

Appendix A

**NOP/IS, Scoping Meeting  
Materials, and NOP and  
Scoping Meeting Comments**



**The Los Cerritos Wetlands Authority greensplains its Restoration Plan for the Los Cerritos Wetlands. The public comment period on the Initial Study ends April 8th. Please review and comment online at: <http://intoloscerritoswetlands.org/the-lcws-eir/>**

The Los Cerritos Wetlands Authority has now “optimized” its Final Los Cerritos Wetlands Conceptual Restoration Plan of 2015 to complete the Los Cerritos Wetlands Program EIR. Because the LCWA agreed to new oil extraction operations, sites once proposed for a visitors center and least tern nesting area will become oil drilling platforms. The visitors center, parking lot, and access road will move onto the wetlands. A new pipeline will extend across the wetlands and over the Newport Inglewood earthquake fault. “Restoration” plans include breaching the berm now protecting Steamshovel Slough, the only ancient salt marsh in Southern California, polluting the marsh with contaminants from years of oil drilling while flooding existing wetlands with saltwater. New trenches on the Seal Beach/Hellman Ranch property will flood tribal natural/cultural resources and sites and reduce habitat for wildlife. LCWA’s plan ignores new evidence that added tidal influence is not true restoration and is not needed due to climate change/sea level rise.

The LCWA is composed of 4 voting members, the Coastal Conservancy, the Rivers and Mountains Conservancy, and the cities of Long Beach and Seal Beach. The LCWA traded our public land to expand fossil fuel extraction from 300 to 24,000 barrels a day. They think that an additional 70,000 tons of GHG emissions and 200,000 barrels of oil are worth the deed to lands that will be underwater in 50 years. They now propose to increase public access and tidal influence to “restore” the Los Cerritos Wetlands. As long as the wetlands are under their control we will continue to question their decisions. Our asks include:

1. No trenching or bulldozing on Hellman Ranch wetlands, no trails through wildlife habitat
2. Minimal disturbance of wildlife habitat (including non-native plants) no pesticides/herbicides
3. Protect existing salt pannes (salt deposits that were a trade item for local tribal peoples)
4. Involve tribal ethnobotanists in restoration planning (pay them!)
5. No Visitors Center on wetlands\*
3. No breaching of berm protecting Steam Shovel Slough\*
4. No pipeline across wetlands\*

\* The LCWA states that these decisions cannot be challenged because they were approved as part of the oil drilling project. We think they should be open to discussion as they pose serious risks to the success of any proposed restoration.

## **INITIAL STUDY**

# **LOS CERRITOS WETLANDS RESTORATION PLAN**

**LOS CERRITOS WETLANDS AUTHORITY**



***Los Cerritos Wetlands Authority***

Submitted to:

Los Cerritos Wetlands Authority  
100 North Old San Gabriel Canyon Road  
Azusa, California 91702  
(626) 815-1019

Prepared by:

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Project No. D170537

March 2019

**Additional comments from  
LACFCD.**

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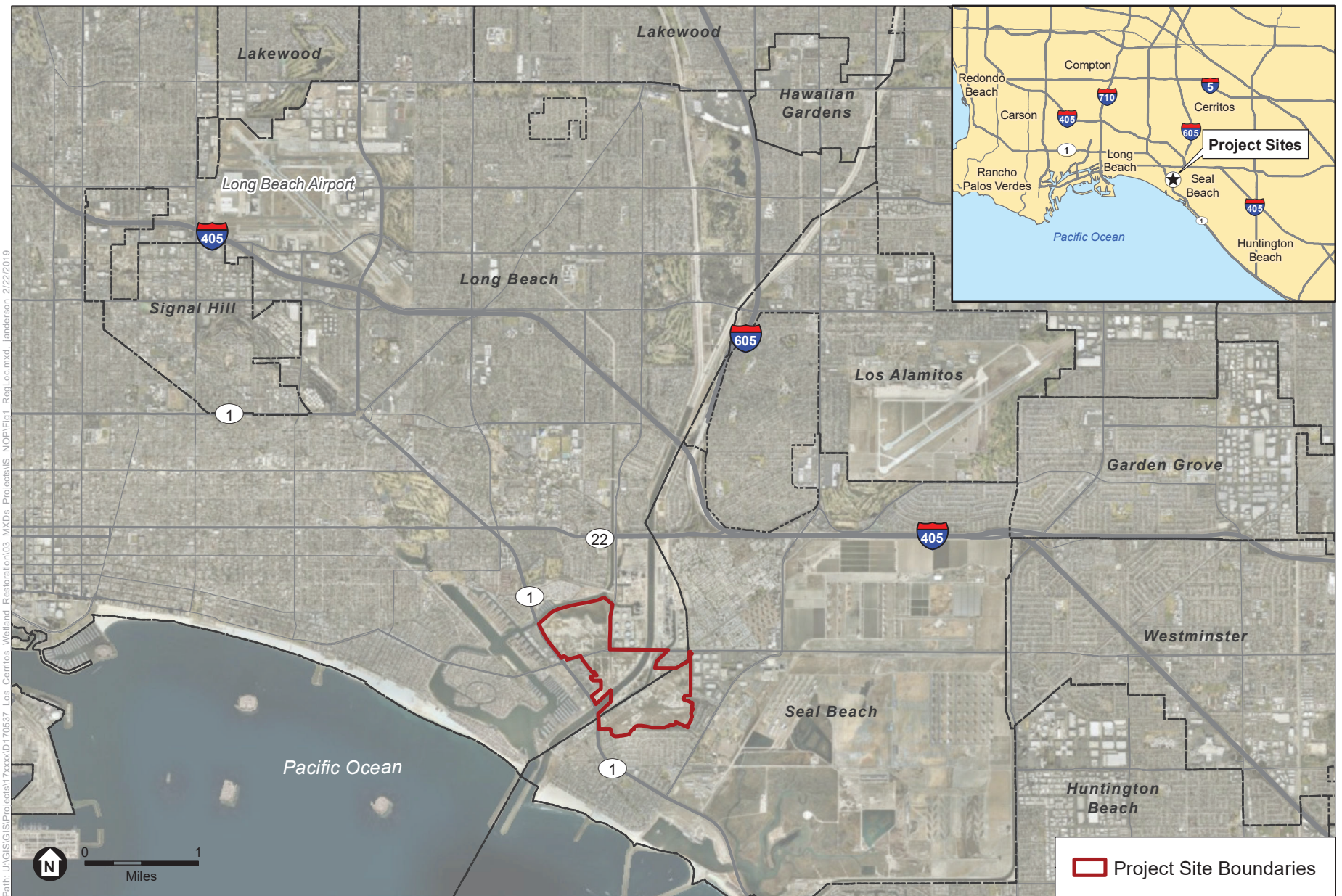
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# INITIAL STUDY

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- 1. Project Title:** Los Cerritos Wetlands Restoration Plan
- 2. Lead Agency Name and Address:** Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Road  
Azusa, CA 91702
- 3. Contact Person and Phone Number:** Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Rd.  
Azusa, California 91702  
(626) 815-1019  
sgee@rmc.ca.gov
- 4. Project Location:** The program area is located in the North Seal Beach area and East Long Beach area, straddling the border of Orange County and Los Angeles County in southern California. **Figure 1** shows the regional location of the proposed program and **Figure 2** shows a localized view of the program area.
- 5. Project Sponsor's Name and Address:** Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Road  
Azusa, CA 91702
- 6. General Plan Designation(s):** Community Facilities, Industrial-Oil Extraction, Open Space, Commercial Service, Unassigned, Land Use District No.7 Mixed Uses
- 7. Zoning:** Specific Plan Regulation, Open Space Natural, Oil Extraction, Planned Development District 1



SOURCE: ESRI

Los Cerritos Wetlands Restoration Plan Program EIR

**Figure 1**  
Regional Location





SOURCE: Mapbox, LCWA

Los Cerritos Wetlands Restoration Plan Program EIR

**Figure 2**  
Project Site and Local Vicinity

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## 8. Description of Project:

### a) Introduction

The Los Cerritos Wetlands Authority (LCWA), as the Lead Agency pursuant to CEQA, is proposing to implement the Los Cerritos Wetlands Restoration Plan. The Los Cerritos Wetlands Restoration Plan is a planning document that identifies restoration designs for 503 acres of land. The program area contains large expanses of open space, including wetland habitat, as well as other uses described in more detail below.

### b) Background

The LCWA, founded in 2006, is a joint powers authority consisting of the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC), State Coastal Conservancy (SCC), and Cities of Long Beach and Seal Beach. The LCWA currently owns 165 acres within the program area.

The LCWA previously developed the Los Cerritos Wetlands Final Conceptual Restoration Plan, a restoration alternatives analyses report that provides the LCWA with a roadmap for habitat enhancement and improved public access. Adopted by the LCWA Board of Directors in August 2015, the Los Cerritos Wetlands Final Conceptual Restoration Plan identifies three restoration design alternatives with varying degrees of alterations to existing site conditions. This plan is supported by eight technical reports that provide baseline information for numerous topics including hydrology and hydraulics, soils, watershed, and habitat.

A portion of the program area has been evaluated as part of a project-level Environmental Impact Report for the Los Cerritos Wetlands Oil Consolidation and Restoration Project. The EIR evaluated the environmental impacts associated with the consolidation of existing oil operations and implementation of a wetlands habitat restoration project. The EIR was certified by the City of Long Beach City Council on January 16, 2018.

### c) Project Objectives

As documented in the Los Cerritos Wetlands Final Conceptual Restoration Plan, the goals and objectives of the proposed program are presented here (Moffatt & Nichol, 2015):

- 1) Restore tidal wetland process and functions to the maximum extent possible
  - a) Increase estuarine habitat with a mix of tidal channels, mudflat, salt marsh, and brackish/ freshwater marsh and ponds.
  - b) Provide adequate area for wetland-upland ecotone and upland habitat to support wetlands.
  - c) Restore and maintain habitat that supports important life history phases for species of special concern (e.g., federal and state listed species), essential fish habitat, and migratory birds as appropriate.
- 2) Maximize contiguous habitat areas and maximize the buffer between habitat and sources of human disturbance.



- 
- a) Maximize wildlife corridors within the LCW Complex and between the LCW Complex and adjacent natural areas within the region.
  - b) Incorporate native upland vegetation buffers between habitat areas and human development to mitigate urban impacts (e.g., noise, light, unauthorized human encroachment, domestic animals, wastewater runoff) and reduce invasion by non-native organisms.
  - c) Design the edges of the LCW Complex to be respectful and compatible with current neighboring land uses.
- 3) Create a public access and interpretive program that is practical, protective of sensitive habitat and ongoing oil operations, economically feasible, and will ensure a memorable visitor experience.
    - a) Build upon existing beneficial uses.
    - b) Minimize public impacts on habitat/wildlife use of the LCW Complex.
    - c) Design interpretive concepts that promote environmental stewardship and the connection between the wetlands and the surrounding community.
    - d) Solicit and address feedback from members of the surrounding community and other interested parties.
  - 4) Incorporate phasing of implementation to accommodate existing and future potential changes in land ownership and usage, and as funding becomes available.
    - a) Include projects that can be implemented as industrial operations are phased out and other properties are acquired over the near-, mid- and long-term (next 10 years, 10-20 years, and 20+ years).
    - b) Investigate opportunities to restore levels of tidal influence that are compatible with current oil leases and neighboring private land holdings.
    - c) Remove/realign/consolidate existing infrastructure (roads, pipelines, etc.) and accommodate future potential changes in infrastructure, to the maximum extent feasible.
  - 5) Strive for long-term restoration success.
    - a) Implement an adaptive management framework that is sustainable.
    - b) Restore habitats in appropriate areas to minimize the need for long-term maintenance activities that are extensive and disruptive to wildlife.
    - c) Design habitats that will accommodate climate changes, e.g., incorporate topographic and habitat diversity and natural buffers and transition zones to accommodate migration of wetlands with rising sea levels.
    - d) Provide economic benefit to the region.
  - 6) Integrate experimental actions and research into the project, where appropriate, to inform restoration and management actions for this project.

- 
- a) Include opportunities for potential experiments and pilot projects to address gaps in information (e.g., effect of warm river water on salt marsh ecosystem) that are protective of sensitive habitat and wildlife and that can be used to adaptively manage the restoration project.
  - 7) Include areas on the site, where appropriate, that prioritize research opportunities (such as those for adaptive management) over habitat sensitivities.

#### d) Project Location and Existing Characteristics

##### Project Site

The proposed program area is composed of 4 areas (South, Isthmus, Central, and North) and 17 individual sites (Figure 2). Each area's location and ownership is provided in more detail below:

- **South Area:** The South Area is bounded by the Isthmus and Island Village to the north, industrial and residential development to the east, residential development to the south, and the Pacific Coast Highway to the west. It includes the **Haynes Cooling Channel** owned by the City of Los Angeles Department of Water and Power, along with two small upland parcels owned by the City of Long Beach and the State of California, **State Lands Parcel** site owned by the State of California, the **South LCWA** site owned by the LCWA, the **Hellman Retained** site owned by Hellman Properties, LLC, and the **Los Alamitos Pump Station** and **Los Alamitos Retarding Basin** sites, both owned by the County of Orange Flood Control District. The South area is within the city of Seal Beach with the exception of the Haynes Cooling Channel and Los Alamitos Retarding Basin site which are within both Seal Beach and Long Beach, and Los Alamitos Pump Station site which is within Long Beach. (Assessor's Parcel Numbers: 7237-020-902, 7237-020-900, 7237-020-275, 7237-020-276, 7237-020-280, 7237-020-281, 7237-020-282, 7237-020-282, 0431-603-6, 0431-605-3, 0431-604-5, 0950-106-3, 0950-106-4, 0950-106-7, 0950-106-8, 0950-103-6, 7237-020-277, 7237-020-278, and 7237-020-279)
- **Isthmus Area:** The Isthmus area is bounded by the San Gabriel River and 2<sup>nd</sup> Street to the north, Haynes Cooling Channel to the east and south, and Pacific Coast Highway to the west. It includes the **Callaway Marsh** site owned by the City of Los Angeles Department of Water and Power, **Isthmus LCWA** site owned by the LCWA (surface rights only), **Zedler Marsh** site owned by the LCWA, and **Isthmus Bryant** site owned by Bryant Dakin, LLC. The Isthmus area is within the city of Long Beach. (Assessor's Parcel Numbers: 7237-020-275, 7237-020-276, 7237-020-901, 7237-020-054)
- **Central Area:** The Central area is bounded by 2<sup>nd</sup> Street to the north, the Isthmus to the east and south, and commercial-retail uses at the Marketplace Long Beach development to the west. It includes the **Central LCWA** site owned by the LCWA (surface rights only), **Central Bryant** site owned by Bryant Dakin, LLC, the **Long Beach City Property** site owned by the City of Long Beach, the **Pumpkin Patch** site owned by Lyon Housing Pumpkin Patch, and the **San Gabriel River**. Portions of 2<sup>nd</sup> Street and Shopkeeper Road adjacent to the individual sites are also part of the Central area. **The portion of the San Gabriel River that is located within the program boundary is owned by the LCWA.** The Central area is within the city of Long Beach. (Assessor's Parcel Numbers: 7237-020-901, 7237-020-903, 7237-020-053, 7237-020-044, 7237-020-045, and 7237-020-043)

Note LACFCD  
Easement for O&M



Note that Los Cerritos Channel is owned by LACFD and any potential impacts to channel

- North Area: The North area is bounded by the **Los Cerritos Channel** to the north, Studebaker Road to the east, 2<sup>nd</sup> Street to the south, and Pacific Coast Highway to the west. It includes the **Northern Synergy Oil Field** site and **Southern Synergy Oil Field** site owned by Los Cerritos Wetlands Partners, LLC, and **Alamitos Bay Partners** site owned by Alamitos Bay Partnership, LLC. The North area is within the city of Long Beach. (Assessor's Parcel Numbers: 7237-022-012, 7237-017-010, 7237-017-011, 7237-017-012, 7237-017-013, 7237-017-014, 7237-017-018, and 7237-017-019)

### Existing Land Management and Site Conditions

The existing use of each of the sites in the South, Isthmus, Central, and North program areas are described below. All 17 individual sites within the four program areas support a variety of wetland flora and fauna, including special-status plants and animals, as documented in the *Los Cerritos Wetlands Habitat Assessment Report: Habitat Types and Special Status Species* prepared by Tidal Influence in 2012.

Coordinate w/ LACFCD regarding discharge into SG River

### South Area

The Haynes Cooling Channel is a waterway used by the Haynes Generating Station located north of the program area to bring in water from the Pacific Ocean via seven culverts in the Alamitos Bay Marina to cool the power plant through a method called once-through cooling. **Once the water is used, it is discharged into the San Gabriel River slightly upstream of where the River crosses under 2nd Street.** The Haynes Generating Station is a natural gas and steam power plant that was built in the mid-1960s. The Haynes Generating Station is undergoing a modernization project that would eliminate the use of ocean water to cool the power plant by 2029. The State Lands Parcel site contains the remnant building foundation of what was once a music venue called the Airport Club and Marina Palace. The South LCWA site is currently owned and maintained by the LCWA and contains multiple former sumps, landfills, and contaminated areas from prior oil operations. The Hellman Retained site is an active oil field owned and operated by Hellman Properties, LLC and contains substantial oil operation infrastructure (pipelines, pumps, tanks, and roadways). The Los Alamitos Retarding Basin site is a 30-acre depressed basin surrounded by an earthen berm and access road that receives stormwater runoff and other drainage from a 3,600-acre area in Seal Beach. The site is owned and operated by the County of Orange Flood Control District. **The Los Alamitos Pump Station site includes a pump station, which moves the stormwater runoff from the Los Alamitos Retarding Basin, under the San Gabriel River Levee, and into the San Gabriel River.**

If modification to discharge, coordinate w/ LACFCD

The South Area is adjacent to the Hellman Ranch Trail, Gum Grove Park, and Gum Grove Trail.

### Isthmus Area

The Callaway Marsh and Isthmus Bryant sites are vacant and not currently in use. The Zedler Marsh site is a 12-acre restoration site operated and managed by the LCWA, and is currently being enhanced and restored. The Isthmus LCWA site is an active oil field with oil operation infrastructure, maintained and operated by Signal Hill Petroleum, Inc. who own the mineral rights.

### *Central Area*

The Long Beach City Property site is an active oil field with oil storage tanks, and associated oil production infrastructure, such as pipelines and tanks, which are maintained and operated by Synergy Oil and Gas, LLC. The Central LCWA site is an active oil field with oil operation infrastructure (roadways, wells, power lines, pipelines, and pumps) which are maintained and operated by Signal Hill Petroleum, Inc. who own the mineral rights. The Central Bryant site is a vacant parcel with no oil operations on the surface.

Coordinate w/ LACFD  
for any modification  
of levees or trail

There are levees along the north and south banks of the San Gabriel River within the program boundary. LCWA owns the levees as part of their property that extends from the Central Area into the Isthmus Area (APN #7237-020-901). The Class 1 San Gabriel River Trail runs on the levee on the south bank which extends upstream beyond the program area to the Azusa Wilderness Park located about 38 miles inland.

### *North Area*

The Northern Synergy Oil Field site contains Steamshovel Slough, an area of tidally-influenced salt marsh, tidal channels, and mud flats. Steamshovel Slough contains no active oil operations and is separated from the oil operations areas to the south by an earthen berm approximately 6 feet high and varying expanses of open space. The Southern Synergy Oil Field site is an active oil field with oil production and wells, tank farms, and a network of roads, pipelines, and other oil field-related amenities including the Bixby Ranch Field Office. The oil operation is maintained and operated by Synergy Oil and Gas, LLC. The Alamitos Bay Partners site is an active oil field with oil wells and associated oil production infrastructure, such as pipelines and tanks, which are maintained and operated by the Termo Company.

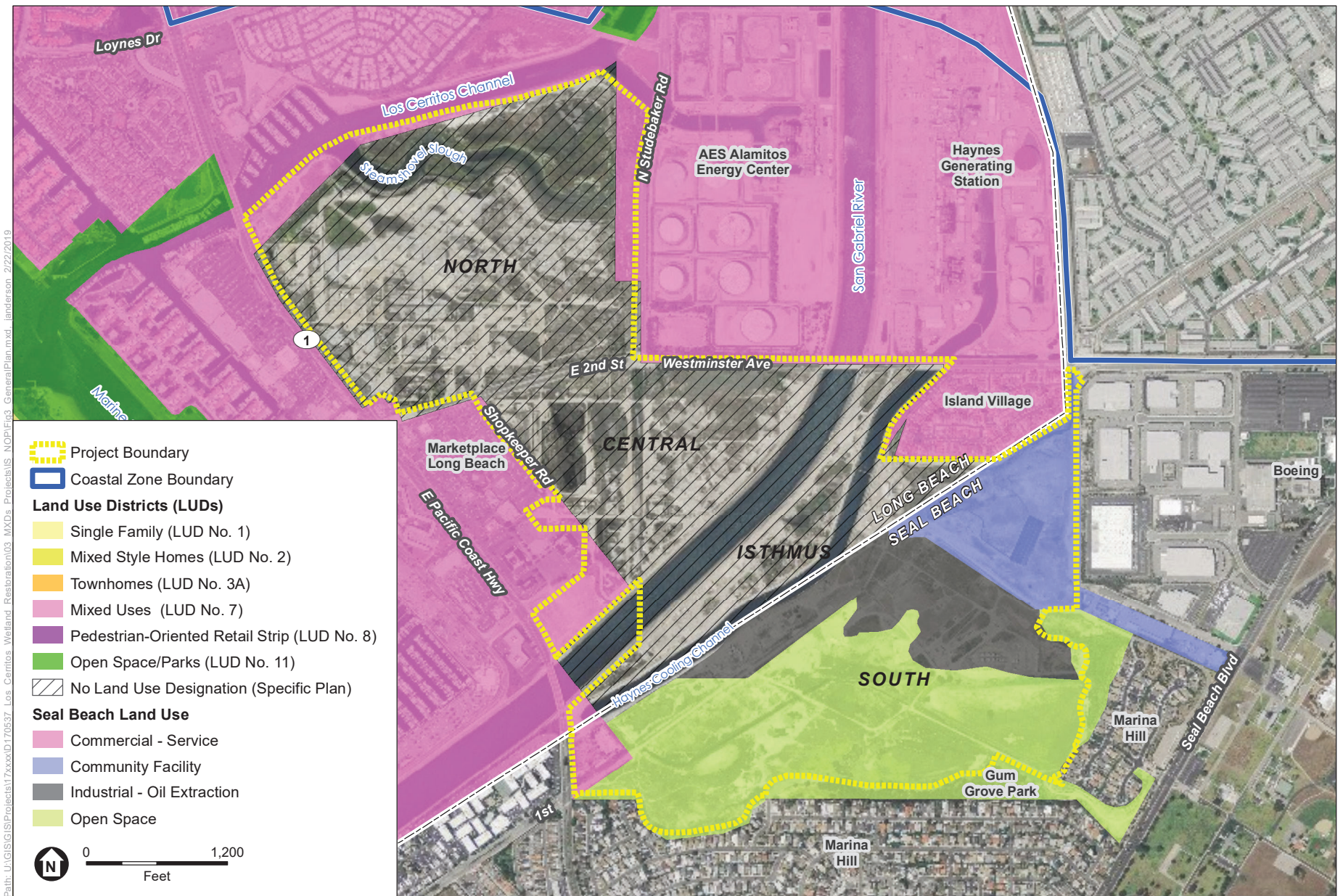
## **e) Land Use and Zoning Designations**

The program area is located entirely within the California Coastal Zone, which means it is subject to the California Coastal Act and the City of Long Beach Local Coastal Program, adopted in 1980.

The Seal Beach General Plan designates the portion of the program area within Seal Beach city boundaries as Community Facilities, Industrial – Oil Extraction, Open Space, and Commercial Service (see **Figure 3, General Plan Land Use Designations**).

According to the Seal Beach zoning map, and as shown in **Figure 4, Zoning Districts**, the properties within Seal Beach are zoned as Specific Plan Regulation, Open Space Natural, and Oil Extraction. The Hellman Ranch Specific Plan applies to the entire portion of the program area within Seal Beach.



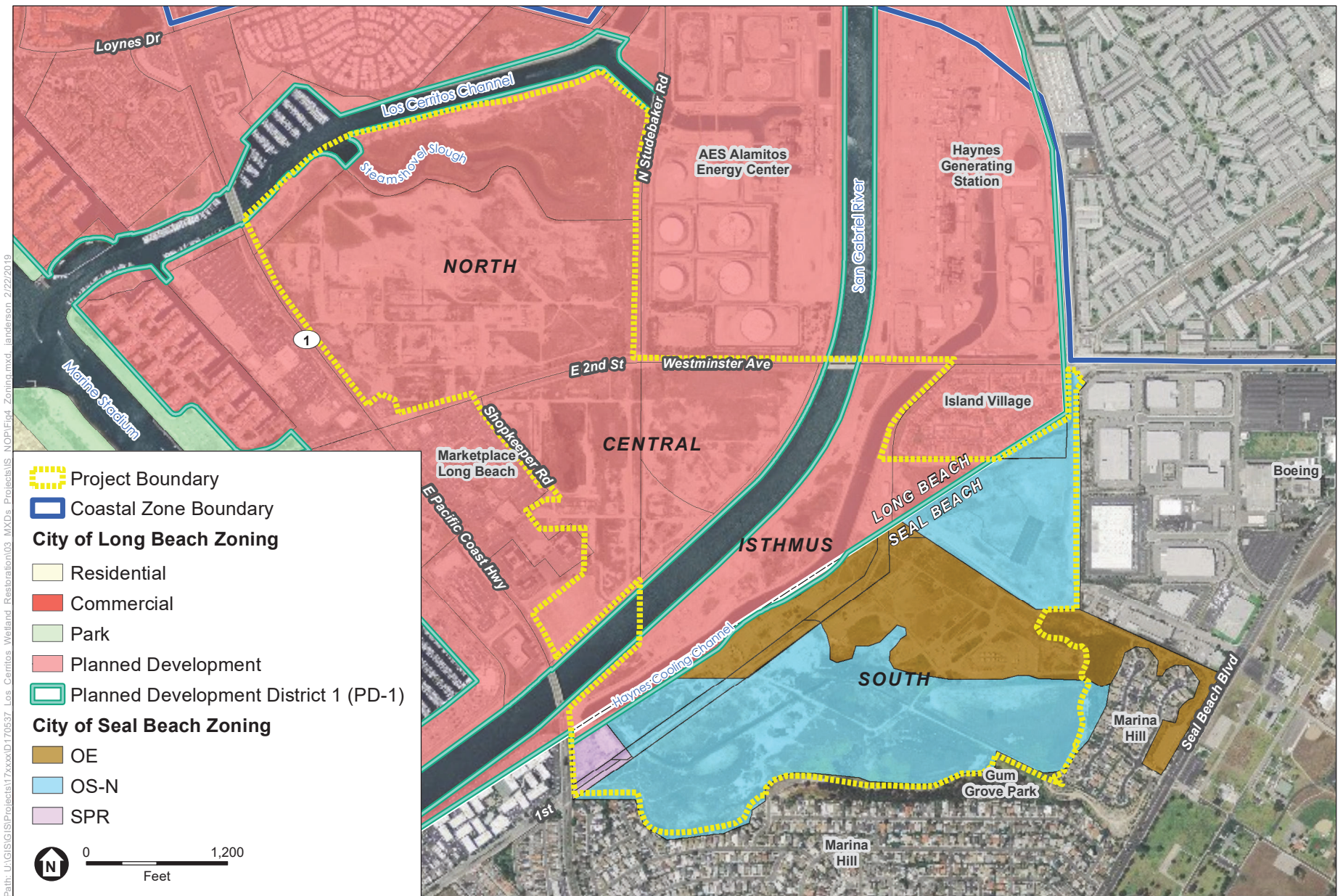


SOURCE: Mapbox, LCWA, City of Long Beach, City of Seal Beach, ESA

Los Cerritos Wetlands Restoration Plan Program EIR

**Figure 3**  
General Plan Land Use Designations





SOURCE: Mapbox, LCWA, City of Long Beach, City of Seal Beach

Los Cerritos Wetlands Restoration Plan Program EIR

**Figure 4**  
Zoning Districts

According to the City of Long Beach General Plan Land Use Designations map, and as shown in Figure 3, the properties within Long Beach are not assigned a specific General Plan Land Use District, with the exception of the Alamitos Bay Partners site and Pumpkin Patch site, and portions of the Northern Synergy Oil Field, Long Beach City Property, Pumpkin Patch, and Callaway Marsh sites which have a designation of Land Use District No. 7, Mixed Uses. The City of Long Beach is currently updating their General Plan and once adopted would change the land use designations to an Open Space PlaceType with a Specific Plan Overlay.

The properties within Long Beach are subject to the South East Area Development and Improvement Plan (SEADIP), a specific plan which zones the program area as Planned Development District 1 (PD-1) (see Figure 4).

The City of Long Beach is in the process of replacing the SEADIP specific plan with the Southeast Area Specific Plan 2060, which would change the zoning of the site and introduce new development standards (setbacks, densities, heights, buffers, etc.) and design guidelines.

Coordinate w/  
LACFCD regarding  
impact resulting  
from proposals and  
construction  
activities

#### f) Proposed Program

##### Overview

The proposed program would restore wetland and upland habitats throughout the program area. This would involve remediation of contaminated soil, grading, revegetation, construction of new public access opportunities (including trails, visitor centers, parking lots, and viewpoints), construction of flood management facilities (including earthen levees and berms, and walls), and modification of existing infrastructure and utilities.

The construction activities would be phased over time as properties become available for acquisition by LCWA. The timing of construction at each site is dependent on multiple variables, including property acquisition, removal of oil infrastructure, wells, and related facilities, availability of funding, and permit approvals. Construction on properties currently under the ownership of LCWA or in the process of being transferred to the LCWA is expected to occur in the **near-term** (within approximately 10 years). Construction on properties that would be connected to or are associated with operation of the Haynes Cooling Channel or that may require more time than the near-term time frame, is expected to occur in the **mid-term** (between approximately 10-20 years), once the channel is decommissioned. The timing of the **long-term** phase depends on decommissioning of existing oil operations and could vary from 20 years (where agreements are already in place) to longer time frames. For oil operations that do not have agreements in place with LCWA, it is expected that overall level of oil and natural gas production would continue until production decreases to below economically viable levels, after which oil production would stop. LCWA considered the possibility of purchasing mineral rights from oil operators, and decommissioning existing oil operations in order to implement wetland restoration on a faster timeline; however, sufficient public funding was not available to pay for the additional cost.



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The description of each of the program areas is broken down into the following elements: ecosystem restoration, flood risk and stormwater management, public access and visitor facilities, infrastructure and utility modification, implementation and restoration process, monitoring and adaptive management, and operation and maintenance activities. An overview of each of these elements is provided below.

### Ecosystem Restoration

Ecosystem restoration includes actions that will restore more natural ecosystem processes (physical and biological) to disturbed habitats within the program area. Restoration of more natural ecosystem processes through actions like grading, modifying tidal connections, and revegetation, will lead to more extensive and higher functioning wetland, transition and upland habitats. Habitat types that would be restored or enhanced within the program area include subtidal channels, intertidal salt marsh, salt marsh-upland transition zone, brackish marsh, freshwater marsh, native grassland, coastal sage scrub, and riparian scrub. Restored habitat distribution and acreages would vary by area.

The restored salt marsh areas would be re-vegetated through a combination of seeding and installation of nursery stock. Successful re-vegetation will likely require soil amendments (to alter soil texture and nutrients), irrigation, and weed control, all under a carefully laid out adaptive management approach. Revegetation activities in non-tidal areas would include removing or controlling invasive plant species and seeding/planting native plant species. Appropriate conditions will need to be restored in order to support target plant communities. Potential disturbances to sensitive habitats and species during operation of the proposed program would be minimized through effective design of public access areas to keep people on trails and out of habitat areas, and predator management. The success of restoration efforts would be measured based on established performance criteria focusing on the abundance and diversity of native vegetation and the wildlife that use Los Cerritos Wetlands.

### Flood Risk and Stormwater Management

The flood risk and stormwater management elements of the proposed program would allow for habitat restoration through improved connection of wetlands to tidal flows while maintaining or improving existing flood risk and stormwater management. Potential flood risk and stormwater management would include modifications to project structures within the program area by removing portions of the existing levee adjacent to the program boundary along the San Gabriel River and constructing new flood risk management levees, restoring the wetland floodplain, and constructing new water-control structures, such as gated culverts, that allow for increased tidal connections. The proposed program would also include modifications to existing operations and maintenance practices for flood risk and stormwater management structures.

Coordinate w/  
LACFCD



### Public Access and Visitor Facilities

Potential public access improvements and visitor amenities would include construction of new pedestrian trails and bike paths, elevated perimeter pedestrian walkways, educational or interpretive features, viewing areas with overlooks, new and improved parking facilities, and visitor centers. These improvements would develop and enhance public access, recreation,

and educational opportunities within the program area, while balancing protection of sensitive habitats.

### Infrastructure and Utility Modification

Potential infrastructure and utility modifications include oil well and associated pipeline abandonment and relocation, and electric and water line relocation. These modifications would allow for increased connectivity of habitat restoration within the program area and protection of existing utilities that are not otherwise abandoned or relocated.

### Implementation and Restoration Process

Implementation would potentially include: clearing and grubbing, grading and soil transport across and off-site, soil remediation, levee lowering and breaching, revegetation, construction of flood risk and stormwater management facilities, access roads/trails, and utility modifications.

### Monitoring and Adaptive Management

The goal of monitoring would be to document trends in habitat development and assess progress toward meeting restoration objectives. Monitoring would focus on the major biotic and abiotic factors that drive habitat development and ecosystem function—in particular, those factors that can be manipulated and managed or those parameters that can be used to gauge habitat development and ecosystem function (Thom et al. 2010).

Successful adaptive management would first require baseline monitoring in order to fill data gaps and refine the restoration design. Consistent with the U.S. Department of Interior Technical Guide for Adaptive Management (2009), an adaptive management plan would be prepared prior to project implementation to track restoration success relative to performance criteria and determine when criteria have been met and the restoration would proceed to its next phase.

### Operation and Maintenance Activities

Ongoing activities to ensure restoration success and management of public access features would potentially include the following:

- Planting and seeding of restored areas after earthmoving is completed
- Vegetation maintenance, irrigation, weeding, and invasive species removal in restored habitats
- Trash removal from restored wetlands and installation of trash booms in flood control channels
- Annual and post-storm event inspection of levees and berms
- Periodic repaving of access roads and trails, repair and replacement of overlook or educational equipment, trash collection, and vandalism repair
- Operation and maintenance of water control structures
- Maintenance of bio-swales
- Creation of a schedule of hours of operation for public use of the new parking lots, trails and visitor centers

Coordinate w/  
LACFCD  
immediately to  
discuss viability

Impacts/  
responsibilities of  
LACFCD?

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## 9. Surrounding Land Uses and Setting

The proposed program is located within the cities of Seal Beach and Long Beach. The city of Seal Beach is within the northwestern portion of Orange County, California. The city of Long Beach is within the southeastern portion of Los Angeles County, California.

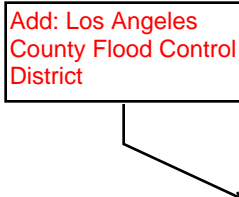
The city of Seal Beach is bounded by the city of Long Beach to the west; the city of Los Alamitos and the neighborhood of Rossmoor to the north; and the cities of Huntington Beach, Westminster and Garden Grove to the east. The Pacific Ocean borders the city of Seal Beach to the south. The U.S. Navy Naval Weapons Station Seal Beach is located within Seal Beach city boundaries to the southeast of the program area.

Long Beach is bounded by the cities of Carson and Los Angeles, the neighborhood of Wilmington, and the Port of Los Angeles to the west; the cities of Compton, Paramount, and Lakewood to the north; and the cities of Hawaiian Gardens, Cypress, Los Alamitos, and Seal Beach to the east. The Pacific Ocean borders the city of Long Beach to the south.

## 10. Other Public Agencies Whose Approval is Required

Subsequent to the preparation of a programmatic EIR, the LCWA would develop more detailed designs that would serve to implement the proposed Restoration Plan. Restoration activities associated with the more detailed design would require discretionary approval from the following agencies. The specific permits/approvals necessary for each project activity will vary depending on the nature and location of the activity.

Add: Los Angeles  
County Flood Control  
District



- Los Cerritos Wetlands Authority
- City of Long Beach
- City of Seal Beach
- City of Los Angeles Department of Water and Power
- Los Angeles County Department of Public Works
- Orange County Public Works
- South Coast Air Quality Management District
- Santa Ana Regional Water Quality Control Board
- Los Angeles Regional Water Quality Control Board
- California Department of Fish and Wildlife
- California State Lands Commission
- California Department of Conservation, Division of Oil, Gas and Geothermal Resources
- California Coastal Commission
- California Coast Guard
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- U.S. National Marine Fisheries Service

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**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

LCWA will be conducting consultation with California Native American tribes who are traditionally and culturally affiliated with the project area pursuant to Public Resources Code section 21080.3.1. LCWA will consult with tribes on the identification of tribal cultural resources within the program area, and in determining significance of any identified tribal cultural resources. If tribal cultural resources meeting the definition provided in Public Resources Code section 21074 are identified, LCWA will consult with tribes in assessing impacts and developing mitigation, consistent with Public Resources Code section 21080.3.2. LCWA will ensure that information submitted to LCWA during the environmental review process is not included in the environmental document or otherwise disclosed without the prior written consent of the tribe that provided the information in accordance with Public Resources Code section 21082.3(c).

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## Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources      | <input checked="" type="checkbox"/> Cultural Resources       | <input checked="" type="checkbox"/> Energy                             |
| <input checked="" type="checkbox"/> Geology/Soils             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials      |
| <input checked="" type="checkbox"/> Hydrology/Water Quality   | <input checked="" type="checkbox"/> Land Use/Planning        | <input checked="" type="checkbox"/> Mineral Resources                  |
| <input checked="" type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing                  | <input checked="" type="checkbox"/> Public Services                    |
| <input checked="" type="checkbox"/> Recreation                | <input checked="" type="checkbox"/> Transportation           | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Signature

Date

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*Back of Signed Determination*

# Environmental Checklist

## Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>I. AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

### a) Have a substantial adverse effect on a scenic vista?

**Potentially Significant Impact.** The existing visual environment mainly includes large expanses of open space, areas developed with oil operations and associated infrastructure, a large stormwater basin, roads and overhead utilities, and channelized waterways. Although restoration of wetlands within the program area would likely improve the visual character and/or quality of the area, the proposed program's potential to have a substantial adverse effect on scenic vistas will be evaluated in the Programmatic Environmental Impact Report (PEIR). Mitigation measures, to the extent necessary and available, will be recommended to reduce potentially significant aesthetic impacts.

### b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**Potentially Significant Impact.** According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System, the nearest eligible scenic highway is State Route 1, also known as the Pacific Coast Highway (PCH). The PCH is located directly west of the program area and is currently designated as an Eligible State Scenic Highway - Not Officially Designated. There are no State-designated scenic highways in the cities of Seal Beach or Long Beach. However, given its proximity to PCH, the proposed program's impacts to Eligible State Scenic Highways, as well as any scenic resources identified in relevant City Plans, will be identified in the

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PEIR. Mitigation measures, to the extent necessary and available, will be recommended to reduce potentially significant aesthetic impacts.

- c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**Potentially Significant Impact** The program is located in a largely urbanized area, surrounded by the Los Cerritos Channel, the AES Alamitos Energy Center and Haynes Generation Station to the north, Pacific Coast Highway and commercial-retail strip mall to the west, residential development to the south, and residential and industrial development to the east, including a Boeing office complex. The San Gabriel River bisects the program area. Although restoration of wetlands within the program area would likely improve the visual character and/or quality of the area, the proposed program's potential to conflict with applicable zoning and other regulations governing scenic quality will be evaluated in the PEIR. Mitigation measures, to the extent necessary and available, will be recommended to reduce potentially significant aesthetic impacts.

- d) **Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?**

**Potentially Significant Impact.** The proposed program would restore wetland habitats throughout the program area, which would involve construction activities for remediation of contaminated soil and groundwater, grading, revegetation, construction of new public access opportunities (including trails, visitor centers, parking lots, and viewpoints), construction of flood management facilities (including earthen levees and berms, and walls), and modification of existing infrastructure and utilities. The proposed program is not expected to create any reflective surfaces or the potential for light/glare during the day. However, some lighting may be needed during construction and maintenance activities, as well as nighttime lighting to provide minimum illumination needed for safety, security and wayfinding for the visitor centers and parking lots. Because the proposed program may include new sources of light, the proposed program's potential to create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area will be evaluated in the PEIR. Mitigation measures, to the extent necessary and available, will be recommended to reduce potentially significant aesthetic impacts.

## References

Caltrans, California Scenic Highway Mapping System Los Angeles County,  
[http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm), accessed  
February 7, 2019.

## Agriculture and Forestry Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>II. AGRICULTURE AND FORESTRY RESOURCES —</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
<b>Would the project:</b>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

**No Impact.** The program area is located within a highly urbanized area primarily used as privately owned or leased oil fields, wetland habitat areas, or a stormwater basin. No farmland, agricultural uses, or related operations are present within the program area or surrounding areas. According to the California Department of Conservation (CDC) Los Angeles County Important Farmland 2016 Map, pursuant to Farmland Mapping and Monitoring Program (FMMP), there are no farmlands located within the vicinity of the program area (CDC, 2016). Therefore, the project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, and no impact would occur, and no mitigation measures are required. This topic will not be evaluated in the PEIR.

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**b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. According to the California Department of Conservation (CDC) Los Angeles County Williamson Act Fiscal Year 2015/2016 Map, the program area is not zoned for agricultural use nor is it subject to a Williamson Act Contract or located within the vicinity of a property subject to a Williamson Act Contract (CDC, 2016). Therefore, the proposed program would not conflict with any zoning for agricultural uses or a Williamson Act Contract and, thus, no impacts would occur. This topic will not be evaluated in the PEIR and no mitigation measures would be required.

**c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

**No Impact.** The program area is largely developed with facilities associated with oil extraction and located in a highly urbanized area. The program area is located entirely within the California Coastal Zone, which means it is subject to the California Coastal Act and the City of Long Beach Local Coastal Program, adopted in 1980. The Seal Beach zoning map designates the program area within the Seal Beach boundaries as Specific Plan Regulation, Open Space Natural, and Oil Extraction. The Hellman Ranch Specific Plan applies to the entire portion of the program area within Seal Beach. According to the City of Long Beach General Plan Land Use Designations map, the portion of the program area within the City of Long Beach boundaries has a zoning designation of Planned Development District 1 (PD-1) within the Southeast Community Plan Area (SEADIP). The City of Long Beach is in the process of replacing the SEADIP specific plan with the Southeast Area Specific Plan 2060, which would change the zoning of the site and introduce new development standards (setbacks, densities, heights, buffers, etc.) and design guidelines. However, given the current zoning and uses, the program area is not expected to be rezoned as forest land or timberland zoning in the Southeast Area Specific Plan 2060. Thus, the program area is not zoned as forest land or timberland, and as such would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land or timberland to non-forest uses. Therefore, no impact would occur, and no mitigation measure would be necessary. This topic will not be evaluated in the PEIR.

**d) Result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** Refer to Response (c), above. This topic will not be evaluated in the PEIR.

**e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?**

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**No Impact.** As discussed above, the program area is not expected to contain farmland, forest land, or timberland. Accordingly, the project would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. The program area is located in a highly urbanized area and is not adjacent to existing farmland or forest lands. Therefore, no impacts would occur, and no mitigation measures would be necessary. This topic will not be discussed in the EIR.

## References

- CDC, Los Angeles County Important Farmland Map,  
<ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, 2016, accessed February 7, 2019.
- CDC, Los Angeles County Williamson Act FY 2015-2016 Map,  
[ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA\\_15\\_16\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf), 2016, accessed February 7, 2019.
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## Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>III. AIR QUALITY —</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. <b>Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

### a) Conflict with or obstruct implementation of the applicable air quality plan?

**Potentially Significant Impact.** The program area is located within the jurisdiction of the South Coast Air Quality Control District (SCAQMD) within the South Coast Air Basin (SCAB), which consists of the urbanized areas of Los Angeles, Riverside, San Bernardino and Orange Counties. SCAQMD is designated as a nonattainment area for national ambient air quality standards (NAAQS) for ozone (O<sub>3</sub>), lead (Pb), and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) and is designated as a maintenance area for particulate matter less than 10 microns in diameter (PM<sub>10</sub>), carbon monoxide (CO) and nitrogen dioxide (NO<sub>2</sub>). The SCAB is designated as a nonattainment area under the California ambient air quality standards (CAAQS) for O<sub>3</sub>, Pb, PM<sub>2.5</sub>, and PM<sub>10</sub>. The SCAQMD and Southern California Association of Governments (SCAG), in cooperation with the California Air Resources Board (CARB) and USEPA, have developed air quality management plans (AQMP) designed to bring the SCAB into attainment of the national and state ambient air quality standards. The latest version of the AQMP was adopted by the SCAQMD Governing Board in March 2017 (SCAQMD, 2016).

The proposed program would involve construction and operation activities for remediation of contaminated soil and groundwater, grading, revegetation, construction of new public access facilities (including trails, visitor centers, parking lots, and viewpoints), construction of flood management facilities (including earthen levees and berms, and walls), and modification of existing infrastructure and utilities. Thus, implementation of the proposed program could result in increases in pollutants and alter long-term local and regional air quality on and in the vicinity of the program area. The proposed program's potential to conflict with or obstruct implementation of the applicable air quality plan will be evaluated in the PEIR. Mitigation measures, to the



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extent necessary and available, will be recommended to reduce potentially significant air quality impacts.

**b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

**Potentially Significant Impact.** Short-term construction activities and long-term operation of the proposed program may generate emissions that could result in an increase of existing emission levels of criteria pollutants and/or contribute to the nonattainment status for these criteria pollutants in the SCAB. Due to the elevated concentrations of air pollutants that currently occur in the SCAB, when combined with past, present, or reasonably foreseeable future projects in the area, the net increase of criteria pollutants could cumulatively contribute to the nonattainment of criteria pollutants in the SCAB, including O<sub>3</sub>, as well as ozone precursor emissions of volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>), and particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>). The generation of these compounds during and after construction could potentially exceed the SCAQMD's significance thresholds for such emissions (including quantitative thresholds for ozone precursors). Operation of the proposed program may result in increased emissions of air pollutants from the potential in increased vehicle trips accessing the proposed program area and operational maintenance activities. The proposed program's potential to result in a cumulative considerable net increase of any criterial pollutant for which the program region is nonattainment under an applicable federal or state ambient air quality threshold will be evaluated in the PEIR. Mitigation measures, to the extent necessary and available, will be recommended to reduce potentially significant air quality impacts.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Impact.** Sensitive receptors are locations where uses or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (such as children and the elderly). Examples of land uses that can be classified as sensitive receptors include residences, schools, daycare centers, parks, recreational areas, medical facilities, rest homes, and convalescent care facilities. Development of the proposed program may have the potential to expose sensitive receptors to substantial concentrations of criteria air pollutants and toxic air contaminants (TACs) as a result of emissions generated during construction. The proposed program's potential to expose sensitive receptors to substantial pollutant concentrations will be evaluated in the PEIR. Mitigation measures will be recommended to reduce potential significant air quality impacts to sensitive receptors.

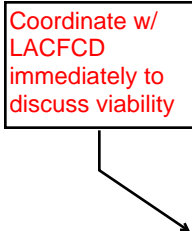
**d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Potentially Significant Impact.** Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD

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Rule 1113 (Architectural Coatings) limits the amount of VOCs from architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB Air Toxics Control Measure (ATCM) that limits diesel-fueled commercial vehicle idling to 5 minutes at any given location, which was adopted in 2004. Program-related construction would also comply with SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with SCAQMD Rules and State measures, construction activities and materials would not result in other emissions that create objectionable odors.

Coordinate w/  
LACFCD  
immediately to  
discuss viability



According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed program would not involve elements related to these types of uses. Trash removal would occur as needed within the restored wetlands. The Los Angeles County Flood Control District operates and maintains trash booms and nets in other flood control channels and a similar boom/net could be installed upstream of the Central Area across the San Gabriel River. If a trash boom/net was installed, the Los Angeles County Flood Control District would inspect the trash net weekly and remove trash from the boom/net as necessary. Although the proposed program is not expected to include any stationary sources or equipment located on-site that would generate objectionable odors, the PEIR will discuss the program's potential to result in other emissions, including odor. Mitigation measures, to the extent necessary and available, will be recommended to reduce potentially significant air quality impacts related to other emissions.

## References

California Air Resources Board (CARB), *Area Designation Maps/State and National*, <http://www.arb.ca.gov/design/adm/adm.htm/>, 2019, accessed February 6, 2019.

## Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>IV. BIOLOGICAL RESOURCES — Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**Potentially Significant Impact.** All 17 individual sites within the four program areas can potentially support special-status species that could be affected under the proposed program. The proposed program's potential to have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or otherwise special-status species in local or regional plans or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to biological resources.

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- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

**Potentially Significant Impact.** Sensitive natural communities are considered rare in the region by the USFWS, CDFW, or local regulatory agencies and are known to provide habitat for special-status plant and wildlife species. Within the program area, sensitive natural communities include riparian, wetland, and limited upland habitats such as pickleweed (*Salicornia pacifica*) mats and black willow (*Salix gooddingii*) thickets. Development of the proposed program would ultimately restore the wetlands within the program area; however, the proposed program's potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community during construction and operation will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to biological resources.

- c) **Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**Potentially Significant Impact.** State or federally protected wetlands or waters in the program area include those protected under the Clean Water Act, Porter-Cologne Water Quality Control Act, California Coastal Act, and Section 1602 of the Fish and Game Code. Aquatic and wetland habitats in the program area such as Steamshovel Slough, mudflats, as well as the tidal channels surrounding the program area, could be removed, filled or otherwise disturbed. While implementation of the proposed program would ultimately restore the wetlands within the program area, the proposed program could have a potentially significant impact on the state or federally protected wetlands during construction and operation. The proposed program's potential to have a substantial adverse effect on state or federally protected wetlands will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to biological resources.

- d) **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

**Potentially Significant Impact.** Implementation of the proposed program may significantly affect habitat linkages (i.e., wildlife and riparian corridors). While the proposed program would ultimately restore the wetlands, the program's potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to biological resources.

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- e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Potentially Significant Impact.** Existing local policies or ordinances protecting biological resources may potentially be impacted by the development of the proposed program. The PEIR will include a review of all relevant policies and ordinances and the proposed program's potential conflict with the City of Seal Beach and the City of Long Beach's policies or ordinances protecting biological resources, and any conflicts with potential Environmentally Sensitive Habitat Area (ESHA) pursuant to the California Coastal Act, will be evaluated in the PEIR.

- f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

**No Impact.** Based on a review of the California Department of Fish and Wildlife California Regional Conservation Plans, there are no Habitat Conservation Plans or other approved habitat conservation plans prepared for the program area (CDFW 2017). Given that the program area is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, no impacts would occur, and no further discussion is needed in the PEIR.

## References

California Department of Fish and Wildlife (CDFW), California Regional Conservation Plans, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, October 2017, accessed February 6, 2019.

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## Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>V. CULTURAL RESOURCES — Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

### a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

**Potentially Significant Impact.** The program boundary totals approximately 503 acres, including areas extensively developed with oil operations and associated infrastructure. A cultural resources assessment will be conducted to identify potential historical resources within the program area, which will include archival research and a site visit. The proposed program's potential to cause a substantial adverse change in the significance of historical resources will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to historical resources.

### b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

**Potentially Significant Impact.** The program area is in the vicinity of known archaeological resources and may have the potential to contain undocumented prehistoric and historic-period archaeological resources. Archaeological evidence from the Channel Islands indicates that the first people migrated down the California Coast as early as 12,000 years ago (Cassidy et al. 2004; Erlandson et al. 2007), with permanent settlements established between 8,000 and 3,000 years ago (Douglass et al. 2015; Glassow et al. 1988; Grenda and Altschul 2002; Koerper et al. 2002; Macko 1998). From 1,000 years before present to approximately 1542 A.D., Los Angeles County and Northern Orange County were occupied by the Gabrielino people (named after the Spanish Mission where many of them were baptized). Approximately 50 major villages were located along the coast and inland prairies. The Gabrielino used the local wetlands, rivers, and streams to hunt and fish, to gather reeds and willows to build homes, and as a reliable water source (McCawley, 1996). Nearby Native American sites are known to be located at California State University Long Beach, Rancho Los Alamitos Historic Ranch, and Heron Point (California Coastal Commission, 2018). Development of the proposed program would result in ground-disturbing activities, such as grading and excavation, that could uncover previously unidentified subsurface archaeological resources. Additional background

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research on the program area, including a records search at the South Central Coastal Information Center (SCCIC), review of historic topographic maps and aerial photographs, site visit, and geoarchaeological study will be conducted. The proposed program's potential to cause an adverse change in the significance of an archaeological resource will be evaluated in the PEIR. Mitigation measures will be recommended to reduce potential significant impacts to cultural resources.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

**Potentially Significant Impact.** Native American burials have been encountered at sites in the vicinity of the program area (California Coastal Commission, 2018). Since the proposed program would require excavation and grading in some portions of the program area, ground-disturbing activities could unearth subsurface human remains. The proposed program's potential to disturb any human remains, including those interred outside of formal cemeteries will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to cultural resources.

## References

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## Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VI. ENERGY — Would the project:</b>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

**Potentially Significant Impact.** The implementation of the proposed program would result in construction and operational and maintenance activities on the site that would increase energy consumption associated with electricity, natural gas and transportation fuel. Although the increase in energy consumption is not anticipated to be wasteful, inefficient, or unnecessary and would comply with existing energy conservation plans, it is recommended that this topic be evaluated further in an PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to energy.

- b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Potentially Significant Impact.** The proposed program would be required to comply with the California Green Building Standards (CALGreen) pursuant to Title 24, Part 11 of the California Code of Regulations for any new development, including the construction of the visitor centers, parking lots, and modification of existing infrastructure and utilities. In conformance with these requirements, the program would be designed to incorporate various energy and resource conservation measures. In addition, the proposed program would implement applicable energy and resource conservation measures such as those described in California Air Resources Board AB 32 Climate Change Scoping Plan and supporting documents. However, further evaluation in the PEIR is required to determine if the proposed program would achieve consistency with state or local plans for renewable energy or energy efficiency. If necessary, mitigation measures will be recommended to reduce potential significant impacts to energy.

## References

None.

## Geology and Soils

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VII. GEOLOGY AND SOILS — Would the project:</b>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving**
- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)**

**Less than Significant Impact.** Seismically-induced surface or ground rupture occurs when movement on a fault deep within the earth breaks through to the surface as a result of seismic activity. Fault rupture almost always follows preexisting faults, which are zones of weakness. Under the Alquist-Priolo Earthquake Fault Zoning Act of 1972, the California State Geologist (CGS) identifies areas in the state that are at risk from surface fault rupture. This requires CGS to establish regulatory zones, known as Alquist-Priolo

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Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps that identify these areas. The program area is located within a trace of the active Newport-Inglewood Fault, as identified by the California Department of Conservation, Earthquake Zones of Required Investigation-Los Alamitos Quadrangle Map (CDC, 1986). Currently, active oil and natural gas operations are located on several properties along the fault and in the project area. Over time, the proposed program would result in the reduction and removal of some of these operations, and the consolidation of others in smaller footprints with modern equipment. The overall surface footprint of oil production operations would be reduced, while the footprint of restored wetland habitat would be increased. The overall level of oil and natural gas production would continue at about current levels until production decreases to below economically viable levels, after which oil production would decrease. The oil and natural gas operations would continue to maintain subsurface pressures by the legally required pumping of produced water back into the production zones to maintain existing pressures.<sup>1</sup> Thus, the oil production operations would not be significantly changed in the short term and would be reduced over the long term. Maintaining subsurface pressures and the long-term reduction of movement of oil, natural gas, and fluids from and back into the subsurface would reduce the potential to initiate movement along the fault, resulting in a beneficial impact and no mitigation measures would be required.

The proposed program consists of wetland habitat restoration. To facilitate the restoration, levees and tidal channels would be removed and constructed as needed to restore the natural tidal functions. Although this action would not directly or indirectly cause fault movement, it is recognized that fault rupture along the Newport-Inglewood Fault could breach a levee and result in the risk of damage to nearby structures or injury to people maintaining or visiting the site. Therefore, for informational purposes, this topic will be evaluated in the PEIR. If needed, mitigation measures will be recommended to reduce potential significant impacts relative to fault rupture.

## **ii) Strong seismic ground shaking?**

**Less than Significant Impact.** The program area is located in the seismically active region of Southern California and the active Newport-Inglewood Fault crosses the program area (CDC, 1986). The program area would be subject to shaking during earthquake events. The level of ground shaking that would be experienced at the program area from the Newport-Inglewood Fault or any other active faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture and propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography and site geology. As discussed above in the criteria on fault rupture, the proposed program would not directly or indirectly cause seismic shaking. The proposed program consists of wetland habitat restoration that would include the construction of levees and tidal channels as needed to restore the natural tidal functions. Although this

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<sup>1</sup> The extraction of oil also results in the extraction of saline water, referred to as produced water. To maintain the existing pressures in the subsurface and prevent subsidence, the produced water is injected back into the production zone.

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action would not directly or indirectly cause a seismic event, it is recognized that seismic shaking could breach a levee and result in the risk of damage to nearby structures or injury to people. Therefore, for informational purposes, the proposed program's potential to be affected by strong seismic ground shaking will be evaluated in the PEIR. If needed, mitigation measures will be recommended to reduce potential significant impacts to geology and soils.

**iii) Seismic-related ground failure, including liquefaction?**

**Less than Significant Impact.** Liquefaction is a form of earthquake induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. According to the California Department of Conservation, the program area is located in Seismic Hazard Zone for liquefaction (CDC, 1999). As discussed above, the proposed program would not directly or indirectly cause seismic shaking or seismic-induced ground failure, such as liquefaction. The proposed program consists of wetland habitat restoration that would include the construction of levees and tidal channels as needed to restore the natural tidal functions. Although this action would not directly or indirectly cause a seismic-induced ground failure, it is recognized that a seismic-induced ground failure could breach a levee and result in the risk of damage to nearby structures or injury to people. Therefore, for informational purposes, the proposed program's potential for seismic-induced ground failure, including liquefaction, will be evaluated in the PEIR. If needed, mitigation measures will be recommended to reduce potential significant impacts to geology and soils.

**iv) Landslides?**

**No Impact.** The program area is located in an area of relatively flat topography, with little likelihood of being subject to landslides or earthquake-induced landslides. According to the CDC, the program area is not expected to be located within a State-designated hazard zone for landslides under the Seismic Hazards Zoning Act of 1990 (CDC 2017). Therefore, no impact would occur. Therefore, no further discussion is warranted, and this topic will not be evaluated in the PEIR.

**b) Result in substantial soil erosion or the loss of topsoil?**

**Potentially Significant Impact.** The proposed program would restore wetland habitats throughout the program area, which would involve grading that could potentially disturb native soil and expose the soil to erosion. The proposed program's potential to result in substantial soil erosion or the loss of topsoil will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to geology and soils.

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- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

**No Impact.** Impacts related to liquefaction and landslides are addressed above in Responses a.iii and a.iv, respectively. Lateral spreading results from earthquake-induced liquefaction, causing landslides associated with gentle slopes that flow laterally, like water. Land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of sediments, causing the land to subside. When water is withdrawn the sediments collapse on themselves. The program area lies in a relatively flat topography where lateral spreading and subsidence and collapse are unlikely to occur. Therefore, no impact would occur. Therefore, no further discussion is warranted, and this topic will not be evaluated in the PEIR.

- d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Potentially Significant Impact.** Expansive soils are fine-grained soils (generally high plasticity clays) that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of a highly expansive soil can result in severe distress to structures constructed on or against the soil. There is a potential for expansive soils to exist within the program area given the presence of fine-grained soils deposited in the currently and previously existing wetlands area and its location near waterways. The proposed program's potential to be located on expansive soil creating direct or indirect substantial risks to life or property will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to geology and soils.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No Impact.** The proposed program would not be expected to involve the use of septic tanks or alternative water disposal systems. Implementation of the proposed program is anticipated to connect to the City's existing sewer lines and wastewater disposal systems. Therefore, no impact would occur. Therefore, no further discussion is warranted, and this topic will not be evaluated in the PEIR.

- f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Potentially Significant Impact.** No paleontological resources are known to be located within the program area, but there are records of vertebrate fossil localities from older Quaternary deposits near the program area (Rieboldt, 2016). Portions of the program area are underlain by Artificial Fill and Undivided Young Alluvial Fan and Channel Deposits

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(Saucedo et al. 2003). Artificial Fill has no paleontological sensitivity. The Undivided Young Alluvial Fan and Channel Deposits have low paleontological sensitivity in the uppermost layers; however, these deposits increase in age with depth and fossil-bearing sediments may be encountered in deeper excavations (Rieboldt, 2016). The project would require excavation and grading in some portions of the site and ground-disturbing activities could unearth undocumented subsurface paleontological resources. Additional research will be conducted to assess the potential for the proposed project to encounter paleontological resources, which will include a database locality search at the Natural History Museum of Los Angeles County and a review of geologic maps. The proposed project's potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to paleontological resources.

## References

- CDC, Earthquake Fault Zones and Seismic Hazard Zones Map: Los Alamitos Quadrangle, [http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/LOS\\_ALAMITOS\\_EZRIM.pdf](http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/LOS_ALAMITOS_EZRIM.pdf), 1989 and 1999, February 9, 2019.
- CDC, CGS Information Warehouse: Landslides, <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>, accessed February 7, 2019.
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## Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VIII. GREENHOUSE GAS EMISSIONS —</b>				
<b>Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

### a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

**Potentially Significant Impact.** Greenhouse gas (GHG) emissions emitted by human activity are implicated in global climate change or global warming. The GHGs defined in State law are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). The temporary construction activities associated with the proposed program, which would involve operation of heavy off-road equipment, on-road trucks (for deliveries and hauling), construction worker commute trips, as well as visitor trips during operations would generate GHGs. The proposed program may include potential carbon sequestration in the form of additional net new vegetation and sequestration in restored salt marsh soils. As discussed previously in the Proposed Program Overview, potential infrastructure modifications include oil well and associated pipeline abandonment and relocation. The decommissioning of existing oil operations could vary from 10 years (where agreements are already in place) to longer time frames. For oil operations that do not have agreements in place with LCWA, it is expected that overall level of oil and natural gas production would continue at about current levels until production decreases to below economically viable levels, after which oil production would stop. LCWA considered the possibility of purchasing mineral rights from oil operators, and decommissioning existing oil operations in order to implement wetland restoration on a faster timeline; however, sufficient public funding was not available to pay for the additional cost. As decommissioning of the existing oil operations would occur over time, the existing site GHG emissions would decrease. Nonetheless, implementation of the proposed program would result in the generation of GHG emissions that may directly or indirectly have potential significant impacts. Potential impacts associated with GHG emissions generated during construction and operation of the proposed program will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant GHG impacts.

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**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Potentially Significant Impact.** The California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32) requires California Air Resource Board (CARB) to design and implement emissions limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing an approximate 25 percent reduction in emissions). The proposed program has the potential to increase GHG emissions and as such, has the potential to result in levels of emissions that may conflict with applicable local air quality/greenhouse gas plans and policies. The PEIR will discuss the applicable plans, policies and regulations adopted for the reduction of GHG emissions and determine whether the proposed program may have the potential to conflict with AB 32 and other regulations adopted for the purpose of reducing GHG emissions. If necessary, mitigation measures will be recommended to reduce potential significant GHG impacts.

## **References**

California Legislative Information. Division 25.5. California Global Warming Solutions Act of 2006. Available at [http://leginfo.ca.gov/faces/codes\\_displayexpandedbranch.xhtml?lawCode=HSC&division=25.5.&title=&part=3.&chapter=&article=&goUp=Y](http://leginfo.ca.gov/faces/codes_displayexpandedbranch.xhtml?lawCode=HSC&division=25.5.&title=&part=3.&chapter=&article=&goUp=Y); accessed on March 6, 2019.

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## Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>IX. HAZARDS AND HAZARDOUS MATERIALS — Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

### a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Potentially Significant Impact.** The proposed program would restore wetland habitats throughout the program area, which would involve construction activities for remediation of contaminated soil and groundwater, extensive grading, revegetation, construction of new public access opportunities (including trails, visitor centers, parking lots, and viewpoints), construction of flood management facilities (including earthen levees and berms, and walls), and modification of existing infrastructure and utilities.

Implementation of the proposed program's short-term construction activities would involve transport, use, and disposal of hazardous materials such as solvents, oils, grease, and cleaning fluids. In addition, hazardous materials may be needed for fueling and servicing construction equipment in the program area. The proposed program's potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials will be evaluated in the PEIR. If

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necessary, mitigation measures will be recommended to reduce potential significant hazardous impacts.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Potentially Significant Impact.** Construction and operation of the proposed program may include the accidental release of hazardous materials associated with the remediation of contaminated soil and groundwater in areas with former oil fields. There are certain hazards associated with petroleum production operations including, but not limited to spills, blowouts, fires, and explosions (OSHA, 2019). The proposed program's potential to create a significant hazard to the public or environment involving the release of hazardous materials into the environment will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant hazardous impacts.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Potentially Significant Impact.** The nearest existing schools to the program area are Rosie the Riveter Charter High School, located approximately 0.25-mile northeast of the program area on 690 Studebaker Road in Long Beach; Seal Beach Playgroup Preschool, located 0.35 mile west of the program area on 151 N Marina Drive in Seal Beach; J.H. McGaugh Elementary School, located approximately 0.4-mile south of the program area on 1698 Bolsa Avenue in Seal Beach, and Charles F. Kettering Elementary School, located approximately 0.7-mile north of the program area on 550 Silvera Avenue in Long Beach. No new schools are proposed in the vicinity of the program area. Given the proposed program's proximity to Riveter Charter High School, the proposed program's potential to emit hazardous emissions or handle hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant hazardous impacts.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**Potentially Significant Impact.** California Government Code Section 65962.5 requires the compiling of lists of the following types of hazardous materials sites: hazardous waste facilities, hazardous waste discharges for which the State Water Quality Control Board (SWQCB) has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. Given that large portion of the program area have or are actively used as oil operating facilities, the proposed program's potential to be located on a site which is

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included on a list of hazardous materials sites pursuant to Government Code Section 65962.5 will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant hazardous impacts.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

**Less than Significant.** The nearest public use airport is the Long Beach Airport, located approximately 4 miles northwest of the program area, at 4100 Douglas Drive in Long Beach. According to the Los Angeles County Airport Land Use Commission Airports Interactive Map, the program area is not within the Long Beach Airport Influence Area (Los Angeles County, 2019). The program area is located within the Airport Environs Land Use Plan (AELUP) for the Joint Forces Base Los Alamitos, which is a federally owned and operated private airport facility approximately 2.5 miles northeast from the program area (Orange County, 2019). However, implementation of the proposed program is not anticipated to significantly increase the population in the program area or result in an aircraft safety hazard or excessive noise due to the program area's distance from the existing airport. Note that the proposed program would not result in the construction of structures that could intersect flight paths. Therefore, the impact would be less than significant. Given the proposed program is located within the AELUP for the Joint Forces Base Los Alamitos, the proposed program's potential to result in a safety hazard or excessive noise for people residing or working in the program area will be evaluated in the PEIR but will result in a less than significant impact. No mitigation measures will be necessary.

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** the City of Seal Beach Emergency Operations Plan provides emergency response and evacuation procedures for the city in lieu of firm routes of evacuation. These procedures are based on the number of people to be evacuated, the road capacity, and which roads may be blocked or have their capacity reduced by disaster conditions (City of Seal Beach, 2017). Similarly, the City of Long Beach General Plan Public Safety Element does not establish firm routes of evacuation, rather it provides emergency response and emergency evacuation procedures for the City based on availability of through streets, multiple access routes and bridges depending on the disaster and the street conditions at the time (City of Long Beach, 1975). The proposed program would not expect to stage or store construction materials or construction equipment on public roadways. The program would not propose any public road closures or rerouting of the existing public roadway network. Although the proposed program may generate traffic trips during construction and operation, the traffic trips would be minimal and would not interfere with an adopted emergency response plan. Therefore, the program would not substantially impair an adopted emergency response plan or emergency evacuation plan,

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and no impact would occur, and no mitigation measures are required. This topic will not be evaluated in the PEIR.

**g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**Potentially Significant Impact.** Although the program area is located in a highly urbanized area, there are wetlands located within the area that have been subject to wildfires, therefore, the proposed program's potential to expose people or structures, directly or indirectly, to significant risk or loss, injury or death involving wildland fires will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant hazardous impacts.

## References

- City of Long Beach, *General Plan Public Safety Element*, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2545>, 1975, accessed February 7, 2019.
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- Occupational Safety and Health Administration, *Safety Hazards with Oil and Gas Extraction Activities*, <https://www.osha.gov/SLTC/oilgaswelldrilling/safetyhazards.html>, accessed February 7, 2019.
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## Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>		<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>X. HYDROLOGY AND WATER QUALITY — Would the project:</b>					
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i)	result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii)	create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv)	impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d)	In flood hazard, tsunami, or seiche zones, risk or release of pollutants due to project inundation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Address impacts to  
LACFCD

## Discussion

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

**Potentially Significant Impact.** Construction activities associated with the proposed program, including clearing and grubbing, grading, excavation, and revegetation, could introduce sediment and other pollutants to surface water or groundwater, potentially impacting water quality and/or violating surface water and groundwater quality standards or waste discharge requirements. Operational activities of the proposed program, such as vegetation maintenance and periodic maintenance of access roads and trails, also have the potential to introduce sediment and other pollutants to surface water or groundwater, thereby impacting water quality such that water quality standards or waste discharge requirements are violated. Post-restoration, the new flow patterns could increase erosion from the wetlands during a large storm event, which could re-suspend sediment and potential constituents such as metals (e.g., copper, zinc, silver, and lead) and organic compounds (e.g., PAHs, pesticides, and PCBs) within the estuary. Additionally, post-

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restoration, contaminated water and sediment from the watershed could be transported into the restored marsh resulting in areas of accumulated contaminated sediments. Lastly, water quality degradation could occur at ocean disposal sites if excavated program site sediments are placed there. The proposed program's potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

**b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**Potentially Significant Impact.** The proposed program would involve grading and excavation and, depending on the depth to groundwater, may require dewatering. While dewatering would not likely remove a substantial amount of groundwater from the basin, further analysis is necessary to determine its potential impacts to groundwater supply. The proposed program would add impervious surfaces to the program area, including bike paths, viewing areas with overlooks, parking facilities, and visitor centers, thereby reducing the potential ground surface area capable of groundwater recharge. The increase of the extent of tidal inundation could increase infiltration of salt water into the groundwater table resulting in the inland advancement of sea water intrusion. The proposed program's potential to decrease groundwater supplies or interfere substantially with groundwater recharge such that the program may impede sustainable groundwater management of the basin will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

**c) Substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner that would:**

**i) result in substantial erosion or siltation on- or off-site?**

**Potentially Significant Impact.** The existing drainage pattern of the proposed program area is determined by a variety of factors, including its topography, soil type, vegetation cover, and impervious surface cover. Proposed program construction activities, including clearing, grubbing, grading, soil remediation, and revegetation could temporarily alter drainage patterns such that substantial erosion or siltation occurs either on- or off-site. Once operational, the proposed program would permanently alter the existing drainage pattern of the program area through the lowering and breaching of existing levees, as well as the installation of new levees, berms, and water control structures. Permanent drainage pattern alterations could also result in erosion or siltation on- or off-site. Erosion could result in significant loss of habitat and/or levee destabilization. The proposed program's potential to substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on- or off-site,

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will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

**ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**

**Potentially Significant Impact.** Permanent drainage pattern alterations could result in increased flooding on- or offsite. The proposed program's potential to substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which could result in flooding on- or offsite, will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

**iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Potentially Significant Impact.** The existing drainage pattern of the proposed program area is determined by a variety of factors, including its topography, soil type, vegetation cover, and impervious surface cover. The proposed program area drains via surface runoff to the San Gabriel River and the Los Cerritos Channel, both of which are considered part of the Los Angeles County storm drain system (LADPW, 2019). Proposed program construction activities, including clearing, grubbing, grading, soil remediation, and revegetation could temporarily alter drainage patterns such that stormwater drainage system capacity is exceeded. Construction activities also have the potential to result in polluted runoff. Once operational, the proposed program would permanently alter the existing drainage pattern of the program area through the lowering and breaching of existing levees, as well as the installation of new levees, berms, and water control structures. Permanent drainage pattern alterations could also exceed stormwater drainage system capacities. As discussed in Impact (a), the proposed program has the potential to violate water quality standards during construction and operation; therefore, the proposed program has the potential to introduce pollutants to surface waters and generate sources of polluted runoff. The proposed program's potential to substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

**iv) impede or redirect flood flows?**

**Potentially Significant Impact.** The existing drainage pattern of the proposed program area is determined by a variety of factors, including its topography, soil type, vegetation cover, and impervious surface cover. Proposed program construction activities, including clearing, grubbing, grading, soil remediation, and revegetation could temporarily alter

drainage patterns such that flood flows are impeded or redirected. Once operational, the proposed program would permanently alter the existing drainage pattern of the program area through the lowering and breaching of existing levees, as well as the installation of new levees, berms, and water control structures. Permanent drainage pattern alterations could also impede or redirect flood flows. The proposed program's potential to substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner that impedes or redirects flood flows, will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

**d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

Flood Zone A and

**Potentially Significant Impact.** The majority of the proposed program area is located within Flood Zone X, which is designated as an area of reduced flood risk due to levees. Some portions of the proposed program areas are located within Flood Zone A, meaning they have a 1% annual chance of flooding. A small segment of the program area is located within Flood Zone AE, which has a 1% annual chance of flooding at 9 feet NAVD (FEMA, 2019). However, increasing on-site flooding is one of the primary goals of the restoration and a desired beneficial effect of reconnecting the floodplain. Portions of the Central Area and North Area are located in an identified tsunami inundation area (State of California and Los Angeles County, 2009). The proposed program area is located adjacent to two partially enclosed bodies of water, including the San Gabriel River and Los Cerritos channel, and would be creating additional areas that would be inundated and is thus at risk for seiche. As discussed in Impact (a), the proposed program has the potential to violate water quality standards during construction and operation and could thus release pollutants if inundated by tsunami or seiche. The proposed program's potential to risk release of pollutants due to program inundation in tsunami or seiche zones will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Potentially Significant Impact.** The proposed program is located within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB), and therefore must meet the requirements of the LARWQCB Water Quality Control Plan (or Basin Plan) for the Coastal Watersheds of Los Angeles and Ventura Counties. The Basin Plan designates beneficial uses for surface water and groundwater, sets water quality objectives that must be attained or maintained, and describes implementation programs to protect all waters within its jurisdiction. As described in Impact (a), the proposed program has the potential to degrade water quality during construction and operation. Therefore, the proposed program could conflict with the Basin Plan. The proposed program's potential to conflict with or obstruct implementation of a water quality control

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plan will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

The proposed program site is underlain by three groundwater basins. The Coastal Plain of Los Angeles (Central) and the Coastal Plain of Los Angeles (West Coast) are designated as very low priority groundwater basins by the State, while the Coastal Plain of Orange County is designated as a medium priority groundwater basin by the State (DWR, 2018), but is not critically overdrafted (DWR, 2019). The State of California plans to manage all high and medium priority groundwater basins per a groundwater management plan by January 31, 2022 (LACWD, 2019). As described in Impact (b), the proposed program has the potential to degrade groundwater quality during construction and operation. Therefore, the proposed program has the potential to conflict with implementation of a sustainable groundwater management plan. The proposed program's potential to conflict with or obstruct implementation of a sustainable groundwater management plan will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts.

## References

- State of California Department of Water Resources (DWR), 2018. Statewide Map of 2018 SGMA Basin Prioritization Results, December 17, 2018. Available at [https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Basin-Prioritization/Files/2018-SGMA-Basin-Prioritization-Results\\_Dec17\\_2018\\_tabloid.pdf?la=en&hash=0B983B16080967D1FB3203032B8D223953225DBD](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Basin-Prioritization/Files/2018-SGMA-Basin-Prioritization-Results_Dec17_2018_tabloid.pdf?la=en&hash=0B983B16080967D1FB3203032B8D223953225DBD); accessed on February 22, 2019.
- DWR, 2019. "Bulletin 118 Groundwater Basins Subject to Critical Conditions of Overdraft—Update based on 2018 Final Basin Boundary Modifications," published February 11, 2019. Available at <https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Critically-Overdrafted-Basins/Files/2018CODBasins.pdf?la=en&hash=3014D2F2299AA503C469D41BBC0E8DCFCE0267F8>; accessed on February 22, 2019.
- Federal Emergency Management Agency (FEMA), 2019. "FEMA Flood Map Service Center: Search By Address." Available at <https://msc.fema.gov/portal/search>; accessed on February 22, 2019.
- Los Angeles County Department of Public Works (LADPW), 2019. "Los Angeles County Storm Drain System." Available at <https://dpw.lacounty.gov/fcd/StormDrain/index.cfm>; accessed on February 22, 2019.
- Los Angeles County Waterworks District (LACWD), 2019. "Sustainable Groundwater Management Act." Available at <https://dpw.lacounty.gov/wwd/web/about/SGMA.aspx>; accessed on February 22, 2019.
- State of California and Los Angeles County, 2009. Tsunami Inundation Map for Emergency Planning: Los Alamitos Quadrangle, Seal Beach Quadrangle. March 1, 2009. Available at [https://www.conservation.ca.gov/cgs/Documents/Tsunami/Maps/Tsunami\\_Inundation\\_LosA;lamitosSealBeach\\_Quads\\_LosAngeles.pdf](https://www.conservation.ca.gov/cgs/Documents/Tsunami/Maps/Tsunami_Inundation_LosA;lamitosSealBeach_Quads_LosAngeles.pdf); accessed on February 22, 2019.

## Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XI. LAND USE AND PLANNING —</b> <b>Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

### a) Physically divide an established community?

**Less Than Significant.** The program area contains large expanses of open space, oil operations and associated facilities and infrastructure, a large stormwater basin and pump station, roads and overhead utilities, and waterways. The program is located in a largely urbanized and generally built out area with a fully developed roadway system, surrounded by the Los Cerritos Channel, the AES Alamitos Energy Center and Haynes Generation Station to the north, Pacific Coast Highway and commercial-retail strip mall to the west, residential development to the south, and residential and industrial development to the east, including a Boeing office complex. The San Gabriel River bisects the program area. The proposed program would restore wetlands within the program area and construct new public access opportunities that would increase access through/along the program area. Although the program is not expected to physically divide an established community, the proposed program's relationship to adjacent existing uses will be addressed in the PEIR.

### b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**Potentially Significant Impact.** The program area is located entirely within the California Coastal Zone, which means it is subject to the California Coastal Act and the City of Long Beach Local Coastal Program, adopted in 1980.

The Seal Beach General Plan designates the portion of the program area within Seal Beach city boundaries as Community Facilities, Industrial – Oil Extraction, Open Space, and Commercial Service. The Seal Beach zoning map designates the program area within the Seal Beach boundaries as Specific Plan Regulation, Open Space Natural, and Oil Extraction. The Hellman Ranch Specific Plan applies to the entire portion of the program area within Seal Beach.

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According to the City of Long Beach General Plan Land Use Designations map, the majority of the program area within Long Beach is not assigned a specific General Plan Land Use District, with the exception of the Alamitos Bay Partners site, and portions of the Long Beach Property and Callaway Marsh sites which have a designation of Land Use District No. 7, Mixed Uses. The City of Long Beach is currently updating their General Plan and once adopted would change the land use designations of the properties within Long Beach to an Open Space PlaceType with a Specific Plan Overlay. The portion of the program area within the City of Long Beach boundaries has a zoning designation of Planned Development District 1 (PD-1) within the Southeast Community Plan Area (SEADIP). The City of Long Beach is in the process of replacing the SEADIP specific plan with the Southeast Area Specific Plan 2060, which would change the zoning of the site and introduce new development standards (setbacks, densities, heights, buffers, etc.) and design guidelines.

The proposed program's potential to conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the program will be evaluated in the PEIR.

## References

None.

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## Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XII. MINERAL RESOURCES — Would the project:</b>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**Potentially Significant Impact.** The program area is largely developed with past and present oil fields. Development of the proposed program would result in the eventual removal and abandonment per DOGGR standards of the existing oil wells and restoration of the wetlands. When completed, the proposed program would preclude the ability in the future to extract subsurface resources from the program area. Because the Los Cerritos Restoration Plan is a long-term program that would be implemented in phases, and oil resources are located in vast subsurface deposits that can be withdrawn from various locations, the program is not expected to prevent the loss of availability of a known mineral resource of value to the region and state. However, the proposed program's impacts on the ability to extract a known mineral resource that is of value to the region and the state will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to mineral resources.

- b) **Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

**Potentially Significant Impact.** According to the California Geological Survey, the program area has been in an area identified as a Mineral Resource Zone 3 (MRZ-3), which indicates the area contains mineral deposits the significance of which cannot be evaluated from available data (CGS, 1982). The program's potential to result in the loss of availability of a locally important mineral resource recovery site will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to mineral resources.

## References

California Geological Survey (CGS), *Generalized Aggregate Resource Classification Map San Gabriel Valley and Adjacent Production –Consumption Regions*, [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR\\_143/PartIV/Plate\\_4-1.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/Plate_4-1.pdf), 1982, accessed February 8, 2019.

## Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIII. NOISE — Would the project result in:</b>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Potentially Significant Impact.** The program area is within a predominantly urbanized area that contains various sources of noise, including noise associated with traffic from roadways and noise from maintenance activities and other noises associated with the operation of oil fields. During program-related construction activities, the use of heavy-duty equipment would generate noise on a temporary basis. The proposed program may generate additional vehicle trips from the establishment of the visitor centers and public access enhancements that could contribute to noise levels on a permanent basis. The proposed program's potential to result in exposure to noise levels in excess of standards established in the Seal Beach and Long Beach General Plans, noise ordinances, or applicable standards of other agencies will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to noise.

- b) **Generation of excessive groundborne vibration or groundborne noise levels?**

**Potentially Significant Impact.** The proposed program would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. The proposed program's potential to result in the generation of excessive vibration or groundborne noise levels during construction and operation will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to noise.

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- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**Potentially Significant Impact.** The program area is not located within the vicinity of a public airport or public use airport. However, the Boeing Seal Beach (rooftop) Heliport is located within the program area. Further, the proposed site is located within the airport influence area of the Joint Forces Training Base Los Alamitos. Therefore, the proposed program's potential to expose people working in the program area (at the proposed visitor centers or as part of wetland restoration maintenance activities) to excessive noise due to proximity to a private airstrip will be evaluated in the PEIR. If necessary, mitigation measures will be recommended to reduce potential significant impacts to noise.

## References

None.

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## Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIV. POPULATION AND HOUSING — Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**No Impact.** The proposed program would provide temporary new employment to the area during the construction activities for remediation of contaminated soil and groundwater, extensive grading, revegetation, construction of new public access opportunities (including trails, visitor centers, parking lots, and viewpoints), construction of flood management facilities (including earthen levees and berms, and walls), and modification of existing infrastructure and utilities. Construction jobs are anticipated to be filled by residents in the local area or by commuters within the larger Los Angeles Metropolitan Area.

Employment opportunities during operation of the proposed program would be mainly maintenance workers and operation of the visitors' centers and volunteers; these are not anticipated to directly increase the population or housing in the area, as positions are anticipated to be filled by local residents or regional commuters.

Indirect growth from extension of roads and infrastructure would not be anticipated, as the proposed program would not add any new roadways and would be served by existing infrastructure with minor proposed upgrades and connections to accommodate the proposed program.

Therefore, the program would not induce substantial unplanned population growth in an area, either directly or indirectly, and no impact would occur, and no mitigation measures are required. This topic will not be evaluated in the PEIR.

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**b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** The proposed program is not sited on lands that contain people or housing units. On occasion, homeless individuals camp in the program area. The Cities of Seal Beach and Long Beach actively work on an ongoing basis with homeless individuals to identify appropriate shelters off-site. Therefore, implementing the proposed program would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. The proposed program's potential to displace substantial numbers of housing units will not be evaluated in the PEIR.

## **References**

None.

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## Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XV. PUBLIC SERVICES — Would the project:</b>				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:**

### i) Fire protection?

**Potentially Significant Impact.** Local fire protection and prevention services (and paramedic services) within the program area would be provided by the City of Long Beach Fire Department (LBFD) and the Orange County Fire Authority (OCFA) (City of Long Beach, 2016). New development within the proposed program would be designed to meet modern fire safety codes, including access requirements and fire suppression and emergency response systems. The LBFD and OCFA would check and review site design plans for compliance with appropriate safety codes prior to construction within their jurisdictions. Implementation of the proposed program would increase the daytime visitor and employee population. The proposed program's potential to adversely impact fire protection services will be evaluated in the PEIR.

### ii) Police protection?

**Potentially Significant Impact.** Police protection and emergency services within the program area would be provided by the Seal Beach Police Department and Long Beach Police Department (LBPD). Implementation of the proposed program would increase the daytime visitor and employee population. The proposed program's potential to adversely impact police protection services will be evaluated in the PEIR.

### iii) Schools?

**No Impact.** The proposed program would not include the development of any residential land uses. However, during construction of the proposed program, it is expected that most of these workers would live in the region and would commute to the program area from where their children are already enrolled in school. Even if these workers came from out of the area, they would likely return to their out-of-town residences once the facilities were built and would not take their children out of their current schooling situation. Therefore, substantial temporary increases in population that would adversely affect local school populations are not expected. During operation of the proposed program, the number of employees is not expected to increase significantly over existing operations, and no impact on schools is anticipated. The proposed program's potential to adversely impact schools will not be evaluated in the PEIR.

### iv) Parks?

**Potentially Significant Impact.** Recreational facilities and programs in the City of Seal Beach are provided by the Community Services and Recreation Department and in the City of Long Beach area by Long Beach Parks, Recreation and Marine Department (PRM). Within the City of Seal Beach there are 18 parks, four community centers, one tennis center, one gymnasium, and one aquatics facility (City of Seal Beach, 2013). Within the City of Long Beach there are 170 parks with 26 community centers, two historic sites, two major tennis courts and five golf courses (PRM, 2019). The proposed program would restore wetland habitats throughout the program area and create new public access opportunities and viewpoints. Potential public access improvements and visitor amenities would include construction of new pedestrian trails and bike paths, elevated perimeter pedestrian walkways, educational or interpretive features, viewing areas with overlooks, new and improved parking facilities, and visitor centers. **These improvements would connect to existing trails in and around the program area, including the San Gabriel River Trail located on the south bank of the river, develop and enhance public access, recreation, and educational opportunities within the program area.** Restoration of the program area would attract visitors to the site and has the potential to attract additional visitors to nearby parks as well. The proposed program's potential to adversely impact park services will be evaluated in the PEIR.

Coordinate w/  
LACFCD



### v) Other public facilities?

**No Impact.** The Orange County Public Libraries provides library services to the City of Seal Beach, while the Long Beach Public Library provides library services to the City of Long Beach. The proposed program would not include any residential land uses or any land uses that would induce a substantial permanent population. Thus, the proposed program's potential to adversely impact libraries will not be evaluated in the PEIR.



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## References

City of Long Beach Fire Department, official website, <http://www.longbeach.gov/fire/>, accessed February 8, 2019.

City of Long Beach Police, official website, <http://www.longbeach.gov/police/contact-us/contact-us/>, accessed February 8, 2019.

City of Long Beach Parks, Recreation and Marine (PRM), official website, <http://www.longbeach.gov/park/>, accessed February 8, 2019.

City of Seal Beach, official website, <http://www.sealbeachca.gov/About-Us/New-Residents>, accessed February 9, 2019.

City of Seal Beach, Parks and Community Services Master Plan, <http://www.sealbeachca.gov/Portals/0/Documents/APPROVED%20MASTER%20PLAN%20-%20Website.pdf>, accessed February 8, 2019.

OC Public Libraries, official website, <http://www.ocpl.org/libloc/sb>, accessed February 9, 2019.

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## Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVI. RECREATION:</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?**

**Less Than Significant Impact.** The proposed program would restore wetland habitats throughout the program area and create new public access opportunities and viewpoints. Potential public access improvements and visitor amenities would include construction of new pedestrian trails and bike paths, elevated perimeter pedestrian walkways, educational or interpretive features, viewing areas with overlooks, new and improved parking facilities, and visitor centers. These improvements would develop and enhance public access, recreation, and educational opportunities within the program area. Although no new housing is proposed that would increase the residential population, restoration of the program area would attract visitors to the site and has the potential to attract additional visitors to nearby sites as well. The proposed program's potential to increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facilities would occur or be accelerated will be evaluated in the PEIR.

- b) **Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

**Potentially Significant Impact.** The proposed program would include the construction of new pedestrian trails and bike paths, elevated perimeter pedestrian walkways, educational or interpretive features, viewing areas with overlooks, new and improved parking facilities, and visitor centers. The proposed recreational facilities' potential to have an adverse physical effect on the environment will be evaluated in the PEIR.

## References

None.

## Transportation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVII. TRANSPORTATION — Would the project:</b>				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

### a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

**Potentially Significant Impact.** Implementation of the proposed program has the potential to affect the transportation system and increase traffic through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the program area. Although program operation will introduce new trips due to the visitor centers and pedestrian trails, these trips are not anticipated to occur during peak commuting hours. The program area is served by several public transit options, including Long Beach Transit and Orange County Transit Authority (OCTA). Long Beach Transit operates bus routes 121, 131, and 171 along the Pacific Coast Highway, adjacent to the program area. OCTA operates bus route 1 along the Pacific Coast Highway adjacent to the project area. The City of Long Beach General Plan Mobility Element identifies a Class II Bike Lane along the Pacific Coast Highway, which runs along the western boundary of the program area and the Class I San Gabriel Bike River Trail, which runs along the south bank of the river within the program boundary (City of Long Beach, 2013). Sidewalk improvements would be implemented in accordance with the Cities of Seal Beach and Long Beach along adjacent streets in the program area, improving public access around the perimeter and to the program area. A crosswalk would be installed on 2<sup>nd</sup> Street to provide access to the proposed visitor center. **Program construction would not likely require the temporary closure of any streets, bus stops, the Class II bike lane, or the Class I San Gabriel River Bike Trail,** but the proposed program's potential to conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities will be evaluated in the PEIR.

Coordinate w/  
LACFCD

- 
- b) **Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

**Potentially Significant Impact.** Implementation of the proposed program has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the program area. Program operation would also introduce new trips due to the visitor centers and pedestrian trails. The program also proposes sidewalk enhancements and crosswalks. As described above, the program area is served by several public transit options, including Long Beach Transit and Orange County Transit Authority. Per CEQA Guidelines, Section 15064.3(b), the program's transportation impacts would be evaluated in the PEIR based on vehicle miles traveled compared to existing conditions and proximity to existing transit.

- c) **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Potentially Significant Impact.** The proposed program would involve changes to sidewalks and crosswalks. New driveways would be constructed to access the parking lots for the proposed visitor centers. The program's potential to increase hazards due to a geometric design feature or incompatible uses will be evaluated in the PEIR.

- d) **Result in inadequate emergency access?**

**No Impact.** The proposed program would not expect to stage or store construction materials or construction equipment on public roadways. The program would not propose any public road closures or rerouting of the existing public roadway network. Although the proposed program may generate traffic trips during construction and operation, the traffic trips would be minimal and would not interfere with emergency access. Therefore, the program would not substantially impair emergency access, and no impact would occur, and no mitigation measures are required. This topic will not be evaluated in the PEIR.

## References

City of Long Beach, *General Plan Mobility Element*,  
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4112>, 2013, accessed  
February 8, 2019.

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## Tribal Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVIII. TRIBAL CULTURAL RESOURCES — Would the project:</b>				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**
- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Potentially Significant Impact.** The program area is considered sensitive for Native American cultural resources. The coastal and inland areas have been occupied by Native American groups since as early as 12,000 years ago. Consultation conducted as part of another project within the Los Cerritos Wetlands identified a potential Tribal Cultural Landscape that may be eligible for the National Register as a Tribal Cultural Property

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(California Coastal Commission, 2018). According to Native American representatives, the Los Cerritos Wetlands are located between the village sites of Puvungna and Motuucheyngna and is considered by them to be part of the larger cultural landscape of Puvungna and the surrounding villages. Therefore, potential significant impacts may occur. Additional background research on the program area, including California Native American Heritage Commission Sacred Lands File Search and consultation with Native Americans who are traditionally and cultural affiliated with the geographic area of the program area, will be conducted. The proposed program's potential to cause a substantial adverse change in the significance of a tribal cultural resource will be evaluated in the PEIR. Mitigation measures will be recommended to reduce potential significant impacts to tribal resources.

## References

California Coastal Commission. 2018. Staff Report: Regular Calendar – Application No. 9-18-0395 (Beach Oil Minerals [BOM] and the Los Cerritos Wetlands Authority [LCWA]). State of California Natural Resources Agency, Sacramento, California.

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## Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIX. UTILITIES AND SERVICE SYSTEMS —</b>				
<b>Would the project:</b>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and responsibly foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Potentially Significant Impact.** The proposed program would restore wetland habitats throughout the program area, which would involve construction activities for remediation of contaminated soil and groundwater, extensive grading, revegetation, construction of new public access opportunities (including trails, visitor centers, parking lots, and viewpoints), construction of flood management facilities (including earthen levees and berms, and walls), and modification of existing infrastructure and utilities.

Implementation of the program may increase the demand for water services compared to the existing water demand. Additionally, temporary construction activities and long-term operations could require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The proposed program's potential to result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or telecommunications facilities will be evaluated in the PEIR.



- 
- b) **Have sufficient water supplies available to serve the project and responsibly foreseeable future development during normal, dry and multiple dry years?**

**Potentially Significant Impact.** The potable water supply for the program area would be provided by the Seal Beach Utility Services or Long Beach Water Department, or other local water purveyor which uses groundwater, imported surface water and recycled supplies. Construction of the proposed program would use water for various purposes, such as dust suppression, mixing and pouring concrete, and other construction related activities. Typically, the majority of water used during construction is associated with dust suppression during grading and trenching, which is generally performed by water trucks. Water usage during construction would be temporary and not substantial and would not exceed the existing supply. The proposed program would introduce new visitor centers which would also require water for their operations. The proposed program's potential to have sufficient water supplies available to serve the program area and responsibly foreseeable future development during normal, dry and multiple dry years will be evaluated in the PEIR.

- c) **Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

**Potentially Significant Impact.** The proposed program would introduce public access opportunities (including trails, visitor centers, parking lots, and viewpoints) that would induce additional population (e.g., volunteers and users of the visitor centers) on-site, which may increase wastewater generated from the program area. Therefore, the PEIR will analyze the potential impacts associated with the program's wastewater generation and wastewater treatment capacity in the region.

- d) **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Potentially Significant Impact.** Construction of the proposed program would generate solid waste, including short-term construction debris. The materials that would be removed would be disposed of at a local recycling facility equipped to handle construction debris in a timely manner and in accordance to all applicable laws and regulations. Further, debris associated with the removal and abandonment of the oil wells would be in accordance with the terms of the Surface Use Agreement which requires abandonment to a standard acceptable to the State of California Division of Oil, Gas, and Geothermal Resources. Trash removal would occur as needed within the restored wetlands. The Los Angeles County Flood Control District operates and maintains trash booms and nets in other flood control channels and a similar boom/net could be installed upstream of the Central Area across the San Gabriel River. If a trash boom/net was installed, the Los Angeles County Flood Control District would inspect the trash net weekly and remove trash from the boom/net as necessary. The proposed program would

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introduce a new land use to the site, two visitor centers and public access opportunities, which would increase the daytime population of visitors on-site. As a result of this increase in the daytime population, the generation of solid waste on the program area would increase. Therefore, the PEIR will evaluate waste generated by the project and planned solid waste disposal capacity for the region.

e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Potentially Significant Impact.** The proposed program would be required to comply with all applicable federal, state, County, and City statutes and regulations pertaining to solid waste disposal. This includes compliance with AB 939, the California Solid Waste Management Act, which requires each city in the state to divert at least 50 percent of their solid waste from landfill disposal through source reduction, recycling, and composting. AB 341 builds upon AB 939 and requires jurisdictions to implement mandatory commercial recycling with a statewide 75 percent diversion rate (from landfill disposal) by 2020. The proposed program's potential to conflict with federal, state, and local statutes and regulations related to solid waste will be evaluated in the PEIR.

## References

City of Long Beach Water Department, official website, <http://www.lbwater.org/sewage-treatment>, accessed February 8, 2019.

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## Wildfire

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XX. WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

### a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

**No Impact.** The program area is not located in a very high fire hazard severity zone (CAL FIRE, 2019). The City of Seal Beach Emergency Operations Plan provides emergency response and evacuation procedures for the city in lieu of firm routes of evacuation. These procedures are based on the number of people to be evacuated, the road capacity, and which roads may be blocked or have their capacity reduced by disaster conditions (City of Seal Beach, 2017). Similarly, the City of Long Beach General Plan Public Safety Element does not establish firm routes of evacuation, rather it provides that emergency response and emergency evacuation procedures for the City will be based on availability of through streets, multiple access routes and bridges depending on the disaster and the street conditions at the time (City of Long Beach, 1975). The proposed program would not expect to stage or store construction materials or construction equipment on public roadways. The program would not propose any public road closures or rerouting of the existing public roadway network. Although the proposed program may generate traffic trips during construction and operation, the traffic trips would be minimal and would not interfere with an adopted emergency response plan. Therefore, the program would not substantially impair an adopted emergency response plan or emergency evacuation plan, and no impact would occur, and no mitigation measures are required. This topic will not be evaluated in the PEIR.

- 
- b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**No Impact.** The program area is not located in a very high fire hazard severity zone (CAL FIRE, 2019). The program area is located in a highly urbanized area with an overall flat terrain. Therefore, the program would not exacerbate wildfire risks due to slope, prevailing winds or other factors, and thereby expose program occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and no impact would occur, and no mitigation measures are required. This topic will not be evaluated in the PEIR.

- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**No Impact.** The program area is not located in a very high fire hazard severity zone (CAL FIRE, 2019). The proposed program would not involve the installation or maintenance of roads, fuel breaks, emergency water sources, or other utilities. Although work on power lines would occur, it would involve raising existing overhead electrical lines which would not exacerbate fire risk. Therefore, the program would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, and no impacts would occur, and no mitigation measures are required. This topic will not be evaluated in the PEIR.

- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No Impact.** The program area is not located in a very high fire hazard severity zone (CAL FIRE, 2019). Therefore, the program would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and no impacts would occur, and no mitigation measures are required. This topic will not be evaluated in the PEIR.

## References

City of Long Beach, *General Plan Public Safety Element*,  
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2545>, 1975, accessed February 7, 2019.

City of Seal Beach, Emergency Operations Plan,  
<http://www.sealbeachca.gov/Portals/0/Documents/LinkClick.aspx?fileticket=RCGspjGTVtw%3D&portalid=0>, accessed February 21, 2019.

## Mandatory Findings of Significance

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE —</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

**Potentially Significant Impact.** As discussed above, the proposed program could impact the habitat of fish or wildlife spaces, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of rare or endangered plant or animal. The proposed program could also result in potentially significant impacts with regard to historic and cultural resources. The PEIR will analyze and document such potentially significant impacts.

- b) **Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**Potentially Significant Impact.** The potential for cumulative impacts occurs when the independent impacts of the proposed program are combined with impacts from other developments to result in impacts that are greater than the impacts of the proposed program alone. Located within the vicinity of the program area are other current and reasonably foreseeable projects whose development, in conjunction with that of the

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proposed program, may contribute to potential cumulative impacts. Impacts of the program's construction and implementation on both an individual and cumulative basis will be addressed in the PEIR for the following subject areas: aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services (fire protection, police protection and parks), recreation, transportation and traffic, tribal cultural resources, and utilities and service systems.

With regard to cumulative effects for the issues of agriculture and forest resources, population and housing, and other public services (schools and libraries) as well as parks and recreation and wildfire, the proposed program would not combine with related projects or other cumulative growth to result in significant cumulative impacts. With regard to agricultural and forest resources, the proposed program would have no impact to these resources and would not combine with other projects to result in cumulative impacts. With regard to population and housing, schools, and libraries, the proposed program would not include permanent or temporary housing, and thus would not increase the permanent population of the area, and would not directly contribute to population growth, and the need for schools and libraries within the program area vicinity. With regard to wildfire, the program area is not located within a very high fire hazard severity zone and would have no effect on the potential risk of wildfire and would not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts for these subject areas would be considered less than significant and will not be evaluated in the PEIR.

**c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?**

**Potentially Significant Impact.** The proposed program could result in potentially significant impacts with regard to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services (fire protection, police protection and parks), recreation, transportation and traffic, tribal cultural resources, and utilities and service systems. Implementation of the proposed program could result in significant impacts that may result in substantial adverse effects on human beings. These potential effects will be analyzed in the PEIR.

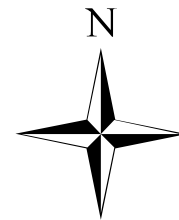
## **References**

None.



# ALAMITOS BARRIER PROJECT Observation Wells Within Los Cerritos Wetlands

Attachment:  
LACFCD existing  
Infrastructure





**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
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MAR 30 2019

**LOS CERRITOS  
WETLANDS AUTHORITY**

Making Conservation  
a California Way of Life.

March 28, 2019

Sally Gee  
Los Cerritos Wetland Authority  
100 N. Old San Gabriel Canyon Rd.,  
Azusa, CA 91702

RE: Los Cerritos Wetlands Restoration Plan –  
Notice of Preparation (NOP)  
SCH# 2019039050  
GTS # 07-LA-2019-02363  
Vic. LA-1/PM: 0.08

Dear Ms. Sally Gee:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project's NOP. The proposed program would restore wetland, transitional, and upland habitats throughout the program area. This would involve remediation of contaminated soil, grading, revegetation, construction of new public access opportunities, construction of flood management facilities, and modification of existing infrastructure and utilities.

After reviewing this project's NOP Caltrans has the following comments:

- A Transportation Impact Study is required if the project will result in potentially significant or significant transportation impacts. Please consider including the following items when evaluating the project's potential impact to the circulation system:
  - 1) During construction trucks for hauling of excavated materials/debris, transport of construction equipment, the delivery of construction materials, and trips from construction workers will all potentially increase traffic. Please assess/address the impact of the added traffic volumes to the State Route 1 (SR-1) and State Route 22 (SR-22) on and off-ramp locations in the Programmatic Environmental Impact Report (PEIR).
  - 2) Please provide the number of trips generated that will be accessing the SR-1 and SR-22 interchange.
  - 3) The Initial Study indicated that significant earth-moving activities will take place during construction. Caltrans recommends vehicles are covered when hauling dirt/sediment. Please be cautious of lost sediment spilling onto roads and state facilities during this process as this can adversely impact state facilities.
  - 4) Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods
  - 5) Please consider the installation of a sidewalk along Studebaker Road. This addition would greatly



enhance accessibility and promote active transportation to the proposed project

Further information included for your consideration:

Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improve safety by lessening the time that the user is in the likely path of a motor vehicle. These methods include the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Caltrans recommends the project to consider the use of methods such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping, be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

An encroachment permit will be required for any project on, or in the vicinity of, the Caltrans right of way. Please note that any modifications to the State facility (SR-1 or SR-22) will be subject to additional review by the Office of Permits prior to issuance of the permit.

Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan.

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at [reece.allen@dot.ca.gov](mailto:reece.allen@dot.ca.gov) and refer to GTS# 07-LA-2019-02363.

Sincerely,

A handwritten signature in blue ink, appearing to read "Miya E.", is written over the word "Sincerely,".

MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

**CALIFORNIA COASTAL COMMISSION**

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April 8, 2019

Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Rd.  
Azusa, California 91702

**Re: Comments on Notice of Preparation of a Draft Environmental Impact Report for  
the Los Cerritos Wetlands Restoration Plan**

Dear Ms. Gee:

Thank you for the opportunity to provide input on the Los Cerritos Wetlands Authority's ("LCWA") preparation of an Environmental Impact Report ("EIR") for the Los Cerritos Wetlands Plan in the East Long Beach and North Seal Beach areas in Los Angeles and Orange counties. The proposed restoration plan will identify restoration designs for 503 acres of land on both sides of the San Gabriel River. The Plan seeks to restore tidal wetlands and upland habitat across 17 individual sites and will involve remediation of contaminated soil, grading, revegetation, construction of new public access ways, construction of flood management facilities and modification of existing infrastructure.

All project sites within the Plan are located within the Coastal Zone. Portions of the site are also within the City of Long Beach's ("City") Local Coastal Program (LCP) jurisdiction and within the boundary of the City's Southeast Area Development and Improvement Plan (SEADIP). Development proposed under the Plan will require a Coastal Development Permit (CDP) from the Commission for portions of the project within Seal Beach and areas outside the City of Long Beach's LCP jurisdiction. The City is in the process of updating the SEADIP plan to be included in the City's certified LCP. This process is ongoing and the timing of potential certification of the revised SEADIP plan (i.e., SEASP) could affect which entity issues a CDP for certain portions of LCWA's proposed Plan. For the portions of the Plan that fall within the Commission's jurisdiction, the standard of review that the Commission will use to evaluate a CDP is the policies in Chapter 3 of the Coastal Act, with the City's LCP used as guidance.

The Coastal Commission will refer to the contents of this EIR in its evaluation of any projects proposed as part of the Plan. Potential Coastal Act issues raised by the Project include: siting of hazardous industrial development; seismic and subsidence hazards; soil and groundwater contamination; oil spills and release of other hazardous materials; water and air quality; hydrology; greenhouse gas emissions; noise; visual impacts; recreation and public access; cultural and tribal resources; wetlands and other environmentally sensitive habitats; and cumulative impacts.

The Notice of Preparation (“NOP”) identifies each of these as potentially significant impacts that will be evaluated in the EIR. To assist us in our review of proposed project elements, we request that the EIR specifically address the following:

General:

1. For all issue areas, please include in the EIR all relevant Coastal Act and LCP policies, an analysis of the project’s conformity with the identified policies, and any identification of mitigation measures necessary to bring the project into conformity with the Coastal Act and LCP (where applicable).
  2. Please include a thorough discussion of the regulatory jurisdictions of the various project sites and components. Also, please include a complete list of permits required by local, state and federal agencies to implement the proposed project.
  3. Please clarify how the evaluation and possible approval of the proposed project fits in with the City’s ongoing efforts to update and certify the updated SEADIP (i.e., SEASP).
- 
4. Please include a detailed description of existing and future oil and gas development within the Program Area and how this development will interact with proposed restoration areas.
  5. Please describe in detail how long-term management management of created habitat areas will be implemented and funded.
  6. Please describe a proposed baseline monitoring program and the framework for adaptive management that LCWA will use to track restoration success.

Environmental Factors

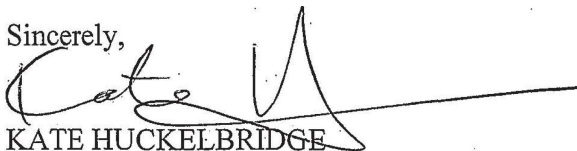
7. Aesthetics: Please assess if this project will be visible from any scenic view corridors or other public viewing areas like parks, etc. Please include visual simulations of this project’s effects on the coastal scenic vista from public viewing areas.
8. Biological Resources: Please analyze the extent of noise, vibration, traffic and other impacts, if any, on surrounding biological resources including wetlands, sensitive habitats and species. The noise analysis should identify all sensitive receptors and evaluate peak noise and nighttime noise for the different phases of Plan Implementation.
9. Cultural and Tribal Resources: Please analyze impacts to known and unknown cultural and tribal resources as well as potential impacts to sacred places and Tribal Cultural

Landscapes. We recommend reaching out to tribal representatives involved in the Beach Oil Minerals Partners Oil Consolidation and Wetlands Restoration Project.

10. Hazards and Hazardous Materials: As part of the hazards analysis, please provide detailed mapping of utilities and pipelines located within the Plan Area. The EIR should include a section analyzing the potential for oil spills from existing oil infrastructure and potential effects on restored habitat areas, including in a seismic event, flood, or other hazard-inducing event. The EIR should also identify mitigation measures necessary to minimize the potential for adverse impacts from releases of oil and other hazardous materials from adjacent or nearby properties.
11. Hydrology and Water Quality: Please include hydrologic modeling and analysis that uses current data to evaluate anticipated tidal flows within future wetland areas and determine flood potential and risks associated with proposed projects. Modeling should include analysis of future flows with and without circulation provided by the Haynes Power Plant (as applicable). In addition, please include analysis of various sea level rise scenarios and the potential effect of rising sea level on proposed projects. This modeling and analysis will also inform determination of impacts under other Coastal Act policies.
12. Recreation: Please analyze the impact of the proposed public access and recreation plan elements on existing and proposed wetland and other habitat areas. It will be important to understand both the recreational benefits from adding public access within the proposed wetland and other habitat areas and the potential adverse effects on the biological resources from introducing public access to sensitive areas.

We greatly appreciate the outreach, regular updates and other communications between the LCWA and Coastal Commission staff as Plan details develop and the EIR commences. We look forward to working closely with the LCWA as it prepares a Draft EIR. Please do not hesitate to call me at 415-396-9708 if we can be of assistance at any phase of the environmental review process.

Sincerely,



KATE HUCKELBRIDGE  
Senior Environmental Scientist

Cc: Dani Ziff, CCC Long Beach



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



April 17, 2019

Ms. Sally Gee  
Los Cerritos Wetlands Authority  
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**Subject: Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the Los Cerritos Wetlands Restoration Plan Project; SCH# 2019039050; Los Angeles and Orange Counties**

Dear Ms. Gee:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) for the Los Cerritos Wetlands Restoration Plan (Project) Draft Program Environmental Impact Report (DPEIR) prepared pursuant to the California Environmental Quality Act (Public Resources Code 21000 et seq.) with the Los Cerritos Wetlands Authority (LCWA) acting as lead agency.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

### **CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code §§ 711.7, subdivision (a) & 1802; Public Resources Code § 21070; CEQA Guidelines § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is directed to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code § 21069; CEQA Guidelines § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration (LSA) regulatory authority (Fish & Game Code § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" (see Fish & Game Code § 2050) of any species protected under the California Endangered Species Act (CESA; Fish & Game Code § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & Game Code § 1900 et seq.), CDFW recommends the project proponent obtain appropriate authorization under the Fish and Game Code.

**Project Location:** The 503-acre Project site is located in northern Seal Beach and eastern Long Beach, straddling the border of Orange and Los Angeles Counties.

**Background/History:** A portion of the Project site has been evaluated as part of a project-level Environmental Impact Report (EIR) for the Los Cerritos Wetlands Oil Consolidation and Restoration Project (SCH# 2016041083). The EIR evaluated the environmental impacts associated with the consolidation of existing oil operations and implementation of a wetlands habitat restoration project. The EIR was certified by the City of Long Beach City Council on January 16, 2018. In December 2018, the California Coastal Commission approved an application by Beach Oil Minerals (Synergy) of Long Beach, for new oil production and wetlands restoration project that includes: 1) construction and operation of two oil production facilities, including drilling and operation of up to 120 new wells; 2) construction and operation of 2,200 ft. of above-ground oil pipeline; 3) decommissioning of existing oil facilities on two sites; 4) conversion of existing building to a visitor's center for Los Cerritos Wetlands; and, 5) implementation of wetlands restoration as part of a mitigation bank on the northern portion of the existing oil field (northern Synergy Oil field site).

LCWA previously developed a Los Cerritos Wetlands Final Conceptual Restoration Plan, which was adopted by the LCWA Board of Directors in August 2015. The Los Cerritos Wetlands Final Conceptual Restoration Plan identified three restoration designs and provided an alternatives analyses report for habitat enhancement and improved public access.

**Project Description/Objectives:** The proposed Project would restore wetland, transitional, and upland habitats throughout four areas identified as North, Central, Isthmus, and South. This would involve remediation of contaminated soil, grading, re-vegetation, construction of new public access opportunities (including trails, visitor centers, parking lots, and viewpoints), construction of flood management facilities (including earthen levees and berms, and walls), and modification of existing infrastructure and utilities. Project objectives include restoring tidal wetland processes and functions, maximizing contiguous habitat areas, buffering human disturbance, and creating public access and an interpretive program.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist LCWA in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

### Specific Comments

- 1) Conceptual Restoration Plan. The NOP references the Los Cerritos Wetlands Final Conceptual Restoration Plan, which describes restoration alternatives. It is unclear from the NOP whether the Los Cerritos Wetlands Final Conceptual Restoration Plan has undergone independent scientific review or public review under CEQA. The DPEIR should incorporate any relevant planning documents related to scientific and/or public review for the Final Conceptual Restoration Plan by reference, and/or include them in the appendices of the DPEIR (CEQA Guidelines § 15150).
- 2) Mitigation Bank. CDFW has been coordinating with the LCWA on Upper Los Cerritos Wetlands Mitigation Bank, a potential mitigation bank within northern Synergy Oil field site at



Steamshovel Slough. Regarding potential mitigation banking proposed within the Project site:

- a) The DPEIR should provide a clear description of how the potential mitigation bank relates to the Los Cerritos Wetlands Final Conceptual Restoration Plan and/or the proposed Project;
  - b) The DPEIR should describe the exact location and extent where mitigation banking will take place. This description should include an analysis of existing habitat types, areas proposed for restoration/creation, and accompanying figures. If biological resources will be adversely impacted through habitat type conversion, the DPEIR should identify, analyze, and appropriately mitigate these impacts;
  - c) The DPEIR should identify any potential slant drilling or other mineral production techniques occurring underneath conserved areas proposed for banking. Potential impacts to conserved areas should be disclosed and analyzed in the DPEIR. Mitigation measures to bring such impacts below a level of significance should be included in the DPEIR;
  - d) Long-term habitat values, and therefore the quality of habitat-level credits, may be significantly adversely impacted by variables such as levels of public access/anthropogenic disturbance and mining infrastructure/operations. We encourage LCWA to minimize these variables within the overall Project site and especially in areas which are being considered for mitigation banking, whenever feasible; and
  - e) Mitigation banking inquiries may be directed to the CDFW's South Coast Region Banking Coordinator, Warren Wong, at (858) 627-3997 or via email at [warren.wong@wildlife.ca.gov](mailto:warren.wong@wildlife.ca.gov).
- 3) Previous Mitigation. The DPEIR should clearly identify whether any part of the Project site was used as mitigation for previous municipal, county, or state projects. Replacement mitigation for impacts to areas where mitigation has already occurred in association with other CEQA actions should be considered separate from and in addition to compensation for other biological resources impacts. In such cases, appropriate and in-kind mitigation at no less than a 10:1 mitigation ratio should be provided.
- 4) Potentially Existing Biological Resources. CDFW recommends surveys for the following wildlife species be conducted and the results included in the DPEIR: 1) the south coast marsh vole (*Microtus californicus stephensi*), a Species of Special Concern (SSC) limited to grasslands and tidal marshes from Ventura to Orange County; and, 2) southern California salt marsh shrew (*Sorex ornatus salicornicus*), a Species of Special Concern. The southern California salt marsh shrew is confined to coastal salt marshes and uses Salicornia marshes, saltgrass marshes, dense *Salix* spp. and *Scirpus* sp. thickets in Los Angeles, Orange, and Ventura counties (Williams 1986). Available data indicate that there may be as few as six disjunct patches of salt marsh habitat remaining and only two California salt marsh shrew populations (Bolster, 1998). Although the species may meet the threshold of threatened or endangered, the southern California salt marsh shrew is currently designated as a SSC because of the need for additional information. Impacts to SSC, including the south coast marsh vole and southern California salt marsh shrew, should be considered a significant direct and cumulative adverse effect under CEQA without implementing

appropriate avoidance and/or mitigation measures (CEQA Guidelines §§ 15064, 15065, 15125[c] and 15380).

If either species is determined to be present in the Project site, CDFW recommends designing the Project in a manner to avoid any impacts to these species, their habitat, or the processes that support their habitat.

- 5) Known Existing Biological Resources. CDFW recommends the DPEIR evaluate how the proposed alternative designs account for the presence and avoidance of the following special status species documented on the Project site: southern tarplant (*Centromadia parryi australis*), Belding's savannah sparrow (*Passerculus sandwichensis*), burrowing owl (*Athene cunicularia*), short-eared owl (*Asio flammeus*), wandering skipper butterfly (*Panoquina errans*), woolly seablite (*Suaeda taxifolia*), estuary seablite (*Suaeda esteroa*), and mudflat tiger beetle (*Cicindela trifasciata sigmoidea*). In addition, the Project site provides foraging areas for the fully protected, federally-listed, and State-listed California least tern (*Sterna antillarum browni*) and California brown pelican (*Pelicanus occidentalis*). Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock or as part of an approved Natural Community Conservation Plan (Fish and Game Code § 2835). The DPEIR should identify how the proposed Project will avoid impacts to California least tern, California brown pelican and any other fully protected species.
- 6) Newport-Inglewood Fault. Due to the Newport-Inglewood fault crossing through the Project site, there is a potential for spills and leaks of existing wells, proposed slant-drilled wells, pipelines, and other facilities containing materials hazardous to substantially impact critically important wildlife including rare aquatic habitat areas. The DPEIR should identify and analyze potential impacts related to the Newport-Inglewood fault given that it is interconnected with the Los Cerritos wetland complex.
- 7) Existing and Future Oil and Gas Development. The DPEIR should include a detailed description of existing and future oil and gas development within the Project site and how this development will interact with proposed restoration areas. An analysis of noise, vibration, traffic, and other impacts from oil/gas operations on biological resources including wetlands, sensitive habitats, and species should be conducted. The noise/vibration analysis should identify all sensitive receptors and evaluate peak and night-time noise for the different phases of Project implementation.

## **General Comments**

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DPEIR:
  - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
  - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated



(CEQA Guidelines § 15126.6). The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.

- 2) LSA Agreements. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a LSA Agreement with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DPEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement<sup>1</sup>.
  - a) The Project area supports aquatic, riparian, and wetland habitats; therefore, a preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DPEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service (USFWS) wetland definition adopted by the CDFW (Cowardian, 1970). Some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' section 404 permit and Regional Water Quality Control Board section 401 Certification.
  - b) In areas of the Project site which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
  - c) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the DPEIR.
- 3) Wetlands Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's policies. The Wetlands Resources policy (<http://www.fgc.ca.gov/policy/>) of the Fish and Game Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

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<sup>1</sup> A notification package for a LSA may be obtained by accessing the CDFW's web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the Project must include mitigation measures to assure a “no net loss” of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DPEIR and these measures should compensate for the loss of function and value.
- b) The Fish and Game Commission’s Water policy guides CDFW on the quantity and quality of the waters of this state that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this state; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & Game Code § 5650).
- 4) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or State-listed rare plant species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 5) Biological Baseline Assessment. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats, the DPEIR should include the following information:

- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)];
  - b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>);
  - c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer, 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
  - d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the project. CDFW's California Natural Diversity Data Base (CNDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDB Field Survey Forms be completed and submitted to CNDDB to document survey results. Online forms can be obtained and submitted at [http://www.dfg.ca.gov/biogeodata/cnddb/submitting\\_data\\_to\\_cnddb.asp](http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp);
  - e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California SSC and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,
  - f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.
- 6) Biological Direct, Indirect, and Cumulative Impacts. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DPEIR:
- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address Project-related changes on drainage patterns and downstream of the project site; the volume, velocity, and

frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;

- b) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP (Fish and Game Code § 2800 et. seq.). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DPEIR;
  - c) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DPEIR; and,
  - d) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
- 7) Avoidance, Minimization, and Mitigation for Sensitive Plants. The DPEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. CDFW considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2008).
- 8) Compensatory Mitigation. The DPEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 9) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DPEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced

qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

- 10) Nesting Birds. CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300-feet of the disturbance area (within 500-feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 11) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 12) Moving out of Harm's Way. The proposed Project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, we recommend that a qualified biological monitor approved by CDFW be on-site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss. If the project requires species to be removed, disturbed, or otherwise handled, we recommend that the DPEIR clearly identify that the designated entity shall obtain all appropriate state and federal permits.
- 13) Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: a) the location of restoration sites and assessment of appropriate reference sites; b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; c) a schematic depicting the mitigation area;



d) a local seed and cuttings and planting schedule; e) a description of the irrigation methodology; f) measures to control exotic vegetation on site; g) specific success criteria; h) a detailed monitoring program; i) contingency measures should the success criteria not be met; and, j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

- a) CDFW recommends that local on-site propagules from the Project area and nearby vicinity be collected and used for restoration purposes. On-site seed collection should be initiated in the near future to accumulate sufficient propagule material for subsequent use in future years. On-site vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.
- b) Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include (for example) retention of woody material, logs, snags, rocks and brush piles (see Mayer and Laudenslayer, 1988).

## CONCLUSION

CDFW appreciates the opportunity to comment on the NOP for the Los Cerritos Wetlands Restoration Plan to assist LCWA in identifying, avoiding and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Kelly Schmoker-Stanphill (Senior Environmental Scientist, Specialist), at (626) 335-9092 or by email at [Kelly.schmoker@wildlife.ca.gov](mailto:Kelly.schmoker@wildlife.ca.gov).

Sincerely,



Erinn Wilson  
Environmental Program Manager I

cc: CDFW  
Erinn Wilson – Los Alamitos  
Gail Sevens – San Diego  
Victoria Tang – Los Alamitos  
Eric Weiss – San Diego  
Kelly Schmoker – Glendora  
Warren Wong – San Diego  
Jennifer Turner – San Diego  
Andrew Valand – Los Alamitos

California Coastal Commission  
Kate Huckelbridge, Ph.D., [Kate.Huckelbridge@coastal.ca.gov](mailto:Kate.Huckelbridge@coastal.ca.gov)

Scott Morgan (State Clearinghouse)

## **References**

Bolster, B.C. 1998. Terrestrial Mammal Species of Special Concern in California.

Cowardin, Lewis M., et al. 1970. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

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# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA USPS AND E-MAIL:

April 2, 2019

[sgee@rmc.ca.gov](mailto:sgee@rmc.ca.gov)

Sally Gee, Project Manager  
Los Cerritos Wetlands Authority  
100 N. Old san Gabriel Canyon Road  
Azusa, CA 91702

## **Notice of Preparation of a Draft Environmental Impact Report for the Proposed Los Cerritos Wetlands Restoration Plan**

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional

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<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.



perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO<sub>x</sub>) emissions in 2023 and an additional 55 percent NO<sub>x</sub> reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance<sup>2</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

SCAQMD has also developed both regional and localized air quality significance thresholds. SCAQMD staff requests that the Lead Agency compare the emissions to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Draft EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Draft EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and

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<sup>2</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the emissions from the overlapping construction and operational activities should be combined and compared to SCAQMD's regional air quality CEQA operational thresholds to determine the level of significance.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

### **Mitigation Measures**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11 "Mitigating the Impact of a Project" of SCAQMD's *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **Alternatives**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits**

In the event that implementation of the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and mitigated where feasible. Please contact me at (909) 396-3308, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Draft Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190313-04

Control Number



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
[www.lacsd.org](http://www.lacsd.org)

GRACE ROBINSON HYDE  
Chief Engineer and General Manager

RECEIVED

1919-0056

APR 05 2019

April 3, 2019

Ref. Doc. No.: 4959987

Ms. Sally Gee  
Los Cerritos Wetlands Authority  
100 North Old San Gabriel Canyon Road  
Azusa, CA 91702

LOS CERRITOS  
WETLANDS AUTHORITY

Dear Ms. Gee:

### NOP for Los Cerritos Wetlands Restoration Plan

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on March 12, 2019. The majority of the proposed project area is located within the jurisdictional boundaries of District No. 3. We offer the following comments:

1. The proposed project may impact existing and/or proposed Districts' facilities (e.g. trunk sewers, recycled waterlines, etc.) over which it will be constructed. Districts' facilities are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of, the proposed project until project plans and specification that incorporate Districts' facilities are submitted for our review. To obtain copies of as-built drawings of the Districts' facilities within the project limits, please contact the Districts' Engineering Counter at [engineeringcounter@lacsd.org](mailto:engineeringcounter@lacsd.org) or (562) 908-4288, extension 1205. When project plans that incorporate our facilities have been prepared, please submit copies of the same to the Engineering Counter for our review and comment.
2. Availability of sewer capacity depends upon project size and timing of connection to the sewerage system. Because there are other proposed developments in the area, the availability of trunk sewer capacity should be verified as the project advances. Please submit a copy of the project's build-out schedule to the undersigned to ensure the project is considered when planning future sewerage system relief and replacement projects.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

cc: Engineering Counter  
A. Howard

April 8, 2019

NCL-19-005

Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Rd.  
Azusa, CA 91702

**Subject:** Draft Environmental Impact Report for the Los Cerritos Wetlands Restoration Plan

Dear Ms. Sally Gee:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Los Cerritos Wetlands Restoration Plan. The County of Orange offers the following comments for your consideration.

**OC Infrastructure Programs /Flood Programs/Hydrology**

1. It appears that the proposed project could have a potential significant impact on the Orange County Flood Control District (OCFCD) facilities. Los Alamitos Channel (Facility No.C01), Federal Storm Channel (Facility No.C01S06), Los Alamitos Retarding Basin (Facility No.C01B01), and Los Alamitos Pump Station (Facility No.C01PS1) are in the subject project's vicinity. A map/exhibit should clearly identify and indicate regional flood control facilities that will likely be impacted by the proposed project. Drainage Facility Base maps that depict existing local and regional drainage facilities owned by the OCFCD are available for review at <http://www.ocflood.com/docs/drawings>
2. The proposed program should not worsen existing conditions or shift flooding problems upstream or downstream of proposed developments. Appropriate mitigation measures should be provided to address adverse impacts, and minimize increased runoff resulting from the project.
3. A discussion of such impacts supported by hydrology and hydraulics analyses, and mitigation measures, including erosion and scour in natural watercourses, should be included in the next submittals.
4. Hydrologic and hydraulic analyses should evaluate and compare quantitatively the runoff volumes, peak flow rate increases, and adequacy and capacity of existing drainage facilities. All appropriate studies (if necessary) must conform to the current guidelines and criteria as specified in the Orange County Hydrology Manual (OCHM), Addendum No. 1 to the OCHM, and the OCFCD Design Manual.
5. Since the City of Seal Beach is responsible for land use planning and development within City limits, the City should review and approve all local hydrology and hydraulic analyses including the needed 100-year flood protection for proposed changes to the developments within the project area.

6. The City of Seal Beach, as floodplain administrators, should ensure that floodplains are properly identified and that structures are designed in conformance with local floodplain ordinances, and Federal Emergency Management Agency (FEMA) regulations.
7. All work within or adjacent to any OCFCD right-of-way for flood control facilities shall be conducted so as not to adversely impact channel's structural integrity, hydraulic flow conditions, access and maintainability. Furthermore, all proposed projects within OCFCD's right-of-way should be reviewed and approved by OC Public Works, and the work should be conducted only after an encroachment permit has been obtained. For information regarding the permit application process and other details please refer to the Encroachment Permits Section link on OC Public Works' website [http://www.ocpublicworks.com/ds/permits/encroachment\\_permits](http://www.ocpublicworks.com/ds/permits/encroachment_permits). Technical reviews and approvals for the proposed work will be accomplished within the permit process.

If you have any questions regarding these comments, please contact Sahar Parsi at (714) 647-3988 or Penny Lew at (714) 647-3990 in OC Infrastructure Programs or Cindy Salazar at (714) 667-8870 in OC Development Services.

Sincerely,



Richard Vuong, Manager, Planning Division  
OC Public Works Service Area/OC Development Services  
300 North Flower Street  
Santa Ana, California 92702-4048  
[Richard.Vuong@ocpw.ocgov.com](mailto:Richard.Vuong@ocpw.ocgov.com)

cc: Sahar Parsi, OC Flood Programs/Hydrology & Floodplain Management  
Penny Lew, OC Flood Programs/Hydrology & Floodplain Management

**From:** [Sally Gee](#)  
**Sent:** Friday, April 12, 2019 1:48 PM  
**To:** [Reema Shakra](#); [Ryan Todaro](#)  
**Cc:** [Raiven Greenberg](#); [eric@tidalinfluence.com](mailto:eric@tidalinfluence.com)  
**Subject:** Fw: Los Cerritos Wetlands Restoration Plans NOP-DEIR  
**Attachments:** Additional LACFCD comments.pdf; LACFCD Existing Infrastructures.pdf

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Hi Reema,

Meant to forward these to you sooner, but didn't get the chance to.

Thanks,  
Sally

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**From:** Toan Duong <TDUONG@dpw.lacounty.gov>  
**Sent:** Tuesday, April 9, 2019 1:17 PM  
**To:** Sally Gee  
**Cc:** Long Thang; Jose Suarez; Alex Mikhailpoor; Liana Poghosyan  
**Subject:** Los Cerritos Wetlands Restoration Plans NOP-DEIR

Ms. Sally Gee  
Los Cerritos Wetlands Authority

Thank you for the opportunity to review the Notice Of Preparation of a Draft Environmental Impact Report (DEIR) for the subject project. The following comments from the Los Angeles County Public Works Department (Public Works) and the Los Angeles County Flood Control District (LACFCD) are for your information and consideration:

1. The LACFCD is also a required permitting agency for this project. Any proposed construction affecting LACFCD facilities must comply with Public Works design standards and mitigations provided. For permit information, please contact Mr. Sam Chin of Public Works, Land Development Division, Encroachment Permit and Inspection Section, at (626) 458-4921 or [schin@dpw.lacounty.gov](mailto:schin@dpw.lacounty.gov).
2. If the project will result in this land being inundated by a 1% annual chance flood, please consult with the National Flood Insurance Program (NFIP) Floodplain Managers for the Cities of Long Beach and Seal Beach to ascertain whether FEMA's regulations for the NFIP will require a Conditional Letter of Map Revision (CLOMR) and final LOMR from FEMA.
3. LACFCD has existing infrastructure within the project area that need continuous access to for measuring groundwater, sampling, and maintenance. Please provide and confirm that LACFCD will have access to its facilities (See attached map – "LACFCD Existing Infrastructure".)
4. Provide and maintain vehicular access for maintenance purposes along the San Gabriel River on both Right and Left bank.



5. The North Area of the Project shall establish a new easement and maintenance road to access along the Left bank of Los Cerritos Channel.
6. Sediment removal within Los Cerritos Channel and San Gabriel River impacted by the Project shall be assessed and removed in order to restore flow capacity per the original as-built plans.
7. LACFCD shall not be responsible for the new wetland improvements or its maintenance except for our responsibility to maintain Los Cerritos Channel, San Gabriel River, associated easements and our maintenance roads.
8. A long-term Operation and Maintenance Agreement shall be established identifying LACFCD's maintenance responsibilities and others.
9. It is our understanding that:
  - 9.1. LCWA previously developed a concept that included technical reports that provide baseline data on proposed project could potentially have significant impacts on hydrology and water quality mainly during construction.
  - 9.2. Operational activities of the proposed Post-restoration such as vegetation maintenance and periodic maintenance of roads and trails have the potential to introduce sediment and other pollutants to surface or groundwater, thereby impacting water quality such that water standards or waste discharge requirements could be violated.
  - 9.3. New flow patterns after restoration could increase erosion from the wetlands during large storm event, which could re-suspend sediment and potential constituents such as metals (e.g. copper zinc, silver and lead), and organic compounds (e.g. PAHs pesticides and PBCs) within the estuary. Additionally, post-restoration, contaminated water and sediment from the watershed could be transported into the restored marsh resulting in areas of accumulated contaminated sediments. Lastly, water quality degradation could occur at ocean disposal sites if excavated program sediments are placed there.
10. Please see additional comments (via markups) in the attached copy of the Initial Study.

We request the opportunity to review the future environmental document when it is available. If you have any questions regarding these comments, please contact Mr. Long Thang of Public Works, Stormwater Planning Division at (626) 458 5119 or lthang@dpw.lacounty.gov.

Thank you.

Toan Duong  
Civil Engineer  
Los Angeles County Public Works  
Office: (626) 458-4921



NATIVE AMERICAN HERITAGE COMMISSION  
Cultural and Environmental Department

1550 Harbor Blvd., Suite 100

West Sacramento, CA 95691 Phone (916) 373-3710

Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)Website: <http://www.nahc.ca.gov>

Twitter: @CA\_NAHC

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IN19-00055

APR 05 2019

LOS CERRITOS  
WETLANDS AUTHORITY

April 2, 2019

Sally Gee

Los Cerritos Wetlands Authority

100 N. Old San Gabriel Canyon Rd.

Azusa, CA 91702

RE: SCH# 2019039050 Los Cerritos Wetlands Restoration Plan, Los Angeles and Orange County

Dear Ms. Gee:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Steven.Quinn@nahc.ca.gov.

Sincerely,



for  
Steven Quinn  
Associate Governmental Program Analyst

cc: State Clearinghouse

**From:** [Anna Christensen](#)  
**Sent:** Monday, April 8, 2019 5:03 PM  
**To:** Sally Gee  
**Subject:** Fw: LCWA Los Cerritos Wetlands DEIR NOP - comments  
**Attachments:** LCWA Rest handout.pdf

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Protect the Long Beach/Los Cerritos Wetlands supports the following statements

On Monday, April 8, 2019 5:00 PM, Anna Christensen <[achris259@yahoo.com](mailto:achris259@yahoo.com)> wrote:

To: Sally Gee, Los Cerritos Wetlands Authority

Re: LCWA Los Cerritos Wetlands Restoration Plan DEIR, NOP

From: Sierra Club, Angeles Chapter, Long Beach Area Group

Contact Person: Conservation Committee Representative, Anna Christensen  
[achris259@yahoo.com](mailto:achris259@yahoo.com)

Comments and concerns as follows:

1. The Site Map (Fig 2) - unclear, incorrect - most properties are designated by owner, one by its nickname, one, not at all. Since the LCWA is listing properties/owners at the present time, it should include its own 5 acre property at 2nd and Studebaker which has been included in the LCWA's previous maps of the Los Cerritos Wetlands (as the site of the proposed visitors center and land bridge over 2nd St connecting wetlands areas). As the "Pumpkin Patch" is included, it's owner should be listed, and plans for the entire site (including new oil operations and an office building) should be described in the EIR.
2. Misleading statement in this document and by representatives of the LCWA at the Public Scoping Meeting lead the public to conclude that conditions imposed on the Los Cerritos Wetlands and LCWA properties under the FEIR of the Los Cerritos Wetlands Restoration and Oil Consolidation Project are legal, final, and cannot be challenged or even discussed in comments to the LCWA's Los Cerritos Wetlands Restoration DEIR. "The EIR (for the Los Cerritos Wetlands Restoration and Oil Consolidation Project) was certified by the City of Long Beach City Council in July 2018. - No mention CCC approval - is this because of the lawsuit filed against the CCC for violating the Coastal Act in approving the Los Cerritos Wetlands Restoration and Oil Consolidation Project?
3. The restoration project is described as "habitat enhancement." However, many of the proposed alterations to the project area will damage or destroy existing wetlands, seasonal and salt marshes, and wildlife habitat. They will endanger wildlife, including protected species and migratory birds. The assumption that bulldozing and trenching to create additional tidal influence will improve a seasonal wetlands subject to sea rise must be questioned. The assumption that all non-native species are "invasive," have no value, and must be eradicated must be questioned. The need to



destroy existing plant communities to remove toxic soil must be questioned. The NOP is out of date in all these respects.

4. "Public Access" is a plus when seeking approval at the city and state levels as it gains the support of those who want to reassure constituents that the public will get to enjoy their natural resources up close and personal. It fails to take into account that for wildlife areas, public access is problematic to the extreme. No public access is warranted to ensure that the Los Cerritos Wetlands survive and thrive as a living ecosystem. No visitors center with access road, parking lot, and security lighting, no and walking trails within the wetlands. These are not "restoration" elements as they were not there in the first place. They may satisfy human wants and needs but they expand the human footprint and risk the present health and future well being of wildlife.
5. We submit that the Cultural Resources section is disrespectful to tribal peoples who have been excluded from participating in the NOP, distorts and omits tribal history, denies the proven existence of tribal cultural resources in the project area, fails to describe the Los Cerritos Wetlands as a Tribal Traditional Cultural Property and Sacred Site.
6. We concur with others that this is not the time to create/submit an EIR for the "restoration" of the Los Cerritos Wetlands and that a "Program EIR" is not appropriate.
7. We attach documents with which we concur and reserve the right to expand our comments at a later date.
8. The Los Cerritos Wetlands EIR (Program EIR) - "optimizing" 2015 plan/drafting EIR alters 2015 to allow for the oil extraction project -
9. It moves visitors center (including parking and roadway) onto wetlands ESHA, builds new berm on wetlands ESHA, breaches oil berm flooding wetlands ESHA with saltwater, polluting salt marsh, oil and other pipelines on ESHA crossing faultline, trenching/flooding will unearth/destroy tribal natural/cultural resources and sites, removal of non-natives destroys habitat for native species, and flooding ESHA, walking and bike trails disrupt wildlife
10. It uses outdated understanding of "restoration" - added tidal influence is not restoration, added public access is not restoration, not beneficial to wildlife preserve, not adjusted for sea level rise
11. It has a conflict of interest, use of Tidal Influence and other contractors involved in the oil extraction project

**From:** [Rececca Robles](#)  
**Sent:** Monday, April 8, 2019 4:07 PM  
**To:** Sally Gee  
**Cc:** [Anthony Morales](#)  
**Subject:** Comments on the Los Cerritos Wetlands Restoration DEIR, Notice of Preparation

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April 8, 2019

To: Sally Gee, Los Cerritos Wetlands Authority

Re: Comments on the Los Cerritos Wetlands Restoration DEIR, Notice of Preparation

Tribal concerns about the LCWA's NOP for the Los Cerritos Wetlands Restoration DEIR include:

1. Lack of inclusion of tribal perspectives in the preparation of the NOP (the basic design of the project).

- No evidence of consultation with any tribal entity, tribal member with expertise in tribal culture or tribal ethnobotany, or tribal individual with a previous history of involvement in protecting the Los Cerritos Wetlands. *"LCWA **will be** conducting consultation," LCWA **will consult** with tribes"*

- The NOP fails to include tribal cultural information from the 2015 Final Los Cerritos Wetlands Restoration Plan

2. The Cultural Resources Section asks if the project would *"Cause a substantial adverse change in the significance of an archaeological resource"* and further states, *"The program*

*area is in the vicinity of known archaeological resources and may have the potential to contain undocumented prehistoric and historic-period archaeological resources."* Written from an outdated Eurocentric perspective, the section ignores the current understanding and acknowledgement of **tribal cultural resources**, current laws (SB18), and current policies (CCC and State Lands Tribal Consultation Policies) which recognize California Indian peoples as sovereign living nations capable of planning and engaging in cultural resource management over public lands within their tribal territories and/or with which they maintain a cultural connection.

- The Cultural Resource section omits or misidentifies tribes having historic and cultural connection to the Los Cerritos Wetlands. The tribal history of the area identifies only one tribe by name, the Gabrielino, a name given by Spanish Missionaries, not that in current use. *From 1,000 years before present to approximately 1542 A.D., Los Angeles County and*



*Northern Orange County were occupied by the Gabrielino people (named after the Spanish Mission where many of them were baptized). ” The Tongva, Acjachemen and other Southern California tribes maintain their connection to the Los Cerritos Wetlands through ceremonial and social activities and by monitoring and opposing developments which threaten the health of the wetlands, the waterways, and the surrounding communities. • The Cultural Resources section omits highly significant tribal history and place names, including Puvungna, a major ceremonial center and the birthplace of Chinigchinich, the founder of a spiritual tradition practiced by multiple Southern California tribes today.*

- The Cultural Resources section improperly questions whether tribal cultural resources exist within the project area. It describes known village, burial and cultural sites as being “nearby” the wetlands rather than including the wetlands **within** the tribal communities of Puvungna and Motuuchenya. *“Nearby Native American sites are known to be located at California State University Long Beach, Rancho Los Alamitos Historic Ranch, and Heron Point.” “Native American burials have been encountered at sites in the vicinity of the program area (California Coastal Commission, 2018).” “If necessary, mitigation measures will be recommended to reduce potential significant impacts to historical resources.”*

- Tribal interests are assumed to be limited to their connection to archaeological sites and cultural resources including burial sites that could be disturbed/destroyed during excavation. Tribes are not acknowledged as living communities and governing bodies with a legal right to maintain a physical and spiritual connection to the Los Cerritos Wetlands. Nor are past and present tribal efforts to protect and use the wetlands for spiritual, cultural, and recreational purposes acknowledged.

- The NOP fails to acknowledge that the Tongva and Acjachemen recognize the Los Cerritos Wetlands as a Tribal Cultural Landscape, eligible to be listed as such by the NAHC .

- In ignoring tribal cultural perspectives, tribal historic and current connections to the Los Cerritos Wetlands, the NOP fails to identify potentially significant impacts to the Los Cerritos Wetlands and to the tribal peoples having physical and cultural connections to the project area. The proposed mitigation measures fail to acknowledge the continued and consistent comments by numerous tribal leaders that any and all disruption of natural areas do harm and should be avoided. *If necessary, mitigation measures will be recommended to reduce potential significant impacts to cultural resources.* It describes “potentially significant impacts” and “cultural resources” as follows: *Since the proposed program would require excavation and grading in some portions of the program area, ground-disturbing activities could unearth subsurface human remains” and “historic-period archaeological resources”*

- Restoration plans that include increased public access at the expense of wildlife, that involve the destruction of existing plant communities supporting wildlife, that employ pesticides and involve excavation and bulldozing, are in and of themselves destructive and disrespectful measures. Realistically, restoring the Los Cerritos Wetlands to the once magnificent river estuary beloved by its tribal occupants is not possible. To include tribal peoples in protecting what remains is essential. Failing to do so, the

NOP reveals a lack of true appreciation for the natural world and the original peoples of the land.

Sincerely,

Anthony Morales

Chief of Gabrielino/Tongva

Rebecca Robles

Acjachemen Descendent

**Hermosa Beach Office**  
Phone: (310) 798-2400  
**San Diego Office**  
Phone: (858) 999-0070  
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310-798-2400 Ext. 5

April 8, 2019

Ms. Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Road  
Azusa, CA 91702

*Via email [sgee@rmc.ca.gov](mailto:sgee@rmc.ca.gov)*

Re: Notice of Preparation and Scoping for Los Cerritos Wetlands Restoration  
Plan Environmental Impact Report

Dear Ms. Gee:

We submit these Notice of Preparation comments on behalf of the Los Cerritos Wetlands Land Trust (LCWLT). LCWLT has spent more than a decade educating and advocating for the protection and restoration of Los Cerritos Wetlands. The Los Cerritos Wetlands Authority (LCWA's) Los Cerritos Wetlands Restoration Plan (Project) presents a once-in-a-lifetime opportunity for comprehensive planning of the restoration of Los Cerritos Wetlands that will guide investment in restoration activities for decades. The restoration of the remaining extent of Los Cerritos Wetlands is one of LCWLT's primary goals, and LCWLT appreciates the opportunity to comment on the Project and its environmental review at an early stage of development.

The Project proposes restoration of wetlands, transitional, and upland habitats throughout 503 acres of the historic Los Cerritos Wetlands complex of southeast Long Beach and northwestern Seal Beach. Restoration would include remediation of contaminated soil, grading, revegetation, the construction of public access points, trails, and visitor centers, the construction of flood management facilities, and other activities in sensitive wetland and upland habitats.

LCWLT's major concerns include the following:

- Lack of specificity in the description of the Project, which, in turn could hamper restoration investment and implementation;
- Absence of an adequate range of alternatives that recognize the co-benefits of alternative wetlands connections that could provide green infrastructure benefits (e.g., enhanced flood control, water quality improvements) associated with a

bigger vision (e.g., options for connecting the wetlands in conjunction with bridge and road improvements that may also deliver superior water quality and flooding benefits); and

- A very strong emphasis on the protection of oil facilities in a Wetlands Restoration Project.

LCWLT submits these comments to ensure that the draft environmental impact report (EIR) thoroughly discloses, analyzes, and mitigates the many potential impacts of a large, long-term, and comprehensive restoration Project undertaken in sensitive wetlands with past, present, and future oil extraction. As the Initial Study correctly recognizes, unless all feasible alternatives are included and analyzed and the least-damaging alternatives are chosen, and unless all available mitigation is incorporated, the Project has the potential to cause significant and adverse impacts related to air quality, biological resources, greenhouse gases, aesthetics, water quality, hydrology and flooding, earthquake hazards, and hazardous materials, among others. LCWLT appreciates that the LCWA has chosen to prepare an EIR. But, more importantly, without the changes we suggest in this letter, the proposed Project will fail to realize the full potential of these important wetlands and environs.

## **I. A Clear and Complete Project Description is Necessary.**

The Initial Study describes the Project area and includes a range of activities that may occur in the 500 -acre Restoration Plan area, but it fails to provide readers with any idea which type of activities are proposed where. LCWLT expects greater clarity of specific Project activities, timelines, and exact locations will be provided in the EIR.

The Initial Study is unclear about which of the three alternatives described in the Conceptual Restoration Plan is the preferred alternative, or whether LCWA's preferred alternative is included in the Conceptual Restoration Plan at all. This information must be provided in the EIR's Project Description. Full analysis of all potential environmental impacts should occur for each of the no project, Minimum Alteration, Moderate Alteration, and Maximum Alteration alternatives, as each alternative will have very different footprints and impacts.

The Conceptual Restoration Plan is likely the only comprehensive planning document that will be prepared for Los Cerritos Wetlands restoration, and it is crucial to include all relevant properties in the Project area. The Project area already includes the privately-owned Pumpkin Patch, Synergy, and Hellman Ranch properties. It should be expanded to include the Hitchcock and AES properties. The Coastal Commission has already required restoration of the Hitchcock property as upland habitat, which is

consistent with the Project. This upland habitat will be crucial as lowland habitat is consumed by sea level rise.

The Project description should also clearly define Project phasing to ensure that short-term and long-term outcomes do not conflict. For example, constructing levees around the Hellman property to protect short-term oil interests could impede long-term flood relief from sea-level rise if Project levees prevent water from flowing into other portions of the wetlands.

## **II. Careful and Complete Studies are Needed to Determine the Baseline for CEQA Analysis.**

The adequacy of the CEQA analysis contained in the Wetlands Restoration Plan EIR will hinge on the accuracy of baselines used for environmental analysis. An accurate baseline is required to ensure that the Project's likely environmental impacts are neither exaggerated nor obscured. Mere projections of baseline information are insufficient for baseline analysis. (*Fairview Neighbors v. County of Ventura*, (1999) 70 Cal.App.4th 238; *Save Our Peninsula Committee v. Monterey Bd. of Supervisors*, (2001) 87 Cal.App.4th 99 [CEQA "requires that the preparers of the EIR conduct the investigation and obtain documentation to support a determination of preexisting conditions."]). Further, *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931 states that recitation of raw data without explanation of how such levels were derived or maintained "does not provide an adequate description of the existing environment." *Citizens for East Shore Parks v. State Lands Commission*, (2011) 202 Cal.App.4th 549 held the proper baseline for analysis of environmental impacts is "what [is] actually happening," not what might happen or should be happening.

Determining proper baselines may require updating the technical studies referenced in the Notice of Preparation. The hydrological study, for example, has become outdated in the face of new information about climate change and the likely impacts of sea level rise in Los Cerritos Wetlands.

The baseline is particularly important for determining whether the Project can or will increase wetland habitat. A comprehensive wetlands delineation of the Project area has not yet occurred, so it is unknown how many acres of federally or state-defined wetlands are present in the area or how many could be created by the Project. Once the baseline has been determined, quantifiable performance criteria must be established to determine whether new acres of wetlands have been created.

Related to this, the Project provides for financial benefits, presumably from continued oil extraction activities. Information about the existing "baseline" benefits will

need to be provided during the administrative process in order to make informed decisions, supported by substantial evidence, about the feasibility of Project alternatives and mitigation measures. This is particularly important given that some conflicts are inherent between wetland restoration and continued oil production on the same or adjacent lands.

### **III. The Biological Resources Analysis Must Discuss Impacts to Wetlands, Sensitive Species, and Habitat.**

LCWLT is pleased that the LCWA agrees that the Restoration Project, all of which will occur in Los Cerritos Wetlands, could have significant impacts on biological resources, including sensitive species and rare habitats. If alternative Project configurations are required to “avoid or substantially lessen” those impacts, the EIR must discuss these alternatives, as well. (Pub. Resources Code § 21002.) Any impacts to these wetlands would have corresponding impacts on species that inhabit these waterways, including the eggs and larvae of oceanic species that use wetlands as nurseries. Impacts to water quality due to the stirring up of sediment or pollutants contained in sediment or runoff from construction materials stored near water may also impact the regulatory status of waterways that are already listed as impaired on the 303(d) list. If any of these impacts may occur, they must be disclosed in the EIR.

LCWLT’s Notice of Preparation review committee noticed that the cited Habitat Assessment omitted any mention of aquatic macroinvertebrates, including marine invertebrates currently present in Steamshovel Slough. Macroinvertebrates are very responsive to environmental changes. The species composition of the macroinvertebrate community in a given location provides a useful measure of ecosystem health that can be used as a benchmark for determining whether restoration activities are providing benefits or harm. An adequate analysis of the Project’s biological resources will require a survey of aquatic macroinvertebrates present in the Project area, particularly in Steamshovel Slough. The biological resources analysis and its conclusions should not rely on the California Rapid Assessment Method (CRAM), which does not consider macroinvertebrates.

The Project area appears to include only a portion of the San Gabriel River. The Wetlands are located in and part of a larger watershed. As such, if the Project or its activities could have any impacts on the San Gabriel River, upstream or downstream, CEQA requires they be disclosed, analyzed, and properly mitigated.

The Initial Study for the City’s already-approved Southeast Area Specific Plan (SEASP) provided for a wetlands delineation study for the wetland portions of southeast Long Beach. LCWLT understands that a wetlands delineation for this area is currently

in-progress. LCWLT expects the EIR to include information from this delineation study, or from a separate LCWA delineation of the entire Project area. Any delineations relied upon by the Restoration Plan EIR must comply with all relevant EPA guidance to ensure that wetlands are properly delineated for future regulation and conservation.

#### **IV. The EIR Must Consider Cumulative Impacts with the Beach Oil Minerals Project.**

The City of Long Beach and California Coastal Commission recently approved Beach Oil Minerals' (BOM) Los Cerritos Wetlands Restoration and Oil Consolidation Project, which will cluster oil extraction activities on 10 acres of land at the LCWA and Pumpkin Patch parcels, thereby freeing up land at the Synergy and City of Long Beach parcels for habitat restoration. The BOM Project will require construction of a pipeline, and will considerably increase oil extraction and greenhouse gas emissions within the area of the Restoration Project. The EIR must consider any direct impacts of the BOM Project on the Restoration Project, as well as any cumulative impacts caused by the implementation and operation of both projects, in the same area, at the same time.

#### **V. Studebaker Road Cannot Be Widened or Extended.**

CEQA requires an analysis of the "whole of an action, which has the potential for physical impact on the environment." (CEQA Guidelines, § 15037.) If the Project will require or induce any other local road improvements, these must be disclosed, analyzed, and mitigated in the environmental document. LCWLT is particularly concerned about any improvements or reconfigurations that would increase pressure on roads surrounding the Los Cerritos Wetlands or that would lead to the widening or extension of Studebaker Road through the wetlands. There may be alternatives (e.g., improvements of the 2<sup>nd</sup> Street bridge and PCH) that would not only provide solutions to traffic management obviating any perceived need for the extension of Studebaker, but would also provide improved flows to the wetlands and superior restoration of this watershed. This is the time to identify and explore these broader options.

Any widening or expansion of Studebaker Road would have significant, adverse, and irreversible impacts on the health and viability of Los Cerritos Wetlands and the Restoration Project. Long Beach's SEASP acknowledges the regulatory constraints of such an extension, which would cause significant disruption of habitat values of environmentally sensitive habitat areas in violation of the Coastal Act. The EIR should clarify that widening or extension of Studebaker Road will not occur due to the significance of impacts on the wetlands associated with the extension and clarify it is not undergoing environmental review in this document. Project conditions of approval



should include a blanket prohibition on the widening or extension of Studebaker Road ideally because there are other solutions that benefit both wetlands and traffic flows.

#### **VI. Steamshovel Slough Cannot be Dredged or Filled.**

Although the three alternatives outlined in the Conceptual Restoration Plan purport to leave Steamshovel Slough in its current, pristine condition, the Initial Study states, “Aquatic and wetlands habitats in the program area, such as Steamshovel Slough, mudflats, as well as tidal channels surrounding the program area, could be removed, filled, or otherwise disturbed.” (IS, p. 28.) Fill or dredging of Steamshovel Slough would violate Coastal Act protections for both wetlands and environmentally sensitive habitat area. Consequently, in December 2018, the Coastal Commission altered Beach Oil Minerals’ restoration plans and imposed limits on the grading and earth movement proposed in the vicinity of Steamshovel Slough. LCWLT will defend Steamshovel Slough and its thriving wildlife from any and all disturbance. The EIR and its alternatives cannot consider any plans to dredge or otherwise alter Steamshovel Slough.

#### **VII. The EIR Must Contain Thorough Analysis of Sea level Rise.**

Sea level rise has already begun to impact planning in southeast Long Beach, and much of the Project area will experience sea level rise-induced flooding in the next century. The EIR must include an updated hydrology study, graphics, and analysis comparing existing water circulation with Project-induced water circulation, overlaid with the anticipated impacts of sea level rise. Worst-case scenarios for sea level rise should be used, as the damaging impacts of climate change have arrived sooner than anticipated. Here, sea level rise can adversely affect the Project, and the Project can also adversely affect the resilience of Los Cerritos Wetlands to sea level rise.

#### **VIII. Objectives Must be Clarified and Prioritized.**

The Restoration Plan’s objectives are to provide benefits including wetlands restoration, recreation, climate change adaptation, flood control, and oil infrastructure protection. However, it is unclear which objectives or benefits will control if a conflict arises. The best solution for protecting oil infrastructure against climate change-induced sea level rise is not necessarily the best solution to ensure the resilience of wetlands. The EIR must prioritize these objectives.

#### **IX. Alternatives to the Project Should Be Evaluated in the EIR.**

CEQA prohibits approval of projects with adverse environmental impacts if there are feasible alternatives. (Guidelines § 15021, subd. (a)(2).) The CEQA Guidelines

require an agency to “[d]isclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.” In order to implement this policy, the Guidelines specify that:

A public agency may approve a project even though the project would cause a significant effect on the environment *if* the agency makes a fully informed and *publicly disclosed decision* that: (a) There is no feasible way to lessen or avoid the significant effect....”

(Guidelines § 15043, emphasis added.)

The LCWA is obligated to evaluate a reasonable range of alternatives to the conceptual Wetlands Restoration Plan. (*Laurel Heights I, supra*, 47 Cal.3d at 400.) The LCWA “bears the burden of *affirmatively demonstrating* that . . . the agency’s *approval* of the proposed project *followed meaningful consideration of alternatives* and mitigation measures.” (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added; accord *Village Laguna of Laguna Beach v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1035.) As the Court has said, while an EIR is “the heart of CEQA”, the “core of an EIR is the mitigation and alternatives sections.” (*Citizens of Goleta Valley v. Bd. Of Supervisors* (1990) 52 Cal.3d 553, 564.) Preparation of an adequate EIR with analysis of a reasonable range of alternatives is crucial to CEQA’s substantive mandate to “prevent significant avoidable damage to the environment” when alternatives or mitigation measures are feasible. (Guidelines § 15002(a)(3).)

While “[a]n EIR need not consider every conceivable alternative to a project, ‘it must consider ‘a reasonable range of *potentially* feasible alternatives...’.” (Guidelines § 15126.6(a), emphasis added.) “The range of feasible alternatives [for an EIR] shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.” (Guidelines § 15126.6 (f).) “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (Guidelines § 15126.6(b).)

In addition to the proposed Restoration Plan and the “no project” alternative required by CEQA, the EIR should include a full analysis of the “Minimum Alteration” alternative, which will likely provide the greatest resilience for wetlands as sea level rises.

Additionally, LCWLT would like to see a more visionary alternative that consolidates existing oil operations, such as those ongoing at Hellman Ranch, to maximize the land available for near-term restoration as well as evaluates other options for connecting the wetlands to the watershed (e.g., possibly an improved, elevated bridge at 2<sup>nd</sup> Street and/or under roadways in conjunction with roadway improvements). The alternatives presented fail to describe or evaluate a wetland restoration plan that results in an integrated watershed with co-benefits to both green infrastructure (water quality and flood attenuation) but also to traffic and streetscapes. Planned and needed improvements to existing roads including 2<sup>nd</sup> Street, the 2<sup>nd</sup> Street Bridge and PCH provide an opportunity to revitalize both wetlands and community. In restoring the Colorado Lagoon, the community insisted on evaluating options that involved new and different infrastructure to achieve the best alternative. Specifically, in order to provide better circulation to the lagoon, the city and advocates called for removal of the westernmost portion of Marina Vista Park to create a tidal channel. Creating the channel not only requires part of the park to be removed, but also involves building two bridges to allow Eliot and Colorado streets to cross over the channel. This is the last opportunity to describe and evaluate visionary alternatives, with co-benefits that could also be funding opportunities, such as alternatives flow connections in conjunction with other hard and green infrastructure improvements.

The City of Long Beach and California Coastal Commission recently approved such an approach for the Beach Oil Mineral (BOM) project, which will consolidate oil operations currently occurring on the Synergy and City of Long Beach parcels onto less than 10 acres at the LCWA and Pumpkin Patch parcels. BOM's pursuit of the Project demonstrates the feasibility of the consolidation approach.

Finally, the Initial Study emphasizes the protection of ongoing oil and gas extraction in light of expected sea level rise through the construction of berms and updating of associated infrastructure. A reader of the Initial Study or Final Conceptual Restoration Plan is left wondering how much of the Restoration Plan is geared toward protecting oil infrastructure, as opposed to restoring necessary wetland habitat. The Initial Study is clear that funds have not been available to purchase oil production lands, but this may change. At some time in the future, oil operations will end through depletion of the oil field, reductions in demand as the energy industry transitions to new energy sources, or purchase of the land for wetland restoration. Accordingly, LCWLT requests consideration of an alternative that provides for the cessation of oil production in the Project area.

## **X. The EIR Must Consider the Impacts of Bike Paths and Visitor Facilities.**

LCWLT supports visitor access and appreciation of Los Cerritos Wetlands, so long as they may be accomplished without adverse impacts to existing or enhanced habitat. The Initial Study discusses the construction of pedestrian trails, bike paths, elevated pedestrian walkways, educational and interpretive features, viewing areas, overlooks, parking facilities, and visitor centers. The EIR must clearly describe proposed public access facilities, including trails, visitor centers, parking lots, and bike trails and their proposed locations. All potential environmental impacts of these new facilities must be disclosed and mitigated in the EIR. In order to avoid impacts, bike paths should not be located in wetlands, even if located atop levees. It has been LCWLT's understanding that existing bike paths were being maintained, but that no new bike paths were being considered. The EIR should clarify this point.

## **XI. Hydrology and Water Quality Impacts Require Consideration.**

The EIR must be based on a current hydrology study, as opposed to the existing, outdated study. Current sea level rise forecasts should be used to reevaluate plans to constrain or direct water flows with inlets, outlets, and levees, given that the impacts of sea level rise have already begun. More cutting-edge ideas than wetlands enclosed in levees should be considered, including alternative options for delivering and regulating flows described above. The EIR must also analyze whether the inlets, outlets, and protective levees under consideration for early-phase restoration will obstruct pathways to contain sea level rise. It is important that the Project not reduce the cities' or wetlands' resilience to climate change.

The Project's plans must also be consistent with the sea level rise adaptation plans of the Cities of Long Beach and Seal Beach.

## **XII. Mitigation of ALL Potentially Significant Impacts is Required.**

Finally, LCWLT seeks to ensure that any direct, indirect, or cumulative impacts of the Wetlands Restoration Plan are fully mitigated as required by CEQA. This will require an environmental review process that fully discloses the Project's likely significant environmental impacts and provides a thorough discussion of alternatives and mitigation measures designed to "avoid or substantially lessen" those environmental impacts as required by Public Resources Code § 21002. Any mitigation measures developed must be concrete and enforceable. (Pub. Res. Code 21081.6(b); *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2007) 155 Cal. App. 4<sup>th</sup> 425, 445 ["mitigation

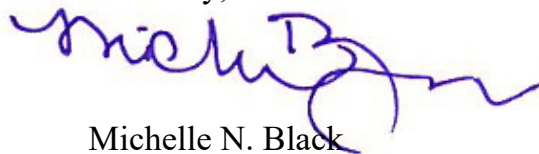
measures must be feasible and enforceable”])). Additionally, the environmental review document prepared for CEQA compliance must evaluate the efficacy of the mitigation measures proposed, as well as any significant environmental impacts that the mitigation measures may cause. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645; Guidelines s. 15126.4.)

Of particular importance will be mitigation measures designed to protect and preserve existing species as wetlands restoration and topographical modifications proceed. Grading and reconfiguration of the land in this sensitive area could have significant adverse impacts on Belding’s savannah sparrows, least bell vireos, and bubble snails, among others. Robust and enforceable mitigation measures must be imposed along with clear and quantifiable performance standards.

### **Conclusion.**

Thank you again for this opportunity to provide feedback on what may be Los Cerritos Wetlands’ most important planning process. The LCWLT appreciates the LCWA’s acknowledgement in the Initial Study of the Project’s many potentially significant impacts on important wetland, transitional, and upland habitats and on sensitive, threatened, and endangered species. We look forward to the release of the draft environmental impact report and to collaborating with the LCWA to ensure that the EIR thoroughly evaluates and fully mitigates the Project’s potential impacts on wetlands and the species that inhabit them. The public deserves a well-considered Project that properly prioritizes wetlands restoration over oil interests. Please contact us if you have any questions about these comments.

Sincerely,



Michelle N. Black

**From:** [Michael Zelniker](#)  
**Sent:** Monday, April 8, 2019 3:41 PM  
**To:** Sally Gee  
**Subject:** EIR Los Cerritos Wetland Public Comment

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Hello Sally Gee,

I'm writing to voice my concern about the Program EIR concerning the Los Cerritos Wetlands as currently proposed. I am the Co-Chair of the Los Angeles chapter of the Climate Reality Project. I sat in and spoke out against the proposal that happened in front of the California Coastal Commission concerning new oil drilling by BOM that took place in December.

Many of us in the environmental community are deeply troubled by that vote and are working to reverse that decision. We also understand that there is a lawsuit that has been filed that has yet to be heard or decided. So the idea that there would be a plan to "restore" the wetlands before this issue of new oil drilling in the wetlands is resolved makes absolutely no sense. This plan needs to be revisited and at the very least delayed.

Please let me know if there's anything else I can do. Thank you for your time in this matter.

Kind regards,

Michael

--

Michael Zelniker

Climate Reality Project

Co-Chair Los Angeles Chapter

323-851-5289 (office)

323-481-3962 (cell)

@michaelzelniker

[michaelzelniker.wordpress.com](http://michaelzelniker.wordpress.com)

**From:** [Molly Basler](#)  
**Sent:** Monday, April 8, 2019 2:20 PM  
**To:** Sally Gee  
**Subject:** Public Comment: Program EIR/Los Cerritos Wetlands

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Hello Sally Gee,

I'm writing to voice my concern about the Program EIR concerning the Los Cerritos Wetlands as currently proposed. I am an environmentalist/ activist Climate Reality Leader and a very concerned citizen in regard to the assault that is being put in NATURE, our natural habitats. I sat in and spoke out against the proposal that happened in front of the California Coastal Commission concerning new oil drilling by BOM that took place in December.

Many of us in the environmental community are deeply troubled by that vote and are working to reverse that decision. We also understand that there is a lawsuit that has been filed that has yet to be heard or decided. So the idea that there would be a plan to "restore" the wetlands before this issue of new oil drilling in the wetlands is resolved makes absolutely no sense. This plan needs to be revisited and at the very least delayed.

Please let me know if there's anything you need from me. Thank you for your time in this matter.

Kind regards,

Molly Basler

CONSCIOUS LIVING



Climate Reality Leader🌐

The Climate Reality Project

State and National Issues Chair/West LA Democratic Club

[Mollybasler.com](http://Mollybasler.com)

**From:** [Sally Gee](#)  
**Sent:** Tuesday, March 19, 2019 12:46 PM  
**To:** [Reema Shakra](#); [Ryan Todaro](#)  
**Subject:** FW: Los Cerritos restoration plan

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Response to NOP

**From:** mrs.boerum <[boerum245@gmail.com](mailto:boerum245@gmail.com)>  
**Sent:** Wednesday, March 13, 2019 11:31 AM  
**To:** Sally Gee <[sgee@rmc.ca.gov](mailto:sgee@rmc.ca.gov)>  
**Cc:** Tom Boerum <[trb1075@sbcglobal.net](mailto:trb1075@sbcglobal.net)>  
**Subject:** Los Cerritos restoration plan

Goodmorning,

My question regarding the wetlands is how will this effect my flood insurance for my home at 6251 Majorca Circle, Long Beach?

### **1-Amy LeSage**

Name: Amy LeSage

Address: 6621 E. Pac Coast Hwy, Ste 130, Long Beach, 90803

Organization: Enjoy Healing Center

Email: amylesage@gmail.com

My name is Amy LeSage. I'm a business owner leasing an office space at 6621 E. Pac Coast Hwy, Ste. 130. I am an acupuncturist and Chinese medicine physician. My work requires a noise-free environment. I am concerned that when work begins at the pumpkin patch site and Long Beach City Property Site (directly behind my office), the noise pollution, air pollution, vibrations from construction, greenhouse gas emissions + other toxic chemicals as well as the affected water quality will significantly negatively impact my small business. In fact, I feel most of my patients will not come to a place of healing that is toxic.

I would like to know the timeline of the COMP projects and what you are doing to accommodate small businesses like mine that are in the path of this project.

Please contact me and advise. Thank you!

### **2-Kim Garvey**

Name: Kim Garvey

Address: 389 Haines Avenue

Organization: N/A

Email: kjgarvey12@verizon.net

- 1.) What is proposed project to be analyzed? Why not presented at this meeting?
- 2.) How come triangular-shaped property along Loynes (near Studebaker) not included in project/program boundary? Would like to see this included in EIR. Otherwise what can/will happen there?
- 3.) How come LCWA property at the corner of 2<sup>nd</sup> St. /Studebaker not included? Could be public/interpretive center. (Agree it is not suitable for habitat restoration)

Janice Dahl  
6212 E. Vista Street  
Long Beach, CA 90803  
(562) 594-0902

April 7, 2019

Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Road  
Azusa, CA 91702

Via email: sgee@rmc.ca.gov

Subject: Los Cerritos Wetlands Restoration Plan

Dear Ms. Gee:

After thoroughly reading the Los Cerritos Wetlands Restoration Plan, I find the report unacceptable and lacking in areas that are critical to the successful restoration of Los Cerritos Wetlands, and misguided in its goals.

The most inconceivable aspect of the plan is the possibility of filling-in Steamshovel Slough! Environmental Science Associates, the author of the Plan, wants to destroy the very habitat that's at stake. 20 years ago I made the video, "The Lost Jewel of the Coast, Los Cerritos Wetlands" that was made on Steamshovel Slough. I've thought that it should be updated, since it appeared that the path to the restoration wetlands complex was going in the right direction. Now I read that the wetlands are in more dire straits than 20 years ago. ESA writes on page 28 under c): "Aquatic and wetland habitats in the program area such as **Steamshovel Slough**, mudflats, as well as the tidal channels surrounding the program area, **could be removed, filled** or otherwise disturbed." How did this line of thinking get into the plan and how was it reviewed and allowed to stay in the Plan? Steamshovel Slough needs 100% protection and must not be altered or disturbed.

The Plan totally overlooks marine invertebrates. These creatures are essential to thriving wetlands: they are a food source for birds and fish, are one the elements that has kept Steamshovel Slough pristine, among many other benefits. Analysis of the aquatic and benthic macroinvertebrates should be one of the cornerstones of the Plan, but there is complete omission. It takes a simple search of the internet to see that the study and protection of marine invertebrates are an essential element of wetlands restoration.

With further reading, one concludes that the Plan's goal is not for wetlands restoration, preservation and protection, but for a park. Throughout the Plan it is stated that there will be creation of BIKE TRAILS through the wetlands! Bike trails have never been a part of Los Cerritos Wetlands restoration. Bike trails and wetlands restoration are not compatible. What's alarming and sends up red flags is that there is ample mention of creating bike trails BUT NO ANALYSIS OF THE MARINE INVERTEBRATES! Bike trails through the wetlands **MUST** be removed from the Plan.

The Plan emphasizes the protection of the existing oil wells, and "mitigation measures will be recommended to reduce potential significant impacts to mineral resources." The Plan wants to use precious wetlands restoration funding and resources to protect oil wells. Yet, the Plan has no plans to protect the marine invertebrates. Funding and resources will be used to create bike paths through the wetlands, yet, there's no analysis, funding or protection of the marine invertebrates?

Another troubling aspect of the restoration that's not specifically stated in the Plan, but it is elsewhere, is the removal of the palm trees. The birds have had to adapt to environments that have been shaped by mankind. Their natural habitats have been destroyed so they adapt to what's left for them. Now, that will be taken from them in Los Cerritos Wetlands. The only reasonable means of removing the palm trees is to phase them out while at the same time planting mature trees suitable as nesting habitat that are native to and around the local wetlands. The Audubon Report, "Birds & Climate Change" states "While some species may be able to adapt, others will have nowhere to go. Many of our most cherished birds, including the Bald Eagle, Brown Pelican, and Common Loon, face an increased risk of extinction." The scorched earth method of removing trees, listed as invasive in one of the Plans habitat assessments, after the birds have struggled to adapt is unacceptable.

After reading the Plan it was evident that there was no final restoration goal. Los Cerritos Wetlands Authority has developed three models from minimal to maximum touch. Whether or not one agrees with the three models, at least there was a platform for discussion and direction for the restoration. I would add a fourth model...ultra-minimal touch considering sea level rise. This would be the least destructive to this fragile habitat and allow time for the animals to adapt.

In conclusion, Los Cerritos Wetlands Authority needs a new Plan that's relevant to the restoration, preservation and protection of Los Cerritos Wetlands, that I look forward to reading.

Respectfully,



Janice Dahl

Ps; I am mailing to you The Audubon Report, "Birds & Climate Change."

Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Road Azusa, CA 91702  
Email: [sgee@rmc.c.gov](mailto:sgee@rmc.c.gov)

## Comments on the Los Cerritos Wetlands Restoration DEIR

I have attended a number of meetings on this issue, including the Scoping Meeting on March 21, 2019. Today, I went on the Intotheloscerritoswetlands site and read the EIR information; however, now my computer is telling me this is not a secure site, so was unable to see the current restoration plan. Based on what I was able to read, these are my scoping comments.

1. This plan is premature. The present Draft EIR is being based on SEADIP, an outdated zoning plan. A new zoning plan, SEASP, has not been approved by the CA Coastal Commission. The LCW Restoration EIR should not be done until SEASP has received all of the necessary approvals.
2. Another reason this Restoration Plan is premature is that the Los Cerritos Wetlands Authority has not acquired all of the land included in the restoration plan. The figure 2 map shows much of the wetlands, including the Synergy site, as still being in private hands. There is a law suit challenging the CA Coastal Commission's approval of the Oil Drilling on the LCWA 5 Acres and Pumpkin Patch. The Restoration Plan EIR should not be done until this law suit has been decided.
3. If the EIR is based on SEADIP, it must include the section on Population and Housing, as SEADIP allows housing on a portion of the Synergy property.
4. I object to a Program EIR. We have already seen how SEADIP has become outdated. It is very difficult to plan even 10 years into the future, much less 20 years and beyond, especially with climate change and sea level rise. Quote from page 11 of EIR: "The construction activities would be phased over time as properties become available for acquisition by LCWA. The timing of construction at each site is dependent on multiple variables, including property acquisition, removal of oil infrastructure, wells, and related facilities, availability of funding, and permit approvals. Construction on properties currently under the ownership of LCWA or in the process of being transferred to the LCWA is expected to occur in the near-term (within approximately 10 years). Construction on properties that would be connected to or are associated with operation of the Haynes Cooling Channel or that may require more time than the near-term time frame, is expected to occur in the mid-term (between approximately 10-20 years), once the channel is decommissioned. The timing of the long-term phase depends on decommissioning of existing oil operations and could vary from 20 years (where agreements are already in place) to longer time frames. For oil operations that do not have agreements in place with LCWA, it is expected that overall level of oil and natural gas production would continue until production decreases to below economically viable levels, after which oil production would stop." It is obvious that there is no rush or need to get this EIR done at this time.
5. Wildfire was eliminated from the Environmental Factors Potentially Affected. It is stated on page 68: "The program area is not located in a very high hazard severity zone". There have been a number of fires in the Los Cerritos Wetlands in the recent past. The area is especially vulnerable during the hot, dry summers. Parched vegetation in the middle of oil fields are a potential wildfire danger and needs to be included in the EIR.
6. I agree with the statement on page 70 that "the proposed program could result in potentially significant impacts with regard to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services (fire protection, police protection and parks), recreation, transportation and traffic, tribal cultural resources, and utilities and service systems. Implementation of the proposed program could result in significant impacts that may result in substantial adverse effects on human beings." I do not agree with the statement that these can all be mitigated.

7. I do not agree with the statement on pg. 12 “Ecosystem restoration includes actions that will restore more natural ecosystem processes (physical and biological) to disturbed habitats within the program area. Restoration of more natural ecosystem processes through actions like grading, modifying tidal connections, and revegetation, will lead to more extensive and higher functioning wetland, transition and upland habitats.” Many biologists would agree that bulldozing existing habitat, removing berms, and poisoning plants with herbicide does not produce a higher functioning wetland. There is a current school of thought that non-native plants can often provide suitable habitat for the inhabitants of the wetlands. I suggest that if it is absolutely necessary to remove the non-native trees, that they be replaced with native trees of the same size before the trees are destroyed. There should be no toxic herbicides allowed in the wetlands for any plants, native or non-native

Another quote states: “Potential disturbances to sensitive habitats and species during operation of the proposed program would be minimized through effective design of public access areas to keep people on trails and out of habitat areas, and predator management.” Please include the methods of ‘predator management’ which will be used. Most biologists would say that eliminating any critter from the wetlands can possibly destroy the natural web of life.

#### 8. Public Access and Visitor Facilities

Page 12: “Potential public access improvements and visitor amenities would include construction of new pedestrian trails and bike paths, elevated perimeter pedestrian walkways, educational or interpretive features, viewing areas with overlooks, new and improved parking facilities, and visitor centers.” This is not a wetlands restoration plan; this a recreation center plan for humans. There should be no bikes or picnic areas in the wetlands. All pedestrian trails should be on the perimeters of the site. There should be no concrete or asphalt paths. The visitor center should be off site—there is a diagonal piece of property by Loynes Dr. and Studebaker or state lands on PCH which might be used now that the LCWA five acres at 2nd and Studebaker has been removed from the Figure 2 map. (By the way, that map labels the Los Alamitos Recharging Basin as the ‘Retarding’ Basin.)

#### 9. MANDATORY FINDINGS OF SIGNIFICANCE —

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?”

I believe the answer to all of these questions is ‘Yes’ and urge the LCWA to wait until SEASP is approved and BOM has received all the necessary permits and finishes the removal of its oil extracting equipment from the wetlands before beginning any restoration plans.

Questions:

One of the goals mentioned is to maximize wildlife corridors between Los Cerritos Wetlands and adjacent natural areas. Since I am unable to access the Restoration Plan, I wonder about the location of these?

Will the EIR address the Mitigation Bank planned for the northern part of the wetlands?

**From:** [Sally Gee](#)  
**Sent:** Friday, April 12, 2019 1:49 PM  
**To:** [Reema Shakra](#); [Ryan Todaro](#)  
**Cc:** [Raiven Greenberg](#); [eric@tidalinfluence.com](mailto:eric@tidalinfluence.com)  
**Subject:** Fw: Los Cerritos Wetlands Restoration NOP comments  
**Attachments:** Scoping comments for LCW EIR 4819.docx;  
Scoping comments for LCW EIR 4819.pdf

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One more...

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**From:** anngadfly@aol.com <anngadfly@aol.com>  
**Sent:** Monday, April 8, 2019 7:20 PM  
**To:** Sally Gee  
**Subject:** Fwd: Los Cerritos Wetlands Restoration comments

Dear Sally,

I submitted my comments today, but just noticed the e-mail was returned because of an incorrect address, which was on the website. (<http://intoloscerritoswetlands.org/wp-content/uploads/2019/03/Scoping-Meeting-Comment-Card-FINAL.pdf>).

I believe that the comment time should be extended and a corrected e-mail address be posted as several people used the incorrect one.  
Ann Cantrell

-----Original Message-----

**From:** anngadfly <anngadfly@aol.com>  
**To:** sgee <sgee@rmc.c.gov>  
**Sent:** Mon, Apr 8, 2019 4:45 pm  
**Subject:** Los Cerritos Wetlands Restoration comments

Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Road Azusa, CA 91702  
Email: [sgee@rmc.c.gov](mailto:sgee@rmc.c.gov)

Comments on the Los Cerritos Wetlands Restoration DEIR

I have attended a number of meetings on this issue, including the Scoping Meeting on March 21, 2019. Today, I went on the Intoloscerritoswetlands site and read the EIR information; however, now my computer is telling me this is not a secure site, so was unable to see the current restoration plan. Based on what I was able to read, these are my scoping comments.

1. This plan is premature. The present Draft EIR is being based on SEADIP, an outdated zoning plan. A new zoning plan, SEASP, has not been approved by the CA Coastal Commission. The Los Cerritos Wetlands Restoration EIR should not be done until SEASP has received all of the necessary approvals.
2. Another reason this Restoration Plan is premature is that the Los Cerritos Wetlands Authority has not acquired all of the land included in the restoration plan. The figure 2 map shows much of the wetlands, including the Synergy site, as still being in private hands. There is a law suit challenging the CA Coastal Commission's approval of the Oil Drilling on the LCWA 5 Acres and Pumpkin Patch. The Restoration Plan EIR should not be done until this law suit has been decided.
3. If the EIR is based on SEADIP, it must include the section on Population and Housing, as SEADIP allows housing on a portion of the Synergy property.
4. I object to a Program EIR. We have already seen how SEADIP has become outdated. It is very difficult to plan even 10 years into the future, much less 20 years and beyond, especially with climate change and sea level rise. Quote from page 11 of EIR: "The construction activities would be phased over time as properties become available for acquisition by LCWA. The timing of construction at each site is dependent on multiple variables, including property acquisition, removal of oil infrastructure, wells, and related facilities, availability of funding, and permit approvals. Construction on properties currently under the ownership of LCWA or in the process of being transferred to the LCWA is expected to occur in the near-term (within approximately 10 years). Construction on properties that would be connected to or are associated with operation of the Haynes Cooling Channel or that may require more time than the near-term time frame, is expected to occur in the mid-term (between approximately 10-20 years), once the channel is



decommissioned. The timing of the long-term phase depends on decommissioning of existing oil operations and could vary from 20 years (where agreements are already in place) to longer time frames. For oil operations that do not have agreements in place with LCWA, it is expected that overall level of oil and natural gas production would continue until production decreases to below economically viable levels, after which oil production would stop." It is obvious that there is no rush or need to get this EIR done at this time.

5. Wildfire was eliminated from the Environmental Factors Potentially Affected. It is stated on page 68: "The program area is not located in a very high hazard severity zone". There have been a number of fires in the Los Cerritos Wetlands in the recent past. The area is especially vulnerable during the hot, dry summers. Parched vegetation in the middle of oil fields are a potential wildfire danger and needs to be included in the EIR.
6. I agree with the statement on page 70 that "the proposed program could result in potentially significant impacts with regard to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services (fire protection, police protection and parks), recreation, transportation and traffic, tribal cultural resources, and utilities and service systems. Implementation of the proposed program could result in significant impacts that may result in substantial adverse effects on human beings." I do not agree with the statement that these can all be mitigated.

7. I do not agree with the statement on pg. 12 "Ecosystem restoration includes actions that will restore more natural ecosystem processes (physical and biological) to disturbed habitats within the program area. Restoration of more natural ecosystem processes through actions like grading, modifying tidal connections, and revegetation, will lead to more extensive and higher functioning wetland, transition and upland habitats." Many biologists would agree that bulldozing existing habitat, removing berms, and poisoning plants with herbicide does not produce a higher functioning wetland. There is a current school of thought that non-native plants can often provide suitable habitat for the inhabitants of the wetlands. I suggest that if it is absolutely necessary to remove the non-native trees, that they be replaced with native trees of the same size before the trees are destroyed. There should be no toxic herbicides allowed in the wetlands for any plants, native or non-native

Another quote states: "Potential disturbances to sensitive habitats and species during operation of the proposed program would be minimized through effective design of public access areas to keep people on trails and out of habitat areas, and predator management." Please include the methods of 'predator management' which will be used. Most biologists would say that eliminating any critter from the wetlands can possibly destroy the natural web of life.

#### 8. Public Access and Visitor Facilities

Page 12: "Potential public access improvements and visitor amenities would include construction of new pedestrian trails and bike paths, elevated perimeter pedestrian walkways, educational or interpretive features, viewing areas with overlooks, new and improved parking facilities, and visitor centers." This is not a wetlands restoration plan; this a recreation center plan for humans. There should be no bikes or picnic areas in the wetlands. All pedestrian trails should be on the perimeters of the site. There should be no concrete or asphalt paths. The visitor center should be off site—there is a diagonal piece of property by Loynes Dr. and Studebaker or state lands on PCH which might be used now that the LCWA five acres at 2nd and Studebaker has been removed from the Figure 2 map. (By the way, that map labels the Los Alamitos Recharging Basin as the 'Retarding' Basin.)

#### 9. MANDATORY FINDINGS OF SIGNIFICANCE —

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?"

I believe the answer to all of these questions is 'Yes' and urge the LCWA to wait until SEASP is approved and BOM has received all the necessary permits and finishes the removal of its oil extracting equipment from the wetlands before beginning any restoration plans.

#### Questions:

One of the goals mentioned is to maximize wildlife corridors between Los Cerritos Wetlands and adjacent natural areas. Since I am unable to access the Restoration Plan, I wonder about the location of these?

Will the EIR address the Mitigation Bank planned for the northern part of the wetlands?

Thank you for your consideration of my comments.

Ann Cantrell  
Protect the Los Cerritos/Long Beach Wetlands  
3106 Claremore  
Long Beach, CA 90808

Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Road Azusa, CA 91702  
Email: [sgee@rmc.c.gov](mailto:sgee@rmc.c.gov)

## Comments on the Los Cerritos Wetlands Restoration DEIR

I have attended a number of meetings on this issue, including the Scoping Meeting on March 21, 2019. Today, I went on the Intotheloscerritoswetlands site and read the EIR information; however, now my computer is telling me this is not a secure site, so was unable to see the current restoration plan. Based on what I was able to read, these are my scoping comments.

1. This plan is premature. The present Draft EIR is being based on SEADIP, an outdated zoning plan. A new zoning plan, SEASP, has not been approved by the CA Coastal Commission. The Los Cerritos Wetlands Restoration EIR should not be done until SEASP has received all of the necessary approvals.
2. Another reason this Restoration Plan is premature is that the Los Cerritos Wetlands Authority has not acquired all of the land included in the restoration plan. The figure 2 map shows much of the wetlands, including the Synergy site, as still being in private hands. There is a law suit challenging the CA Coastal Commission's approval of the Oil Drilling on the LCWA 5 Acres and Pumpkin Patch. The Restoration Plan EIR should not be done until this law suit has been decided.
3. If the EIR is based on SEADIP, it must include the section on Population and Housing, as SEADIP allows housing on a portion of the Synergy property.
4. I object to a Program EIR. We have already seen how SEADIP has become outdated. It is very difficult to plan even 10 years into the future, much less 20 years and beyond, especially with climate change and sea level rise. Quote from page 11 of EIR: "The construction activities would be phased over time as properties become available for acquisition by LCWA. The timing of construction at each site is dependent on multiple variables, including property acquisition, removal of oil infrastructure, wells, and related facilities, availability of funding, and permit approvals. Construction on properties currently under the ownership of LCWA or in the process of being transferred to the LCWA is expected to occur in the near-term (within approximately 10 years). Construction on properties that would be connected to or are associated with operation of the Haynes Cooling Channel or that may require more time than the near-term time frame, is expected to occur in the mid-term (between approximately 10-20 years), once the channel is decommissioned. The timing of the long-term phase depends on decommissioning of existing oil operations and could vary from 20 years (where agreements are already in place) to longer time frames. For oil operations that do not have agreements in place with LCWA, it is expected that overall level of oil and natural gas production would continue until production decreases to below economically viable levels, after which oil production would stop." It is obvious that there is no rush or need to get this EIR done at this time.
5. Wildfire was eliminated from the Environmental Factors Potentially Affected. It is stated on page 68: "The program area is not located in a very high hazard severity zone". There have been a number of fires in the Los Cerritos Wetlands in the recent past. The area is especially vulnerable during the hot, dry summers. Parched vegetation in the middle of oil fields are a potential wildfire danger and needs to be included in the EIR.
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# Los Cerritos Wetlands Restoration Plan Program Environmental Impact Report

CEQA Scoping Meeting  
March 21, 2019  
7:00pm-8:30pm



## Comment Card

Please use the space below to provide comments you may have regarding the Los Cerritos Wetlands Restoration Plan Program Environmental Impact Report, including areas to address, potential mitigation measures, and/or alternatives to consider. Please use the back if necessary:

KEEP UP THE GREAT WORK!

Considering that the original SEADIP plan was to develop another 'Naples,' it is so gratifying to see that we are trying to maximize these wetlands to its original state.

Douglas Frankfeld

Name: Douglas Frankfeld Organization (if applicable): \_\_\_\_\_  
Address: 3847 Pine Ave. Long Beach, CA 90807  
Email: dougenfeld@msn.com

Please submit comments tonight or send by:

Post: Sally Gee  
Los Cerritos Wetlands Authority  
100 N. Old San Gabriel Canyon Road  
Azusa, CA 91702

Email: [sgee@rmc.c.gov](mailto:sgee@rmc.c.gov)

Comments must be submitted by April 8, 2019.  
Please note that these comments will become part of the public record.

# Los Cerritos Wetlands Restoration Plan Program Environmental Impact Report

CEQA Scoping Meeting  
March 21, 2019  
7:00pm-8:30pm



## Comment Card

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We like the "Flood Risk Management Levee with Trail Access" concept. It is our understanding this levee is planned for the Central site and will wrap around on both the 2<sup>nd</sup> St. side and Marketplace side of Los Cerritos Wetlands. Comparing the previous BOM plan for the Synergy Oil (or Northern) site, this levee follows the same path as the new Synergy Oil pipeline and the levee will sit between the pipeline and the wetlands/future restoration, which would address concerns of oil spills getting into the wetlands (note the previous and separate BOM plan stated a risk of oil spill in wetlands on the Marketplace side from their new pipeline) which LCWA's levee solves the concern. Levees of this type might also be a good feature for other wetlands areas adjacent to any oil operations. The dual use of the levee for public access trails (walking only) is a good plan providing public enjoyment and view of the wetlands, birds and wildlife from a perimeter trail.

The plan concept outlined in the LCWA studies to restore a diverse habitat with a mix of tidal channels, mudflats, saltmarsh, brackish/freshwater marsh and uplands (including buffer zones) will help support an array of birds, wildlife, native plants and aquatic creatures and is a much needed habitat on the Pacific Flyway, also crucial to migratory birds as a rest stop on their long journeys. The study also mentions wildlife corridors with adjacent natural areas in the region, this is good as a restored Los Cerritos Wetlands would host even more species which would travel locally between areas such as Colorado Lagoon, Sim's Pond, Alamitos Bay, Seal Beach National Wildlife Refuge and Bolsa Chica Ecological Reserve. With the extent of the loss of coastal habitat and wetlands, every acre we can preserve and restore back to this important habitat type matters.

We look forward to participating in this process in the future. In general, we are in agreement with the basic project objectives outlined in the Initial Study document, Project No. D170537 dated March 2019, which are stated as follows:

### **c) Project Objectives**

As documented in the Los Cerritos Wetlands Final Conceptual Restoration Plan, the goals and objectives of the proposed program are presented here (Moffatt & Nichol, 2015):

1. Restore tidal wetland process and functions to the maximum extent possible
  - a. Increase estuarine habitat with a mix of tidal channels, mudflat, salt marsh, and brackish/ freshwater marsh and ponds.

- b. Provide adequate area for wetland-upland ecotone and upland habitat to support wetlands.
  - c. Restore and maintain habitat that supports important life history phases for species of special concern (e.g., federal and state listed species), essential fish habitat, and migratory birds as appropriate.
2. Maximize contiguous habitat areas and maximize the buffer between habitat and sources of human disturbance.
    - a. Maximize wildlife corridors within the LCW Complex and between the LCW Complex and adjacent natural areas within the region.
    - b. Incorporate native upland vegetation buffers between habitat areas and human development to mitigate urban impacts (e.g., noise, light, unauthorized human encroachment, domestic animals, wastewater runoff) and reduce invasion by nonnative organisms.
    - c. Design the edges of the LCW Complex to be respectful and compatible with current neighboring land uses.
  3. Create a public access and interpretive program that is practical, protective of sensitive habitat and ongoing oil operations, economically feasible, and will ensure a memorable visitor experience.
    - a. Build upon existing beneficial uses.
    - b. Minimize public impacts on habitat/wildlife use of the LCW Complex.
    - c. Design interpretive concepts that promote environmental stewardship and the connection between the wetlands and the surrounding community.
    - d. Solicit and address feedback from members of the surrounding community and other interested parties.
  4. Incorporate phasing of implementation to accommodate existing and future potential changes in land ownership and usage, and as funding becomes available.
    - a. Include projects that can be implemented as industrial operations are phased out and other properties are acquired over the near-, mid- and long-term (next 10 years, 10-20 years, and 20+ years).
    - b. Investigate opportunities to restore levels of tidal influence that are compatible with current oil leases and neighboring private land holdings.
    - c. Remove/realign/consolidate existing infrastructure (roads, pipelines, etc.) and accommodate future potential changes in infrastructure, to the maximum extent feasible.
  5. Strive for long-term restoration success.
    - a. Implement an adaptive management framework that is sustainable.
    - b. Restore habitats in appropriate areas to minimize the need for long-term maintenance activities that are extensive and disruptive to wildlife.
    - c. Design habitats that will accommodate climate changes, e.g., incorporate topographic and habitat diversity and natural buffers and transition zones to accommodate migration of wetlands with rising sea levels.
    - d. Provide economic benefit to the region.
  6. Integrate experimental actions and research into the project, where appropriate, to inform restoration and management actions for this project.
    - a. Include opportunities for potential experiments and pilot projects to address gaps in information (e.g., effect of warm river water on salt marsh ecosystem) that are protective of sensitive habitat and wildlife and that can be used to adaptively manage the restoration project.
  7. Include areas on the site, where appropriate, that prioritize research opportunities (such as those for adaptive management) over habitat sensitivities.

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**Please submit comments tonight or send by:**

**Comments must be submitted by April 8, 2019.**

Post: Sally Gee Please note that these comments will become part Los Cerritos Wetlands Authority of the public record.

100 N. Old San Gabriel Canyon Road Azusa,  
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