

CALIFORNIA COASTAL COMMISSION

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F16a

ADDENDUM

DATE: March 10, 2022

TO: Coastal Commissioners and Interested Parties

FROM: South Coast District Staff

SUBJECT: **ADDENDUM TO ITEM F16a, CDP NO. 5-21-0549 FOR THE COMMISSION MEETING ON FRIDAY, MARCH 11, 2022.**

This addendum is designed to achieve the following objectives. First, in Section I, Commission staff updates the record by supplementing it with correspondence that was received after publication of the staff report. Section II provides responses to issues raised in the recent correspondence, and Commission staff proposes the Commission incorporate these responses into its findings. Finally, Section III provides corrections and modifications to the staff report in light of an additional tribal consultation conducted on March 4, 2022.

I. CORRESPONDENCE RECEIVED

Documents received after publication of the staff report dated March 1, 2022 include:

- (1) A letter (via email) in opposition from Chief Anthony Morales (Gabrielino/Tongva San Gabriel Band of Mission Indians), Rebecca Morales, Cheyenne Phoenix, Patricia Martz, Virginia Bickford, Ann Cantrell, and Anna Christensen dated March 3, 2022.
- (2) A letter in support from Christina Conley (Gabrielino Tongva Indians of California) dated March 3, 2022.
- (3) A letter in support from Amy Hutzler (California State Coastal Conservancy) dated March 3, 2022.
- (4) A letter in support from Taylor Andrew Parker dated March 3, 2022.
- (5) A letter in support from Gabrielle Crowe (Gabrielino-Shoshone Tribal Council of Southern California) dated March 4, 2022.
- (6) A letter in support from Linda Candelaria, Jerry Maldonado, Vincent Holguin, Charles Alvarez, and Jane Hussey (Gabrielino-Tongva Tribe) dated March 6, 2022.
- (7) A letter in support from Elizabeth Lambe (Los Cerritos Wetlands Land Trust) dated March 7, 2022.

(8) A letter in support from Mark Stanley (San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy) dated March 7, 2022.

The Commission had also received additional correspondence prior to publication of the staff report dated March 1, 2022. These are included on pages 2 – 17 of the correspondence available on the Commission’s website at the following address: <https://documents.coastal.ca.gov/reports/2022/3/F16a/F16a-3-2022-correspondence.pdf>.

II. RESPONSE TO COMMENTS

The staff report dated March 1, 2022, included some inaccuracies that were identified in the correspondence received. Commission staff would like to correct the record and incorporate additional findings into the staff report to correctly portray the details of the February 24, 2022 consultation, including the names of the attendees, the content and substance of the discussion, and characterization of the issues raised in regards to tribal cultural resource impacts. The report also includes new discussion of the March 4, 2022, consultation, as well as additional detail of previous consultations that the applicant had conducted prior to the submittal of the subject CDP application. Other changes to the staff report reflect the support expressed by several, but not all, of the consulted Tribal groups in the correspondence received by the Commission.

Additional clarification has been provided regarding the ability of tribal members to access the project site upon request and plans by the applicant to further expand access to the site by the general public and tribal members in the future. The correspondence also raised questions regarding the biological resource protection conditions, described in more detail in the following Response to Comments section. In response to those comments and comments made in consultations following publication of the staff report, the Wetlands and Environmentally Sensitive Habitat Area section of the report includes additional findings relating to the significance of biological resources and the native wildlife of the Los Cerritos Wetlands complex to the area’s tribes and retains the requirement of **Special Condition 6** to share the results of the investigation with the affected tribes.

Thus, the following is added as a **Response to Comments** section to the staff report dated March 1, 2022 (as section **G** on staff report page 32, thus renumbering the CEQA section as section **H**):

The Commission has received seven (7) letters in support of the proposed project, and one letter in opposition from Chief Anthony Morales of the Gabrieleno/Tongva San Gabriel Band of Mission Indians, Rebecca Robles (Acjachemen Culture Keeper), Cheyenne Phoenix, Patricia Martz, Virginia Bickford, Ann Cantrell, and Anna Christensen dated March 3, 2022 and received via email on March 2, 2022. The letters in opposition raised the following issues: (1) that the proposed project would result in “anticipatory destruction” of the tribal cultural resources and landscape of the Los Cerritos Wetlands complex; (2) that the proposed project will lead to additional ground disturbance in the future as part of the larger restoration effort; (3) that tribal cultural resources go beyond archaeological resources and recovered items and also encompass significant tribal cultural spaces, objects, and lands; (4) that the staff report contained factual inconsistencies regarding the February 24, 2022 consultation; and (5) that the proposed project, as conditioned, will still have adverse impacts on wildlife at the site, particularly nesting birds.

In correspondence received on February 25 and 26, 2022, Ann Cantrell and Anna Christensen of the Los Cerritos Wetlands Task Force further discuss the impacts to biological resources and environmentally sensitive habitat area at the site as a result of the proposed project. One of the issues raised is the need for 3:1 mitigation for impacts to environmentally sensitive habitat area (ESHA). The Los Cerritos Wetlands complex, and more specifically, the south LCWA site, contains areas that would be considered ESHA per Coastal Act Sections 30107.5 and 30240. The south LCWA site also contains numerous jurisdictionally delineated wetlands, areas with sensitive species, but also ruderal and unvegetated areas. The applicant proposes to prioritize locations that are degraded and/or unvegetated. Since the applicant is proposing to conduct an investigation related to the purpose of restoration, an allowable use per Coastal Act Sections 30233 and 30240, if there are further unanticipated impacts to ESHA beyond the immediate area of the 18 boreholes, then the applicant will be required to mitigate at a ratio of 3:1. The Commission also notes that restoration-related development is allowed within the deed restricted 9.2-acre open space area on the site for future raptor foraging/nesting habitat per conditions of approval of CDP 5-97-367. **Special Condition 1** includes specific protections for that area.

Requests were made in recent correspondence and meetings to require the project be conducted outside of nesting season. Given funding constraints, the applicant's desire to move forward with the larger restoration effort, and the minimization of impacts to nesting birds, as conditioned, the applicant suggested that delaying the investigation until after the bird nesting season (September 30) is not feasible or necessary. **Special Condition 4** requires the applicant to first conduct a bird survey, determine adequate buffers, and halt ground disturbance whenever a bird nesting effort is occurring. As conditioned, the project will be consistent with the biological resource and wetlands protection policies of the Coastal Act. As for the larger future restoration effort, the Commission reiterates that the final design is not yet complete and will be informed by the proposed preliminary investigation. As for the construction of berms, bridges, culverts, and tidal channels in the future, as currently detailed in the draft conceptual plans for the larger restoration, any future development on the site will be subject to Coastal Act permit requirements. The Commission is aware that, while not considered under the subject proposal, the Cogstone report prepared by the applicant has deficiencies and raises substantial tribal concerns that must be addressed as the applicant advances in the permitting process for any future projects.

For the purposes of this subject application, the future restoration effort only serves as context and to elucidate the need for the initial geotechnical study. It does not bear weight on the Commission's analysis of Chapter 3 policies; in other words, the Commission will review any proposal for restoration of the site once it is submitted as a coastal development permit application in the future.

III. REVISIONS TO THE STAFF REPORT

The following modifications and corrections are made to the staff report dated March 1, 2022. Language to be added is shown in underlined text, and language to be deleted is identified by ~~strikethrough~~.

- a) Modify the first paragraph of Tribal Consultation on page 17 as follows:

Ahead of filing for a coastal development permit application, the applicant had ~~already previously~~ formed a Tribal Advisory Group (TAG) to fulfill AB 52 and CEQA tribal consultation requirements (**Exhibit 4**). Funding was obtained to compensate participants in the Tribal Advisory Group for their time and expertise provided, and since establishment of the TAG, there have been at least three formal meetings, including one in-person site visit on July 23, 2021 (Commission staff were also present at this site visit). There are currently six Tribes that have committed to participation in the TAG. In addition to consultation outreach by letter or phone and formal meetings, the Los Cerritos Wetlands Authority had also internally shared a preliminary draft of the Traditional Cultural Resource Assessment (not available for public review) with some affected Native American groups for additional feedback regarding detailed cultural resource treatment and mitigation procedures. While ~~Not~~ all Tribes with known ancestral ties to the area were ~~consulted with~~ contacted by the applicant, some, including the Gabrieleno Band of Mission Indians - Kizh Nation and Gabrieleno Tongva San Gabriel Band of Mission Indians, did not participate in all TAG meetings. The LCWA continues to reach out to tribes it has not yet consulted with, as well as schedule meetings with interested Tribes.

- b) Modify the last incomplete paragraph of Tribal Consultation on page 17 as follows:

This project was originally scheduled to be heard at the February 9-11, 2022 Commission meeting. However, after correspondence from the Chair of the Gabrieleno/Tongva San Gabriel Band of Mission Indians (Chief Anthony Morales) and Acjachemen Culture Keeper (Rebecca Robles) on February 4, 2022, Commission staff removed this item from the calendar in order to have sufficient time to conduct additional consultation, review the proposed Special Conditions, and re-evaluate the staff recommendation. Since the item was postponed, staff met with Chief Morales and Rebecca Robles via video conference on February 15, have discussed this project with Chief Morales via phone call on multiple occasions, and on February 24, 2022, Commission staff met with Chief Morales and other interested parties, including representatives of ~~and~~ the Los Cerritos Wetlands Task Force and California Cultural Resources Preservation Alliance, to discuss the project and the cumulative impact implications it may have on tribal cultural resources and biological resources at the site. In addition, on March 4, 2022, Commission staff facilitated a discussion between the applicant (represented by LCWA staff and Coastal Conservancy staff) and Chief Anthony Morales, Adrian Morales, Rebecca Robles, and members of the Los Cerritos Wetlands Task Force and the California Cultural Resources Preservation Alliance.

- c) Modify the first complete paragraph of Tribal Concerns on page 18 as follows:

The concerns described during ~~the first series of~~ consultations with Chairman Andy Salas of the Gabrieleno Band of Mission Indians - Kizh Nation, Chairman Anthony Morales of the Gabrieleno Tongva San Gabriel Band of Mission Indians, and Chairman Robert Dorame Gabrielino Tongva Indians of California Tribal Council were, generally, that this site is Sacred Land with high potential for tribal cultural resources, and that any development here should be reviewed, considered, and monitored very carefully. Tribal representatives also described the harm done to their communities through past and continued coastal development, including disturbances at this site and of sites in the immediate project vicinity. The tribal representatives provided Commission staff with suggestions on how to minimize

impacts to tribal cultural resources, including by avoiding boreholes in sensitive areas and having Native American monitors spot-check the soil samples during the excavation process. Tribal representatives also discussed the possibility that the applicant grant additional tribal access to the south LCWA site as part of the scope of this project, mainly for ceremonial and funerary purposes once the site has been restored. In response, Commission staff included Special Conditions 1 and 2 to document, monitor, and appropriately treat all known and found tribal cultural resources onsite and avoid impacting those resources. The applicant has also been notified of such requests and will continue to coordinate with all affected Tribes on the implementation of additional tribal access measures through the larger restoration effort.

d) Modify the last paragraph of Tribal Concerns on page 19 as follows:

The Commission understands the impacts of disturbance of the site, including if the restoration project does not move forward. However, the Commission also understands the need for the currently proposed project to inform the design and scope of future wetlands restoration efforts at this site, which has already gone through multiple planning and environmental review processes. There is no other least environmentally damaging alternative to the geotechnical borings in the lowlands, if that area is to be successfully restored and open for public access and recreation in the future. Commission staff has discussed the recommendations with Chief Morales, ~~who Rebecca Robles, and the Los Cerritos Wetlands Task Force on February 24, 2022, and all parties have come to an understanding that portions of the subject project may be necessary to carry out the investigative phase of a larger restoration effort at this site. The Commission recommends, and the consulted Tribes concur, that a new Tribal Cultural Resources Mitigation and Treatment Plan must be required to adequately address all remaining tribal concerns. The consulted Tribes have clarified that tribal cultural resources may be found throughout the entirety of the Los Cerritos Wetlands complex and also expressed interest in~~ emphasized the importance of continuing discussions and consultations with Commission staff, as well as the applicant, in preparation and anticipation of that the larger restoration effort of the site may be undertaken in the future. Thus, on March 4, 2022, Commission staff met with Chief Anthony Morales, Adrian Morales, Rebecca Robles, the Los Cerritos Wetlands Task Force, and members of the California Cultural Resources Preservation Alliance, and LCWA staff to conduct one additional consultation before this application's scheduled hearing. During discussions, Chief Morales and other Tribal voices reiterated that a no-project alternative is the least impactful alternative to tribal cultural resources, including biological resources at the site, and that any future restoration at the site should not involve significant ground disturbance. The applicant was asked to postpone or withdraw the subject application, and Commission staff were encouraged to recommend denial of the project. Before the conclusion of the meeting, LCWA staff made plans to set up additional formal consultations with Chief Morales and assured the participants they would continue engaging and consulting with the Tribes about any future endeavor at the site.

Coastal Act Section 30244 states that where development would adversely impact archaeological or paleontological resources, reasonable mitigation measures shall be required. While not all of the concerns described above are addressed in the subject Special Conditions (as the no-project alternative is not being

recommended), the Commission finds that the Cultural Resources Mitigation and Treatment Plan required by **Special Condition 2** addresses some of the tribal concerns relating to ground disturbance and treatment of discovered tribal cultural resources to the maximum extent possible and conforms with Coastal Act Section 30244. This Special Condition thus specifically minimizes impacts to archaeological resources or recovered items. However, tribal cultural resources are not only archaeological resources, but also include significant tribal cultural spaces, objects, and sacred lands; as described in the following sections, **Special Conditions 4 and 5** also address some of the other concerns raised by Tribal representatives related to the preservation of the landscape, whereby all adverse impacts to wetlands and ESHA will be adequately mitigated, and biological productivity will be evaluated and maintained.

- e) Incorporate findings from the Environmental Justice section into the Archaeological and Tribal Cultural Resources section on page 20 of the staff report (after the Tribal Concerns subsection and before the Tribal Cultural Resources Monitoring and Treatment subsection), delete the separate Environmental Justice section, and renumber the following sections as: C. Public Access, D. Wetlands and Environmentally Sensitive Habitat Area, E. Marine Resources and Water Quality, and F. Local Coastal Program.

On page 20, modify as follows:

Environmental Justice

Throughout California's history, low-income communities, communities of color, California Native American Tribes, and other historically marginalized populations have faced disproportionate burdens in accessing the California coastline due to geographic, economic, social, and cultural barriers. Several Tribes have suffered direct loss of access to ancestral lands along the California Coast. ~~This project site has specific environmental justice concerns related to coastal access for Californian Native American Tribes with ancestral ties to the project location.~~

~~Ensuring maximum and equitable public access to the California coastline (as required by Coastal Act Section 30210 and 30213) is consistent with environmental justice principles reflected in the Coastal Act. Section 30604(h) of the Coastal Act states: "when acting on a coastal development permit, the issuing agency, or the commission on appeal, may consider environmental justice, or the equitable distribution of environmental benefits throughout the state." The Commission adopted an environmental justice policy in March 2019, committing to consider environmental justice principles, consistent with Coastal Act policies, in the agency's decision-making process and ensuring coastal protection benefits are accessible to everyone, especially communities that have been historically marginalized, harmed by, or excluded from coastal development. In approving the policy, the Commission recognized that equitable coastal access is encompassed in, and protected by, the public access policies of Chapter 3 of the Coastal Act. The Commission also recognizes the injustices that have been experienced by California Native American Tribes and committed to the following in its EJ Policy:~~

As stated in the Commission's Environmental Justice Policy, the Commission respectfully acknowledges the painful history of genocide against Native

American Tribes and honors the efforts of California's coastal tribes to rebuild thriving, living cultures based on traditional knowledge, languages, and practices. The Commission commits to regular and meaningful partnership to ensure that tribes are valued and respected contributors to the management of California's coast. In addition to the requirements of the Commission's formal Tribal Notification and Consultation Policy, the Commission will work collaboratively with tribes to better understand the significance of local and regional cultural concerns.³ This includes the application of traditional ecological knowledge, as well as access to and protection of areas of cultural significance, ethnobotanical resources, traditional fishing and gathering areas, and sacred sites.

The consultation and consideration of tribal concerns described above is one element of meaningful engagement with Tribes; however, in this case, the Commission must can also consider environmental justice within the lens of Chapter 3 access policies, including Section 30244 and 30240, which require that impacts to archaeological resources be minimized and maximize public access be maximized for all people, respectively including groups that have been disproportionately burdened by previous environmental harms, like the coastal Tribes in this area. In consultations with Commission staff on the subject project, as mentioned above, Tribal representatives described the harm done to their communities through past and continued coastal development, including disturbances at this site and of sites in the immediate project vicinity. For at least the last century, there has been limited to no coastal access for Californian Native American Tribes with ancestral ties to the project location. However, since the property was acquired by the LCWA in 2010, the applicant has offered access to and use of the site for religious, ceremonial purposes and resource and material gathering, upon request. In addition, the applicant intends to formally expand tribal access to other areas upon request or completion of the related restoration project. Therefore, while no Tribe owns this site currently, Tribes are allowed to access and use the area, which will likely continue into the future.

With regards to archaeological and tribal cultural resources, Tribal representatives have explained that known tribal cultural resources go beyond the extent of sites mapped and recorded by archaeologists or objects recovered from sites. The subject area, including the land, wildlife, and connection of tribal people thereto is sacred, and non-tribal definitions of tribal cultural resources may not reflect or incorporate tribal knowledge. Chief Anthony Morales, Adrian Morales, and Rebecca Robles suggested that in disregarding the Tribes' input and insights during the consultation process, there is risk of further excluding the tribal community from the decision-making process and exacerbating issues of marginalization, exploitation, and eventual erasure of tribal people, memory, and narrative.

With regards to archaeological and tribal cultural resources, **Special Conditions 1 and 2** have been imposed to ensure that the final revised plans of this investigative project minimize and mitigate for adverse impacts to tribal cultural resources, and would additionally protect tribal resources that are not confined to the boundaries of archaeological sites and may instead be encompassed in cultural landscapes that

³ <https://documents.coastal.ca.gov/assets/env-justice/tribal-consultation/Adopted-Tribal-Consultation-Policy.pdf>

are significant to Native American tribal groups because of prehistoric habitation or use for current cultural practices. Even with these conditions imposed, some Tribal representatives continue to feel that the disturbance of the site that would result from approval of this project would continue the harm caused by prior coastal development in this area. Given that the site was previously used for private, industrial purposes that excluded tribal participation and enjoyment of the land, not to mention the disproportionate adverse impacts such land uses had on tribal cultural resources and tribal communities, Tribes remain concerned that future restoration efforts, facilitated by this initial investigative study, will not equitably benefit Tribes or address the injustices incurred and required in order for the project to be developed as currently planned. However, as described in greater detail in the next section, With regard to public access, the applicant (Los Cerritos Wetlands Authority) has offered to provide all affected Native American Tribes direct access to and use of the sacred site for religious, ceremonial purposes, resource and material gathering, and intends to expand tribal access to other areas upon request or completion of the restoration project. Thus, the Commission finds that the project, as conditioned, minimizes impacts and proposal is consistent with the Chapter 3 policies of the Coastal Act.

- f) Modify the title of the Tribal Cultural Resources Mitigation and Treatment subsection on page 20 as follows:

Tribal Cultural Resources ~~Mitigation~~ Monitoring and Treatment

- g) Modify the Public Access section on page 22 as follows:

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

The south LCWA site is currently owned and managed by the applicant, the Los Cerritos Wetlands Authority. Due to the retention of private interests in adjacent areas of the Hellman Ranch property, as well as public safety concerns related to active oil extraction operations onsite, there is generally no public access allowed in this location without prior consent. Tribes have been offered access to and use of the site upon request. The proposed project does not change the public's inability to access the site, nor does it impact the surrounding areas that are accessible to the public. Given that the site contains wetlands and environmentally sensitive habitat area, which are natural resources particularly prone to disturbance and overuse, the Commission finds that continued limited public access may be the most protective of coastal resources at this time. At a future date when the coming restoration plan is proposed to the Commission, the applicant has indicated that the public would be provided increased access, and coastal-dependent recreational activities may be provided at this site, consistent with the public access and recreation policies of the Coastal Act. As mentioned in the previous section, the LCWA also intends to expand tribal access at the site upon completion of the related restoration project.

The applicant has reiterated the importance of continuing to offer tribal access to and use of the Sacred Site for religious, ceremonial purposes, and resource and material gathering.

h) Modify the last complete paragraph of Uses on page 26 as follows:

Restoration is one of the specifically enumerated uses for which dredge of wetlands is allowed by Section 30233(a)(6). On its face, the proposed project is *not* a restoration project; however, the proposed geotechnical and environmental site assessment will help determine the suitability of the soil for future restoration efforts. Section 30233(a)(6) allows dredging-related impacts to wetlands for “restoration purposes.” The purpose of the proposed project is specifically for *pre*-restoration research. Information from the geotechnical assessment will be used to develop an understanding of the subsurface physical and geotechnical soil conditions, as well as geotechnical engineering recommendations for use in designing future landform alterations and wetlands improvements as part of the larger restoration effort. More specifically, the data acquired by this investigation would enable the applicant to determine the design for flood management (e.g., berms and floodwalls), the stability of the grading site, evaluation of cut materials for their suitability as a safe and effective reused fill material onsite, and, most importantly, the residual chemical concentration of the soil substrate as a result of prior history of oil operations in the area. The current proposal may be categorized as a resource dependent activity performed for the broader goal of future restoration and wetlands enhancement at this site. Therefore, the project is an allowable use under Coastal Act Sections 30233(a)(6) and (a)(7), and **Special Condition 6** will help further establish the relationship of the proposed project with broader restoration activities by requiring the applicant to share the findings of this investigation with the Commission, which will elucidate the restoration potential of the site in the future. The Commission also recognizes that the biological resources and wetlands at this site are significant tribal cultural resources, and, as such, the results will also be shared with the affected Native American Tribes.

i) Replace Table 1 on page 5 of **Exhibit 2** with the following:

Table 1. Target Coordinates, Existing and Proposed Elevations, and Target Boring Depths for Proposed Sampling Locations

Core Sample ID	Vegetation Type	Proposed Habitat and/or Construction Element	Latitude (Decimal Degrees)	Longitude (Decimal Degrees)	Existing Elevation (feet NAVD88)	Proposed Cut Elevation (feet NAVD88)	Depth of Z Layer Below Proposed Elevation (feet)	Target Boring Depth (feet bgs)	Sampling Equipment	Purpose for Investigation
LCW-01	Brassica nigra and Other Mustards Herbaceous Semi Natural Alliance	Low intertidal (new channel)	33.751029	-118.103952	8.6	-1.8	0.5	10.9	Hand auger	Invert of future main tidal channel connection
LCW-02		Cordgrass marsh	33.752402	-118.102136	8.5	2.9	0.5	6.1	Hand auger	Invert of future tidal creek. No chemistry data for fill area.
LCW-03		Mid marsh	33.751121	-118.102236	8.1	4.3	0.5	4.3	Hand auger	Invert of future tidal creek. No chemistry data for fill area.
LCW-04		Mid marsh	33.751666	-118.101089	9.9	4.3	0.5	6.1	Hand auger	Invert of future tidal creek. No chemistry data for fill area.
LCW-05		Mid marsh (landfill cut)	33.749776	-118.102129	13.5	4.3	0.5	9.7	HSA drill rig	Landfill area that could be converted to marsh.
LCW-06		Low intertidal (new channel)	33.749962	-118.101875	11.2	-1.8	0.5	13.5	HSA drill rig	Invert of future main tidal channel. No chemistry data for fill area.
LCW-07		Low intertidal (new channel)	33.750203	-118.100135	10.3	-1.8	0.5	12.6	HSA drill rig	Invert of future main tidal channel. No chemistry data for fill area.
LCW-08		Iceplant Mats	Mid marsh (berm cut)	33.751556	-118.099809	10.9	4.3	0.5	7.1	Hand auger
LCW-09	Vegetation free zone (Dirt Access Road)	Low intertidal (culvert removal)	33.751835	-118.099292	7.1	-1.8	0.5	9.4	HSA drill rig	Roadway culvert crossing. Geotechnical data for culvert removal.
LCW-10	Brassica nigra and Other Mustards Herbaceous Semi Natural Alliance	Mid marsh	33.750852	-118.098689	10.6	4.3	0.5	6.8	HSA drill rig	Invert of future tidal creek. No chemistry data for fill area.
LCW-11		Low intertidal (new channel)	33.750586	-118.097625	11	-1.8	0.5	13.3	HSA drill rig	Invert of future main tidal channel. No chemistry data for fill area.
LCW-12		Mid marsh	33.750854	-118.096291	12.2	4.3	0.5	8.4	HSA drill rig	Invert of future tidal creek. No chemistry data for fill area.
LCW-13	Vegetation free zone (Dirt Access Road)	Low intertidal (culvert removal)	33.751569	-118.096288	7.6	-1.8	0.5	9.9	HSA drill rig	Roadway culvert crossing. Geotechnical data for culvert removal.
LCW-14	Development	New bridge	33.750619	-118.103914	9.5	--	--	25	HSA drill rig	Geotechnical data for culvert removal and potential bridge installation.
LCW-15	Development	New berm	33.753027	-118.099959	8.6	--	--	25	HSA drill rig	Geotechnical data for road improvements and new flood control berm.
LCW-16	Brassica nigra	New berm	33.753416	-118.096962	6.5	--	--	25	HSA drill rig	Geotechnical data new flood control berm.
LCW-17	Bassia hyssopifolia	New berm	33.752100	-118.095007	5.5	--	--	25	HSA drill rig	Geotechnical data new flood control berm.
LCW-18	Brassica nigra	New berm	33.751745	-118.091871	10.2	--	--	25	HSA drill rig	Geotechnical data new flood control berm.

Notes:

1. Based on NAD83
2. Proposed cut elevation is based on the habitat elevation ranges for full tidal conditions (no muting), as presented in Table 6-1 of The Los Cerritos Wetlands Habitat Restoration Plan (CRC 2021). The lower end of the elevation range was conservatively used.
3. For environmental borings, target boring depth includes the depth to achieve design depth plus Z-layer sample for chemistry borings.
4. A hand auger is required due to limited access. bgs: below ground surface

HSA: hollow stem auger

NAD83: North American Datum of 1983 NAVD88: North American Vertical Datum of 1988