COASTAL CONSERVANCY

Staff Recommendation
November 30, 2023

GREAT REDWOOD TRAIL - WILLITS RAIL WITH TRAIL PROJECT

Project No. 23-080-01
Project Manager: Louisa Morris

RECOMMENDED ACTION: Authorization to disburse up to $3,813,000 to the City of Willits to implement the Willits Rail with Trail Project, consisting of construction of a 1.6-mile trail between East Hill Road and East Commercial Street in the City of Willits, Mendocino County that will eventually become part of the Great Redwood Trail, and adoption of findings under the California Environmental Quality Act.

LOCATION: City of Willits, Mendocino County

EXHIBITS

Exhibit 1: Project Location and Site Maps

Exhibit 2: Photographs

Exhibit 3: Project Letters

Exhibit 4: Initial Study/Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program

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RESOLUTION AND FINDINGS

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed three million eight hundred thirteen thousand dollars ($3,813,000) to the City of Willits ("the grantee") to implement the Willits Rail with Trail Project, consisting of construction of a 1.6-mile trail between East Hill Road and East Commercial Street in the City of Willits that will eventually become part of the Great Redwood Trail.

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, and budget.

2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding.
4. Evidence that all permits and approvals required to implement the project have been obtained.
5. Evidence that the grantee has entered into agreements sufficient to enable the grantee to implement, operate, and maintain the project.

In addition, to the extent appropriate, the City of Willits shall incorporate the guidelines of the Conservancy's 'Coastal Access Project Standards'.

Findings:

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

1. The proposed authorization is consistent with Chapter 9 of Division 21 of the Public Resources Code, regarding a system of public accessways.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Conservancy has independently reviewed and considered the "Willits Rail with Trail Project Initial Study/Mitigated Negative Declaration" adopted by the City of Willits on April 27, 2022, 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.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a $3,813,000 grant to the City of Willits ("City") to implement the Willits Rail with Trail Project, consisting of construction of a 1.6-mile Class I (pedestrian and bicycle), paved, multi-use trail, and trail amenities, within the City of Willits (Exhibits 1 & 2, Project Location Map and Trail Components and Photographs).

The trail will eventually become part of the proposed Great Redwood Trail ("GRT"). The GRT, a trail of statewide importance, is proposed to be developed along the rail right of way of the Great Redwood Trail Agency ("GRTA"), formerly the North Coast Railroad Authority, stretching from San Francisco Bay 316 miles northward to the Samoa Peninsula on the North Spit of Humboldt Bay. When completed, the GRT will be the longest rail trail in the nation. Along the way the GRT will pass through redwood forests, grasslands, agricultural lands, and the currently largely inaccessible wild and scenic Eel River Canyon, before skirting the edge of Humboldt Bay. Portions of the Humboldt Bay and City of Ukiah sections of the GRT have already been built and are managed in partnership with a variety of public agencies and municipalities.

The proposed project will address safety and mobility challenges faced by pedestrians, bicyclists, and equestrians in the City of Willits, and provide a new recreational and transportation trail for resident and visitor use. It will also connect to existing and future trails and pathways throughout the City of Willits and beyond. The City's goal is to make the trail easily accessible to neighborhoods, places of business, schools, and community parks. The trail will facilitate an increase in non-motorized transportation options, leading to a reduction in greenhouse gas emissions and enhanced public health.

The trail will consist of a 10-foot-wide paved asphalt surface with 2-foot-wide shoulders, wide enough to accommodate two-way bicycle, pedestrian, and equestrian travel. The trail will have a center stripe delineating the direction of travel as well as necessary regulatory, warning, and directional signs. The project includes construction of trail amenities including trailheads, benches, interpretive signage, resting areas, crossing improvements, waste and recycling receptacles, and lighting. The trail will be constructed 8-10 feet from and parallel to the existing railroad tracks within the rail right-of-way, widening the existing railroad prism (corridor). Safety fencing (42 inches tall) will be installed between the rail line and the trail, and three new prefabricated aluminum trail bridges will be constructed across Haehl, Baechtel, and Broaddus Creeks. Construction of the trail will include tree and vegetation removal, grading/placement of fill, culvert repair/upgrades, construction of retaining walls/foundations (associated with three bridges), and drainage/stormwater improvements.

The need for safe non-motorized transportation in the disadvantaged and severely disadvantaged community of Willits and the surrounding area has been documented in six recent planning studies and was reinforced by community surveys conducted from 2016 to 2018. Over the course of planning for the project, City staff and consultants engaged with hundreds of community members and held public meetings to share project information and receive and incorporate public comments and ideas into the project design. At these meetings, community members identified over 150 frequently visited destinations located within ½ mile of the trail, 125 of which were within ¼ mile of the Great Redwood Trail.

Site Description: The project site is located entirely within the GRTA right-of-way adjacent to 1.6 miles of rail line that extends between East Hill Road and East Commercial Street. The City is in the process of obtaining an encroachment permit and a license agreement from the GRTA, which will be finalized prior to trail construction. The railroad/GRTA corridor is adjacent to residential, commercial, industrial, and open space uses.

The project area contains four types of sensitive natural resources regulated by federal, state, or local agencies, including wetlands, creeks, riparian corridors, and Valley Oak Woodlands. The project has been designed to minimize impacts to these sensitive natural resources.

Grant Applicant Qualifications: The City of Willits has demonstrated experience administering federal, state, and local funding to support a variety of projects, including design, construction, operations, and maintenance of streets, bridges, sidewalks, trails, water and sewer infrastructure, parks, and airport facilities. City staff will operate and maintain the trail. Operation and maintenance activities will include regular inspections, trash removal, vegetation management, fencing repair, landscaping, repaving, and restriping by Public Works staff.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:

The proposed project is consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, in the following respects:

Selection Criteria

1. **Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.**

See the "Consistency with Conservancy's Strategic Plan" section below.

2. **Project is a good investment of state resources.**

The project provides important benefits to all Californians. In addition to eventually becoming part of the Great Redwood Trail, the project will offer a non-motorized transportation route for pedestrians and bicyclists and a place where Willits residents can recreate and experience nature. Construction is anticipated to begin in early 2024. The budget for the project is reasonable and the project advances statewide goals of building the GRT and is consistent with regional and local plans.

3. **Project includes a serious effort to engage tribes. Examples of tribal engagement include good faith, documented efforts to work with tribes traditionally and culturally affiliated to the project area.**

As noted above, it is anticipated that the proposed trail will eventually become part of the GRT. As part of the GRT planning efforts, the Coastal Conservancy and its GRT Master Planning team have and will continue to engage with tribes that are culturally and traditionally affiliated with the entire GRT project area, with the purpose of developing long-term relationships and creating an ongoing, open, and thoughtful process for tribal representatives to participate in and contribute to the GRT. Through this Conservancy-led process, the Sherwood Band of Pomo have indicated an interest in the Willits Rail with Trail project. In 2021 and 2022, the City of Willits and its archaeological and cultural resource consultant sent consultation requests in connection with the proposed project to eighteen tribal governments that were identified by the Native American Heritage Commission, and no responses have been received to date. As discussed below, the City will implement mitigation measures during project construction to minimize potential impacts to cultural resources.

4. **Project benefits will be sustainable or resilient over the project lifespan.**

The project will be sustainable and resilient over its lifespan. The trail will be composed of asphalt over Class II aggregate, a surface which is expected to last 20 years. The City will be responsible for coordination and financing for the long-term operations and maintenance of the project, and Willits voters recently passed a 0.75-cent sales tax measure to help support the City's maintenance of its recreational facilities, including the current and future trail system. The three bridges (90 feet, 135 feet, and 180 feet in length) that are part of this project will consist of prefabricated aluminum with concrete decking and will be located outside of the FEMA 100-year floodplain. Landscaping will include native trees, shrubs, and grasses with low

water and maintenance requirements. The trail will provide an option for the public to reach destinations without using a car and will reduce greenhouse gas emissions within the community.

5. Project delivers multiple benefits and significant positive impact.

The new trail will be a community asset and deliver numerous benefits over its lifespan, including reduced emissions from fewer automobile trips, a safe route for non-motorized transportation users, and increased accessibility for disadvantaged community members and those without vehicles to destinations including the local hospital, schools, parks, the public library, and places of employment. The project will lead to increased community health and offer a public space for community events, such as bike rodeos, bikeathons, and bicycle safety trainings.

6. Project planned with meaningful community engagement and broad community support.

For over twenty years, local public support has grown for a Class I bicycle and pedestrian trail in the City of Willits within the GRTA's right-of-way, as evidenced by several planning efforts, including the "One Town One Vision" process (1999) and the "Walkable Communities Charrette" (2003). The project was identified by residents as a top priority in both the 2009 Willits Bicycle and Pedestrian Plan and the 2012 Mendocino County Rail with Trail Corridor Plan, and this support was confirmed by the 2017 Mendocino County Active Transportation Plan. Strong support for the project was further demonstrated in a July 2018 Active Transportation Stakeholder Meeting and a Rails-with-Trails Survey completed by nearly 500 residents, where over 70% of respondents said they would use the proposed trail to walk or bike to work or school.

More recently, two rounds of public engagement were conducted as part of the GRT Master Plan planning effort and the Willits Rail with Trail project. These public meetings took place in March 2022 (via Zoom) and March 2023 (in person). The March 2023 Willits Rail with Trail Project community engagement meeting was also a Coastal Conservancy-hosted GRT Master Plan public meeting. This community meeting featured an open house format where community members could learn about the proposed project and discuss their ideas and concerns with involved staff, elected officials, and consultants; over 70 members of the public attended the March 2023 in-person meeting at Willits' Town Hall.

The Willits Chamber of Commerce and the Mendocino Council of Governments submitted letters to the Conservancy in support for the project, which are included as Exhibit 3.

PROJECT FINANCING

Coastal Conservancy	**$3,813,000**
California Active Transportation Program	$4,066,680
Project Total	**$7,879,680**

Conservancy funding is anticipated to come from a Fiscal Year 2022/23 appropriation from the General Fund to the Conservancy for the purpose of "urgent sea-level rise adaptation and coastal resilience needs" (Budget Act 2022, SB 154 as amended by the Budget Act of 2023, SB

101). The coastal resilience funds are available as described in Section 52 of Chapter 258 of the Statutes of 2021, which sets forth a detailed description of the purposes of the coastal resilience funds, including projects for nonmotorized trails of statewide significance. The proposed project is consistent with this funding source because it will fund construction of a trail that will become part of the GRT, which is a nonmotorized trail of statewide significance. Further, in selecting this project for a grant, the Conservancy has considered its Strategic Plan, the State Agency Sea Level Rise Action Plan, geographic areas of vulnerability, disadvantaged communities, and opportunities for federal financial support.

The City of Willits has secured planning and construction grants for the project from the California Active Transportation Program (ATP) and the State Transportation Improvement Program (STIP).

Unless specifically identified as "Required Match," the other sources of funding and in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project will be undertaken pursuant to Chapter 9 of Division 21 of the Public Resources Code (Sections 31400 et seq.) related to public accessways. Section 31409 authorizes the Conservancy to award grants and provide assistance to public agencies to establish and expand inland trail systems that may be linked to the California Coastal Trail. The GRT will connect to and include segments of the California Coastal Trail. Consistent with Section 31409, this authorization would allow the City of Willits, a public municipality, to construct an inland trail that will eventually become part of the larger GRT, thereby linking it to the California Coastal Trail.

CONSISTENCY WITH CONSERVANCY'S 2023-2027 STRATEGIC PLAN:

Consistent with **Goal 1.1 Commit Funding to Benefit Systemically Excluded Communities**, the proposed project will improve recreational conditions within the severely disadvantaged and disadvantaged community of Willits and the surrounding area, including improved transportation options.

Consistent with **Goal 1.4 Incorporate Workforce Development in Our Projects**, the proposed project incorporates workforce development, as portions of the project will be implemented by the California Conservation Corps.

Consistent with **Goal 2.4 Build Trails**, the proposed project will build a new 1.6-mile-long trail that will increase access for both recreation and active transportation purposes. The trail will eventually connect to the GRT, which is one of five flagship trails identified in the Conservancy's 2023-2027 Strategic Plan.

Consistent with **Goal 2.5 Recreation Facilities & Amenities**, the proposed project includes facilities that will enhance recreational opportunities, including benches, linear parks, education and interpretive facilities, public art, and signage.

Consistent with **Goal 4.3 Multi-benefit Nature-Based Climate Adaptation**, implementation of the proposed project will increase community resilience, offering people-powered, non-motorized transportation options that are multi-benefit and integral to nature-based climate adaptation.

CEQA COMPLIANCE:

The March 24, 2022 Willits Rail with Trail Project Initial Study/Mitigated Negative Declaration ("IS/MND") identified potentially significant impacts of the proposed project on Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Hazards & Hazardous Materials, Hydrology & Water Quality, Noise, and Wildfire. The Mitigation Monitoring and Reporting Program ("MMRP") identifies mitigation measures that the project will implement to reduce these potentially significant impacts to less-than-significant levels. With respect to the Mandatory Findings of Significance, the IS/MND concluded that the potential for project-related activities to degrade the quality of the environment, including wildlife species or their habitat, plant or animal communities, or important examples of California history or prehistory would be reduced to less-than-significant levels through implementation of the recommended mitigation measures. Each of these potentially significant impacts and mitigation measures are discussed below.

Aesthetics

Riparian tree removal during construction could result in a potentially significant impact to the visual character or quality of public view of the project site and/or its surroundings. Mitigation Measure BIO-8 (see *Biological Resources* section below) requires replanting of trees and other vegetation, which would reduce this visual impact to a less-than-significant level. Although nighttime construction is not anticipated, it is possible that the project could involve occasional nighttime work periods that would require lighting and, although temporary, may create a new source of light and glare on adjacent residences. This potentially significant impact would be reduced to a less-than-significant level through implementation of Mitigation Measure AES-1, which requires the City and its contractor to prepare and implement a Nighttime Construction Lighting Plan for any nighttime construction work to avoid glare that would be a hazard to vehicles and to avoid light impacts on adjacent residential uses.

Air Quality

The project would generate particulate matter ("PM10") emissions during construction activities, including site preparation (e.g., demolition, clearing/grubbing), grading, excavation, bridge construction, and asphalt paving. Because construction activities could temporarily increase levels of PM10 in a region designated as non-attainment for PM10 (Mendocino County), the impact is considered potentially significant. Implementation of Mitigation Measure AQ-1, which requires the City and its contractor to implement airborne dust control and emission reduction measures during construction activities, would reduce this potentially significant impact to a less-than-significant level.

Biological Resources

It is anticipated that project construction could impact special status wildlife species through noise, visual disturbance, and physical disturbance or displacement of habitat areas. In addition, wildlife and plant species could be permanently or temporarily displaced, injured, or killed, during habitat clearing and grubbing, earthmoving activities, and other construction activities. Mitigation measures to reduce potential impacts to less-than-significant levels are discussed below.

Special Status Plants

In order to reduce potential impacts to special status plants, including Semaphore grass *(Pleuropogon hooverianus),* to a less-than-significant level, Mitigation Measures BIO-1 and BIO-2 require the City to coordinate with the California Department of Fish and Wildlife ("CDFW"), perform updated botanical surveys if necessary, and implement avoidance and/or restoration activities as necessary to protect special status plant species.

Wildlife

Construction of the project may adversely impact special status bat species, including the Townsend's Big-eared Bat *(Corynorhinus townsendii)*, through the removal or modification of trees and/or vegetation, ground disturbance, noise disturbance, and nighttime construction lighting. Implementation of Mitigation Measure BIO-3, which requires the City to schedule tree and structure removal to minimize impacts to bats, perform pre-construction surveys and implement buffers and other avoidance measures if necessary, and minimize nighttime construction lighting, would reduce these potential impacts to a less-than-significant level.

If present in the project area during construction activities, special status and protected migratory birds may be injured or killed due to the clearing and grubbing of vegetation or limbing and removal of trees, and/or potentially displaced from habitat. Potential impacts to special status and protected migratory birds (if present) would be reduced to a less-than-significant level through implementation of Mitigation Measure BIO-4, which requires ground disturbance and vegetation clearing to be conducted outside the avian nesting season, if possible, pre-construction surveys if such timing is not possible, and establishment of buffers around active nests. Removal of riparian vegetation during certain times of the year could potentially impact the Willow Flycatcher (if present), a California Endangered Species Act-listed species. Significant impacts would result if this protected species were harmed, harassed, displaced, or killed by the project. These potentially significant impacts would be reduced to a less-than-significant level through implementation of Mitigation Measure BIO-5, which requires surveys, establishment of buffers around active nests, and consultation with CDFW.

Potential impacts to special status amphibians and reptiles that may utilize creek channels, wetland habitats, or grasslands in the project area would be reduced to a less-than-significant level through implementation of Mitigation Measure BIO-6, which requires pre-construction surveys prior to ground disturbance within 50 feet of suitable habitat, halting construction if special status amphibians or reptiles are observed in an active construction zone, and relocation of individuals and egg masses. Finally, potential impacts to fish and aquatic species would be reduced to a less-than-significant level through implementation of Mitigation

Measure BIO-7, which requires implementation of various erosion control and spill/leak prevention and containment measures to minimize potential impacts to water quality and aquatic habitat.

Habitat and Wetlands

It is expected that riparian habitat, Sensitive Natural Community Habitats (e.g., valley oak woodland areas), and mature trees would either be trimmed, limbed or removed in connection with trail construction, including bridge alterations and/or installation. Implementation of Mitigation Measure BIO-8, which requires environmental awareness training for onsite workers by a qualified biologist, implementation of avoidance and minimization measures, replanting, restoration, and revegetation, and preparation and implementation of a Habitat Mitigation and Monitoring Plan, would reduce potential impacts to a less-than-significant level. Potentially significant impacts to wetlands and creeks, including increased sediment input during construction and fill of wetlands, would be reduced to a less-than-significant level through implementation of Mitigation Measures BIO-7 (discussed above) and BIO-9, which requires mitigation for wetland impacts through restoration, rehabilitation, and/or creation.

Local Policies/Ordinances Protecting Biological Resources

Through implementation of the mitigation measures summarized above, potentially significant impacts related to conflicts with the City of Willits General Plan and (Draft) Urban Forest Management Plan resulting from potential impacts to biological resources would be reduced to a less-than-significant level.

Cultural Resources

Previously recorded historic railroad resources are present in the project area and Mitigation Measure CR-1 requires the City and/or its contractors to design the project to avoid alteration of these areas. If the trail must cross the mainstem lines in these areas, the portion of the trail in the railroad prism must be removable. Archaeological resources were not identified, but a portion of the project area has potential for buried precontact cultural resources and is recommended for archaeological monitoring. If previously unidentified cultural resources are encountered during construction, the impact would be significant. To reduce this potential impact to a less-than-significant level, the project includes Mitigation Measure CR-2, which requires the City to retain a qualified archeologist to conduct archaeological monitoring during ground disturbance activities in those portions of the project area and implement specific protection measures if archaeological resources and/or features or cultural materials are discovered. Although no human remains are known to exist within the Project area, Mitigation Measure CR-3, which includes protocols to follow in the event unanticipated human remains are discovered during construction, would reduce potential impacts to these remains to a less-than-significant level.

Geology & Soils

Excavations will occur as part of the project, especially near bridges and adjacent to the existing railway, and it is possible that paleontological resources may be discovered. Implementation of Mitigation Measure GEO-1, which requires the City and its contractors to divert construction activities away from any fossils encountered during construction and a professional

paleontologist to evaluate the potential resource and make recommendations, would reduce this potentially significant impact to a less-than-significant level.

Hazards & Hazardous Materials

The project would utilize heavy machinery to perform construction activities and if an accident occurs, fuel could be released onto the soil. Mitigation Measure BIO-7 requires implementation of measures to prevent and contain any accidental spills from heavy equipment during construction, which would reduce this potentially significant impact to a less-than-significant level. The project is located along an industrial railroad corridor, which is known to include past use of heavy metals, creosote wood products, and other substances associated with historical railroad activity and construction. In addition, it is possible that certain offsite properties with contaminant concerns may have impacted groundwater and/or soil within the project area. Therefore, construction activities may encounter residual concentrations of hydrocarbons, creosote wood products, and/or other hazardous materials in soil and/or groundwater. Mitigation Measure HAZ-1, which requires the City or its contractor to conduct soil and/or groundwater sampling to determine if substances of concern are present above applicable regulatory thresholds, prepare a site-specific Soil and Groundwater Management Plan, if necessary, to address the proper handling and disposal of impacted soil and groundwater, prepare a Soil Excavation, Stockpiling and Transportation Plan, and implement other measures related to the proper management and disposal of contaminated materials, would reduce this potentially significant impact to a less-than-significant level.

The project is located in an area CalFIRE has identified as a moderate fire hazard severity zone and it is possible fire ignition could occur during construction (e.g., related to heavy equipment usage) and result in potential impacts to people or structures due to a significant risk of loss, injury or death involving wildland fires. Implementation of HAZ-2, which requires the City and its contractor(s) to remove and/or clear away dry, combustible vegetation from the construction site, ensure that vehicles are parked away from combustible materials, and ensure that fire extinguishers are always available and accessible at the construction site, would reduce this impact to a less-than-significant level.

Hydrology & Water Quality

Construction activities such as site clearing, grading, excavation, and material stockpiling could leave soils exposed to rain or surface runoff that may carry soil contaminants (e.g., nutrients or other pollutants) into waterways adjacent to the project site, degrade water quality, and potentially violate water quality standards and/or waste discharge requirements for specific chemicals, suspended sediment, or nutrients and polluted runoff could substantially degrade water quality in the local storm drain system. As described under “Environmental Protection Action 1,” which is included as part of the MMRP, the project will seek coverage under and comply with all requirements associated with the State Water Resources Control Board Order No. 2009-009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, including preparation and implementation of a Storm Water Pollution Prevention Plan. Implementation of Environmental Protection Action 1, combined with Mitigation Measure BIO-7 summarized above, would reduce potential construction-related water quality impacts to a less-than-significant level.

Noise

Although nighttime construction is not anticipated, it is possible that the project could include occasional nighttime work periods which, while temporary, would create an increase in ambient noise levels on adjacent residences. To reduce this potential impact to a less-than-significant level, implementation of Mitigation Measure NOI-1 will require the City and its contractor to implement best management practices to reduce nighttime construction noise levels.

Wildfire

As discussed above, it is possible that fire ignition could occur in the vegetated portions of the project area during construction. To reduce this risk, all hazardous materials and construction equipment would be appropriately used and stored. Implementation of Mitigation Measure HAZ-2 (discussed above) would reduce the potential impact of construction activities on wildland fires to a less-than-significant level by requiring use of construction techniques that minimize fire risk.

Staff has independently evaluated the March 24, 2022 Willits Rail with Trail Project Initial Study/Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program (MMRP) adopted by the City of Willits on April 27, 2022, 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 Title 14 of the California Code of Regulations, Section 15382.

Upon approval of the project, Conservancy staff will file a Notice of Determination.