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Notice of Exemption

To:
Governor's Office of Land Use and Climate Innovation
CEQA Submit

From:
Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, CA 92123

Project Title: Catalina Island Restoration Project (Project)

Project Location: The Project is proposed to occur throughout Santa Catalina Island (central location 33.382117 N, 118.433406 W).

Project Description: The Project consists of the California Department of Fish and Wildlife's issuance of a Restoration Management Permit (RMP) to the Catalina Island Conservancy pursuant to Fish and Game Code section 1670 et seq. The RMP would provide the Conservancy with take authorization under Fish and Game Code section 1672, subdivisions (b) and (e), for various ecosystem restoration and related activities that will occur throughout Santa Catalina Island (Catalina).

Public Agency Approving Project: California Department of Fish and Wildlife, South Coast Region

Person or Public Agency Carrying Out Project: Santa Catalina Island Conservancy

Exempt Status: ☒ Statutory Exemption: Public Resources Code section 21080.56 (Statutory Exemption for Restoration Projects)

Reasons why project is exempt: See attached.

CDFW Contact Person: Erinn Wilson-Olgin, Regional Manager, (858) 467-4201

Signature: DocuSigned by: B6E58CFE24724F5... *Date:* 1/28/2026

Erinn Wilson-Olgin, Regional Manager
California Department of Fish and Wildlife

Date received for filing at OPR: _____

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State of California – Natural Resources Agency
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
1416 9th Street, Ste. 1341
Sacramento, CA 95814
www.wildlife.ca.gov

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

January 28, 2026

ATTACHMENT TO NOTICE OF EXEMPTION
Catalina Island Restoration Project

The Project consists of the issuance of a Restoration Management Permit (RMP) by California Department of Fish and Wildlife (CDFW) South Coast Region to the Santa Catalina Island Conservancy (Conservancy) pursuant to Fish and Game Code section 1670 et seq. The RMP would provide the Conservancy with take authorization under Fish and Game Code section 1672, subdivisions (b) and (e), for various ecosystem restoration and related activities that are proposed to occur throughout Santa Catalina Island (Catalina).

On January 12, 2026, CDFW South Coast Region filed a request with the Director of CDFW (Director) seeking the Director's concurrence that the Project meets the eligibility requirements of subdivisions (a) through (d) of Public Resources Code section 21080.56 (Section 21080.56), also known as a Statutory Exemption for Restoration Projects (SERP). On January 27, 2026, the Director's designee issued a concurrence decision under Section 21080.56, subdivision (e). Following the concurrence decision from the Director, CDFW South Coast Region determined on January 28, 2026 that the Project is exempt. As required by Section 21080.56, subdivision (g), CDFW South Coast Region is required to file a Notice of Exemption (NOE) within 48 hours of making that determination.

The Project qualifies for SERP because it meets the following conditions: (1) the Project is exclusively to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or is exclusively to restore or provide habitat for California native fish and wildlife; (2) the Project has public benefits incidental to the Project's fundamental purpose; (3) the Project will result in long-term benefits to climate resiliency, biodiversity, and sensitive species recovery; and includes procedures and ongoing management for the protection of the environment; and (4) Project construction activities are solely related to habitat restoration.

The reasons for the exemption are more fully described in the following documents, both of which are included as exhibits to this NOE:

1. The Department's January 12, 2026 "CEQA Statutory Exemption For Restoration Projects Concurrence Request"; and
2. The Director's designee's concurrence decision finding the Project meets the SERP qualifying criteria.

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Attachment 1

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CEQA STATUTORY EXEMPTION FOR RESTORATION PROJECTS (SERP) CONCURRENCE REQUEST

Completion and submission of this form is voluntary. This form may be submitted to request concurrence from the Director of Fish and Wildlife pursuant to Public Resources Code section 21080.56.

The Lead Agency may submit this signed form (pdf) and all attachments via the Department's Environmental Permit Information Management System (EPIMS) Document Repository or via email at restorationpermitting@wildlife.ca.gov.

1. LEAD AGENCY

Lead Agency Name:	California Department of Fish and Wildlife, South Coast Region
Contact Person's Name:	Erinn Wilson-Olgin
Street Address:	3883 Ruffin Rd
City, State, Zip:	San Diego, CA 92123
Contact Person's Telephone:	(562) 900-8138
Contact Person's E-mail:	catalinarestoration@wildlife.ca.gov

2. PROJECT PROPONENT ☐ Check Box and Skip to Number 3 if Same as Lead Agency

Business/Agency/Organization:	Santa Catalina Island Conservancy
Contact Person's Name:	Lauren Dennhardt
Street Address:	320 Golden Shore, STE 220
City, State, Zip:	Long Beach, CA 90802
Contact Person's Telephone:	651-503-6979
Contact Person's E-mail:	ldennhardt@catalinaconservancy.org

3. PROJECT INFORMATION

A. Project Name:	Catalina Island Restoration Project
B. County or Counties:	Los Angeles
C. Lat./Long. Coordinates:	33.382117 N, 118.433406 W
D. Estimated Project Start/End Dates:	The Restoration Management Permit (RMP) application submitted to the Department of Fish and Wildlife (CDFW) proposes a 10-year duration for permitted activities. The Department estimates that the project start date will be approximately January 2026 and the end date will be approximately January 2036.

E. Provide a brief description of the future discretionary Project approval the Lead Agency is considering (see CEQA Guidelines sections 15352 and 15378) and an approximate date range for when the Lead Agency may make that approval if the Lead Agency obtains a SERP concurrence from CDFW.
CDFW's South Coast Region (hereinafter referred to as South Coast Region) is acting as the Lead Agency under the California Environmental Quality Act (CEQA) and is considering the issuance of an RMP to the project proponent, Santa Catalina Island Conservancy (Conservancy), under the Restoration Management

Permit Act (Fish & G. Code § 1670 et seq.) for the Catalina Island Restoration Project (Project). The approximate estimate for issuance of the RMP by South Coast Region is January 2026.

F. Provide a brief description of the Project location, size, and funding sources. Please cite and attach any supporting documents.

The RMP would provide the Conservancy with take authorization under Fish and Game Code section 1672, subdivisions (b) and (e), for various ecosystem restoration and related activities that will occur throughout Santa Catalina Island (Catalina).

The majority of Project-related activities will occur on land owned and managed by the Conservancy, a 501(c)(3) nonprofit organization. The Conservancy owns and manages roughly 88% (171 km^2) of Catalina. Catalina is located approximately 34 km south of Long Beach, California, and is within the Channel Islands biodiversity hotspot. The Project area encompasses the entirety of Catalina, centering on 33.382117 N, 118.433406 W.

The Conservancy is expected to provide funding for the Project. The Conservancy also expects to pursue grant opportunities to help fund implementation of the Project.

Attached as supporting documentation, and hereby incorporated by reference, are the four documents submitted to the South Coast Region by the Conservancy as its RMP application package: the RMP application, Catalina Island Restoration Project 10-Year Workplan (Workplan), Island Restoration Scientific Assessment (IRSA), and Habitat Restoration and Monitoring Plan (HRMP) (all four documents collectively referred to hereinafter as the RMP Application Package).

G. Provide a brief Project description, including any post-restoration work, operation and maintenance, or other related activities. Summarize the Project's expected environmental benefits (e.g., acres or stream-miles restored/enhanced, species benefitted, etc.). Please cite and attach any supporting documents.

The purpose of the Project is to conserve, restore, protect, enhance, and assist in the recovery of California native wildlife, and the habitat upon which they depend (see HRMP section 1.2; Workplan section 1). The Conservancy has provided South Coast Region with Project background information and a full description of proposed Project-related activities in its RMP Application Package, which is being submitted along with this concurrence request and contains the most complete, accurate, and current Project description. Major components of the proposed Project are briefly described below with references to the relevant documents in the RMP Application Package where appropriate.

The RMP Application Package indicates that the island ecosystem of Catalina has been and continues to be degraded by a history of invasive ungulates, including mule deer, which reduce vegetation cover and selectively browse on rare and endemic plants, as well as by the spread of invasive plant species that outcompete native plant communities and result in habitat type conversion. Island chapparal has shifted to invasive annual grasslands in most cases (HRMP sections 2.1.6, 2.1.7, 2.2.1). These challenges have caused a loss of plant and wildlife biodiversity, extirpation of native species, and diminished climate resiliency on Catalina (IRSA pp. 5–9). The lack of vegetation cover has also led to increased soil erosion, decreased water capture, and reduction in quality wildlife habitat (*ibid.*).

The Conservancy proposes to restore the ecological integrity and improve the climate resiliency of Catalina by protecting and enhancing the biodiversity of native plants and wildlife habitats through active restoration (HRMP section 4; Workplan section 2), invasive plant control and other biosecurity measures (HRMP sections 4.3, 4.5.4; Workplan section 3), and biological monitoring, resource protection, and documentation (HRMP section 5; Workplan section 4). The Conservancy's planned active restoration includes invasive plant control and management (mechanical and chemical removal); collecting, bulking, and reseeding; and non-permanent

fence building prior to removal of invasive mule deer. Biosecurity programs include a comprehensive invasive plant program; annual fox monitoring and infectious disease surveillance; and the removal of invasive mule deer. Monitoring and documentation measures include annual fox reporting; monitoring active restoration locations; lepidoptera, bird, shrew, small mammal, and herpetofauna surveys; and landscape level vegetation monitoring (see generally HRMP and Workplan).

The Conservancy indicates in its RMP Application Package that it has worked with Land IQ and the University of California Los Angeles to develop the HRMP (see HRMP p. vii). Procedures outlined in the HRMP include, but are not limited to, propagation of native seed, including germination trials, viability testing, and the production of rare and endangered plants of special concern using micropropagation, cuttings, hydroponics, aeroponics, and air layering.

The HRMP outlines all activities and locations where restoration could occur on Catalina. The Workplan is the 10-year implementation plan for the HRMP. Restoration actions identified within the HRMP and subsequent Workplan include initial dethatching of accumulated non-native invasive thatch and litter; seed collection, bulking (on and off-island), cleaning, and storage; propagation of container plants from seed and cuttings for outplanting on the landscape; sourcing plants from conservation collections and storage of Channel Islands and Catalina endemic plant species (HRMP section 1.3.8; Workplan sections 2.4, 2.5). Potential seed application methods include, but are not limited to, sowing by hand, broadcasting by hand and with devices such as a seed spreader, seed ball broadcasting, mechanical broadcast seeding with devices such as a push or motorized broadcast spreader, drill seeding manually or with a mechanized drill seeder, hydroseeding, imprint seeding, and remedial seeding. Selection of an appropriate technique for a site will be based primarily on conditions and accessibility.

Biosecurity measures as part of the Project focus on the prevention of introduction and spread of harmful species that threaten the ecosystem as a whole. The Catalina Invasive Plant Program (CIPP) prioritizes management of high-risk invasive plant species to mitigate their impact on the landscape and eradicate when feasible (HRMP Appendix A). The Project will include monitoring and vaccination to help inform management activities that are supporting the population of Catalina Island fox (*Urocyon littoralis catalinae*), listed as threatened under the federal Endangered Species Act (ESA) and threatened under the California Endangered Species Act (CESA). A full description of Project biosecurity measures is found in the HRMP. Removal of invasive mule deer is critical to the success of the Project to support the impacted endemic species on Catalina. Invasive mule deer will be removed and/or managed through sterilization, aerial/ground net capture, aerial/ground monitoring, aerial/ground transportation, detection dogs, ground shooting during the day and night, collaring, shooting from a ground vehicle, baiting, thermal detection, and euthanasia (Workplan section 3.5).

The Conservancy has developed a long-term monitoring plan (Workplan section 4.5) with the primary goal of measuring the biodiversity of plant and wildlife species across Catalina both before and after restoration activities. Monitoring is outlined in the HRMP (section 5.3) and Workplan (sections 3.2, 3.3, 3.4, 4) and includes lepidoptera capture and biodiversity analysis, population estimates of the Catalina Island fox, Santa Catalina Island shrew (*Sorex ornatus willetti*) surveys, analysis of active restoration sites, 60 long-term vegetation monitoring plots, monitoring of all native small mammals, and visual/audio bird monitoring (HRMP sections 1.3.9, 5.3.4, 5.3.5; Workplan sections 4.6, 4.7, 4.8).

The Project's expected long-term net benefits include enhancing the diversity of native plants and wildlife habitats, increasing carbon sequestration through revegetation, increasing resilience to climatic variation, and restoring ecosystem processes such as soil stability and water retention across Catalina. The expected benefits will be to all 47,884 acres of land and the 80.47 acres of water bodies throughout Catalina. Biodiversity of vegetation will increase through reduced browsing pressure on native plants and through propagating and outplanting of plant species. The Project will target invasive annual grasslands and restore them to coastal sage scrub, island chaparral, and native grassland. Since 1941, 31% of the island chaparral on Catalina has been converted into invasive annual dominated grasslands—a total loss of 1,988 hectares. The Conservancy is proposing to reverse that trend through intensive invasive plant management and reseeding, which will lead to a greater diversity of wildlife habitats for refuge, breeding, and foraging. For

example, increasing native species such as toyon (*Heteromeles arbutifolia*) and the endemic manzanita (*Arctostaphylos catalinae*) will increase forage availability for the Catalina Island fox (HRMP section 2.5).

H. CDFW recommends direct coordination with all interested California Native American tribes. Please provide a summary of the Lead Agency's engagement with tribes. Be careful not to include any sensitive or confidential information. Please cite and attach any supporting documents.

South Coast Region conducted outreach to ten tribes after formally requesting a list of relevant tribal contacts from the Native American Heritage Council. On October 17, 2025, South Coast Region sent tribal outreach letters to the following tribes: Gabrieleño Band of Mission Indians – Kizh Nation, Gabrielino-Tongva Indians of California Tribal Council, Gabrielino Shoshone Nation of Southern California, Gabrielino/Tongva Nation of the Greater Los Angeles Basin, Gabrielino-Tongva Tribe, Juaneño Band of Mission Indians-Achjachemen Nation, Pechanga Band of Luiseño Indians, Rincon Band of Luiseño Indians, San Gabriel Band of Mission Indians, and the Santa Ynez Band of Chumash Indians. Each tribal outreach letter included a 30-day response period and offered an opportunity for South Coast Region to facilitate conversations to better understand tribal perspectives. South Coast Region is committed to continuing any conversations and coordination that tribal governments wish to have regarding the Project.

In addition, the Conservancy informed South Coast Region that the Conservancy has also conducted outreach with representatives of the Gabrielino Tongva Indians of California Tribal Council, Gabrielino Shoshone Nation of Southern California, San Gabriel Band of Mission Indians, and Gabrielino-Tongva Tribe, including hosting site visits to Catalina in Spring 2023, 2024, and 2025 to discuss restoration on Catalina and other opportunities to collaborate. The Conservancy's tribal outreach resulted in inclusion of restoration work within the HRMP that tribes are interested in and other engagement opportunities.

I. CDFW recommends public outreach and coordination with interested parties and public agencies. Please provide a summary of the Lead Agency's engagement with interested parties and public agencies. Please cite and attach any supporting documents.

The Project has substantial public visibility. It has been the subject of public input and outreach as well as coverage from major media outlets, including, most recently, the Los Angeles Times and CBS News.

CDFW maintains an email address to receive public comments regarding the proposed Project (catalinarestoration@wildlife.ca.gov) and has received and considered several hundred email comments.

In addition, the Conservancy has provided South Coast Region with a summary of its own public outreach efforts, which are described below.

The Conservancy maintains a public webpage (https://catalinaconservancy.org/protect/) with details and documents related to the Project along with an email address (communications@catalinaconservancy.org) to receive ongoing comments from the public.

The Conservancy has informed South Coast Region that the Project as proposed in its RMP Application Package was crafted in response to feedback from community and interested parties regarding prior concepts for restoration on Catalina, including the proposed removal of invasive mule deer.

In 2022 and 2023, the Conservancy began early conversations with interested parties about the removal of invasive mule deer from Catalina. The Conservancy informed South Coast Region that it spoke to over 70 community leaders in the City of Avalon (Avalon) to receive their feedback and input on early concepts.

The Conservancy also hosted two advisory council meetings in June and July 2023. Invitees included representatives from local politicians, business leaders, and interested parties. Meetings included the receipt of public input and suggestions along with visiting restoration sites.

Following this public outreach, the Los Angeles Times published a story on October 1, 2023 about the Conservancy's plans for invasive mule deer removal.

On October 17, 2023, the Conservancy presented details about its concept for restoration on Catalina, including planned invasive mule deer removal, to the Avalon City Council during the City Council's regularly scheduled public meeting. Conservancy staff listened to public comment about the concept.

The Conservancy provided further public engagement by offering free tours of the area where proposed restoration activities would occur starting in November 2023 through January 2024, offering four to six tours per week, using extensive outreach in the Avalon local newspaper and on social media. These tours provided an opportunity for the public to directly ask Conservancy staff questions about the Project. In total, 30 local Catalina residents attended a tour offered by the Conservancy.

Additionally, the Conservancy has appeared in a variety of media outlets to answer questions regarding its prior restoration planning efforts over the last several years. Conservancy staff have been interviewed by The New York Times, Los Angeles Times, LAist, ABC7, The Catalina Islander, KTLA, GearJunkie, Fox News online, OpenSpaces, local radio station KISL, CBS National News, The Times of London, among others.

On December 13, 2023, Conservancy staff attended a California Fish and Game Commission meeting to provide additional information on the Conservancy's prior restoration planning efforts during open public comment.

On January 31, 2024, the Conservancy hosted a Community Forum on Catalina to discuss its restoration proposal, including invasive mule deer removal. Participants could attend in person or online and Spanish translation services were offered. A recording of the Community Forum is available online (https://vimeo.com/908792180/5f94a800eb?share=copy). The Conservancy posted on its website answers to every question that it received at the Community Forum (https://catalinaconservancy.org/wp-content/uploads/2024/02/Community-Forum-Questions-and-Answers-Final-1.pdf).

Also in 2024, the Conservancy advertised and hosted four different community conversations (occuring on September 11, April 8, March 18, and March 1) about the importance of restoration on Catalina and relevant science thereon. The Conservancy advertised these conversations in the Avalon local newspaper and sent out mailers to all residents of Avalon. The Conservancy also hosted a Last Friday Lecture Series titled Preserving the Catalina Island Fox with the Conservancy's Wildlife Conservation Manager Katie Elder on July 26, 2024.

In 2025, the Conservancy hosted two events as part of the Catalina Speaker Series: "A Community Conversation About Wildfire Prevention and Collaboration" on February 28, 2025, and "A Spotlight on Protecting and Restoring Catalina's Amazing Oak Ecosystem" on April 25, 2025. Both events included discussion about the Conservancy's proposed efforts to restore Catalina's ecosystem.

In September 2025, in response to feedback from community members and interested parties regarding its prior proposal that consisted of an application to CDFW for a scientific collecting permit (Fish & G. Code, §§ 1002, 1002.5, 1003; Cal. Code Regs., tit. 14, § 650), the Conservancy withdrew that permit application, redefined its restoration proposal and initiated the current Project proposal under a wholly separate regulatory regime pursuant to the Restoration Management Permit Act (Fish & G. Code, §§ 1670 et seq.). The Project, currently under consideration by South Coast Region for issuance of an RMP, includes changes in the methods of restoration efforts in response to public input and contains more robust restoration and revegetation components. The attached Workplan was developed by the Conservancy to operationalize the HRMP as part of the Project along with including the monitoring of sensitive species such as the Santa Catalina Island shrew

and Catalina mountain-mahogany (*Cercocarpus traskiae*), listed as endangered under the ESA and CESA; monitoring birds and lepidoptera (moths and butterflies); and more extensive vegetation monitoring.

Since October 2025, the Conservancy has made the RMP Application Package available to the public on its website (https://catalinaconservancy.org/protect/), and has made new versions of each document available as they are updated.

On October 14, November 12, and December 9, 2025, the Conservancy advertised and hosted community conversations in Avalon for community members and interested parties to discuss the Project. In each meeting, the Conservancy received public comment, which the Conservancy used to refine the Project.

4. REQUIRED DETERMINATIONS

Using substantial evidence and best available science, provide a determination and explanation for each SERP criteria listed below:

A. The Project is exclusively one or both of the following: (1) a project to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, or (2) a project to restore or provide habitat for California native fish and wildlife.

South Coast Region has determined that the Project is exclusively both a project to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, and a project to restore or provide habitat for California native fish and wildlife.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

South Coast Region's determination is based on the information provided by the Conservancy in the attached RMP Application Package. The Project has the exclusive purpose to conserve and enhance the native flora unique to Catalina and contribute to increased biodiverse native wildlife populations through decreased pressure and occurrence of invasive and non-native species. For example, the recovery efforts for the native Catalina Island mountain-mahogany will be dramatically increased through removal of non-native invasive species and targeted propagation efforts. The Project is expected to create higher quality habitat across Catalina resulting in increased opportunities for native wildlife species—including the Catalina Island fox, Catalina Hutton's vireo (*Vireo huttoni unitti*), Catalina California quail (*Callipepla californica catalinensis*), the three endemic bee species on Catalina, and six endemic land snail species—to seek refuge, breed, and forage.

B. An eligible project may have incidental public benefits, such as public access and recreation.

South Coast Region has determined that the Project may have incidental public benefits, including increased public access and recreation, improvement of safety and utilities, as well as increased public safety from the reduction of wildfire risk.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

South Coast Region's determination is based on the information provided by the Conservancy in the attached RMP Application Package. The Conservancy expects the Project to enhance public access and recreation by removing obtrusive exclosure fencing and cages currently located across Catalina to protect sensitive native plants from invasive mule deer browsing (HRMP section 1.3.7). The Conservancy also expects the Project will promote plant and wildlife viewing opportunities for the public. Incidental benefits to improve safety and utilities to residents and tourists are anticipated to include increased groundwater replenishment, benefiting Avalon's freshwater supply. The Conservancy also expects the Project will enhance recreational opportunities by providing more biodiversity for public viewing, more shade on the landscape, and enhanced opportunities for birding. The Conservancy also expects the Project will reduce risk of fire ignition through the replacement of highly combustible invasive annual grasslands with native perennial species (HRMP sections 1.3.5, 1.3.6).

C. The Project does both of the following: (1) Results in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and (2) Includes procedures and ongoing management for the protection of the environment.

South Coast Region has determined that the Project does both of the following: (1) Results in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and (2) Includes procedures and ongoing management for the protection of the environment.

For each criterion below, please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

Long-Term Net Benefits to Climate Resiliency:

South Coast Region's determination is based on the information provided by the Conservancy in the attached RMP Application Package. The Project is expected to contribute to long-term climate resiliency through several strategies. By supporting revegetation across Catalina through plant and invasive mule deer removal, extensive reseeding, and outplanting native species, the Project will bolster carbon sequestration (HRMP section 1.2.1). South Coast Region expects this will occur through the transition of invasive annual grasslands back to coastal sage scrub and island chaparral (Caspi et al. 2019). South Coast Region also expects that revegetation with perennial plants, specifically chapparal, will increase levels of carbon dioxide absorbed by plants and stored in the soil, helping to reduce atmospheric carbon levels and mitigate climate change (Luo et al. 2007).

The Project is expected to help improve soil stability and water capture on Catalina (HRMP section 1.2.1). Increased native vegetation cover across Catalina with perennial plants and their more extensive root systems will help prevent soil erosion, landslides, and other land degradation processes, ensuring the land's long-term health and productivity. By increasing soil stability and vegetation cover, the Project will also enhance the ability of Catalina to capture and retain water, which otherwise runs off or is evaporated if not permeated into the soil or absorbed by roots. Improved water capture will support the health of plant and animal species on Catalina and increase the ecosystem's resilience in the face of potential droughts and rising temperatures due to climate change.

The Project's contribution to climate resiliency also includes the protection of vital mesic habitats on Catalina, often found in canyons and slopes with north aspects that allow them to serve as solar refugia (HRMP section 2.1.2). These habitats, which are characterized by a balanced moisture supply throughout the growing season due to the collection of fog on larger plants that then falls to the soil, are critical for numerous species native to the Southern California region as they provide more moderate, dependable conditions for plants and animals compared to other areas that may receive moisture for only short periods of the year. With changing climate conditions leading to potential range contractions for many species, protection and enhancement of these mesic habitats will provide essential refugia for these organisms, ensuring their continued survival.

By restoring areas with native vegetation and replacing the quick drying flashy fuels of invasive grasses with slower-to-dry native shrubs, the Project may create a more fire-resilient landscape and reduce the risk of wildfire ignition. The Project will address habitats type-converted to invasive grasslands on Catalina (HRMP Appendix C). These are areas where invasive mule deer have left a legacy of disturbance and more competitive non-native grasses have outcompeted and replaced native plant communities, often leading to reduced biodiversity and increased fire risk. As conditions continue to become hotter and drier, improving the resiliency of these landscapes is crucial.

Long-Term Net Benefits to Biodiversity:

South Coast Region's determination is based on the information provided by the Conservancy in the attached RMP Application Package. The Project is expected to both enhance and preserve the unique flora found only on Catalina and contribute to more biodiverse wildlife populations, many of which are unique to Catalina. The Project is expected to increase biodiversity through the removal of invasive vegetation that limit native species' succession. Native plant communities will be established, including seeding and outplanting of more than 50 endemic plant species that will serve as habitat for native wildlife. A diverse range of native species will lead to natural succession patterns comprised of early and late succession species established in preferred microclimates (HRMP section 4.5.1). By creating a more diverse and robust network of habitats, the Project is expected to support a wider range of species, thereby promoting overall biodiversity on Catalina. For example, the Catalina Hutton's vireo depends on the endemic island scrub oak (*Quercus pacifica*) for habitat, which is currently not surviving to reproductive maturity due in part to the impacts of invasive species, including invasive mule deer.

The Project is expected to provide significant long-term net benefits to biodiversity on Catalina. One of the primary focuses of the Project is the mitigation of the negative impact caused by the invasive mule deer population on Catalina (HRMP sections 1.3.3, 2.1.6, 2.1.7, 2.2.1). By removing this negative impact, the Project is expected to foster significant revegetation, particularly of endemic and rare species that are currently underrepresented on Catalina due to the invasive mule deer preferentially browsing on these species that have lost their defenses to browsing pressure. Populations of endemic species are critically low: the populations of Santa Catalina Island ironwood (*Lyonothamnus floribundus floribundus*) and Catalina Island mountain-mahogany have fallen to 119 and 6 individuals remaining, respectively. The Project will address these threats to the genetic diversity of each population.

The Project's biodiversity enhancement strategy also addresses invasive plant species (HRMP Appendix A). Invasive plants often outcompete native plants for resources, which can lead to a reduction in species diversity in the immediate area and habitat diversity across Catalina. There has been a documented reduction in the diversity of habitats on Catalina, in particular coastal sage scrub and island chapparal in favor of invasive grasslands due to grazing and browsing pressure (Longcore et al. 2018). Through focused efforts to control and reduce the proliferation of invasive species followed by reseeding and outplanting with native species, the Project is expected to help to restore more biodiverse plant communities and allow for their natural expansion.

Catalina's flora includes more than 60 species with California Rare Plant Ranking status, three species listed as endangered under the ESA (Catalina Island mountain-mahogany, Lyon's pentachaeta (*Pentacheta lyonii*), and Santa Cruz Island winged-rockcress (*Sibara filifolia*)); one species listed as threatened under the ESA (island rush-rose (*Crocanthemum greenei*)); and two species listed as endangered under CESA (Catalina Island mountain-mahogany and Lyon's pentachaeta).

Long-Term Net Benefits to Sensitive Species Recovery:

South Coast Region's determination is based on the information provided by the Conservancy in the attached RMP Application Package. The Project is expected to provide substantial long-term net benefits to the recovery of sensitive species on Catalina (HRMP section 2.4). In particular, the Project is expected to expand breeding, foraging, and refuge habitat for native wildlife species (HRMP section 1.5), such as the Santa Catalina Island fox, Catalina Hutton's vireo, two-striped garter snake (*Thamnophis hammondii*), Catalina California quail, and the Santa Catalina Island shrew, each of which are designated as Species of Greatest Conservation Need by the 2015 CDFW State Wildlife Action Plan (2015 SWAP). In particular, the Catalina Hutton's vireo is expected to benefit due to its use of oak woodland habitat, which has had its natural regeneration impeded by diminished seed banks and continued targeted browsing from invasive mule deer.

The Project is expected to also aid in the recovery of sensitive plant species (HRMP section 2.5), including Channel Islands California lilac (*Ceanothus arboreus*), Catalina Island mountain-mahogany, island rush-rose (*Crocanthemum greenei*), listed as threatened under ESA, Catalina grass (*Poa thomasii*), southern island mallow (*Lavatera assurgentiflora glabra*), Santa Catalina Island ironwood, Santa Catalina Island bushmallow (*Malacothamnus fasciculatus catalinensis*), Lyon's pentachaeta, the Federally endangered Santa Cruz Island winged-rockcress, and Catalina nightshade (*Solanum wallacei*). Many of these species are recognized by the California Native Plant Society with Rare Plant Rankings and are identified as Species of Greatest Conservation Need by CDFW's 2015 SWAP. The plant species endemic to Catalina or the Channel Islands are expected to experience the most significant recovery due to their relative lack of physical and chemical defenses to herbivory from invasive browsers, such as invasive mule deer.

Procedures for the Protection of the Environment:

The Project includes procedures for the protection of the environment, including, but not limited to, biological monitoring, worker environmental awareness training, pre-project nesting bird surveys, herbicide use restrictions, proper collection and propagation of seeds, non-permanent fencing and signage, procedures to limit the spread of invasive species, and adherence to guidelines for the depopulation of animals set out by the American Veterinary Medical Association (Workplan section 3.5). Further details on the procedures for protection of the environment can be found in section 5 of the HRMP and the Workplan.

The Project includes procedures for the protection of the environment in each of its stages. The Project will include monitoring and vaccination of the Catalina Island fox (Workplan section 3.2), trapping of Santa Catalina Island shrew for monitoring purposes (Workplan section 4.7), collection and propagation of seeds (Workplan sections 2.4, 2.5; HRMP sections 4.5, 4.10), and the take of invasive mule deer to prevent further ecological damage (HRMP section 4.2; Workplan section 3.5). Ethical considerations and animal welfare will be a priority during all phases of the Project. Regarding invasive mule deer removal, the Project will follow the specifications by the American Veterinary Medical Association Guidelines for the Depopulation of Animals (Workplan section 3.5).

The Project will minimize any impacts on the surrounding natural environment during all operations, including monitoring sites for sensitive species before application of herbicide to combat invasive species, avoiding seeding during nesting bird season, use of non-lead ammunition for invasive mule deer removal, and retaining carcasses on the landscape (HRMP section 4.2; Workplan section 3.5). Carcasses will be removed from areas that are frequently used by people (for example, in or near Avalon or other inhabited areas or near trails/paths/roads).

For seed production and management, protection measures include obtaining all relevant approvals to collect and handle protected species. During wild seed collection, best practices will be followed including collecting at appropriate times for each species and collecting a maximum 5-10% of individual plants' seed production and collecting from a maximum of 5-10% of individuals in a population (HRMP section 4.5). Steps will be taken to ensure seed is collected from a variety of plants in a population to capture genetic diversity. The genetic integrity of plant populations will be secured through the bulk production of seed for restoration efforts from Catalina populations, and potentially from other Channel Island populations. If necessary, seeds will be bulked at the seed farm and processing facility on Catalina, which will prevent the genetics of mainland populations from swamping or outcompeting the unique genetics of Catalina populations. If proper biosecurity measures are in place, bulking will also take place off-island.

For invasive plant management both in wildlands and in the seed farm production area, the Project will adhere to all California Department of Pesticide Regulation rules and regulations for storage, mixing, and application of pesticides. Pesticides will be applied only by individuals appropriately licensed, certified, or trained, and in the lowest concentration and quantity necessary to achieve management objectives consistent with the pesticide product label (HRMP section 4.8). When appropriate and viable, mechanical removal methods will be utilized to minimize pesticide use. Biomass will be removed from the landscape if it poses a fire risk and disposed of appropriately. If biomass is left behind, management will occur prior to seed set to reduce the spread of invasive seeds. Timing of invasive removals will be determined by the phenology of each species, often targeting a plant prior to producing seed to reduce the seed bank and avoid accidental spread of the seed.

At restoration sites, precautions will be used to prevent soil erosion (HRMP section 4.7), particularly at steep locations. The use of jute cloth and wattles will help secure loose soil and stabilize slopes, thereby preventing soil loss and facilitating successful revegetation. Care will be taken to sterilize soil for plants intended for outplanting at restoration sites to reduce the risk of spreading pathogens. Container plants will be weeded prior to planting at restoration sites as well. Outplanting and seeding will be completed in the fall and winter seasons when conditions are cooler and wetter to promote higher survival and germination rates. All specific protocols are included in the attached HRMP.

Ongoing Management for the Protection of the Environment:

The Project includes plans for ongoing management for the protection of the environment through several strategies, including an adaptive management approach, a long-term monitoring plan for plant and wildlife populations, and conducting watering and survival studies at outplanting sites. The Project will utilize an adaptive management approach by reassessing and adjusting restoration strategies based on changing conditions and emerging data collected through the Long-term Monitoring Plan (HRMP section 5.4; Workplan section 4). The Long-term Monitoring Plan includes regular monitoring of plant and wildlife populations to track trends and determine if further interventions are necessary. To enable regular and detailed monitoring, biodiversity monitoring stations and vegetation transects will be established across Catalina. These stations will serve as data collection points, recording information on the health of the ecosystem, including the diversity and abundance of plant and animal species as well as abiotic conditions. This data will provide insight into the success of the restoration efforts and guide future decision-making.

An important aspect of the ongoing management is the study of outplanting success. Regular field assessments will monitor the survival and growth of outplanted individuals and populations. These checks will help identify any challenges to successful establishment, such as pests, diseases, or environmental stressors. The amount of water used to support outplantings will also be monitored to ensure water resources are utilized efficiently and effectively based on plant species, community, and location.

Continued invasive plant species management is also expected to protect the environment. The existing CIPP will be continued as a component of the Project to manage and control the spread of invasive species. An additional component will be monitoring for invasive plant species that were suppressed by the presence of other invasive plant species and/or invasive mule deer and adapting management strategies to address any potential new threats.

D. The Project does not include any construction activities, except for construction activities solely related to habitat restoration.

The South Coast Region has determined that the Project does not include any construction activities, except for construction activities solely related to habitat restoration.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

South Coast Region's determination is based on the information provided by the Conservancy in the attached RMP Application Package. The only potential construction included in the Project is the establishment of non-permanent exclosure fencing to protect active revegetation sites, the sole purpose of which is for habitat restoration. CDFW considers such exclosure fencing an established habitat restoration technique and not construction.

5. CERTIFICATION

I certify that I have the authority to determine whether a project is exempt pursuant to CEQA Guidelines section 15025(a)(1), and this Project meets all the requirements described in Public Resources Code section 21080.56, and that I have submitted all the determinations required therein necessary to obtain the concurrence of the Director of Fish and Wildlife.

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DocuSigned by:
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Date: 1/12/2026

Lead Agency Signature

Erinn Wilson-Olgin, Regional Manager

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Attachment 2

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CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
ECOSYSTEM CONSERVATION DIVISION
POST OFFICE BOX 944209
SACRAMENTO, CA 94244-2090

CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY EXEMPTION FOR RESTORATION PROJECTS
CONCURRENCE NO. 21080.56-2026-090-R5

Project:	Catalina Island Restoration Project
Location:	Los Angeles County
Lead Agency:	California Department of Fish and Wildlife, South Coast Region
Lead Agency Contact:	Erinn Wilson-Olgin; catalinarestoration@wildlife.ca.gov

Background

The ecosystem of Santa Catalina Island (Catalina Island) has been and continues to be impacted by invasive nonnative species, including nonnative mule deer (*Odocoileus hemionus*) and nonnative plants. Mule deer are native to most of mainland California but were historically absent from the Channel Islands. Mule deer were intentionally introduced to Catalina Island beginning in the 1920s. Because the native plant communities of Catalina Island developed without mule deer browsing and grazing pressure, native plant populations, including rare plant species endemic to Catalina Island, have experienced significant declines. Over time, mule deer browsing has reduced native vegetation composition and cover, while also spreading invasive nonnative plant species that generally outcompete native plant communities. Decades of mule deer browsing and grazing pressure across Catalina Island have contributed to large-scale habitat type conversion. For example, island chaparral communities have been replaced by nonnative annual grasslands and vegetation composition has shifted toward species that are less palatable to mule deer. These challenges have resulted in decreased native plant and wildlife biodiversity, extirpation of certain native species, and diminished climate resiliency. The reduction of native vegetation cover has also led to increased soil erosion, decreased water infiltration, and reduced wildlife habitat quality.

Project Location: The Catalina Island Restoration Project (Project) is located on Catalina Island, which is approximately 34 kilometers (km) south of the City of Long Beach. The majority of Project-related activities will occur on land owned and managed by the Santa Catalina Island Conservancy (Conservancy), a 501(c)(3) nonprofit organization. The Conservancy owns and manages roughly 88 percent (171 km^2) of Catalina Island. The Project is centered approximately at 33.382117, -118.433406.

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Project Description:

The Conservancy proposes to restore the ecological integrity and improve the climate resiliency of Catalina Island by protecting and enhancing the biodiversity of native plants and wildlife habitats through active restoration, including invasive species control, application of biosecurity measures, biological monitoring, resource protection, and documentation. The Conservancy's planned active restoration activities include measures such as invasive plant control and management (mechanical and chemical removal); collecting, bulking, and reseeding with native plants; and non-permanent fence building. Biosecurity measures include implementation of a comprehensive invasive plant program; annual Santa Catalina Island fox (*Urocyon littoralis catalinae*) monitoring, including infectious disease surveillance and prevention; and the removal of mule deer. Monitoring and documentation measures include annual Santa Catalina Island fox reporting; monitoring active restoration locations; lepidoptera (butterflies and moths), bird, shrew, small mammal, and herpetofauna (reptiles and amphibians) surveys; and landscape level vegetation monitoring.

Project activities include, but are not limited to, propagation of native seed, including germination trials, viability testing; and the production of rare and endangered plants of special concern using micropropagation, cuttings, hydroponics, aeroponics, and air layering. Restoration actions include initial dethatching of accumulated nonnative invasive thatch and litter; seed collection, bulking (on and off-island), cleaning, and storage; propagation of container plants from seed and cuttings for outplanting on the landscape; sourcing plants from conservation collections and storage of Channel Islands and Catalina Island endemic plant species. Potential seed application methods include, but are not limited to, sowing by hand, broadcasting by hand or with seed spreaders, seed ball broadcasting, mechanical broadcast seeding with devices such as a push or motorized broadcast spreader, drill seeding manually or with a mechanized drill seeder, hydroseeding, imprint seeding, and remedial seeding. Selection of an appropriate technique for a site will be based primarily on conditions and accessibility.

Biosecurity measures focus on the prevention of introduction and spread of nonnative species that threaten the Catalina Island ecosystem. The Catalina Invasive Plant Program (CIPP) prioritizes management of high-risk invasive plant species to mitigate their impact on the landscape and eradicate when feasible. Biosecurity measures will also include monitoring and vaccination of Santa Catalina Island fox to maintain or increase the population and help inform management activities that are supporting the population. Removal of mule deer is critical to the success of the Project to support the impacted native and endemic species on Catalina Island. Mule deer will be removed and/or managed through sterilization, aerial/ground net capture, aerial/ground monitoring, aerial/ground transportation, detection dogs, ground shooting during the day and night, collaring, shooting from a ground vehicle, baiting, thermal detection, and euthanasia.

The Conservancy has developed a long-term monitoring plan with the primary goal of measuring the biodiversity of plant and wildlife species across Catalina Island both before and after restoration activities. Monitoring includes lepidoptera capture and biodiversity analysis, population estimates of the Santa Catalina Island fox, Santa Catalina shrew (*Sorex ornatus willetti*) surveys, herpetofauna surveys, analysis of active restoration sites, 60 long-

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term vegetation monitoring plots, monitoring of all native small mammals, and visual/audio bird monitoring.

The Project is fully described in the Restoration Management Permit application package that the Conservancy submitted to the California Department of Fish and Wildlife (CDFW), South Coast Region (Lead Agency), which included the following documents: Restoration Management Permit application, Catalina Island Restoration Project 10-Year Workplan, Island Restoration Scientific Assessment, and Habitat Restoration and Monitoring Plan.

Tribal Engagement: The Lead Agency conducted outreach to ten Tribes after obtaining a list of relevant Tribal contacts from the Native American Heritage Commission. The Lead Agency sent tribal outreach letters on October 17, 2025, to the Gabrieleño Band of Mission Indians – Kizh Nation, Gabrielino-Tongva Indians of California Tribal Council, Gabrielino Shoshone Nation of Southern California, Gabrielino/Tongva Nation of the Greater Los Angeles Basin, Gabrielino-Tongva Tribe, Juaneño Band of Mission Indians-Achjachemen Nation, Pechanga Band of Luiseño Indians, Rincon Band of Luiseño Indians, San Gabriel Band of Mission Indians, and the Santa Ynez Band of Chumash Indians. Each letter offered an opportunity for the Lead Agency to facilitate conversations to better understand tribal perspectives. The Lead Agency has affirmed its commitment to continuing coordinating with any tribal governments that wish to engage with the Project.

In addition, the Conservancy has also conducted outreach with representatives of the Gabrielino Tongva Indians of California Tribal Council, Gabrielino Shoshone Nation of Southern California, San Gabriel Band of Mission Indians, and Gabrielino-Tongva Tribe. This outreach included hosting site visits to Catalina Island in Spring 2023, 2024, and 2025 to discuss island restoration and other opportunities to collaborate.

Interested Party Coordination: The Conservancy began outreach in 2022 and 2023 to receive feedback and input from interested parties, which included 70 community leaders in the City of Avalon. The Conservancy also hosted two advisory council meetings in June and July 2023, which included invitees representing local politicians, business leaders, and interested community members. In 2025 the Conservancy presented Project-related details at an Avalon City Council meeting and a Fish and Game Commission meeting. Also in 2025, the Conservancy hosted five Community Forums on Catalina Island, two Catalina Speaker Series, and community conversations in Avalon for community members and interested parties to discuss the Project: the Conservancy received public comments in each of these Conservancy-hosted meetings.

The Lead Agency maintains an email address to receive public comments regarding the Project and has received and considered several hundred email comments. Additionally, the Conservancy also maintains a webpage with details and documents related to the Project.

Anticipated Project Implementation Timeframes: Start date: January 2026
Completion date: January 2036

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Lead Agency Request for CDFW Concurrence: On January 12, 2026, CDFW received a concurrence request from the Lead Agency pursuant to Public Resources Code section 21080.56, subdivision (e) (Request). The Request seeks CDFW concurrence with the Lead Agency's determination on January 12, 2026, that the Project meets certain qualifying criteria set forth in subdivisions (a) to (d), inclusive, of the same section of the Public Resources Code (Lead Agency Determination). CDFW concurrence is required for the Lead Agency to approve the Project relying on this section of the California Environmental Quality Act (CEQA). (Pub. Resources Code, § 21000 et seq.).

Concurrence Determination

CDFW concurs with the Lead Agency Determination that the Project meets the qualifying criteria set forth in Public Resources Code section 21080.56, subdivisions (a) to (d), inclusive (Concurrence).

Specifically, CDFW concurs with the Lead Agency that the Project meets all of the following conditions: (A) the Project is exclusively to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or is exclusively to restore or provide habitat for California native fish and wildlife; (B) the Project may have public benefits incidental to the Project's fundamental purpose; (C) the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and includes procedures and ongoing management for the protection of the environment; and (D) Project construction activities are solely related to habitat restoration. Pursuant to Public Resources Code section 21080.56, subdivision (g), CDFW will post this Concurrence on its CEQA Notices and Documents internet page: https://wildlife.ca.gov/Notices/CEQA.

This Concurrence is based on best available science and supported, as described below, by substantial evidence in CDFW's administrative record of proceedings for the Project.

This Concurrence is also based on a finding that the Project is consistent with and that its implementation will further CDFW's mandate as California's trustee agency for fish and wildlife, including the responsibility to hold and manage these resources in trust for all the people of California.

Discussion

A. Pursuant to Public Resources Code section 21080.56, subdivision (a), CDFW concurs with the Lead Agency that the Project will exclusively conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or restore or provide habitat for California native fish and wildlife.

   The exclusive purpose of the Project is to conserve and enhance the native flora unique to Catalina Island and contribute to increased biodiverse native wildlife populations through decreased pressure and occurrence of invasive and nonnative species. The removal of invasive and nonnative species as well as the Project's native

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revegetation and monitoring efforts are expected to enhance habitat across Catalina Island, resulting in increased opportunities and recovery of native and sensitive wildlife and plant species, including endemic vertebrates such as Santa Catalina Island fox, Catalina Hutton's vireo (*Vireo huttoni unitti*), Catalina California quail *(Callipepla californica catalinensis)*; and invertebrates such as three endemic bee species, and six endemic land snail species, including Santa Catalina lancetooth (*Haplotrema duranti*).

B. Pursuant to Public Resources Code section 21080.56, subdivision (b), CDFW concurs with the Lead Agency that the Project may have incidental public benefits, such as public access and recreation.

   The Conservancy expects the Project to enhance public access and recreation by removing obtrusive exclosure fencing and cages currently located across Catalina Island to protect sensitive native plants from mule deer. The Conservancy also expects the Project will promote plant and wildlife viewing opportunities for the public. Incidental benefits to improve safety and utilities to residents and tourists are anticipated to include increased groundwater replenishment, benefiting Avalon's freshwater supply. The Conservancy also expects the Project will enhance recreational opportunities by providing more biodiversity for public viewing, increased landscape shading, and enhanced opportunities for birding. The Conservancy anticipates that the Project will reduce risk of fire ignition through the replacement of highly combustible invasive annual grasslands with native perennial species. All potential non-restoration benefits would be incidental to the purpose of the Project, which is to conserve and enhance the native flora unique to Catalina Island and contribute to increased biodiverse native wildlife populations through decreased pressure and occurrence of invasive and nonnative species

C. Pursuant to Public Resources Code section 21080.56, subdivision (c), CDFW concurs with the Lead Agency that the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery, and includes procedures and ongoing management for the protection of the environment.

   Long-term Net Benefits to Climate Resiliency: The Project is expected to increase carbon sequestration via revegetation with perennial native plants, such as chaparral species, which is expected to increase the level of carbon dioxide absorbed and stored in the soil. The Project's revegetation measures are also expected to improve soil stability and water capture by increasing native vegetation cover with perennial native plants. Catalina Island's native perennial plants have extensive root systems, which will help reduce the risk of soil erosion, landslides, and other land degradation processes, contributing to long-term vegetation health and productivity. In addition, revegetation is expected to increase water capture and retention through increased soil stability and native vegetation cover. As increased drought and rising temperatures are expected as a result of climate change, improved water capture would support the health of plant and animal species and increase climate resiliency. Through restoring these areas with native vegetation and replacing the quick-drying flashy fuels of nonnative annual grasses with slower-to-dry native shrubs, the Conservancy expects the Project to create a more fire-resilient landscape.

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Project activities also include the protection of vital mesic habitats on Catalina Island, often found in canyons and slopes with north aspects that allow them to serve as solar refugia. These habitats, which are characterized by a balanced moisture supply throughout the growing season due to the collection of fog on larger plants that then falls to the soil, are critical for numerous native species as they provide more moderate conditions for plants and animals. With changing climate conditions leading to potential range contractions for many species, protection and enhancement of these mesic habitats will provide essential refugia for these organisms, ensuring their continued survival.

Long-term Net Benefits to Biodiversity: Through focused efforts to control and reduce the proliferation of invasive vegetation species followed by reseeding and outplanting with native species, the Project is expected to help restore more biodiverse plant communities and allow for their natural expansion. As a result, the Project is expected to both enhance and preserve the unique flora and in the long-term contribute to more biodiverse wildlife populations on Catalina Island. Native plant communities will be established through seeding and outplanting of more than 50 endemic plant species that will serve as habitat for native wildlife. Revegetation is expected to result in a diverse range of native species that will lead to natural succession patterns composed of early and late succession species established in their historical preferred microclimates.

Additionally, the Project's native revegetation measures will be further supported by removing the negative impacts of over-browsing by nonnative mule deer, particularly of endemic and rare plant species that are currently underrepresented due to observed preferential deer browsing patterns. As a result of these browsing patterns, many populations of endemic species are critically low. For example, populations of Santa Catalina Island ironwood (*Lyonothamnus floribundus ssp. floribundus*) and Catalina Island mountain-mahogany (*Cercocarpus traskiae*) have fallen to 119 and 6 individuals remaining, respectively. The Project will address these threats to the genetic diversity of each population, which is expected to result in long-term net benefits to biodiversity throughout the Project area.

Long-term Net Benefits to Sensitive Species Recovery: The Project is expected to provide substantial long-term net benefits to the recovery of sensitive species on Catalina Island. Project activities are expected to assist in the expansion of breeding, foraging, and refuge habitat for native wildlife species, such as Santa Catalina Island fox, listed as endangered under both the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA)[1]; Catalina Hutton's vireo; two-striped gartersnake (*Thamnophis gigas*); Catalina Island California quail, designated as a Species of Greatest Conservation Need in the 2015 CDFW State Wildlife Action Plan (2015 SWAP) and the California State Wildlife Action Plan, 2025 Update: A Conservation Legacy for Californians (2025 SWAP); and the Santa Catalina shrew,

[1] Only one of the six subspecies of Island fox, the Santa Catalina Island fox (*Urocyon littoralis catalinae*), is listed (as threatened) under the federal Endangered Species Act. The CESA listing for Island fox (*Urocyon littoralis*) includes all six subspecies of Island fox.

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also designated as a Species of Greatest Conservation Need in the 2015 SWAP and the 2025 SWAP. All these species will benefit from increased quality habitat from Project activities.

The Project is also expected to contribute to the recovery of sensitive plant species, including Channel Islands California lilac (*Ceanothus arboreus*); Catalina Island mountain-mahogany, listed as endangered under both the federal ESA and CESA; island rush-rose (*Crocanthemum greenei*), listed as threatened under the federal ESA; Catalina grass (*Poa thomasii*); southern island mallow (*Lavatera assurgentiflora ssp. glabra*); Santa Catalina Island ironwood; Santa Catalina Island bushmallow (*Malacothamnus fasciculatus var. catalinensis*); Lyon's pentachaeta (*Pentachaeta lyonii*), listed as endangered under both the federal ESA and CESA; Santa Cruz Island rockcress (*Sibara filifolia*), listed as endangered under federal ESA; and Catalina nightshade (*Solanum wallacei*). Island endemic plant species are expected to experience significant recovery due to their relative lack of physical and chemical defenses to herbivory from invasive browsers.

Procedures for the Protection of the Environment: The Project includes procedures for the protection of the environment, including, but not limited to, biological monitoring, worker environmental awareness training, pre-project nesting bird surveys, herbicide use restrictions, proper collection and propagation of seeds, temporary fencing and signage, and procedures to limit the spread of invasive species.

The Project will minimize impacts to the surrounding natural environment during all operations, including monitoring sites for sensitive species before application of herbicide to combat invasive species, avoiding seeding during nesting bird season, and use of non-lead ammunition for shooting mule deer.

For nonnative plant management both in wildlands and in the seed farm production area, the Project will adhere to all California Department of Pesticide Regulation rules and regulations for storage, mixing, and application of pesticides. Pesticides will be applied only by individuals appropriately licensed, certified, or trained, and in the lowest concentration and quantity necessary to achieve management objectives consistent with the pesticide product label. When appropriate and viable, mechanical removal methods will be utilized to minimize pesticide use. Timing of invasive species removals will be determined by the phenology of each species, often targeting a plant prior to producing seed to reduce the seed bank and avoid accidental spread of the seed.

At restoration sites, precautions will be used to prevent soil erosion, particularly at steep locations. The use of jute cloth and wattles will help secure loose soil and stabilize slopes, thereby preventing soil loss and facilitating successful revegetation.

Ongoing Management for the Protection of the Environment: The Project includes plans for ongoing management for the protection of the environment through an adaptive management approach, long-term monitoring plan for plant and wildlife populations, and conducting watering and survival studies at outplanting sites. The

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Project will utilize an adaptive management approach by reassessing and adjusting restoration strategies based on changing conditions and emerging data collected through the Project's Long-term Monitoring Plan (LTMP). The LTMP includes regular monitoring of plant and wildlife populations to track trends and determine if further interventions are necessary. To enable regular and detailed monitoring, biodiversity monitoring stations and vegetation transects will be established across Catalina Island to collect information on the health of the ecosystem, including the diversity and abundance of plant and animal species as well as abiotic conditions. This data will provide insight into the success of the restoration efforts and guide future decision-making.

Regular field assessments will monitor the survival and growth of outplanted individual plants and plant populations. These checks will help identify any challenges to successful establishment, such as pests, diseases, or environmental stressors. Continued invasive plant species management is also expected to protect the environment. The existing CIPP will be continued as a component of the Project to manage and control the spread of invasive species.

D. Pursuant to Public Resources Code section 21080.56, subdivision (d), CDFW concurs with the Lead Agency that the Project does not include any construction activities, except those solely related to habitat restoration.

   The Project will install non-permanent exclosure fencing to protect active revegetation sites, for the sole purpose of habitat restoration.

Scope and Reservation of Concurrence

This Concurrence is based on the proposed Project as described by the Lead Agency Determination and the Request. If there are any subsequent changes to the Project that affect or otherwise change the Lead Agency Determination, the Lead Agency, or any other public agency that proposes to carry out or approve the Project, shall submit a new lead agency determination and request for concurrence from CDFW pursuant to Public Resources Code section 21080.56. If any other public agency proposes to carry out or approve the Project subsequent to the effective date of this Concurrence, this Concurrence shall remain in effect and no separate concurrence from CDFW shall be required so long as the other public agency is carrying out or approving the Project as described by the Lead Agency Determination and the Request.

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Other Legal Obligations

The Project shall remain subject to all other applicable federal, state, and local laws and regulations, and this Concurrence shall not weaken or violate any applicable environmental or public health standards. (Pub. Resources Code, § 21080.56, subd. (f).)

CDFW Certification

By: DocuSigned by: Joshua Grover 703E59B6647A482... Date: 1/26/2026

Joshua Grover, Deputy Director
Ecosystem Conservation Division
California Department of Fish and Wildlife