

COASTAL CONSERVANCY

Staff Recommendation

March 24, 2022

Laguna de Santa Rosa Vernal Pools Habitat Restoration Project

Project No. 21-076-01

Project Manager: Avra Heller

RECOMMENDED ACTION: Authorization to disburse up to \$320,000 to the Laguna de Santa Rosa Foundation to enhance habitat, protect and increase endangered plant species populations, and engage the local community in the restoration and conservation of five vernal pool properties on the Santa Rosa Plain, Sonoma County.

LOCATION: Santa Rosa Plain, Sonoma County

EXHIBITS

Exhibit 1: [Project Location Maps](#)

Exhibit 2: [Site Photos](#)

Exhibit 3: [Letters of Support](#)

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 hundred twenty thousand dollars (\$320,000) to the Laguna de Santa Rosa Foundation (“the grantee”) to enhance habitat, protect and increase endangered plant species populations, and engage the local community in the restoration and conservation of five vernal pool properties on the Santa Rosa Plain, Sonoma County.

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.

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 3 of Division 21 of the Public Resources Code, regarding the Climate Ready Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Laguna de Santa Rosa Foundation is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a grant of three hundred twenty thousand dollars (\$320,000) to the Laguna de Santa Rosa Foundation (“the grantee”) to enhance habitat, protect and increase endangered plant species populations, and engage the local community in the restoration and conservation of five vernal pool properties on the Santa Rosa Plain.

The vernal pools on the Santa Rosa Plain in Sonoma County are a unique ecosystem rich in rare, endemic plants and animals, including several federally-listed endangered species. The Plain’s habitat is made up of vernal pools, seasonal wetlands, and associated grasslands. The 20-mile long (approximately from Cotati in the South to a bit north of Windsor), 6-mile wide (approximately from Sebastopol in the West to Santa Rosa in the East) area supports several federal and state endangered species, including the Sonoma County Distinct Population Segment of the California tiger salamander, Burke’s goldfields, Sonoma sunshine, and Sebastopol meadowfoam. The three plant species are found only in vernal pools and their distribution is limited almost exclusively to the Santa Rosa Plain. Healthy vernal pool ecosystems also provide forage for grazing animals and critical habitat for a range of species from frogs and salamanders to pollinators to waterfowl along the Pacific Flyway.

Many of the rare plants found here have restricted ranges and fragmented habitats, and are particularly vulnerable to climate change. These species cannot simply shift north or upslope to find cooler or wetter conditions. If these rare vernal pool species are to survive, they will need healthy meta populations (a connected grouping of separate populations of a given species in a defined area) spread across multiple pools and properties so that if one location becomes too hot and dry, other healthy regional populations remain.

The biggest threats to Santa Rosa Plain vernal pools are habitat loss, changing climate, and the lack of suitable habitat management. Historically the region was managed first by Native Americans with prescribed fire, and after colonization, European settlers grazed the fertile Plain. These management regimes allowed for a diverse mixture of native and endemic annual wildflowers to flourish. The absence of active management and the related incursion of nonnative grasses causes the vernal pools to dry down more quickly each spring, particularly under hot conditions, and creates thatch (an intertwined layer of living and dead stems, leaves, and roots which accumulates between the layer of actively growing grass and the soil underneath) which then accumulates in the pools and smothers the native flowering plants. The same thatch that is threatening the rare vernal pool species also poses a risk to the surrounding human community: the buildup of fine fuels in urban areas increases the risk of wildfire.

This multi-benefit project will help endemic vernal pool ecosystems adapt to rising temperatures and drought while also helping the surrounding human community adapt to the increased risk of destructive wildfire. While the primary benefits of this project are ecological, the project will also reduce the risk of a grass thatch wildfire. Grass thatch ignites exceptionally quickly and easily, and once ignited burns significantly faster than a grassland without thatch or a woodland, which makes a thatch-based fire more dangerous for firefighters. Across the Santa Rosa Plain vernal pool areas are interspersed within rural residential areas and agricultural businesses (ranches, dairies, and farms), and even adjacent to fully urbanized areas. In summer 2021 two fires in Sonoma County ignited on vernal pool properties with substantial unmanaged thatch build up. Three of the five properties in this project are in locations surrounded by suburban Santa Rosa, and consequently the unmanaged thatch on these properties poses a risk to the surrounding homes and facilities. Managing thatch build up through this project will significantly reduce adjacent property fire risks. Most of the project sites are in CalFire low to moderate fire risk zones.

The Laguna Foundation has been studying and monitoring the vernal pools on the Santa Rosa Plain for over ten years. Over this time, the Foundation has documented the decline of three endangered plant species as well as the degradation of vernal pool habitat on the Plain. The Foundation has observed that as thatch built up in ungrazed and unmanaged vernal pools, the populations of vernal pool dependent species declined. Four years ago, based on studies of Central Valley vernal pools and observations on Santa Rosa Plain vernal pools, the Laguna Foundation began controlling thatch on the Santa Rosa Plain through managed grazing and mechanical removal. This project would expand the organization's ability to implement these thatch management habitat restoration techniques and add the tool of prescribed burning.

The highest-level goals of this project are (1) to coordinate a discontinuous preserve of protected, restored and increasingly climate-adapted vernal pools scattered throughout the Santa Rosa Plain; and (2) improve protection of the vernal pools by educating the public and vernal pool landowners through site visits and stewardship opportunities. Many of the existing vernal pools where the Foundation currently has restoration projects are on private or mitigation properties that are not open to the public. This limits the opportunities that the public have to learn about and connect to vernal pool landscapes and their conservation needs. This project would expand the Foundation's restoration program and partnerships to more

public lands, increasing the opportunity for public education and engagement around these sensitive habitats and species. This project will also allow the Foundation to expand its engagement with vernal pool landowners at the five project sites described below, provide opportunities for other local vernal pool landowners to participate in restoration events, and bring critical prescribed fire back to the Santa Rosa Plain vernal pools on private lands. None of the project sites will be associated with any Endangered Species Act mitigation requirements.

This project leverages existing funding (from local, federal, and private sources) and ongoing collaborations with vernal site property owners to implement a project on five vernal pool properties throughout the Santa Rosa Plain. Project property owners and partners on this project will be the Sonoma County Agricultural Preservation and Open Space District (Ag + Open Space), the City of Santa Rosa, Sonoma County Regional Parks (Parks), Fire Forward, Earle Baum Center for the Blind, Sonoma County Resource Conservation District, and the Redwood Lions Memorial Foundation. The Laguna Foundation will collaborate with the various landowners to reduce the thatch and invasive species to restore habitat quality at the five vernal pools (described in detail below); ensure the long-term survival of two endangered endemic plant species on the Santa Rosa Plain, Sebastopol meadowfoam, and Sonoma sunshine; and expand outreach to the local community to engage the broader public and local vernal pool landowners in the restoration and protection of these unique wetland habitats. The project will be executed over a three-year period and will include habitat restoration, endangered species conservation, community engagement, and landowner restoration planning and education activities. All activities funded under this grant are anticipated to be completed by February 2025.

Two of the five properties (Laguna de Santa Rosa Trail, Balletto Field Parcel, and Earle Baum Center of the Blind) already have vernal pool restoration plans, and the Foundation will be implementing aspects of those existing plans (described further below). On the remaining three properties (Sonoma Valley Regional Park, Sam Jones Hall, and Haroutunian South) project funds will be used to both develop long term site-specific vernal pool restoration plans and to implement habitat restoration work on those properties.

Habitat restoration actions will include reducing buildup of thatch on all properties through mowing, grazing and prescribed fire. Additionally, targeted invasive species will be controlled and eliminated using both mechanical and chemical measures to reduce non-native species contributing to thatch accumulation and overall habitat degradation. The Foundation will work with Fire Forward, an Audubon Canyon Ranch fire prevention training program, to train foundation staff to be able to implement one to two prescribed burns over the course of this project. Habitat restoration actions also include bolstering the communities of two endangered endemic plant species at four sites through onsite seed collection, seed amplification (cultivation of the original seeds and harvesting of the next generation) at the Foundation's nursery, and returning the bulked seeds to suitable habitat after the thatch control. The Laguna Foundation has already successfully used this approach to increase a population of Sebastopol meadowfoam at Balletto Field under their management. The original 400 seeds collected in the field were amplified in the greenhouse to yield approximately 130,000 new seeds.

Community engagement events will include five or more field trips, with at least one field trip to each project site (two of which are not ordinarily open to the public), and five to seven separate stewardship events to allow community members to directly participate in the vernal pool habitat restoration work. The Foundation will in particular recruit local teen participation in the restoration tasks for this project, providing baseline job exposure to this type of conservation work. The Foundation will also provide public education about the project's prescribed fire through their community education program, and a separate targeted demonstration event for City and County elected officials explaining the benefits of returning fire to public lands. This grant will provide funding for the stewardship events. Match funding will be used for the field trips, public outreach involved in the prescribed fire demonstration, and other public education events.

The Foundation will work with the owners of each project site to create recommendations and tools to ensure that habitat conditions, including thatch reduction, are maintained at each site into the future. All participating landowners have expressed commitment to long term management.

Site Descriptions:

Laguna de Santa Rosa Trail, Balletto Field Parcel: The grantee has been working with Sonoma County Regional Parks to restore this 30-acre property, which includes about 20 acres of wet meadow and vernal pool habitat and 10 acres of riparian forest. Laguna de Santa Rosa Foundation applied for and received \$75,000 from the Sonoma County Water Agency in 2018 to reestablish a grazing program and propagate and spread the small existing population of Sebastopol meadowfoam to the pools that it is known to have occupied.

The Balletto Field property is located just beyond downtown Sebastopol, and contains a former agricultural field historically grazed by dairy cattle and subsequently row-cropped. Once transferred to public ownership it lay fallow until the Laguna Foundation began working with Parks to manage grazing on the Balletto Field parcel. Parks and the Laguna Foundation currently manage a grazing lease with a local rancher and also use the site to provide public outreach concerning vernal pool management. A public trail on the property is a key location for field trips and public stewardship events. This is one of two sites in this project where prescribed fire has been identified as a potential new thatch control technique. The goal of the use of fire on this property would be to control for invasive pepperweed, and to keep the thatch down with limited grazing post fire. The Foundation will work with Parks to amend post-restoration management recommendations specific to Balletto Field once they see if prescribed fire is a successful restoration tool on this property.

Earle Baum Center of the Blind: This property is owned by the Redwood Lions Memorial Foundation and is located in unincorporated Sonoma County. The property contains structures for the Earle Baum Center, a non-profit organization that provides services to people who are blind or visually impaired. The eight-acre vernal pool portion of the property was historically grazed by a dairy herd but is currently mowed by the facilities staff. This site will likely never be grazed, as it includes a walking trail that is used for mobility training for the visually impaired.

However, mowing has been an adequate substitute for thatch management. Though this site is open to the public, access has been limited during the COVID-19 pandemic. The trails around the pools are used to train people with vision loss to walk with canes or dogs. This property will be a main project site for public education events.

The Laguna Foundation and the Earle Baum Center have a long history of working together to manage these pools. The Foundation has received two grants to improve access and education about the pools and worked to create a restoration management plan that includes addressing the thatch through seasonal mowing and hand raking the pools. The Foundation has a current \$50,000 grant from the US Fish and Wildlife Service (USFWS) to propagate and spread the Sebastopol meadowfoam, and to plant native trees and shrubs in the uplands surrounding the pools on this property. This property is also a project site for endangered plant restoration and invasive species control and elimination.

Sonoma Valley Regional Park: This five-acre vernal pool project site is within the larger Sonoma Valley Regional Park, which is managed by Sonoma County Regional Parks. The property is located in unincorporated Sonoma County, and the project area is surrounded by rural residences, a dog park, the oak woodlands of the remainder of the park, and Highway 12. Immediately across the highway are several commercial businesses; beyond that is Bouverie Preserve owned by Audubon Canyon Ranch. Nearly the entire park, including the vernal pool area, burned in the 2017 Nuns Canyon Fire. The project location was burned a second time with prescribed fire in 2018. With the exception of the single 2018 prescribed fire event, there has been no other restoration work in this vernal pool area. The Laguna Foundation and Sonoma County Regional Parks received a grant from the US Environmental Protection Agency for \$66,000 in 2021 to propagate and spread Sonoma sunshine, start controlling invasive species and re-route the perimeter fence to further protect the vernal pools.

If awarded, funding from the Conservancy's grant will be used to develop a site specific vernal pool habitat restoration plan. This site will also potentially be one of the project's prescribed fire demonstration sites.

Sam Jones Hall: This nine-acre property is owned by the City of Santa Rosa and includes a homeless shelter. Residential areas are to the north and west; the parcels to the east and south are undeveloped. This property was previously mowed and baled by a local farmer, which curtailed invasive species and reduced thatch accumulation; however, the City discontinued all site management over five years ago, and the vernal pool areas have been fallow since.

The site is part of the Laguna de Santa Rosa Foundation's annual rare plant monitoring program, and the existing population of Sebastopol meadowfoam is in decline due to lack of management of the site. The grantee will work with the City of Santa Rosa to explore vernal pool restoration options, and create recommendations for this site to stabilize and restore the endemic meadowfoam population. This site is not generally open to the public, but the Foundation will organize to provide public access at this site through the project's educational programming.

Haroutunian South: This 20-acre property is owned by Sonoma Ag + Open Space. The property is located in unincorporated Sonoma County and is currently being grazed by cattle from the

neighboring ranch; additionally, the perimeter is mowed annually for fuels reduction and fire control. The grantee began working with Ag + Open Space in 2020 to fine-tune the grazing at this site, manage the thatch and invasive species more effectively, and support the sensitive habitats. Ag + Open Space also supports and provides funding for public education and stewardship events at this property.

The project will support the restoration of the two endangered plants (Sonoma sunshine and Sebastopol meadowfoam) present on this property to two vernal pool sites, and will conduct targeted invasive species control and elimination potentially introducing prescribed fire as a management technique on this site.

Grant Applicant Qualifications: The Laguna de Santa Rosa Foundation was founded in 1989 as a place-based organization focused on restoration and conservation of the Laguna de Santa Rosa and surrounding wetland communities. The grantee is currently managing 25 projects with a combination of federal, state, and local funding, and has a strong record of successfully completing similar projects. These include projects with funding from the State Coastal Conservancy, such as most recently a riparian restoration grant for a project on Irwin Creek. The Laguna de Santa Rosa Foundation has more than ten years of experience monitoring vernal pools and four years of direct vernal pool habitat management experience. The grantee has completed successful pilot thatch management and species conservation projects and will be collaborating with Fire Forward to plan and implement the controlled burns proposed in the project. Two members of the grantee’s staff are currently in a fellowship with Fire Forward and will create burn plans and implement their first prescribed fires this winter.

CONSISTENCY WITH CONSERVANCY’S PROJECT SELECTION CRITERIA:

The proposed project is consistent with the Conservancy’s Project Selection Criteria and Guidelines, 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 is a good investment of the Conservancy’s Climate Ready program funding for the following reasons. The Laguna de Santa Rosa Foundation has been implementing similar vernal pool project work for over four years now, has strong standing relationships with the landowners identified in their proposal, has leveraged significant non-state funding (see “Project Financing” section below). The Foundation also intends to organize significant volunteer engagement in the project. This project advances statewide endangered species protection and restoration goals, as well as the state’s 30x30 Executive Order, by enhancing

endangered species populations and making sensitive vernal pool habitats more resilient to future climate change impacts. The project is also consistent with a variety of statewide plans, including advancing the Biodiversity and Habitat goals of the “Safeguarding California: Implementation Action Plan;” and the USFWS Recovery Plan for the Santa Rosa Plain, which calls for restoring and enhancing habitat for Sebastopol meadowfoam and Sonoma sunshine.

The project also addresses goals identified in a variety of local plans including: The Vital Lands Initiative: A vision for land conservation in Sonoma County (Sonoma County Agricultural Preservation and Open Space District), which identifies vernal pools as high priority wetlands in need of protection. The project advances the Climate Action and Resiliency Goals of the Sonoma County Strategic Plan; specifically, “Goal 5: Maximize opportunities for mitigation of climate change and adaptation through land conservation work and land use policies” includes objectives to increase overall landscape and species resiliency and reduce the risk of fire and biodiversity loss. And finally, the project supports implementation of the City of Santa Rosa General Plan. The project achieves two specific goals of this plan: “Open Space and Conservation Goal-D: Conserve wetlands, vernal pools, wildlife ecosystems, rare plant habitats, and waterways” and “Youth and Family Goal-D: Encourage teen participation in organized activities.”

Finally, the grantee currently funds project monitoring at these various sites and is committed to continue to monitor the project after the completion of this grant. The grantee plans to apply for Section 6 funding through the California Department of Fish and Wildlife to expand the project’s work to additional properties, to develop a better picture of the entire population of all of the vernal pool species.

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

This project’s enhancement of sensitive vernal pool habitats and expansion of the site-specific population of two endangered native plant species should increase the species’ ability to withstand and adapt to expected climate change impacts including extreme heat, and flashier precipitation events. The management plans and educational outreach this project will develop and conduct will help partners and other local landowners to implement more sustainable invasive thatch management which will improve habitat values and reduce wildfire risks.

4. Project delivers multiple benefits and significant positive impacts.

This project provides co-benefits and alleviates multiple stressors by reducing wildfire risk through invasive plant thatch management and increasing the resilience of the Sonoma Plain’s sensitive endemic vernal pool ecosystems and related endangered plant species. Improving these habitats and expanding the metapopulations of endemic plant species will ensure they are more resilient to the future impacts of climate change.

The project also increases community-preparedness and resilience to future climate change impacts, particularly wildfires, not only through direct fuels management (thatch reduction) but also by increasing the Laguna Foundations’ ability to implement managed burns, and through the project’s public education and outreach about the necessity of implementing prescribed fire and other thatch management techniques on both public and private properties.

The project provides community benefits through volunteer stewardship opportunities.

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

To implement this project the Laguna de Santa Rosa Foundation has engaged, and through this grant will expand their engagement, with a broad collaboration that includes a wide range of community groups. In addition to the various landowners and project partners listed above, this project’s collaboration with the Sonoma County Resource Conservation District will allow the Foundation to expand their engagement of local ranchers and dairy producers in the organization’s vernal pool work. The Foundation is dedicated to engaging the Spanish speaking communities surrounding the vernal pools, and to that end, it recently hired a bilingual educator to ensure that the Foundation can offer vernal pool programs in Spanish and provide educational materials in Spanish and English. Finally, some of the intended education and outreach opportunities will be directed specifically towards youth stewardship opportunities. The Foundation currently works with local teens as camp counselors in the Foundation’s summer camp program, and they are hoping to use funds provided for in this grant to create stewardship and conservation job-training opportunities for local youth.

This project received letters of support from California Senator, Mike McGuire, Sonoma County Supervisor, Lynda Hopkins, and project partners, Sonoma County Agriculture and Open Space District, the City of Santa Rosa, and Sonoma County Regional Parks. The project partner letters were part of Laguna de Santa Rosa’s application. Staff is including these letters in this recommendation to the Conservancy’s Board (please note that some of the letters are addressed to staff, not to the Board Chair) (Exhibit 3).

PROJECT FINANCING

Coastal Conservancy	\$320,000
United States Fish and Wildlife Service	\$40,000
United States Environmental Protection Agency	\$60,000
Sonoma County Water Agency	\$18,000
Sonoma County Regional Parks	\$60,000
Sonoma County Agricultural Preservation and Open Space District	\$30,000
Laguna de Santa Rosa Foundation	\$19,500
Project Total	\$547,500

Conservancy funds are anticipated to come from FY 2018/19 appropriations to the Conservancy from the “California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018” (Prop 68, Public Resources Code Division 46, Chapters 1-13, Sections 80000-80173). In particular, Chapter 10 of Prop 68 allocates funds to the San Francisco Bay Area Conservancy Program for projects to improve a community’s ability to adapt to the unavoidable impacts of climate change; improve and protect coastal and rural economies, agricultural viability, wildlife corridors, or habitat; develop future recreational opportunities; or enhance drought tolerance, landscape resilience, and water retention. (Pub. Res. Code sections 80130 and 80133(b)).

The recommended project is within the San Francisco Bay Area Program and will be undertaken pursuant to the Climate Ready Program established in Chapter 3 of the Conservancy's enabling legislation at Division 21 of the Public Resources Code. The project purpose is to increase the Santa Rosa Plain's unique vernal pool habitats' resilience to future climate change impacts, particularly by increasing the health of local endemic special status plant populations, reducing invasive species populations and engaging with landowners and the community in the restoration and conservation of five vernal pool properties on the Santa Rosa Plain, Sonoma County.

The proposed project was selected through a competitive grant process under the Conservancy's "Proposition 68 Guidelines San Francisco Bay Area Conservancy Program - Climate Adaptation Funds" adopted August 22, 2019. The proposed project meets the evaluation criteria in the Proposition 68 Guidelines as described in detail in this section, the "Project Summary" section above, and in the "Consistency with Conservancy's Project Selection Criteria" section above.

A total of \$277,500 in additional funding has been secured for this project from the following sources: United States Fish and Wildlife Service, \$40,000; United States Environmental Protection Agency \$60,000; Sonoma County Water Agency \$18,000; Sonoma County Regional Parks, \$60,000; Sonoma County Agricultural Preservation and Open Space District, \$30,000; and Laguna de Santa Rosa Foundation, \$19,500. In addition, the Foundation estimates that about \$10,000 in-kind funding will be used in support of this project in the form of volunteer hour participation in the project's stewardship program. Unless specifically labelled "Required Match" the other sources of funding listed above are provided as estimates. The Coastal Conservancy does not typically require matching funds nor does it require documentation of expenditures from other funders. Typical grant conditions require Grantees to provide any funds needed to complete the project.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

Section 31113 of Chapter 3 of Division 21 of the Public Resources Code authorizes the Conservancy to address the impacts and potential impacts of climate change on resources within the Conservancy's jurisdiction (Section 31113(a)). The recommended project will address resources within the Conservancy's jurisdiction because it will be undertaken within the City and County of San Francisco, one of the nine counties of the San Francisco Bay Area (Chapter 4.5 of Division 21 of the Public Resources Code).

Section 31113, subsections (b) and (c) authorize the Conservancy to award grants to nonprofit organizations and public agencies to undertake projects including those that address extreme weather events that threaten coastal communities, infrastructure, and natural resources. Consistent with this section, the recommended project will enhance natural lands and wetlands and protect two endangered native plant species from the impacts of extreme heat and drought associated with climate change. The project will also help mitigate the risk of catastrophic wildfire in the local community by reducing the amount of grass thatch in the project area. Additionally, this project is consistent with section 31113(d) in that the project

provides multiple benefits in the form of habitat restoration, endangered species protection and population restoration, reduced fire risk, and public education on the value of prescribed fire and other thatch management techniques that will be used to implement this project.

Section 31113(d)(2) requires that the Conservancy provide information to the Office of Planning and Research (OPR) on any projects funded pursuant to this subdivision. Consistent with this section, the Conservancy will provide relevant information to OPR.

CONSISTENCY WITH CONSERVANCY'S [2018-2022 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 12 Objective D** of the Conservancy's 2018-2022 Strategic Plan, the proposed project enhances seasonal wetlands and upland habitat.

Consistent with **Goal 12 Objective G**, the project aims to manage non-native invasive species that threaten an important Bay Area habitat type.

Consistent with **Goal 8 Objective C**, the project aims to increase specific vernal pool habitat species' climate change resilience, while also working to reduce fire risks to adjacent natural and built communities.

CEQA COMPLIANCE:

This project is exempt from CEQA pursuant to Code of Regulations title 4, § 15304 (Minor Alterations to Land). A minor alteration to land consists of minor public or private alterations in the condition of land, water and/or vegetation, which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. This project involves removal of thatch and non-native vegetation on a small-scale using mowing, grazing, prescribed fire, and limited mechanical and chemical control measures. Native plants will be introduced to replace the removed vegetation as appropriate.

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