

**CALIFORNIA COASTAL COMMISSION**

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# W7a

Filed: 4/11/16  
180th Day: 10/8/16  
Staff: S. Richmond-SD  
Staff Report: 4/21/16  
Hearing Date: 5/11/16

## STAFF REPORT: CONSENT CALENDAR

**Application No.:** 6-16-0248

**Applicant:** San Elijo Lagoon Conservancy/County of San Diego, Parks & Rec. Dept.

**Agent:** Doug Gibson

**Location:** San Elijo Lagoon Inlet, Cardiff State Beach south of inlet and west of Coast Highway 101/Cardiff Reef parking lot, Seaside Terrace north of Cardiff State Beach/Seaside parking lot and west of Coast Highway 101, and San Elijo Lagoon Dunes east of Coast Highway 101, Encinitas, San Diego County.

**Project Description:** Removal of sand and cobbles from lagoon inlet as necessary over a period of five years to maintain tidal flow and placement of excavated material on adjacent Cardiff State Beach and two dune habitat enhancement sites.

**Staff Recommendation:** Approval with Conditions

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### SUMMARY OF STAFF RECOMMENDATION

The proposed project would dredge sand and cobbles from the San Elijo Lagoon Inlet to keep the inlet open to protect and enhance the biological productivity of the lagoon. The Commission has a long history of issuing permits for inlet maintenance operations to

6-16-0248 (SELC/CSDPRD)

improve water quality conditions and increase the diversity and abundance of species in the lagoon. The project is identical to the previous five-year permit for maintenance dredging (CDP # 6-11-014), except that in addition to placing excavated material south of the inlet mouth on the adjacent Cardiff State Beach for beach nourishment, out of the 4,000-30,000 cubic yards of material excavated in each opening, up to 200 cubic yards and 1,800 cubic yards of sand would be placed at Seaside Terrace and San Elijo Lagoon Dunes, respectively. The purpose of these two additional sand placement sites, located on immediately west and east of Coast Highway 101 near Cardiff State Beach, is to enhance 2.07 acres of dune habitat. Overall, the project is expected to improve the health of San Elijo Lagoon's biological resources. The Commission's ecologist has reviewed the project and determined that both new sites are appropriate for sand placement and will protect and enhance sensitive habitat.

**Special Condition #1** limits the term of the permit to five years to allow the Commission to reassess the need and limitations on opening the lagoon mouth in the future and **Special Condition #2** restricts dredging activities to certain dates to avoid adverse impacts on sensitive species or the biological productivity of the area and to avoid adverse impacts to public beach access during high use times of the year. In the new dune habitat enhancement areas, **Special Condition #3** requires conformance with submitted plans, which limit the volume of sand placement and propose construction methods, and **Special Condition #4** requires biological surveys, monitoring, and a 100-foot buffer around active nests to ensure breeding is not disturbed. Finally, **Special Condition #5** requires annual monitoring reports to be submitted to the Commission in order to evaluate the effects of the lagoon inlet openings on coastal resources and the success of dune habitat enhancement activities. As conditioned, the project will be consistent with biological protection policies of Chapter 3 of the Coastal Act, and no adverse impacts to coastal resources are anticipated.

Commission staff recommends **approval** of coastal development permit application 6-16-0248 as conditioned.

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**EXHIBITS**

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## I. MOTION AND RESOLUTION

### Motion:

*I move that the Commission **approve** the coastal development permit applications included on the consent calendar in accordance with the staff recommendations.*

Staff recommends a **YES** vote. Passage of this motion will result in approval of all the permits included on the consent calendar. The motion passes only by affirmative vote of a majority of the Commissioners present.

## II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

## III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Timing of Permit.** This permit is valid for a period of five years from the date of Commission action. Future lagoon inlet openings beyond this date will require a coastal development permit from the California Coastal Commission or its successor in interest.

2. **Timing of Inlet Maintenance Work.** As proposed, inlet openings shall only occur with the authorization of the State Department of Fish and Wildlife that the dredging, on the date proposed, will not cause adverse impacts on sensitive or endangered species or the biological productivity of the area, and shall adhere to the following criteria:

- a. No maintenance dredging may occur 14 days before a holiday or scheduled beach event.
- b. No equipment shall be stored on the beach or in the public parking lot overnight, and all equipment must be removed from the beach by Friday.
- c. No work shall occur during the two-week period spanning Easter of any year.
- d. Commission staff shall be notified in writing, by phone, or by email prior to commencement of any dredging.

Openings during the summer months shall be avoided if possible; however, if openings are necessary during the summer, the following additional requirements will be met:

- e. No work shall occur on Fridays, weekends or holidays during the summer months of any year (Memorial Day weekend to Labor Day).

3. **Dune Enhancement.** The applicant shall comply with the submitted Dune Enhancement Plan attached to this staff report as Exhibit #2, which includes the following provisions:

- a. 200 cubic yards or less of sand placed at Seaside Terrace using a dump truck in the initial year and a front-end loader in subsequent years to avoid disturbing dune vegetation establishment; and
- b. 1,800 cubic yards or less of sand placed at San Elijo Lagoon Dunes, where sand would be sidecast from Coast Highway 101 and then spread by bucket brigade (since no heavy machinery is allowed in San Elijo Lagoon).

Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission-approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

4. **Sensitive Species Dune Monitoring.** During the nesting season (March through September), a qualified biologist shall conduct a site survey for evidence of active nests no more than 72 hours prior to any sand placement. If an active nest is located, then a qualified biologist shall monitor the nest daily and prohibit project activities within 100 feet of the nest, or until the young have fledged and are independent of the adults or the nest is otherwise abandoned. The monitoring biologist shall make practicable recommendations to reduce disturbance in the vicinity of the active nest, such as working in other areas and installing symbolic fencing around the nests. The monitoring biologist shall halt construction activities if he or she determines that the placement activities may

be disturbing or disrupting nesting activities. The monitoring biologist shall verify compliance with these avoidance boundaries and verify that the nesting effort has finished in a written report.

The results of the pre- and post-construction surveys shall be documented by the monitoring biologist and submitted to the San Diego office of the California Coastal Commission.

5. **Monitoring Report.** On an annual basis by May 1<sup>st</sup> of each year, the applicant shall submit for the review and written approval of the Executive Director, a monitoring report for the project. The report shall summarize the effects of the multiple openings, including any changes in the tidal prism caused by external factors (such as upstream development impacts, extreme storm conditions, unusual tides, etc.) that may have contributed to the need for the lagoon inlet openings as well as the project's impacts on the biological productivity of the lagoon and on public access and recreation. The report will also summarize the success of dune habitat enhancement activities and include recommendations for any necessary changes or modifications to the project.

Specifically, the annual report shall include the following information:

- a. The date of the opening(s) which occurred, along with the date of each subsequent closure and the date of any maintenance dredging.
- b. Photos of the beach in front of the lagoon inlet prior to and during dredging activities.
- c. Success reducing invasives and restoring native vegetation in the dune enhancement areas.
- d. Presence of California Least Tern and Western Snowy Plover in the dune enhancement areas.
- e. Any noted adverse impacts on lagoon, beach, or dune resources or adjacent park and recreation areas resulting from dredging or disposal activities, and recommendations to avoid or mitigate these impacts in the future.

The report shall be submitted annually beginning the first year after Commission approval of the permit.

## IV. FINDINGS AND DECLARATIONS

### A. PROJECT DESCRIPTION

The proposed project consists of dredging sand and cobbles from the San Elijo Lagoon Inlet as needed over a five-year period to maintain a tidal flow. The amount of dredged material will vary, but most openings would involve the removal of approximately 4,000-30,000 cubic yards of sand and cobble material. Excavated material would be placed on the adjacent Cardiff State Beach and two additional upland sites, known as Seaside Terrace and San Elijo Lagoon Dunes. Both dredging and placement of excavated material would take place in the City of Encinitas (**Exhibit #1**).

The main goal of the project is to keep the inlet open to protect and enhance the biological productivity of the lagoon. Generally, winter storms deposit sand from the Pacific Ocean in the inlet and intermittently block tidal flow. While cool weather helps keep oxygen levels in the lagoon at safe levels for aquatic organisms, rising temperatures in the spring increase the demand for oxygen, which can lead to decreased oxygen levels in the water (hypoxia) and excessive algal blooms (eutrophication) that can be toxic to fish and other species. In general, maintaining tidal flow into the lagoon improves water circulation and overall water quality by preventing extreme fluctuations in temperature and salinity. This prevents aquatic organisms from enduring long periods of stressful conditions and thereby enhances the biological productivity of the lagoon.

Another goal of the project is to use excavated material for beach nourishment and dune habitat enhancement. Beach nourishment improves coastal recreation and protects shoreline development from erosion from high tides and waves, while dune habitat enhancement creates coastal habitat, often with minimal management. It should be noted that a permit application for the San Elijo Restoration Project, which would increase tidal prism for the entire lagoon, is currently being reviewed by staff, and if approved by the Commission, could begin construction within a year (CDP # 6-16-0275). The intent of the subject project is to continue annual inlet maintenance operations in the interim.

As described in detail below, the Commission has a long history of permit approvals for dredging to open the inlet of San Elijo Lagoon. The subject project is identical to the most recent permit approved by the Commission in April 2011 (CDP # 6-11-014), except that it includes placing a small quantity of excavated material at two new, additional upland disposal sites: up to 200 cubic yards of sand at Seaside Terrace and up to 1,800 cubic yards of sand at San Elijo Lagoon Dunes.

In the past, dredged material has been exclusively used for beach nourishment by depositing it in or within reach of the surf line for natural distribution into the littoral cell and on higher beach elevations at Cardiff State Beach, just south of the inlet and west of Coast Highway 101/Cardiff Reef parking lot. The proposed development involves placement of a majority of the excavated material at Cardiff State Beach; however, two new placement sites for a small volume of sand have been identified at Seaside Terrace, north of Cardiff State Beach/Seaside parking lot and west of Coast Highway 101, and San Elijo Lagoon Dunes east of Coast Highway 101 to enhance existing dune restoration

efforts at these locations (**Exhibit #2**). Details regarding these new sites are summarized below:

1. Seaside Terrace (1.34 acres): Before asphalt was removed from the site, it was part of the Seaside parking lot. The site is still driven on by vehicles and is lined with cobbles and covered by concrete, sand, and areas of remnant asphalt. The San Elijo Lagoon Conservancy (SELC) actively manages the area for several exotic invasive plant species and some dune plant species have established on the minimal sand covering the site.
2. San Elijo Lagoon Dunes (0.73 acres): Over the last 15 years, SELC has conducted several habitat restoration and enhancement projects to increase the ecological function of the site, and in 2015, removed the last section of arrowweed. While there is a thin sand layer covering the site, additional sand is needed so that dune plants can compete with faster growing exotic invasive plant species. Jurisdictional wetland delineation was performed and found that the site is not a wetland. The Commission's ecologist concurs with this delineation and believes both sites are appropriate for sand placement.

At Seaside Terrace, sand would be deposited using a dump truck in the initial year and a front-end loader in subsequent years to avoid disturbing dune vegetation establishment. At this location, the depth of sand added would increase the elevation by 3 feet or less, and SELC would plant the areas with seed stock collected within the lagoon. At the other site, San Elijo Lagoon Dunes, sand would be side cast from Coast Highway 101 and then hand spread by bucket brigade since there is no heavy machinery allowed within San Elijo Lagoon. At this location, the depth of sand added would increase the elevation by 3-3.5 feet in the zone nearest Coast Highway 101 and by 1 foot or less in the zone along the eastern edge, and sand placement is not expected to adversely impact existing dune plant species. **Special Condition #3** requires the applicant to conform to the parameters of the proposed sand placement plan.

In addition to supporting additional dune vegetation, the applicant has indicated that placement of sand at these sites will make them more attractive to sensitive bird species. Last year, at Seaside Terrace, two pairs of Snowy Plovers nested and laid eggs for the first time in over a decade. The eggs didn't survive due to predation. This year, at Seaside Terrace and San Elijo Lagoon Dunes, California Least Tern and Western Snowy Plover have been observed. To ensure that the proposed placement of sand does not have any adverse impacts on these sensitive species, **Special Condition #4** requires that a qualified biologist conduct a site survey no more than 72 hours prior to any sand placement for evidence of active nests during the nesting season (March through September), and if active nests are observed, a qualified biologist shall monitor the nest daily and prohibit project activities within 100 feet of the nest, or until the young have fledged and are independent of the adults or the nest is otherwise abandoned.

Monitoring reports submitted by SELC in compliance with past permits document that inlet maintenance operations have been a success. Water quality conditions have improved and the diversity and abundance of species observed in the lagoon have drastically increased. In addition, inlet maintenance operations have had very few



negative impacts on recreation. During the past year two inlet operations, June 2014 and June 2015, the inlet area around Cardiff State Beach has been posted with precautionary advisory signs due to inlet maintenance operations a total of 14 days and no additional beach postings were needed because bacteria did not exceed approved levels. **Special Conditions #1** and **#2** limit the permit length to five years, to allow for re-evaluation of the site at that time, and limit the timing of the dredging to avoid adverse impacts to sensitive species or public beach access during high use times of the year.

Finally, **Special Condition #5** requires the applicants continue to provide annual monitoring reports to document the impact of inlet maintenance operations on the lagoon and the success of dune habitat enhancement activities. The report will also include any adverse impacts on lagoon, beach, and dune resources as well as adjacent park and recreation areas resulting from dredging or disposal activities, and provide recommendations to avoid or mitigate these impacts in the future.

While the proposed development is located within the City of Encinitas, it is located within the Commission's area of original jurisdiction and as such, the standard of review is Chapter 3 policies of the Coastal Act, with the City's Local Coastal Program (LCP) used as guidance.

## **B. HISTORY**

The subject project would be the 13<sup>th</sup> permit approved by the Commission for inlet maintenance operations in San Elijo Lagoon. This long history of issuing permits includes authorizations for one-time openings of the lagoon inlet and dredging of the lagoon's main tidal channel (e.g., CDP #s 6-88-463, 6-89-109, 6-89-241, 6-90-128, 6-90-250, 6-91-3, 6-91-258, 6-93-12 and 6-93-194). Originally, openings were proposed based on certain criteria related to dissolved oxygen, salinity, and other water quality conditions as indicators for determining appropriate times to open the lagoon inlet in order to protect the lagoon environment. The Commission has also approved a number of permits and amendments for opening the lagoon inlet that were proposed as experiments to allow the lagoon inlet to remain open for a longer period of time, and involved the removal of a more substantial amount of material both in the lagoon inlet and in the channel east of the Highway 101 bridge (e.g., CDP #s 6-91-3-A, 6-94-15, 6-95-32, 6-95-142). In some instances the work was proposed to occur whether or not the previously proposed criteria were present. The openings conducted under these permits allowed the inlet to remain open for several months longer than the previous openings had accomplished.

In January 1997, the Commission approved a permit for multiple openings of the lagoon over a 2-year period (CDP # 6-96-120). The intent of the project was to keep the lagoon inlet open as long as possible—continuously, if possible under the applicant's funding constraints. As proposed, the same criteria regarding dissolved oxygen, salinity, and other water quality conditions as had been proposed in the past had to be met in order for the openings to occur.

Given the beneficial effects of maintaining tidal flow, the Commission has since approved numerous additional permits allowing for dredging to keep the lagoon open on an as-needed basis, with certain restrictions to avoid impacting public access and

recreation. In May 1999, in March 2005, and April 2011, the Commission approved five-year permits for multiple openings of the lagoon that did not require that specific biological criteria be reached prior to implementation of dredging (CDP #s 6-99-12, 6-05-07, 6-11-014). Due to a number of potential future projects in the vicinity of the lagoon that could impact the lagoon, such as the widening of Interstate 5 or double-tracking the railroad line, the term of the permits was limited to five years to allow the Commission the ability to reassess the need and limitations on opening the lagoon inlet in the future. These recent permits allowed opening of the lagoon inlet whenever it closed, provided that the following conditions were met: no maintenance dredging may occur 14 days before a holiday or scheduled beach event; no equipment shall be stored on the beach or in the public parking lot overnight, and all equipment must be removed from the beach by Friday; no work shall occur during the two-week period spanning Easter of any year; the U.S. Fish and Wildlife Service, the California Department of Fish and Wildlife, the California State Parks and Recreation Department, and the Commission must be notified prior to the commencement of dredging; and openings during the summer months shall be avoided if possible, and if openings are necessary during the summer, no work shall occur on Fridays, weekends or holidays during the summer months of any year (Memorial Day weekend to Labor Day). As previously stated, these same conditions have been placed on the subject permit.

### **C. BIOLOGICAL RESOURCES**

Section 30231 of the Coastal Act requires that coastal waters are protected and runoff minimized. Section 30233 limits development in open coastal waters, wetlands, estuaries, and lakes to specific permitted uses where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects. Coastal Act policies 30240 and 30251 protect sensitive habitats and restrict the alteration of natural landforms.

The project will not result in erosion or adverse impacts to water quality. The proposed development is a restoration project permitted under Section 30233 and, as conditioned, will not have an adverse impact on any sensitive habitat. Thus, the project is consistent with the resource protection policies of Chapter 3 of the Coastal Act.

### **D. PUBLIC ACCESS/PARKING**

As conditioned, the proposed development will not have an adverse impact on public access to the coast or to nearby recreational facilities. Therefore, the proposed development, as conditioned, conforms to Sections 30210 through 30213, Sections 30220 through 30224, Section 30252 and Section 30604(c) of the Coastal Act.

### **E. LOCAL COASTAL PLANNING**

The subject site is located in an area of original jurisdiction, where the Commission retains permanent permit authority and Chapter 3 of the Coastal Act remains the legal standard of review. As conditioned, the proposed development is consistent with Chapter

3 of the Coastal Act. Approval of the project, as conditioned, will not prejudice the ability of the City of Encinitas to continue to implement its certified LCP.

**F. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

(G:\San Diego\Reports\2015\6-16-0248 SELC-CSDPRD Inlet maintenance-dune enhancement stf rpt.docx)

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

- Coastal Development Permit # 6-11-014 (San Elijo Conservancy & County of San Diego, Parks and Rec. Dept.), approved April 2011
- Coastal Development Permit # 6-10-001 (San Elijo Conservancy & CA Department of Fish and Game), approved May 2010
- 2014-2015 San Elijo Lagoon Water Quality Report by San Elijo Lagoon Conservancy

Coast Highway 101

City of Encinitas

Interstate 5

Normal disposal site for inlet maintenance program

Inlet excavation boundary

San Elijo Lagoon

Site 2. San Elijo lagoon Dunes

Site 1. Seaside Terrace

City of Solana Beach

Site 1. Seaside Terrace. Requesting to place up to 200 cubic yards on site for dune, plover, and tern enhancement.

Site 2. San Elijo Lagoon Dune/Coastal Strand. Requesting to place up to 1,800 cubic yards on site where invasive arrowweed was removed. This will enhance the area for sensitive plants and birds.

EXHIBIT NO. 1

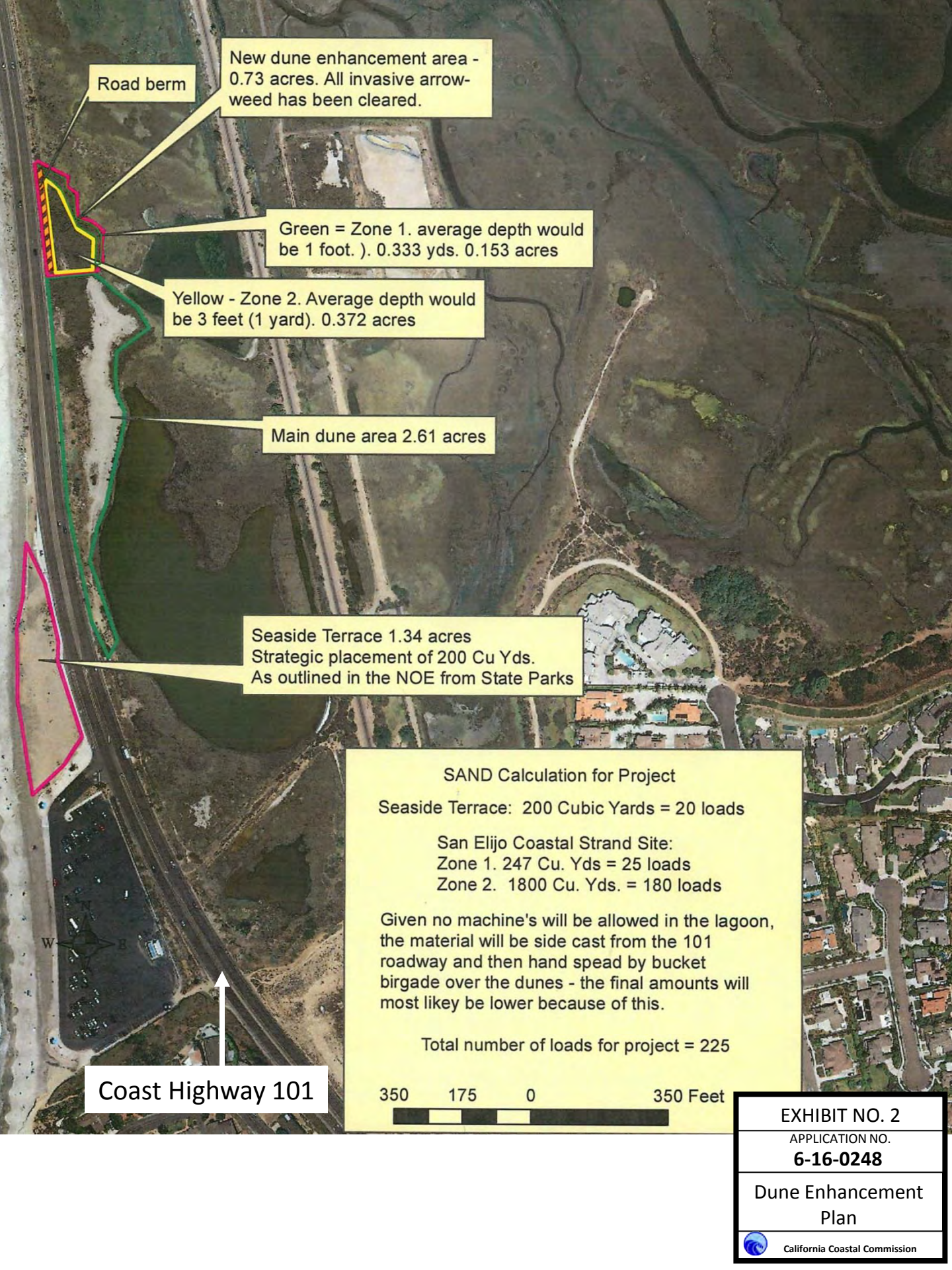
APPLICATION NO.

6-16-0248

Vicinity Map



California Coastal Commission



Road berm

New dune enhancement area - 0.73 acres. All invasive arrowweed has been cleared.

Green = Zone 1. average depth would be 1 foot. (. 0.333 yds. 0.153 acres

Yellow - Zone 2. Average depth would be 3 feet (1 yard). 0.372 acres

Main dune area 2.61 acres

Seaside Terrace 1.34 acres  
Strategic placement of 200 Cu Yds.  
As outlined in the NOE from State Parks

**SAND Calculation for Project**

Seaside Terrace: 200 Cubic Yards = 20 loads

San Elijo Coastal Strand Site:  
Zone 1. 247 Cu. Yds = 25 loads  
Zone 2. 1800 Cu. Yds. = 180 loads

Given no machine's will be allowed in the lagoon, the material will be side cast from the 101 roadway and then hand spread by bucket birgade over the dunes - the final amounts will most likey be lower because of this.

Total number of loads for project = 225

W B

Coast Highway 101

350 175 0 350 Feet

**EXHIBIT NO. 2**  
APPLICATION NO.  
**6-16-0248**

**Dune Enhancement Plan**

 California Coastal Commission



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



March 18, 2016

Coastal Commission Staff  
California Coastal Commission  
7575 Metropolitan Drive #103  
San Diego, CA 92108

Re: San Elijo Lagoon Conservancy Five Year Inlet Maintenance Permit Application

The California Department of Fish and Wildlife supports the efforts of the San Elijo Lagoon Conservancy (SELC) in maintaining the inlet of the lagoon. A Memorandum of Understanding between the three managing entities of the Reserve (CDFW, County of San Diego, and SELC) charges SELC with the planning and implementation of enhancement and restoration activities. These projects are discussed in detail at regularly scheduled Reserve Oversight meetings and have the support of the managing partners. The efforts of SELC have greatly improved the function of the ecosystems within the reserve through these enhancements projects.

The Department of Fish and Wildlife supports the modification in this permit to allow sand to be placed on the coastal strand / dune area of the west basin, which parcel is managed by the Department - Parcel # 26301134). The northern portion of this area was taken over by the invasive *Pluchea sericea* (Arrowweed) and over the last two years, was removed through the restoration efforts of the SELC. In order to bring back the function of the coastal strand habitat, sand is needed to cover up the organic duff layer and help prevent further invasion of other invasive plants. The SELC current plan of adding a small amount of sand each year is appropriate for this site. The planned monitoring for the site will help guide the decision to add more sand in following years.

If you have any questions regarding this letter of support, please contact Tim Dillingham at the letterhead address, email at [tim.dillingham@wildlife.ca.gov](mailto:tim.dillingham@wildlife.ca.gov), by telephone at (858) 467-4250 or by fax at (858) 467-4235.

Sincerely,

Richard Burg  
Lands Program Supervisor  
South Coast Region

cc: Tracie Nelson, Department of Fish and Wildlife  
Tim Dillingham, Department of Fish and Wildlife  
Terri Stewart, Department of Fish and Wildlife  
Lands Chron File

*Conserving California's Wildlife Since 1870*

EXHIBIT NO. 3
APPLICATION NO. <b>6-16-0248</b>
Letters of Support from Resource Agencies
California Coastal Commission



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



In Reply Refer To:  
FWS-16B0197-16CPA0286

APR 20 2016

Ms. Sarah Richmond, Coastal Planner  
California Coastal Commission  
7575 Metropolitan Drive #103  
San Diego, California 92108

Subject: Support for Sand Placement at Seaside Terrace and San Elijo Dunes as part of San Elijo Lagoon Conservancy's Coastal Development Permit Application for Inlet Operations

Dear Ms. Richmond:

The U.S. Fish and Wildlife Service (Service) is writing in support of San Elijo Lagoon Conservancy's (Conservancy) inclusion of a sand placement project (project) at Seaside Terrace and San Elijo Dunes as part of their Coastal Development Permit Application for Inlet Operations. Seaside Terrace covers 1 acre at South Cardiff State Beach, immediately west of Pacific Coast Highway and north of the State Beach parking lot. The San Elijo Dunes covers 4 acres in the southwest corner of the West Basin of San Elijo Lagoon, between the Santa Fe railroad and the Pacific Coast Highway.

This placement of sand is consistent with our Coastal Program mission to protect and recover Federal Trust Species (threatened and endangered species, migratory birds, and inter-jurisdictional fish) by supporting voluntary restoration and enhancement of high-priority coastal habitats. We are providing technical support and have awarded \$61,500 in funding to the Conservancy for the enhancement of dune habitats at both the Seaside Terrace and San Elijo Dunes. The addition of 200 cubic yards of sand at Seaside Terrace and 4,200 cubic yards of sand at San Elijo Dunes sand will provide physical structure associated with dune habitats that are currently lacking at these sites. This project will help reverse the decline in acreage of native dune habitats that has occurred in Southern California with coastal development. Further, it will also expand available habitat to native dune plants and animals, and could support recovery of the western snowy plover [*Charadrius nivosus nivosus* (C. alexandrinus n.); a federally threatened and a state species of special concern] and the California least tern [*Sternula antillarum browni* (*Sterna a. b.*); a federal and state endangered species] by providing roosting and/or breeding habitat.

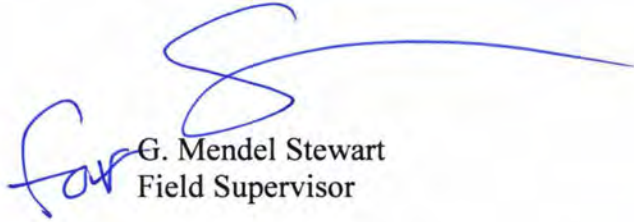


Ms. Richmond (FWS-16B0197-16CPA0286)

2

Please contact Carolyn Lieberman of this office at 760-431-9440, extension 240, if you have any questions regarding this letter of support.

Sincerely,



G. Mendel Stewart  
Field Supervisor

cc. Doug Gibson, San Elijo Lagoon Conservancy