

Memorandum

Date: December 15, 2022
To: Board of Directors
From: Kellyx Nelson
Re: Notice of Determination of Exemption from Environmental Review for San Gregorio Creek Habitat Enhancement Phase III

San Gregorio Creek Habitat Enhancement Phase III will benefit species at risk of extinction including federally threatened steelhead, federally endangered coho salmon, as well as other native aquatic species. The project will improve creek habitat by installing natural habitat features (trees and rocks) to increase the diversity of habitats fish need to forage, take refuge, rest, rear, and spawn. The 14 habitat features will be installed over a half mile of lower San Gregorio Creek. Implementation is planned to take place in summer and fall 2024 and will last for approximately six weeks.

As the lead agency for the project, the San Mateo RCD has the principal responsibility for carrying out the project and must ensure its compliance with CEQA (California Environmental Quality Act) including determining whether it is subject to the exemptions listed in CEQA Guidelines.

San Mateo RCD issued a Notice of Exemption for the San Gregorio Creek Habitat Enhancement Phase III project. It is exempt under CEQA according to Class 33, Section 15333: Small Habitat Restoration Projects because the project is for the purpose of habitat restoration and protection of fish and wildlife habitat and is less than five acres in size. There would be no significant adverse impact on endangered, rare, or threatened species and the project will specifically result in improved habitat for threatened and endangered species.

The *Notice of Exemption and CEQA Exemption Discussion* for the San Gregorio Creek Habitat Enhancement Phase III project are attached. These documents provide a determination of the project's consistency with the categorical exemptions to CEQA.

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: (Public Agency): _____

County Clerk

County of: _____

(Address)

Project Title: _____

Project Applicant: _____

Project Location - Specific:

Project Location - City: _____ Project Location - County: _____

Description of Nature, Purpose and Beneficiaries of Project:

Name of Public Agency Approving Project: _____

Name of Person or Agency Carrying Out Project: _____

Exempt Status: **(check one):**

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: _____
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

Lead Agency

Contact Person: _____ Area Code/Telephone/Extension: _____

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: Christina Kellscher Date: _____ Title: _____

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

CEQA Exemption Discussion

Project Title: San Gregorio Creek Habitat Enhancement Phase III
Project Location: 2320 La Honda Rd
San Gregorio, CA, 94020
The project site is located off La Honda Road, approximately 2 miles east of the intersection of CA-1 and CA-84, within the San Gregorio Creek watershed in unincorporated San Mateo County.
Assessor's Parcel Numbers: 081290180
City and County: San Gregorio, San Mateo County

Description of Nature and Purpose of Project:

The San Gregorio Creek Habitat Enhancement Phase III (project) will enhance creek habitat to benefit the federally threatened steelhead trout (*Oncorhynchus mykiss*) and the federally endangered coho salmon (*Oncorhynchus kisutch*), as well as other native aquatic species such as the California Department of Fish and Wildlife species of special concern Pacific lamprey (*Entosphenus tridentatus*). The project will improve creek habitat through installation of natural habitat features using large woody debris (LWD) to increase complexity. The project will take place in San Gregorio, within the San Gregorio Creek watershed in unincorporated San Mateo County, CA. The property is used primarily for agriculture and is surrounded by other parcels zoned for the same use.

Increasing the amount of wood in the creek will interrupt and decrease water velocities during winter high flows, create side-channel habitat where feasible, increase size and cover of pools during summer low flows, and sort and store sediment. These enhancements provide the diversity of habitat fish need to forage, take refuge, rest, rear, and spawn. The goals of these structures are to improve cover in existing pools, scour new pools, provide high-flow and low-velocity refugia, provide physical cover, enhance floodplain habitat, and aggrade material to improve floodplain connectivity.

The project will install 14 large wood habitat features over approximately 0.5 miles of creek, with a total of 19-20 pieces of large wood. Feature installation will use an anchored method, with the intent to utilize on-site materials where possible. Five structure designs will be used that each include 1-2 redwood or eucalyptus logs, some with rootwads attached. Some structures will also use anchor boulders, and some include alders. For structures that do not include anchor boulders, soil anchors will be utilized to secure the structures. Construction is planned to take place in summer and fall 2024, beginning as early as May and ending by October 31. Construction activities are expected to last for approximately six weeks.

Name of Person, Board, Commission or Department Proposing to Carry Out Project:

San Mateo Resource Conservation District
Kellyx Nelson
80 Stone Pine Road, Suite 100
Half Moon Bay, CA 94019

EXEMPT STATUS:

Categorical Exemptions, Class 3 [CEQA State Guidelines, Section 15333]

REMARKS: See page 3.

Contact Person: Christina Kelleher

Telephone: (650) 712-7765 x 127

11/16/2022

Date of Determination

I do hereby certify that the above determination has been

Christina Kelleher

Christina Kelleher, Conservation Project Manager
San Mateo Resource Conservation District

REMARKS:

As described below, the San Gregorio Creek Habitat Enhancement Phase III (project) meets the CEQA criteria for exemption from environmental review under Class 33, Section 15333. This section of the guidelines describes Small Habitat Restoration Projects that do not exceed 5 acres in size and are constructed for the purpose of maintenance, restoration, enhancement, or protection of habitat for fish, plants, and wildlife.

The proposed restoration project is less than 1 acre in size and is for the purpose of habitat improvement for federally threatened and endangered fish and other aquatic species. The project involves installation of habitat features that will enhance 0.5 miles of San Gregorio Creek in accordance with California Department of Fish and Wildlife (CDFW) and the National Oceanic and Atmosphere Administration (NOAA) Fisheries guidelines.

Project Description

The project will enhance 0.5 miles of creek habitat to benefit the federally threatened steelhead trout (*Oncorhynchus mykiss*) and the federally endangered coho salmon (*Oncorhynchus kisutch*), as well as other native aquatic species such as the California Department of Fish and Wildlife species of special concern Pacific lamprey (*Entosphenus tridentatus*). The project will improve creek habitat through installation of natural habitat features using large woody debris (LWD) to increase complexity. The project will take place in San Gregorio, within the San Gregorio Creek watershed in unincorporated San Mateo County, CA. The property is used primarily for agriculture and is surrounded by other parcels zoned for the same use.

The San Gregorio Creek watershed is the second largest watershed in coastal San Mateo County, draining an area of approximately 33,290 acres, including five primary sub-basins. The project site covers a reach of approximately 2,700 feet on private property in the lower San Gregorio Creek watershed, approximately 2 miles east of the intersection of CA-1 and CA-84. The agricultural property primarily grows pumpkins, hay, and flowers. The property is also an active ranch, and an off-stream water reservoir in the form of an above-ground pond was built on the property in 2017 with the goal of increasing water security for the landowner and improving streamflow for sensitive species. The project area consists of riparian habitat next to a large field, which is used for the agricultural and ranching activities. The project site consists of long section of plane bed geology with some pools forming on creek beds. Rare locations of existing large wood can be found within the project reach.

A low abundance of instream large wood and reduced instream habitat complexity were identified as major limiting factors in the San Cruz Mountains Diversity Strata in NMFS's recovery plans for Central California Coast (CCC) coho salmon and CCC steelhead (NMFS 2012, NMFS 2016). Lack of wood has been identified as a limiting factor for salmonids in this watershed (Stillwater Sciences 2010, Alford 2013). In recent years, NOAA's National Marine Fisheries Service (NMFS) has worked with staff from local Resource Conservation Districts, California Department of Parks and Recreation, California Department of Fish and Wildlife, and other local partners to develop plans for a large wood program for anadromous streams located in the Santa Cruz Mountains region.

San Gregorio Creek is listed as a high priority creek by various state and federal agencies for a range of reasons. San Gregorio Creek is considered a Critical Coastal Area by the California Coastal Commission, and it is listed as one of the 10 highest priority watersheds based on existing water quality conditions, value and sensitivity of coastal resources, new or expanding threats to beneficial uses, and degree of local support for watershed-based planning efforts. The watershed is also a federal conservation priority

and is identified as a focus watershed for recovery of critically endangered species. Additionally, all accessible stream reaches in the San Gregorio Creek watershed are designated as critical habitat for the CCC coho salmon Evolutionary Significant Unit and CCC steelhead Distinct Population Segment. Steelhead trout are known to be present in the work area and there is potential for coho salmon.

Increasing the amount of wood in the creek will interrupt and decrease water velocities during winter high flows, create side-channel habitat where feasible, increase size and cover of pools during summer low flows, and sort and store sediment. These enhancements provide the diversity of habitat fish need to forage, take refuge, rest, rear, and spawn. The goals of these structures are to improve cover in existing pools, scour new pools, provide high-flow and low-velocity refugia, provide physical cover, enhance floodplain habitat, and aggrade material to improve floodplain connectivity.

14 large wood habitat features will be installed over the project reach, with a total of 19-20 pieces of large wood. Feature installation will use an anchored method, with the intent to utilize on-site materials where possible. Five structure designs will be used that each include 1-2 redwood or eucalyptus logs, some with rootwads attached. Some structures will also use anchor boulders, and some include alders. For structures that do not include anchor boulders, soil anchors will be utilized to secure the structures. Construction is planned to take place in summer and fall 2024. Mobilization may begin as early as May, but in-channel work would be restricted to the dry season, between June 15 and October 31. Construction activities are expected to last for approximately six weeks. Avoidance and minimization measures and best management practices will be implemented during construction to reduce potential for impacts to sensitive species and their associated habitats.

Class 33 (CEQA State Guidelines, Section 15333) Small Habitat Restoration Projects

Class 33 consists of projects not to exceed five acres in size to assure the maintenance, restoration, enhancement, or protection of habitat for fish, plants, or wildlife. The following four bullets list the criteria for projects to meet Categorical Exemption 15333 as described in the CEQA Statute and Guidelines.

(a) There would be no significant adverse impact on endangered, rare or threatened species or their habitat pursuant to section 15065

The proposed project is designed specifically to benefit threatened and endangered fish. The project would provide the diversity of habitat fish need to forage, take refuge, rest, rear, and spawn.

To the maximum extent possible, temporary and localized impacts to sensitive habitats would be minimized by implementing the mitigation measures and construction-related best management practices. All large wood at the project work site will be anchored with hardware as described in CDFG's California Salmonid Stream Habitat Restoration Manual, 4th edition (CDFG 1998). Instream structure is provided by strategically placing appropriately sized logs or logs with rootwads in the active channel. For this project, wood placement will be done from the top of bank and will not require equipment to work in the active channel. All work along the banks will be conducted with a rubber-tired tractor to reduce impacts to the soil. All logs will be anchored to existing mature riparian vegetation or boulders with the intent of minimizing downstream movement while providing a collection point for existing instream large and small wood. Small woody debris (SWD) may also be added with project logs as described in the site designs. Where feasible, project wood will be sourced from onsite, non-riparian standing trees. The size of logs, number of logs and the spacing between project sites are designed to reflect natural stream dynamics and help in achieving restoration of the stream's original heterogeneous nature. Construction

within the creek will occur during the dry season, minimizing the potential for erosion and any construction-related effects on aquatic species. Additionally, erosion control measures, such as fiber rolls will be installed to further reduce the risk of sedimentation resulting from project activities. Disturbed areas will be winterized and re-vegetated as needed following construction.

The project does not have the potential to degrade the quality of the environment and would not substantially reduce the habitat or threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of any endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory.

(b) There are no hazardous materials at or around the project site that may be disturbed or removed

No hazardous materials are known to the site or project vicinity.

(c) The project will not result in impacts that are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The proposed project will not result in impacts that are significant when viewed in connection with effects of past, current, and probable future projects because all such projects comply with requirements of regulatory permits issued for the purpose of protecting natural resources. Overall, the project would improve fish habitat in the creek. The project would not adversely affect farmland, public services, geologic stability, soils, or health risk. There are no known or planned overlapping projects in the vicinity that would have environmental impacts to which the proposed project would add cumulatively.

(d) Examples of small restoration projects may include, but are not limited to:

(3) stream or river bank revegetation, the primary purpose of which is to improve habitat for amphibians or native fish; and

The project would be exempt under the above-cited classifications as it involves restoration of San Gregorio Creek for the primary purpose of habitat improvement for native fish through installation of large wood features to provide the diversity of habitat fish need to forage, take refuge, rest, rear, and spawn. The goals of the large wood structures are to improve cover in existing pools, scour new pools, provide high-flow and low-velocity refugia, provide physical cover, enhance floodplain habitat, aggrade material to improve floodplain connectivity, and reduce incision and sediment deposition by slowing flows.

CEQA State Guidelines Section 15300.2 states that a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. As described above, there are no unusual circumstances surrounding the proposed project that would suggest a reasonable possibility for a significant environmental effect.

REFERENCES

Alford, C. 2013. San Gregorio Creek Large Woody Debris Inventory and Assessment Report, prepared for San Mateo County Resource Conservation District, American Rivers California Conservation Program, Publication No. AR-CA-2013-01, 44 p.

California Department of Fish and Game (CDFG). 1998. California Salmonid Stream Habitat Restoration Manual. Fourth Edition. Available online at:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=22610&inline>

National Marine Fisheries Service (NMFS). 2012. Recovery plan for the evolutionarily significant unit of Central California Coast coho salmon. Volume 1. National Marine Fisheries Service., Southwest Region. Available online at: <https://repository.library.noaa.gov/view/noaa/15987>

National Marine Fisheries Service (NMFS). 2016. Final Coastal Multispecies Recovery Plan for California Coastal Chinook Salmon, Northern California Steelhead and Central California Coast Steelhead. Available online at: <https://www.fisheries.noaa.gov/resource/document/final-coastal-multispecies-recovery-plan-california-coastal-chinook-salmon>

Stillwater Sciences. 2010. San Gregorio Creek Watershed Management Plan. Available online at: http://www.sanmateorcd.org/SanGregorioWMP_final.pdf