

COASTAL CONSERVANCY

Staff Recommendation
January 18, 2018

Restoring Coho Habitat in San Geronimo Creek

Project No. 08-040-03
Project Manager: Joel Gerwein

RECOMMENDED ACTION: Authorization to disburse up to \$199,385 to the Marin County Resource Conservation District to restore coho salmon habitat in San Geronimo Creek in the community of San Geronimo in Marin County.

LOCATION: San Geronimo, Marin County

PROGRAM CATEGORY: Integrated Coastal and Marine Resources Protection

EXHIBITS

- Exhibit 1: [Project Location](#)
- Exhibit 2: [Initial Study-Mitigated Negative Declaration, Mitigation, Monitoring and Reporting Plan, and Site-Specific Environmental Checklist](#)
- Exhibit 3: [Project Designs](#)
- Exhibit 4: [Site Photographs](#)
- Exhibit 5: [Project Letters](#)
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RESOLUTION AND FINDINGS:

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

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed one hundred ninety-nine thousand three hundred eighty-five dollars (\$199,385) to the Marin County Resource Conservation District (“MRCD”) to restore coho habitat in San Geronimo Creek at the McGuinn-Newman property (Exhibit 1).

This authorization is subject to the following conditions:

1. Prior to the disbursement of funds, MRCD shall submit for the review and approval of the Conservancy’s Executive Officer:
 - a. A work program, including names and qualifications of any contractors to be retained, and the schedule and budget, for the project.
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- b. A plan for acknowledging Conservancy funding.
 - c. A written agreement between the MRCD and the landowners allowing the project to be implemented, maintained, and monitored, and protecting the public interest in the project.
 - d. Any other agreements determined necessary for the project by the Conservancy's Executive Officer.
2. Conservancy funding shall be acknowledged by erecting and maintaining a sign or signs on or adjacent to the project area, the design and placement of which has been reviewed and approved by the Executive Officer, or by some other alternative form of acknowledgement, appropriate to the project and approved by the Executive Officer.
 3. MRCD shall monitor and ensure compliance with any permit or approval for the project and with the provisions of the *Mitigation, Monitoring and Reporting Plan for San Geronimo Creek: Restoring Coho Habitat Project*, attached to the accompanying staff recommendation as Exhibit 2.”

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 5.5 of Division 21 of the Public Resources Code, regarding Integrated Coastal and Marine Resources Protection.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Conservancy has independently reviewed and considered the information contained in the *Initial Study and Mitigated Negative Declaration for the Marin Coastal Watersheds Permit Coordination Program*, adopted by the MRCD on November 10, 2010, and the associated public comments, attached to the accompanying staff recommendation as Exhibit 2, and finds that no additional CEQA documentation is required and that the project, as mitigated, will avoid, reduce or mitigate the possible significant environmental effects of the project to a level of insignificance, and that there is no substantial evidence that the project will have a significant adverse effect on the environment.”

PROJECT SUMMARY:

Staff is recommending the Conservancy authorize the disbursement of up to \$199,385 to the MRCD to construct in-stream and floodplain habitat improvements for coho salmon and other species in San Geronimo Creek at the McGuinn-Newman Property in the community of San Geronimo (Exhibits 1 and 3). The MRCD and its contractors will install 18 logs and 10 rootwads anchored with boulders in the channel in a 370-foot reach of San Geronimo Creek, at and adjacent to the confluence with Larsen Creek. In addition, willows, alders, and other riparian vegetation will be planted in the project area. The vegetation and large wood structures will serve to stabilize eroding creek banks and protect adjacent property, and will restore winter high flow refugia and sheltered, shaded summer rearing habitat for salmonids. The proposed design will stabilize the stream banks and prevent further channel incision by installing willow-planted boulder and wood structures. These structures will direct the stream's erosive forces

away from the toe of the bank. The type of boulder-wood structures proposed for this site are naturally occurring in adjacent reaches of San Geronimo Creek. The project will divert high flows away from vertical banks, enhance riffle habitat, and create low-velocity edge habitat downstream from the Larsen Creek confluence.

This project will aid the recovery of an important population of coho salmon and steelhead trout. The San Geronimo Creek watershed is the largest undammed tributary to Lagunitas Creek that supports coho salmon and steelhead trout, listed species under the State and Federal Endangered Species Act. Lagunitas Creek has been identified as one of the most important waterways left for wild Central California coho salmon, and hosts a robust population of steelhead and a small population of Chinook salmon as well. In the 1950s, the watershed's annual coho population was approximately 6,000. In recent years, the coho population has averaged approximately 500 adults, with some runs as small as 50 individuals, a fraction of the historic population size. Nonetheless, the Lagunitas Creek coho population, though greatly reduced, represents 10% to 20% of all wild California coho surviving today. Within the overall Lagunitas Creek watershed, San Geronimo Creek alone contributes to roughly 30% of the coho salmon. Salmon spawning and rearing surveys have been repeatedly documented salmonid use of this reach.

The project will restore high flow refugia for salmonids, which were identified as critical in the *Limiting Factors Analysis for Lagunitas Creek* (Stillwater Sciences 2008). High winter and spring flows negatively impact juvenile coho salmon, sweeping them downstream prematurely, out of the upper watershed where they typically rear over the summer. The proposed engineered wood structures and riparian plantings will work to slow flows down and provide refugia. The structures and plantings will also help to create deep, cold-water pools, which are lacking throughout this stretch of San Geronimo Creek. The project will help implement the National Marine Fisheries Service (NMFS) 2012 *Recovery Plan for Central California Coho Salmon*, specifically by furthering the following actions:

- Recovery Action Step 2.2.1.3: Promote restoration projects designed to create or restore alcove, backchannel, ephemeral tributary, or seasonal pond habitats.
- Recovery Action Step 3.1.1.2: Increase shelter ratings to optimal conditions (>80 pool shelter value) by installing multiple log structures in select reaches of Larsen, San Geronimo, Woodacre, and Olema Creeks.
- Recovery Action Step 3.1.4.3: Increase Large Woody Debris (LWD) frequency to optimal conditions (>6 key LWD pieces/100 meters) in select reaches of Larsen, Woodacre, San Geronimo, and Devils Gulch Creeks.

An additional project objective is preventing channel incision from migrating upstream along San Geronimo Creek. There is evidence of approximately 2 ft of incision in the form of exposed roots in the channel-reach downstream from the proposed project. Currently, the 100-ft stream reach located adjacent to the toe of the eroding bank has a steeper gradient than adjacent stream reaches, indicating that incision may be migrating upstream. If incision does migrate upstream, aquatic habitat would be further degraded and bank erosion would be exacerbated. The conceptual design includes two large wood and boulder structures designed to maintain channel gradient (and turn flows away from the toe of the bank), preventing additional channel incision from continuing to migrate upstream.

In the San Geronimo Valley, significant human impacts such as loss of riparian habitat, lack of channel complexity and wood, fish passage barriers, changes to the hydrograph, and excessive sedimentation continue to threaten the viability of the ecosystem as a whole. Projects that address these concerns are a high priority. The County of Marin's 2009 *San Geronimo Valley Salmon Enhancement Plan*, whose preparation was partially funded by the Conservancy, recommended projects like this one to restore salmon habitat on private lands. Following the recommendations of the Plan, the Conservancy and the California Department of Fish and Wildlife (CDFW) provided funds to the County to create the San Geronimo Valley Landowners Assistance Program in partnership with the San Geronimo Valley Planning Group (SGVPG) and UC Cooperative Extension (UCCE). The program delivered parcel evaluations for 40 landowners with written recommendations for restoration on each property. Additionally, 100% design plans, specifications, and cost estimates were developed for 10 instream restoration projects, prioritized by a technical review team that included representatives from SCC, CDFW, NMFS, Regional Water Quality Control Board, Marin Municipal Water District and County of Marin Public Works. The proposed project is one of the three highest priority projects developed under this program.

This project is unusual in that it will support salmon enhancement on private land with an eager and willing landowner who wants to make a difference. It is rare that a landowner is willing to engage in such technical projects, placing and anchoring large wood in-stream for fish. Instream installation of large wood structures requires engineered designs that take into account fish habitat requirements, hydraulic modeling of flow conveyance, and potential threats to downstream structures should the wood be mobilized by high flows. This particular homeowner has remained committed to this project for over seven years and acts as a leading example of private collaboration with public agencies for conservation. The community is watching the project closely. The implementation of this project is expected to encourage and inspire landowners in the Landowner Assistance Program to become engaged in salmon habitat restoration on their properties. It is one of the first projects that will come from the valley's private landowners through the program.

MRCDD is highly qualified to carry out this project. The project will be managed through MRCDD's Urban Streams Program (USP). The USP was created in 2014 because of Marin County's Stream Conservation Area Ordinance. The role of the USP is to provide support and assistance to the residents that live along Marin County's creeks through educational workshops, presentations, watershed tours and site visits that can result in targeted restoration actions. Through the USP, MRCDD has organized creek cleanups and stewardship days and workshops on restoration, water conservation, and water quality. The USP works with County departments such as the Marin Watershed Program and Community Development Agency, in addition to watershed and neighborhood organizations and associations. Through collaborative efforts with local, state and federal regulatory agencies, the USP guides property owners through the challenging permitting process when applying for projects that include development and/or restoration along the creeks of Marin. In addition to the USP work it has conducted since 2014, MRCDD has a long history of successful implementation of restoration and enhancement projects on private lands in Marin.

Site Description: The project site is located along San Geronimo Creek, at the confluence of San Geronimo and Larsen Creeks, across from the San Geronimo Valley Community Center. The surrounding land use is primarily residential. Other nearby land uses include grazing land,

protected open space (Maurice Thorne Memorial and French Ranch Open Space Preserves), and the San Geronimo Valley Golf Course, which is currently in the process of being acquired for open space protection. The project is primarily located on property owned by Allan Newman and Donna McGuinn (APN#: 169-071-20); the McGuinn-Newman's residence is located near the creek bank. A portion of the project is also located on the adjacent upstream property. Currently, there is no large woody debris in the project area. There is existing native riparian vegetation such as buckeye, Oregon ash, snowberry, alder, bay laurel, and rush. However, existing vegetation is not adequate to stabilize the streambanks in this reach.

Project History: As described above, this project was developed through the San Geronimo Valley Salmon Enhancement Plan, which was partially funded by a Conservancy grant of \$100,000 to the County of Marin in 2008. The Plan was followed by a Landowner Assistance Program, which was partially funded by a Conservancy grant of \$98,335 to the County of Marin in 2010. The initial design work for the project was prepared as part of the Landowner Assistance Program. Additional work to take the plans from 30% to 100% design was funded by CDFW through a grant of \$93,930 to the County. MRCD submitted a proposal for this project to the Conservancy's Proposition 1 grant round in May 2017.

PROJECT FINANCING

Coastal Conservancy	\$199,385
County of Marin	\$35,242
Marin County Resource Conservation District	\$19,331
Project Total	\$253,958

The anticipated source of funding for this project is the fiscal year 2017 appropriation 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” (Section 79731). Section 79732(a) states more specifically that these funds may be used to “protect and restore aquatic, wetland, and migratory bird ecosystems including fish and wildlife corridors” and to “assist in the recovery of endangered, threatened, or migratory species by improving watershed health [and] fish passage....” Consistent with these provisions, the project will enhance and restore aquatic ecosystems providing habitat for threatened species of anadromous fish.

As required by Proposition 1, the proposed project provides multiple benefits. By restoring winter refuge and summer rearing habitat in San Geronimo Creek, the project will benefit depleted native fish populations and other aquatic species that utilize the creek. This project will also reduce erosion through bioengineered bank stabilization and by protecting against further channel incision, thus improving water quality. None of the required work will be for environmental mitigation measures or compliance obligations otherwise required by law. (Section 79731(b)).

In accordance with Section 79707(b), which requires agencies to prioritize “projects that leverage private, federal, or local funding or produce the greatest public benefit”, this project leverages local in-kind contributions as discussed below.

The project was reviewed and subsequently recommended for funding 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 detail in this section, the “Project Summary” section and in the “Consistency with Conservancy’s Project Selection Criteria & Guidelines” section of this recommendation.

The County of Marin is contributing \$35,242 to pay for MRCD staff time. The MRCD will provide significant in-kind contributions, valued at over \$11,875. These contributions consist of 10 large logs for in-stream structures, riparian plantings, and MRCD Board of Directors’ time.

In addition, the project leverages a CDFW Fisheries Restoration Grant Program grant of \$47,307 that paid for previous design work.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The proposed project will be undertaken pursuant to the Conservancy’s enabling legislation, Division 21 of the Public Resources Code (PRC); in particular Chapter 5.5 (PRC Section 31220), regarding integrated coastal and marine resources protection.

Consistent with Section 31220(a), Conservancy staff has consulted with the State Water Quality Control Board in developing this project (Exhibit 5). Section 31220(a) authorizes the Conservancy to undertake and award grants for projects that meet one or more criteria of Section 31220(b). Consistent with 31220(b), the project will achieve the following objectives: 1) protect or restore fish and wildlife habitat within coastal and marine waters and a coastal watershed by reducing an impediment to fish passage; 2) reduce threats to coastal and marine fish and wildlife; and 3) reduce unnatural erosion and sedimentation of a coastal watershed through stream bank stabilization.

As Section 31220(c) requires, the proposed project is consistent with local and state watershed plans, as discussed below under “Consistency with Local Watershed Management Plan/State Water Quality Control Plan.”

Section 31220(c) requires that the project include a monitoring and evaluation component. Extensive monitoring and evaluation are integrated into the design of the project.

**CONSISTENCY WITH CONSERVANCY’S 2018 STRATEGIC PLAN
GOAL(S) & OBJECTIVE(S):**

Consistent with **Goal 6, Objective E** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will improve fish habitat by providing instream habitat and favorable 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 and enhancing wetlands providing fish and wildlife habitat, the proposed project serves to promote and implement several state plans, including:

- Priority Action 4 identified in the 2014 *California Water Action Plan*, prepared by CalEPA, the California Natural Resources Agency, and the California Department of Food and Agriculture), which provides: “Protect and Restore Important Ecosystems”. The Project will implement this action by restoring instream habitat in a creek that supports important and threatened fish populations.
- A Management Measure identified in the *California Nonpoint Source Pollution Control Program* prepared by the State Water Resources Control Board in 2000: MM6B- Restoration of Wetlands and Riparian Areas, which provides for the recovery of a range of wetland and riparian functions that existed previously by reestablishing hydrology, vegetation, and structure characteristics.
- *California Wildlife Action Plan*, prepared by the California Department of Fish and Wildlife (CDFW) in 2015. The project will help implement the following conservation strategy identified by the Wildlife Plan for anadromous salmonids statewide:
 - Enhance and protect key spawning and rearing habitat for each specific anadromous species (pg. 6-19)

The project would further this strategy by enhancing rearing habitat for coho salmon and steelhead in San Geronimo Creek.

- The following tasks identified in the *Recovery Strategy for California Coho Salmon*, prepared by CDFW in 2004:
 - Lagunitas Creek Task BM-LA-12: Work with private landowners to encourage biotechnical bank stabilization, riparian protections, woody debris retention, and timing of water withdrawals to help protect coho salmon.
 - Rangewide- Task XIII-C-02: Where appropriate and feasible, work with all parties, including landowners, to reconfigure levees and channelized streams to benefit coho salmon.
 - Rangewide- Task XV-B-01: Maintain or re-establish geographic distribution of coho salmon by continuing to allocate substantial improvement efforts towards identified key refugia with substantial coho salmon populations and/or otherwise suitable conditions.
 - Rangewide- Task XXII-A-04 Encourage restoration of LWD and shade by improvement of existing riparian zones through planting, release of conifers or

other appropriate native species, and control of blackberries and other competitors.

4. **Support of the public:** The project enjoys broad public support. Supporters include Senator McGuire, Supervisor Rodoni, and Assemblymember Levine. Support letters are included in Exhibit 4.
5. **Location:** The San Geronimo Creek Watershed is located outside the coastal zone, but it provides critical habitat to maintain and restore salmon and steelhead populations.
6. **Need:** The project would not occur without funding for implementation from the Conservancy.
7. **Greater-than-local interest:** Lagunitas Creek, to which San Geronimo Creek is a tributary, is identified as a focus population in NMFS 2012 Central California Coho Salmon Recovery Plan and as a Rank 5 (highest priority) recovery site in the 2004 Recovery Strategy for California Coho Salmon. Lagunitas Creek is also identified as an important watershed for steelhead in DFG's 1996 "Steelhead Restoration and Management Plan for California." Consistency of the project with these plans is described in the "Project Summary" section above.
8. **Sea level rise vulnerability:** The lowest elevations in the project area are approximately 200 feet above sea level, and are therefore not directly vulnerable to sea level rise under current projections.

Additional Criteria

9. **Urgency:** Coho salmon are currently at 6 to 15% of their abundance during the 1940s. Given this decline, and in light of the State's primary objective of returning coho salmon to a level of sustained viability, while protecting their genetic integrity, enhancement projects with a high potential for recovering local populations of coho salmon are a high priority for the State. The urgent need for this project in particular is underscored by the fact that this project is one of the first to be implemented from the San Geronimo Valley Landowner Assistance Program. A number of San Geronimo Valley landowners are interested in implementing restoration and enhancement projects on their properties. If this project is not implemented in an expeditious manner, the enthusiastic and voluntary participation of other landowners is likely to be significantly reduced.
10. **Resolution of more than one issue:** In addition to planning for the enhancement of riparian habitat for salmon, steelhead, and other native species, the project will also prevent loss of property due to bank erosion.
11. **Leverage:** See the "Project Financing" section above.
12. **Conflict Resolution:** Marin County's Stream Conservation Area Ordinance, which was enacted in 2013, has resulted in conflict between private landowners, the County, and environmental groups. The project would further the resolution of this conflict by facilitating voluntary habitat enhancement efforts by landowners.

13. **Innovation:** The project is innovative in working with small private landowners to implement an in-channel coho habitat enhancement project. Successful implementation will facilitate future restoration projects with other private landowners in this key watershed.
14. **Readiness:** The MRCD and its partners are ready to proceed with project implementation as soon as funding is available.
15. **Realization of prior Conservancy goals:** See “Project History” above.
16. **Return to Conservancy:** See the “Project Financing” section above.
17. **Cooperation:** Project partners include private landowners, MRCD, Marin County, and CDFW.
18. **Vulnerability from climate change impacts other than sea level rise:** The project will help improve the resiliency of San Geronimo Creek and coho in the watershed to increased storm events by increasing bank stability and winter refugia.
19. **Minimization of greenhouse gas emissions:** The project was designed to include measures to avoid or minimize greenhouse gas emissions to the extent feasible and consistent with the project objectives, such as by requiring construction equipment to be tuned and maintained to minimize emissions.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

While the project is located outside the coastal zone, it will result in enhancement of the wildlife habitat values of a portion of the Lagunitas Creek watershed. The proposed project is therefore consistent with the Coastal Act, section 30231 which states “(t)he biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained, and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of groundwater supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.” (Pub. Res. Code § 30231). The project will enhance the aquatic and riparian habitat of San Geronimo creek for the benefit of federally listed salmonids. The proposed project is therefore consistent with this section.

Units I and II of the Marin County LCP identify Marin’s numerous coastal streams and creeks as sensitive habitats for many species of birds and fish. Lagunitas Creek, of which San Geronimo is a tributary, contains runs of coho and steelhead specifically highlighted. (See LCP, Unit II at pg. 65).

Protection of riparian habitats is identified as a key concern for protecting the aquatic resources of the Lagunitas Creek watershed, and the Tomales Bay ecosystem into which Lagunitas flows. (LCP Unit II at pp. 66-68). Because the project will enhance and restore salmonid habitat in a

portion of the Lagunitas Creek watershed, the proposed project is entirely consistent with the LCP policies.

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

The project is consistent with, and furthers the goals of, the Tomales Bay Watershed Stewardship Plan (“TBWSP”), prepared by the Tomales Bay Watershed Council in July 2003. The project is consistent with Goal A of the TBWSP, as implementation would improve water quality in Tomales Bay by reducing sediment influx from bank erosion and channel incision. (TBWSP at p. 54). The project is also consistent with Goal B of the TBWSP, as implementation would improve the integrity of natural habitats and native communities. (ibid.).

The project is also consistent with the Tomales Bay Integrated Coastal Watershed Management Plan (“ICWMP”), completed in September 2007. The ICWMP is a cooperative effort by the Tomales Bay Watershed Council, Bolinas Community Public Utilities District, Inverness Public Utility District, Marin Municipal Water District, and North Marin Water District to identify management strategies and regional and projects that meet multiple objectives for the Tomales Bay region. The project is consistent with ICWMP Objective 1, as implementation would improve water quality in Tomales Bay by reducing sediment influx. (ICWMP at p. 3-9). The project is consistent with ICWMP Objective 5, as implementation would improve streams and riparian areas for native species. (ICWMP at p. 3-10). The project is consistent with ICWMP Objective 6, as implementation would improve potential habitats of special status species. (ibid.).

The project is also consistent with the Water Quality Control Plan for the San Francisco Bay Basin (adopted by the Regional Water Quality Control Board Central Coast Region in 1995 and reviewed every three years) in that it constitutes an important step towards the enhancement of fish and wildlife habitat in coastal watersheds and wetlands, including potential habitat for federally-listed steelhead and coho salmon, and will thereby protect and improve the following beneficial uses:

- Cold Freshwater Habitat
- Wildlife Habitat

The proposed project would also be an important step towards achieving the water quality objectives identified in the Water Quality Control Plan for suspended sediment loads and discharge rates by reducing inputs of fine sediment to San Geronimo Creek and thence to Lagunitas Creek and Tomales Bay.

COMPLIANCE WITH CEQA: The proposed project is part of the MRCD’s Marin Coastal Watersheds Permit Coordination Program, which seeks to provide cumulative and streamlined environmental review for identified fish habitat enhancement projects within Marin County. The program developed 17 defined enhancement practices for Marin and Southern Sonoma counties, including fish habitat enhancement practices. Each practice has been developed and field-tested over the past 75 years by U.S. Department of Agriculture Natural Resources Conservation Service specialists to arrive at the current national standards and specifications for

these practices. Modifications specific to California conditions were made for some practices. The *Initial Study and Mitigated Negative Declaration for the Marin Coastal Watersheds Permit Coordination Program* (MND), adopted by the MRCD on November 10, 2010, identified potential impacts to biological resources, geology and soils, hazards and hazardous materials, and hydrology and water quality from the use of the enhancement practices, and identified mitigation measures that will reduce the impacts to a less than significant level. These mitigation measures were incorporated into the design of the enhancement practices. In addition, the MRCD prepares a Mitigation Monitoring and Reporting Plan (MMP) for each project within the program to insure these mitigation measures are carried out (Exhibit 2) and completes an initial checklist for each individual project to ensure that there are no previously unidentified impacts requiring further environmental analysis for the project site.

The proposed coho salmon habitat restoration project falls under the Permit Coordination Program because it consists of stream habitat improvement, which is one of the enhancement practices that have been approved under the Permit Coordination Program and which are the subject of the MND (See Exhibit 2, Site Checklist). The project meets the definition of stream habitat improvement in the MND because it will provide instream habitat elements such as large wood and pool and riffle structure. MRCD has analyzed the project to determine whether it falls under the Permit Coordination Program and whether additional mitigation measures are required to address the project's potential impacts. The MRCD's analysis is documented in the initial checklist (Exhibit 2). Apart from the checklist, no additional CEQA analysis or documentation is required to implement this project.

Staff has reviewed the MND prepared by MRCD, and the associated public comment, the MMP for this project, and the individualized initial checklist for this project. The MND discusses potential environmental impacts of the project activities. Key areas considered include impacts to biological resources, geology/soils and hydrology/water quality. In all circumstances, potential impacts identified were minor and temporary, and mitigation measures were designed to ensure that potential disturbances will result in less than significant impacts and will provide for improved aquatic, riparian and/or upland habitat and decreased sedimentation in water bodies that benefit wildlife.

Potential impacts to biological resources from the project were identified. However, the project will not have a substantial adverse effect because project implementation avoids short-term adverse impacts through mitigation measures. These mitigation measures include constraining the permissible work window to avoid nesting or breeding seasons of birds and terrestrial animals, minimizing site access points, and taking other precautionary measures to avoid the spreading of invasive species, trash, or hazardous materials such as equipment lubricants. To minimize impacts to coho salmon, steelhead trout, and other fish species, construction will occur during between June 15 and October 15 when salmonids are not spawning, the work area will be dewatered, and the creek will be diverted temporarily around the work area during construction in a manner that will not trap or isolate fish. Long-term, the project will restore stream habitat and provide a long-term benefit to both anadromous salmonids and other fish and wildlife. MRCD will get approval from the DFG and USFWS prior to project implementation to assure that project impacts have been eliminated or minimized. If deemed necessary by DFG and/or USFWS, a qualified biologist will be onsite during construction.

Concerning soil erosion, Best Management Practices (BMPs) will be utilized during construction to prevent soil loss and polluted runoff. Related to hydrology/water quality, BMPs will also be used, as well as mitigation measures incorporated as conditions of the Fish and Game Code §1600, *et seq.*, Streambed Alteration MOA which are part of the MND. Waste Discharge Requirements from the North Coast and San Francisco Bay Regional Water Quality Control Boards are also incorporated into the project design.

Two comments were received on the proposed MND during the public comment review period, one from the California Department of Fish and Game (DFG) and one from Caltrans. These letters are included in Exhibit 2. These comment letters advised the MRCD that projects implemented under the PCP could require permits from DFG and Caltrans. DFG further stated that the work would have to be conducted in a manner that would allow MRCD to be the permit holder, and that the MND did not necessarily provide adequate information to meet permit requirements under the California Endangered Species Act. The MRCD determined that it did not need to revise the MND in response to these comments. The MRCD works with DFG and Caltrans to permit each individual project under the MND as necessary and provides whatever information is required.

On November 10, 2010, as the lead agency under CEQA, the MRCD adopted the MND for its Marin Coastal Watersheds Permit Coordination Program and approved the Program (Exhibit 2, MND). On December 4, 2017, MRCD conducted a site assessment and initial checklist to determine if any conditions warrant additional modification of the project practices for fish enhancement. No additional modification were needed. (See Exhibit 2).

Staff has independently evaluated the MND, MMP and the individualized checklist, and concurs that there is no substantial evidence that the proposed project will have a significant effect on the environment. Staff therefore recommends that the Conservancy, as a responsible agency, find that the project, as mitigated, avoids, reduces or mitigates the possible significant environmental effects to a level of insignificance, and that there is no substantial evidence that the project will have a significant effect on the environment as that term is defined by 14 Cal, Code Regs §15382.¹

Upon approval, staff will file a Notice of Determination for this project.

¹ Significant effect on the environment" is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. 14 CCR § 15382.