

Wade Crowfoot | Secretary for Natural Resources | Council Chair Yana Garcia | Secretary for Environmental Protection Eleni Kounalakis | Lieutenant Governor Ben Allen | State Senator Dawn Addis | State Assemblymember Alexis Jackson | Public Member Megan Rocha | Public Member

Staff Recommendation

June 10, 2025

Item 9

Consent Item:

Consideration and Approval of Disbursement of Funds for Senate Bill 1 Sea Level Rise Adaptation Planning Grant Program

Megan Williams, Coastal Resilience Program Manager

Recommended Action: Authorization to disburse up to \$3,035,032 to various grantees who submitted successful applications to the Senate Bill 1 Sea Level Rise Adaptation Planning Grant Program (SB 1 Grant Program) for sea level rise (SLR) adaptation planning or implementation projects, as follows:

- 9.1 Up to \$750,000 to the San Mateo County Flood and Sea Level Rise Resiliency District for the "Brisbane Shoreline Resilience Plan"
- 9.2 Up to \$593,877 to the Town of Tiburon for the "Adaptation Plan and Vulnerability Assessment for Town of Tiburon"
- 9.3 Up to \$590,000 to the City of Hermosa Beach for the "Hermosa Beach Vulnerability Assessment and SLR Adaptation Plan"
- 9.4 Up to \$425,755 to the City of Solana Beach for the "Solana Beach Sea Level Rise Adaptation Project"
- 9.5 Up to \$675,400 to the City of Ventura for the "City of Ventura for the City of Ventura Sea Level Rise Community Co-Designed Adaptation Planning"

Location: Statewide

Strategic Plan Goals and Objectives: Goal 1: Safeguard Coastal and Marine Ecosystems and Communities in the Face of Climate Change; Objective 1.1: Build Resiliency to Sea-Level Rise, Coastal Storms, Erosion and Flooding

Equity and Environmental Justice Benefits:

The SB 1 Grant Program meets many of the strategies and actions outlined in Goal 1 of OPC's Equity Plan, which is to establish and implement more inclusive community engagement and funding methods to expand and enhance opportunities for ocean and coastal projects, policies, and research. According to the SLR Adaptation Criteria, each project, regardless of phase, must include outreach, education, and community engagement, especially to environmental justice (EJ) communities and tribes, as part of the project's scope. Equity and EJ benefits include community engagement, locally driven adaptation priorities, improved coastal habitat, and safer coastal access.

Findings and Resolution:

Staff recommends that the Ocean Protection Council (OPC) adopt the following findings:

"Based on the accompanying staff report and attached exhibit(s), OPC hereby finds that:

- 1. The proposed projects are consistent with the purposes of Division 26.5 of the Public Resources Code, the California Ocean Protection Act;
- 2. The proposed projects are consistent with the Budget Act of 2022 which included a \$37.5 million Greenhouse Gas Reduction Fund appropriation for implementation of Chapter 236 of the Statutes of 2021 (SB 1); and
- 3. The proposed projects are not 'legal projects' that trigger the California Environmental Quality Act (CEQA) pursuant to Public Resources Code section, section 15378."

Staff further recommends that OPC adopt the following resolution pursuant to Sections 35500 *et seg.* of the Public Resources Code:

"OPC hereby approves the authorization to disburse up to \$3,035,032 to various grantees who submitted successful applications to the Senate Bill 1 Sea Level Rise Adaptation Planning Grant Program for sea level rise adaptation planning or implementation projects, as follows:

- Up to \$750,000 to the San Mateo County Flood and Sea Level Rise Resiliency District
- Up to \$593,877 to the Town of Tiburon
- Up to \$590,000 to the City of Hermosa Beach
- Up to \$425,755 to the City of Solana Beach
- Up to \$675,400 to the City of Ventura

This authorization is subject to the condition that prior to disbursement of funds, each grantee shall submit for the review and approval of the Executive Director of the OPC detailed work plans, schedules, staff requirements, budgets, and the names of any contractors intended to be used to

complete the projects, as well as discrete deliverables that can be produced in intervals to ensure the projects are on target for successful completion. All projects will be developed under a shared understanding of process, management, and delivery."

Executive Summary:

Staff recommends that the Ocean Protection Council approve the disbursement of up to \$3,035,032 to fund five projects submitted by local and regional governments that successfully met the requirements of the Senate Bill 1 Sea Level Rise Adaptation Planning Grant Program (SB 1 Grant Program) and will result in sea level rise (SLR) adaptation planning or implementation projects. In August of 2023, OPC approved the disbursement of up to \$95.9 million for the SB 1 Grant Program to fund SLR adaptation planning or implementation projects.

The overall goal of the SB 1 Grant Program is to provide funding for coastal communities to develop consistent SLR adaptation plans and projects to build resilience to SLR along the entire coast of California and San Francisco Bay. To achieve this goal, the SB 1 Grant Program offers two tracks of funding: one for pre-planning and planning phases (Track One), and one for the project and implementation phase (Track Two). Track One (projects in the Pre-Planning, Data Collection, and Planning Phases) opened for proposal submission in December of 2023, and accepts proposals on a non-competitive, rolling, quarterly basis, provided the proposals satisfy the program requirements. Track Two proposals (Implementation Project Phase) will be accepted through a future competitive process, subject to availability of funding. However, recognizing the importance of funding timely implementation projects, OPC is currently accepting the submission of Track Two Letters of Intent (LOI) for urgent projects that address current and on-going SLR threats.

The total amount requested across all five projects is \$3,035,032. These projects cover a variety of critical areas, including pre-planning, data collection, and detailed adaptation planning. All proposals were reviewed by OPC staff, in collaboration with either California Coastal Commission (CCC) or San Francisco Bay Conservation and Development Commission (BCDC) staff, depending on the project area location. Proposals were reviewed for adherence to the <u>SLR Adaptation Criteria</u> and the evaluation criteria set forth within the solicitation. This resulted in the fifth set of projects recommended for funding under this program to meet the foundational purpose of equipping California's coastal communities with robust, consistent, and comprehensive SLR adaptation plans to build resilience against the impacts of SLR and ensure that both local and regional planning and adaptation efforts are well-coordinated and consistently advanced statewide.

Track 1 (Pre-Planning, Data Collection, and Planning) Project Summaries:

9.1 Brisbane Shoreline Resilience Plan

Project Summary:

The San Mateo County Flood and Sea Level Rise Resiliency District (OneShoreline), in partnership with the City of Brisbane, proposes to develop the *Brisbane Shoreline Resilience Plan*, a single-jurisdiction Subregional Shoreline Adaptation Plan that meets the requirements of Senate Bill 272 and BCDC's <u>Regional Shoreline Adaptation Planning (RSAP) guidelines</u>. The plan will address the significant flood risks facing Brisbane's low-lying shoreline, which includes regionally critical infrastructure such as U.S. Highway 101, Caltrain tracks, and wastewater systems, along with valued community assets like Brisbane Lagoon, marina, fishing pier, and Bay Trail.

The project will include a refined vulnerability assessment based on past efforts, robust technical and community engagement, and coordination with adjacent jurisdictions, including South San Francisco, the City and County of San Francisco, and Caltrans, to promote regional alignment within the Yosemite—Visitacion Operational Landscape Unit. Nature-based solutions will be explored to restore tidal habitats and enhance shoreline protection. The final deliverable is anticipated to be a RSAP-compliant shoreline resilience plan with anticipated adoption by the Brisbane City Council and BCDC. This project will serve as a blueprint for coordinated, equitable adaptation in a future SLR "regional hotspot."

Equity and Environmental Justice Benefits:

While the City of Brisbane is not currently designated as an Environmental Justice (EJ) community under <u>CalEnviroScreen 4.0</u>, it faces a high pollution burden (85th percentile), including proximity to hazardous waste facilities (93rd percentile) and cleanup sites (90th percentile), resulting in significant groundwater contamination risks. BCDC's Community Vulnerability Map identifies parts of the city as having high social and contamination vulnerability due to factors such as a high proportion of renters, older adults, individuals with limited English proficiency, and very lowincome households.

This project is designed to center equity in both process and outcomes. An engagement consultant will partner with a community-based organization to lead inclusive outreach, including multilingual materials, focus groups, and intercept surveys of waterfront users such as anglers and marina visitors. Outreach efforts will prioritize voices historically excluded from planning, particularly those most vulnerable to coastal flooding and contamination exposure.

Additionally, the project team has expressed a commitment to engaging with California Native American tribes with ancestral ties to the project area. OneShoreline and the City will seek to formalize these relationships through a Memorandum of Understanding and offer compensation for their time and contributions. The project's equity-centered engagement will ensure that local priorities, cultural values, and community visions shape the adaptation strategies developed for Brisbane's shoreline.

About the Grantee:

The San Mateo County Flood and Sea Level Rise Resiliency District (OneShoreline) was established in 2020 as a joint powers authority to address SLR, flooding, and stormwater challenges across jurisdictional boundaries. OneShoreline leads the development and implementation of multibenefit shoreline resilience projects throughout San Mateo County and is currently coordinating similar efforts in multiple cities along the Bayshore.

With a mission to advance regional climate resilience, OneShoreline brings expertise in shoreline engineering, community engagement, and land use policy. The agency recently developed and adopted resilience planning guidance for private development and initiated work on public infrastructure resilience standards. Through this project, OneShoreline will collaborate with the City of Brisbane and a broad technical advisory committee, including Caltrans, South San Francisco, and the City and County of San Francisco, to deliver a shoreline adaptation plan that meets the RSAP's rigorous technical and equity standards. OneShoreline's proven ability to convene crossjurisdictional stakeholders and administer complex planning efforts positions it well for the successful delivery of this project.

Project Timeline:

This project will be completed over two years.

Project Financing:

Staff recommends that OPC authorize disbursement of up to \$750,000 to the San Mateo County Flood and Sea Level Rise Resiliency District (OneShoreline) for the Brisbane Shoreline Resilience Plan. This project includes leveraged non-state funds through San Mateo County Measure K, a county-wide sales tax providing funds for OneShoreline of \$200,000 for a project total of \$950,000.

9.2 Adaptation Plan and Vulnerability Assessment for Town of Tiburon

Project Summary:

The Town of Tiburon proposes completing a single-jurisdiction shoreline Vulnerability Assessment and Adaptation Plan to prepare for the impacts of SLR along its low-lying developed areas, including downtown Tiburon and the Cove. While regional efforts like Marin County's BayWAVE study have provided broad assessments, this SB 1-funded initiative will deliver Tiburon-specific analyses and adaptation strategies tailored to its unique topography, infrastructure, and community needs. The project will also advance up to three adaptation strategies to 10% design, providing a critical foundation for future implementation.

Although this is a single-jurisdiction planning effort, it builds upon ongoing regional coordination and will contribute to broader resilience goals within the county. Tiburon has actively participated in countywide SLR efforts and continues to collaborate with partners such as Marin County, the Transportation Authority of Marin (TAM), and the City of Belvedere. Through this grant, Tiburon will convene interagency focus groups to align planning with neighboring jurisdictions and ensure consistency with BCDC's Regional Shoreline Adaptation Planning (RSAP) guidelines in order to complete Tiburon's Subregional Shoreline Adaptation Plan. The project will integrate technical data, community input, and regional priorities to deliver an actionable, locally-driven adaptation plan that supports both town-specific and regional resilience outcomes.

Equity and Environmental Justice Benefits:

Although the Town of Tiburon is not designated as an environmental justice community under <u>CalEnviroScreen 4.0</u>, the town is committed to inclusive and equitable engagement throughout this planning process. Coastal flooding and storm-related impacts affect residents across income levels and housing types, including hillside homeowners, renters in low-lying neighborhoods, and frontline workers employed in downtown businesses. Emergency service access, small business continuity, and public infrastructure are all critical considerations for socially vulnerable populations.

Tiburon will lead a robust public engagement campaign with targeted outreach across the community, including in-person and virtual events, town halls, and multilingual online surveys. Special attention will be given to gathering input from groups that may face access barriers, such as older adults, renters, and those with limited digital access. This engagement will shape local priorities, inform the design of adaptation strategies, and ensure that community values and lived experiences are integrated into the planning process.

About the Grantee:

The Town of Tiburon brings a strong track record of managing complex planning initiatives and participating in regional resilience efforts. Tiburon has been a long-standing participant in Marin County's SLR coordination initiatives, including the BayWAVE vulnerability assessment and Transportation Authority of Marin's ongoing work on transportation system resilience. Town staff have contributed to monthly county-led SLR planning meetings and collaborated with regional partners to ensure alignment in adaptation priorities.

This project represents Tiburon's first standalone shoreline adaptation planning effort, allowing the Town to tailor strategies to its unique vulnerabilities while maintaining strong alignment with regional efforts. Tiburon will lead the project with support from technical consultants, contributing in-kind staffing and oversight capacity from departments experienced in infrastructure, land use, and community planning. In addition to managing the development of the adaptation plan, Tiburon will convene neighboring jurisdictions, including Marin County, TAM, and the City of Belvedere, for targeted interagency coordination, ensuring the plan both reflects local needs and complements broader regional strategies.

Project Timeline:

This project will be completed over two years.

Project Financing:

Staff recommends that OPC authorize disbursement of up to \$593,877 to the Town of Tiburon for the Adaptation Plan and Vulnerability Assessment for Town of Tiburon.

9.3 Hermosa Beach Vulnerability Assessment and SLR Adaptation Plan

Project Summary:

The City of Hermosa Beach proposes to develop a SLR Vulnerability Assessment and Adaptation Plan to prepare for increasing risks from coastal flooding, storm surges, and rising groundwater. This project will update Hermosa's 2014 vulnerability assessment and build on the City's Climate Change Adaptation and Resiliency Measures (CCARM) project, incorporating the latest climate data and planning guidance. The new assessment and plan will focus on the city's entire coastal zone, including two miles of vulnerable shoreline, and address risks to public safety, homes, infrastructure, habitats, and recreation.

The project will prioritize locally tailored solutions while actively coordinating with the Los Angeles County Regional Coastal Strategic Adaptation Plan (RCSAP), an OPC-funded SB 1 project awarded

<u>in December 2024</u>. Hermosa Beach will participate in RCSAP workshops and integrate relevant findings, while developing adaptation strategies specific to its shoreline conditions and community values. This planning effort will also establish the necessary foundation for updating the City's Local Coastal Program (LCP) and guide the design and implementation of future nature-based and structural adaptation projects.

Equity and Environmental Justice Benefits:

Hermosa Beach's population includes renters, older adults, and cost-burdened households that could be disproportionately affected by climate-related disruptions. Nearly half of Hermosa Beach residents spend over 30% of their income on rent, and the city includes mobile home communities, senior housing facilities, and multilingual households, many of which are located in or near the coastal zone.

To ensure inclusive and equitable planning, the project will feature a comprehensive community engagement strategy, including multilingual materials, webinars, workshops, and pop-up events. Outreach will be designed to incorporate lessons learned from prior engagement, such as the City's "Look Ahead Hermosa Beach" VR initiative and the CCARM project. A Technical Advisory Committee will include community-based organizations and neighboring jurisdictions to support equitable outreach and strategy development. The City also intends to consult with California Native American tribes throughout the project.

By incorporating these diverse perspectives and focusing on long-term resilience, Hermosa Beach aims to develop adaptation strategies that reflect community priorities and ensure benefits are accessible to all residents.

About the Grantee:

The City of Hermosa Beach, a compact and densely populated coastal municipality in Los Angeles County, has a strong track record of climate planning, community engagement, and interagency collaboration. Building on prior efforts, including a 2014 vulnerability assessment, the CCARM project, and a partnership with the U.S. Geological Survey to visualize SLR impacts through virtual reality, Hermosa Beach is well-positioned to lead this comprehensive planning effort.

City staff will manage the project and collaborate closely with a consultant team and a Technical Advisory Committee that includes stakeholders from Los Angeles County Beaches and Harbors, neighboring cities, and local organizations such as Heal the Bay. The City will lead outreach, maintain project alignment with the RCSAP, and coordinate with the California Coastal Commission to ensure future integration into the City's LCP. With committed leadership and

strong community interest, Hermosa Beach is prepared to deliver an actionable and community-centered adaptation plan.

Project Timeline:

This project will be completed over three years.

Project Financing:

Staff recommends that OPC authorize disbursement of up to \$590,000 to the City of Hermosa Beach for Hermosa Beach Vulnerability Assessment and SLR Adaptation Plan.

9.4 Solana Beach Sea Level Rise Adaptation Project

Project Summary:

The City of Solana Beach proposes to develop a SLR Vulnerability Assessment and Adaptation Plan to support long-term coastal resilience and comply with the planning requirements of Senate Bill 272. This SB 1-funded effort will address Phases 1 and 3 of the SB 1 Track 1 grant program, producing the City's first comprehensive vulnerability assessment of SLR risks and a community-informed adaptation plan for the entire coastal zone.

The project will be grounded in the best available science, following the 2024 State of California SLR Guidance and the California Coastal Commission's LCP guidance. Through targeted engagement with vulnerable communities, including La Colonia de Eden Gardens, low-income residents, and tribal communities with ancestral ties to the region, the project will develop equitable, site-appropriate adaptation strategies. These may include nature-based or hybrid solutions, scenario planning, and policy recommendations. This planning effort will serve as a critical step toward updating the City's LCP in coordination with Coastal Commission staff, ensuring Solana Beach is well-positioned to implement long-term resilience measures.

Equity and Environmental Justice Benefits:

Solana Beach includes neighborhoods and populations that face historic and systemic barriers to climate resilience. Approximately 20% of households qualify as very low- or extremely low-income, 42% of residents are renters, and nearly a quarter are over the age of 65. La Colonia de Eden Gardens, one of the oldest neighborhoods in the city, is recognized by the City as a historically vulnerable community, situated in a flood hazard zone and home to many long-standing residents with limited adaptive capacity.

This project will prioritize equitable engagement through a Community Engagement Plan that includes outreach to residents of La Colonia, non-English speakers, older adults, and other populations facing disproportionate SLR impacts. Workshops will be held at the La Colonia Community Center, and community surveys will be disseminated in multiple languages via the City's weekly e-newsletter and social media. The City also intends to engage tribal communities, particularly the Kumeyaay-Ipai, whose ancestral lands include the project area. This project will be a meaningful opportunity to build these developing relationships and standardize tribal input as a part of the planning process.

By assessing the direct and indirect risks to these communities and integrating community-driven feedback, the project aims to develop socially responsive adaptation strategies that enhance resilience for those most at risk.

About the Grantee:

The City of Solana Beach is a small, coastal municipality in San Diego County with a demonstrated commitment to proactive climate action. The City adopted a climate emergency resolution in 2020 and has led or participated in various types of coastal resilience efforts, including the Solana Beach Shoreline Project, a 50-year sand replenishment initiative developed with the U.S. Army Corps of Engineers. The City is currently updating its General Plan Safety Element and is committed to aligning local planning with state climate mandates.

This project builds on the City's existing work and will be led by an experienced internal project team supported by a professional planning and coastal engineering consultant. The City will manage project oversight, publish a competitive RFP, and coordinate directly with the California Coastal Commission to ensure alignment with Coastal Act requirements. While this planning effort is focused within Solana Beach's jurisdiction, the City has committed to a transparent and inclusive process and will engage with state agencies and tribal representatives to inform plan development. With a nimble staff and recent experience managing large-scale coastal projects, Solana Beach is well-positioned to deliver an actionable, community-informed SLR adaptation plan.

Project Timeline:

This project will be completed over two years.

Project Financing:

Staff recommends that OPC authorize disbursement of up to \$425,755 to the City of Solana Beach for the Solana Beach Sea Level Rise Adaptation Project. This project includes leveraged non-state funds through the City of Solana Beach's city funds of \$21,368 for a project total of \$447,123.

9.5 City of Ventura Sea Level Rise Community Co-Designed Adaptation Planning Project Summary:

The City of Ventura proposes to develop a targeted SLR Vulnerability Assessment and Adaptation Plan focused on three high-priority shoreline landscape units. This project addresses Phases 1 and 3 of the SB 1 Grant Program and will provide a detailed evaluation of local vulnerabilities and adaptation needs not addressed in the 2018 Ventura County assessment the City's current Coastal Commission-funded LCP Update, which is limited to beach management strategies.

Building on recent planning efforts and community momentum, the City will engage historically underrepresented communities in a Community Co-Design process to develop localized adaptation strategies for three landscape units along its 5.2-mile coastline. The resulting adaptation plan will identify implementation pathways and triggers and include a concept design and workplan for one priority adaptation project. This targeted, equity-centered approach will position Ventura to pursue future funding and advance long-term coastal resilience planning grounded in local values and scientific guidance.

Equity and Environmental Justice Benefits:

The City of Ventura includes multiple communities that face elevated environmental, economic, and climate-related vulnerabilities. Census tracts along the coast, including Downtown Ventura and Surfer's Point, are designated disadvantaged communities under SB 535 and rank in high percentiles for poverty, housing burden, pollution exposure, and linguistic isolation.

Neighborhoods such as San Buenaventura and Pierpont experience some of the highest diesel particulate matter exposure in the state, and rising sea levels further threaten public health, infrastructure, and community safety, particularly for the City's unhoused population living near the shoreline.

To address these inequities, the project includes a robust Community Co-Design process, with focused engagement of low-income residents, tribal representatives, Spanish-speaking communities, and other underrepresented groups to identify community preference in project outcomes. The project will use visual storytelling and small-group workshops to build understanding and ensure that adaptation strategies reflect the lived experiences and priorities of

those most affected by SLR. The final adaptation plan will prioritize equitable investments and seek to reduce climate and pollution burdens for communities historically left out of coastal planning processes.

About the Grantee:

The City of Ventura is a coastal city in Ventura County with a demonstrated commitment to inclusive, climate-informed planning. The City is currently advancing a Coastal Commission-funded LCP Update focused on beach management, and recently adopted an updated General Plan that reflects community input on climate resilience priorities.

The City has partnered with Rincon Consultants, a firm with extensive experience in SLR planning, coastal engineering, and equitable public engagement. Together, the project team will coordinate with the City's Community Subcommittee and collaborate with neighboring jurisdictions, including Ventura County, Port Hueneme, and Oxnard, as well as state and federal partners. With an engaged public, strong interagency relationships, and a qualified team, the City is well-positioned to lead this focused adaptation planning effort and prepare for future implementation.

Project Timeline:

This project will be completed over two years.

Project Financing:

Staff recommends that OPC authorize disbursement of up to \$675,400 to the City of Ventura for the City of Ventura Sea Level Rise Community Co-Designed Adaptation Planning. This project includes leveraged state funds through the LCP Local Assistance Grant Program of \$499,675 for a project total of \$1,175,075.

Project Financing:

Staff recommends that the Ocean Protection Council authorize encumbrance of up to \$3,035,032 to the following:

| Recommended SB 1 Grant Program Projects | OPC | Non-OPC | |
|---|-----------|-----------|--|
| Track 1 (Pre-Planning, Data Collection, and Planning) Projects | | | |
| 9.1 San Mateo County Flood and Sea Level Rise Resiliency District | \$750,000 | \$200,000 | |

| 9.2 Town of Tiburon | \$593,877 | |
|---------------------------|-------------|-----------|
| 9.3 City of Hermosa Beach | \$590,000 | |
| 9.4 City of Solana Beach | \$425,755 | \$21,368 |
| 9.5 City of Ventura | \$675,400 | \$499,675 |
| TOTAL | \$3,035,032 | \$721,043 |

The anticipated source of funds will be from the Budget Act of 2022, Greenhouse Gas Reduction Fund appropriation (Fiscal Year 2022/2023) to OPC for implementation of Chapter 236 of Statutes of 2021 (SB 1, Atkins). Pursuant to SB 1, funding is designated "for the purpose of making grants to local and regional governments to update local and regional land use plans to take into account sea level rise and for directly related investments to implement those plans." Consequently, all projects under the SB 1 Grant Program will focus on SLR adaptation and fall within the preplanning, planning, or implementation project phases. These projects will follow the SLR Adaptation Criteria, developed in accordance with SB 1 and in consultation with the SLR Collaborative.

Consistency with California Ocean Protection Act:

The proposed project is consistent with the Ocean Protection Act, Division 26.5 of the Public Resources Code, because it is consistent with trust-fund allowable projects, defined in Public Resources Code Section 35650(b)(2) as projects which:

- Eliminate or reduce threats to coastal and ocean ecosystems, habitats, and species.
- Allow for increased public access to, and enjoyment of, ocean and coastal resources, consistent with sustainable, long-term protection and conservation of those resources.
- Improve management, conservation, and protection of coastal waters and ocean ecosystems.
- Provide funding for adaptive management, planning coordination, monitoring, research, and other necessary activities to minimize the adverse impacts of climate change on California's ocean ecosystem.

Compliance with the California Environmental Quality Act (CEQA):

The various proposed projects under Track 1 (Pre-Planning, Data Collection, and Planning) are not 'legal projects' that trigger the California Environmental Quality Act (CEQA) pursuant to Public Resources Code section 21068 and Title 14 of the California Code of Regulations, section 15378. If a project were determined to be a 'legal project' under CEQA, the proposed projects are statutorily exempt from review under CEQA pursuant to 14 Cal. Code of Regulations section 15262 as feasibility and planning studies.