

COASTAL CONSERVANCY

Staff Recommendation
June 25, 2015

GRAPE CREEK OFF-CHANNEL IRRIGATION POND

Project No. 14-054-13
Project Manager: Lisa Ames

RECOMMENDED ACTION: Authorization to disburse up to \$215,000 to the Sonoma Resource Conservation District to construct an off-channel irrigation pond to halt water diversion from Grape Creek and improve critical in-stream habitat for coho salmon.

LOCATION: 4250 Wine Creek Rd, Healdsburg, Sonoma County

PROGRAM CATEGORY: Integrated Coastal and Marine Resource Protection

EXHIBITS

- Exhibit 1: [Project Location Map](#)
 - Exhibit 2: [Site Plan](#)
 - Exhibit 3: [Project Letters](#)
 - Exhibit 4: [Mitigated Negative Declaration](#)
-

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Section 31220 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes up to two hundred fifteen thousand dollars (\$215,000) to the Sonoma Resource Conservation District (Sonoma RCD) to construct an off-channel irrigation pond to halt water diversion from Grape Creek and improve critical in-stream habitat for coho salmon.

The authorization is subject to the following condition:

Prior to the disbursement of funds, the grantee shall submit for the review and approval of the Conservancy’s Executive Officer, a final work program, schedule, budget, names of any contractors, a plan for acknowledging Conservancy funding, evidence that all permits and approvals required to implement the project have been obtained, and an agreement with the landowner sufficient to accomplish the purposes of the project.”

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 5.5 of Division 21 of the Public Resources Code, regarding integrated coastal and marine resource protection.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Conservancy has independently reviewed and considered the information contained in the Final Mitigated Negative Declaration for the Grape Creek Streamflow Enhancement and Off-Channel Irrigation Pond Project adopted by the Sonoma Resource Conservation District May 27, 2015 pursuant to the California Environmental Quality Act, attached to the accompanying staff recommendation as Exhibit 4, and finds no substantial evidence that the project as mitigated will have a significant effect on the environment.”

PROJECT SUMMARY:

The Grape Creek Off-Channel Storage Pond Project (“project”) was one of the Climate Ready Grants projects presented at the Coastal Conservancy’s January 29, 2015 meeting. The project was included for the Conservancy’s consideration in the Climate Ready Grants staff recommendation because of its high ranking, however because the lead agency had not completed CEQA analysis for the project, staff separated the project from funding authorization and informed the board that the project would return at a later date as a consent item once CEQA was complete. (Link to [Coastal Conservancy Staff Recommendation: Climate Ready Grants, January 29, 2015](#))

The project entails the construction by the Sonoma Resource Conservation District (“Sonoma RCD”) of an approximately 2-acre off-channel irrigation pond and associated pumping infrastructure on privately-owned agricultural land to eliminate summer water diversion and benefit salmonid habitat in Grape Creek. The landowner will fill the pond by pumping from existing streamside groundwater wells during the winter period of December through March. The landowner will use the water stored in the pond to irrigate a vineyard during the dry season. Additionally, the landowner will plant 250 drought-tolerant native trees and shrubs around the pond to act as a carbon sink. The landowner will enter into a forbearance agreement prohibiting the use of the streamside wells during the dry season. The purpose of the project is to improve streamflow conditions for sensitive fish species in the critical summer months, while simultaneously increasing water security for an agricultural producer.

Grape Creek is a key tributary to Dry Creek, which flows into the Russian River and has been the focus of fisheries restoration for the greater Russian River Watershed. Grape Creek is one of five Russian River tributaries that have been the subject of efforts to restore summer base flow through the dry season as part of the National Fish and Wildlife Foundation (NFWF)-funded Russian River Coho Partnership (Partnership) (<http://www.cohopartnership.org/>). A broad coalition of public and private groups has been supporting restoration through the Russian River Coho Salmon Captive Broodstock Program since 2001. The Conservancy-funded Grape Creek Streamflow Improvement Plan selected Grape Creek as a pilot watershed because low flow was

determined to be a critical but not intractable limiting factor, because a critical mass of landowners expressed their interest and support in collaborative problem-solving, and because it ranked high in federal and state recovery plan prioritization.

As a result of other water conservation projects upstream and downstream of this property, there are no longer any direct diversions from Grape Creek and no on-stream dams. Grape Creek is already an example of a successful watershed approach, and this project specifically has the potential to influence other agricultural operators to adopt climate adaptation practices to reduce agricultural water demand and the need to pull from the stream or a streamside well during the dry season, thereby helping to protect both the natural systems of the watershed and the surrounding agricultural lands from the projected consequences of climate change.

The Sonoma RCD is a reorganization of the Sotoyome and Southern Sonoma County RCDs, which occurred in July 2013. Both RCDs shared a nearly sixty-year history of conservation achievements in Sonoma County, collaborating with funders and landowners to develop mutually beneficial projects on agricultural lands that increase the resiliency of working landscapes for people and for the fish and wildlife that depend on them. Both RCDs were highly regarded for their technical assistance and local outreach and education programs. The Sonoma RCD continues the work of these RCDs.

Site Description:

The project area is located along Wine Creek Road adjacent to the main stem of Grape Creek, a key tributary to Dry Creek (Exhibit 1). The area is approximately 4000 feet upstream from where Grape Creek flows into Dry Creek and 400 feet upstream from the confluence with Wine Creek. The project will occur within a current vineyard in the northwest corner of the property. Approximately 2 acres will be removed from grape production to accommodate the project (Exhibit 2). On the property, Grape Creek and its associated riparian habitat is composed of willow, maple, buckeye, bay and other species and is bound by agricultural land. Grape Creek has been stocked with thousands of hatchery of fish through the *Russian River Coho Salmon Captive Broodstock Program* since 2001.

Through four years of combined monitoring efforts by the Russian River Coho Partnership, the presence of coho salmon, steelhead trout, and Chinook salmon have been documented in Grape Creek with coho salmon returning in three of the four years monitored. In each year that juvenile coho were observed, the highest concentrations of fish were found in the proposed project reach, evidence that this reach contains the prime spawning habitat in Grape Creek watershed. It has been demonstrated in the watershed that juvenile coho can survive with very little stream flow, and flow data collected in summer 2013 suggests interconnectedness between the well pump, the shallow aquifer, and water levels in this reach of Grape Creek. Even a small percentage increase in available water for flow could have significant improvement for fish habitat in the dry season.

Project History:

Since 2008, work in the Grape Creek watershed has been supported through the Russian River Coho Water Resources Partnership, a group of six organizations (Center for Ecosystem

Management and Restoration (CEMAR), Sonoma Resource Conservation District and Gold Ridge Resource Conservation District (RCDs), Occidental Arts and Ecology Center, Trout Unlimited (TU), and GIS lab at University of California's Hopland Research and Extension Center) collaborating to implement the National Fish and Wildlife Foundation (NFWF) Keystone Initiative for coho salmon in the Russian River. The Grape Creek Streamflow Improvement Plan, funded in part by a Conservancy grant, selected Grape Creek as a pilot watershed because low flow was determined to be a critical but not intractable limiting factor, because a critical mass of landowners expressed their interest and support in collaborative problem-solving with the RCD, and because it ranked high in federal and state recovery plan prioritization. The Plan was completed in March 2013 and identifies and prioritizes instream flow project work and describes conditions of the watershed in detail (accessed at: <https://app.box.com/s/w673u2ti898mw8xln1xt>). This off-channel irrigation pond will help implement the plan's recommendations.

The Sonoma RCD has been at the heart of these efforts as a leader in outreach to landowners and in implementing successful projects. This proposed project is considered the last large scale water conservation project needed in Grape Creek for sustainable fish returns. All known frost protection diversions have been eliminated from the watershed. Sonoma RCD has also implemented a variety of habitat improvement projects, including instream structures, riparian enhancement, erosion control and removal of a partial upstream migration barrier. Multiple projects have been implemented in partnership with the Sonoma County Water Agency as part of the federally mandated Russian River Biological Opinion to help protect salmonids and water supply in the greater Dry Creek Watershed. In addition, many landowners in the watershed have benefitted through increased water security and improved function of the surrounding land. Grape Creek has proved to be a successful example of an integrated approach for salmonid restoration at a watershed scale.

PROJECT FINANCING

Coastal Conservancy	\$215,000
California Department of Fish and Wildlife (CDFW)	\$439,412
Natural Resource Conservation Service (NRCS)	\$65,595
National Fish and Wildlife Foundation (NFWF)	\$38,384
Trout Unlimited (TU)	\$2,970
<u>Sonoma RCD</u>	<u>\$2,150</u>
Project Total	\$763,511

The landowner will contribute significant time and materials to trellis and vine removal and operating and maintenance cost for the pond once constructed. Conservancy funds will allow the Sonoma RCD to secure matching funds through the CDFW Fisheries Restoration Grant Program, (expected February 2016) and the NRCS Environmental Quality Incentives Program (expected September 2016). NFWF, TU and RCD funds have been secured.

Conservancy funds for this project are expected to derive from an appropriation to the Conservancy from Proposition 84, the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006, Public Resources Code § 75001, et seq. as well as an appropriation to the Conservancy from Proposition 50, the Water Security, Clean Drinking Water, Coastal and Beach Protection Act of 2002, Water Code § 79500, et seq.

Proposition 84 funds can be used for projects that are consistent with the Conservancy's enabling legislation (Division 21 of the Public Resources Code) and that protect coastal waters and watersheds, including projects to prevent contamination and degradation of coastal waters and watersheds and projects that restore natural habitat values of coastal waters and lands (Public Resources Code § 75060(b)). Use of Proposition 84 funds for the proposed project is appropriate because the proposed project will prevent continued degradation of, and help restore the natural habitat values of Grape Creek, which drains into the Russian River, which is within a coastal watershed. In addition, the proposed project is consistent with Chapter 5.5 of Division 21, as discussed in greater detail below.

This project is appropriate for prioritization under the criteria in Public Resources Code Section 75071 (a provision of Proposition 84) because the project includes non-state matching funds and will contribute to the long-term protection of and improvement to the water and biological quality of streams in the Russian River watershed, a priority watershed of one of the major biological regions of the state as identified by the Natural Resources Agency.

Proposition 50 funds are appropriated to the Conservancy for projects undertaken pursuant to the Conservancy's enabling legislation (Division 21 of the Public Resources Code) that restore and protect coastal watersheds, including associated planning and permitting. Water Code § 79570(a). The Project is consistent with these purposes because it will dedicate 100% of the water currently used for vineyard irrigation back to a stream in the Grape Creek watershed that is connected to the greater Russian River Watershed to improve streamflow conditions. As required by Proposition 50, the project is consistent with the applicable adopted local watershed management plan and the applicable regional water quality control plan as detailed below in the "Consistency with Local Watershed Management Plan/State Water Quality Control Plan" section.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project will be undertaken pursuant to Chapter 5.5 of the Conservancy's enabling legislation, Division 21 of the Public Resources Code (Section 31220), regarding grants for coastal watershed and coastal and marine habitat water quality, sediment management, and living marine resources protection and restoration projects.

Pursuant to Section 31220(b)(2), the Conservancy is authorized to award a grant for a project that protects or restores fish and wildlife habitat within a coastal watershed; the proposed project will protect fish habitat within Grape Creek.

Pursuant to Section 31220(b)(3), the Conservancy is authorized to award a grant for a project that reduces threats to coastal and marine fish and wildlife. The proposed project will reduce threats to the survival of the coho salmon in the Grape Creek watershed.

Pursuant to Section 31220(b)(7), the Conservancy is authorized to award a grant for a project that reduces the impact of population and economic pressures on coastal and marine resources. The proposed project will reduce the impact of vineyard production on the in-stream habitat of a coastal watershed.

As required by Section 31220 (a), staff has notified the State Water Resources Control Board of this project and provided the opportunity for comment, input and review. As Section 31220(c) requires, the proposed project is consistent with local and state watershed plans. This is discussed in detail below under “Consistency With Local Watershed Management Plan/State Water Quality Control Plan.” Also, pursuant to Section 31220(c) the project has a monitoring and evaluation component.

**CONSISTENCY WITH CONSERVANCY’S 2013
STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):**

Consistent with **Goal 4, Objective 4C**, the project will preserve and restore fish and wildlife corridors between core habitat areas from coastal to inland habitat areas.

Consistent with **Goal 5, Objective 5E**, the project will result in improved fish habitat by improving in-stream habitats, increasing stream flow and providing favorable water temperatures for salmonids.

Consistent with **Goal 6, Objective 6B**, the project will foster the long term viability of coastal working lands by assisting a farmer to reduce the impact of agricultural operations on wildlife habitat and water quality.

**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:**
 - i. The goal of increasing water storage as a drought resiliency strategy for local agriculture is supported by the 2014 *Safeguarding California: Reducing Climate Risk* update to the 2009 *California Climate Adaptation Strategy* (California Natural Resources Agency) under the section ‘Actions Needed to Safeguard Agriculture,’ which promotes management strategies that reduce climate risks to water including enhanced flood management, water use

efficiency, and regional groundwater management for drought resiliency (p.35).

- ii. The project is consistent with the January 2014 *California Water Action Plan* (California Natural Resources Agency) which seeks to “manage and prepare for dry periods (small scale tanks or impoundments to reduce extraction from streams during low flows,” as well as to “expand water storage capacity and improve groundwater management (increase groundwater recharge);”
 - iii. The project meets the goals of the 2013 Draft of *California @ 50 Million: The Environmental Goals and Policy Report* (Governor’s Office of Planning and Research) which seeks to “preserve agricultural lands and working landscapes to support the state’s agriculture and forestry industries in the most sustainable manner;” and
 - iv. The project meets the goals of the *Recovery Strategy for California Coho Salmon* (Department of Fish and Wildlife Report to the California Fish and Game Commission (February 2004)), developed as a guide for the process of recovering coho salmon (*Oncorhynchus kisutch*) on the north and central coasts of California.
4. **Support of the public:** The project has support as indicated by the project letters provided in Exhibit 3.
 5. **Location:** The project is located in the Grape Creek watershed, a key tributary to Dry Creek, which flows into the Russian River and has been the focus of fisheries restoration for the greater Russian River Watershed in Sonoma County.
 6. **Need:** Without Conservancy funding to leverage other funding, the proposed project will stall and may not get implemented. As long as this project is not implemented, it is expected that steelhead trout and coho salmon will not be able to complete their life cycle due to lack of pool connectivity and summer base flow. The lower and upper portions of Grape Creek will continue to be disconnected during the summer months. The opportunity to implement an innovative water conservation demonstration project on private agricultural lands that will address on-farm water demand reduction, enhanced water use efficiency, and reduce the need to pull from a streamside well during low flow periods will be missed. This type of project is a model for an integrated and viable approach to address future drought conditions within the region.
 7. **Greater-than-local interest:** This project is of state-wide interest due to the possibility of improving habitat for the recovery of coho salmon.
 8. **Sea level rise vulnerability:** The project is not close to a shoreline and would not be impacted by sea level rise.

Additional Criteria

9. **Urgency:** Reducing water diversion from the Grape Creek system as soon as possible will improve the chances for the survival of the coho salmon.
10. **Resolution of more than one issue:** The project will contribute to salmonid restoration at a watershed scale and increase water security for the agricultural landowner.
11. **Leverage:** See the “Project Financing” section above.
12. **Conflict resolution:** The proposed project will resolve competing water demands between agricultural and fish habitat uses by implementing water collection measures that provide the opportunity to divert 100% of water used for irrigation of agricultural lands.
13. **Readiness:** The Sonoma RCD is ready to commence the project once Conservancy funding is secured and able to leverage funds from the CDFW’s Fisheries Restoration Grant Program.
14. **Realization of prior Conservancy goals:** “See “Project History” above.”
15. **Cooperation:** The project is intended to foster cooperation across multiple regional and political boundaries to address the impacts of climate change. To achieve this goal, multiple nonprofit organizations and federal, state, and local agencies are involved in project implementation.
16. **Minimization of greenhouse gas emissions:** The project will employ Best Management Practices during construction to reduce emissions including: carpooling to the jobsite, use of low carbon fuels, use of equipment with more energy efficient engines and contracting with vendors in close proximity. Additionally, over 250 drought-tolerant native trees and shrubs will be installed and will act as a carbon sink.

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

Projects undertaken pursuant to Public Resources Code § 31220 must be consistent with the following, if available and relevant: Integrated Watershed Resource Management Programs; local watershed management plans; and water quality control plans adopted by the state and regional water boards. Coastal watershed projects funded with Proposition 50 funds must also be consistent with such plans.

The project is consistent with the *Grape Creek Streamflow Improvement Plan, 2013* (“Plan”), which was prepared by the Russian River Coho Water Resources Partnership. The Plan recommends shifting creek diversions from summer to winter to result in more streamflow during summer, which is exactly the activity proposed by this project (Plan, p.46). The project is also consistent with the North Coast Regional Water Quality Control Board Basin Plan (“Basin Plan”), including the recently adopted amendment to Chapter 4 of the Basin Plan, which supports restoration projects that protect, enhance and recover beneficial uses.

COMPLIANCE WITH CEQA:

The proposed project was reviewed under the California Environmental Quality Act (CEQA) in the Final Mitigated Negative Declaration for the Grape Creek Streamflow Enhancement and Off-

Channel Irrigation Pond (MND) adopted by the Sonoma RCD on May 27, 2015, attached to this staff recommendation as Exhibit 4.

In the MND, Sonoma RCD finds that the proposed project has the potential for short-term adverse impacts on aesthetics, air quality, biological resources, hydrology and water quality, noise, transportation and traffic, and hazards associated with heavy equipment use. Mitigation measures incorporated into the project will insure the reduction of all potentially significant impacts to less than-significant levels as described below:

Aesthetics: The pond will be visible from the public road. To lessen visual impacts, the area surrounding the pond will be revegetated with native plants and construction will be limited to the daytime to avoid nighttime lighting.

Air Quality: The project will result in temporary air pollutant emissions from construction activities. To mitigate these impacts, heavy-duty construction equipment will be stored on-site to minimize exhaust emissions and dust associated with travel to and from the site. To prevent excessive dust, areas of ground disturbance will be watered and graded surfaces will be covered with erosion control fabric and/or vegetated as soon as possible after the completion of grading.

Biological Resources: To protect biological resources, a qualified biologist will conduct a training session for all construction crew personnel discussing the sensitive biological resources within the project site and the potential presence of special-status species. In addition, temporary wildlife exclusionary fencing will be installed around work areas during construction to preclude animals from entering the work area and prevent construction debris and workers from entering adjacent riparian and aquatic habitats.

Special status animal resources

Two special-status bat species (pallid bat, Townsend's big-eared bat), and one nonlisted species of local interest bat (hoary bat), have moderate potential to occur within the property, and additional bat species may utilize the property for foraging and roosting, as well. To protect these species, construction will be limited to daylight hours and trees containing bat roosts will not be trimmed until the roost is determined to be abandoned or unoccupied or CDFW authorizes the trimming.

Several special status bird species, including osprey and white-tailed kites, have a moderate potential to occur on the property, and additional bird species may utilize the site for breeding as well. To protect birds, construction will be limited to outside of the critical breeding period (mid-March through mid-August) for special-status birds to the extent feasible. If activities must occur during the normal breeding season, a qualified biologist will survey and create no-disturbance buffers around any nesting locations. If state and/or federally listed birds are found breeding within the area, activities will be halted, and the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service will be consulted.

One special-status reptile, Pacific pond turtle, and two special-status amphibians, foothill yellow-legged frog and California red-legged frog, may utilize the upland and riparian habitat on the project site. Although there are no occurrences of California redlegged frogs in the Dry Creek

watershed, there is suitable foraging, migration and estivation habitat in the area. To protect these reptiles and amphibians, no work will occur until after completion of a survey, relocation of any adults, and identification of any nests, which will be protected from disruption. On-going monitoring during construction will also occur so that steps can be taken to protect any of these reptiles or amphibians that have moved back into the area prior to completion of construction.

The Grape Creek watershed supports steelhead trout, coho, and Chinook salmon; water quality impacts from construction (sedimentation and chemicals) may adversely impact these special-status fish. To avoid adverse impacts, all staging, maintenance, fueling, and storage of construction equipment will occur in a location and manner that will prevent potential runoff of excess sediment and petroleum products into Grape Creek and adjacent aquatic habitats. Oil-absorbent and spill-containment materials will be on site at all times. In addition, the contractor and landowner will not use pesticides, and will minimize use of fertilizers.

If the pond is stocked with trout and other exotic, non-native fish species, there is a risk these species could enter Grape Creek (for example through the pond overflowing), which could adversely impact native, anadromous fish species. The pond could also be used by bullfrogs which prey on frogs and can compete for habitat and food. To avoid these impacts, the Sonoma RCD will provide the landowner with an Operations Guide outlining measures for operating the pond in a manner that protects biological resources.

Riparian and aquatic plant habitats

The project site contains native Oregon Oak trees, riparian vegetation along Grape Creek and remnant native perennial purple needle grass along the pond site boundary. To protect these habitats: a) the purple needle grass will be protected or the plants salvaged and replanted in the area following construction, b) the riparian vegetation will be protected from disturbance, and c) the root crown and root zone (Root Protection Zone -RPZ) of native Oregon Oak trees will be delineated and work within the RPZ limited. A qualified arborist will guide trenching operations during installation of the pipelines to minimize potential damage to tree roots and will guide tree trimming if needed during construction. Any loss of native trees shall be replaced.

Best management practices will also be employed to prevent new infestations and the continued spread of invasive plant species.

Geology and Soils: Best management practices will be used to reduce the potential for substantial soil loss or the loss of topsoil during grading. Such practices will include diversion of surface water around the toe of the embankment, armoring of the overflow, and installation of an erosion control blanket and straw fiber rolls on the embankment slopes.

Hazards: Heavy construction equipment has the potential to release oil, hydraulic fluid, or other hazardous substances, or to result in grass fires. To minimize hazards, the contractor shall undertake construction of the project in accordance with the County's grading regulations and implement Best Management Practices as identified in the SWPPP, the LSAA 1602 permit, the project plans and specifications.

Hydrology and Water Quality: Groundwater will be protected during excavation through use of pumps to hasten drawdown of groundwater to below the bottom of excavation and intermittent pumping during construction. If necessary, the contractor will dewater the construction site to lower the local groundwater level during construction of the pond embankment. Streamflow will be monitored throughout construction. All dewatering activities shall be in accordance with the SWPPP any applicable permits.

To protect water quality, erosion control measures will be used throughout construction.

Noise: Construction equipment will increase ambient noise levels and ground borne vibration temporarily in the vicinity of the project. To lessen the impacts of noise and vibration: a) limited construction will occur only between August 1 and October 15 to protect breeding birds and other animals, b) construction will be limited to the hours between 8:00 a.m. and 6:00 p.m., and c) construction equipment will be equipped with mufflers and stored on the project site to eliminate daily trips on vicinity roadways.

Transportation/Circulation: To reduce the impacts of construction traffic during the August – October construction window, trucks and equipment will enter the site via Wine Creek Road, most construction material will be derived onsite, equipment operators shall be instructed to drive slowly, and heavy equipment will be stored on-site.

The Sonoma RCD adopted at Mitigation Monitoring and Reporting Program on May 27, 2015 to insure that all mitigation measures are carried out. Based on review and consideration of the MND, Conservancy staff concurs with the Sonoma RCD's assessment that the project, as mitigated, will not have a significant effect on the environment, and recommends that the Conservancy, as a responsible agency under CEQA, also make this finding. Staff will file a notice of determination upon Conservancy approval of the project.