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Governor's Office of Planning & Research

Ms. Sally Gee
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APR 18 2019

STATE CLEARINGHOUSE

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.
- 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*), wooly 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 occidnetalis*). 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 inter-connected 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 Agreement¹.
- 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."

¹A notification package for a LSA may be obtained by accessing the CDFW's web site at 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, subs. (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 (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at 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;

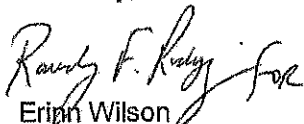
d) a local seed and cuttings and planting schedule; e) a description of the irrigation methodology; f) measures to control exotic vegetation on site; g) specific success criteria; h) a detailed monitoring program; i) contingency measures should the success criteria not be met; and, j) identification 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.

Sincerely,



Erinn Wilson
Environmental Program Manager I

cc: CDFW
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