

COASTAL CONSERVANCY

Staff Recommendation
May 26, 2016

LANDSMART ON-THE-GROUND FOR SONOMA CREEK VINEYARDS

Project No. 16-001-01
Project Manager: Julia Elkin

RECOMMENDED ACTION: Authorization to disburse up to \$250,000 to the Sonoma Resource Conservation District to design and implement conservation practices to increase water sustainability at four vineyards in the Sonoma Creek watershed in Sonoma County.

LOCATION: Sonoma Creek Watershed, Sonoma County (Exhibit 1)

PROGRAM CATEGORY: San Francisco Bay Area Conservancy

EXHIBITS

Exhibit 1: [Project Location Maps](#)

Exhibit 2: [Final Initial Study/Mitigated Negative Declaration and Draft Mitigation Monitoring and Reporting Plan](#)

Exhibit 3: [Site-Specific Maps](#)

Exhibit 4: [Photographs](#)

Exhibit 5: [Project Letters](#)

RESOLUTION AND FINDINGS:

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

“The State Coastal Conservancy hereby authorizes disbursement of an amount not to exceed two hundred fifty thousand dollars (\$250,000) to the Sonoma Resource Conservation District (“Sonoma RCD”) to design and implement conservation practices to increase water sustainability at four vineyards in the Sonoma Creek watershed in Sonoma County. This authorization is subject to the following conditions:

1. No Conservancy funds shall be disbursed for the project until the Conservancy’s Executive Officer has reviewed and approved in writing:
 - a. A final work plan, including a budget and schedule.
 - b. The name and qualifications of any contractors that Sonoma RCD intends to retain to carry out the project.
-

- c. A plan for acknowledging Conservancy funding.
2. For each project site, Sonoma RCD shall provide evidence that all permits and approvals have been obtained.
3. For each project site, Sonoma RCD shall submit for the Conservancy's Executive Officer's review and approval a written agreement between the Sonoma RCD and the owner of the property on which project work will occur, permitting the work to be undertaken, allowing for access to the property for the purposes of undertaking the work, and agreeing to subsequent monitoring and maintenance.
4. In carrying out the project, Sonoma RCD shall comply with all applicable conditions and mitigation measures for the project that are identified in *Final Initial Study/Mitigated Negative Declaration for the Sonoma County LandSmart Program Coordinated California Environmental Quality Act ("CEQA") Compliance*, as adopted by Sonoma RCD on April 28, 2016, attached to the accompanying staff recommendation as Exhibit 2, 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 of Division 21 of the Public Resources Code, regarding the San Francisco Bay Area Conservancy Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Conservancy has independently reviewed the *Final Initial Study/Mitigated Negative Declaration for the Sonoma County LandSmart Program Coordinated California Environmental Quality Act ("CEQA") Compliance*, as adopted on April 28, 2016 by the Sonoma RCD pursuant to CEQA, which is attached to the accompanying staff recommendation as Exhibit 2 and which adequately describes the proposed project, and finds that 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."

PROJECT SUMMARY:

This authorization would provide up to \$250,000 to the Sonoma Resource Conservation District (Sonoma RCD) to design and implement conservation practices at four privately-owned vineyards in the Sonoma Creek watershed in Sonoma County as a part of the Sonoma RCD's LandSmart Program. The goal of the project is to increase the water sustainability of the four vineyards by implementing structural and vegetative practices that achieve multiple benefits: improved water quality, groundwater recharge, water conservation, habitat enhancement, carbon sequestration, and drought and climate change resiliency.

The LandSmart On-the-Ground for Sonoma Creek Vineyards project stems from the broader LandSmart Program, which was developed by four neighboring RCDs in order to consistently and efficiently deliver conservation services on a regional level, thereby promoting outcomes of

productive lands and thriving streams in Sonoma, Napa, and Mendocino counties. Through its LandSmart Program, the Sonoma RCD works with agricultural landowners to develop farm conservation plans that identify conservation management practices that can be implemented by the landowner, comply with local state and federal regulations and help keep the land productive in the long term.

In the face of drought and climate change, water sustainability (both quality and quantity) has become an even greater challenge for agricultural producers. Times of drought punctuated by floods can exacerbate erosion issues, and water supplies for irrigation have become less certain. While many large vineyard and wine companies have the resources and in-house expertise that equip them to institute comprehensive conservation and water sustainability endeavors on their properties, smaller family vineyards often need assistance to fully realize these goals.

Sonoma RCD has worked with four privately-owned vineyards in the Sonoma Creek watershed to identify conservation practices for each vineyard that will reduce erosion and sedimentation, slow, spread and sink stormwater, enhance habitat, conserve water, sequester carbon, and improve drought and climate change resilience. These practices were identified through LandSmart Plans and irrigation system evaluations, both of which are comprehensive processes designed to identify and prioritize conservation needs within an agricultural property. LandSmart On-the-Ground, as proposed here, builds upon these planning efforts to implement multi-benefit projects to attain productive lands and thriving streams across the landscape. All of the practices included in the proposed project are voluntary improvements that are not part of any water regulatory efforts or compliance requirements.

For the proposed project, Sonoma RCD will implement a total of 73 on-the-ground structural and vegetative practices at the four identified vineyards (Exhibit 3). The conservation practices are drawn from 17 established Conservation Practice Standards developed by the Natural Resources Conservation Service and include: road upgrade and decommissioning; stream habitat improvement; installation of stream crossings; in-channel stabilization; installation of pipeline and appurtenances; water diversion; and vegetation management. Implementation of the proposed on-the-ground practices will result in almost three miles of storm-proofed road, over 2.5 miles of road disconnected from stream crossings, nine stream crossing upgraded for a 100-year storm event, 575 feet of stream treated for erosion and re-seeded/re-vegetated, improved irrigation efficiency for almost 5,000 vines, and over 45 million gallons of water saved over ten years. All four of the landowners have participated in the development of the proposed project, and are committed to providing cost share for implementation and maintaining the work following implementation.

In addition, Sonoma RCD will provide technology and services to two vineyards that will allow them to refine their precision irrigation practices and conserve water. Sonoma RCD will assist the landowners with project development, construction oversight, permitting, and environmental compliance for implementation of the irrigation practices.

Each of the project sites will be monitored for effectiveness and project success through construction inspections, photo and visual monitoring, and annual post-construction inspections. Long-term maintenance of the implemented practices will be the responsibility of the landowner. As practices are implemented, adaptive management will be used to review the effectiveness of these practices and use this information to inform both changes needed to the implemented practices, and selection of practices for future phases of the project on other properties.

LandSmart On-the-Ground for Sonoma Creek Vineyards is envisioned to be a multi-phased project that will continue to identify the highest priority conservation actions on additional vineyards, and implement these actions through future funding phases.

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. In close partnership with landowners, these RCDs completed numerous restoration and sediment control projects in the watersheds of the Russian River, Sonoma Creek and Gualala River and 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 four vineyard sites included in the project are generally hilly, such that stormwater management and erosion from vineyard operations and unpaved roads prove challenging. The vineyard sites get all or some of their water from wells. Conservation of water from these wells and management of stormwater to recharge groundwater is particularly important given that the groundwater basin underlying the watershed is known to be in overdraft, and that drought and climate change threaten to exacerbate groundwater shortages. Photographs of the vineyard sites are included as Exhibit 4.

All of the vineyard sites are located in the Sonoma Creek watershed which is located approximately 45 miles north of San Francisco. The headwaters of Sonoma Creek begin at Hood Mountain, in Sugarloaf Ridge State Park, and run over 30 miles to empty into San Pablo Bay, the north part of the San Francisco Bay. Elevations in the watershed range from sea level to 2,739 feet above mean sea level, at the peak of Bald Mountain. Sonoma's Mediterranean climate is characterized by warm summers and mild, wet winters with an average yearly rainfall of approximately 35 inches. The dominant geology is volcanic, with north-south trending ridges following tectonic fabric defined by NE-SW fault zones. The Sonoma Mountains are to the west and the Mayacamas Mountains are to the east.

Sonoma Creek and its tributaries support a steelhead run (listed as critical habitat by National Marine Fisheries Service), a modest Chinook salmon run, and a population of endangered freshwater shrimp. Biodiversity in general is high compared to other watersheds around the Bay, where urban populations and development are denser. However, the watershed is currently on California's 303(d) list for sediment, nutrients, and pathogens, and these impairments adversely affect fish and wildlife habitat, along with recreational uses in the watershed.

Project History: LandSmart is the name for a regional program carried out by Mendocino, Sonoma and Marin County RCDs that assists landowners in improving water quality and wildlife habitat on their property by implementing nutrient management, erosion control, stormwater management, water conservation, fisheries, wetland and riparian habitat enhancement projects. Through this program, the Sonoma RCD provides a variety of technical services to landowners including road erosion assessment, stream assessment, wetland delineation, riparian revegetation planning, botanical surveys, wildlife surveys, and CEQA and permitting compliance.

In March 2015, the Conservancy approved a grant to the Sonoma RCD to develop a programmatic environmental document to facilitate conservation implementation through the LandSmart program. CEQA compliance for this project is being accomplished through that programmatic document.

PROJECT FINANCING

Coastal Conservancy	\$250,000
Landowners	<u>\$ 83,375</u>
Project Total	\$333,375

The expected source of Conservancy funds for this project is the fiscal year 2015/16 appropriation to the Conservancy from the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Proposition 1, Water Code § 79700 et seq.). Funds appropriated to the Conservancy derive from Chapter 6 (commencing with § 79730) and may be used “for multi-benefit water quality, water supply, and watershed protection and restoration projects for the watersheds of the state” (Water Code § 79731.) The purposes of Chapter 6 include: 1) protect and increase the economic benefits arising from healthy watersheds...; 2) implement watershed adaptation projects in order to reduce the impacts of climate change on communities and ecosystems; 10) protect and restore rural and urban watershed health to improve watershed storage capacity...; 12) assist in the recovery of endangered, threatened, or migratory species by improving watershed health...; and 13) assist in water-related agricultural sustainability projects. (Water Code § 79732.)

The proposed project provides multiple benefits and will help achieve each of the above-cited Chapter 6 purposes. By implementing 73 structural and vegetative practices at four vineyards in the Sonoma Creek watershed, the project will: reduce erosion and sedimentation by storm-proofing almost three miles of road and disconnecting over 2.5 miles of road from stream crossings; provide flood protection by upgrading nine stream crossings to withstand a 100-year storm event; enhance habitat by re-vegetating 575 feet of riparian habitat; and conserve water and improve drought resilience by improving irrigation efficiency for almost 5,000 vines resulting in over 45 million gallons of water saved over ten years. The conservation practices to be implemented were identified through LandSmart Plans and irrigation system evaluations, both of which are comprehensive processes designed to identify and prioritize conservation needs within an agricultural property. The project will increase the long-term sustainability of the vineyards by increasing their resiliency to climate change by improving stormwater management and decreasing water needs.

Each of the private landowners involved with the project have committed to providing cost share for the project, the value of which (\$83,375) is included above.

The proposed project was selected through a competitive grant process under the Conservancy’s *Proposition 1 Grant Program Guidelines* adopted in June 2015 (“Prop 1 Guidelines”). (See § 79706(a)). The proposed project meets each of the evaluation criteria in the Prop 1 Guidelines as described in further detail in this “Project Financing” section, the “Project Summary” section and in the “Consistency with Conservancy’s Project Selection Criteria & Guidelines” section of this report.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

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

The proposed project is located in Sonoma County, one of the nine San Francisco Bay Area counties in which the Conservancy is authorized, under Sections 31160 and 31161 of the Public Resources Code, to undertake projects and award grants to address resource goals for the region.

Consistent with Section 31162, the Conservancy may undertake projects that will help to achieve specified goals for the San Francisco Bay Area Conservancy Program. Under Section 31162(b), the Conservancy may act to protect, restore, and enhance natural habitats and watersheds. The proposed project protects and enhances the Sonoma Creek watershed by implementing conservation practices at four vineyard sites that will reduce erosion and sedimentation, slow, spread, and sink stormwater, enhance habitat, conserve water, sequester carbon, and improve drought and climate change resilience.

The proposed project satisfies all of the criteria for determining project priority under Section 31163(c), as follows: The project (1) is supported by adopted regional plans including the *Bay Area Integrated Regional Water Management Plan* (updated 2013) and the *California Water Action Plan* (2014); (2) serves a regional constituency, in that the project is designed to improve water quality and quantity, improve habitat for state and federal special status species, and supports an important agricultural commodity of the state; (3) can be implemented and completed over the next three years; (4) provides opportunities that otherwise might be lost due to lack of sufficient funds for private landowners to improve their vineyard practices; and (5) includes matching funds as described in the Project Financing section.

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

Consistent with **Goal 13, Objective B** of the Conservancy’s 2013-2018 Strategic Plan, the proposed project will implement projects that assist small vineyard owners to steward the natural resources on their land.

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 completing environmental review for a suite of LandSmart conservation practices in Sonoma County, the project serves to promote and implement the goals of several state plans including:
 - *California @ 50 Million: The Environmental Goals and Policy Report* (Governor's Office of Planning and Research, 2013 Draft). Key Action #1 of the report is to "Preserve and Steward State Lands and Natural Resources" which includes the preservation of agricultural lands and working landscapes to support the state's agriculture and forestry industries in the most sustainable manner.
 - *CA Climate Adaptation Strategy/Safeguarding California: Reducing Climate Risk Plan* (California Natural Resources Agency, July 2014). The plan identifies "Actions Needed to Safeguard Agriculture" including soil conservation, innovating sustainable farm operation systems that integrate energy, water, and natural resource conservation, watershed protection, flood protection through restoration of streams and wetlands, and implementing management practices to store carbon in soil.
 - *California Water Action Plan* (California Natural Resources Agency, 2014). Goal #4, "Protect and Restore Important Ecosystems," calls for the restoration of coastal watersheds to benefit local water systems and eliminate barriers to fish migration. Goal #5 "Manage and Prepare for Dry Periods" calls for small scale tanks or impoundments to reduce extraction from streams during low flows. Goal #6 "Expand Water Storage Capacity and Improve Groundwater Management" calls for increasing groundwater recharge.
 - *California Wildlife Action Plan*. The project implements the action "Federal, state, and local agencies and nongovernmental organizations should work with regional landowners to develop and implement agricultural and rangeland management practices that are compatible with wildlife and habitat conservation."
4. **Support of the public:** The project is supported by State Senator Lois Wolk, California Assemblymember Marc Levine, Sonoma County Supervisor Susan Gorin, and the Sonoma County Winegrape Commission. Project letters are included as Exhibit 5.
5. **Location:** The proposed project is in Sonoma County, within the jurisdiction of the San Francisco Bay Area Conservancy Program.
6. **Need:** Without Conservancy funds, the project would not occur. While many large vineyard and wine companies have the resources and in-house expertise that equip them to conduct comprehensive conservation and water sustainability activities on their properties, smaller family vineyards often need assistance to fully realize these goals, as is the case with the vineyards that are the subject of this project.
7. **Greater-than-local interest:** The project will provide direct benefits to the diverse fish and wildlife of the Sonoma Creek watershed, including threatened steelhead trout and Chinook salmon, and endangered California freshwater shrimp. The watershed is also part of the Sonoma Valley Wildlife Corridor, an area that has been identified as an important wildlife habitat connector by the Bay Area Critical Linkages Project and Conservation Lands Network.

8. **Sea level rise vulnerability:** One of the four project sites is within a few hundred feet of Sonoma Creek at six feet above sea level. The property is higher than anticipated sea levels for 2100. In addition, the property is protected by a 12-foot-high levee that is regularly maintained and buffered by a large field that currently serves as a seasonal floodplain, both of which should safeguard the property from storm surges and anticipated rising sea levels.

Additional Criteria

9. **Urgency:** Without Conservancy funding to support the implementation of this project, the expected benefits - water quality, groundwater recharge, water conservation, habitat enhancement, carbon sequestration, and drought and climate change resiliency – would be lost or at least significantly delayed.
10. **Resolution of more than one issue:** By implementing 73 structural and vegetative practices at four vineyards in the Sonoma Creek watershed, the project will reduce erosion and sedimentation, slow, spread, and sink stormwater, enhance habitat, conserve water, sequester carbon, and improve drought and climate change resilience.
11. **Leverage:** See the “Project Financing” section above.
12. **Innovation:** The LandSmart program utilizes the most current information on effective land conservation practices and includes innovative techniques such as rainwater catchment systems to reduce stream diversions and carbon farming projects.
13. **Readiness:** All of the landowners have participated in the development of the project and are committed to implementing the work if funded and providing cost share for implementation. Sonoma RCD is prepared to work with the landowners to complete the implementation of the projects over the next three years.
14. **Realization of prior Conservancy goals:** See “Project History” above.
15. **Return to Conservancy:** See the “Project Financing” section above.
16. **Cooperation:** Sonoma RCD has a long history of extensive voluntary participation of landowners and a close partnership with the Natural Resources Conservation Service.
17. **Vulnerability from climate change impacts other than sea level rise:** Micheli, et al (2012) assessed the potential hydrologic impacts of climate change in the North San Francisco Bay Area (where the project is located) using four different scenarios. All scenarios indicated that precipitation would be less predictable, and that, even in “wet” years, the dry season would likely be longer, with precipitation concentrated during the mid-winter period. Extended dry season conditions and potential for extended drought lead to risks of fire, water quality impacts, and water shortage impacts to vineyard operations. The majority of the practices being proposed consist of compacted earthwork, rock, and steel culverts (vs. plastic culverts) and as such are not vulnerable to fire. In terms of water quality and water shortage impacts, the proposed project is designed to make vineyards more resilient to these risks.
18. **Minimization of greenhouse gas emissions:** Greenhouse gas emissions from construction will be minimized through the following measures: 1) placing staging areas for materials in close proximity to the construction site and choosing materials from quarries or vendors as close to a project site as practicable; 2) requiring contractors to limit equipment idling; and 3) hauling building or construction materials that are not recyclable or re-usable for another

project to the nearest waste disposal facility or construction and demolition recycling facility, rather than transporting such materials farther from the project site.

COMPLIANCE WITH CEQA:

Pursuant to the California Environmental Quality Act (“CEQA”), the Sonoma RCD, as lead agency, prepared the *Initial Study/Mitigated Negative Declaration (IS/MND) for Sonoma County LandSmart Program Coordinated CEQA Compliance (IS/MND)*. On April 28, 2016, the Board of Directors of the Sonoma RCD adopted the MND (Exhibit 2). The Sonoma RCD has prepared a draft Mitigation Monitoring and Reporting Program (MMRP) for the proposed project, which it intends to adopt prior to commencement of the project.

The IS/MND addresses the impacts of the conservation practices to be undertaken as part of the Sonoma County LandSmart Program. The LandSmart Program includes 17 conservation practices, drawn from established Conservation Practice Standards developed by the Natural Resources Conservation Service and designed to improve water quality and quantity issues, improve resilience to the impacts of climate change, and enhance fish and wildlife habitat across Sonoma County. Each of the on-the-ground structural and vegetative practices (73 in total) being implemented at the four identified vineyards is one of the 17 conservation practices identified in the IS/MND. The IS/MND identified potentially significant impacts of implementing the LandSmart Program conservation practices in the areas of biological resources, cultural resources, and hazards and hazardous materials. The IS/MND also identified mitigation measures that would avoid impacts, or reduce them below the level of significance, such that the LandSmart Program conservation practices would not result in significant adverse impacts on the environment.

Biological Resources. Implementation and maintenance of the LandSmart Program may result in temporary and minor impacts on biological resources. Program activities that have potential to result in short-term impacts include soil excavation, grading, preparation of the ground for seeding and mulching, grade and stream stabilization, channel excavation, construction of earthen embankments, placement of fill, vegetation removal, herbicide application, and burial, trampling or crushing of vegetation from equipment and foot traffic.

To avoid impacts to special-status plants and wildlife species, Sonoma RCD will implement mitigation measures to: avoid the loss of rare, threatened, or endangered plants and their habitats (BIO-1a), avoid listed special-status wildlife species (BIO-1b), protect listed salmonids (BIO-1c), protect California freshwater shrimp (BIO-1d), protect California tiger salamander (BIO-1e), protect California red-legged frog (BIO-1f), protect foothill yellow-legged frog (BIO-1g), protect northern western pond turtle (BIO-1h), protect nesting birds during construction (BIO-1i), protect northern spotted owl (BIO-1j), protect special-status bats (BIO-1k), protect special-status butterflies (BIO 1-l), protect American badger (BIO-1m), and protect Sonoma tree vole (BIO-1n).

LandSmart practices could potentially result in temporary or permanent fill of federally and State protected wetlands or waters of the U.S that may be present within LandSmart project areas. To reduce impacts to a less-than-significant level, Sonoma RCD will implement a compensatory mitigation program for impacts on wetlands that cannot be avoided (BIO-2).

USFWS has issued several Low Effect Habitat Conservation Plans for Sonoma County development projects in California tiger salamander (CTS) and California red-legged frog habitats. To ensure compliance with the existing requirements in local habitat conservation plans, the Sonoma RCD will determine if individual properties have an active habitat conservation plan or fall within the Santa Rosa Plain Conservation Strategy Area (BIO-3). Where a LandSmart practice is located within an area or on a property with an active habitat conservation plan, Sonoma RCD will ensure that the design and implementation of the practice is in full compliance with the biological goals, objectives, and requirements in the plan. The requirements may include specific surveys, preservation requirements, mitigation needs, and potential translocation requirements.

Cultural Resources: There is some potential for construction activities to impact historic, archeological, paleontological, and tribal cultural resources and disturb human remains. However, project activities are not expected to have a significant adverse effect because mitigation measures will be implemented to: identify and avoid or minimize impacts on historic resources (CR-1), identify and avoid or minimize impacts on archaeological resources (CR-2), establish procedures for encountering human remains (CR-3), avoid or document paleontological resources (CR-4), and identify and avoid or minimize impacts on tribal resources (CR-5).

Hazards and Hazardous Materials: Online data resources indicate that there are numerous leaking underground storage tanks and other contaminated soil and groundwater sites located throughout Sonoma County and within the LandSmart Program area. In the event that a LandSmart practice is located on or adjacent to a contaminated site, or where contaminated soil or groundwater could be encountered during construction, Sonoma RCD will require site-specific preconstruction assessments to identify hazardous material sites and, if present, the project will be moved to an uncontaminated location or a site health and safety plan to protect construction workers and the environment will be prepared (HAZ-1). With implementation of the mitigation measure, the LandSmart Program's potential impact related to hazardous materials will be reduced to a less-than-significant level.

According to California Department of Forestry and Fire Protection (CalFire) mapping, properties within the LandSmart Program area are designated as very high fire hazard severity zone (CalFire 2008). In the event that implementation of a LandSmart practice requires construction within an area designated as a very high fire hazard severity zone, the potential for construction activities to cause a wildland fire could be significant. Sonoma RCD will use construction techniques that will reduce the likelihood of wildland fires during construction of LandSmart practices that may be located in high wildland fire hazard zones (HAZ-2). Implementation of the mitigation measure will reduce the impact to a less-than significant level.

Staff has independently reviewed the IS/MND and has determined that the proposed conservation practices are within the scope of the IS/MND and are adequately described in the IS/MND, and that there is no substantial evidence that the project, as mitigated, may have a significant effect on the environment.

Staff will file a Notice of Determination upon approval of the project.