

COASTAL CONSERVANCY

Staff Recommendation  
May 26, 2016

**JENNER HEADLANDS  
PUBLIC ACCESS IMPROVEMENTS**

Project No.08-064-02  
Project Manager: Lisa Ames

**RECOMMENDED ACTION:** Authorization to disburse up to \$500,000 to The Wildlands Conservancy to construct an ADA-accessible 30-space parking area and related improvements at the Jenner Headlands in coastal Sonoma County.

**LOCATION:** Jenner, Sonoma County (Exhibit 1)

**PROGRAM CATEGORY:** Public Access

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**EXHIBITS**

- Exhibit 1: [Project Location Map](#)
  - Exhibit 2: [Project Site Plans](#)
  - Exhibit 3: [Project Photos](#)
  - Exhibit 4: [Project Letters](#)
  - Exhibit 5: [Mitigated Negative Declaration](#)
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**RESOLUTION AND FINDINGS:**

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Chapters 4.5 and 9 of Division 21 (Sections 31160, et seq. and 31400, et seq.) of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes disbursement of an amount not to exceed five hundred thousand dollars (\$500,000) to The Wildlands Conservancy (TWC) to construct a 30-space parking area and related improvements on the Jenner Headlands Preserve in Sonoma County subject to the following conditions:

1. Prior to the disbursement of funds, TWC shall submit for the written approval of the Conservancy’s Executive Officer a work program, including schedule and budget, and the names of any contractors it intends to retain for the project.

2. TWC shall incorporate the guidelines of the Conservancy's 'Standards and Recommendations for Accessway Location and Development' and all applicable federal and state guidelines for disabled access into the engineering designs for the project.
3. In carrying out the project, the TWC shall comply with all applicable conditions and mitigation and monitoring measures for the project that are identified in *The Wildlands Conservancy Parking Lot and Trail Mitigated Negative Declaration and Initial Study* (MND/IS) adopted by the Sonoma County Permit and Resource Management Division on March 17, 2016, attached to the staff recommendation as Exhibit 5, and any conditions, mitigation or other measures required by any permit or approval for 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 4.5 and Chapter 9 of Division 21 of the Public Resources Code, regarding projects that improve public access to and along the coast and in counties within the San Francisco Bay area with coastal draining watersheds.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. TWC is a 501(c)(3) nonprofit organization under the U.S. Internal Revenue Code, and its corporate purposes are consistent with Division 21 of the Public Resources Code.
4. The Conservancy has independently reviewed and considered the MND/IS and finds, based on the Conservancy's independent judgment and analysis of the whole record before it, including the environmental documents and public comments received, that the project avoids, reduces or mitigates any possible significant environmental effect and there is no substantial evidence that the proposed project, as mitigated will have a significant effect on the environment, as defined in 14 California Code of Regulations Section 15382."

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#### **PROJECT SUMMARY:**

Staff recommends the Conservancy disburse up to \$500,000 to The Wildlands Conservancy (TWC) to construct an ADA-accessible 30-space parking area for cars, bicycles and buses at the Jenner Headlands in coastal Sonoma County, as part of a larger public access improvement project that includes ADA-accessible restrooms, a day-use area with picnic tables, a trailhead to existing trails, interpretive signage and kiosks and 0.67 acres of wetland restoration and enhancements. Construction of these facilities will enable TWC to open the Jenner Headlands Preserve to daily public access; currently public access is limited to guided tours.

With over three million visitors to the Sonoma Coast each year, on a typical summer weekend, the State Parks' parking lots and pullouts along Highway 1 are filled to capacity with sightseers and those wanting to experience the coast. This project will alleviate some of this overflow and provide free access to the coastal bluffs of the Jenner Headlands Preserve and also include access to a potential route for the California Coastal Trail (CCT). The project site, which is identified in the Local Coastal Plan as an appropriate site for a public use parking lot, will provide public access to the 5,630 Jenner Headlands Preserve, and access to approximately 2.5 miles of coastal

bluffs with spectacular views of the Sonoma coast and Russian River Estuary. This project will also act as a gateway to Sonoma Land Trust's Little Black Mountain and Pole Mountain Preserves, the highest point along the Sonoma County coast with sweeping 360 degree views.

At the present time, the California Coastal Trail alignment in this area follows Highway 1, which directs hikers to travel adjacent to the highway. The parking lot and associated infrastructure could provide access to a future segment of the CCT that would allow travel through the Jenner Headlands Preserve. This alignment would improve hikers' current experience of the coast and provide a safer CCT alignment, furthering the goals of the Conservancy to develop the CCT as a major recreational amenity.

To meet these goals, TWC will construct a 30-space parking area that will include bicycle parking, two spaces reserved for ADA accessible vehicles and two spaces for school buses. All parking lot surfaces will drain into a central bioswale that will capture and remediate rainfall runoff and distribute it through an infiltration basin to a coastal drainage. An ADA-compliant trail will run approximately 400 feet from the parking lot to a restroom facility and day use area. From the day use area, the general public can then gain access to existing trails and unpaved roads to explore the Jenner Headlands Preserve. The larger project includes restoration of 0.35 acres of wetland, enhancement of 0.32 acres of wetland, and restoration of an eroding coastal drainage. Once finished, the parking lot will be open 7-days a week.

TWC owns the Jenner Headlands Preserve, which was acquired in part with Conservancy funds, and manages it according to an Integrated Resource Management Plan (IRMP) developed in collaboration with the Sonoma Land Trust. TWC is a non-profit, public benefit organization that owns 12 preserves encompassing over 145,000 acres located throughout the state of California. TWC has a well-established history of stewarding open space preserves using best known ecological management practices and providing free public recreation on its properties to encourage public participation in saving magnificent landscapes and restoring California's biodiversity.

**Site Description:** The project site is located in the coastal headlands east of Highway 1, approximately 2 miles north of Jenner. (Exhibits 1 & 2) The headlands contain gentle west and southwest facing slopes closer to Highway 1, with steeper slopes (approximately 40%) on the upper reaches of the property. The primary current land use of the property is open space preservation with limited cattle grazing. The site has an existing paved entrance off Highway 1 that will serve as the parking lot entrance. (See Exhibit 3: Project Photos)

TWC selected this area of the Preserve for public access ingress and improvements based on an evaluation of resource protection, safety, permitting and costs. The site was also selected due to public safety related to driveway access and sight distance along this stretch of Highway 1.

The ADA trail from the parking lot will travel along a ranch road that at one time, served as a railroad bed for transporting timber from Jenner Gulch to Rule's Landing located at the mouth of Russian Gulch. The restroom will be located in a small rock quarry that was originally used to create the railroad. The restroom will be incorporated into the hillside of the quarry with a living roof of grass and forbs. Just beyond the restroom area will be a day use area with picnic tables and informational kiosks. Development of the parking lot will also include restoration of 0.35 acres of hillside wetland and enhancement of 0.32 acres of hillside wetlands as well as restoration of several eroding headcuts along a coastal drainage.

**Project History:** The Jenner Headlands Preserve was acquired by funds from the Conservancy, the Sonoma County Agricultural Preservation and Open Space District, California Wildlife Conservation Board, National Oceanic and Atmospheric Administration, United States Department of Agriculture Forest Service, and the Gordon and Betty Moore Foundation. The Conservancy granted \$8,000,000 toward the purchase price of the Preserve. Once acquired, an Integrated Resource Management Plan (IRMP) was prepared to serve as the guiding document for the protection, restoration, and enhancement of significant natural ecosystems and cultural resources of the Headlands and the management of the Preserve. The Conservancy reviewed and approved the IRMP. The IRMP provided an outline of public recreation on the Preserve, which identified the project site as the most appropriate location for vehicular access for public recreation. The Conservancy also assisted in the acquisition of the adjacent Pole Mountain Preserve which will be accessed by this trail. In addition to its adjacency to Jenner Headlands Preserve, the Pole Mountain Preserve was acquired to provide access to one of the highest points in the Sonoma Coastal Range.

### PROJECT FINANCING

In addition to securing the SLT and private funding for the acquisition, TWC is contributing the staff time, as well the long-term management of the public access improvements on the Jenner Preserve.

<b>Coastal Conservancy</b>	\$500,000
The Wildlands Conservancy (TWC)	\$250,000
Sonoma Land Trust	\$100,000
Private Funding	\$450,000
<b>Project Total</b>	<b>\$1,300,000</b>

One expected source for the Conservancy funds for this authorization is from the FY 2013-14 appropriation to the Conservancy from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006, "Proposition 84," Public Resources Code section 75001 *et seq.*, specifically for projects within the San Francisco Bay Area that drain to the coast. This funding source may be used to carry out projects, like this one, pursuant to Chapter 4.5 of the Conservancy's enabling legislation, Division 21 of the Public Resources Code section 75060(c). Consistent with this chapter, the proposed project will promote access to, and enjoyment of the coastal resources of the state within the San Francisco Bay Conservancy Program area.

The other source of funding is expected from the FY 2010-11 appropriation to the Conservancy from Proposition 84. Subsection 75060(b) authorizes the use of these funds for projects that promote access to and enjoyment of the coastal resources of the state and that are consistent with the Conservancy's enabling legislation. The proposed project serves to promote access to coastal resources by constructing a parking lot as part of a larger public access improvement project in Sonoma County, and is consistent with Chapter 9 of Division 21, as explained below. Therefore, this project is appropriate for Proposition 84 funds.

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

The proposed project is consistent with the provisions of Chapter 4.5 of Division 21 of the Public Resources Code, Sections 31160-31165, which authorizes the Conservancy to award grants in the nine-county San Francisco Bay Area to help achieve stated goals. Specifically, the proposed project, located in coastal Sonoma County, supports the program goals as stated in more detail below.

Section 31162(a) authorizes the Conservancy to develop and improve public trail systems in a manner that is consistent with the rights of private property owners and will not have a significant adverse impact on agriculture, environmentally sensitive areas and wildlife. The proposed project will add needed trail-related facilities to the Sonoma County trail system and will be sited and designed to avoid adverse impacts to agriculture, environmentally sensitive areas and wildlife (see the "Project Description" section, above, for additional information)

Section 31162(d) authorizes the Conservancy 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 proposed project entails the construction of public access improvements on the Jenner Headlands Preserve, which will help make the Preserve accessible to the urban population of the Bay Area for recreation and nature study.

Additionally, the Jenner Headlands Public Access Improvements will be undertaken pursuant to Chapter 9 (Section 31400 et seq.) of the Conservancy's enabling legislation, Division 21 of the Public Resources Code. This chapter authorizes the implementation of a system of public access ways to and along the state's coastline.

Section 31400 states that the right of the public to access and enjoy coastal resources should be effectively guaranteed, and that the Conservancy should have a principal role in the implementation of a system of public accessways to and along the coastline.

Pursuant to section 31400.1, the Conservancy may award grants to a local public non-profit organization to develop and manage lands for public access to and along the coast. The proposed project will enable safe public access to the Jenner Headlands Preserve, and access to approximately 2.5 miles of coastal bluffs. Section 31400.2 requires the Conservancy to consider a number of factors in determining the amount of funding for an access project. Consistent with this section, the proposed level of funding was evaluated relative to the total amount of funding available to the Conservancy for coastal access projects, the fiscal resources of TWC, and the Conservancy's project selection criteria (see "Consistency with Conservancy's Project Selection Criteria & Guidelines"). TWC has committed to provide funds to this project, along with the Sonoma Land Trust and private donors; however, TWC cannot complete the planned access improvement project without Conservancy assistance. Further, funding these improvements will realize one of the Conservancy's goals in acquiring the Jenner Headlands property.

Pursuant to Section 31400.3, the Conservancy may provide such assistance as is required to aid public agencies and nonprofit organizations in establishing a system of public accessways, and related functions necessary to meet coastal access objectives.

Pursuant to Section 31401, the Conservancy has developed "Standards and Recommendations for Accessway Location and Development". In order to ensure that the proposed access improvements are consistent with these standards, as a condition of the grant, TWC will be required to incorporate Conservancy guidelines into the implementation project.

The proposed project is consistent with the Sonoma Local Coastal Program as described in the Consistency with Local Coastal Program Policies below.

**CONSISTENCY WITH CONSERVANCY’S ACCESS PROGRAM STANDARDS:**

**Standard No. 1, Protect Public and Coastal Resources:** The parking area and associated public amenities will be located where they can safely accommodate public use off of Highway 1. This parking area will help prevent crowding and parking congestion and thereby prevent the misuse of coastal resources on the Sonoma Coast. The project is designed and located to: a) minimize alteration of natural landforms and be subordinate to the setting’s character; b) prevent unwarranted hazards to the land and public safety; and d) protect environmentally sensitive habitats and agricultural areas.

**Standard No. 2, Correct Hazards:** The construction and management of the parking lot and trails will not increase the potential of any hazard, such as fire or erosion. An infiltration basin and bioswale will absorb and filter run-off from the parking area and the project includes restoration of eroding head cuts in a drainage ditch south of the parking lot.

**Standard No. 5, Environmentally Sensitive Areas:** The .18 acres of existing wetlands impacted by construction of the parking lot and path will be offset by the creation of .35 acres of new wetlands. Additionally, the project will include enhancement of .32 acres of degraded wetlands areas with water delivery and native wetland species plantings. TWC will obtain all the appropriate consultations and permits for the project from Sonoma County, Caltrans, California Department of Fish and Wildlife, California Regional Water Quality Control Board, US Fish and Wildlife Service and/or the US Army Corps of Engineers.

**Standard No. 9, Scenic Overlooks:** The project includes a 400-foot long ADA-compliant scenic overlook trail leading to a scenic overlook of Highway 1 and the Pacific Ocean. The overlook trail will provide access to existing trails on the Preserve and future access to adjacent properties including Pole Mountain, a scenic peak with 360 degree views of coastal Sonoma County.

**Standard No. 12, Support Facilities:** The project includes construction of a 30-space parking lot that is part of a larger project that will include ADA-accessible restrooms, a day-use area with picnic tables, a trailhead to existing trails, and interpretive signage and kiosks.

**Standard No. 13, Barrier-Free Access:** The parking lot will have 2 spaces reserved for ADA-compliant vehicles. The scenic trail and restrooms will be ADA accessible.

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

Consistent with Goal 2, Objective A of the Conservancy’s 2013-2018 Strategic Plan, the proposed project will expand opportunities for barrier free access to and along the coast and coastal trails.

Consistent with Goal 2, Objective B, the proposed project will open a coastal area that is currently closed to public use, other than by guided tours.

Consistent with Goal 2, Objective D, the proposed project includes funding the construction of new facilities to enhance coastal recreational opportunities,

**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:** By constructing public access improvements on the Jenner Headlands Preserve, the proposed project serves to promote and implement the following state plans and policies:

*Coastal Act (1976)*, Public Resources Code Sections 30210 and 30214 on public access and recreation that call for "maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse."

*Completing the California Coastal Trail Report* (Coastal Conservancy 2003), "Objectives in Completing the California Coastal Trail": Objective #1, which calls for the provision of "a continuous trail as close to the ocean as possible"; Objective # 4 which assures that "the location and design of the trail is consistent with the policies of the Coastal Act and local coastal programs"; Objective #5, which calls for the Coastal trail to be designed to provide "a valuable experience for the user by protecting the natural environment and cultural resources while providing public access to scenic vistas, wildlife viewing, recreational and interpretive facilities"; and Objective #6, which calls to "create linkages to other trail systems".

4. **Support of the public:** The project has received widespread support from numerous organizations, agencies, and community groups, as well as state, federal and local elected officials. Project letters are included in Exhibit 4.
5. **Location:** The proposed project would be located within the coastal zone of Sonoma County.
6. **Need:** Without Conservancy funding, construction of the project would be delayed for one to several years in order to carry out additional fundraising to cover the cost of construction. If the project is not implemented in the near future, the general public will not be able to recreate on the 5,630-acre Preserve, which is one of the central reasons for acquisition of the property. Planning for a segment of the California Coastal Trail on the Preserve would also be delayed due to no suitable access to the public. In TWC's ongoing community outreach

efforts, there is a great deal of interest from the general public and the surrounding communities to have public recreation on the Preserve.

7. **Greater-than-local interest:** The Sonoma Coast, and its associated parks and protected lands, is a national destination visited by over 3 million people each year. The project will provide access to 2.5 miles of coastal bluffs with sweeping views of the Sonoma Coast and the Russian River estuary. The project will also be the access point to Sonoma Land Trust's Pole Mountain and Little Black Mountain Preserve, which can be reached by hiking through interior redwood forests and oak woodlands that dot the ridgelines. All together, the project will provide access to over 6,300 acres of coastal lands.
8. **Sea level rise vulnerability:** The project site is located approximately 210 feet above sea level and is not vulnerable to flooding or erosion.

### **Additional Criteria**

9. **Leverage:** See the "Project Financing" section above.
10. **Conflict resolution:** Public access improvements and the subsequent opening of access on the Jenner Headlands Preserve will help to alleviate overcrowded coastal access areas of the Sonoma County parks and provide a safe alternative coastal trail route other than along Highway 1.
11. **Innovation:** The restroom will have a living roof that will absorb rainfall and support the growth of native grasses and forbs.
12. **Readiness:** TWC has completed the design and environmental review for the project and is in the process of obtaining all necessary permits to enable project construction in summer 2016.
13. **Realization of prior Conservancy goals:** See "Project History" above.
14. **Vulnerability from climate change impacts other than sea level rise:** The project has been designed to prevent flooding by rainfall runoff by redirecting sheet flow above the parking lot hillside to existing drainages to the north and south of the parking lot. Parking lot surfaces and slopes have been designed to direct 100-year rainfall runoff to a central bioswale that will retain water for up to a 72-hour period while allowing water to drain to an infiltration basin, which will then enter a restored drainage located on the south side of the parking lot.
15. **Minimization of greenhouse gas emissions:** The entire parking lot surface and the ADA portion of the trail will be paved with ParkTread, which is an all-natural, light colored (temperature reduction) material that is locally sourced and manufactured in Sonoma County. It is free of heavy metals, toxins and other pollutants and its manufacturing has a low carbon footprint. Spoils created from excavation of the parking lot and associated infrastructure will be spread on-site, eliminating the need to off-haul, which will greatly reduce vehicle miles travelled by heavy machinery. The parking lot and associated infrastructure does not include electricity or the use of running water. Bicycle parking will be included in the project. Two parking spaces will be designated for low greenhouse gas emitting e-vehicles.

The following measures of the project design will sequester carbon. The entire site will be planted with native herbaceous and woody vegetation to screen the facility, enhance native plant cover, and restore wetlands. Native shrubs and small trees will be planted to screen the parking lot facility from travelers driving along Highway 1. The design will include 0.35 of wetland restoration, 0.32 acres of wetland enhancement, as well as restoration of a coastal drainage. These elements will include planting native wetland plants and shrubs that will sequester carbon during their growth. Included in the design is a bioswale that will filter surface water runoff and support woody and herbaceous wetland vegetation. The restroom will have a living roof that will absorb rainfall and support the growth of native grasses and forbs.

**CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:**

The Jenner Headlands Public Access Improvements Project is located within the Coastal Zone and subject to the jurisdiction of the County of Sonoma’s Local Coastal Program (Certified June 1982, Amended December 2001). The proposed project is consistent with the relevant sections of the Local Coastal Program (LCP) and the County of Sonoma’s General Plan.

Consistent with Section V (Recreation) of Sonoma County’s LCP and Section 30210 of the Coastal Act, “maximum access and recreational opportunities shall be provided for all the people, consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.” Consistent with Section 30212.5 of the Coastal Act, “where appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.”

The proposed project meets the LCP’s “Development Criteria for Access Facilities” (V-4) in that the parking area will be sited off Highway 1 for visual and safety reasons and located within one half mile of the trail head. Trails, restrooms and trash receptacles are part of the larger project and also meet the LCP’s development criteria.

In addition, the proposed project is consistent with Sonoma County’s recently adopted *General Plan 2020*, which the County intends to incorporate into its LCP following Coastal Commission review. Policy OSRC-17c of the Open Space and Resource Conservation Element of the General Plan encourages development of the Sonoma Coast Trail (the corridor within which the proposed project is located) and Policy OSRC -17e calls for encouraging private organizations like TWC to assist in the construction and maintenance of trails.

**COMPLIANCE WITH CEQA:**

The proposed project was reviewed under the California Environmental Quality Act (CEQA) in the *Final Mitigated Negative Declaration for the Jenner Headlands Preserve Public Parking Lot and Overlook Trail* (MND) adopted by the Sonoma County Permit and Resource Management Department (PMRD) on March 17, 2016, attached to this staff recommendation as Exhibit 5.

In the MND, Sonoma County PMRD finds that the proposed project has the potential for short-term adverse impacts on biological resources, cultural resources, geology/soils, hazards associated with heavy equipment use, hydrology and water quality and transportation and traffic. Mitigation measures incorporated into the project will insure the reduction of all potentially significant impacts to less than-significant levels.

## **Biological Resources**

### Less than Significant Impact with Mitigation

While the project site contains predominantly grasslands with non-native species, sensitive habitat in the form of seasonal wetlands along seeps and drainages was documented. The delineated wetlands would be impacted by the project by the construction of a small portion of the parking lot, and the driveway, trail and drainage systems. Additionally, the project site was found to support several special status species, including Harlequin Lotus, American Badgers, and possibly California red-legged frogs, and contains breeding/wintering/foraging habitat for several special status birds, including grasshopper sparrows, northern harrier, white tailed kite and burrowing owls.

Mitigation measures include performing spring botanical surveys; use of Best Management Practices during construction; maintenance of a minimum of a 25-foot setback from wetlands as feasible, except as noted on the site development plans; use of protective fencing during construction; and a training session on biological impacts for the construction crews. Where wetlands are impacted, the project proposes recreation of wetlands at a 2:1 ratio through creation of new wetlands southeast of the parking lot and drainage area and enhancement of 0.32 acres of existing wetlands. The proposed parking lot will be sited 35-50 feet from the edge of the drainage to comply with the County's 25-foot setback requirement for undesignated streams.

## **Cultural Resources**

### Less than Significant Impact with Mitigation

TWC conducted a Cultural Resources Study of the project including archival research and a field inspection of the project area. In addition, both the Middletown Rancheria Tribal Historic Preservation Department and the Cloverdale Rancheria of Pomo Indians were contacted about archeological, historic or traditional cultural properties in or near the proposed project site.

Informed by the discovery of the remains of a historic-era (1867) dairy within the study area, the project has been designed to completely avoid the identified remains.

The Middletown Rancheria indicated there are no anticipated Lake Miwok cultural resources in or near the site. The Middletown Rancheria and the Cloverdale Rancheria both indicated that if TWC discovers archeological remains or resources during construction, it should immediately stop construction and notify the appropriate federal agency and local tribes in the area.

Mitigation measures comprise stopping all work in the immediate vicinity should concentrations of prehistoric or historic-era cultural materials be discovered until a qualified archeologist can evaluate the finds and make recommendations. Should human remains be discovered, work will

halt and the County coroner will be notified immediately to conduct the proper investigation and notifications.

## **Geology and Soils**

### Less than Significant with Mitigation

The project includes cuts and fills that, if unregulated, have the potential to increase soil erosion both during and post construction that could adversely impact on-site wetlands and downstream water quality.

As part of the permitting process, TWC is required to meet grading standards and best management practices specifically designed to maintain potential project water quality impacts at a less than significant level during post construction. In addition, the project will implement erosion control and revegetation measures during construction as detailed in an Erosion and Sediment Control Plan, reviewed and approved by the County as part of the permit process.

Mitigation measures include minimizing ground disturbance and retaining existing vegetation to the extent possible to reduce soil erosion during construction. All drainage and wetland areas not identified for development will be protected from silt and sediment in storm runoff through the use of silt fences, diversion berms, and check dams. Fill slopes will be compacted for stabilization. All exposed surface areas shall be mulched and reseeded, and all cut and fill slopes shall be protected with hay mulch and/or erosion control blankets as appropriate. All erosion control measures shall be installed and maintained throughout the rainy season in accordance with the Erosion and Sediment Control Plan.

## **Hazards and Hazardous Materials**

### Less than Significant with Mitigation

Construction will require use of fuels and other hazardous materials that could result in spills if improperly stored or handled.

Mitigation measures include the storage of any flammable liquids be in compliance with Sonoma County codes and Caltrans specifications protecting surface waters, and in the event of a spill of hazardous materials, the Contractor will immediately report the spill and take appropriate actions to contain the spill and prevent further migration. During construction, hazardous materials will be stored on non-porous surfaces away from drainage or environmentally sensitive areas. At no time shall concrete waster be allowed to enter waterways, including creeks and storm drains.

## **Hydrology and Water Quality**

### Less than Significant with Mitigation

Most of the project area drains directly to the Pacific Ocean via a system of small natural drainages and manmade drainage swales. The site also contains a number of springs, seeps and wetland areas as described in the Biological Resources section of the MND. Because the project will have over an acre of ground disturbance, the project will be subject to the requirements of the State Water Resources Control Board General Permit for Construction Projects.

As described in the Geology and Soils section and the Hazardous Materials section of the MND, the project could affect water quality via erosion/sedimentation and release of hazardous materials. However, project design considerations combined with mitigation measures identified in those sections will reduce this impact to less than significant level.

### **Transportation/ Traffic**

California Department of Transportation (Caltrans) District 4 concurred with the project traffic study findings and determined that no shoulder widening will be needed along Highway 1 as part of the project. TWC will apply and obtain all required clearances and permits including an encroachment permit from Caltrans District 4, for all work to be conducted within Highway 1 and associated right-of-way.

Mitigation measures that make the impacts to transportation plans and policies less than significant include compliance with Caltrans comments regarding access design by the project driveway and provisions of an updated site plan showing exiting details, sight distances and Highway 1 profiles.

### **Staff Conclusion**

Based on the foregoing, Conservancy staff recommends the Conservancy find that the project, as mitigated, avoids, reduces, or mitigates the possible effects of the Project to a level of insignificance and finds that there is no substantial evidence that the project, as mitigated, will have a significant effect on the environment.

If the proposed authorization is approved, Conservancy staff will file a Notice of Determination.