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CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY EXEMPTION FOR RESTORATION PROJECTS
CONCURRENCE NO. 21080.56-2026-109-R3

Project:	Resilient Landscapes Restoration SERP: Portola Redwoods State Park & Peters Creek Project
Location:	San Mateo County
Lead Agency:	California Department of Parks and Recreation
Lead Agency Contact:	Portia Halbert; Portia.Halbert@parks.ca.gov

Background

Project Location: The Resilient Landscapes Restoration SERP: Portola Redwoods State Park & Peters Creek Project (Project) is located on approximately 2,030 acres within Portola Redwoods State Park and an adjacent Save the Redwoods League property, known as Peters Creek. The Project is situated near unincorporated La Honda in San Mateo County, southwest of Highway 35 and north of Highway 9, and centered at approximately 37.270064, -122.204363.

Project Description: California Department of Parks and Recreation (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 and restore or provide habitat for California native fish and wildlife. The Project area contains diverse vegetation types, including old-growth coast redwood (*Sequoia sempervirens*) forest, second-growth redwood and Douglas fir (*Pseudotsuga menziesii*) forests, hardwood forest, chapparal, meadows, and riparian corridors where decades of fire exclusion, conifer encroachment, elevated fuel loads, and the spread of sudden oak death have increased wildfire risk and reduced ecological function across the site and portions of the larger landscape. While these forests were largely spared from the high-severity CZU Lightning Complex fire in 2020, the Project area is located north of Big Basin Redwoods State Park, where approximately 70% of known marbled murrelet (*Brachyramphus marmoratus*; listed as threatened under the federal Endangered Species Act [ESA] and California Endangered Species Act [CESA]) nesting habitat was severely altered.

The towering old-growth redwoods, along with large, decadent Douglas fir trees within the Project area have historically provided potential nesting habitat for marbled murrelet. The Project is designed to restore ecological function, enhance native biodiversity, and support the development of late-seral forest conditions through a combination of phased restoration treatments including prescribed fire, selective thinning, invasive species control,

and road infrastructure improvements within the Project area. Restoration treatments will improve nesting habitat for marbled murrelets by increasing crown complexity and reducing adjacent ladder fuels, while also promoting increased light availability and understory management, which is expected to also improve habitat conditions for Dudley's lousewort (*Pedicularis dudleyi*), a rare redwood-associated plant. The Project will also benefit oak woodlands, meadows, chaparral, and riparian habitats by improving forest structure, hydrologic function, and species diversity.

The Project will implement a phased approach over multiple years. During these phased periods some of the treatments will overlap across the treatment types described below. Within the site, some areas may receive more than one treatment over multiple phases. For example, an area may receive both pile burning and broadcast burning treatments. Based on GIS analysis, approximately 1,451 acres are mapped for one treatment, 529 acres for two treatments, 46 acres for three treatments, and approximately 4 acres for four or more treatments. In total, approximately 579 acres include overlapping treatments.

The Project includes the following restoration treatments:

- Prescribed fire includes approximately 294 acres of pile burning and 1,521 acres of broadcast burning to restore the ecological role of fire, promote native plant diversity, reduce fuel accumulations, and create conditions that support healthy understory regeneration. All burn operations will follow an approved burn plan, with required air quality and burn permits, and be led by qualified personnel and conducted in coordination between the Lead Agency, Save the Redwoods League, and partner agencies/organizations.
- Creation and maintenance of approximately 87 acres of control line to manage treatment areas and protect old-growth redwoods and wildlife trees. Approximately 63 acres will include utilizing and/or repurposing existing road networks within the Project area. Approximately 24 acres of new control lines will be created, as well. New control line work will include reducing vegetation height and fuel loading in an area up to 40 feet wide. Depending on topography, this work will include using hand tools (such as mcleods, shovels, rakes, Pulaskis, chainsaws, etc.) and/or heavy machinery (such as tractors, excavators, bulldozers, masticators, etc.) and may include clearing vegetation and accumulated fuels, pruning overhanging branches, limbing trees, and reducing adjacent fuel concentrations where needed to improve their effectiveness as control lines. Cut vegetation may be lopped and scattered, piled and burned, relocated further inside the unit, or masticated where equipment access is feasible. Areas of bare mineral soil will be treated post-burn to prevent erosion where necessary.
- Targeted thinning of approximately 21 acres of Douglas fir encroaching into oak woodlands, chaparral, and meadows to promote native habitat structure and plant community diversity. Treatments will consist of hand-thinning Douglas fir. Mastication or hand lopping may occur in dense brush and small-diameter hardwood stands, targeting material less than 12 inches in diameter. Mastication will be limited to slopes less than 50 percent, with hand treatments applied on steeper terrain. Heavy equipment such as feller bunchers, excavators, and large trucks may be used to fell, move, and process trees and other biomass.

- Thinning of approximately 54 acres of second-growth redwood and thinning and/or pile burning of approximately 518 acres of Douglas fir stands to reduce stem density, improve forest structure, and accelerate development of late-seral characteristics. Treatments will consist of hand-thinning Douglas fir and use of heavy equipment for large diameter trees. Mastication or hand lopping may occur in dense brush and small-diameter hardwood stands, targeting material less than 12 inches in diameter. Mastication will be limited to slopes less than 50 percent, with hand treatments applied on steeper terrain. Cut material may be chipped, piled and burned, consumed in an air curtain burner or equivalent under proper permits and coordination, then lopped and scattered, or removed from the site. Low to moderate intensity prescribed burns may be introduced where conditions allow to reduce residual fuels, promote nutrient cycling, and maintain open structure over time.
- Invasive species control will occur across approximately two acres using manual, mechanical, and chemical techniques. Target invasive species include periwinkle (*Vinca major*), stinkwort (*Dittrichia graveolens*), French broom (*Genista monspessulana*), and other non-native vegetation.
- Accelerated wood recruitment (AWR) along 2,700 feet of Peters Creek by selective cutting and directional felling of approximately 22 understory trees to place large woody material into the stream and riparian corridors. All felling will be conducted without heavy equipment using a “chop-and-drop” approach. AWR will increase channel complexity, provide cover and refuge, promote pool formation, and improve habitat conditions for native aquatic species, including steelhead – central California coast DPS (*Oncorhynchus mykiss irideus* pop. 8; listed as threatened under ESA and California State Species of Special Concern (SSC)), and coho salmon – central California coast ESU (*Oncorhynchus kisutch*; listed as threatened under ESA and CESA).
- Road abandonment and/or road repair efforts will focus on portions of Old Page Mill Road and East Middleton Road within the Peters Creek watershed that are either no longer in use and/or will serve as a fuel break. Treatments may include removal of failing culverts, replacement with appropriately sized culverts or alternative crossing structures (e.g., ford and free span structures) and decommissioning of road segments where appropriate. These activities are expected to improve hydrologic function, reduce erosion and sediment delivery, and enhance aquatic habitat within the watershed. Heavy equipment such as excavators and large trucks may be used to remove infrastructure, move earth, and abate dust.
- Additional small-diameter tree thinning and pile burning within the Forest Health and Wildfire Resilience Corridors include approximately 15 acres of Peters Creek, approximately nine acres of East Middleton Road, approximately 16 acres of Southeast Ridge Road, approximately 110 acres of Old-Growth Management Unit, and approximately four acres of Shreve Oak Management unit.

Ongoing maintenance activities for the Project may include reapplication of prescribed fire within the applicable areas described above, additional invasive species control, and selective manual thinning of regenerating ladder fuels.

Tribal Engagement: The Lead Agency contacted several tribes identified by the Native American Heritage Commission. The Amah Mutsun Tribal Band and the Association of Ramaytush Ohlone responded with requests for further Project coordination and additional information. The Lead Agency will continue to provide the requested information to tribal representatives and will facilitate site visits, direct meetings, and other methods of communication to ensure ongoing communication and collaboration with all tribal partners.

Interested Party Coordination: The Lead Agency coordinated with the Portola and Castle Rock Foundation to develop an interpretation and education action plan to support public understanding of the Project. As a part of this effort, the Lead Agency hosted a public hearing session for neighboring residents and interested parties to present the Project scope, address safety considerations, and respond to questions and concerns. Public outreach flyers were distributed within the Portola Redwoods State Park and to residents located within 300 to 1,000 feet downstream of the Project area, including an invitation to attend an in-person meeting held at Portola Redwoods State Park on January 31, 2026. A virtual presentation was also conducted by the Lead Agency, to inform internal interested parties and volunteers about the Project. Ongoing outreach and communication will include intermittent social media posts and the development of a publicly posted interpretive video describing the forest management plan.

Anticipated Project Implementation Timeframes: Start date: July 2026
Completion date: December 2036

Lead Agency Request for CDFW Concurrence: On July 16, 2026, 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 July 13, 2026, 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.

   The Project will create future redwood forest conditions suitable for marbled murrelet, Townsend's big-eared bat (*Corynorhinus townsendii*, SSC), Santa Cruz black salamander (*Aneides niger*; SSC), California giant salamander (*Dicamptodon ensatus*; SSC), California red-legged frog (*Rana draytonii*, CRLF; SCC and listed as threatened under ESA), American badger (*Taxidea taxus*; SSC), hoary bat (*Lasiurus cinereus*), as well as many other native species that inhabit the Project area. By accelerating development of late seral forest characteristics, forestlands within the Project will contain greater numbers of large trees, which marbled murrelet are known to inhabit. Forest density reductions will create larger canopy openings, promoting quality habitat conditions needed for native raptor and bat species, while allowing sunlight to reach the forest floor to improve understory diversity of native plant species, including Dudley's lousewort, Hoffman's sanicle (*Sanicula hoffmannii*), California bottlebrush grass (*Elymus californicus*), and white-flowered rein orchid (*Piperia candida*). Downed woody debris left from restoration treatments will provide improved habitat conditions for CRLF, Santa Cruz black salamander, California giant salamander, California newt (*Taricha torosa*), and other small amphibian and mammal species. In addition to terrestrial habitat benefits, the Project includes riparian and watershed restoration enhancements, including culvert removal, road abandonment, erosion reduction, and AWR, intended to improve watershed and hydrologic function, streamflow connectivity, channel complexity, and water quality. AWR will increase pool formation, instream cover, sediment storage, and hydraulic complexity to enhance spawning, rearing, and refuge habitat for native aquatic species, including steelhead, coho salmon, Pacific lamprey (*Entosphenus tridentatus*; SSC), and other native fishes within the Peters Creek watershed.

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 public access, safety, and education benefits. The Project occurs within Portola Redwoods State Park and adjacent areas that are open to the public. Restoration treatments implemented as part of the Project will remove hazardous, standing dead trees near roads and developed areas, creating safer conditions for public access, and will reduce the likelihood of closures associated with wildfire risk or hazardous conditions. By reducing fuel loads and restoring fire-adapted forest conditions, the Project is expected to lower the risk of high-severity wildfire near public roads, trails, park infrastructure, and adjacent private lands and may help to protect visitor safety, nearby residents, and park facilities while supporting long-term ecosystem resilience. Additionally, interpretive signage, guided walks, or other educational materials may be posted on site to highlight the ecological goals of the Project, which will demonstrate the Project's forest restoration techniques and provide the public with an understanding of fire-adapted ecosystems, habitat conservation, and the role of active stewardship in building forest resilience.

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 is expected to significantly improve long-term climate resiliency across the Project area by restoring forest structure, reducing vulnerability to high-severity wildfire, and enhancing the ability of dominant species to persist under increasing climatic stress. Over a century of fire exclusion and past land use practices have resulted in unnaturally dense second-growth stands, especially in the redwood and Douglas fir forests. These overstocked conditions have created high competition for light, nutrients, and water, weakening tree vigor and making stands more susceptible to drought, insect outbreaks, and disease. Sudden Oak Death has had widespread impacts on tanoak and other oak species in coastal California forests. Through understory thinning and targeted reduction of encroaching bay laurel (*Umbellularia californica*), the Project will reduce the cool, shaded conditions that facilitate pathogen spread, and will support long-term forest health by increasing stand-level resistance to disease. Strategic stand thinning will also reduce this competition, improving the physiological health and water balance of remaining forest stands and increasing their resiliency to climate extremes such as heatwaves and/or prolonged drought. Prescribed fire will be used to reduce surface and ladder fuels, restore a key ecological process, and maintain open stand structure that promotes ecosystem adaptation, resulting in lower tree mortality and greater seedling establishment. By implementing these restoration treatments, the Project will help ensure that forests conditions are better equipped to withstand future disturbances associated with climate change including wildfire and other climate-driven disturbances within the Project area.

Long-term Net Benefits to Biodiversity: Decades of fire suppression have allowed conifer encroachment into historically open areas such as oak woodlands, chaparral, and meadows. These changes have shaded out native understory plants, reduced forage availability, and degraded habitat for pollinators and native wildlife species dependent on open and/or edge habitat. By removing Douglas-fir and other shade-tolerant species from these transitional areas, the Project will increase light availability and restore historic vegetation composition and structure, and promote a more diverse assemblage of native shrubs, grasses, and forbs which are critical to native pollinators, including the obscure bumblebee (*Bombus caliginosus*), western bumble bee (*Bombus occidentalis*; a candidate species for listing under CESA), and unsilvered fritillary (*Speyeria adiaste*). Additionally, thinning in hardwood-conifer forests can significantly improve pollinator habitat by increasing floral abundance and enhancing nest sites. Prescribed fire will further contribute to biodiversity by creating a mosaic of successional stages and microhabitats needed to support a wider range of native species. Restoration treatments are expected to improve species richness, reestablish ecosystem function, and expand habitat connectivity across the existing fragmented forest matrix.

In addition, AWR and legacy road treatments will enhance habitat complexity within the watershed by improving water quality, channel structure, instream cover, and habitat connectivity. These changes will benefit native aquatic species including steelhead, coho salmon, and Pacific lamprey, as well as amphibians including California red-legged frog, Santa Cruz black salamander, and other riparian-associated wildlife. Overall, the Project will enhance biodiversity across a range of forest and aquatic habitats by restoring natural disturbance regimes, promoting structural heterogeneity, and supporting habitat conditions necessary for a broad suite of native species.

Long-term Net Benefits to Sensitive Species Recovery: The Project will promote the development of late seral forest conditions needed to support native species habitat, which will result in long-term net benefits to sensitive species recovery. While nearby areas such as Big Basin Redwoods State Park and Pescadero Creek County Park experienced substantial loss of suitable marbled murrelet habitat during the 2020 CZU Lightning Complex, Portola Redwoods State Park retains intact habitat of varying quality that can be enhanced through implementation of restoration treatments to support sensitive species recovery. Planned restorative forest health treatments to remove mid-range diameter redwood will allow for increased growth and wildfire resilience of residual redwood stands. Over time, residual redwood stands will develop larger branches in the canopy increasing nesting habitat for marbled murrelet. These treated residual redwood stands within the Project will improve habitat connectivity to other late seral and old growth stands that exist within and in proximity to the Project area, connecting adjacent habitat for other forest-dependent sensitive species such as Townsend's big eared bat, and American peregrine falcon (*Falco peregrinus anatum*).

The Project is expected to also increase the abundance and diversity of understory plants and invertebrates, to support prey availability for CRLF; foothill yellow-legged frog – central coast DPS (*Rana boylii* pop. 4; listed as threatened under ESA and

endangered under CESA); California giant salamander; and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*; listed as endangered under ESA and CESA). Increased sunlight, improved forest structure, and reduced fuel loading are also expected to promote conditions favorable to native understory and forest floor sensitive species, including Dudley's lousewort, minute pocket moss, and white-flowered rein orchid, while invasive species control will help maintain suitable microhabitat conditions needed for sensitive native plants.

Aquatic and riparian restoration treatments, including culvert removal, road abandonment, erosion reduction, and AWR, will improve stream connectivity, channel complexity, and water quality within the Pescadero Creek watershed, listed as impaired for sediment on the Clean Water Act Section 303(d) list and subject to a Total Maximum Daily Load. AWR will increase instream habitat complexity, a key limiting factor for native salmonid species, by promoting pool formation, cover, and hydraulic complexity. Restoration treatments will provide long-term benefits to steelhead and coho salmon, as well as other native aquatic species by enhancing spawning, rearing, and refuge habitat and reducing chronic sediment delivery to aquatic habitat across the Project area.

Prescribed fire and fuel reduction treatments will also expand and create basal hollows, cavities, snags, and large woody debris in redwood trees and snags, which are utilized by Townsend's big-eared bat and other wildlife species for roosting and shelter.

Collectively, these treatments are expected to enhance habitat quality, restore ecological processes, and improve long-term resilience for sensitive species occurring within and adjacent to the Project area.

Procedures for the Protection of the Environment: The Project includes avoidance, minimization, and conservation measures intended to protect sensitive resources and the environmental including established best management practices and operational standards incorporated as part of the California Forest Practices Rules. Measures include, but are not limited to, avoiding sensitive species and habitats; invasives species management and spread prevention; pre-construction surveys and species-specific avoidance; erosion control; water quality; equipment maintenance and spill prevention; and archeological and cultural resource protection. The Project will incorporate erosion control best management practices as well, including limiting the use of heavy equipment on steep slopes (approximately > 50%) and utilizing hand treatments or other low-impact methods where appropriate to minimize soil disturbance and sediment delivery.

Ongoing Management for the Protection of the Environment: Save the Redwoods League will continue to manage and steward the Peters Creek property for the foreseeable future, with a long-term vision of transferring the land to the Lead Agency for permanent management. Following completion of the Project's initial restoration treatments, Save the Redwoods League will continue to collaborate with the Lead Agency to implement a cross-boundary prescribed fire program to maintain forest

health, resilience, and biodiversity. The timing and frequency of additional treatments will be informed by ongoing monitoring of vegetation conditions, fuel loading, and habitat conditions and will be consistent with both the Portola Redwoods State Park Forest Management Plan and the California Cooperative Forest Management Plan for Peters Creek. The Lead Agency will continue to support ongoing habitat protection and stewardship through periodic prescribed burns needed to reduce fuel accumulation, promote native species habitat, and maintain late-seral structural development. In addition, the Lead Agency will continue to implement invasive species management and adaptive management treatments as part of ongoing park-wide maintenance under the existing Vegetation Management Statement and other existing land management and maintenance programs.

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.

   Use of heavy equipment will be limited for the purpose of habitat restoration activities, including forest thinning, understory vegetation treatments, large wood felling needed to enhance aquatic habitat, removal of legacy road crossings to improve hydrologic function, and processing and disposal of biomass generated from thinning activities.

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: Signed by: Meghan Hertel 19042A1B72454D8... Date: 8/13/2026

Meghan Hertel, Director
California Department of Fish and Wildlife