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COASTAL CONSERVANCY

Staff Recommendation  
May 05, 2020

**MILL BEND ACQUISITION AND  
INTEGRATED RESOURCE MANAGEMENT PLANNING**

Project No. 19-012-01  
Project Manager: Lisa Ames

**RECOMMENDED ACTION:** Authorization to disburse up to \$1,300,000 to the Redwood Coast Land Conservancy for the acquisition of the 113-acre Mill Bend property, and preparation of an integrated resource management plan for the property, located at the mouth of the Gualala River in Sonoma and Mendocino counties.

**LOCATION:** Gualala River, Sonoma County and Mendocino County

**PROGRAM CATEGORY:** Integrated Coastal and Marine Resource Protection

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EXHIBITS

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

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Section 31220 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed one million three hundred thousand dollars (\$1,300,000) to Redwood Coast Land Conservancy (“RCLC”) for the acquisition of the 113-acre Mill Bend property (consisting of Sonoma County Assessor Parcel No. 122-020-004 and Mendocino County Assessor Parcel Nos. 145, 261-08, 145-290-05 and 145-290-08), preparation of an integrated resource management plan for the property, and minor land clean-up actions.

This authorization is subject to the following conditions:

1. Prior to the disbursement of funds for the acquisition, the grantee shall submit for the review and approval of the Executive Officer of the Conservancy (Executive Officer):

- a. All relevant acquisition documents for the acquisition including, without limitation, the appraisal, purchase and sale agreement, deed, escrow instructions, environmental or hazardous materials assessment, and title report;
  - b. A baseline conditions report;
  - c. Evidence that sufficient funds are available to complete the acquisition; and
  - d. A plan for acknowledgement of the Conservancy.
2. The grantee shall pay no more than fair market value for the property as established in an appraisal approved by the Executive Officer.
  3. The property acquired under this authorization shall be managed and operated for public access and recreation, open space, habitat conservation, and environmental education and research related to conservation and protection of the natural resources of the property. The property shall be permanently dedicated to those purposes by an appropriate instrument approved by the Executive Officer.
  4. Prior to commencement of the planning project, the grantee shall submit for the review and written approval of the Executive Officer a detailed work program, schedule, and budget, and names and qualifications of any contractors to be retained in carrying out the project.
  5. In addition, to the extent appropriate, the grantee shall incorporate the guidelines of the Conservancy's 'Standards and Recommendations for Accessway Location and Development'."

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 5.5 of Division 21 of the Public Resources Code, regarding integrated coastal and marine resources protection.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Redwood Coast Land Conservancy is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code."

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**PROJECT SUMMARY:**

Staff recommends the Conservancy authorize the disbursement of up to \$1,300,000 to the Redwood Coast Land Conservancy to acquire the 113-acre Mill Bend property located at the mouth of the Gualala River in coastal northern Sonoma and southern Mendocino counties, perform minor clean-up actions, and to prepare an integrated resource management plan for the property. The plan will address site management to protect, restore and enhance the natural resources and to provide public access and recreation opportunities, potentially

including trails, an environmental education and research center, and a one mile stretch of the California Coastal Trail connecting the Gualala Bluff trail in Mendocino County and the Gualala Point Regional Park in Sonoma County. The proposed disbursement includes 1) \$980,000 in grant funds awarded to the Conservancy by the U.S. Fish and Wildlife Service (USFWS) from the National Coastal Wetland Conservation (NCWC) Grant Program and 2) \$320,000 of Conservancy funds.

The Mill Bend property is bisected by Highway 1 immediately south of the unincorporated town of Gualala (Exhibit 1) and is the first sight visitors encounter when entering Mendocino County from the south. The property is comprised of 4 parcels: Sonoma County Assessor Parcel Number (APN) 122-020-004 and Mendocino County APNs 145-261-08, 145-290-05 & 145-261-08. The property contains 65 acres of estuarine and riverine wetlands and 48 acres of uplands; a portion of the wetlands are degraded, and invasive non-native grasslands dominate the upland areas of the property. Running through the property, the Gualala River drains 298 square miles and along with adjacent lands, provides critical habitat for numerous threatened and endangered species including steelhead trout, coho salmon, red-legged frog, tri-colored blackbird, the plant Roderick's Fritillary and regionally sensitive plant and animal species including northern spotted owls, marbled murrelets, bank swallows, a pair of bald eagles, river otters, pacific lamprey and numerous coastal dependent and migratory birds. (See photos in Exhibit 2.) The uplands include a former timber mill site, a historical pioneer cemetery and two small residential buildings. Asphalt, cement and other debris from the former timber mill site remain on the property.

The Gualala River is designated as an impaired water body by the North Coast Regional Water Quality Control Board due to fine sediment load, high water temperature and lack of habitat complexity caused by legacy and ongoing timber practices and land conversions to ranches and vineyards. These practices impede the healthy functioning of biological communities throughout the Gualala watershed and severely degrade spawning and rearing habitat for salmonids. Coho salmon are nearly extirpated from this former fisheries resource. The remaining anadromous salmonid populations in the Gualala watershed have developed adaptive strategies to cope with upstream disturbances by utilizing the Gualala estuary and lower river for a longer period of the year than they would in a healthy watershed, making these areas (in which the Mill Bend property is located) critical for long term conservation and restoration as proposed by this project.

In 2017, the Mill Bend property entered the market for the first time in nearly 70 years. Based on the site's zoning, the landowners had developed a conceptual master plan in 2008 with an aggressive development strategy for the property's uplands that included a total of 171 residential lots and a 46,900 square foot hotel facility; however as noted in a 2018 appraisal, constraints on the property (including location within an environmentally sensitive habitat area, coastal zone restrictions and a current moratorium on new water hook-ups) indicate that the property could most likely be redeveloped with two estate-quality residences at the current time, while retaining the potential for future high-density development.

The Redwood Coast Land Conservancy (RCLC) in collaboration with the community and numerous local and regional groups acted on the opportunity to protect this keystone property

by identifying an interim conservation buyer (The Allemall Foundation) to acquire and hold the Mill Bend property while RCLC raised funds for acquisition and long-term stewardship. Over the past several months, RCLC has conducted due diligence, received an acquisition grant from the California Natural Resources Agency's Environmental Enhancement and Mitigation Program, and raised a significant amount of stewardship funds in anticipation of managing the Mill Bend site in perpetuity. Working closely with RCLC and the Mendocino Land Trust, Conservancy staff applied for a \$1,000,000 NCWC grant from the USFWS in June 2019 for the Mill Bend acquisition. The Conservancy was awarded the NCWC funds in March 2020; of the total award, \$980,000 will be disbursed to RCLC for project implementation, \$20,000 will cover Conservancy staff costs related to the project.

Specifically, the proposed project entails acquisition of the 113-acre property, minor clean-up actions, and development of an integrated resource management plan. The clean-up actions will consist of debris removal that does not require disturbance of the ground. Removal of asphalt, cement and other materials involving ground disturbance to remove will be addressed in the resource management plan. The plan will include recommendations for future wetland restoration to support more robust salmonid populations and invasive plant removal to restore native habitats. The management plan will also include planning for a future environmental education and research facility using the two existing small residential structures and resource sensitive public access trails for fishing and wildlife-oriented recreation, which will also serve visitors to the adjacent County Park and campground. Additionally, future trails on the property are expected to become part of the California Coastal Trail, and will connect to the Gualala Bluff Trail, an existing segment of coastal trail constructed and maintained by RCLC. RCLC expects to use the property for several outreach events per year such as kayak tours, birdwatching, guided wetland walks and park ranger-guided talks and hikes.

**Site Description:** The 113-acre project site is located at the mouth and 1.5-mile lower reach of the Gualala River, an important anadromous salmonid stream that forms the boundary between Sonoma and Mendocino counties. The subject property is comprised of four legal parcels: two of the parcels total 40.6 acres, consist of estuarine and palustrine wetlands and lie west of Highway 1 in Mendocino County; the third parcel contains 13.4 acres of estuarine and palustrine wetlands on the south side of the river in Sonoma County and also lies west of Highway 1; and the fourth parcel totaling 59 acres east of Highway 1 in Mendocino County contains upland, forest and riverine habitats (see Exhibit 1). The 59-acre parcel includes two small single-family residences currently used by the non-profit Gualala River Watershed Council for research and data collection activities related to the protection and restoration of the Gualala River. There is also a one-acre inholding within the 59-acre parcel consisting of a historical cemetery from the 1800's. The cemetery is on a separate legal parcel and is not part of this acquisition, however the acquisition is expected to provide access to the cemetery site.

The Mill Bend wetlands (including seasonally flooded alder and willow groves, coastal scrub, emergent freshwater and tidal marsh) contains critical habitat for threatened and endangered species including steelhead trout, coho salmon, red-legged frog, tri-colored blackbird, the plant Roderick's Fritillary and for numerous regionally sensitive plant and animal species. Many species sensitive to disturbance inhabit and/or utilize the Gualala watershed and its estuary,

including northern spotted owls, marbled murrelets, bank swallows, a pair of bald eagles, river otters, pacific lamprey and numerous coastal dependent and migratory birds.

The uplands (redwood forest, bishop pine forest, and grassland) throughout the property contain non-native, invasive plant species. Because the Mill Bend property is not actively managed, off-road vehicles drive onto the estuarine beach west of Highway 1, and there is an occasional homeless encampment in the scrub wetlands until the local authorities are requested by nearby residents to remove it.

The 59-acre parcel contains remnants of an old lumber mill consisting of surface debris and broken asphalt and cement; the asphalt and cement, which is nonhazardous, will be removed after the site is acquired.

In addition, as part of the due diligence, RCLC conducted a two-phased environmental assessment of the site that identified an underground gasoline storage tank in the old lumber yard. As a condition to acquisition by the conservation buyer, the former owner removed the tank in 2019 and received a clean closure letter from the Regional Water Quality Control Board.

**Grantee Qualifications:** The Redwood Coast Land Conservancy (RCLC) is the local land trust dedicated to conserving open spaces and the natural environment and expanding public access in southern Mendocino County and northern Sonoma County. Founded in 1992, RCLC holds and manages local conservation easements and land in fee to carry out its mission. RCLC has completed several acquisition and/or coastal trail implementation projects with community input and Conservancy support, including Hearn Gulch, Cooks Beach and the Gualala Bluff Trail (all part of the California Coastal Trail). Future Mill Bend trails will connect with the Gualala Bluff Trail.

**Project History:** Historically, the Mill Bend property has been used for a variety of timber-related uses, including a mill site by numerous timber outfits, dating back to the late 1800's. The area and the mill flourished into the early 1960's, when the mill was dismantled and moved further upriver. (See photos in Exhibit 2)

In 1993, the US Environmental Protection Agency (USEPA) listed the Gualala River on its federal Clean Water Act §303(d) list of impaired water bodies due to declines in anadromous salmonids from excessive sedimentation. The §303(d) listing was updated in 2003, and water temperatures in the basin are now considered impaired as well. Because of the EPA listing, its natural wetland and riverine resources and its location as a gateway to Mendocino County to the north, Sonoma County to the south, and the Gualala River to the east, environmental and recreational groups have been interested in the Mill Bend property for decades.

In 1996, the Conservancy funded the *Gualala River Watershed Literature Search and Assimilation*, a report that provided agencies and individuals with the first compilation of historical information and scientific data relating to the Gualala river watershed. The report identified data gaps and the need for a comprehensive watershed assessment and restoration plan. In 2001, the Conservancy funded the *Lower Gualala River and Estuary Assessment and Enhancement Plan* to complement ongoing assessment efforts in the upper watershed.

In late 2008, the prior property owners, Gualala Redwoods Inc., (GRI) commissioned a conceptual master plan with a development strategy for the property's uplands that outlined

the market demand, risks and suggestions for a proposed Gualala Village - “a pedestrian oriented coastal village” that included a total of 171 residential lots on 23 acres, a 46,900 square foot hotel facility on 4.6 acres and nearly 75 acres of open space and right of-ways valued at \$15 million.

The subject property along with thousands of acres of timberland, had been in GRI ownership since it was acquired in 1948. In 2015, GRI sold roughly 29,000 acres - the core timberland, to the Burch Family operating as Gualala Redwood Timber Co., but retained the 113 acre Mill Bend property along with several other tracts in and around the community of Gualala to realize its “Gualala Village” development strategy. However, despite the property being zoned for high-density, mixed residential and commercial uses, constraints include location within an environmentally sensitive habitat area, coastal zone restrictions and a current moratorium on new water hook-ups. A recent appraisal (2018) concluded that the property could likely be redeveloped with two estate-quality residences at the current time but retains the potential for future high-density development.

GRI placed the property on the market in 2017, for the first time in nearly 70 years. Results from an ensuing community forum showed strong preference for protecting the property from commercial development, improving public access to the river and restoring the natural habitat. Based on these results, the Mill Bend Coalition was formed with members of RCLC and Friends of Gualala River (FoGR). The coalition began a series of activities, meeting with diverse stakeholders and potential funders, securing endorsements, and gathering information to help negotiate a fair price for the property. This effort was rewarded in September 2019 when a conservation buyer, The Allemall Foundation, closed escrow on the property and placed it in the hands of the newly formed Gualala River Park Conservancy LLC (GRPC). GRPC is providing RCLC two years to raise the money to purchase Mill Bend at cost. Along with numerous partners including the Mendocino Land Trust, RCLC has conducted due diligence for the acquisition. Phase I and Phase II environmental contaminant investigations were completed due to the property’s historical use as a sawmill. The studies identified old infrastructure debris such as asphalt, concrete and tires and also identified the likelihood of an underground gas tank where the lumber mill had operated. The underground tank was removed in August 2019 and determined a clean closure by the Regional Water Quality Control Board. The remaining, non-hazardous debris will be removed after the property is acquired by RCLC.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$320,000</b>
U.S. Fish and Wildlife Service (via a grant to the Conservancy)	\$980,000
California Natural Resources Agency	\$845,000
Sonoma Land Trust	\$50,000
Gualala Arts Center	\$50,000
<b>Project Total</b>	<b>\$2,245,000</b>

Conservancy funds for the proposed project are expected to be derived from an appropriation pursuant to the Safe Neighborhood Parks, Clean Water, Clean Air, and Coastal Protection Bond Act of 2000 (Proposition 12, Pub. Res. Code §§ 5096.300 et seq.). The funds will be those designated for statewide projects. The Conservancy may use these Proposition 12 funds to provide grants to government entities and nonprofit organizations, pursuant to Division 21, for the enhancement, restoration and development of coastal resources, beaches, waterfronts, and public accessways. (Pub. Res. Code § 5096.352(c)). Consistent with the purposes of these funds, RCLC will use the Conservancy grant to develop an integrated resource management plan that addresses enhancement and restoration of coastal wetlands and public use facilities including a new coastal trail segment in Sonoma and Mendocino counties under Chapter 5.5 of the Conservancy's enabling legislation.

The USFWS has awarded \$1,000,000 to the Conservancy for acquisition of the Mill Bend property. Approximately \$980,000 of the grant will support acquisition directly, while the remaining \$20,000 will pay for Conservancy staff costs. In addition, RCLC has been granted \$845,000 in Environmental Enhancement and Mitigation Program grant funds from the California Natural Resources Agency which will be directed towards acquisition of the property.

Both Sonoma Land Trust and the Gualala Arts have committed \$50,000 towards stewardship funds for the property if acquired.

In-kind services total \$127,000 for site analysis, preliminary appraisal and due diligence for planning and management of the acquisition; this includes \$71,754 from RCLC, \$38,500 from MLT and \$16,746 from Friends of the Gualala River. Additional in-kind services include an in-kind staff match contributed by Sonoma County Regional Parks District (\$30,000) and in-kind volunteer match contributed by California Native Plant Society (\$400).

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

The proposed project will be undertaken pursuant to Chapter 5.5 of the Conservancy's enabling legislation, Public Resource Code Section 31220 regarding improving and protecting coastal and marine water quality and habitats. Section 31220(a) authorizes the Conservancy to award grants for coastal habitat and coastal watershed projects that meet one or more criteria of Section 31220(b).

Consistent with Section 31220(b)(6), the project will acquire and protect coastal wetlands, riparian areas, and other sensitive watershed lands. Consistent with Section 31220(b)(2), the project will protect and restore fish and wildlife habitat within a coastal watershed. The project lies within the Gualala River coastal watershed, and the acquisition of the property for habitat protection and resource management planning will reduce threats to fish and wildlife, and protect coastal and riparian wetlands, floodplains and other sensitive watershed lands.

Consistent with Section 31220(b)(8), the project will plan for public access compatible with resource protection and restoration objectives through development of an integrated resource management plan.

Consistent with Section 31220(b)(9), the project will plan for the construction or expansion of a research facility that emphasizes conservation education in that it will plan for potential improvements to existing structures to facilitate their use as an environmental education and research facility.

As required by Section 31220(a), the Conservancy has consulted with the State Water Resources Control Board regarding the project's consistency with Chapter 3 of Division 20.4 of the Public Resources Code, regarding water quality of coastal waters and beaches. In accordance with Section 31220(c), the proposed project is consistent with the Integrated Watershed Management Program established under Public Resources Code Section 30947, local watershed management plans, and water quality control plans adopted by the SWRCB. Please see the discussion in the "Consistency with Local Watershed Management Plan/State Water Quality Control Plan" section of this report, below. Also, in accordance with Section 31220(c), the proposed project will contain a monitoring and evaluation component that includes indicators of ecosystem health (e.g., water quality, including flow rates and temperature, presence of salmonids).

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

Consistent with **Goal 1, Objective C**, the proposed project will design up to 1 mile of a new coastal trail segment.

Consistent with **Goal 1, Objective E**, the proposed project will secure real property to facilitate development of the coastal trail.

Consistent with **Goal 5, Objective A**, the proposed project will protect up to 113 acres of a significant coastal and watershed resource property.

Consistent with **Goal 5, Objective C**, the proposed project will preserve fish and wildlife corridors between core habitats along the coast and from coastal to inland habitat areas.

Consistent with **Goal 6, Objective A**, the proposed project will develop an integrated resource management plan for the restoration and enhancement of coastal habitats, including coastal wetlands, intertidal areas, forests and coastal prairies.

Consistent with **Goal 6, Objective C**, the proposed project will develop a plan to preserve and enhance a coastal floodplain.

**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 is consistent with the following state plans and policies:
  - *California @ 50 Million: The Environmental Goals and Policy Report* (Governor’s Office of Planning and Research, 2015). This project supports Pillar 5 and Development Goal 3 of the report – “Stewarding natural resources, including forests and wetlands to ensure that they store carbon, are resilient and enhance other environmental benefits”. The project will permanently protect acreage that was previously slated for dense development and restore vital coastal wetlands, thereby ensuring that these natural resources store carbon and are resilient to climate change.
  - *California Water Action Plan* (2016). This project supports Action 4) “to protect and restore important ecosystems”. The acquisition will permanently protect the wetland ecosystem at the mouth of the Gualala River and the integrated resource management plan will design restoration to improve water quality and the health and ecological function of the property’s important wetland habitats. Working in conjunction with NOAA, the project will produce new data to help restore coho salmon, a nearly extirpated species in the watershed.
4. **Support of the public:** Project letters are included in Exhibit 3.
5. **Location:** The estuarine portion of the project is located within the coastal zone of Sonoma and Mendocino counties south of the town of Gualala. The property’s uplands are located just outside the coastal zone, the protection of which will help protect and improve water quality for salmonid populations in the Gualala River, a coastal draining stream.
6. **Need:** Without Conservancy funding, RCLC will be unable to acquire the property to ensure permanent protection of the estuary and uplands, and the opportunity to plan for and provide a Coastal Trail connection to and along the lower Gualala River would be lost. If no planning funds are acquired, unmanaged public use of the site could continue to degrade habitat conditions at the river’s edge and elsewhere. The property owner would be without guidance for stewarding the sensitive and diverse natural resources of the site, and unintentional impacts to migratory birds, rare plants, and listed species like California red-legged frog could arise from uses and maintenance of the site. Without this funding, a timely opportunity to improve salmonid habitat would also be lost. NOAA’s Central California Coast Coho Salmon EDU Recovery Plan (2012) noted that the Gualala’s coho population was at extreme risk of extirpation or extinction, and stressors like changing climate are only escalating. If RCLC’s purchase cannot be completed, the property could be developed, which could lead to further degradation of estuary conditions.
7. **Greater-than-local interest:** The project has regional significance with respect to natural resources and recreation. The project will protect habitat for listed species within the Gualala watershed and estuary: the river is one of the key anadromous fish streams in northern Sonoma County and is a high priority for conservation and restoration as it is on

the federal Clean Water Act's 303(d) listing of impaired water bodies. For recreation, the project will plan for a link in the Coastal Trail connecting the Gualala Bluff trail to the north with the Gualala Point Regional Park south of the Gualala River bridge. Additionally, the project will plan for a spur trail along the lower reach of the Gualala River.

8. **Sea level rise vulnerability:** Sea level rise is having a significant impact on estuaries, especially those constrained to their current configuration by development and flood control infrastructure. The Mill Bend site contains relatively few of these human-made barriers, has undeveloped floodplain, and encompasses a range of elevations with generally good habitat connectivity among them. Completing the conservation purchase of Mill Bend and developing thoughtful approaches to estuary enhancement and public access improvements, will be essential to maintaining this natural resiliency to change. Despite the site's relative health, changing hydrology, changing salinity, and increased erosion from sea level rise will still pose a challenge to the Mill Bend site. Potential related changes to the estuary's geomorphology add complexity to forecasting impacts for the site. Current NOAA mapping addresses only the channel-closed configuration of the estuary. With 16" of sea level rise, that mapping forecasts that channel edge through the site will be flooded with greater frequency, during storms and high tides. Gravel bars may be frequently submerged. These changes would alter salmonid habitat and plant communities along the estuary edge. Increased erosion could affect any infrastructure at low elevation. With 55" of sea level rise, these changes and inundation would extend further landward. During the resource assessments and analysis phase of the project, forecasts for local sea level rise and increased flooding will be reviewed in detail and mapped. Conceptual designs for estuary enhancement and public access will address these projected conditions. Levels of risk and risk tolerance for project elements will be considered. Any constraints to potential upslope migration of plant communities and wildlife will be identified, and strategies proposed to maintain or strengthen connectivity and resilience. The conservation of the Mill Bend site is intended to be in perpetuity. The expected lifespan of specific projects such as the estuary enhancements will be determined during the planning process, taking into account sea level rise. Likewise, a recommended schedule for updating the plan over time, to adapt to changing conditions, will be developed.

#### **Additional Criteria**

9. **Urgency:** The Allemall Foundation has provided a two-year window for RCLC to purchase the property. If the conservation purchase cannot be completed within this timeframe, development of the property could occur in the future, and it is likely the high level of community momentum currently evident would be difficult to maintain.
10. **Leverage:** See the "Project Financing" section above.
11. **Readiness:** RCLC has signed a purchase option, applied for other grant funding and has increased its stewardship reserves and staff capacity in order to successfully carry out this project.
12. **Realization of prior Conservancy goals:** "See "Project History" above."

13. **Cooperation:** In 2016, RCLC formed the Mill Bend Coalition of local environmental and community groups to generate wide community interest in the project and receive public input. Participating members include the Mendocino Land Trust, County of Mendocino, Gualala Municipal Advisory Council, Friends of the Gualala River, Sonoma County Regional Parks District, Sonoma Land Trust, Gualala Arts, California Native Plant Society, the Moat Creek Managing Agency and members of the public.
14. **Vulnerability from climate change impacts other than sea level rise:** Climate change will influence every aspect of Mill Bend’s living systems over time, but the site has potential for relative resilience to many of these impacts. Coastal settings like the Gualala region are expected to experience more gradual warming than inland areas of California. The site’s relatively intact native habitats, spanning a topographic gradient from tidal marsh to redwood and pine forest, and its connectivity to adjacent natural habitats, are also valuable resources for adaptation. However, increasing temperature is still likely to stress plant and wildlife populations, especially sensitive species like salmonids and amphibians. Heat and more frequent drought may alter plant communities like redwood forest and may foster disease and pest outbreaks that could damage pine forest. Wildfire could become more likely, especially if forests are damaged and fuel load increases. During the resource assessments and analysis phase of the project, potential climate change impacts to the plants, wildlife, hydrology, ecological processes, and infrastructure of the site will be reviewed. Strategies to improve resilience to change will be developed as part of the Plan. Opportunities to maintain or improve the site’s carbon sequestration functions will also be considered.

**CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:**

The Mendocino County Local Coastal Program, certified in 1985 and revised and incorporated into the Mendocino County General Plan, Coastal Element in 1991, includes the following policies which the project will help implement: Policy 4.12-20 – identifies a portion of the property and states that it should be acquired for protection of natural resources and public access purposes by an appropriate conservation agency. Policy 4.12-21 – states that land interests should be obtained for a pedestrian trail providing public access to the Gualala River for fishing, hiking, swimming, etc.

The Sonoma County Local Coastal Program, certified in 1981 and revised and incorporated into the Open Space and Resource Conservation Element of the Sonoma County General Plan 2020, last amended August 9, 2016, includes the following policies which the project will help implement: Policy 3.1 for Biotic Habitat Areas, Goal OSRC-7 to protect and enhance the County’s natural habitats and diverse plant and animal communities by meeting the following objectives: “identify and protect native vegetation and wildlife particularly occurrences of special status species and wetlands; support use of native plant species and removal of invasive exotic species; and promote production of native marine and shoreline plant and animal habitats along the Pacific Coast”. Policy 9.1 for Parks and Equestrian and Hiking Trails, OSCR-17d designates the Gualala River Waterway Trail as part of the County’s goal to “establish a

countywide park and trail system that meets future recreational needs of the County's residents..."

**CONSISTENCY WITH LOCAL WATERSHED MANAGEMENT PLAN/STATE WATER QUALITY CONTROL PLAN:**

Under Public Resources Code section 31220(c), projects funded under Chapter 5.5 of Division 21, the Conservancy's enabling legislation, must be consistent with the Integrated Watershed Management Program established pursuant to PRC Section 30947 and local watershed management plans, "if available and relevant to the project." The proposed project is consistent with the relevant plan and program described below.

Integrated Watershed Management Program. The *North Coast Integrated Regional Water Management Plan, Phase III (NCIRWMP)*, prepared by *North Coast Resource Partnership, August 2014*) was developed pursuant to PRC § 30947. The NCIRWMP identifies six primary integrated water management goals and twelve associated objectives for the North Coast region, relevant at both the local and regional scale, of which the following apply to the proposed project: (Goal 1) Intraregional Cooperation and Adaptive Management and (Goal 3) Ecosystem Conservation and Enhancement. As discussed immediately below, the proposed project is consistent with applicable objectives of the NCIRWMP, and thus with the Integrated Watershed Management Program.

- Goal 1, Objective 1 – "Intraregional Cooperation and Adaptive Management. Respect local autonomy and local knowledge in plan and project development and implementation." The proposed project will meet the goals of local plans that have specifically mentioned the Gualala River and estuary as high priorities for protection and restoration such as the Gualala Estuary and Lower River Enhancement Plan, the Gulf of the Farallones National Marine Sanctuary - Final Management Plan, the Mendocino County Conservation Plan and the Mendocino County General Plan.
- Goal 3, Objective 5 – "Ecosystem Conservation and Enhancement. Conserve, enhance and restore watershed and aquatic ecosystems, including functions, habitats and elements that support biological diversity". The proposed project will ensure 113 acres remain undeveloped and develop an integrated resource management plan that recommends restoration and enhancement of the property's wetland, riparian and upland habitats. By these actions, the project will conserve, enhance and restore the biodiversity of a critical coastal parcel.
- Goal 3, Objective 6 – "Ecosystem Conservation and Enhancement. Enhance salmonid populations by conserving, enhancing, and restoring required habitats and watershed processes". The proposed project will reduce sediment discharges into the Gualala River watershed associated with development, thereby enhancing riparian habitat, improving water quality, decreasing water temperature and thus enhancing salmonid habitat.

**CEQA COMPLIANCE:**

The proposed project is categorically exempt from the California Environmental Quality Act under several sections of the CEQA Guidelines at Cal. Code of Regulations title 14. First, to the extent the property will be used for public access and recreation, it is exempt pursuant to section 15316 as an acquisition of land in order to establish a park where the land is in a natural condition or contains historical or archaeological resources and the management plan for the park has not been prepared; the majority of the property being acquired is in a natural condition, and a portion of the land contains historical resources. There is no existing management plan. The project is also exempt under section 15313 as an acquisition of land for preservation of fish and wildlife, and section 15325 as a transfer of an interest in land to preserve open space and habitat. The acquisition will protect the natural resources of the property for open space and habitat conservation. The two existing structures that are used for research will continue to be used for environmental education and research related to conservation of the property's natural resources.

Additionally, the planning portion of the project is statutorily exempt under CEQA Guidelines section 15262, because preparation of the management plan will involve only feasibility or planning studies for possible future actions, which the Conservancy has not yet approved, adopted, or agreed to fund. As required by CEQA Guidelines section 15262, planning for this project will include consideration of environmental factors.

The removal of the surface debris from the mill site is categorically exempt pursuant to CEQA Guidelines §15304, Minor Alterations to Land, which exempts, "minor alterations in the condition of land, water, and/or vegetation that do not involve the removal of healthy, mature, scenic trees except for forestry or agricultural purposes including grading on slopes of less than 10%, landscaping, and minor trenching and backfilling where the surface is restored ..."

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