



November 11, 2020

Via email to sam.schuchat@scc.ca.gov

Sam Schuchat, Executive Director
State Coastal Conservancy
Oakland, California

Re: Agenda Item #6 (Los Cerritos Wetlands Southern Area Planning and Permitting)

Dear Mr. Schuchat:

Sea and Sage Audubon Society (SASAS) wishes to lend its support to the proposed grant of \$250,000 to the Los Cerritos Wetlands Authority (LCWA). SASAS is chapter of the National Audubon Society, serving Orange County, California, with nearly 3,000 members dedicated to protecting birds and bird habitats, including scarce coastal wetlands so critical along the Pacific Flyway. Restoring the degraded remnants of these wetlands is an important goal and we applaud the LCWA for its efforts, especially in an urban location where large numbers of people can benefit from proximity of nature.

SASAS is familiar with the Southern Los Cerritos Wetlands because some of our members engage in regular bird surveys of the project site, reporting their observations to the LCWA. Some of the nearby wetlands that have experienced similar 20th century degradation, such as at Bolsa Chica, have experienced re-birth due to restoration projects in which the Coastal Conservancy has played a key role. We hope the same success can be achieved in the Los Cerritos Wetlands complex.

We hope that the final restoration project design will:

- Incorporate a range of habitat types similar to those native to this site before the many impacts of the 20th century.
- Include public access opportunities, but only to the extent that they are compatible with the functioning of the system and the survival of its wildlife.
- Engage with Native American communities in this area and treat the project site with cultural as well as environmental sensitivity.

Thank you for your support for these critical natural resources!

Sincerely,

Susan Sheakley
Conservation Committee Chair

cc: joel.gerwein@scc.ca.gov, mfp2001@hotmail.com, elizabeth@lcwlandtrust.org,
mstanley@mc.ca.gov

*Sea and Sage Audubon Society's mission is to protect birds and other wildlife, and their habitats,
through education, citizen science, research, and public policy advocacy.*

From: anngadfly@aol.com <anngadfly@aol.com>

Sent: Wednesday, November 18, 2020 3:54 PM

To: SCC Public Comment <publiccomments@scc.ca.gov>

Cc: achris259@yahoo.com <achris259@yahoo.com>; cmoore@algalita.org <cmoore@algalita.org>; ksharper01@cs.com <ksharper01@cs.com>; rebrobles1@gmail.com <rebrobles1@gmail.com>; vbickf123@aol.com <vbickf123@aol.com>; corlisslee@aol.com <corlisslee@aol.com>; hoorae1@aol.com <hoorae1@aol.com>; jweins123@hotmail.com <jweins123@hotmail.com>; mbcotton@hotmail.com <mbcotton@hotmail.com>; mpshogrl@msn.com <mpshogrl@msn.com>; renee_matt@live.com <renee_matt@live.com>

Subject: Coastal Conservancy 11/19/20

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Agenda Item 6. Consideration and possible authorization to disburse up to \$250,000 to the Los Cerritos Wetlands Authority to prepare plans, environmental documents, and permit applications for wetland restoration and public access facilities in the southern area of the [Los Cerritos Wetlands](#) in Seal Beach.

Dear Decision Makers:

Thank you for removing this issue from last month's Consent Calendar and holding a public hearing tomorrow.

I urge you to delay this Disbursement of funds to the Los Cerritos Wetlands Authority until the Program Environmental Impact Report for the Los Cerritos Wetlands has been approved by all responsible agencies, including the CA Coastal Commission.

If you read the many comments to the PEIR, you will see that there are a number of unanswered questions, such as why certain wetland areas were omitted from this document; the destruction of all valuable salt flats and much uplands by flooding with salt water; eighteen foot high berms; and inadequate mitigations.

As described in your summary, the Los Cerritos Wetlands, although degraded and full of oil operations, currently contains a large number of native plants, birds, mammals, reptiles, invertebrates and insects. In the Southern Section, *"The existing tidal channel is narrow and has a muted connection to the San Gabriel River via a culvert. This tidal connection has created conditions that support 27 acres of degraded salt marsh, which provides habitat for several special status species that have been documented in the project area, including the Belding's savannah sparrow, California least tern, loggerhead shrike, Northern harrier, yellow-breasted chat, salt marsh wandering skipper, California boxthorn, Coulter's goldfields, Lewis' evening primrose, and southern tarplant.* Conceptual designs call for enhancing these existing wetlands by increasing tidal exchange but avoiding grading this area to

preserve these resources.' I fail to understand how flooding existing habitat with salt water can be called 'enhancement'.

The PEIR also acknowledges that construction and recreational activities are likely to destroy habitat for these species, but that the mitigations will bring back all displaced plants and animals "in years to come".

Section 3.3. Biological Resources: *For special-status plants cannot be avoided, they shall be incorporated into the proposed program's restoration design at a minimum ratio of 1:1 (one plant planted for every one plant removed, . . .*

The CA Coastal Commission requires a replacement ratio of 4:1 replacement for Special-status wetlands plants. 1:1 replacement is definitely inadequate.

Mitigation Measure BIO-3: Belding's Savannah Sparrow Breeding Habitat. *Prior to the commencement of activities within the program area, a qualified biologist shall map suitable Belding's savannah sparrow habitat as the location and amount of suitable habitat is anticipated to change over time. Project activities shall be limited to July 16 through February 14 within suitable coastal marsh habitat to avoid impacts to breeding Belding's savannah sparrow. Suitable Belding's savannah sparrow breeding habitat that will be impacted by the proposed program shall be created within the program area at a minimum ratio of 1:1 (area created:area impacted). . .*

Again, 1:1 created habitat is inadequate. And where are the Savannah Sparrows and other birds supposed to go during non nesting season? **Savannah Sparrows, along with many other wetlands birds do not migrate, but live and forage in the wetlands all year. Where are the mitigations for construction in their foraging areas from July 16 through Feb. 14?**

The PEIR contains many more issues. No plans, EIR's, or permits should be issued before the approval and certification of the Program EIR. Please delay approval of this disbursement until PEIR certification by all authorities.

Sincerely,
Ann Cantrell
Sierra Club Los Cerritos Wetlands Task Force
Citizens About Responsible Planning/CARP

From: Anna Christensen <annachristensen259@gmail.com>

Sent: Wednesday, November 18, 2020 16:59

To: SCC Public Comment

Subject: Agenda Item 6

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

The Los Cerritos Wetlands Task Force opposes Agenda Item #6, a grant of \$250,000 to the Los Cerritos Wetlands Authority "to prepare plans, environmental documents, and permit applications for wetland restoration and public access facilities in the southern area of the Los Cerritos Wetlands in Seal Beach."

We ask that you review our comment letter and slide show under public comments attached to this agenda item.

This funding is simply anticipatory destruction of biological and tribal cultural resources. The LCWA's PEIR has not been approved nor has a Coastal Permit for the PEIR been issued. This staff report is misleading. The Conservancy should withhold funding of a piecemeal project.

Of special note in the staff report:

The PEIR does not require that individual projects, such as this one, complete full EIRs.

"The project includes planning for public trails, benefiting the park-poor Los Angeles area, and will facilitate educational programming benefitting underserved communities."

The project is not in the LA area, it is in Orange County, in the affluent community of Seal Beach. In addition to Gum Grove Park in Seal Beach, the Bolsa Chica Wetlands and multiple parks on Alamitos Bay in Long Beach make this a park-rich area.

In general, tribal representatives expressed the need for care, respect, and tribal monitoring given the potential for tribal artifacts and possibly human remains to occur in the LCW Complex overall, as well as support for overall restoration goals and a desire to remain informed and involved.

Tongva and Acjachemen tribal leaders who have consistently advocated for the preservation of the existing ecosystem and oppose the LCWA's plan for this traditional tribal property and sacred site continue to be disregarded. The project cannot accommodate demands that there be no bulldozing, trenching, flooding or construction of berms, raised roads, and bulding on the wetlands.