**CORRESPONDENCE for CDP-0007-19**

STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY GAVIN NEWSOM, *GOVERNOR*

**CALIFORNIA COASTAL COMMISSION**
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105-2219
FAX (415) 904-5200
TDD (415) 904-5400

# F13a

## Federal Consistency Determination CD-0007-19

## (Corps of Engineers, Los Angeles Co.)

## December 11, 2020

## CORRESPONDENCE

**CD-0007-19 CORRESPONDENCE**

**From:** Canepa, Amanda@Wildlife <Amanda.Canepa@Wildlife.ca.gov>
**Sent:** Friday, December 4, 2020 9:18 AM
**To:** Barrera, Alexis@Coastal <Alexis.Barrera@coastal.ca.gov>; Energy@Coastal <EORFC@coastal.ca.gov>
**Cc:** Ota, Becky@Wildlife <Becky.Ota@wildlife.ca.gov>; Wilkins, Eric@Wildlife <Eric.Wilkins@wildlife.ca.gov>; bryant.chesney@noaa.gov <bryant.chesney@noaa.gov>
**Subject:** Public Comment on December 2020 Agenda Item Friday 13a - CD-0007-19 (Corps of Engineers, Los Angeles Co.)

Dear Ms. Barrera,

The California Department of Fish and Wildlife (Department) has reviewed the consistency determination (CD) submitted to the California Coastal Commission (Commission) by the U.S. Army Corps of Engineers (Corps) for the East San Pedro Bay Ecosystem Restoration Project (Project) in East San Pedro Bay, located offshore of Long Beach. The Department offers the following comments and recommendations regarding the Project. Additionally, the Department has attached our comments on the Project's Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) submitted to the Corps on January 27, 2020.

Artificial Reefs

It is the Department's understanding that the Corps plans to construct 24 rocky reefs using 132,000 tons of quarry stone, for a total of 122 acres of new artificial reef habitat in California state waters. The Department has authority for artificial reefs under a variety of roles including Trustee Agency Status under the California Environmental Quality Act, the Marine Life Protection Act, and the Marine Life Management Act.

A comprehensive statewide scientifically based plan for the placement of artificial reefs in state waters is needed before the Department can provide adequate consultation and advice to permitting agencies on reef design, development, and purpose. This plan would include necessary information on scientifically based appropriate locations and materials, habitat value exchange, invasive species issues, impacts to fish populations, and fisheries management issues associated with artificial reefs. Until this effort is completed, the Department cannot properly evaluate the issues above for this project, and unsystematic placement of artificial reefs within state waters could result in unforeseen significant impacts to marine habitats and resources. For this reason, the Department does not currently recommend any new artificial reef or artificial habitat regardless of intent. Additional background on the Department's role in artificial reefs and the historical habitat within East San Pedro Bay can be found in the Department's comment letter dated January 27, 2020.

Eelgrass Collection and Transplanting

It is the Department's understanding that the Corps also plans to create 30.3 acres of eelgrass beds using artificial nearshore rocky reefs, 100,000 cubic yards of dredged sand, and eelgrass transplants from a nearby existing donor bed. As stated in the Department's letter to the Corps on January 27, 2020, the Department is concerned about the placement of hard structure and sediment to create eelgrass habitat for this project. The Department instead recommends enhancing and expanding existing eelgrass habitat. The Department would like to remind the Corps and Commission that, in order to conduct the eelgrass transplanting portion of the Project, the Corps must first obtain a Scientific Collecting Permit (SCP) from the Department for the collection and transplanting of eelgrass. The SCP may include conditions such as donor bed surveys, limits on number and density of eelgrass turions collected, methods for collection and transplanting, notification of activities, and monitoring and reporting requirements. Please visit the Department's SCP webpage for more information and to access the SCP Portal: https://wildlife.ca.gov/Licensing/Scientific-Collecting.

Monitoring and Adaptive Management Plan

The Department asserts that the Corps' Monitoring and Adaptive Management Plan (MAMP) will be an essential part of this Project and that the MAMP should be reviewed by all state and federal resource agencies before being approved by the Commission. The Department recommends that monitoring protocols and performance criteria be robust and comprehensive for each habitat type. For example, should artificial reefs be pursued, maintaining a predetermined area of exposed rocky reef substrate does not reflect any ecological or biological standard for success and, alone, is not sufficient as performance criteria for that habitat. The Department recommends that biological success criteria be included for all habitat types. Additionally, the Department recommends that an invasive species performance standard, monitoring plan, and protocols be added to the MAMP for each habitat type.

Please refer to the Department's January 27, 2020 letter to the Corps (Attached) for further details on the Department's recommendations for the MAMP.

Conclusion

The Department appreciates the opportunity to provide comments to the Commission regarding the Corps' CD for the East San Pedro Bay Ecosystem Restoration Project. Please feel free to contact me with any questions or concerns.

Thank you,

Amanda Canepa
Environmental Scientist
California Department of Fish and Wildlife
Marine Region – Environmental Review and Water Quality
20 Lower Ragsdale Drive, Suite 100, Monterey, CA 93940
Amanda.Canepa@wildlife.ca.gov

CALIFORNIA DEPARTMENT OF FISH and WILDLIFE

**CD-0007-19 CORRESPONDENCE**

**From:** dave.booker@lbmboa.org <dave.booker@lbmboa.org>
**Sent:** Tuesday, December 1, 2020 4:06 PM
**To:** Energy@Coastal <EORFC@coastal.ca.gov>
**Cc:** LBMBOA Board <lbmboa.board@lbmboa.org>; tom mayes <tom.mayes@lbmboa.org>
**Subject:** Consistency Determination CD 0007 19 - Dec Agenda F13a

Consistency Determination: CD-0007-19 - December Agenda F13a

Summary:
We agree that East San Pedro Bay Ecosystem Restoration Project is generally consistent with the Commission Charter. Issues within the Boating community focus on the trade off of limiting safe recreational activities in favor of attempting to enhance Aquatic ecosystem.

We recommend that the Commission add to the agreement with the Corp of Engineers changes to the AMT (Adaptive Management Team)
Representatives of the current stakeholders. The City's Marine Advisory Committee can be the focal point.
USCG representatives responsible for the design of the new all weather channel through the proposed kelp fields at the entrance to Alamitos Bay. This is the biggest issue for LBMBOA.
US Naval representative sign off on eliminating the East Breakwater entrance for large vessels. (not frequently used currently)

Thank you.

Dave Booker
Environmental Director
Long Beach Marina Boat Owners Association

The previous Association comments from this summer, sent to EORFC follow:

Sent August 25.

Recommendation: Expand Area to be Enhanced, Engage Community Groups, Make an Example of what can be done.

Expand the harbor areas: The area studied by the Corp was limited to the area protected by the East Breakwater. The areas behind the middle breakwater, and the San Pedro Breakwater also provide for large areas for ecological enhancement.

Establish an Ecological Base line noting areas that thrive and areas.

Engage Community Groups: The local community groups, educational organizations, boating communities, aquariums, and fraternal groups are all likely to take interest and support these activities. City of Long Beach, Parks and Recreation and Marina Operations would most definitely need to be involved.

More input from Current users: The proposed locations of some of these enhancements jeopardizes current uses by kite boarders and boaters. These were not addressed as funding and time ran out.

For example, planting kelp fields at the Entrance to Alamitos Bay isn't fully thought out. Once planted, the kelp is going to migrate to where its not wanted. Proposed channel

markers through the kelp fields are going to add to ongoing costs for the Coast Guard. They are likely to move out of position with every storm and be subject to numerous collisions with recreational boaters. With each storm, some of the kelp will detach and float free. At every incoming tide, this free floating kelp will be flushed into Alamitos Bay and cause major issues for the homeowners, business, boat owners and the city.

The idea of improving the vitality of the ecosystem in this wonderful harbor is going to be widely supported. Its unfortunate the funding was spent on the wrong objective until almost all of it was spent.

Dave Booker
Environmental Director
Long Beach Marina Boat Owners Association

**CD-0007-19 CORRESPONDENCE**

**From:** Cleve Hardaker <chardaker@cox.net>
**Sent:** Tuesday, November 24, 2020 5:48 PM
**To:** Energy@Coastal <EORFC@coastal.ca.gov>
**Cc:** Jerry Desmond <Jerry@desmondlobbyfirm.com>; Todd Leutheuser <todd.leutheuser@gmail.com>; Winston Bumpus <sycwin@gmail.com>; Ray Durazo <ramondurazo@gmail.com>; Debrenia Madison-Smith <deviglobal@msn.com>; David Kennedy <dkennedy@boatus.com>; Rich Armstrong <rarmstrong@BOATUS.com>
**Subject:** Public Comment on December 2020 Agenda Item Friday 13a - CD-0007-19 (Corps of Engineers, Los Angeles Co.)

Dear California Coastal Commissioners,
Recreational Boaters Of California (RBOC) is the nonprofit advocacy organization that works to protect and enhance the interests of the state's recreational boaters before the legislative and executive branches of state and local government.
RBOC is in its 52nd year as a statewide organization promoting the enjoyment, protection, and responsible use of our waterways.
While RBOC supports the concept of the USACE East San Pedro Bay Habitat Enhancement some of its elements cause serious misgivings.
Specifically, the construction of kelp beds close to the Alamitos Bay entrance channel.
Kelp beds outside the Long Beach breakwater seem entirely appropriate and we envision minimal negative results from such construction.
Kelp beds constructed in the vicinity of the very busy Alamitos Bay entrance will present serious hazards to the many recreational boaters and fishermen coming and going at all times of the day.
Alamitos Bay is home to a large number of boats that come and go regularly.
However, many boaters and fishermen from all up and down the coast frequently enter the harbor and are likely to refer to Navigation Charts for guidance since they may not be familiar with those waters.
Current navigation Charts of Long Beach Harbor do not show any kelp beds in the area.
Navigation Charts always show kelp beds where they occur and identify them as a danger for mariners.
**'the potential exists for recreational boaters who traverse over kelp forests to get their propeller blades caught in the kelp at the ocean surface'**
The risk described here minimizes the degree of danger presented to boats under power.
Kelp consists of long, strong strands that can easily become wrapped in a boats propellor and can even cause engines to stall, rendering the boat disabled.
In extreme situations, thick kelp can become tightly wrapped around a propellor shaft and pull the shaft away from the transmission leaving a large hole in the hull to allow water ingress.

The proposal mentions that:
**'Kelp bed placement would be localized in clusters identifiable to boaters.**
**Pathways for boats to avoid kelp ... have been included in the design to ensure boaters have adequate open water space.'**
While it is possible that local mariners may become familiar with the location of kelp beds in the area of a harbor entrance and avoid them, visiting sailors and fishermen will have no way to know where these hazards are located.
Kelp forest is not static. It grows and spreads, often in unpredictable directions.
And even local boaters may be arriving or leaving the harbor in hours of darkness or in heavy fog that is not an uncommon occurrence. It would not be easy to identify kelp beds in such conditions.
Stormy weather that drives sailors to seek refuge in a safe harbor also make it impossible to identify kelp forests and the peril of a stalled engine while approaching a rocky breakwater is extreme.
RBOC, therefore, urges the Commission to review this proposal carefully and consider modifying it to minimize the potential danger presented by placing kelp forest in the vicinity of a busy recreational harbor approach.
To illustrate the significance of harbor approaches, I have copied the directions for mariners entering the harbor:
*The Alamitos Bay entrance is marked by two stone jetties which enter the bay in a NNE direction.*
*On the Western jetty Is a 25 foot, 6 second green flashing light, also with a foghorn.*
*The entrance is located approximately 030 degrees magnetic at 1.1 5 miles from the East end of the Long Beach Breakwater; and approximately 285 degrees magnetic at 1.1 miles from the Anaheim Bay (Huntington Harbor) channel entrance.*
*Take care when entering Alamitos Bay that you identify both stone jetties.*

*One to port and one to starboard. The San Gabriel River sits directly on the Southeast side of the Eastern jetty. It becomes extremely shallow quickly, and its bottom is dotted with wrecks and rocky shoals. Therefore, enter Alamitos Bay only when you can identify jetties within 100 yards on both sides of your boat.*
*The Alamitos Bay Channel is marked with a series of centerline buoys.*
*Stay to starboard of this row when traveling in either direction.*
*Also be aware that a silt pumping barge sometimes sits in the channel to clear out shoal areas. It is well marked with round yellow cans.*
*Stay more then 20 feet from these cans, as they are usually attached to The dredging hose hanging below the surface.*
*The speed limit throughout Alamitos Bay , including the entrance channel, is 5 m.p.h., strictly enforced by the Long Beach Marine Bureau patrol boats.*
Cleve Hardaker
President RBOC

**CD-0007-19 CORRESPONDENCE**

**From:** Dave Hall <bittermelondave@gmail.com>
**Sent:** Monday, November 23, 2020 3:51 AM
**To:** Energy@Coastal <EORFC@coastal.ca.gov>
**Subject:** a. CD-0007-19(Corp of Engineers, Los Angeles County) East San Pedro Bay Restoration

Dear Chair and Commissioners:

I wish to support efforts to restore the heavily polluted East San Pedro Bay in Los Angeles County. In particular, I support the kelp forest proposal as well as the man made island for California Least Tern nesting habitat. Both proposed actions will go far in protecting water used for feeding birds, establish feeding areas for fish in the Bay and provide nesting opportunities for our coastal endangered and threatened species such as the California Least Tern.

Please support these needed efforts to enhance and protect the East San Pedro Bay.

Respectfully,
DAVE HALL
1047 Chestnut Avenue
Long Beach, California 90813-2921

**CD-0007-19 CORRESPONDENCE**

**From:** Bryant Chesney - NOAA Federal <bryant.chesney@noaa.gov>
**Sent:** Friday, August 28, 2020 3:39 PM
**To:** Barrera, Alexis@Coastal <Alexis.Barrera@coastal.ca.gov>
**Subject:** Re: CD-0007-19 Has Been Postponed

Hi Alexis,
Thank you for the notification. I did review the staff report and just want to note that there was not agency agreement on adequately addressing our EFH concerns (see attached for their response to us, specifically conservation recommendation #2). We opted not to pursue formal elevation given the contextual purpose, and the overall uncertainty of project implementation, but their scientific rationale for rejecting our recommendation on invasive/non-native species monitoring is not well justified. Depending upon our bandwidth, we may provide comments in response to the FEIS on this issue, and the apparent lack of compliance with the National Artificial Reef Plan. All that being said, I am hopeful that the Corps will reconsider their monitoring approach if this project is ultimately authorized by Congress.
If you would like additional detail on the monitoring issue, please let me know.
Hope you have a good weekend,
Bryant

On Fri, Aug 28, 2020 at 11:00 AM Barrera, Alexis@Coastal <Alexis.Barrera@coastal.ca.gov> wrote:
This item, CD-0007-19, has been postponed and will not be on the agenda for the California Coastal Commission's September Hearing.

--
**Bryant Chesney**
*Senior Marine Habitat Resource Specialist, West Coast Region*
*Protected Resources Division, Long Beach, California*
NOAA Fisheries | U.S. Department of Commerce
Office: (562) 980-4037
www.westcoast.fisheries.noaa.gov

**DEPARTMENT OF THE ARMY**
**U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT**
**915 WILSHIRE BOULEVARD, SUITE 930**
**LOS ANGELES, CALIFORNIA 90017-3489**

June 19, 2020

Mr. Chris Yates
Assistant Regional Administrator for Protected Resources
National Oceanic and Atmospheric Administration
National Marine Fisheries Service, West Coast Region
501 West Ocean Boulevard, Suite 4200
Attention: Mr. Bryant Chesney
Long Beach, California 90802-4213

Dear Mr. Yates:

On May 1, 2020, the U.S. Army Corps of Engineers, Los Angeles District (Corps) received a National Marine Fisheries Service's (NMFS) Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) Essential Fish Habitat response for the East San Pedro Bay Ecosystem Restoration Feasibility Study, Los Angeles County, California (National Marine Fisheries Service reference no. 151422WCRO202000072, dated May 1, 2020), and a discussion was held with NMFS staff on May 26, 2020 to discuss the recommendations.

This letter provides the Corps' response to the conservation recommendations contained in the above referenced document in accordance with section 305(b)(4)(B) of the MSFCMA.

As part of the proposed action, the Corps would be implementing environmental commitments to avoid and minimize impacts to Essential Fish Habitat. Your office has reviewed the project and provided three (3) conservation recommendations to avoid, minimize, mitigate, or otherwise offset the adverse effects of the proposed action on Essential Fish Habitat, as well as an analysis for how the conservation recommendations were determined.

In the attached Enclosure, the Corps has provided a response to each Essential Fish Habitat conservation recommendation provided by NMFS. The Corps believes that it has met the intent of the law, and considers this consultation with your office pursuant to the MSFCMA complete. We appreciate the time and careful consideration of NMFS staff in evaluating the proposed project and for providing Essential Fish Habitat conservation recommendations. We look forward to a continued productive partnership with NMFS in ensuring the restoration of marine aquatic habitat in southern California.

Should you have any questions about our response, please contact Dr. Chris L. Chabot, Project Biologist, at (213) 452-3861 or via email at christopher.l.chabot@usace.army.mil.

Sincerely,

Eduardo T. De Mesa
Chief, Planning Division

Enclosure

**ENCLOSURE: USACE Response to National Marine Fisheries Service's (NMFS) Essential Fish Habitat (EFH) Conservation Recommendations for East San Pedro Bay Ecosystem Restoration Feasibility Study**

**NMFS EFH Conservation Recommendation 1.**

In addition to avoiding vegetated eelgrass habitat observed in the planned pre-construction survey, the USACE should avoid nearshore reef and sediment placement in areas previously mapped as eelgrass habitat (Merkel and Associates, 2014). By email dated May 26, 2020, the NMFS noted that this conservation recommendation incorrectly cited the Merkel and Associates, 2014 eelgrass report, and should have cited to Merkel and Associates, Inc. 2017. 2016 Southern California Bight Regional Eelgrass Surveys. Report prepared for National Marine Fisheries Service.

**USACE Response to EFH Conservation Recommendation 1.**

Based on data obtained from the planned pre-construction survey, areas mapped as previously having eelgrass by Merkel and Associates in 2016, and the suitable areas for nearshore reef placement indicated in Figure 5-2 of the IFR/EIS/EIR, the USACE has determined that it is reasonably practicable to shift the locations of nearshore reef and sediment placement during the pre-construction engineering and design (PED) phase for the East San Pedro Ecosystem Restoration Project to avoid areas known to have previously supported eelgrass as indicated by the 2016 survey by Merkel and Associates, in addition to areas with existing eelgrass. The Final IFR/EIS/EIR will include this environmental commitment.

**NMFS EFH Conservation Recommendation 2.**

The USACE should incorporate non-native species abundance and distribution as a performance measure in the monitoring and adaptive management program. Specifically, the USACE should include monitoring of non-native and/or invasive algae (*e.g.*, *Caulerpa taxifolia*, *Sargassum horneri*, *S. muticum*, *Undaria pinnatifida*), and non-native sessile invertebrates, such as conspicuous space-occupying, bryozoans (*e.g.*, *Bugula neritina*, *Watersipora subtorquata*, *Zoobotryon verticillatum*), mussels (*Arcuatula senhousia*, *Mytilus galloprovincialis*), Pacific oyster (*Crassostrea gigas*), and tunicates (*e.g.*, *Botrylloides* spp., *Ciona* spp., *Diplosoma listerianum*, *Microcosmus squamiger*, *Styela* spp.).

**USACE Response to EFH Conservation Recommendation 2.**

The USACE disagrees with the recommendation to establish non-native species abundance and distribution as a performance measure in the Monitoring and Adaptive Management Plan (MAMP) for the East San Pedro Ecosystem Restoration Project; however, the USACE will use monitoring data in support of identifying appropriate actions if performance measures are not met or for selecting adaptive management actions. As written, performance measures described within the MAMP of the draft IFR/EIS/EIR are consistent with or similar to currently published performance measures for restored marine ecosystem projects (*e.g.*, NMFS, 2014 and Reed *et al.*, 2006 & 2017). As such, the USACE considers these performance measures satisfactory to evaluate project performance and to determine whether adaptive management measures are needed. Within the Draft IFR/EIS/EIR, language was provided on page 2-7 of the MAMP pertaining to monitoring of non-native and/or invasive (*e.g.*, nuisance) species abundance and distribution to inform decisions about whether the restoration is performing as intended (*e.g.*, native cover measure) and, if not, what adaptive management measures (as briefly described on pages 3-2 and 3-3 for each of the restored habitats) can be taken to rectify the issue. However, predicted nuisance species currently existing within the project area and the Southern California Bight were not identified for each of the restored habitats. In regard to

the non-native and/or invasive (*i.e*., nuisance) species NMFS specifically identifies for monitoring, the USACE agrees to amend the monitoring outlined in the MAMP to specifically include monitoring of non-native/invasive species of algae (*e.g.*, *Caulerpa taxifolia*, *Sargassum horneri*, etc.) and sessile invertebrates including bryozoans (*e.g.*, *Bugula neritina*), mussels (*e.g.*, *Arcuatula senhousia*), Pacific oyster (*Crassostrea gigas*), and tunicates (*e.g.*, *Botrylloides* spp., *Ciona* spp., etc.). The USACE will commit to incorporating additional language detailing the monitoring and adaptive management of such species into the MAMP in the final IFR/EIS/EIR.

**NMFS EFH Conservation Recommendation 3.**

The USACE should evaluate the feasibility of beneficially re-using suitable dredged material for ecosystem restoration purposes within East San Pedro Bay. Specifically, the USACE should evaluate the feasibility of utilizing dredged material from the USACE's POLB Deep Draft Navigation Project to support restoration measures identified in the TSP.

**USACE Response to EFH Conservation Recommendation 3.**

The USACE (and the Local Sponsor, the City of Long Beach) are committed to beneficially reusing dredge material to the maximum extent practicable. While we currently project using the Surfside Sunset borrow site, the possibility of utilizing dredged material from the Port of Long Beach Deep Draft Navigation Project will be evaluated during PED and a decision made based on sediment quality and the timing of construction for both projects. No specific projects have been identified that match construction timing and results from sediment analyses are necessary and will be conducted during PED. If beneficial use sites become available, the Corps would consider a supplemental analysis.

**Literature Cited:**

**National Marine Fisheries Service (NMFS). (2014). California Eelgrass Mitigation Policy and Implementing Guidelines. NOAA Fisheries, West Coast Region. 48pp**

Reed, D. C., Schroeter, S. C., and Huang, D. (2006). An experimental investigation of the use of artificial reefs to mitigate the loss of giant kelp forest habitat. San Diego, CA: University of California.

Reed, D. C., Schroeter, S. C., and Page, M. (2017). Annual Report of the Status of Condition C: Kelp Reef Mitigation. San Diego, CA: University of California.

**CD-0007-19 CORRESPONDENCE**

**From:** Cleve Hardaker <chardaker@cox.net>
**Sent:** Wednesday, August 26, 2020 11:40 PM
**To:** Energy@Coastal <EORFC@coastal.ca.gov>
**Subject:** Public Comment on September 2020 Agenda Item Friday 16a - CD-0007-19 (Corps of Engineers, Los Angeles Co.)

Dear California Coastal Commissioners,

Recreational Boaters Of California (RBOC) is the nonprofit advocacy organization that works to protect and enhance the interests of the state's recreational boaters before the legislative and executive branches of state and local government.
RBOC is in its 52nd year as a statewide organization promoting the enjoyment, protection, and responsible use of our waterways.

While RBOC supports the concept of the USACE East San Pedro Bay Habitat Enhancement some of its elements cause serious misgivings.
Specifically, the construction of kelp beds close to the Alamitos Bay entrance channel.
Kelp beds outside the Long Beach breakwater seem entirely appropriate and we envision minimal negative results from such construction.

Kelp beds constructed in the vicinity of the very busy Alamitos Bay entrance will present serious hazards to the many recreational boaters and fishermen coming and going at all times of the day.
Alamitos Bay is home to a large number of boats that come and go regularly.
However, many boaters and fishermen from all up and down the coast frequently enter the harbor and are likely to refer to Navigation Charts for guidance since they may not be familiar with those waters.
Current navigation Charts of Long Beach Harbor do not show any kelp beds in the area.

Navigation Charts always show kelp beds where they occur and identify them as a danger for mariners.
**'the potential exists for recreational boaters who traverse over kelp forests to get their propeller blades caught in the kelp at the ocean surface'**

The risk described here minimizes the degree of danger presented to boats under power.
Kelp consists of long, strong strands that can easily become wrapped in a boats propellor and can even cause engines to stall, rendering the boat disabled.
In extreme situations, thick kelp can become tightly wrapped around a propellor shaft and pull the shaft away from the transmission leaving a large hole in the hull to allow water ingress.

The proposal mentions that:
**'Kelp bed placement would be localized in clusters identifiable to boaters.**
**Pathways for boats to avoid kelp ...**
**have been included in the design to ensure boaters have adequate open water space.'**

While it is possible that local mariners may become familiar with the location of kelp beds in the area of a harbor entrance and avoid them, visiting sailors and fishermen will have no way to know where these hazards are located.
Kelp forest is not static. It grows and spreads, often in unpredictable directions.
And even local boaters may be arriving or leaving the harbor in hours of darkness or in heavy fog that is not an uncommon occurrence. It would not be easy to identify kelp beds in such conditions.
Stormy weather that drives sailors to seek refuge in a safe harbor also make it impossible to identify kelp forests and the peril of a stalled engine while approaching a rocky breakwater is extreme.

RBOC, therefore, urges the Commission to review this proposal carefully and consider modifying it to minimize the potential danger presented by placing kelp forest in the vicinity of a busy recreational harbor approach.

To illustrate the significance of harbor approaches, I have copied the directions for mariners entering the harbor:

*The Alamitos Bay entrance is marked by two stone jetties which enter the bay in a NNE direction.*
*On the Western jetty Is a 25 foot, 6 second green flashing light, also with a foghorn.*
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*Therefore, enter Alamitos Bay only when you can identify jetties within 100 yards on both sides of your boat.*

*The Alamitos Bay Channel is marked with a series of centerline buoys.*
*Stay to starboard of this row when traveling in either direction.*
*Also be aware that a silt pumping barge sometimes sits in the channel to clear out shoal areas. It is well marked with round yellow cans.*
*Stay more then 20 feet from these cans, as they are usually attached to The dredging hose hanging below the surface.*

*The speed limit throughout Alamitos Bay , including the entrance channel, is 5 m.p.h., strictly enforced by the Long Beach Marine Bureau patrol boats.*

Cleve Hardaker
President RBOC

**CD-0007-19 CORRESPONDENCE**

**From:** Dave Booker <Dave.Booker@lbmboa.org>
**Sent:** Tuesday, August 25, 2020 8:52 PM
**To:** Energy@Coastal <EORFC@coastal.ca.gov>
**Subject:** Public Comment on September 2020 Agenda Item Friday 16a - CD-0007-19 (Corps of Engineers, Los Angeles Co.)

Recommendation: Expand Area to be Enhanced, Engage Community Groups, Make an Example of what can be done.

Expand the harbor areas: The area studied by the Corp was limited to the area protected by the East Breakwater. The areas behind the middle breakwater, and the San Pedro Breakwater also provide for large areas for ecological enhancement.

Establish an Ecological Base line noting areas that thrive and areas.

Engage Community Groups: The local community groups, educational organizations, boating communities, aquariums, and fraternal groups are all likely to take interest and support these activities. City of Long Beach, Parks and Recreation and Marina Operations would most definitely need to be involved.

More input from Current users: The proposed locations of some of these enhancements jeopardizes current uses by kite boarders and boaters. These were not addressed as funding and time ran out.

For example, planting kelp fields at the Entrance to Alamitos Bay isn't fully thought out. Once planted, the kelp is going to migrate to where its not wanted. Proposed channel markers through the kelp fields are going to add to ongoing costs for the Coast Guard. They are likely to move out of position with every storm and be subject to numerous collisions with recreational boaters. With each storm, some of the kelp will detach and float free. At every incoming tide, this free floating kelp will be flushed into Alamitos Bay and cause major issues for the homeowners, business, boat owners and the city.

The idea of improving the vitality of the ecosystem in this wonderful harbor is going to be widely supported. Its unfortunate the funding was spent on the wrong objective until almost all of it was spent.

Dave Booker
Environmental Director
Long Beach Marina Boat Owners Association

**CD-0007-19 CORRESPONDENCE**

**From:** Edward Stetson <ed.griffin@yahoo.com>
**Sent:** Tuesday, August 25, 2020 3:42 PM
**To:** Energy@Coastal <EORFC@coastal.ca.gov>
**Subject:** Public Comment on September 2020 Agenda Item Friday 16a - CD-0007-19 (Corps of Engineers, Los Angeles Co.)

I urge that the well-intentioned proposal to place new kelp beds and other features in East San Pedro Bay be revised to protect the continued ability of boaters to safely navigate this popular area.

Sent from Mail for Windows 10

**CD-0007-19 CORRESPONDENCE**

**From:** Cleve Hardaker <chardaker@cox.net>
**Sent:** Saturday, August 22, 2020 9:47 PM
**To:** Energy@Coastal <EORFC@coastal.ca.gov>
**Subject:** Public Comment on September 2020 Agenda Item Friday 16a - CD-0007-19 (Corps of Engineers, Los Angeles Co.)

IF ENACTED AS PROPOSED, the entrance to Alamitos Bay would be significantly altered.

It is illogical to suggest that the kelp will not spread and render the approaches to the entrance very hazardous. Boat propellors will become wrapped in kelp so boat engines will stall.

The risk is that there will be many boats disabled in that location requiring assistance that will itself be hazardous.

This proposal is ill thought out.

Cleve Hardaker
(714) 305-6513