

COASTAL CONSERVANCY

Staff Recommendation
February 2, 2017

**SONOMA CREEK WATERSHED STREAM RESTORATION AT THE SONOMA
DEVELOPMENTAL CENTER**

Project No: 16-048-01
Project Manager: Avra Heller

RECOMMENDED ACTION: Authorization to disburse up to \$275,257 to the Sonoma Ecology Center (SEC) for riparian restoration and anadromous fish habitat improvement on the Sonoma Developmental Center (SDC) property in Eldridge, Sonoma County.

LOCATION: Sonoma Developmental Center, Eldridge, Sonoma County

PROGRAM CATEGORY: San Francisco Bay Area Conservancy

EXHIBITS

Exhibit 1: [Project Location and Site Maps](#)

Exhibit 2: [Project Letters](#)

Exhibit 3: [Project Photos](#)

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 the disbursement of an amount not to exceed two hundred seventy-five thousand two hundred fifty-seven dollars (\$275,257) to the Sonoma Ecology Center (SEC) to conduct riparian restoration and anadromous fish habitat improvement work on the Sonoma Developmental Center’s (SDC) property in Eldridge, Sonoma County. This authorization is subject to the following conditions:

1. The project shall not commence and no Conservancy funds shall be disbursed for the project until the Executive Officer of the Conservancy has reviewed and approved in writing:
 - a. A detailed work program, schedule, and budget.
 - b. Names and qualifications of any contractors to be employed in carrying out the project.
 - c. A signage plan that acknowledges Conservancy funding.

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- d. Documentation that SEC has obtained all permits and approvals required for the project under federal, state, and local law.
- e. A signed agreement among the Conservancy, SEC, and SDC providing SEC with permission to plan, install, monitor and maintain the project and to supervise limited access for volunteer workdays and educational visits. This agreement shall allow for SDC to maintain the project beyond the scheduled closure of the SDC facility in 2018.

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. SEC is a nonprofit organization existing under section 501(c)(3) of the U.S. Internal Revenue Code, and whose purposes are consistent with Division 21 of the Public Resources Code.
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PROJECT SUMMARY:

The proposed project will expand Sonoma Ecology Center’s (SEC’s) long-term stream restoration efforts on Sonoma Creek to new sites at the Sonoma Developmental Center (SDC), a state-run facility serving people with developmental and intellectual disabilities. It will enhance habitat for steelhead trout and other stream-dependent species, improve stormwater quality entering Sonoma Creek by reducing the amount of erosion and polluted runoff entering Sonoma Creek, engage the community and SDC staff in conservation efforts, and conduct planning for larger scale restoration projects on priority reaches within the Sonoma Creek watershed. This project will conduct stream restoration across a one-mile length, with activities that will include invasive weed control, storm drain system upgrades, volunteer engagement, and stream monitoring. Weed control will occur intermittently over the entire one-mile reach within the riparian setback, an area of approximately 6.5 acres. Nine native plant community protection areas, coupled with five outfall remediation sites, cover an area of approximately one-half acre. This project will take place in conjunction with related work upstream of the proposed site, leveraging funding provided to SEC by EPA Water Quality Improvement Fund and California Wildlife Conservation Board grants. Additionally, SEC has been continuously monitoring the mainstem of Sonoma Creek which runs through SDC for over a decade, providing continuous data collection of turbidity and other water quality parameters that support California’s Total Maximum Daily Load (TMDL) implementation goals. The benefits of the proposed restoration work will consequently be regularly monitored and recorded.

The proposed project will include designing, gaining the necessary permits for, and installing five Detention-Basin Energy Dissipaters (D-BEDs) at designated storm drain outfalls on Sonoma Creek. D-BEDs provide benefits for an unlimited amount of time in that once established they

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will decrease erosion, improve bank stability, and provide filtration services without needing any maintenance. Their sediment retention benefits, however, will decrease over time if they are not maintained. All sites will receive supplemental erosion control and revegetation. SEC will recruit local youth to join their EnviroLeader program that provides Sonoma Valley teens with the opportunity to gain essential job and life skills through practical, and paid, environmentally focused apprenticeships. Participants gain on-the-job experience conducting invasive weed removal, native plant revegetation, and other streambed stabilization work. The project will also include community engagement events (at least 5 events with up to 30 participants per event) such as volunteer creek cleanups and restoration workdays for SDC staff, elected officials, and the general public; educational tours of restoration sites; and onsite demonstrations of stormwater management techniques. Community outreach will be conducted via print and radio publicity (at least 3 pieces), and TV publicity (one 1.5-minute video will be produced and aired on KRCB Television).

In addition to the implementation described above, the proposed project includes assessment, analysis and planning for the next phase of restoration at the site. Proposed planning includes reviewing stormwater detention options at 1 to 3 identified high-priority sites, collecting streamflow measurements, water quality and chemistry monitoring (to be conducted with funding from Trout Unlimited and the Wildlife Conservation Board (WCB)), as well as the installation of 5 temporary remote-sensing cameras to track use of SDC's riparian area by local wildlife. Finally, the project will include overall data analysis and dissemination of findings. SEC will share findings by developing communications products for the general public, and presenting results in forums such as the Sonoma Valley Groundwater Management Program, the Salmonid Restoration Forum, and various regional wildlife forums.

The Sonoma Ecology Center (SEC) is a nonprofit organization whose mission, for over 25 years, has been to work with the community to identify and lead actions that achieve and sustain the ecological health of Sonoma Valley. SEC's main office is on the SDC campus, and providing natural resources services to the state is part of SEC's lease agreement. In 1997, SEC identified the SDC property as a critical linkage between Sonoma Mountain and the Mayacama Mountains, and succeeded in having the area formally recognized as a wildlife corridor in Sonoma County's General Plan, the first of its kind. Over the years, several projects have been conducted to enhance fish habitat and reduce sediment pollution in support of state and federal water quality and rare species mandates, including enhancing fish passage and riparian habitat on SDC's tributaries to Sonoma Creek. The Sonoma Ecology Center is also a core member of the SDC Coalition,¹ a diverse group of stakeholders working together to plan for the future of the social services and natural heritage of SDC.

Site Description: The Sonoma Developmental Center (SDC) is located on approximately 900 acres near Glen Ellen in Sonoma County. SDC opened in 1891 and is one of four State-operated facilities within the California Department of Developmental Services (DDS) that serves as a residential facility for people with severe developmental disabilities. Approximately 350 people currently reside on the SDC campus. SDC is expected to close in 2018 as part of a larger California legislative process to close the remaining large institutional residential centers and

¹ The SDC Coalition is headed by Sonoma County Supervisor Susan Gorin. Please see the support of the public section on page 8 to see a full list of SDC Coalition members.

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change the care system to one of community-based care in smaller group homes along with the creation of 21 non-residential regional centers. Because of this situation, staff recommends conditioning the grant on the signing of an agreement among the grantee, the landowner, and the Conservancy, outlining the nature of the relationship between the three organizations, and ensuring that SEC staff will be able to monitor and maintain the project for the its expected lifetime. Because the entirety of the project is occurring within a stream setback, any new owner would have to abide by existing regulatory restrictions which would limit developmental activities in this area, functionally protecting this project's improvements. SEC will maintain all aspects of the project for the timeline presented in their grant application (through October 2019), and is committed to maintaining restoration efforts (future weed removal and potential planting/replanting native vegetation as needed) as new funding opportunities arise.

The riparian corridor of Sonoma Creek through SDC is approximately one-mile-long and contains some of the few remaining intact floodplains in the watershed. The floodplain and riparian areas have a well-established but narrow band of mature trees at the top of the bank and alder and willow along the creek bed. Although the tree canopy cover is good, much of the understory is comprised of invasive weed species, including Himalayan blackberry (*Rubus armeniacus*), Smilo grass (*Piptantherum miliaceum*), poison hemlock (*Conium maculatum*), periwinkle (*Vinca major*), French broom (*Genista monspessulana*), tree-of-heaven (*Ailanthus altissima*), giant reed (*Arundo donax*), and other annual and perennial weeds. The reach also contains small clusters of native plant species, including field sedge (*Carex praegracilis*), Torrey's melic, (*Melica torreyana*), oat grass (*Danthonia californica*), gray rush, (*Juncus patens*), creeping wild rye, (*Leymus triticoides*), beeplant (*Scrophularia californica*), snowberry (*Symphoricarpos albus*), pipevine (*Aristolochia macrophylla*), and various fern species. SDC's critical role in creating a habitat linkage across Sonoma Valley is based on intact connections between the riparian forest on SDC's property and adjacent open space parcels: Sonoma Valley Regional Park, Jack London State Historic Park, and several protected private parcels. The section of Sonoma Creek which runs through SDC's property is the one of the only sections of the creek that is publicly owned on both sides, making it a unique conservation opportunity.

As prioritized in the Prop 1 evaluation criteria, this project benefits an identified disadvantaged community. The implementation component of this project is located in the Disadvantaged Community Block Groups near Glen Ellen. In addition, this project will benefit the Disadvantaged Community Block Groups near Boyes Hot Springs, El Verano, and the City of Sonoma, the Disadvantaged Community Tract along Highway 12 just north of Boyes Hot Springs, and the Disadvantaged Community Place near the City of Sonoma. The above listed disadvantaged communities will benefit from this project by: a) residents from these areas participate in SEC's community planting and educational events, b) youth from these areas are specifically recruited to become EnviroLeader teen interns with SEC, and they will be part of the labor force for this project, and c) benefits of the project in terms of fisheries, water quality, and stormwater detention continue downstream to locations such as Larson and Maxwell Parks where people from disadvantaged communities swim and recreate along Sonoma Creek.

Project History: The Conservancy has successfully worked with the Sonoma Ecology Center (SEC) on several previous watershed projects involving landowner partnerships. A Nathanson Creek project, for which the Conservancy provided \$188,879, was strongly focused on community engagement in stream restoration for lands owned by the City of Sonoma and

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Sonoma Valley Unified School District. SEC conducted restoration training, and hands-on restoration events with students, families, and other community members. Additionally, the Mill Creek Headwaters Restoration, for which the Conservancy contributed \$173,707, involved work with the California Department of Parks and Recreation at Jack London State Historic Park to restore a high value headwaters connection in Mill Creek to Sonoma Creek to stop primary sources of excess stream sediment from going into Sonoma Creek.

PROJECT FINANCING

Coastal Conservancy	\$275,257
EPA Water Quality Grant to Sonoma County Permit and Resource Management Department	\$305,000
California Wildlife Conservation Board	\$20,000
Project Total	\$600,257

The expected source of funding for \$259,359 of this authorization, to support the planning and implementation portions of this proposal, is the fiscal year 2016/17 appropriation to the Conservancy from the “Water Quality, Supply, and Infrastructure Improvement Act of 2014” (Proposition 1, Division 26.7 of the Water Code, § 79700 et seq.). Funds appropriated to the Conservancy derive from Chapter 6 (commencing with Section 79730) and may be used “for multi-benefit water quality, water supply, and watershed protection and restoration projects for the watersheds of the state” (Section 79731). Section 79732(a) identifies the specific purposes of Chapter 6, of which the following pertain to this project: protect and increase the economic benefits arising from healthy watersheds, fishery resources and in-stream flows (subsection (a)(1)); protect and restore aquatic, wetland and migratory bird ecosystems including fish and wildlife corridors (subsection (a)(4)); protect and restore coastal watersheds (subsection (a)(10)); reduce pollution or contamination of rivers and streams, and protect or restore natural system functions that contribute to water supply, water quality, or flood management (subsection (a)(11)); and assist in the recovery of endangered species by improving watershed health, instream flows, and fish passage (subsection (a)(12)).

As required by Proposition 1, the proposed project provides multiple benefits. By completing designs for streambank stabilization, culvert improvement, and native revegetation, the project will help restore the water quality and health of Sonoma Creek, aid in the recovery of an endangered species, and aid in the restoration of the local fishery which will provide economic benefit to the coastal communities around the Sonoma Creek watershed.

The proposed project was selected through the third-round competitive grant process under the Conservancy’s *Proposition 1 Grant Program Guidelines* adopted in June 2015 (see § 79706(a)). The proposed project meets each of the evaluation criteria in the Proposition 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.

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The expected source of funds for the remaining \$15,898 needed to cover the community engagement aspects of this proposal will be an appropriation from the California Beach and Coastal Enhancement Account of the California Environmental License Plate Fund (Vehicle Code Section 5067), which is derived from sales of the Whale Tail® License Plate, an official “specialty” license plate issued by the California Department of Motor Vehicles for cars registered in California. The Whale Tail funds may be granted for projects throughout the coast and San Francisco Bay Area that are consistent with the purposes of Division 21 of the Public Resources Code (Vehicle Code Section 5067(c)(1)).

\$305,000 in cost share funds for this project proposal come from an EPA funded Water Quality grant, through which Sonoma Ecology Center (SEC) is funded to do work to improve the quality of Sonoma Creek. SEC is also proposing \$20,000 in match from the California Wildlife Conservation Board for streamflow monitoring in Sonoma Creek. Finally, SEC proposes an estimated value of \$2,400 in-kind match, in the form of staff time, mainly that of their communication and outreach personnel, as well as some administrative support.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

This project is undertaken pursuant to Chapter 4.5 of the Conservancy’s enabling legislation, Public Resource Code Sections 31160-31165, to address resource goals in the San Francisco Bay Area. Section 31162 of the Public Resources Code authorizes the Conservancy to undertake projects and award grants in the nine-county San Francisco Bay Area, including Sonoma County. All of the proposed project area is within Sonoma County. Under Section 31162(b), the Conservancy may act to protect, restore, and enhance natural habitats, connecting corridors, and watersheds of regional significance. The proposed project will assist in the enhancement of an anchor watershed for steelhead trout in the Bay Area.

The proposed project satisfies all of the criteria for determining project priority under 31163(c), since the project: 1) is supported by adopted regional plans including the Sonoma County General Plan, the Sonoma Creek Watershed Sediment TMDL and Habitat Enhancement Plan (San Francisco Bay Regional Water Quality Control Board, 2008), the Steelhead Restoration and Management Plan for California (California Department of Fish and Wildlife, 1996, updates to Steelhead Tasks in 2013), the Central California Coast Steelhead Recovery Plan (National Marine Fisheries Service, Draft Document), North Coast Water Quality Control Plan (Basin Plan) for the North Coast Region (State Water Resources Control Board), and Biodiversity Action Plan (Sonoma County Community Foundation/ Sonoma County Water Agency); 2) serves a regional constituency by creating access to habitat for steelhead trout, a special status species; 3) can be implemented in a timely manner; 4) provides benefits to anadromous fish that will be lost if the project is not quickly implemented; and 5) will include significant matching funds from the U.S. Environmental Protection Agency (EPA) via Sonoma County’s Permit & Resource Management Department.

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

Consistent with **Goal 5, Objectives D, E, and G** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will:

- Objective 5D: "Implement projects that preserve [and] enhance... coastal watersheds and floodplains," by enhancing the riparian corridor and floodplain on Sonoma Creek, a coastal watershed.
- Objective 5E: "Implement projects to improve fish habitat including projects to remove barriers to fish passage, ensure sufficient instream flow, and provide in stream habitat and favorable water temperatures," by infiltrating and slowing runoff and increasing the quantity, diversity, and extent of native riparian vegetation.
- Objective 5G: "Implement projects to improve water quality to benefit coastal and ocean resources," by reducing sediment concentrations in the water column, reducing fine sediment delivery to gravels, and reducing water temperatures.

**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 restoring riparian areas and implementing best management practices, consequently decreasing both energetic and polluting stormwater impacts, as well as increasing the extent of native riparian vegetation, the project serves to promote and implement several statewide plans and policies including:
 - *California Water Action Plan* (California Natural Resources Agency, California Environmental Protection Agency, and California Department of Food and Agriculture, 2014). Goal #4, "Protect and Restore Important Ecosystems," will be addressed through riparian habitat restoration and reduction of erosion and pollution runoff into Sonoma Creek. Goal #5, "Manage and prepare for dry periods," will be addressed by increasing infiltration into streambanks, increasing water-holding capacity of streambanks, and planning for future projects to increase dry-season stream flow. For Goal #6, "Expand water storage capacity and improve groundwater management," this project will address enhance infiltration and water-holding capacity of Sonoma Creek's riparian areas, a major groundwater recharge location.

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- *Steelhead Restoration and Management Plan for California* (CDFW, February 1996, with updates to Steelhead Tasks in 2013). This CDFW document provides strategies to restore native and naturally produced (wild) stocks of steelhead, including restoring habitat that is degraded. This project will specifically address:
 - Task CC-06-214-01: Remove, reduce, and control non-native invasive plant species.
 - Task CC-06-214-03: ...remediate upslope and riparian sources of sediment including those from road infrastructure...
 - Task CC-06-214-04: ... enhance native riparian vegetation.
- *Draft Recovery Plan for Central California Coast Steelhead (Interior San Francisco Bay)* (NOAA NMFS 2015). The project furthers:
 - Action SoC-CCCS-8.1.1.3 Remediate upland [sediment] sources.
 - Action SoC-CCCS-10.1.1.1 Rehabilitate or restore riparian corridor conditions within all current and potential high value habitat summer rearing areas.
 - Action SoC-CCCS-10.1.1.3. Implement comprehensive evaluation and monitoring program to determine areas where poor riparian habitat is contributing to increased water temperatures limiting juvenile steelhead survival and summer rearing habitat potential.
 - Action SoC-CCCS-22.1.2.2 Rehabilitate areas where existing and dilapidated infrastructure impairs the quality of floodplain and winter rearing for habitat for steelhead within in the upper Sonoma Creek watershed.
 - Action SoC-CCCS-22.1.3.1 Encourage and identify opportunities for onsite rain retention facilities.
 - Action SoC-CCCS-23.1.2.2 Address sediment and runoff sources from road networks and other actions that deliver sediment and runoff to stream channels.
- *California @ 50 Million: The Environmental Goals and Policy Report* - This project addresses the EGPR goal to steward and protect natural resources and working landscapes by advancing Action 6: Build resilience into natural systems and prioritize natural and green infrastructure solutions.
- *CA Climate Adaptation Strategy/Safeguarding California: Reducing Climate Risk Plan*: The Safeguarding California Plan identifies actions needed to safeguard biodiversity and habitats. This project will advance Action 1: Improve habitat connectivity and protect climate refugia. Restoration along Sonoma Creek will both improve instream and riparian habitat and provide habitat connectivity between upstream and downstream habitat areas.
- *State Wildlife Action Plan (SWAP)*: Sonoma Creek watershed is included in two regions of the SWAP, the North Coast & Klamath Region, and the Bay Delta & Central Coast Region. Steelhead Trout and California Freshwater Shrimp have been identified as the species of greatest conservation need in this area. This project contributes to the recovery of these species by reducing rapid runoff into streams, reducing levels of sediment, pesticides, and road-related pollutants in runoff, and increasing the canopy of native riparian vegetation.

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- *Sonoma Creek Watershed Sediment TMDL and Habitat Enhancement Plan. (San Francisco Bay Regional Water Quality Control Board. 2008)* This project is consistent with the sediment reduction, water quality and vegetative improvement goals of this site-specific plan.
4. **Support of the public:** The project has widespread public support, including that of State Senator Mike McGuire, State Assembly member Mark Levine, Sonoma County Supervisor Susan Gorin (who heads the SDC Coalition), and the Sonoma Developmental Center. The project is enthusiastically supported by the SDC Coalition, a diverse group of stakeholders working together to plan for the future of the social services and natural heritage of SDC. Core members include SEC, the Parent Hospital Association, and Sonoma Land Trust. Other members include Audubon Canyon Ranch, County of Sonoma, Sonoma County Agricultural Preservation and Open Space District, Sonoma County Department of Health Services, Sonoma County Board of Supervisors, Sonoma County Regional Parks Department, Sonoma County Water Agency, Sonoma Mountain Preservation, Valley of the Moon Natural History Association. Project letters are included as Exhibit 2.
 5. **Location:** This project is located on the Sonoma Developmental Center property, in the community of Eldridge in Sonoma County, within the jurisdiction of the San Francisco Bay Area Conservancy Program.
 6. **Need:** The SDC property is one of the largest areas of public lands containing the main stem of Sonoma Creek. This reach of Sonoma Creek has been considerably altered over time, but has several intact floodplains that provide some of the best opportunities for restoration of riparian habitat in the valley. This project will bring attention and care to this important resource, attracting support, additional future funding and the momentum to make improvements and provide long-term conservation of the area's natural resources. Funding is needed at this juncture, prior to closure of the facility, as support is needed now to initiate restorative actions, but also to instill awareness and build support for the long term protection of these natural resources.
 7. **Greater-than-local interest:** The recovery of California's steelhead trout populations is of regional significance. Moreover, sport and commercial fishing provides an important economic benefit to California.
 8. **Sea level rise vulnerability:** The project is not located in an area close to a shoreline that is vulnerable to sea level rise.

Additional Criteria

9. **Urgency:** The Sonoma Developmental Center is scheduled to close in 2018, after which the status and use of the property is uncertain. This project will ensure that natural resource enhancements done now are maintained for many years after its closure, which will help ensure that this property is protected and managed in a way that benefits and sustains the area's natural resources. Appropriate agreements will be implemented as part of this project's approval.
10. **Resolution of more than one issue:** This project is an integrated, multi-benefit project designed to enhance fish and wildlife habitat, improve water quality, provide opportunities

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for community participation, collect data to inform current and future land management decisions, and educate the public about all of the above issues.

11. **Leverage:** See the “Project Financing” section above.
13. **Innovation:** SEC has previously developed a replicable remediation strategy that includes a small detention basin below a stormwater outfall that dissipates the energy of the runoff and allows it to sheet-flow over a vegetated berm. The Detention-Basin Energy Dissipator (D-BED) collects sediments and other pollutants treated as the water flows through the biological filter. This device prevents scouring of the bank, thereby reducing sediment delivery to the creek and preventing bank failure and property loss. Outfalls on SDC property are suitable candidates for remediation using this innovative structure, which will demonstrate methods to slow the velocity of water to improve infiltration for groundwater recharge and prolong summer creek flow to benefit fish and wildlife. The dissipation and detention of stormwater will also remove pollutants harmful to fish and wildlife.
14. **Readiness:** SEC is ready to begin acquiring the necessary permits and approvals as soon as the necessary funding is obtained. Planting and installation processes will occur concurrent with appropriate seasons, and can begin as soon as permits are secured and seasonal work can begin.
15. **Realization of prior Conservancy goals:** See “Project History” above.
16. **Return to Conservancy:** See the “Project Financing” section above.
17. **Cooperation:** The project benefits from the cooperation of the wide range of partners involved in stewarding the Sonoma Developmental Center, termed the SDC Coalition. See “Support of the Public” above. Please note that SEC reached out to the California Conservation Corps (CCC) in March 2016. CCC responded that they would not be able to assist this project.
18. **Vulnerability from climate change impacts other than sea level rise:** Sonoma Valley’s streams, and the wildlife that depend on them, can expect to experience more significant floods, more heat, more variable streamflow, and new invasive species. This project will reduce vulnerability to these impacts by infiltrating runoff, shading the stream and riparian area, increasing the shear strength of streambanks by increasing root density, and increasing the area of native riparian habitat. To improve the project’s resilience to these impacts, SEC uses a diverse mix of native species in riparian restoration projects. This diversity, including species adapted to wet, moist, and dry conditions, provides the greatest degree of resilience to adapt to climate change. SEC restoration phases invasive species control and native plant establishment to allow for transitional changes to the environment. This incremental approach is less disruptive, minimizes transition period impacts, and allows continuous use of surrounding habitat by fish and wildlife. Any reduction of transition period impacts is an accommodation to species for environmental change, and similarly strengthens resilience to climate change. A healthier, more diverse plant community is more able to adapt to climate change and provides more reliable habitat for fish and wildlife.
19. **Minimization of greenhouse gas emissions:** Minor sources of short-term emissions include use of power tools for mowing and augering for plant installation, travel, and materials delivery. SEC is located adjacent to worksites, and propagates plant material less than 10

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miles away, which minimizes travel distances. Native plants and trees installed over the course of the project will mitigate for any loss of vegetation and carbon sequestration provided by invasive plants removed during the project.

COMPLIANCE WITH CEQA:

The implementation portion of the proposed project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to 14 Cal. Code of Regulations Section 15304 – Minor Alterations to Land. The project activities, which include removing non-native plant species along a 1-mile riparian corridor and replacing those species with native plants as well as installing D-BEDs at storm drain outfalls, constitute minor alterations in the condition of land, water and vegetation which do not involve removal of healthy, mature, scenic trees.

The planning and monitoring portions of the proposed project are exempt from CEQA pursuant to 14 Cal. Code of Regulations Sections 15262 (feasibility or planning studies for possible future actions) and 15306 (basic data collection, research, experimental management and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource).

Upon Conservancy approval, staff will file a Notice of Exemption.