

COASTAL CONSERVANCY

Staff Recommendation  
December 19, 2019

**REDWOODS RISING – GREATER MILL CREEK WATERSHED RESTORATION**

Project No. 19-022-01  
Project Manager: Lisa Ames

**RECOMMENDED ACTION:** Authorization to disburse up to \$3,000,000 to Save the Redwoods League to restore damaged coastal redwood forests and reduce sedimentation in the Greater Mill Creek watershed of Del Norte Coast Redwood State Park, and adoption of findings under the California Environmental Quality Act.

**LOCATION:** Greater Mill Creek Watershed, 6 miles southeast of Crescent City in unincorporated Del Norte County.

**PROGRAM CATEGORY:** Resource Enhancement

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EXHIBITS

- Exhibit 1: [Project Location and Site Maps](#)
  - Exhibit 2: [Photos](#)
  - Exhibit 3: [CEQA](#)
  - Exhibit 4: [Project Letters](#)
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**RESOLUTION AND FINDINGS:**

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31251 *et seq* of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed three million dollars (\$3,000,000) to Save the Redwoods League (SRL) to restore damaged coastal redwood forests and reduce sedimentation in the Greater Mill Creek watershed of Del Norte Coast Redwood State Park in Del Norte 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 employed in carrying out the project.
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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.”

Staff further recommends that the Conservancy adopt the following findings:

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

1. The proposed authorization is consistent with Chapter 6 of Division 21 of the Public Resources Code, regarding the enhancement of regionally important salmonid habitat.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. Save the Redwoods League is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code, and whose purposes are consistent with Division 21 of the Public Resources Code.
4. The Conservancy has independently reviewed and considered the “Final Initial Study/Negative Declaration and Environmental Assessment for the Greater Mill Creek Ecosystem Restoration Project” adopted by the California State Parks on November 1, 2019 pursuant to the California Environmental Quality Act (“CEQA”) and attached to the accompanying staff recommendation as Exhibit 3. The Conservancy finds that there is no substantial evidence based on the record that the project may have a significant effect on the environment, as defined in 14 Cal. Code Regulations Section 15382.”

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**PROJECT SUMMARY:**

Staff recommends the Conservancy authorize the disbursement of up to \$3,000,000 to Save the Redwoods League (SRL) to restore damaged forests and reduce sedimentation throughout the Greater Mill Creek watershed located in Del Norte Coast Redwood State Park in Del Norte County (see Exhibit 1: Project Location and Site Maps). Through tree thinning and road rehabilitation, the proposed project will enable SRL and its partners to accelerate the development of old-growth forest conditions and associated biodiversity, reduce catastrophic fire risk, and improve the biological health of one of the most productive coho salmon fisheries in the Pacific Northwest.

The tallest and some of the oldest trees in the world, coastal redwoods grow in a fragmented band from the coast of central California to southern Oregon. Logging and clearcutting that began in the late 1800s destroyed coastal redwood forests on an industrial scale for many

decades. These substantial timber harvests and the related road construction conducted over the landscape increased erosion and the delivery of sediment to stream channels such as Mill Creek. Sediment delivery to stream channels from roads and road networks has been extensively documented and is recognized as a significant impediment to the health of salmonid habitat. In addition to the detrimental impacts of logging to the water courses, forest regeneration after clearcutting created unnaturally dense forests with high competition among trees for light and water, reduced genetic diversity, impaired ability to store carbon or provide ample habitat for native species, and increased catastrophic fire risk. (See Exhibit 2 for photographic examples of dense forests and road failure on the site.)

In 2002, the Conservancy helped fund SRL's acquisition of the Mill Creek property, a 25,000-acre parcel that had been extensively logged since the 1940s. SRL transferred the Mill Creek Property to California State Parks (State Parks), and State Parks added it to the adjacent Del Norte Coast Redwood State Park, one of four redwood park preserves that make up the Redwood National and State Parks (RNSP), which are cooperatively managed by the National Park Service (NPS) and State Parks. The Mill Creek acquisition helped spur recognition that protection of coastal redwoods necessitates not only conserving pristine stands, but also restoring badly damaged landscapes that require watershed-scale restoration and active redwood forest management.

Following preparation of a Conservancy-funded Interim Management Plan (IMP) for the property and implementation of the salmonid habitat restoration projects recommended by the IMP, State Parks completed a comprehensive Local Watershed Management Plan (LWMP) for the Mill Creek Property and Watershed in 2011. The LWMP included a road inventory and assessment report that identified high to low risk road failure sites and potential sediment delivery threats throughout the watershed. (302 miles of road, 1,457 road-stream crossings, 981 landings, 807 mass wasting sites and 443 road fills were classified.) Also, the LWMP included a vegetation management plan that recommended immediate forest stand treatments to prevent stagnation and the loss of whole stands to windthrow. One of the LWMP's conclusions was that a lack of management would delay the development of late-successional conditions by decades. Studies have shown that long maturing natural forests will eventually store typically 40 times more carbon than a plantation harvested once a decade.

Announced in 2018, the Redwoods Rising Project is a landscape-scale approach to forest restoration across multiple watersheds through a collaborative and integrative program designed to accelerate the development of late seral stage forest conditions in previously logged forests and enhance salmonid habitat. Redwoods Rising is a formal partnership among SRL, NPS and State Parks to restore up to 80,000 acres of redwood ecosystems in RNSP over the coming decades. As a component of Redwoods Rising, the Mill Creek project will specifically improve road access and conduct thinning treatments throughout the greater Mill Creek watershed:

Road Access: The project will improve access to almost 25,000 acres of degraded young forest through reestablishment of abandoned and long-unmaintained haul roads, skid trails, and landings and removal of vegetation to provide access for forest and aquatic restoration

activities and proper drainage in project areas. Treatment will include removal of fill from several hundred eroded legacy stream crossings and removal of drainage structures to improve streamflow and fish passage. (See Exhibit 2 for examples of before and after photos of stream treatments.) Other road access activities include installation of temporary bridges and brushing. After forest treatments (described below) are completed, some roads will be removed and revegetated using leveraged funds, while administrative roads will be left for long-term use.

Thinning Treatments: Forest thinning methods will be implemented to reduce stand density, redistribute growth among the remaining trees, and enhance forest health. Different thinning methods will be identified in the field, based on site-specific conditions to further promote landscape-scale heterogeneity and achieve desired future conditions related to species composition and tree density. The thinning method will vary according to context, taking into consideration such factors as the need to shift species composition in areas altered by previous logging activities and the need to maintain slope stability where thinning operations occur on steep slopes. In many areas, biomass will be removed from thinning sites to reduce fire hazard, encourage understory development, increase carbon sequestration benefit, and leverage program income.

**Site Description:** Located approximately 6 miles southeast of Crescent City, the Greater Mill Creek watershed is comprised of both Mill Creek and Rock Creek watersheds and encompasses approximately 25,000 acres within Del Norte Coast Redwoods State Park. The watershed adjoins Jedidiah Smith Redwoods State Park to the north, Redwood National Park to the northwest, Six Rivers National Recreation Area to the east and industrial timber lands to the south. (See Exhibit 1 site maps for locations of roads and thinning units.) The approximate northern limits of the California Coast Ranges and the western Klamath Mountains meet at the Greater Mill Creek watershed to form a chain of northwest trending valleys and ridges. Ridges are generally broad and gently sloping and their crests generally increase in elevation from west to east. Elevations range from approximately 52 ft to 2,247 ft. Deeply incised tributary streams contribute flow to the West Branch and East Fork of Mill Creek, both of which have broad, flat valleys, and to Rock Creek which flows through a narrow valley for most of its length. Annual precipitation generally ranges from 60-150 inches and air temperatures range from 41-67°F.

Fire, edaphic (soil) conditions, moisture gradients and wind were the major variables influencing vegetation composition before the property was first used for logging. Most of the Mill Creek drainage was forested except for two small prairies. Although the park is home to some old-growth coastal redwoods, nearly the entire watershed is comprised of second-growth redwoods and Douglas-fir, seeded at extremely high densities in anticipation of future timber management. The mixed understory includes tanoak, madrone, red alder, big leaf maple, and California bay. Ground cover is dense, with a wide range of species. The landscape is diverse and supports essential habitat for wildlife, including threatened, endangered, and sensitive species, such as foothill yellow-legged frog, Humboldt marten, marbled murrelet, northern spotted owl, willow flycatcher, steelhead trout, and coho salmon. The Greater Mill Creek watershed contains one of the most productive coho salmon fisheries in the Pacific Northwest.

This watershed suffers from a legacy of decades of logging and was protected with critical support from the Coastal Conservancy and others in 2002. While SRL, State Parks, and other partners have thinned more than 5,000 acres of forest, retired 70 miles of roads, removed 344 stream crossings, and installed 90 in-stream log structures in this watershed since 2002, much work is left to do. The Redwoods Rising Project-Greater Mill Creek watershed restoration will build upon this success and accelerate recovery toward late-seral, healthy forest conditions for decades to come.

**Grantee Qualifications:** Since 1918, Save the Redwoods League has been dedicated to the long-term preservation of a healthy redwood ecosystem through redwood restoration and stewardship and the support of scientific research to expand knowledge of the forest’s ecosystem. Over the past 101 years, SRL has protected more than 200,000 acres of land (worth more than \$4 billion in today’s dollars) and helped create 66 parks and reserves. SRL has the fiscal capacity and expertise to conduct the proposed project with an annual operating budget of \$32,562,363 (FY2019-20), including a permanent stewardship endowment.

The Conservancy and SRL have collaborated on a number of north coast projects over the last 20 years including acquisition of the 25,000-acre Mill Creek property, (the site of this restoration project), in Del Norte County, and acquisitions at Humboldt Lagoons State Park, Montgomery Woods State Park in the upper Big River watershed, and the Shady Dell property in Mendocino. SRL provided interim funding for both the Jenner Headlands acquisition and the Stewarts Point Ranch acquisition in Sonoma County when State funding was frozen. Recently, SRL and the Conservancy completed a segment of the coastal trail on the Shady Dell property.

**Project History:** In 1994, NPS and California State Parks came together to form the RNSP partnership, beginning a long-term commitment to cooperatively manage the agencies’ four adjacent and connected redwood parks: Redwood National Park, Jedediah Smith Redwoods State Park, Del Norte Coast Redwoods State Park, and Prairie Creek Redwoods State Park. This partnership also advanced the use of innovative, landscape-scale restoration practices that had been tested in early restoration efforts and has continued restoring the forest in recent decades.

In 2002, the Conservancy helped acquire the 25,000-acre Mill Creek property for addition to Del Norte Coast Redwood State Park. The Conservancy also funded an Interim Management Plan for the property and salmonid habitat restoration projects recommended by the Plan. In 2011, State Parks completed a comprehensive Local Watershed Management Plan (LWMP) for the Mill Creek Property and Watershed. In April 2018, Redwoods Rising was publicly announced, with partnership design, planning, and permitting underway since then, and implementation expected to begin this winter.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$3,000,000</b>
<b>CAL FIRE (secured)</b>	<b>\$7,000,000</b>

<b>SRL Philanthropy and Timber Revenue (partially secured)</b>	<b>\$18,046,100</b>
<b>Project Total</b>	<b>\$28,046,100</b>

Conservancy funds for this project are expected to come from an appropriation to the Conservancy from the California Drought, Water, Climate, Coastal Protection, and Outdoors Access for All Act of 2018 (Proposition 68, California Public Resources Code Sections 80000-80173). Pursuant to Section 80120(e), the Conservancy may provide grants for the protection, restoration and improvement of coastal forest watersheds including managed forest lands, forest reserve areas, redwood forests and other forest types. This project is an eligible project type pursuant to Section 80120(e) because it will improve water quality, increase coastal watershed storage capacity, reduce fire risk, provide habitat for fish and wildlife and improve coastal forest health within the Del Norte Coast Redwood State Park.

SRL was awarded a CALFIRE Greenhouse Gas Reduction Fund (GGRF) grant of \$7,000,000 for this project. GGRF funds support: State Parks staff costs associated with thinning and road removal; contract labor for road removal; contractor costs for oversight of road removal and thinning; and project supplies.

To date, SRL has secured a grant of \$1,000,000 from the S. D. Bechtel, Jr. Foundation for governance, compliance, and planning activities, as well as unrestricted project support totaling \$2,100,000 from two individual donors. As part of its 100<sup>th</sup> anniversary celebration, Save the Redwoods League will announce a comprehensive philanthropic campaign in January 2020, with Redwoods Rising planned as a major highlight of this campaign. Additionally, an estimated \$13,000,000 is expected to be generated during the performance period through sale of logs to local mills, the revenue from which will be cycled back into restoration operations. Public and private funds will continue to be sought throughout the life of the project.

In-kind services total \$3,866,629. This includes:

- \$1,118,208 in SRL staff time on the Redwoods Rising Project;
- \$287,040 in NPS staff time for thinning work;
- \$924,927 in State Parks staff time for thinning work;
- \$437,463 in NPS staff time for road access work;
- \$993,991 in State Parks staff time for road access work; and
- \$105,000 in SRL staff travel costs.

**CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:**

The proposed project is undertaken pursuant to Chapter 6 of Division 21 of the Public Resources Code, as follows:

Pursuant to Pursuant to §31251, the Conservancy may award grants to local public agencies and nonprofit organizations for the purpose of enhancement of coastal resources which, because of human-induced events, or incompatible land uses, have suffered loss of natural and scenic values. Consistent with this section, the project will aid in the recovery of salmon and steelhead populations, which are coastal resources that have been adversely impacted by habitat degradation caused by past forest land use practices. Thus, this grant will be used for corrective measures that will enhance the natural character of the area, consistent with Section 31251.

Pursuant to §31251.2, the Conservancy may, in order to enhance the natural or scenic character of coastal resources within the coastal zone, undertake a project that enhances a watershed resource that is partly outside the coastal zone. The project is located outside the coastal zone but it will protect and enhance habitat of anadromous salmon and steelhead, which are a watershed resource partly outside the coastal zone. These marine fisheries are in the Mill Creek watershed, a significant tributary of the ocean flowing Smith River. Enhancing habitat for these fisheries outside the coastal zone will aid in their recovery, thereby enhancing the natural character of coastal resources. Thus the proposed project is consistent with §31251.2.

Pursuant to §31252, all areas proposed for resource enhancement by a state agency, local public agency, or nonprofit organization shall be identified in a certified local coastal plan or program as requiring public action to resolve existing or potential resource protection problems. Since the LCP cites the importance of coastal marine fisheries and the need to protect their freshwater aquatic habitat through appropriate land management practices, the proposed project is consistent with §31252.

Pursuant to §31253, the Conservancy may provide up to the total cost of any coastal resource enhancement project, including the state or local share of federally supported project. The proposed authorization is for approximately 10% of the total project cost and is therefore consistent with §31253.

**CONSISTENCY WITH CONSERVANCY'S [2018-2022 STRATEGIC PLAN](#)**

**GOAL(S) & OBJECTIVE(S):**

Consistent with Goal 6, Objective B, the proposed project will restore 1000 acres of coastal forest habitat in the North Coast.

Consistent with Goal 6, Objective E, the proposed project will implement one project to restore fish habitat by improving fish passage, ensuring sufficient instream flow, and providing instream habitat and favorable water conditions.

Consistent with Goal 15, Objective B, the project represents participation in a regional collaborative that furthers Conservancy goals and objectives and supports the work of partner organizations.

**CONSISTENCY WITH CONSERVANCY'S  
PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

**Required Criteria**

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Promotion and implementation of state plans and policies:** The proposed project would serve to promote and implement several state plans, including:
  - California @ 50 Million: The Environmental Goals and Policy Report: This Project advances the goal to "steward and protect natural and working landscapes," by supporting landscape-scale approaches that provide multiple benefits, streamlining land management, building resilience into natural systems, and using biomass to support forest health.
  - CA Climate Adaptation Strategy/Safeguarding California Reducing Climate Risk Plan: The Project advances the "biodiversity and habitat" goals by improving habitat connectivity and protecting climate refugia and the "forestry" goals by enhancing coordinated efforts to reduce wildfire risks and implementing cost-effective watershed restoration.
  - CA Water Action Plan, Action #4, Restore forest health through ecologically sound forest management. The Integrated Watershed Management Plan that applies to the project area is The North Coast Integrated Regional Water Management Plan. The project will directly implement two objectives of this plan: Goal 3, Objective 5 – conserve, enhance and restore watersheds' aquatic ecosystems including functions, habitats and elements that support biodiversity and; Goal 3, Objective 6 – enhance salmonid populations by conserving, enhancing and restoring required habitats and watershed processes.
  - CA Wildlife Action Plan: The Project benefits coho salmon, steelhead trout, foothill yellow-legged frog, northern spotted owl, willow flycatcher, and Humboldt marten, all of which are listed as "focal species of conservation strategies developed for conservation targets in the North Coast and Klamath Province."
  - California Essential Habitat Connectivity Strategy for Conserving a Connected California: The Project will restore ecosystem function, including anadromous fish habitat connectivity, and sustain and enhance high integrity forest habitat within the



North Coast Ecoregion, which the report identifies as a primary focus for this planning area.

- The Project would serve to promote and implement the following State and Federal Species Recovery Plans: Recovery Strategy for California Coho Salmon (CDFW, 2004); Southern Oregon Northern California Coho Salmon Recovery Plan (NOAA, 2014); Steelhead Restoration and Management Plan for California (CDFW, 1996); Final Multispecies Recovery Plan (NOAA, 2016); Revised Recovery Plan for Northern Spotted Owl (USFWS, 2011); Recovery Plan for the Marbled Murrelet: Washington, Oregon, and California Populations (USFWS, 1997); and A Conservation Assessment and Strategy for the Humboldt Marten in California and Oregon (USFS, 2019).
4. **Support of the public:** The project has broad support as demonstrated by the letters attached as Exhibit 4.
  5. **Location:** The proposed project will be conducted in the Mill Creek watershed, a tributary of the coastal draining Smith River of northwestern Del Norte County and will benefit anadromous fish spawning habitat.
  6. **Need:** Conservancy funding will leverage CALFIRE's grant which supports the project's complementary road removal and thinning activities. Without Conservancy support, implementation would likely be delayed and/or the scope of the pilot implementation efforts reduced. Delays and scope reduction increase the likelihood that roads will continue to erode into waterways, culverts and bridges will continue to fail and overly dense, unhealthy forests increase the risk of catastrophic fires and their associated human and wildlife health risks.
  7. **Greater-than-local interest:** The Redwoods Rising Project is entirely located on RNSP lands, which are jointly managed by NPS and California State Parks and open to visitors from around the world. These parks are home to nearly half of the world's protected old-growth redwoods and provide critical habitat for threatened, endangered, and special status species, including coho salmon, steelhead trout, foothill yellow-legged frog, marbled murrelet, northern spotted owl, willow flycatcher, and Humboldt marten, among others. By modeling collaborative, multijurisdictional, landscape-scale restoration within an iconic, UNESCO world heritage site, the project can accelerate restoration outcomes and demonstrate how to foster healthy forests in a region famed for its natural resources and spectacular beauty.
  8. **Sea level rise vulnerability:** Because of the high elevations of the watershed, the project will not be affected by projected sea level rise and will provide for the migration and adaptation of downstream wetland, floodplain and tideland habitats.

#### **Additional Criteria**

9. **Leverage:** See the "Project Financing" section above.
10. **Innovation:** The Redwoods Rising Project is innovative because it advances public-private partnerships and multi-jurisdictional collaboration to accelerate restoration benefits across

a broad landscape over the coming decades. By leveraging the collective strengths of this innovative partnership, the Project will result in healthier and more resilient forests, the removal of sediment sources that threaten aquatic ecosystems, and the enhancement of habitat for imperiled terrestrial, avian, and aquatic species across RNSP.

11. **Readiness:** SRL has commenced the Redwoods Rising Project and is poised to accelerate restoration work when funding is available.
12. **Realization of prior Conservancy goals:** “See “Project History” above.”
13. **Cooperation:** Redwoods Rising core partners include Save the Redwoods League, National Park Service, and State Parks, which have executed a 20-year Memorandum of Understanding. NPS and SRL are currently executing a Cooperative Agreement for Redwoods Rising. The Redwoods Rising partnership has also invited local tribes to participate as core partners and hopes to secure tribal involvement in the coming years. Other supporters include: Humboldt State University, which administers the Apprenticeship Program; CALFIRE Greenhouse Gas Reduction Fund, which is providing public funds; S. D. Bechtel, Jr. Foundation, which has provided philanthropic support; two individual donors, who have provided major gifts to support the project; and thousands of SRL members.
14. **Vulnerability from climate change impacts other than sea level rise:** Climate change is expected to lead to higher temperatures and drier winters in California, making forestlands more vulnerable to wildfire. Through thinning treatments, Redwoods Rising will drastically reduce the risk of catastrophic wildfire by returning the forest to more natural, less dense conditions, thereby helping to prevent the massive carbon releases that occur with wildfires. The recovering forest will provide connectivity between the climate refugia found within the parks’ old-growth stands. Moreover, match-funded work to plant conifers such as redwood or spruce along riparian corridors where conifers had been replaced with alder will provide better shading and cooling functions for anadromous species as water temperatures continue to rise.
15. **Minimization of greenhouse gas emissions:** Acre for acre, old-growth coast redwoods sequester and store more carbon than any other terrestrial ecosystem on Earth. This Project is specifically designed to support the vigor of the healthiest and largest redwoods, while thinning smaller, second-growth redwoods, Douglas-fir, and other young trees competing for nutrients, light, and water. Through long-term implementation of the Redwoods Rising restoration vision, the partnership expects to increase the capacity of remaining old-growth redwoods to sequester and store carbon while improving forest health and biodiversity in logging-damaged areas, setting these young trees on a course to become the late-seral redwoods of the future. No plans to seek carbon credits for the Project are in place.

#### **CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:**

The entire property falls within a timber preservation zone (TPZ) in the County of Del Norte’s certified Local Coastal Program (LCP). Timber production related industries are of primary importance within TPZs. However, several other uses, such as wildlife protection and outdoor

recreation, are authorized as secondary uses within TPZs. In the absence of a proposal to retain the property solely for timber production and related industries, the LCP provides numerous secondary uses and associated policies that ensure project consistency with the LCP. The certified Del Norte County Local Coastal Program states:

“Riparian vegetation shall be maintained along streams, creeks, and sloughs and other water courses within the Coastal Zone for their qualities as wildlife habitat, stream buffer zones, and bank stabilization... The County should seek funds from the Coastal Conservancy to reestablish riparian vegetation in selected stream corridors.” (LCP p. 67)

The LCP acknowledges that “. . . the Klamath and Smith River estuaries are vital to anadromous fisheries... The maintenance of water quality is also important to the continued productivity of estuary ecosystems...” (LCP p. 63) [Since protection of water quality and estuarine health is contingent on protection of upstream sediment sources, the proposed project is consistent with this guiding principle of the LCP.]

As a general policy, the County of Del Norte “. . . recognizes the economic and biologic significance of maintaining and where possible enhancing marine resources, coastal waters and sensitive coastal habitats.” General policies designed to achieve these important goals include, but are not limited to: 1) Maintain, and where feasible enhance the existing quality of all marine and water resources; 2) Encourage programs (*e.g.*, habitat rehabilitation) designed to improve the quality of coastal fisheries and other marine resources; 3) Maintain all surface and subsurface waters at the highest level of quality to ensure the safety of public health and the biological productivity of coastal waters; 4) Avoid the impairment of water quality or adversely affect the biological productivity of coastal waters from agricultural waste; and 5) Protect environmentally sensitive habitat areas against any significant disruption of habitat values. (LCP pp. 57-58)

The LCP designates the following criteria for special attention to the protection of riparian vegetation systems: 1) The protection of biologically productive areas important to the maintenance of sport and commercial fisheries; 2) Habitat areas vital to the maintenance and enhancement of rare and/or endangered species; 3) Fragile communities requiring protective management to insure their biological productivity, species diversity, and/or continued maintenance, and areas of outstanding scientific or educational value that require protection to insure their viability for future inquiry and study. (LCP pp. 47-48)

“Commercial and sport fisheries are important to the economy of Del Norte County.” (p. 41)

**CEQA COMPLIANCE:**

Staff has independently evaluated the “Final Initial Study/Negative Declaration and Environmental Assessment for the Greater Mill Creek Ecosystem Restoration Project” adopted by California State Parks on November 1, 2019, and concurs that there is no substantial evidence that the proposed project will have a significant effect on the environment. Less than significant impacts would be temporary in duration. The proposed action is anticipated to result in long-term benefits to aesthetics, biological resources, greenhouse gas emissions, hydrology

and water quality, and reduced wildfire risk in the project area. Staff therefore recommends that the Conservancy find that there is no substantial evidence that the project will have a significant effect on the environment as that term is defined by 14 Cal. Code Regs. §15382.

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