CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
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CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY EXEMPTION FOR RESTORATION PROJECTS
CONCURRENCE NO. 21080.56-2025-083-R3

Project:	Mark West Creek and Wetland Restoration Project
Location:	Sonoma County
Lead Agency:	County of Sonoma, acting by and through its Regional Parks Department
Lead Agency Contact:	Melanie Parker; melanie.parker@sonomacounty.gov

Background

Project Location: The Mark West Creek and Wetland Restoration Project (Project) is located within the 1,192-acre Mark West Creek Regional Park & Open Space Preserve (Preserve), which is located at 3000 Porter Creek Road in unincorporated Sonoma County, east of the City of Santa Rosa. The Project is approximately 20 acres, near the coordinates of 38.54866, -122.699385.

Project Description: The County of Sonoma, Regional Parks Department (SCRP, Lead Agency) proposes to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend. The Project will benefit California Central Coast (CCC) coho salmon (*Oncorhynchus kisutch*) and steelhead (*Oncorhynchus mykiss*), as well as other species native to the Mark West Creek watershed. Project components include the establishment, restoration, and enhancement of freshwater wetlands; bioengineered bank stabilization; removal of small dams and legacy structures; and the restoration and enhancement of stream and riparian habitat and upper watershed sites combined with vegetation management.

The Mark West Creek watershed has been identified by the National Oceanic and Atmospheric Administration (NOAA), California Department of Fish and Wildlife (CDFW), and State Water Resources Control Board (SWRCB) as a priority stream for coho salmon recovery, with the Mark West Creek watershed maintaining some of the highest quality remaining habitat for coho salmon in the Russian River watershed. Plans developed by the above agencies have identified the lack of pool habitat, lack of winter refugia, and insufficient baseflow conditions as limiting factors for rearing juvenile coho in Mark West Creek. The Project would support the recovery of coho salmon by restoring streamflow and wetlands within the Preserve, improving fish passage to upstream cold-water reaches of the Mark West Creek watershed, elevating groundwater levels, and reducing erosion.

Establishment, restoration, and enhancement of freshwater wetlands would occur over approximately 15 acres and consists of four restoration activities: wet meadow swale restoration using fill; wet meadow swale restoration using beaver dam analogues; creation of wet meadow depressions; and revegetation plantings. Completion of these activities will result in improved in-channel flow, increased water surface elevation, improved groundwater recharge, and enhanced flows to the floodplain, all of which will lead to prolonged stream flow and delay drying of the ephemeral reaches of the Mark West Creek watershed within the Preserve. Biotechnical bank stabilization consisting of brush mattress and live willow pole plantings, removal of existing culverts, and restoration of a roughened channel will serve as grade control and bank stabilization for approximately 900 linear feet of channel within the Preserve. Small dams and legacy structures will be removed at two sites in Mark West Creek and Mill Creek. Both dams are small, relict concrete structures, with the dam located on Mill Creek being entirely removed, and the dam located on Mark West Creek having a 2-foot-by-2-foot notch cut into the structure. Removal and modification of these structures is intended to improve fish passage into perennial cold water reaches upstream within the Mark West Creek watershed.

To mimic and accelerate the natural process of wood recruitment and habitat formation, the Project will add large wood to approximately one mile of Mill Creek. This will consist of approximately 12 large wood structures containing key logs secured across the channel where the structures will enhance floodplain access, large pool formation, and aggrade coarse sediment. These wood structures will source trees within 500 feet of the creek that are either in decline, leaning over the creek, or in over-crowded even age stands. Additionally, engineered log jams will be installed along a 0.5-mile stretch of Mark West Creek to form approximately 1.7 acres of habitat for salmonids by creating interconnected pool-riffle complexes. These wood structures will be sourced from logs brought from off site and hazard trees along access routes within the Preserve. Process-based restoration methods will be implemented along approximately 11,000 linear feet of upper watershed tributaries, including brush packing, brush check dams, log or rock check dams, brush wattles, placement of logs on contour, and revegetation plantings. As part of the Project, approximately 70 to 100 dead, dying trees, or smaller clonal stems within 500 feet of Mark West Creek or Mill Creek will be removed. The woody material collected during forest thinning and limbing activities, as well as material sourced from other vegetation management projects occurring within the Preserve, will be used as source material for the Project's process-based restoration activities.

It is anticipated that the Project will be implemented within 30 years, with most restoration activities occurring within the first 10 years. Post-implementation maintenance and monitoring will be ongoing, consistent with the Preserve's existing vegetation management plan. The vegetation management plan has been developed to reduce wildfire hazards, protect and enhance water resources, maintain and enhance ecosystem integrity, and support adaptation to climate change.

Tribal Engagement: In 2019, SCRP contacted the Native American Heritage Commission to request a Sacred Lands File search and a list of Native American Tribes associated with the Preserve area. A list of eight contacts representing Tribes were provided, and SCRP contacted each to inform them of the development of the Preserve. Three of the contacts

expressed interest in being involved, and outreach has continued with the three Tribes. In February 2024, SCRP contacted the three Tribes to provide information on the Project, and one Tribe requested additional information on the Project, with two meetings being held in 2025 to discuss the Project further. SCRP will continue to invite interested Tribes to participate in field visits and monitoring of the Project site during implementation.

Interested Party Coordination: SCRP has held multiple meetings with public agencies to guide the planning, design, permitting, and implementation of the Project, including the United States Fish and Wildlife Service (USFWS), United States Army Corp of Engineers, National Marine Fisheries Service (NMFS), CDFW, the North Coast Regional Water Quality Control Board, Permit Sonoma, and Sonoma County Agricultural and Open Space District. Additionally, SCRP has met with Sonoma Resource Conservation District, Sonoma Land Trust, and neighboring landowners to discuss the Project. SCRP will continue additional outreach with all listed agencies prior to implementation and will continue neighbor outreach via email. General public outreach will occur via social media and the SCRP website.

Anticipated Project Implementation Timeframes: Start date: January 1, 2026
Completion date: January 1, 2056

Lead Agency Request for CDFW Concurrence: On October 22, 2025, the Director of the California Department of Fish and Wildlife (CDFW Director) received a concurrence request from the Lead Agency pursuant to Public Resources Code section 21080.56, subdivision (e) (Request). The Request seeks the CDFW Director's concurrence with the Lead Agency's determination on October 22, 2025 that the Project meets certain qualifying criteria set forth in subdivisions (a) to (d), inclusive, of the same section of the Public Resources Code (Lead Agency Determination). The CDFW Director's concurrence is required for the Lead Agency to approve the Project relying on this section of the California Environmental Quality Act (CEQA). (Pub. Resources Code, § 21000 et seq.).

Concurrence Determination

The CDFW Director concurs with the Lead Agency Determination that the Project meets the qualifying criteria set forth in Public Resources Code section 21080.56, subdivisions (a) to (d), inclusive (Concurrence).

Specifically, the CDFW Director concurs with the Lead Agency that the Project meets all of the following conditions: (A) the Project is exclusively to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or is exclusively to restore or provide habitat for California native fish and wildlife; (B) the Project may have public benefits incidental to the Project's fundamental purpose; (C) the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and includes procedures and ongoing management for the protection of the environment; and (D) Project construction activities are solely related to habitat restoration. Pursuant to Public Resources Code section 21080.56, subdivision (g),

CDFW will post this Concurrence on its CEQA Notices and Documents internet page: https://wildlife.ca.gov/Notices/CEQA.

This Concurrence is based on best available science and supported, as described below, by substantial evidence in CDFW's administrative record of proceedings for the Project.

This Concurrence is also based on a finding that the Project is consistent with and that its implementation will further CDFW's mandate as California's trustee agency for fish and wildlife, including the responsibility to hold and manage these resources in trust for all the people of California.

Discussion

A. Pursuant to Public Resources Code section 21080.56, subdivision (a), the CDFW Director concurs with the Lead Agency that the Project will exclusively conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or restore or provide habitat for California native fish and wildlife.

   Currently, Mark West Creek is one of the few tributaries in the Russian River watershed that is able to provide summertime flows that meet water quality conditions critical to coho salmon. However, the aquatic habitat in the Project area has had measured water temperatures above the threshold of coho salmon avoidance during summer months, lacks large wood that coho salmon prefer to utilize, and contains several potential passage barriers which prevent access to upstream cold water refugia.

   The Project will address these specific habitat limitations within the Preserve through restoration of stream and wetland habitat. The Project includes freshwater wetland restoration to enhance and prolong instream flows and improve water quality; the installation of engineered log jams which will increase aquatic habitat complexity; implementation of process-based restoration (such as wood loading and brush placement) to slow runoff and reduce erosion in smaller tributaries; and removal or modification of relict dams to allow for improved fish passage to upstream habitats for spawning, feeding, and shelter.

B. Pursuant to Public Resources Code section 21080.56, subdivision (b), the CDFW Director concurs with the Lead Agency that the Project may have incidental public benefits, such as public access and recreation.

   The Project may have incidental health and safety public benefits. Specifically, the Project may reduce wildfire risks by reducing ladder fuels, thinning dense stands, and increasing soil moisture in and around stream channels.

C. Pursuant to Public Resources Code section 21080.56, subdivision (c), the CDFW Director concurs with the Lead Agency that the Project will result in long-term net

benefits to climate resiliency, biodiversity, and sensitive species recovery, and includes procedures and ongoing management for the protection of the environment.

Long-term Net Benefits to Climate Resiliency: The Project will result in long-term net benefits to climate resiliency through the restoration of meadows and tributaries to Mark West Creek. Due to its unique geology, Mark West Creek provides a cool perennial source of water for native aquatic species, although some reaches of Porter Creek and Mark West Creek in the Preserve do not receive this benefit, which completion of the Project will address. Climate change is expected to condense the timing of rainfall, significantly extending the dry season. Through implementation of the Project, instream flows will be enhanced, improving fish access to approximately four miles of upstream refuge habitat, including cool perennial water that has more consistent streamflow over the dry season. The Project's wood loading and process-based restoration activities will result in increased stream habitat diversity and enhance natural stream processes, increasing habitat and species resilience to greater climate extremes expected in the future. Additionally, as wildfire frequency and intensity risk increases due to climate change, higher moisture availability resulting from completion of the Project would create a natural fuel break and may provide refugia for wildlife during fires.

Long-term Net Benefits to Biodiversity: The Mark West Creek watershed has been identified as a high priority stream for preservation and restoration by local, state, and federal agencies, with the Project area containing various habitat types, including streams, seasonal wetlands, riparian woodland and scrubland, and annual grassland. Through the restoration and enhancement of riverine conditions, creation of wet meadow wetlands and in-stream wetlands, the Project will result in enhanced stream baseflows, improved fish passage, and increased wood loading. These enhancements will result in improved access to upstream cold-water reaches, potentially improving genetic diversity of native species, and provide nesting, foraging, and dispersal habitat for native species.

Through the restoration of stream and wetland habitat, increased shallow surface water and groundwater will enhance the riparian woodland, scrubland, and seasonal wetland plant communities. These communities would include oak species (*Quercus spp.*), coyote brush (*Baccharus pilularis*), California rose (*Rosa californica*), toyon (*Heteromeles arbutifolia*), small-fruited bulrush (*Scirpus microcarpus*), common spikerush (*Eleocharis macrostachya*), and other rush, sedge and grass species. The expanded wetlands and aquatic habitats will improve the resilience of the ecosystem and its ability to support an increased diversity of plants, aquatic invertebrates, and insects, which in turn will support healthy populations of fish, amphibians, reptiles, birds, and small mammals native to the Preserve. Additional potential benefits of the Project include reduced erosion, improved water quality, and increased groundwater recharge within the Preserve, which in the long term is expected to improve habitat conditions and benefit the Preserve's biodiversity.

Long-term Net Benefits to Sensitive Species Recovery: The Project will result in long-term net benefits to multiple sensitive species native to the meadow and aquatic

habitats of the Mark West Creek watershed. Mark West Creek has been identified as a priority stream in both the 2012 NMFS Central California Coast Coho Salmon Recovery Plan and 2014 California Water Action Plan, with both Plans highlighting a need for enhanced instream flows. Completion of the Project will benefit both coho salmon and steelhead through the enhancement of instream flows, increased habitat complexity, improved fish passage, improved spawning and juvenile rearing habitat, and reduction of erosion and incision.

Additionally, the Project will benefit northwestern pond turtle (*Actinemys marmorata*), California giant salamander (*Dicamptodon ensatus*), red-bellied newt (*Taricha rivularis*), foothill yellow-legged frog (*Rana boylii*), northern coastal roach (*Hesperoleucus venustus navarroensis*), and hardhead (*Mylopharodon conocephalus*). These sensitive species will benefit in the long-term through the Project increasing the area and wetted duration of aquatic habitat, increased habitat diversity in intermittent channels, improved access to upstream perennial waters, and increased instream vegetation.

Procedures for the Protection of the Environment: The Project will incorporate and implement protection measures based on relevant state and federal permits, including but not limited to, any applicable CDFW permits, the SWRCB's Section 401 Water Quality Certification and Waste Discharge Requirements for Restoration Projects Statewide, the USFWS Programmatic Biological and Conference Opinion California Statewide Programmatic Restoration Effort, and the NMFS Programmatic Biological Opinion for Restoration Projects within the NOAA Restoration Center's Central Coastal California Office Jurisdiction. Measures include, but are not limited to: pre-restoration surveys; biological monitoring; isolation of in-water restoration activities; environmental awareness training, environmentally sensitive area delineation, invasive species and pathogen prevention actions; avoidance and minimization of disturbance to sensitive habitats; and revegetation.

Ongoing Management for the Protection of the Environment: The Project will be implemented in phases, with monitoring and maintenance occurring after each phase. A monitoring plan for the Project is being developed and will include monitoring vegetation establishment success criteria, groundwater level, stream flow, and other indicators of ecological health. Maintenance of the Project area will include non-native vegetation management actions, such as hand removal, mowing, root excavation, and other non-mechanical applications to cut materials. It is anticipated that the majority of the Project will be implemented within 10 years, dependent on funding, and all phases of the Project will be implemented within 30 years.

D. Pursuant to Public Resources Code section 21080.56, subdivision (d), the CDFW Director concurs with the Lead Agency that the Project does not include any construction activities, except those solely related to habitat restoration.

To accomplish restoration, activities may include usage of heavy equipment to implement wetland restoration, consisting of excavation and grading of portions of the Project site; removal of relict dam structures on Mill Creek and Mark West Creek;

installation of engineered logjams and large wood structures; and implementation of process-based restoration activities such as wood loading and directional felling of trees. All of the activities are for the sole purpose of habitat restoration.

Scope and Reservation of Concurrence

This Concurrence is based on the proposed Project as described by the Lead Agency Determination and the Request. If there are any subsequent changes to the Project that affect or otherwise change the Lead Agency Determination, the Lead Agency, or any other public agency that proposes to carry out or approve the Project, shall submit a new lead agency determination and request for concurrence from CDFW pursuant to Public Resources Code section 21080.56. If any other public agency proposes to carry out or approve the Project subsequent to the effective date of this Concurrence, this Concurrence shall remain in effect and no separate concurrence from CDFW shall be required so long as the other public agency is carrying out or approving the Project as described by the Lead Agency Determination and the Request.

Other Legal Obligations

The Project shall remain subject to all other applicable federal, state, and local laws and regulations, and this Concurrence shall not weaken or violate any applicable environmental or public health standards. (Pub. Resources Code, § 21080.56, subd. (f).)

CDFW Director's Certification

By: _____ Date: 12/8/25

Charlton H. Bonham, Director
California Department of Fish and Wildlife