

COASTAL CONSERVANCY

Staff Recommendation

January 18, 2018

SAN GERONIMO VALLEY GOLF COURSE CONCEPTUAL RESTORATION AND REUSE PLAN

Project No. 17-040-01

Project Manager: Joel Gerwein

RECOMMENDED ACTION: Authorization to disburse up to \$150,000 to the County of Marin to prepare a conceptual restoration and reuse plan for the 157-acre San Geronimo Valley Golf Course in Marin County.

LOCATION: San Geronimo Valley, Marin County

PROGRAM CATEGORY: San Francisco Bay Area Conservancy Program, Integrated Coastal and Marine Resources Protection

EXHIBITS

Exhibit 1: [Project Location](#)

Exhibit 2: [Site Photographs](#)

Exhibit 3: [Project Letters](#)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31160-31165 and 31220 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of up to \$150,000 (one hundred fifty thousand dollars) to the County of Marin (“the County”) to prepare a conceptual restoration and reuse plan for the 157-acre San Geronimo Valley Golf Course property, Marin County (“the property”). This authorization is subject to the following conditions:

1. Prior to the disbursement of funds, the County shall submit for the review and approval of the Executive Officer:
 - a. A work plan, schedule and budget, and the names and qualifications of any contractor(s) to be used in the development of the plan.
 - b. Documentation that the Trust for Public Land (TPL) and the County have entered into an agreement that allows the County to access the property as needed to prepare the restoration and re-use plan and that provides for the sale of the property by TPL to the County.

2. The conceptual restoration and reuse plan shall include descriptions of natural communities and resources on the property, an explanation of how indicators of ecosystem health will be monitored and evaluated, a public access component, and a concept-level assessment and recommendation for restoration of the property for the benefit of riparian and other resources and reuse of the property.”

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 the purposes and objectives of Chapters 4.5 and 5.5 of Division 21 of the Public Resources Code, regarding the San Francisco Bay Area Conservancy Program and Integrated Coastal and Marine Resources Protection, respectively.
 2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.”
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PROJECT SUMMARY:

The proposed authorization would provide up to \$150,000 to the County of Marin (“the County”) to prepare a conceptual restoration and reuse plan for the 157-acre San Geronimo Valley Golf Course (Exhibits 1 and 2).

The County intends to acquire the golf course from the Trust for Public Land (TPL) in 2018. The acquisition of the golf course would primarily serve to assist in the preservation and protection of riparian resources and in the recovery of listed salmonids. It would also allow for access to and connectivity between regional preserves and San Geronimo Valley communities, protect a community asset, and provide new opportunities for habitat restoration, passive recreation, and other community spaces, such as a community garden or gathering space. The County will prioritize restoration and enhancement of fish and wildlife habitat, provision of public access, and protection of open space for three of the four golf course parcels, comprising 135 of 157 total acres. The fourth parcel, which contains the existing clubhouse and parking lot, may also support additional built infrastructure such as a playground, fire station, or wastewater treatment plant, as discussed further below. The planning process will allow the public to provide input on these and other potential uses, and allow the County to select a preferred alternative for the site, resolving conflicts between proposed uses.

The property is located in the Lagunitas Creek watershed, which supports an important population of federally endangered Central California Coast (CCC) coho salmon and threatened CCC steelhead trout. The Lagunitas Creek watershed coho salmon population is the largest and most stable population south of Fort Bragg, with approximately 5,000 adult fish returning to spawn each year. Approximately 40% of this population spawns in San Geronimo Valley, of which 40% spawn in that stretch of San Geronimo and Larsen Creeks within the Golf Course property. However, these salmonid populations are stressed by land uses in the San Geronimo Valley that impair the quantity and quality of in-stream flow. The project presents an opportunity to significantly increase stream flows and plan for comprehensive restoration of the property to enhance habitat for salmonids. The golf course is one of the ten largest water users in the

County. Restoration could significantly increase the amount of riparian habitat, reconnect San Geronimo and Larsen Creek to their floodplains, and provide more off-channel habitat for salmonids and other fish and wildlife. The property is adjacent to three other open space preserves. Its protection will create 864 acres of contiguous protected open space.

As a secondary benefit, management of the property as part of the regional trail network will improve access to and connectivity between regional preserves and San Geronimo Valley communities. The communities of Woodacre, San Geronimo, Forest Knolls and Lagunitas dot the Valley floor. Sir Francis Drake Blvd (SFD) is the primary means of vehicular transportation between these communities, cutting through the heart of the Valley and providing few opportunities for bicyclists and pedestrians to safely navigate or cross. Significant swaths of protected public lands, all managed by Marin County Parks (MCP), are located on either side of SFD. The golf course straddles SFD and contains cart paths that include a bridge over Nicasio Valley Road and a tunnel under SFD. The County is considering repurposing the golf course's existing network of cart paths into an off-street, non-motorized multi-use trail network and provide safe, alternative transportation routes between communities, schools, and protected open space. The existing parking lot could be opened to visitors to both the new park and surrounding open spaces, such as the French Ranch Open Space Preserve, Roy's Redwood Preserve, and the Maurice Thorner Memorial Preserve. The property could become a new public park, improve circulation in San Geronimo Valley, and improve access to the neighboring preserves.

Marin County Parks has been managing the property since TPL acquired the property on January 4, 2018. The County will issue a formal request for proposals from interim operators who could continue managing the property as a golf course until late 2019. While the golf course is not an economically viable operation, there is a vocal community of golfers who would enjoy this continued use. Finding an interim operator would allow the continued popular use of the golf course while the restoration and reuse plan is being developed. By late 2019, the County intends to wind down maintenance and use of the property as a golf course and manage the property consistent with the recommendations of the restoration and reuse plan, which the County will develop with extensive public outreach and input. If no interim golf operator is found, the County will manage the property on an interim basis as a greenbelt utilizing the cart paths as a network of multi-use trails. Also during this interim period, Marin County Parks would manage weeds and selectively mow the grass to maintain safe recreational use and manage fire risk. If the property is acquired by the County as planned and is no longer being used as a golf course during the interim period, the County expects to dedicate approximately 20 acre feet of water currently used for golf course irrigation to instream flow for the benefit of salmonids and other aquatic species.

The restoration and reuse planning process will include a six to nine-month community engagement process. This process will result in a conceptual restoration and reuse plan. The community engagement process will involve a series of outreach events to allow both the surrounding community and the county at-large to participate in establishing a high-level vision for the future use of the property that includes restoration and protection of the salmonid population. During the outreach process, the public will be able to provide input about future uses of facilities such as the clubhouse, the community garden, and other existing and proposed new amenities.

The property is a community open space asset. Planning for the acquisition, restoration, and reuse of the site by the County will facilitate its protection, preventing private development from closing the site to the public. The property is zoned for commercial recreation and permitted uses could include a variety of tourism-oriented improvements including: spas, lodges, bars, accessory retail uses, restaurants, bed and breakfast inns, hotels, motels and service stations. The restoration and reuse plan presents an opportunity to plan for the permanent protection and enhancement of the character of San Geronimo Valley.

Portions of the property could be reused to support additional public services and gathering places for the San Geronimo Valley communities and the general public. Specifically, the 22-acre parcel, which the County plans to purchase solely with County funds, is already partially developed with the clubhouse and parking area, and could serve a broad range of additional community needs. For example, the clubhouse could be adapted for community events, an existing community garden could be expanded, and new public-serving improvements could be sited on the property. The County does not plan to seek state conservation funding for the acquisition of this portion of the property. Therefore, though at this time there are no definitive plans, its future use will not necessarily be restricted solely to resource protection, public access, park, and habitat purposes.

The County has extensive experience planning for open space management and protection; Marin County Parks currently owns and manages 20,000 acres. The Conservancy has worked successfully with the County on other conservation planning projects, most notably salmonid habitat enhancement planning and fish passage improvement in the San Geronimo Valley and open space protection and habitat enhancement elsewhere in the County.

Site Description: The property is an 18-hole golf course that is 157-acres in extent. An approximately 0.5 mile reach of San Geronimo Creek runs through the southern parcel, and an approximately 0.4 mile reach of Larsen Creek runs through the northeastern parcel. An additional 1.4 miles of unnamed tributaries to San Geronimo and Larsen Creeks also traverse the property. The golf course includes four artificial ponds, constructed on an impermeable layer/liner which prevents contact with the ground water. The golf course ponds contain non-native fish and frog species that present a significant threat to the native salmonid and frog populations. Two ponds near the upper end of the golf course on Larsen Creek are directly connected to upstream and downstream reaches of the creek and negatively impact water quality and fish habitat in Larsen Creek in various ways. The ponds alter hydrology, raise water temperatures, and provide a vector for the constant reintroduction of non-native fish and bullfrogs that prey on salmonid fry.

Steelhead trout and coho salmon use portions of Larsen Creek and San Geronimo Creek crossing the golf course for spawning. Rearing is limited in Larsen Creek as the channel tends to dry up in mid-summer, but juvenile rearing in San Geronimo is common.

The property also contains a separate 22-acre parcel. This 22-acre parcel contains a 14,750 square foot two-story clubhouse, constructed circa 1967, with a parking lot. Additionally, there are various accessory structures on the remaining 135 acres that could be acquired with state and local conservation funds, including a maintenance building, a storage shed, a caretaker's cottage and an ADA accessible bathroom facility. The 157-acre golf course property is surrounded by open space, residential properties, and a water treatment plant adjacent to the eastern boundary. The elevation of the site is approximately 331 ft. above sea level with a gradual down-slope

towards the south. The site has level to rolling hills topography. With the exception of the area covered by the buildings and lakes and some narrow riparian areas, the remaining 90% of the property is covered with turf.

Project History: The County submitted a proposal to the Conservancy's Proposition 1 grant round in May 2017 for the proposed conceptual planning and for additional funding to acquire the property. The project was reviewed in the competitive grant round along with many other projects and ranked highly in the review process. Staff is recommending this project as it meets the priorities and criteria described in the Conservancy's Request for Proposals.

TPL purchased the golf course on January 4, 2018, with the intent of holding the property until the County could raise sufficient funds to reimburse TPL for the purchase price. The County Board of Supervisors voted unanimously on November 14, 2017 to enter into an agreement with TPL to purchase the property by December 31, 2018 for \$8,850,000, below the appraised fair market value of \$8,950,000. The appraisal was completed for TPL on November 1, 2017, and has been reviewed and approved by the County. It will also be reviewed by the Department of General Services. A Phase I Environmental report for the property was prepared in 2017, and found no evidence of contamination on the property.

The San Geronimo Advocates (SGA), an interested citizens' group, sued the County on December 5, 2017, asserting that the county's decision to purchase the golf course before doing an environmental analysis violates the California Environmental Quality Act (CEQA). The suit alleges that the County's use of CEQA exemptions for the acquisition was inappropriate. The County determined that the acquisition is exempt from CEQA analysis under the following sections of the CEQA Guidelines, 14 Cal. Code of Regulations: Section 15316, as an acquisition of land in order to establish a park where the land is in a natural condition and no management plan has yet been prepared; Section 15325, as a transfer of ownership of interests in land in order to preserve open space or plant or animal habitat; and Section 15301, as the operation, maintenance, leasing, or minor alteration of existing public or private structures, facilities, or topographical features.

The SGA alleges that these CEQA exemptions do not apply, and SGA seeks to suspend the County's acquisition of the property until the County complies with CEQA. Due to this controversy, staff is recommending that the Conservancy proceed with authorizing the planning portion of the County's grant application now, and expects to return to the Conservancy in the future for consideration of the acquisition funding.

The restoration and reuse planning process will facilitate the County's acquisition by providing a forum for public input on approaches to protection and restoration of riparian and other open space resources and on other compatible uses of the property, including public access and various alternatives for reuse of the 22-acre parcel and its existing facilities.

The Conservancy has worked with the County for many years to plan for and implement the enhancement of fish and wildlife habitat in the San Geronimo Valley. The preparation of the San Geronimo Valley Salmon Enhancement Plan was partially funded by a Conservancy grant of \$100,000 to the County in 2008. The Plan was followed by a Landowner Assistance Program that developed restoration and enhancement projects on private lands, which was partially funded by a Conservancy grant of \$98,335 to the County in 2010. The Conservancy also provided a \$450,000 grant to the County in 2011 for the acquisition of San Geronimo Ridge.

PROJECT FINANCING

Coastal Conservancy	\$150,000
County of Marin	\$150,000
Project Total	\$300,000

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)(4) 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 restoration and reuse plan will plan for the protection and restoration of San Geronimo and Larsen Creeks and their floodplains, aquatic ecosystems that provide habitat for threatened species of anadromous fish.

As required by Proposition 1, the proposed project provides multiple benefits. By planning for the protection and restoration of fish and wildlife habitat in San Geronimo and Larsen Creeks and their floodplains, the project will benefit depleted native fish populations and other aquatic species that utilize the creek. In addition, the project will plan for:

- Public access to and connectivity between regional preserves and San Geronimo Valley communities,
- Protection of a community asset, and
- New opportunities for habitat restoration, passive recreation, and other community spaces, such as a community garden or gathering space.

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 County 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 will contribute \$150,000 in cash toward the public outreach and conceptual restoration and reuse plan. In addition, the County will provide the in-kind contribution of staff time necessary to manage and implement this approximately nine months to one-year process.

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 4.5 (PRC Sections 31160-31165), regarding the San Francisco Bay Area Conservancy Program, and Chapter 5.5 (PRC Section 31220), regarding integrated coastal and marine resources protection.

Consistent with Section 31162(b), the project involves a grant to plan for the protection, restoration and reuse of watersheds and open-space resources of regional importance.

Consistent with Section 31162(a), the project involves a grant to plan for the improvement of public access to Bay Area ridgetops by planning for a local trail network connecting to population centers and public facilities that will be part of a regional trail system and is consistent with the County General Plan.

Consistent with Section 31163(c)(1), the project is supported by the County's Local Coastal Program and with the Tomales Bay Watershed Stewardship Plan, as discussed in "Consistency with Local Coastal Program Policies" and "Consistency with Local Watershed Management Plan" sections below.

Consistent with Section 31163(c)(2), the project will serve a regional constituency, as it will plan for the protection, restoration and reuse of open space and wildlife habitat of regional significance and furthering of public access in an area utilized by residents from around the San Francisco Bay Area.

Consistent with Section 31163(c)(3), the project can be implemented in a timely way, as discussed in the "Consistency with Conservancy's Project Selection Criteria and Guidelines" section under Criterion 12.

Consistent with Section 31163(c)(4), the project provides opportunities for benefits that could be lost if it is not quickly implemented, as discussed in the "Consistency with Conservancy's Project Selection Criteria and Guidelines" section under Criterion 9.

Consistent with Section 31163(c)(5), the project includes matching funds from the County, as discussed in the "Project Financing" section above.

Consistent with Section 31165, the project is compatible with the preservation of watershed resources.

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) plan for the protection of fish and wildlife habitat within a coastal watershed in and adjacent to Larsen and San Geronimo Creeks and their tributaries, and for the dedication of water to instream flow; 2) plan to reduce threats from private development to coastal and marine fish and wildlife; 3) plan to acquire and protect riparian areas, floodplains and other sensitive watershed lands; and 4) plan to provide for public access compatible with resource protection and restoration objectives.

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. While the future acquisition of the property would include a monitoring plan to document that the property is being used for the acquisition purposes, the current planning phase does not require a monitoring component. However, ongoing monitoring of San Geronimo Creek by the Marin Municipal Water District will continue. MMWD has been conducting rigorous and systematic fish monitoring along San Geronimo Creek through the golf course property since 1994. More detailed monitoring and evaluation plans will be developed as restoration projects for the property are developed and implemented. These plans will be tailored to the specific goals and designs of individual restoration projects.

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

Consistent with **Goal 6, Objective C** of the Conservancy's 2018-2022 Strategic Plan, the proposed project will develop a plan to enhance coastal watershed lands and improve fish passage.

Consistent with **Goal 13, Objective H** of the Conservancy's 2018-2022 Strategic Plan, the proposed project will develop a plan for regionally significant public access trails and community connectors.

**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 planning for the protection and restoration of creeks and floodplains 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 planning for the protection and restoration of creeks and floodplains that support important and threatened fish and wildlife populations.

- *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 planning for the protection and restoration of spawning and rearing habitat for coho salmon and steelhead trout in San Geronimo and Larsen Creeks.

- The following tasks identified in the *Recovery Strategy for California Coho Salmon*, prepared by CDFW in 2004:
 - Lagunitas Creek Task BM-LA-05: Commit ongoing resources and support of stewardship in the basin to include riparian enhancement and protection, ...water conservation, outreach and education, ...and planning and assessment of potential restoration projects to benefit coho salmon.
 - Lagunitas Creek Task BM-LA-12: In the San Geronimo Creek sub-watershed, continue public outreach and education for private landowners, residents, commercial, public utility and county workers regarding best management practices to control erosion, protect riparian vegetation, retain LWD, and minimize disturbance to coho salmon from pets.
 - Rangewide Task RW-II-B-01 Pursue opportunities to acquire or lease water, or acquire water rights from willing sellers for coho salmon recovery purposes. Develop incentives for water right holders to dedicate instream flows for the protection of coho salmon (Water Code §1707).
 - Rangewide Task RW-XXV-C-01 Acquire conservation easements or land in fee title from willing landowners to protect coho salmon habitat.
- 4. **Support of the public:** While the SGA has challenged the acquisition and there is some public opposition, the project enjoys broad public support, including from State Assemblymember Levine, State Senator McGuire, County Supervisor Dennis Rodoni, California State Parks, Marin Audubon Society, Marin Municipal Water District, the San Geronimo Planning Group, Trout Unlimited, the U.S. Fish and Wildlife Service, the Sierra Club San Francisco Bay Chapter, and the Salmon Protection and Watershed Network (Exhibit 3).
- 5. **Location:** The San Geronimo Valley Golf Course is located in Marin County outside the coastal zone, but it provides critical habitat to maintain and restore coastal salmon and steelhead populations.
- 6. **Need:** Conservancy funding is needed to make restoration and reuse planning for the golf course possible.
- 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."

8. **Sea level rise vulnerability:** The property is approximately 330 ft. above sea level, and is therefore not directly vulnerable to sea level rise under current projections.

Additional Criteria

9. **Urgency:** The planning process must get underway immediately in order to inform the acquisition of the property. The acquisition must be secured by late 2018 to allow the County to take advantage of the opportunity to acquire it from TPL.
10. **Resolution of more than one issue:** Restoration and reuse of the property will facilitate restoration of critical fish and wildlife habitat, and will also provide valuable public access to open space. In addition, the planning effort will provide a public forum to resolve conflicts over the potential uses of the property, as discussed in the Project History section above.
11. **Leverage:** See the "Project Financing" section above.
12. **Readiness:** The County is prepared to begin the planning process as soon as funds are available. In addition, the County and TPL are taking the necessary steps to complete the acquisition in 2018. An appraisal has been completed and reviewed by the County. A Phase I Environmental Report and a title report have been prepared and reviewed by the County.
13. **Realization of prior Conservancy goals:** "See "Project History" above."
14. **Return to Conservancy:** See the "Project Financing" section above.
15. **Cooperation:** The planning process for the property will involve residents of the area and of the entire County, as well as community organizations, public agencies and non-profits.
16. **Vulnerability from climate change impacts other than sea level rise:** The restoration and reuse plan will take into account protection from floods and wildfires, disturbances that are projected to increase in frequency and severity with climate change.
17. **Minimization of greenhouse gas emissions:** The planning process will consider the use of the cart paths on the property as multi-use trails, improving pedestrian and bicycle safety for Valley residents and visitors and likely reducing the number of car trips. The paths and tunnel under Sir Frances Drake Boulevard could also be used as safe routes to schools.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

While the project is located outside the coastal zone, it will result in enhancement planning for the wildlife habitat values of a portion of the Lagunitas Creek watershed and for protection of a coastal resource, the native salmonid populations using that habitat.

The proposed project is consistent with the Coastal Act, which provides the framework for the local coastal policies. Public Resources Code Section 30231 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.” The project will plan for the protection and restoration of the aquatic and riparian habitat of San Geronimo and Larsen Creeks for the benefit of federally listed salmonids.

The project is also consistent with the policies of the Marin County Local Coastal Program (LCP) that reflect the overarching state policy. 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 and Larsen Creeks are tributaries, contains runs of coho salmon and steelhead that are specifically highlighted. (See LCP, Unit II at pg. 65). Protection of riparian habitats is also 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 plan for the enhancement of salmonid habitat in a portion of the Lagunitas Creek watershed, it carries out that policy.

**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 B, Objective 3 of the TBWSP, which is to “Restore and protect habitats of native species in the Tomales Bay watershed.” (TBWSP at pg. 54) The project will further this objective by planning for the protection and restoration of fish and wildlife habitat in San Geronimo and Larsen Creeks and on the golf course (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 5, as it involves planning for the improvement of streams and riparian areas for native species. (ICWMP at p. 3-10). The project is consistent with ICWMP Objective 6, as it involves planning for the improvement of 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 protection and enhancement of fish and wildlife habitat in coastal watersheds and wetlands, including potential habitat for federally-listed steelhead and coho salmon, and will thereby planning for the protection and restoration of the following beneficial uses:

- Cold Freshwater Habitat
- Wildlife Habitat

COMPLIANCE WITH CEQA:

Preparation of the conceptual restoration and reuse plan is statutorily exempt under CEQA Guidelines (14 Cal. Code Regs. §§ 15000 *et seq.*) Section 15262 as it involves planning and feasibility studies for possible future restoration activities, development and uses of the property that have not yet been approved, adopted or funded. Preparation of the plan is also categorically exempt from CEQA pursuant to Section 15306, which exempts basic data collection and resource evaluation activities that will not result in serious or major disturbance to environmental resources. The preparation of the conceptual restoration and reuse plan entails data collection, resource evaluation activities, and preparation of feasibility and planning documents. These activities will inform future restoration activities, development and uses of the property that have not yet been approved or funded. The proposed project will not have an impact on environmental resources, and environmental factors will be considered during implementation of the project. Accordingly, the planning project is exempt from CEQA.

Staff will file a notice of exemption upon Conservancy approval.