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F9a

May 6, 2024

TO: Coastal Commissioners and Interested Parties

FROM: Dr. Kate Huckelbridge, Executive Director
Cassidy Teufel, Deputy Director
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SUBJECT: Addendum to Staff Report for Consistency Determination No. CD-0001-24 (United States Army Corps of Engineers).

This addendum hereby incorporates into the staff recommendation for agenda item F9a (CD-0001-24) and into the pertinent Coastal Commission findings otherwise set forth in the April 25, 2024, staff report, the following changes or additions to the condition and findings that were not completed prior to the publication of the staff report.

CHANGES TO STAFF REPORT

~~Strikethrough~~ indicates text deleted from the findings pursuant to this addendum and underline indicates text added to the findings pursuant to this addendum.

a) Revised text in the condition:

1. Revised Habitat Mitigation and Monitoring Plan. WITHIN SIX MONTHS OF COMMISSION CONCURRENCE WITH THE USACE CONSISTENCY DETERMINATION, USACE shall provide a revised final version of the Draft *Hollywood Beach Western Showy Plover Habitat Expansion and Enhancement Plan* (Plan) dated March 2024, ~~for the review and approval of to the Commission's Executive Director for review.~~ The Corps will carefully consider all comments by the Commission's Executive Director and will make all reasonable efforts to ensure that the concerns expressed are resolved and any necessary revisions are incorporated into the Plan. The revised Plan shall include, but not be limited to the following:

- A post-project quantification of the permanent adverse impacts to the coastal strand and southern foredune Environmentally Sensitive Habitat Areas (ESHA) as a result of each dredging event and confirmation that the mitigation acreage

proposed in the Plan is sufficient to meet the required mitigation ratio for the adverse impacts to ESHA of at least 3:1. If an impact occurs during any given dredge event then future impacts within that same footprint will not be considered a new impact in subsequent cycles, and once mitigated it will be considered fully mitigated and not subject to future mitigation.

- A timeline for implementation of the Plan by the end of ~~2024~~2025 and information on how the mitigation ratio(s) could be modified to account for temporal lag in the event that project implementation is significantly delayed.
- Revised dune expansion/creation and enhancement methods to include the following:
 - Dune recontouring shall only occur in dune areas highly invaded by European beach grass (*Ammophila arenaria*) and highway iceplant (*Carpobrotus edulis*) such that they have attained abnormal heights. In these areas the focus shall be on achieving a back dune slope of 3:1 or less, as opposed to targeting a height of not more than six feet. Excess sand resulting from dune recontouring will be used in dune expansion.
 - Provision of an Integrated Pest Management Plan that describes the steps and details required to eliminate and remove invasive plant species through hand and mechanical removal, horizon flipping in consultation with United States Fish and Wildlife Service (USFWS), and, if necessary, pesticide (herbicide) application. For areas where hand and mechanical methods are not practical, such as where the invasive European beach grass and highway iceplant are widespread and well established, chemical treatment ~~methods using~~ will employ the appropriate glyphosate ~~herbicide mix formula and~~ with surfactants (adjuvants) considered to be the least toxic ~~and persistent herbicides and adjuvants~~ appropriate for the target species, and constituting the least environmentally damaging alternative. If chemical treatment is deemed to be necessary, a California licensed Pest Control Advisor (PCA) must provide written recommendations regarding the appropriate herbicides and adjuvants for the respective circumstances and species. The product registration number(s) should be provided along with a complete description of how they will be used, including criteria and limits for if/when/how (including frequency and total number of applications), precautions that would be taken for sensitive species (e.g., buffers) and potential runoff, and triggers for adaptive management or remedial actions. In no instance shall spray herbicide application occur if wind speeds on site are greater than 5 mph or 48 hours prior to predicted rain. In the event that rain does occur, herbicide application shall not resume again until 72 hours after rain. Herbicide applications during the rainy season shall be timed to avoid rainfall events. For all work involving chemical applications, a PCA or Qualified Licensed Applicator (QLA) must be on site.
 - Dead invasive plant material that is not left to decompose in place (e.g. highway iceplant) must be transported to a land fill. No invasive plant material shall be buried in the beach below the waterline.

- Application of erosion control BMPs in areas where invasive species are removed until dune recontouring and planting with native species can take place.
 - Dune expansion Plans including maps/exhibits of the proposed expansion area, methods for sand retention (e.g. sand fencing, sterile hay plugs, etc.), plant palette, source of plant material (seeds and seedlings), maintenance activities, signage, public access routes, etc.
 - Monitoring program that includes the sampling design (schedule and type of qualitative and quantitative monitoring), a map depicting sampling design elements (e.g. permanent photo points and transects or quadrats), annual and final success criteria based on reference sites or the peer-reviewed literature, and statistical basis for judging success.
- In addition to the six-year final monitoring report, annual monitoring reports shall be submitted to ~~United States Fish and Wildlife Services (USFWS)~~ and the Executive Director for review. Annual monitoring reports shall include: an assessment of dune and western snowy plover habitat conditions and issues such as trash, erosion, invasive vegetation, or pests; a general description of the dune morphologic and vegetation conditions along with photos from permanent photo points strategically located and mapped on an exhibit in the final plan depicting the sampling design; a determination as to whether the dunes have met that annual success criteria; and whether the dunes are expected to meet Year six success criteria.
 - Objective performance standards that will allow future assessment of the success of the habitat expansion and enhancement, along with Ddetailed criteria for development and implementation of any adaptive management strategies determined to be necessary if the habitat is not meeting performance standards. Implementation of any adaptive management strategies would require prior review and approval of the Executive Director.
 - ~~Removal of the discussion that the performance criteria in the Plan are not obligatory performance metrics.~~

b) Revised text in the second paragraph on page 8:

The Port includes two entrance jetties, an Approach Channel, Entrance Channel, Channel A, and a Turning Basin. Sediment buildup at the Port is not as significant as CIH and the Port would be dredged less frequently, with up to 250,000 cubic yards of material dredged every other year. The Approach Channel to the Port would be maintained at -44 feet mean lower low water (MLLW) and the Entrance Channel would be maintained at -40 feet MLLW. Dredging would occur to authorized depths plus two feet of allowable over-depth. Only a portion of the Entrance Channel requires dredging and any additional dredging of the Entrance Channel would require additional sediment analysis to determine whether it would be suitable for placement at nearby deposition sites. Channel A and the Turning Basin would not be dredging as part of this project (Exhibit 2). Maintenance dredging at the Port has occurred regularly since 1975.

- c) Revised text in the last paragraph on page 8:

At CIH, up to 2.5 million cubic yards would be dredged biennially (i.e. every other year) from the Entrance Channel, Sand Traps, and the Entrance Basin (Area E) (Exhibit 2). The Entrance Channel (Area A) and Entrance Basin (Area E) would be dredged to a depth of -20 feet MLLW. Sand Traps B, C, and D would be dredged to a depth of -35 feet MLLW, and Sand Trap G (South Approach Channel) would be dredged to a depth of -25 feet MLLW. Dredging would occur to authorized depths plus two feet of allowable over-depth. The inner basin of CIH, Area F, would not be dredged as part of this project.

- d) Revised text in the fourth paragraph on page 9:

Deposition

Both projects would place the predominantly sandy dredged material on the beach at Silver Strand and either onshore or nearshore at Hueneme Beach. Dredging and deposition is scheduled to occur during the period of October through mid-March. Silver Strand Beach would receive up to 200,000 cubic yards of material per dredging cycle while Hueneme Beach and the Hueneme nearshore placement site would receive up to 2.75 million cubic yards.

- e) Revised text in second paragraph on page 10:

National Marine Fisheries Service

In accordance with the 1996 amendments to the Magnuson-Stevens Fishery Management and Conservation Act, USACE conducted an assessment of Essential Fish Habitat (EFH) for the proposed project. USACE concluded that the proposed project would not result in substantial ~~or~~ adverse impacts to EFH and The National Marine Fisheries Service (NMFS) concurred with USACE's determination on February 29, 2024.

- f) Revised text in second to last paragraph on page 13:

Alternatives

The majority of the proposed dredging involves work within areas that have historically been dredged for decades and have not been associated with adverse impacts to coastal resources. However, Area D located landward of the breakwater at CIH is directly adjacent to, and contains a portion of, coastal foredune habitat (**Exhibit 3**). Areas C and D accounts for the majority approximately 500,000 cubic yards of the 2.5 million cubic yards dredged every other year at CIH, including a quantity of, but not limited to, approximately 500,000 cubic yards from Area D. As discussed in more detail later in this report, coastal foredune habitat constitutes Environmentally Sensitive Habitat Area (ESHA) pursuant to Section 30107.5 of the Coastal Act. Dredging of the 500,000 cubic yard allotment within Area D would likely result in some amount of slope failure, destabilization and sloughing of coastal

foredune habitat, which would result in permanent adverse impacts to the foredune ESHA.

- g) Revised text in the last paragraph on page 14:

The first alternative included increased dredging within the entrance channel and the basins or increased dredging of the other sand areas (Area B and Area C), or deeper dredging within Area D outside of a 200-foot buffer area around the dunes. Deeper dredging in these areas could allow USACE to reach the target volume of dredged material while avoiding adverse impacts to the dunes from dredging within Area D. However, since sand supply moves from north to south in this area and the CIH entrance, breakwaters and sand traps serve to block sand movement to downcoast beaches and areas, USACE determined that Areas C and D contains the majority of sandy material...

- h) Revised text to last paragraph on page 17:

California Grunion

The California Grunion (*Leuresthes tenuis*) is a small fish in the silversides family and is extremely unusual among fish in its spawning behavior. The grunion spawn on the sandy beaches in the project vicinity immediately following high tides. The eggs are incubated in the sand until the following series of high tide conditions, approximately 10 to 15 days, when the eggs hatch and are washed into the sea. California grunion is a species of concern due to its unique spawning behavior. The project could adversely affect grunion by smothering adult fish during runs or by smothering the developing eggs of the fish by covering them with sand during deposition of sandy material. Also, heavy machinery has the potential to crush grunion and incubating eggs. To avoid adverse impacts to grunion, project activities would be scheduled to primarily avoid dredging between March 1st and August 31st, which would be outside of the grunion spawning season. ~~Additionally, to avoid any potential adverse impacts to grunion that may be in the area outside of the spawning season, beach placement would be limited to a diked, single-point displacement site to minimize turbidity and grunion smothering.~~

- i) Revised text in second paragraph on page 18:

To avoid potential water quality impacts associated with the proposed dredging and beach placement activities, the biological, chemical and physical characteristics of the sediments were previously evaluated through the sediment sample analyses described above and found to be suitable for placement at Silver Strand, ~~and Port Hueneme Beaches~~, and/or the Hueneme Nearshore Placement Site. Additionally, USACE would implement a water quality monitoring plan that would include weekly analysis of salinity, pH, temperature, DO, turbidity, and light transmissivity. Dredging would be modified as necessary to ensure that these water quality compliance thresholds are maintained.

j) Revised text in last paragraph on page 18:

...In addition, Condition One would require the plan to include the necessary information and to submit it for ~~the review and approval of~~ to the Executive Director within six months of the Commission's concurrence with the CD. The Corps will carefully consider all comments by the Commission's Executive Director and will make all reasonable efforts to ensure that the concerns expressed are resolved and any necessary revisions are incorporated into the Plan.

k) Revised text in first paragraph on page 22:

...That area is located landward of the breakwater at CIH and is directly adjacent to, and contains a portion of, coastal foredune habitat (**Exhibit 3**) that was able to establish, in part, due to the absence of consistent dredging in the most landward portions of the Area D sand trap. Area D accounts for, but is not limited to, approximately 500,000 cubic yards of the 2.5 million cubic yard, biennial dredging design volume at CIH. In 2022, dredging of the full 500,000 cubic yard allotment within Area D would have resulted in some amount of slope failure, destabilization and sloughing of coastal foredune habitat, which would have resulted in permanent adverse impacts to the foredune ESHA.

l) Revised text in second paragraph on page 24:

For future dredging events that would take place as part of this six-year cycle, USACE has stated that it may not dredge all of Area D depending on the availability of project funds and depending on when it reaches the target volume of 2.5 million cubic yards of material within CIH. Also, USACE committed to sequence the dredging at CIH to prioritize dredging within Area D last (to the maximum extent possible with regards to safety, weather conditions, and logistic issues), so that once the target volume of dredged material is reached, dredging would cease. This project sequencing is intended to ensure that dredging within Area D and the resulting adverse impacts to dunes would be minimized to the extent possible.