creek - $96,706; 3) Pescadero Creek - $75,000; 4) Little Arthur Creek - $276,384.

Mattole River Headwaters: The goal of this project is to restore flow to 10.3 miles of the Mattole River Headwaters benefiting Pacific salmon populations such as coho and steelhead trout in the summer and fall by constructing: (a) one 75,000 gallon off-stream storage tank for the Mattole Elementary School, and (b) one 50,000 gallon off-stream storage tank for a construction company complex. Both the school and the construction company utilize existing water rights to divert water from the Mattole River during the dry season. The school project includes development of a forbearance agreement that will meet water security requirements specific to the school, development of an application for a water right permit that allows for storage, and installation of approximately 75,000 gallons of storage. The construction company maintains a water system for a complex of businesses and residences forming the commercial center of the village of Whitethorn Junction. This project component involves increasing water

storage capacity by 50,000 gallons to meet summer seasonal demand for a maximum 120 day dry period, installing a water security system to prevent sudden loss of water in the event of a leak, and installing a water treatment system to meet a maximum of 1,750 gpd demand. In order to minimize impacts of its operations on the watershed, the construction company has already voluntarily installed significant storage, while reducing summer withdrawals to a minimum given its current storage capacity. However, even this diversion (at least 1,000 gpd) can have significant impacts on Mattole summer flows and this project will resolve those impacts by switching the timing of diversion through an increase in winter storage. The proposed changes will not allow the diverters to increase their overall level of diversion, and will likely involve the placement of a water right dedication for instream flow (Section 1707 Dedication) upon the diversion. Doing so ensures that water that is not used by the diverter due to conservation measures is "dedicated" to staying in the water body for purposes of protecting and maintaining environmentally appropriate instream flow levels.

San Gregorio Creek: The goal of this project is to complete the planning and design for two off-stream storage projects that will result in increased streamflow in the lower portion of San Gregorio Creek in coastal San Mateo County. The first project involves an engineering evaluation of the potential to enlarge an existing off-stream pond so that the water user could reduce the rate of diversion and avoid diversions from San Gregorio Creek during the driest period of the year. It currently only provides a few weeks of storage. The plan will involve, first, a reconnaissance level engineering evaluation to assess whether enlargement might be possible. If it seems possible, TU will pursue a deeper engineering analysis to ascertain how much bigger it could be made, and at what cost. The second project involves the planning, design, and application for permits for two large off-stream ponds. This property has the largest water right and the least storage (effectively none) in the lower part of San Gregorio Creek. The objective is to shift as much of the water demand to the rainy season as possible, with constraints that may be placed on the project by land availability, water availability, and permit terms and conditions. The proposed project would benefit a variety of aquatic and terrestrial species such as Central Coast Coho salmon and steelhead, the Red Legged Frog, and the San Francisco Garter Snake, as well as migratory songbirds that benefit from healthy riparian environments.

Pescadero Creek: The goal of this project is to complete the feasibility analysis and conceptual design for at least two and possibly more demonstration off-stream storage projects that will result in increased streamflow in Pescadero Creek in coastal San Mateo County.

Following sufficient streamflow measurement and analysis of instream flow levers, TU will develop a habitat analysis that provides sufficient detail to justify water conservation measures. Following that analysis, TU will prepare and present to the Integrated Watershed Resource Program (IWRP) multiple options for enhancing dry season streamflow in Pescadero Creek.

TU has already identified preliminary candidate projects for the upper mainstem. These include reconstruction/expansion of storage at San Mateo County Memorial Park, increased storage at Redwood Glen Camp, conservation measures at the park and the camp, irrigation efficiency at the camp, and irrigation water storage at the camp. Preliminary candidate projects in the lower mainstem include irrigation water storage expansion on property newly associated with Harley

Farm and on neighboring properties, and expanding existing efforts to replace direct diversion with groundwater extraction. The listed examples have been selected on the basis of the existence of cooperating landowners and relatively large diversion capacities.

With guidance from IRWP and other stakeholders, a select group of conservation and storage projects will be advanced to design phase. Reviewers will consider fiscal, technical, procedural and other constraints and opportunities associated with the candidate projects along with the potential dry season streamflow enhancement they produce. If more than two large-scale storage projects are suggested for advancement to the design phase, additional resources may be sought.

The conceptual designs will provide the necessary level of detail for environmental review, permitting, and final design and construction.

Little Arthur Creek: The goal of this project is to maintain summer habitat through 1.6 miles of Little Arthur Creek, an Uvas Creek tributary in the Pajaro River Watershed in Santa Clara County. This goal would be achieved by (a) design and application for permits for one 10 acre-foot off-stream storage pond for a small vineyard with approximately sixteen acres of wine grapes and (b) construction of three 50,000 gallon rural residential tanks for riparian landowners. The off-stream pond project will allow the vineyard to discontinue summer diversion from the stream and offset irrigation water needs through stored winter water. In totality these water conservation projects are the highest priority projects in the watershed; the property has the largest acreage under irrigation and the least storage in the watershed, and is located at the top of the steelhead-rearing reach. Since there is very little cultivated acreage within the watershed, tanks for rural residential landowners are likely to be integral part of the solution to enhancing streamflow in Little Arthur Creek. TU staff believes the potential exists for installing tanks sufficient to cover each landowner along the entire creek, but also believes the conservation goals of the project can be achieved under the current proposal.

TU, the nation's foremost coldwater fisheries conservation organization, has 135,000 members and 500 chapters nationwide. TU has a proven track record for achieving significant water conservation victories in concert with landowners. In addition to bringing these high priority projects to a state of readiness for the Coastal Conservancy, TU has also assisted one farmer in Sonoma County in gaining an off-stream pond with other funds and has assisted another project partner (Sanctuary Forest) on successful tank projects in the Mattole Headwaters.

Having overcome significant controversy, skepticism, and procedural challenges to arrive at a state of readiness for implementation of this particular suite of projects, TU has demonstrated amply its capability of proceeding successfully with the project.

Site Description: The project sites are located in Humboldt, Santa Clara and San Mateo counties, and described in detail, below.

The Mattole River Headwaters, which is defined as the area upstream of Bridge and McKee Creeks near Whitethorn Junction in Humboldt County, is a stretch along the mainstem Mattole of about 9.4 miles. This area has the most productive and promising rearing habitat for coho salmon and steelhead in the Mattole River, which is traditionally one of the strongholds for those

species in Northern California. Dewatering during low flow periods has been identified as the primary issue for salmon and steelhead recovery in the sub-basin. Water use is split between a small number of institutional water users and irrigators, residential landscaping, and residential indoor use. Total demand in the driest months is about two-thirds of supply, or more, depending on water year.

San Gregorio Creek drains about 50 square miles of the Santa Cruz Mountains in San Mateo County. It is an important stream for steelhead and Central Coast Coho recovery. Coho were thought to be extirpated from the basin, but have been recently documented in small numbers. Summer streamflows are a critically important factor for recovery, as indicated by its status in the federal Draft Coho Recovery Plan as the stream ranked highest in threats from water diversions. It is also an adjudicated stream, meaning that utilization of existing water rights is highly constrained by a prior legal settlement. Use of water under an existing permit often entails seeking permission from a "Water Master" assigned to the basin. Lastly, San Gregorio is the location of past failed efforts to construct offstream ponds designed to increase available water supply within this adjudicated basin. Success there will represent an important signal that success is possible nearly anywhere.

Pescadero Creek has headwaters in the Santa Cruz mountains and drains an area of about 81 square miles, primarily in San Mateo County. Like San Gregorio, Pescadero hosts coho salmon and steelhead trout, in addition to many other species. Unlike San Gregorio, the lagoon is entirely within State Parks ownership and therefore offers tremendous potential for enhancement, particularly unhampered by ownership patterns through the addition of quality instream flows during low flow periods. Moreover, water demands are growing. Thus, a concerted effort for water conservation is urgent.

Little Arthur Creek is one of the last remaining "inland" central coast steelhead streams with viable runs of fish and it is vital to the recovery of the population. The 6-mile stream drains the eastern side of the Santa Cruz Mountains above Gilroy before joining Uvas Creek and then taking a U-turn to the Pajaro River, which drains to Monterey Bay. The upper part of the watershed is characterized by steep, densely forested slopes with sparse rural development. Low density residential and vineyard development increase in the valley floor. Except for the inadequacy of instream flows, Little Arthur Creek is a prime location for all freshwater life stages of steelhead. The riparian zone is mostly intact with adequate canopy, plentiful high quality instream gravels, adequate water temperatures in the upstream reaches, stable streambanks, and high quality pools. Land use is a mix of rural residential and about a half dozen small agricultural parcels of wine grapes. NMFS asked TU to apply the Conservancy-funded Coastal Streamflow Stewardship Project (CSSP) to this stream in order to address low streamflow, which they understand as "the most significant limiting factor to the Little Arthur steelhead fishery." Little Arthur Creek is important because effective rearing habitat in the Pajaro River watershed is limited to only a few tributaries (including Little Arthur), especially in drought years. NMFS has also noted that the frequency and extent of dewatering has increased since the 1970s, as the number of water diversions has increased. Aside from low streamflow, Little Arthur maintains some of the better conditions for all steelhead freshwater life history stages.

Project History: Several Conservancy projects have over the decades dealt with the challenges of balancing competing demands on instream flows with mixed success. These are discussed in

some detail in the prior CSSP staff recommendation (Exhibit 2). However, more recent efforts have proven successful.

Conservancy staff recommended a feasibility level study to the Conservancy board in April 2008, and the board authorized $600,000 of the requested $1 million. The grantee, Trout Unlimited, subsequently raised a significant amount of additional matching funding, and spent the next three years in a variety of coastal watersheds identifying the highest priority and most likely to succeed water conservation projects. Trout Unlimited engaged in extensive data collection, outreach to landowners, negotiations over possible terms for future water rights, and more. Although those efforts are not yet complete, they have shown promising results, so much so that TU is able to bring demonstrably high priority CSSP water conservation projects to a state of readiness for implementation. This staff recommendation proposes funding the first round of high priority projects identified by TU.

PROJECT FINANCING

Coastal Conservancy	**$721,231.00**
NOAA	**$67,860.00**
Witter Foundation	**$25,000.00**
Santa Clara Valley Water District	**$245,023.00**
Total Project Costs	**$1,059,114**

The anticipated source of the Conservancy's funds will be the fiscal year 2009/2010 appropriation from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84). The project is appropriate for funding under this source as these funds are available for the acquisition, enhancement, restoration, protection and development of coastal resources in accordance with Chapter 6 of the Conservancy's enabling legislation. Projects that restore natural resources are given priority if they meet one or more of the criteria specified in Pub. Resources Code § 75071. The proposed restoration project satisfies the following specified criteria: (a) Landscape/Habitat Linkages– the project will help sustain a complex riparian system which supports several threatened and endangered species as detailed in the project descriptions, above, (b) Watershed Protection – the project will contribute to long-term protection of and improvement to the water and biological quality of coastal watersheds and the near shore area of the Pacific Ocean; and (e) Non-State Matching Funds –as discussed above, NOAA, NFWF, private foundations and a water agency will provide significant non-state matching funds.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project is undertaken pursuant to Chapter 6 of Division 21, Sections 31251-31270 of the Public Resources Code, regarding enhancement of coastal resources, as follows:

Section 31251 provides that "(t)he conservancy may award grants to …nonprofit organizations for the purpose of enhancement of coastal resources that, because of…incompatible land uses, have suffered loss of natural and scenic values…." Every LCP associated with the proposed projects identifies water diversion to some degree as a threat to the protection and maintenance of sensitive habitat and species, as described in Consistency With Local Coastal Program Policies, below. Consistent with Section 31251, the proposed projects will reduce the ill-effects resulting from excessive diversion of streamflow during low flow periods in the summer and early fall. This shift in water use practices will expedite restoration of coastal zone resources that will benefit the anadromous fish that rely on both the coastal and upstream habitats for their survival.

Section 31251.2(a) provides that "[i]n order to enhance the natural or scenic character of coastal resources within the coastal zone, the Conservancy may undertake a project or award a grant…to enhance a watershed resource that is partly outside of the coastal zone…." Consistent with this section, the proposed projects will serve to advance enhancement of salmonid habitat in locales that are not within the coastal zone, but that have benefits to pacific salmon that depend on habitat conditions both within and outside of the coastal zone. Also pursuant to this section, DFG and other local public agencies are providing substantial financial and in-kind match to the projects, thereby demonstrating their support. Letters of support are shown in Exhibit 4 to this staff recommendation. Finally, under Section 31253, the Conservancy "may provide up to the total of the cost of any coastal resource enhancement project…." and the amount of the Conservancy contribution is determined after an assessment of funding generally available and other factors. The proposed contribution by the Conservancy was determined based on application of priority criteria and after taking into account other available resources and the matching contributions to the project by other funding sources to previous phases of the project.

Public Resources Code Section 31111 authorizes the Conservancy to fund plans and feasibility studies.

CONSISTENCY WITH CONSERVANCY'S 2007 STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 6, Objective B** of the Conservancy's 2007 Strategic Plan, the proposed project will implement no fewer than five projects to preserve and restore coastal watersheds.

Consistent with **Goal 6, Objective C** of the Conservancy's 2007 Strategic Plan, the proposed project will develop no fewer than four plans to ensure sufficient instream flow to support fish habitat.

Consistent with **Goal 6, Objective D** of the Conservancy's 2007 Strategic Plan, the proposed project will implement no fewer than five projects to ensure sufficient instream flow to support fish habitat.

Consistent with **Goal 6, Objective F** of the Conservancy's 2007 Strategic Plan, the proposed project will implement no fewer than five projects to improve water quality to benefit coastal resources.

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 November 10, 2011, 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. **Support of the public:** Project specific support comes from Sanctuary Forest, American Rivers, Coastal Habitat Education and Environmental Restoration, Sotoyome Resource Conservation District, San Mateo Resource Conservation District, Santa Clara Valley Water District, California Department of Fish and Game, NOAA's National Marine Fisheries Service, National Fish and Wildlife Foundation, Natural Resources Conservation Service and the US Fish and Wildlife Service, Congressman Mike Thompson, State Senator Noreen Evans and Assemblyman Wes Chesbro. See Exhibit 4 for project letters.
4. **Location:** The proposed project would be located primarily outside of the coastal zone, at sites in Humboldt, San Mateo and Santa Clara Counties, (see Exhibit 1). However, the project will have significant benefit for coastal salmon populations that depend upon habitat both within and outside the coastal zone, and specifically depend upon adequate instream flow to spawn and rear.
5. **Need:** TU has attracted a significant amount of funding to initiate these projects, but their scale of success would be severely reduced absent financial support from the Conservancy.
6. **Greater-than-local interest:** Water conservation in the West, particularly in an era of climate change and predicted periods of severe drought, is of international interest and importance. The Conservancy is pioneering this work in California, and there is no doubt that its success will prompt many landowners and interests to mimic this progress for the benefit of natural resource protection, water conservation, food security and more.
7. **Sea level rise vulnerability:** None of the project sites are vulnerable to sea level rise at estimated projections.

Additional Criteria

8. **Urgency:** Coastal salmon populations are upon the brink of extinction or extirpation. Instream flow, or rather the lack thereof, is well understood to be a key factor in their decline. Implementing water conservation measures quickly is essential to the future of coastal salmon, and other species. Water conservation is also fundamental to the protection of food security and coastal agriculture in an era of climate change and unpredictable rainfall patterns.
9. **Resolution of more than one issue**: Farms and fish require water. Providing an adequate supply to both in a well organized manner is the crux of these projects.
10. **Leverage**: See the "Project Financing" section above.

11. **Conflict resolution**: Traditionally, water conservation efforts have pitted farmers and other water users against fish restoration interests. The grantee has successfully navigated that impasse, and brought before the Conservancy a series of proposals to resolve longstanding conflicts over water use.
12. **Innovation**: By conducting all of the necessary research and feasibility assessment prior to conducting design work, TU has helped avoid many of the common pitfalls associated with permitting these types of projects. As a result, TU is prepared to implement projects that already enjoy the support of the regulatory and the regulated community.
13. **Readiness**: All of the proposed projects are ready to be constructed, with the exception of San Gregorio, Pescadero and the Little Arthur Creek pond, all of which are proposed herein for final design, engineering and permitting work.
14. **Realization of prior Conservancy goals**: See "Project History" above.
15. **Return to Conservancy**: See the "Project Financing" section above.
16. **Cooperation**: By design, TU works with a wide variety of project partners, including landowners, public agencies, non-profit organizations, and industry associations. Much of their support and cooperation comes from a shared vision to identify places and projects that demonstrate that we can restore flow at a watershed scale and produce benefits for both coastal communities and aquatic resources. Landowners in particular are contributing by providing acreage for project construction at no cost, and accepting voluntary changes to existing water rights, property rights that are highly valuable.
17. **Vulnerability from climate change impacts other than sea level rise:** Rather than being vulnerable to climate change impacts other than sea level rise, the projects provide an important social and ecological buffer against predicted climate change impacts such as global warming and severe drought conditions.
18. **Minimization of greenhouse gas emissions:** Construction methods will be tailored to avoid or minimize greenhouse gas emissions to the extent feasible and consistent with the project objectives.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

The projects are consistent with all applicable local coastal plans in each of the selected project areas because they will focus on coastal anadromous salmonid habitat specifically identified in the pertinent certified local coastal plans as being in need of enhancement and restoration, pursuant to Public Resources Code Section 31252. Selected streams will be located both within and outside of the coastal zone. However, because the aquatic resources and habitat quality of stream channels are inextricably linked, the study will ultimately benefit resources within the coastal zone. Barriers to fish passage can be caused by insufficient flow levels and elevated stream temperatures caused by excessive diversion. Such barriers affect coastal resources regardless of barrier location within the watershed. The anadromous fish populations that spend part of their life within the coastal zone reside for extended periods outside of the coastal zone, and therefore depend upon free passage and hospitable residence within a watershed throughout their life history.

Mattole River

The Mattole River is identified as a perennial stream in the Humboldt County General Plan Volume II South Coast Area Plan of the Humboldt County Local Coastal Program. Under the Water Withdrawals section it states that "[m]inimum stream flow shall be maintained as necessary to support habitat for coastal cutthroat trout, steel head, and/or silver salmon." (Section 3.41F). Absent an enforceable water conservation system such as that proposed in this recommendation, achieving this policy objective remains impossible. Hence, the proposed Mattole projects are consistent with the LCP.

San Gregorio Creek

The San Mateo Local Coastal Program dictates that riparian corridors and habitats supporting rare, endangered and unique species are "Sensitive Habitats" wherein "…all uses shall be compatible with the maintenance of biologic productivity of the habitats" (Local Coastal Program for San Mateo County 7.1-7.2). The LCP also sets performance standards in riparian corridors, calling for efforts to "prevent depletion of groundwater supplies and substantial interference with surface and subsurface waterflows" (LCP 7.10). It is well known that San Gregorio Creek is oversubscribed from a water management standpoint, and will only benefit through the application of significant water storage and conservation measures as those called for in this staff recommendation. Thus, the proposal is consistent with the LCP.

Pescadero Creek

As with San Gregorio Creek, the San Mateo Local Coastal Program dictates that riparian corridors and habitats supporting rare, endangered and unique species are "Sensitive Habitats" wherein "…all uses shall be compatible with the maintenance of biologic productivity of the habitats" (Local Coastal Program for San Mateo County 7.1-7.2). The LCP also sets performance standards in riparian corridors, calling for efforts to "prevent depletion of groundwater supplies and substantial interference with surface and subsurface waterflows" (LCP 7.10). Lastly, the management of Pescadero Marsh is one of the few specific areas called out for attention, and the LCP encourages the State to "conduct a thorough hydrological study of the watershed with emphasis on efficient utilization of existing yields through detailed knowledge of diversion, pumping acticvities and flooding potential…." (LCP 7.21 (b). To a lesser degree than San Gregorio, it is well established at Pescadero that diversions of in stream flows are adversely affecting the aquatic and riparian habitat. Thus, proposals to improve instream flow levels to the benefit of aquatic resources and sensitive habitats are entirely consistent with the LCP.

Little Arthur Creek.

Little Arthur Creek is a tributary to the Pajaro River that drains into Monterey Bay along the boundaries of Santa Cruz and Monterey County. However, it is well outside of areas evaluated in either the LCPs for Santa Cruz or Monterey. Nevertheless, the County of Santa Cruz identifies the Pajaro as a water source for areas within Santa Cruz County, and the steelhead populations of the Pajaro are certainly dependent upon land use decisions within and outside of the Santa Cruz LCP jurisdiction. It is the policy of the LCP to maintain minimum stream flows for anadromous fish runs at a high level, notably 95% of normal levels during summer months (Santa Cruz LCP §5.6.1, p. 5-23). Little Arthur Creek is not protected at anything near this level. This level of protection could only be achieved with the addition of water storage and conservation projects as

identified in the staff recommendation. Hence the proposed projects for Little Arthur Creek are entirely consistent with the Santa Cruz LCP.

COMPLIANCE WITH CEQA:

Mattole

The Mattole project consists of the installation of two water tanks on already disturbed land. One tank is on a construction company site, and the other is located on school grounds. The following CEQA exemptions apply to this project. The water tanks are "small facilities or structures" categorically exempt pursuant to 14 Cal. Code Regs. (CCR) § 15303. The installation of the tanks constitutes a "minor alteration to land" also categorically exempt pursuant to CCR § 15304. This project is also categorically exempt as a small habitat restoration project pursuant to CCR § 15333. The school water tank installation is categorically exempt pursuant to CCR §§ 15311 and 15314, as an accessory structure to an existing institutional facility and as a minor addition to an existing school, respectively.

San Gregorio Creek

This project involves the conceptual design and feasibility analysis for alterations to existing ponds. As such, it is statutorily exempt under 14 CCR § 15262.

Pescadero Creek

This project involves the conceptual design and feasibility analysis for alterations to existing ponds. As such, it is statutorily exempt under 14 CCR § 15262.

Little Arthur Creek

The Little Arthur Creek project includes both the design and engineering for one offstream water storage pond, and the installation of three water tanks downstream. The design and engineering of the pond is statutorily exempt from CEQA pursuant to 14 CCR § 15262.

The installation of the water tanks is categorically exempt under CEQA. The water tanks are "small facilities or structures" exempt pursuant to 14 CCR § 15303. The installation of the tanks constitutes a "minor alteration to land" exempt pursuant to 14 CCR § 15304. This project is also exempt as a small habitat restoration project pursuant to 14 CCR § 15333.

Staff will file Notices of Exemption upon approval.