

COASTAL CONSERVANCY

Staff Recommendation
May 16, 2019

ELLWOOD MONARCH BUTTERFLY HABITAT ENHANCEMENT PROJECT

Project No. 19-006-01
Project Manager: Rachel Couch

RECOMMENDED ACTION: Authorization to disburse up to \$3.9 million to the City of Goleta for enhancement of monarch butterfly and other wildlife habitat at Ellwood Mesa, Santa Barbara County, and adoption of CEQA findings under the California Environmental Quality Act.

LOCATION: Goleta, California

PROGRAM CATEGORY: Resource Enhancement

EXHIBITS

- Exhibit 1: [Project Location Map](#)
 - Exhibit 2: [Figures and Photos](#)
 - Exhibit 3: [Project Letters](#)
 - Exhibit 4: [Initial Study/Mitigated Negative Declaration](#)
 - Exhibit 5: [Mitigation, Monitoring and Reporting Program](#)
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RESOLUTION AND FINDINGS:

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

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed three million nine hundred thousand dollars (\$3,900,000) to the City of Goleta (“the grantee”) to implement the Monarch Butterfly Habitat Management Plan at Ellwood Mesa, as shown on Exhibit 1 to the accompanying staff recommendation. This authorization is subject to the following conditions:

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (“Executive Officer”) the following:

1. A detailed work program, schedule, budget, and list of contractors to be retained for the project.

2. Evidence that all necessary permits and approvals required to implement the project have been obtained.
3. A signing plan for the project acknowledging Conservancy funding.”

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 enhancement of coastal resources.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
4. The Conservancy has independently reviewed and considered the *Ellwood Mesa/Sperling Preserve Monarch Butterfly Habitat Management Plan Initial Study – Mitigated Negative Declaration* adopted by the City of Goleta on March 19, 2019 pursuant to the California Environmental Quality Act (“CEQA”) and attached to the accompanying staff recommendation as Exhibit 4. The Conservancy finds that the proposed project as designed and mitigated avoids, reduces, or mitigates the potentially significant environmental effects to a less-than-significant level, and that there is no substantial evidence based on the record as a whole that the Project may have a significant effect on the environment, as defined in 14 Cal. Code Regulations Section 15382.”

PROJECT SUMMARY:

Staff recommends the Conservancy provide a grant of up to \$3.9 million to the City of Goleta for enhancement of monarch butterfly and other wildlife habitat at the Ellwood Mesa/Sperling Preserve Open Space (“Ellwood Mesa Open Space”), a 137-acre open space area owned by the City of Goleta (City) on the eastern edge of the Gaviota Coast. The project specifically addresses a 75-acre subarea of the Ellwood Mesa Open Space that supports habitat for monarch butterflies; this subarea is referred to as the Coverage Area (Exhibit 2). The project consists of implementing the Monarch Butterfly Habitat Management Plan (“MBHMP”), which identifies how the City will preserve, restore, and enhance monarch butterfly overwintering habitat, and includes enhancement of other wildlife habitat, education and outreach, trail improvements, signage, monitoring, and research.

Ellwood Mesa is one of the most important sites for overwintering monarch butterflies in California; in fact, a portion of the site is designated by The Xerces Society¹ as “the premier Monarch site in southern California.” The butterflies arrive at Ellwood Mesa in mid-September

¹ The Xerces Society for Invertebrate Conservation is a non-profit organization, established in 1971, that protects wildlife through the conservation of invertebrates and their habitat.

and, as winter approaches, cluster into aggregation roosts, often called overwintering or wintering colonies. The project is needed because the monarch population is experiencing a sudden and significant decline in Western North America. Monarch overwintering populations throughout California have been in steep decline for the past several years, which has coincided with an extended and severe drought period. Early results of 2018-2019 surveys indicate that the statewide population has declined 86% in the last year. The current population is less than 0.5% of its historic size. The U.S. Fish and Wildlife Service is currently evaluating whether the species warrants listing under the Endangered Species Act.

In 2017, the City of Goleta assessed the health of the Ellwood Mesa eucalyptus grove. The results showed that more than 1,000 eucalyptus trees used by the local monarch population (over 20% of the population of the grove) were dead or dying due to the severe drought and subsequent vulnerability to pests. The city's assessment of the eucalyptus grove led to the preparation of the Ellwood Mesa Monarch Butterfly Habitat Management Plan ("MBHMP"). The plan and the associated MND were adopted on March 19, 2019.

Substantial work is needed to preserve existing butterfly habitat and to enhance degraded habitat quality throughout the Coverage Area overall and at several monarch aggregation sites in particular. Monarchs require specific conditions at sites used for overwintering, including protection from wind, extreme temperatures, and pests. Degradation of aggregation habitat has decreased protection of overwintering butterflies from the elements, and it has likely resulted in earlier dispersal and increased mortality of the local population. Given the current conditions described above and the importance of the Ellwood site to the overall monarch butterfly population in the state, timely action is needed to enhance the degraded monarch habitat.

The project will implement the MBHMP such that the ecosystem functions and values offered by a healthy forest on Ellwood Mesa are restored. In addition to supporting the monarch butterfly population, the proposed restoration would support many other vulnerable plant and animal species. Removal of hazards and planting restoration trees would be supplemented with native plantings in the riparian corridor of Devereux Creek and in the eucalyptus understory. Carefully planned supplemental planting of native trees will be evaluated regarding appropriate locations and density to sustain and improve habitat function for butterflies and to improve diversity and use of the habitat.

The MBHMP includes four categories of programs, explained in a clear and concise manner: Administrative; Natural Resource Management; Outreach; and Monitoring, Research and Adaptive Management. The plan is designed to organize and integrate the many diverse aspects of habitat management into an overall plan that can be readily implemented: Each specific program identifies individual goals, as well as policies and actions, to establish a well-organized and efficient process leading to a management strategy for the sustainability of monarch butterfly habitat at Ellwood Mesa open Space. Information obtained from these programs and other sources can be used to adapt the MBHMP in response to additional information or changing conditions. Key components of the MBHMP include:

- Expedite the completion of the MBHMP Implementation Plan and necessary permitting (e.g., Coastal Development Permit).

- Remove and replace dead trees to optimize butterfly habitat value and increase human safety along trails and at observation sites.
- Identify and reduce potential impacts to monarch butterfly habitat including pest infestations, trash and debris, and other threats that may arise over time.
- Support implementation of Goleta's Community Wildfire Protection Plan in the buffer zone between the open space and adjacent housing.
- Design, construct, and install an interpretive signage program that is sensitive to the environment.
- Improve and maintain public recreational features such as trails, trail markers, and benches.
- Expand the docent program.

Site Description: The project is located on 137 acres formally known as Ellwood Mesa/Sperling Preserve Open Space, which are owned by the City of Goleta in Santa Barbara County. Goleta is a suburban area that incorporated as a City in 2002. It is located approximately 10 miles west of Santa Barbara. Goleta and its surrounding area contain important natural resources, including outstanding beaches, the Gaviota Coast (considered a biodiversity hotspot), the Goleta and Devereux Sloughs, three State Marine Conservation Areas (Naples, Campus Point and Goleta Slough), and coastal bluff, foothill and creek habitats supporting numerous plant communities and wildlife species. The open space sits on coastal plain between the University of California, Santa Barbara (UCSB) to the east and Sandpiper Golf Course to the west, with the Pacific Ocean to the south and residential neighborhoods to the north.

The MBHMP Coverage Area encompasses approximately 75 acres of habitat supporting monarch butterfly aggregation roosting areas within the open space. In total, there are five sites within the Coverage Area where the monarch butterflies commonly aggregate, and a sixth is immediately adjacent on privately-owned land (See Exhibit 1, Figure 3). Exhibit 2 Figure 1 shows the vegetation communities and habitats in the Coverage Area. The Ellwood Mesa Open Space lies within the larger 651-acre Ellwood-Devereux Open Space complex. The complex includes lands owned by UCSB, the Land Trust for Santa Barbara County, and the City of Goleta, but it functions as one ecosystem.

The Coverage Area is on a coastal mesa, within which eucalyptus woodlands form dense canopies with adjacent native and non-native grasslands and coyote brush scrub habitats. In areas outside the eucalyptus groves, the Devereux Creek corridor supports native riparian and transitional vegetation. Two vernal pools are documented along the southern boundary of the Coverage Area. The Environmentally Sensitive Habitat Areas (ESHA) within the Coverage Area include Monarch butterfly aggregation sites, raptor roosting/nesting areas, riparian habitat, vernal pools, native grassland, sage scrub, and bluff scrub.

At least 83 bird species utilize habitat on Ellwood Mesa, and two identified special-status wildlife species, Cooper's hawk and nesting white-tailed kite, are present in the Coverage Area. The local Audubon Society chapter recognizes the Open Space as an important bird habitat with

red-tailed hawk, sharp-shinned hawk, red-shouldered hawk, and great-horned owls also using the area. One special status plant species, Santa Barbara honeysuckle, is also present.

The Coverage Area also includes a parking lot and numerous trails that are open to the public and used for visiting the monarch butterfly aggregation sites, walking and jogging on Ellwood Mesa, and accessing the beach to the south of Ellwood Mesa. An unpaved fire road along the northern edge of Devereux Creek in the Coverage Area can accommodate motorized vehicles but is only used by vehicles for emergency purposes. Under normal conditions, this road is used by the public as a walking route through the eucalyptus groves and functions as part of the trail system.

Monarch Butterfly Habitat

The monarch butterfly (*Danaus plexippus*) is a conspicuous black and orange butterfly that occurs in the United States, Mexico, northern South America, southwestern Europe, and Oceania. In the United States the species occurs as two populations, separated by the Rocky Mountains. Both of these populations are migratory, and most of the butterflies in the western population (which overlaps the Coverage Area) spend the summer months distributed across habitats between the Rocky Mountains and the Pacific coast, and they migrate to sheltered sites along the California coast to aggregate and pass the winter. Overwintering sites are predominately in dense eucalyptus groves, and breeding sites are variable but characterized by the presence of milkweed (*Asclepias* spp.), the larval host plant. The Ellwood Mesa complex of eucalyptus trees is the largest contiguous area of preserved monarch aggregation habitat in Southern California, and the aggregation sites in the Coverage Area provide significant habitat value to the monarch butterfly population. Monarchs typically arrive in the Coverage Area in early fall and depart late winter to early spring, depending on conditions. (Warmer temperatures lead to earlier departures). The monarch butterfly population in California has declined at least 74 percent since the 1990s (Pelton et al. 2016) and by over 95 percent since the 1980s, and the migratory population is at a high risk of extinction (The Xerces Society, 2017).

Grantee Qualifications: The City of Goleta owns the Ellwood Mesa Open Space/Sperling Preserve. The City has engaged in habitat restoration efforts and recreational stewardship of the area with the public over the past decade. The City has staff in multiple departments collaborating to implement the MBHMP, including staff specifically dedicated to open space management. Staff in these City departments have extensive project management experience. The City's Parks and Open Spaces Division ("Parks Division") is administered by the Public Works Department. The City has seven staff members in the Parks Division, in addition to the manager and director of the Public Works Department. The Parks Division is responsible for maintaining 15 City parks and 10 open spaces, totaling approximately 482 acres. The Division is also responsible for maintaining 31 landscaped street medians and over 6,500 trees within the City parks.

Project History: In 2005, the City of Goleta reached an agreement allowing development of a portion of the Ellwood Mesa away from the bluff area in exchange for the bluff top property. The City's acquisition of the bluff top property resulted in the creation of an open space area called the Sperling Preserve, known by locals as Ellwood Mesa. Concurrently, the Conservancy provided a \$4 million grant to the City to help acquire the remainder of the open space that now

comprises the Ellwood Mesa Open Space. Recognizing the need to better protect monarch habitat in the Coverage Area, the City began working on the MBHMP in 2010. In the fiscal year 2018-2019 State budget, funds were appropriated to the Conservancy specifically for conservation of monarch butterfly habitat at Ellwood Mesa. The City of Goleta contacted the Conservancy in late July 2018 to inquire about the project funding approval process. Conservancy staff has met with City staff several times over the past several months.

PROJECT FINANCING

Coastal Conservancy	\$3,900,000
City of Goleta	\$170,000
Project Total	\$4,070,000

The anticipated source of Conservancy funding for this project is a \$3.9 million appropriation from the General Fund specifically for local grants for the Ellwood Mesa Monarch Butterfly Grove in the City of Goleta.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The proposed project is undertaken pursuant to Sections 31220 of the Public Resources Code (Chapter 5.5 of Division 21), as described below.

Pursuant to Section 31220, the Conservancy may award grants to local jurisdictions for coastal protection and restoration projects. Consistent with the project selection criteria laid out in Chapter 5.5, section 31220(b), the project reduces the impact of population and economic pressures on coastal and marine resources (b)(7) and it provides for public access compatible with resource protection and restoration objectives (b)(8). Section 31220(c) requires that projects funded under Section 31220 be consistent with the Integrated Watershed Management Program established under Section 30947, local watershed management plans, if available, and water quality control plans adopted by the State Water Resources Control Board and regional water quality control boards; and include a monitoring and evaluation component. As discussed in detail below under “Consistency with Local Watershed Management Plan/State Water Quality Control Plan,” the proposed project is consistent with local and state watershed plans. In addition, the project includes a monitoring and evaluation component.

CONSISTENCY WITH CONSERVANCY’S 2018-2022 STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 6, Objective B** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project would enhance coastal habitats, including monarch overwintering aggregation sites and coastal stream corridors.

**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:** Implementation of the MBHMP will support two of the three overarching statewide goals of the California Wildlife Action Plan: 1) Abundance and Richness, Goal 1.3: sustain and enhance native species abundance and diversity; and 2) Enhance Ecosystem Conditions, Goal 2.2: Maintain and improve community structure and composition vital for sustaining ecosystems. The California Wildlife Action Plan also lists the monarch butterfly as an Invertebrate Species of Greatest Conservation Need.
4. **Support of the public:** The project is supported by U.S. Congressperson Salud Carbajal, State Senator Hannah-Beth Jackson, State Assemblymember Monique Limon, County Supervisor Joan Hartmann, and several local non-profit organizations including the Santa Barbara Audubon Society and Friends of the Ellwood Coast (Exhibit 3: Project Letters).
5. **Location:** "The proposed project would be located within the coastal zone of the City of Goleta."
6. **Need:** Without Conservancy funding implementation of the MBHMP would be delayed until other funding could be secured. The cost of work needed to restore aggregation sites far exceeds resources available to the City.
7. **Greater-than-local interest:** The Ellwood Mesa Monarch Butterfly Grove is one of the most important overwintering sites in California and is a priority for habitat enhancement to preserve the species, which is currently undergoing a precipitous drop in population. The Ellwood Mesa Open Space attracts visitors who come to the south coast of Santa Barbara County from other regions to enjoy the mild climate, accessible beaches, and many passive recreational amenities this area has to offer.
8. **Sea level rise vulnerability:** The vast majority of the 75-acre Coverage Area is located on the bluffs of Ellwood Mesa (elevation ranges from approximately 20 to 135 feet above mean sea level) and is therefore protected from sea level rise and storm surge. The lowest-lying portions of the Coverage Area are at least six feet above mean sea level, are located within Devereux Creek (which drains to Devereux Lagoon. As such, sea level rise and storm surge would have minimal impact on the implementation of the proposed project.

9. **Urgency:** The project addresses the current crisis impacting the monarch butterfly population by providing funds to enhance overwintering habitat.
10. **Readiness:** The City of Goleta is ready to begin work on the project immediately. The City expects to obtain permits by the end of 2019 and begin implementing restoration activities immediately afterwards.
11. **Realization of prior Conservancy goals:** For several decades, the Ellwood Mesa area was the focus of major battles between environmental groups who wanted to preserve the hundreds of acres of critical coastal habitat and developers who wanted to build on the prime bluff top property. In 2001, the Conservancy provided a \$110,000 grant to assist Santa Barbara County and UC Santa Barbara in developing a sweeping proposal for the area, which would reduce the amount of residential development, relocate development to inland locations and away from sensitive coastal resources, establish a 650-acre open space and natural reserve, provide for habitat improvements, and allow public access consistent with conservation and habitat management needs. In 2002, the newly created City of Goleta joined the process, and the parties collaborated to develop the *Ellwood-Devereux Coast Open Space & Habitat Management Plan*. The Conservancy also provided grant funds in 2012 to the Santa Barbara County Trails Council to plan trail improvements on Ellwood Mesa Open Space.
12. **Vulnerability from climate change impacts other than sea level rise:** The single greatest threat to the project is drought resulting from ongoing climate change and subsequent vulnerability to pests. This will be addressed through the implementation of the MBHMP and the associated Implementation Plans. It is anticipated that these plans will include the replacement of existing, water-demanding blue gum eucalyptus with drought-tolerant species and the use of supplemental water during drought conditions. The use of reclaimed water will be explored.

Minimization of greenhouse gas emissions: Habitat enhancement activities will temporarily generate greenhouse gas emissions (e.g., from light-duty vehicles and hand-held equipment such as chain saws) during restoration activities. Carbon sequestration is not a major goal of the project. However, newly planted trees will sequester carbon as they grow to maturity.

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

Projects undertaken pursuant to Chapter 5.5 of Public Resources Code Division 21 (Section 31220) must be consistent with local watershed management plans, if available, and with water quality control plans, adopted by the state and regional water boards. The proposed project is located along Devereux Creek, within the South Coast hydrologic unit within the Central Coast Basin. The proposed project is consistent with the Water Quality Control Plan for the Central Coastal Basin adopted by the Regional Water Quality Control Board because the project will facilitate the restoration of wildlife habitat in a coastal watershed thereby furthering the following beneficial use objectives: cold fresh water habitat, wildlife habitat; and rare, threatened or endangered species. There is no watershed management plan for the South Coast hydrologic

unit in general or Devereux Creek, specifically. The 2004 *Ellwood-Devereux Coast Open Space & Habitat Management Plan* identifies the Ellwood Butterfly Grove and Devereux Creek as significant habitat areas within the region.

COMPLIANCE WITH CEQA:

Staff has independently evaluated the *Initial Study/Mitigated Negative Declaration for the Ellwood Mesa/Sperling Preserve Monarch Butterfly Habitat Management Plan* (IS/MND; Exhibit 4) and Mitigation Monitoring and Reporting Program (MMRP; Exhibit 5) adopted by the City of Goleta on March 19, 2019, 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 find that the project as mitigated avoids, reduces or mitigates the possible significant environmental effects to a level of less-than-significant 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.

The IS/MND identifies mitigation measures to avoid, reduce or mitigate all of the possible significant environmental effects to less than significant. The project's potentially significant effects and mitigation measures are summarized below and are set forth in the attached IS/MND and Mitigation and Monitoring and Reporting Program.

Aesthetics

The proposed project could result in impacts to visual character or quality of public views of the site and its surroundings through the removal of dead, dying or diseased trees in compliance with the CWPP and the Tree Management Program. Consistent with Mitigation Measure BIO-7, actions to monitor and if necessary, replace habitat trees will be implemented to ensure the groves remain viable habitat for monarch butterflies and retain visual character.

Air Quality

Implementation of the MBHMP would not result in substantial long-term operational air quality emissions. However, smaller ground-disturbing activities would have the potential to temporarily and intermittently generate fugitive dust in the Coverage Area. 201D The Santa Barbara County Air Pollution Control District has a list of construction dust control measures (sweeping, watering, etc.) that will be implemented per Mitigation Measure AQ-1 for all construction phases to reduce these impacts to a less than significant level.

Biological Resources

Certain covered activities of the proposed project could result in direct and indirect impacts to federal and/or state listed plant and animal species and could conflict with policies regarding some of these species. Mitigation Measures BIO-1 through BIO-9 would reduce potential impacts to special status species to less than significant through actions including pre-activity surveys and nest and sensitive habitat avoidance, biological monitoring, worker education, tree replacement and compliance with applicable regulatory compliance and permit conditions. Implementation of pesticide restrictions in Mitigation Measure HQ-2 and integrated pest management to reduce pests that stress monarch butterflies, along with planting native species

and eradication of non-native species would enhance suitable habitat in the coverage area. The proposed project also has the potential to impact riparian, wetland, and other natural communities during habitat enhancement and tree and trail management activities including trimming, mowing and non-native invasive plant removal. According to the IS/MND, these impacts would be reduced to a less than significant level by implementing Mitigation Measure BIO-9, “which requires the City to avoid impacts to streams and wetlands where feasible, secure all applicable resource agency permits prior to conducting regulated activities in a jurisdictional stream or wetland, and adhere to all permit conditions, including any required compensatory mitigation.”

Cultural Resources

The Coverage Area is in an area known to be archaeologically sensitive. Minimal grading may occur in association with development of new trails or trail maintenance or vegetation removal that may uncover archaeological resources. Additionally, tree removal under the Catastrophic Event Response Program or Tree Management Program would result in ground disturbance with the potential to unearth unknown archaeological resources. With implementation of Mitigation Measure CUL-1, which requires observation by a qualified archaeological monitor and leaving in place and avoidance of resources if identified during ground disturbance, potential impacts to archaeological or historic resources would be less than significant. If avoidance is infeasible, a Phase II testing and evaluation program shall be implemented. If resources are determined significant or unique through Phase II testing and site avoidance is not possible, appropriate site-specific measures shall be identified in the Phase II evaluation. These measures may include, but would not be limited to, a Phase III data recovery program, capping, or other appropriate actions to be determined by a qualified archaeologist in consultation with the Native American monitor.

Geology and Soils

Minimal grading may occur in association with development of new trails or trail maintenance that may uncover previously unidentified paleontological resources. To address the potential impact of the project to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, Mitigation Measure GEO-1 requires that work in the immediate area shall be temporarily halted and a qualified paleontologist (per Society of Vertebrate Paleontology standards 2010) shall be contacted to evaluate the find. If the discovery proves to be significant and cannot be avoided, additional work, such as salvage excavation, may be required to address any significant impacts.

Additionally, tree removal under the Catastrophic Event Response Program or Tree Management Program would result in ground disturbance that has the potential to unearth and potentially destroy unknown paleontological resources. With incorporation of Mitigation Measure GEO-1 during ground disturbance, potential impacts to paleontological resources would be less than significant.

Hydrology and Water Quality

Overall, impacts related to surface water and groundwater quality would be potentially significant. Incorporation of Mitigation Measures HWQ-1, erosion control best management practices, and HWQ-2, chemical application control plan would reduce water quality impacts to

a less than significant level by minimizing erosion during ground-disturbing activities and reducing application and migration of chemical fertilizers, pesticides, and herbicides used during covered activities. These mitigation measures would minimize the potential for degradation of surface water or groundwater resources, and therefore, would ensure the MBHMP would not conflict with or obstruct implementation of a water quality plan or sustainable groundwater management plan. As a result, impacts would be less than significant with mitigation incorporated.

Noise

The proposed project could result in noise impacts during habitat restoration, trail maintenance, and other activities under the Natural Resource Management Programs, which may involve mechanical equipment such as chainsaws, trucks and lifts, and occasional use of heavy construction equipment. Mitigation Measure N-1 would restrict timing of noise-generating activities to avoid sensitive periods, and would require sound control devices on heavy construction equipment, which would reduce impacts to less than significant with mitigation incorporated.

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