



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Marine Region
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**ALAMITOS BAY ENTRANCE CHANNEL MAINTENANCE DREDGING PROJECT
PUBLIC NOTICE – APPLICATION FOR PERMIT
SPL-2023-00708-GSH**

Dear Ms. Holdridge:

The California Department of Fish and Wildlife (Department) received a Public Notice – Application for Permit (Application) from the United States Army Corps of Engineers (USACE) for the Alamitos Bay Entrance Channel Maintenance Dredging Project (Project).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

DEPARTMENT ROLE

The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state (Fish and Game Code, section 711.7, subd. [a] & 1802; Public Resources Code, section 21070; CEQA Guidelines section 15386, subd. [a]). The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., section 1802). Similarly for purposes of National Environmental Policy Act, the Department, under its Trustee authority, provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. The Department is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California and ensuring fisheries are sustainably managed under the Marine Life Management Act. Pursuant to our

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jurisdiction, the Department has the following comments and recommendations regarding the Project.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Long Beach Department of Public Works (City)

Objective: The objective of the proposed Project is to conduct a one-time maintenance dredging of the Alamitos Bay Entrance Channel (Entrance Channel) to maintain adequate navigational depths, and to address erosion by disposing the dredged material at Peninsula Beach for beach nourishment. The dredge footprint of the Entrance Channel is 35.1 acres, and the total volume of material proposed for dredging is estimated to be up to approximately 415,000 cubic yards. Maintenance dredging is planned to a design depth of -20 feet mean lower low water with 2 feet of overdredge allowance. The dredged sediment from the Entrance Channel would be used for beach nourishment to build a broad, gently sloping beach at Peninsula Beach, approximately 123 acres. The total volume of material proposed for beach nourishment is up to 415,000 cubic yards. Primary Project activities include dredging the Entrance Channel using hydraulic cutter-section dredge equipment and pumping the dredged material directly to the adjacent Peninsula Beach on the west side of the Entrance Channel's jetty. The Project's dredged materials were determined suitable for beach nourishment by the Southern California Dredged Material Management Team on May 28, 2024.

Location: The Project site is located in Alamitos Bay in the city of Long Beach, Los Angeles County, California. The site's midpoint coordinates are 33.741074, -118.118368.

BIOLOGICAL SIGNIFICANCE

Discussion and Comment: The Alamitos Bay (Bay) waters support many resident and migratory fish and special status wildlife such as seabirds, marine mammals, and sea turtles. Important marine plants such as eelgrass (*Zostera marina*) support those fish and wildlife species and may be present throughout shallow coastal environments in the Bay. Eelgrass is important as fish nursery habitat and supports juvenile and adult fish. The Bay waters also support commercially and recreationally important fish and invertebrate species such as California halibut (*Paralichthys californicus*), California spiny lobster (*Panulirus interruptus*), and Northern anchovy (*Engraulis mordax*), which is an important forage fish.

COMMENTS AND RECOMMENDATIONS

The Department offers the comments and recommendations below to assist USACE in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife resources.

California Grunion

Comments: California grunion (*Leuresthes tenuis*) leave the water at night to spawn on beaches during the spring and summer months. For four consecutive nights, beginning on the nights of the full and new moons, spawning occurs after high tides and continues for several hours. Spawning occurs from March 1st through August 31st, and occasionally in February and September, with peak spawning in late March through June. Eggs are deposited during the highest tides of the month and incubate in the sand during the lower tides where they are kept moist by residual water in the sand. Eggs hatch after approximately 10-14 days, during the next high tide series, when they are inundated by water and agitated by surf; however, eggs can remain viable for over a month in the sand. Through personal communication with USACE, the City informed USACE that they would like to preserve the ability to conduct beach nourishment activities during grunion season. The Department is concerned that the Project's beach nourishment/sediment placement construction activities may impact grunion spawning and hatching.

Recommendation: The Department recommends all beach nourishment construction activities, including the use of heavy equipment, occur outside of the grunion spawning season (March 1st through August 31st). If avoiding the grunion spawning season is not feasible during sediment placement, the Department recommends that all activity related to sediment placement be restricted to above the kelp wrack line or the Higher High Water line from March 1st to August 31st. The Department also recommends that grunion monitoring should be conducted in the Project area where sediment placement may occur during spawning and hatching events. Furthermore, the locations of the spawning run should be marked physically and/or by Global Positioning System (GPS) locations. The density of the grunion throughout the area should be noted using the Walker Scale. The Project should ensure that maintenance workers avoid the spawning and hatching area and that a 50-foot buffer is used to avoid impacting any areas adjacent to the sediment placement sites. If grunion spawning occurs within the Project area, work in that area should cease and not be conducted until after the grunion eggs have hatched (2 weeks). The expected run schedule and further information about grunion can be found on the Department's website: <https://wildlife.ca.gov/Fishing/Ocean/Grunion>.

Native Eelgrass Impacts

Comments: The Application notes that eelgrass is a species that is present within the Project area where dredging activities may occur. A total of 184 square meters of eelgrass were found dispersed within the Entrance Channel. Native eelgrass species create large beds beneficial for fish habitat and have been identified as special aquatic sites and given protections by the Clean Water Act. The Magnuson-Stevens Fishery Conservation and Management Act (MSA) identifies eelgrass as a Habitat Area of Special Concern. Additionally, the importance of eelgrass protection and restoration, as well as the marine ecological benefits of eelgrass, is identified in

the California Public Resources Code (PRC section 35630). The Department uses the California Eelgrass Mitigation Policy (CEMP) (NOAA 2014, Attachment 1), developed by the National Marine Fisheries Service, for guidance on surveying eelgrass, avoiding and minimizing impacts to eelgrass, assessing eelgrass impacts, eelgrass mitigation measures and compensation, and for identifying appropriate eelgrass mitigation and donor sites.

The Department appreciates that the City plans to conduct comprehensive pre- and post-construction surveys for eelgrass beds or patches within the Project area consistent with the CEMP. According to the Application, the City also plans to mitigate for any eelgrass impacts caused by the Project using guidance described within the CEMP if any unavoidable eelgrass impacts occur.

Recommendations: The proposed Project should avoid and minimize disturbance and damage or losses of eelgrass beds from dredging activities and associated construction barges and vessels. The Department recommends that plans be developed consistent with the CEMP to avoid and minimize potential impacts to eelgrass to the maximum extent feasible if eelgrass beds or patches are identified within or adjacent to the Project area. Impacts to avoid and minimize may include, at a minimum, barge shading and anchoring within eelgrass habitat, bottom disturbances, turbidity, and sedimentation.

If eelgrass harvest and transplanting is required for mitigation, a Scientific Collecting Permit (SCP) from the Department will be required prior to harvest and transplanting activities. The SCP may include permit conditions such as donor eelgrass surveys, submittal of an eelgrass harvest and transplant plan, limits on number of turions collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit the Department's SCP webpage for more information: <https://wildlife.ca.gov/Licensing/Scientific-Collecting>.

Marine Mammal and Sea Turtle Monitoring

Comments: Harbor seals (*Phoca vitulina*), California sea lions (*Zalophus californianus*), other species of marine mammals, and sea turtles, including the federally threatened green sea turtle (*Chelonia mydas*), may be present or occur within the Project area. Construction activities, such as dredging and beach nourishment, within the Project area have the potential to impact these animals if they are present.

Recommendations: The Department recommends that the City prepare and implement a marine mammal and sea turtle monitoring plan that includes, but is not limited to:

- Establishment of an underwater exclusion zone as a designated focus area for species protection to allow animals to evacuate the area prior to commencement of construction activities;

- Construction activities should not occur while marine mammals or sea turtles are present within the exclusion zone;
- Pre-construction monitoring to update the occurrence and use of the area by marine mammals and turtles; and
- Monitoring of marine mammals and sea turtles by an experienced observer immediately prior to and during all construction activities.

The Department recommends that the City consult with the National Marine Fisheries Service and United States Fish and Wildlife Service regarding the above recommendation and any other necessary avoidance and mitigation measures to reduce impacts to marine mammals and sea turtles.

Invasive Species Impacts

Comments: Disturbance of the bottom sediments from dredging may redistribute non-native species that compete with native species. This could cause widespread adverse impacts to eelgrass and marine ecology. The invasive alga *Caulerpa taxifolia* is listed as a federal noxious weed under the U.S. Plant Protection Act and while deemed eradicated in 2006 is monitored for potential future emergence. Another invasive alga species found recently in Newport Bay and San Diego Bay is *Caulerpa prolifera*, which is also a potential threat to growth and expansion of native eelgrass beds and other native algae. *Caulerpa prolifera* can grow as deep as 50 meters and appears to be more tolerant of low light environments than most other macroalgae. Additionally, since all *Caulerpa* species pose a serious risk in harming native marine life, Fish and Game Code Section 2300 was amended in 2023 so that no person shall sell, possess, import, transport, transfer, release alive in the state, or give away without consideration all species of the genus *Caulerpa*, with the exception of bona fide scientific research upon authorization by the Department. While the Department appreciates that the Application notes that the City would conduct pre-construction *Caulerpa taxifolia* surveys, the Department is concerned that all species of *Caulerpa* may not be surveyed.

Recommendations: The Department recommends conducting pre-construction *Caulerpa spp.* surveys to identify potential existence of invasive *Caulerpa spp.* in accordance with the Caulerpa Control Protocol <https://media.fisheries.noaa.gov/2021-12/caulerpa-control-protocol-v5.pdf> (October 2021). Any sightings of *Caulerpa spp.* should be reported within 24 hours to the Department (Caulerpa@wildlife.ca.gov), and NMFS at 562-980-4037 (nmfs.wcr.caulerpa@noaa.gov).

CONCLUSION

The Department appreciates the opportunity to comment on the Application to assist USACE in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Leslie Hart, Environmental Scientist at R7CEQA@wildlife.ca.gov.

Sincerely,



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Marine Regional Manager

ec: Claire Waggoner, Environmental Program Manager
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ATTACHMENT

Attachment 1: NMFS. 2014. California Eelgrass Mitigation Policy, National Marine Fisheries Service.