

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
DIRECTOR'S OFFICE
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**CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY EXEMPTION FOR
RESTORATION PROJECTS
CONCURRENCE NO. 21080.56-2022-004-R5**

Project: Ormond Beach Initial Restoration Project
Location: Ventura County
Lead Agency: State Coastal Conservancy
Lead Agency Contact: Christopher Kroll, chris.kroll@scc.ca.gov

Background

Project Location: The Ormond Beach Initial Restoration Project (Project) is located within the City of Oxnard, in Ventura County, along a section of coast extending from Port Hueneme south to the northwestern boundary of the Point Mugu Naval Air Station. The approximate coordinates of the project are Longitude/Latitude 34.134793, -119.176491. The Project area is approximately a 334-acre portion of a larger 650-acre wetland property that includes land owned and managed by the State Coastal Conservancy (SCC), The Nature Conservancy (TNC), and the City of Oxnard, collectively known as the Project Partners.

Ormond Beach is actively enjoyed by the public. In 2015 over 22,500 visitors were documented visiting the area. In the early 1990s, SCC targeted Ormond Beach as a high priority area of biological significance and habitat restoration potential. Through a statewide planning process, Ormond Beach was identified as a conservation priority for southern California, and in 1999 a protection and restoration effort was initiated by TNC and SCC. To date, Ormond Beach consists of 650 acres of land. The City of Oxnard's Coastal Land Use Plan designates land use within Ormond Beach as "recreation," "resource protection," "visitor serving commercial," "energy facilities," and "industry priority to coastal dependent."

The Project will be implemented as the second phase of a larger five-phased restoration and public access project, known as the Ormond Beach restoration and Public Access Project (OBRAP). This Project has been awarded \$1,000,000 in US Fish and Wildlife Service grant funding to fully implement the second phase of OBRAP and includes \$416,670 in nonfederal match funding.

Project Description: The Project will involve removing nonnative/invasive plant species, removing trash, and monitoring water quality and pollution sources into Ormond Lagoon. In addition, habitat protection fencing will be installed and ~150 acres of nesting habitat for listed bird species will be monitored. Restoration focused public engagement activities will also be part of the Project.

A more in-depth description of the Project's activities include:

- *Invasive Plant Removal Planned Activities:* The project will include the control or eradication of the following invasive plant species:

Scientific Name	Common Name	Cal-IPC status ¹
<i>Acacia spp.</i>	acacia	Watch-Moderate
<i>Ammophila arenaria</i>	European beachgrass	High
<i>Arundo donax</i>	arundo	High
<i>Brassica nigra</i>	black mustard	Moderate
<i>Bromus diandrus</i>	ripgut brome	Moderate
<i>Carpobrotus edulis</i>	iceplant	High
<i>Centaurea stoebe ssp. micranthos</i>	spotted knapweed	High
<i>Conium maculatum</i>	poison hemlock	Moderate
<i>Cortaderia selloana</i>	pampas grass	High
<i>Foeniculum vulgare</i>	fennel	High
<i>Melilotus alba</i>	sweet clover	None; watchlist
<i>Mesembryanthemum crystallinum</i>	crystalline iceplant	Moderate
<i>Mesembryanthemum nodiflorum</i>	slenderleaf iceplant	None
<i>Myoporum laetum</i>	myoporum	Moderate
<i>Plecostachys serpyllifolia</i>	petite-licorice, cobweb bush	None; watchlist
<i>Symphotrichum subulatum var. elongatum</i>	Bahama aster	None
<i>Tamarisk ramosissima</i>	tamarisk	High
<i>Washingtonia robusta</i>	Mexican fan palm	Moderate

Techniques for removal and control will involve hand and mechanical removal, and herbicide treatment. Plant removal will primarily occur by hand or with hand tools. Some mechanized tools (chainsaw) may also be used for larger plants, outside of sensitive habitat areas. Herbicide treatment will be timed to avoid bird nesting season and periods of inundation. Foliar applications of an aquatic formulated herbicide (glyphosate) will be applied to target species where sensitive habitat can be avoided. Cut and daub application technique will be used where necessary to avoid impacts to sensitive species or habitats. Additionally, up to 10 Monterey cypress (*Cupressus macrocarpa*) may be trimmed to remove lower branches used for illegal camping and further reduce the cover of nonnative species.

- *Nesting Shorebird Protection Planned Activities:* Nest protection activities will include erection and management of permanent exclusion and symbolic fencing, signage or

¹ The California Invasive Plant Inventory categorizes non-native invasive plants that threaten native habitats. Plants are given rating of High, Moderate or Limited based on evaluation using the criteria system. See <https://www.cal-ipc.org/> for more information.

other necessary means, around sensitive nesting areas on ~150 acres of federally designated critical habitat for western snowy plover (*Charadrius nivosus nivosus*) at Ormond Beach. Habitat fences comprised of 7-foot T-posts will be installed with UV resistant mesh on posts placed at approximately 10 to 15-foot intervals. “Symbolic” fencing intended to serve as a visual deterrent to entry constructed of 4-foot wood posts will be placed up to 20 feet apart with a rope or string strung between the posts. Fence lines will be adjusted regularly to reflect fluctuating nesting patterns and beach topography. Fences will be placed to direct the public away from sensitive nesting and check rearing areas while maintaining existing access to the beach through designated access corridors. Annual fence maintenance to repair or replace broken mesh, replace corroded posts, unbury areas where dunes have encroached, or reposition exposed posts will be conducted. Signs will be posted on the fences to inform the public about the fencing purpose and the need to avoid shorebird nesting areas. In addition, a shorebird recovery program will monitor western snowy plover and California least tern (*Sternula antillarum browni*) nesting by monitoring adult populations, nesting outcomes and documenting threats to the plovers and least terns.

- *Trash Removal and Water Quality Monitoring:* Ongoing trash clean up events will occur in the project area through regular planned intervals. In addition, E. coli and Enterococcus levels in the Ormond Lagoon and Ormond Lagoon Waterway will be monitored. Water samples will be collected quarterly at three sites and over 100 samples will be taken at each sampling event. The plan is to conduct approximately 12 sampling events.
- *Public Engagement:* Focused on the enhancement and endurance of restoration efforts being undertaken in this Project, public outreach activities will include environmental education trainings related to the wetlands, managed clean-up events, and public workshops, surveys, focus groups, and field trips related to the restoration planning will also be conducted as part of the project. Up to six trainings for volunteers and/or schools, one annual training for law enforcement on nesting habitat protection and management and approximately 24 community-organized waterway and beach clean-ups will occur. And, finally, at least two public workshops will be planned to update the community on the restoration and the status of OBRAP. These public outreach activities are not expected to result in direct physical effects to the environment.

By implementing these activities, the Project will collectively eradicate and/or control nonnative plant species and provide habitat restoration to 334 acres of wetlands and uplands for California native wildlife, including western snowy plover and California least tern, at Ormond Beach.

Stakeholder Coordination: Over the past three years, the Project Partners have facilitated stakeholder outreach, including tribal consultation and community engagement through community workshops, door-to-door surveys, and public field trips. Additional feedback was provided by the OBRAP scientific advisory committee (SAC), which included representatives from federal and state wildlife agencies, nongovernment organizations, and university faculty. Through this outreach, the community has identified immediate needs for enhanced

stewardship, safer and more convenient access points, outreach to underserved low-income and diverse communities, site security, and habitat protection.

On March 1, 2022, the Project Partners met with local Tribal representatives from the Barbareno-Ventureno Band of Mission Indians, the Coastal Band of the Chumash Nation, and the Santa Ynez Band of Chumash Indians. In response, the Barbareno-Ventureno Band of Mission Indians indicated interest in engaging with the project partners and a site visit is currently being planned for Tribal members.

The Project includes a public engagement element to advance outreach and education about the restoration work that is planned to help indirectly supplement some of the restoration measures that will be implemented. These outreach activities are aimed to help interpret and create a long-lasting and an enduring understanding of the project by public stakeholders to assist in the recovery of California native fish and wildlife, and the habitat upon which they depend.

Project Implementation Timeframes: Start date: May 2022
Completion date: December 2025

Lead Agency Request for CDFW Concurrence: On March 24, 2022, the Director of the California Department of Fish and Wildlife (CDFW) received a concurrence request from the State Coastal Conservancy (Lead Agency) pursuant to Public Resources Code section 21080.56, subdivision (e). The request seeks the CDFW Director's concurrence with the Lead Agency's Determination on March 24, 2022, that the Project meets certain qualifying criteria set forth in subdivisions (a) to (d), inclusive, of the same section of the Public Resources Code. The CDFW Director's 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

The CDFW Director 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: (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 may have public benefits incidental to the Project's fundamental purpose; (3) 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 (4) 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>.

The CDFW Director’s 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.

The Director’s determination 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), the CDFW Director concurs with the Lead Agency that the Project is exclusively 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.

The Project will restore habitat by removing or controlling invasive and nonnative plant species that are competing with native vegetation and encroaching upon habitat for native plant species documented within or immediately adjacent to the project area, including the following special-status species:

Scientific Name	Common Name	CRPR ² , State/Federal Listing Status
<i>Abronia maritima</i>	red sand verbena	4.2, N/A
<i>Cordylanthus maritimus</i> <i>ssp. maritimus</i>	salt marsh bird’s beak	1B.2, State and Federally Endangered
<i>Juncus acutus</i> L. <i>ssp.</i> <i>leopoldii</i>	spiny rush	4.2
<i>Lasthenia glabrata</i> <i>ssp.</i> <i>Coulteri</i>	Coulter’s goldfields	1B.1
<i>Suaeda taxifolia</i>	woolly seablite	4.2

In the process, the intended outcome of the Project is to fully eradicate a collection of invasive plant species and prevent new invasions of emerging threats such as those posed by cobweb bush in salt marsh habitats. Some target invasive plant species for control include myoporum (*Myoporum laetum*) and Brazilian peppertree (*Schinus terebinthifolia*), which are associated with human-induced and frequent unnatural wildfires in wetland/upland habitats. Furthermore, removal of invasive plants will protect and restore native habitat areas for continued use by native wildlife and

² The California Rare Plant Ranks are a ranking system developed by the California Native Plant Society (CNPS) to better define and categorize rarity in California’s flora. The ranks are defined as follows: rank 1B.1 plants are considered rare, threatened, or endangered in California and elsewhere; seriously threatened in California. Rank 1B.2 plants are considered rare, threatened, or endangered in California and elsewhere; fairly threatened in California. Rank 4.2 plants are considered plants of limited distribution; fairly threatened in California. See <https://www.cnps.org/rare-plants/cnps-inventory-of-rare-plants> for more information.

special-status bird species, such as the western snowy plover and California least tern.

Habitat fencing and monitoring of nesting habitat will assist in the recovery of three species listed under the Endangered Species Act - western snowy plover, California least tern, and the light-footed Ridgway's rail (*Rallus obsoletus levipes*). Actions will focus on directly protecting nesting areas from beach goers, dogs, vehicles, nest predators and other threats, and providing training to local law enforcement and volunteer docents. These actions may also benefit additional special-status species, such as the fully protected California brown pelican (*Pelecanus occidentalis californicus*) and white-tailed kite (*Elanus leucurus*), and state endangered species Belding's savannah sparrow (*Passerculus sandwichensis beldingi*) by reducing disturbance adjacent to nesting and/or foraging habitat.

Removal of trash from waterways and quarterly water quality monitoring in the Ormond Lagoon and Ormond Lagoon Waterway will aid in the enhancement of native fish habitat, such as the tidewater goby (*Eucyclogobius newberryi*), and improve foraging habitat for California least tern and other threatened and common bird species. Water quality and trash source monitoring will help identify pollution sources in the wetlands complex which can reduce the health of the wetlands and adversely impact the health of native fish and wildlife using the wetlands. Monitoring will be coordinated with Ventura County Watershed Protection District to support data contributing to water quality improvement and pollution reduction.

- B. Pursuant to Public Resources Code section 21080.56, subdivision (b), the CDFW Director concurs with the Lead Agency that Project may have incidental public benefits.

The Lead Agency has determined that the Project's public outreach/engagement may be defined as an incidental public benefit. Although outreach/engagement is not a direct restoration activity, it is expected to help ensure protection and enduring enhancement of Ormond Beach through supplying educational program information, providing awareness detailing shorebird life histories and training staff/individuals to conduct public outreach and assistance in monitoring. This will increase the number of trained volunteers patrolling Ormond Beach, which will enhance public knowledge and interest in the federal and state-listed shorebirds, as well as reduce the threat of theft and vandalism of habitat fencing. Cumulatively, these outreach activities will increase the likelihood of successful implementation of the benefits of the Project and will foster community stewardship necessary for long-term conservation of the site. As a result, these incidental public benefit activities will be an important contributing factor for lasting success of the Project.

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

Long-term net benefits to climate resiliency: Restoration of coastal wetlands sequester carbon, while also reduce coastal erosion and protecting against storm surges, thus, reduce the risks from sea level rise and extreme weather (IPCC, 2022). The Project will aid in climate resiliency by restoring Ormond Beach's wetland habitat, allowing the likelihood of it acting as a natural buffer to sea level rise and providing better opportunity for plant and wildlife habitat to migrate inland in response to the changing conditions associated with climate change.

As sea levels rise, the beach and wetland habitats at Ormond Beach are expected to change due to increasing inundation and geomorphic migration inland. To minimize adverse habitat changes resulting from sea-level rise, future phases of OBRAP will incorporate Sea Level Affecting Marshes Modeling (SLAMM), as indicated in Ormond Beach Restoration and Public Access Project Plan, Preferred Alternative and Preliminary Design Plan. As part of utilizing SLAMM, habitat changes under future conditions through the year 2100 (4.8 ft of sea level rise) have been modeled for a preferred alternative. Based off this, the OBRAP design will take into consideration opportunities and constraints of sea-level rise and other inputs, such as existing infrastructure, adjacent land uses, flood potential, and protections for existing sensitive habitats and special-status species.

The wetlands complex at Ormond Beach is not confined by major infrastructure (e.g., highway, railroad) or other development (e.g., housing) and therefore has room for ecosystem/biome migration inland over the long-term as sea levels rise. The Project will restore habitat in an area that can accommodate habitat migration. By eliminating nonnative invasive plant species, the ecosystem functions and services provided by Ormond Beach will be protected and, in some areas, restored. Monitoring and retreatments at sites where exotic vegetation is removed will control invasive species and prevent new invasions. Consequently, the project will conserve potential future habitat and climate refugia; restore degraded habitat in areas likely to be climate change refugia or migration steppingstones and control invasive species and establish actions to prevent new invasions.

Long-term net benefits to biodiversity: The Project will prevent further expansion of invasive plants and eliminate source populations of emerging invasive plant threats, preserving habitat biodiversity. Avian biodiversity will be improved through protecting nesting and rearing habitat from nonnative predators and disturbance. Together, these activities will contribute to long term net benefits to biodiversity.

Despite decades of degradation, an impressive level of native biodiversity remains in the few areas of the project site that support intact estuarine intertidal emergent wetland, palustrine emergent wetland, marine intertidal wetland, and palustrine scrub-shrub. The project area is occupied by numerous special-status fish, wildlife, and plant species, provides designated critical habitat for three species listed under the Endangered Species Act (ESA) and is an important stopover along the Pacific Flyway migratory corridor for over 200 bird species.

The invasive plant eradication efforts are expected to have long term net benefits by preventing further expansion of invasive plants into intact habitat areas and by eliminating source populations of emerging invasive plant threats. Additionally, the eradication of invasive plants included in this project will have long-term benefits to the adjacent habitat areas at Naval Base Ventura County (NBVC) at Point Mugu. The emergent invasive species, cobweb bush, has become a management issue at NBVC where source populations disperse from Ormond Beach, invading habitat for salt marsh bird's beak and other rare coastal plant species. Invasive plant species targeted for control include non-native trees and shrubs that harbor illegal human encampments which impact several nesting bird species (shorebirds, ground nesting, wetland/riparian dependent) through frequent wildfire ignitions, trampling of nests, and attraction of nest predators such as corvids, cats, and dogs.

Direct protection and fencing of shorebird nesting habitat will conserve threatened avian diversity, specifically targeting western snowy plover and California least tern. Protecting habitat areas will also help enhance biodiversity net benefits to other ground nesting bird species, migratory birds, reptiles, small mammals, and invertebrates.

Removal of trash and reducing pollution will have benefits to water quality and consequently help restore habitat for fish, bird, mammals, amphibians, reptiles, and invertebrates within Ormond Beach.

Long-term net benefits to sensitive species: The Project will restore habitat of sensitive species by removing or controlling invasive and nonnative plant species that are competing with native vegetation and encroaching upon habitat for native plant species documented within or immediately adjacent to the project area, including special-status species. Furthermore, the project will protect and expand existing nesting and foraging wildlife habitats and improve the resiliency of habitats overall due to sea level rise. Collectively, these activities will contribute to preserving 5 observed special status plant species within the project, with the potential of 9 other plant species that the project will be able to host as suitable habitat. In addition, the project will enhance the habitat of and contribute to the ongoing protection of 5 special status wildlife species, with a high likelihood of being able to host at least 20 other wildlife species that are known to be present in the area. As a result, these actions will contribute to the long-term net benefit to sensitive species within Ormond Beach.

A total of 5 special-status plant species are known to occur within 1 mile of the project area. These include:

- Salt marsh bird's beak: Observed within several of the salt marsh habitats within the project area and to the southeast in the Ventura County Game Preserve (Aspen 2009) and throughout much of the salt marsh habitat on-site during surveys conducted by CRC and ESA in 2017. Additionally, this species was observed immediately southeast of the Project Area within the NBVC Point Mugu property on June 30, 2005.

- Coulter's goldfields: Observed within the southern coastal salt marsh on-site during previous surveys (Aspen 2009) and west of the terminus of McWane Blvd., within the project area, during surveys conducted by CRC and ESA in 2017. Additionally, this species was observed on March 8, 2002, in the same general location as in 2017 (CNDDDB 2017).
- Spiny rush: Observed within much of the wetland habitat within the project area during previous surveys (Aspen 2009) and during surveys conducted by CRC and ESA in 2017.
- Woolly seablite: Observed in much of the wetland habitat within the Project area (Aspen 2009).
- Red sand verbena: Observed throughout the southern foredune and transitional habitat within the Project Area during previous surveys (Aspen 2009).

Additionally, 9 documented special-status plant species were not observed within or immediately adjacent to the Project Area, but have a high potential to occur based on a presence of suitable habitat: southern tarplant (*Centromadia parryi* ssp. *australis*); orcutt's pincushion (*Chaenactis glabriuscula* var. *orcuttiana*); dune larkspur (*Delphinium parryi* spp. *blochmaniae*); beach spectaclepod (*Dithyrea maritima*); small spikerush (*Eleocharis parvula*); suffrutescent wallflower (*Erysimum insulare* spp. *suffrutescens*); vernal barley (*Hordeum intercedens*); California spineflower (*Mucronea californica*); and estuary seablite (*Suaeda esteroa*).

A total of 25 special-status wildlife species are known or are highly likely to occur within one mile of the Project Area. Of particular interest are 5 species (four birds, one fish) that occur at the site and are listed as a federally or state threatened or endangered species:

- Western snowy plover: Present year-round at Ormond Beach. Several nest and roost in the southern foredune habitat and forage along shoreline and open waters (Aspen 2009); this species was observed nesting and foraging within the saltmarsh habitat and foraging within the southern foredune habitat within the Project Area during surveys conducted by CRC and ESA in 2017. Additionally, this species was observed foraging in the southern foredune habitat on September 1, 2015 (CNDDDB 2017).
- California least tern: A small colony nest and roost in the southern foredune habitat at south Ormond Beach, using open water habitat for foraging (Aspen 2009); this species was observed foraging within flooded drainages on-site as well as regular fly-over during surveys conducted by CRC and ESA in 2017. Additionally, this species was observed within the Project Area in 1996; note in observation specified that the species has been documented breeding within the immediate vicinity since 1936 (CNDDDB 2017).
- Belding's savannah sparrow: Present in fragmented patches of saltmarsh habitat throughout the Project Area but concentrated primarily (1) between the Halaco properties and Ormond Beach Generating Station (OBGS), and (2) the saltmarsh in the southern portion of the Ventura County Game Preserve (Aspen 2009); this species was observed on-site during surveys conducted by CRC in 2017. Additionally, two breeding pairs were observed between the OBGS and

the NBVC Point Mugu fence line and 18 pairs were observed between the Edison and Halaco properties on May 23, 2006 (CNDDDB 2017).

- Light-footed Ridgway's rail: Ridgway's rail were not detected during field surveys in 2017. A single individual bird was detected in April 2016 and in 2013 during protocol surveys (Hall 2016). No birds were detected in follow-up surveys in May 2016.
- Tidewater goby: The brackish open waters in the northwest corner of the Project Area provide suitable habitat for this species. This species was documented in the Lagoon by USFWS, Ventura Office in 2006 (Aspen 2009) and by ESA in the Lagoon in April 2017. Additionally, this species was observed within the J Street Drain in March 2007, just northwest of the Project Area (CNDDDB 2017), and in November 2015 (USFWS 2013a).

Other documented special-status wildlife species that may have potential to use the project's area as suitable habitat (Aspen 2009) include: American peregrine falcon (*Falco peregrinus ssp. anatum*); double-crested cormorant (*Phalacrocorax auritus*); white-faced ibis (*Plegadis chihi*); Cooper's hawk (*Accipiter cooperii*); sharp-shinned hawk (*Accipiter striatus*); northern harrier (*Circus cyaneus*); white-tailed kite; merlin (*Falco columbarius*); long-billed curlew (*Numenius americanus*); western burrowing owl; (*Athene cunicularia ssp. hypugea*); loggerhead shrike (*Lanius ludovicianus*); california horned lark (*Eremophila alpestris ssp. actia*); tri-colored blackbird (*Agelaius tricolor*); southern California saltmarsh shrew (*Sorex ornatus ssp. salicornicus*); San Diego black-tailed jackrabbit (*Lepus californicus ssp. bennettii*); south coast garter snake (*Thamnophis spiralis ssp.*); Southern California legless lizard (*Anniella stebbinsi*); sandy beach tiger beetle (*Cicindela hirticollis ssp. gravida*); globose dune beetle (*Coelus globosus*); wandering (saltmarsh) skipper (*Panoquina errans*); and California brackishwater snail (*Tryonia imitator*).

Procedures and Ongoing Management for the Protection of the Environment: The Ormond Beach Project Management Area is managed cooperatively by the Project Partners. Through a Memorandum of Understanding executed in 2016, the Project Partners have identified shared goals for the protection and restoration of Ormond Beach and associated habitats. The City of Oxnard passed an ordinance in 2016 (Ord. 2906) that regulates activities in the project area in order to protect sensitive species and habitats. TNC provides private security to the project area to deter illegal human encampments, trespass, and habitat impacts. Together, the Ormond Beach Project Partners work collaboratively to support education and outreach to the community about the importance of these habitat areas support community involvement in stewardship activities.

The implementation of this Project will further these procedures and ongoing management for the protection of the environment by addressing the immediate and long-term conservation of threatened habitats and species that are critical to future wetland resiliency and wetland area expansion.

- Eradication of invasive species impacting narrowly distributed, endemic species such as the Salt marsh bird's beak is expected to have lasting conservation

benefits of 100 years or more. Many of the invasive species in the Project Area are emergent and serve as the seed source for the surrounding area. Through eradicating these eleven species and continuing to partner with the Naval Air Station Point Mugu, these species will be eradicated from the greater wetland complex. Coordination with Naval Air Station Point Mugu and ensuring consistency with the Navy's Integrated Natural Resources Management Plan objectives of invasive species eradication will ensure lasting benefits on the project area and adjacent Navy lands. Project Partners will work with the Ventura Fish and Wildlife Office during invasive species removal to maximize project benefits for listed species in the project area. Invasive species targeted for control, mostly non-native trees, are expected to have a 20-year benefit.

- The removal of trash from the Ormond beach project area by volunteers will permanently reduce the amount of trash reaching the Pacific Ocean. Reductions in trash and pollution in waterways and wetlands achieved through this project will be permanently enhanced through the concurrent implementation of the South Oxnard Flood Management and Community Enhancement Project that will limit pollution through infrastructural improvements.
- Installation of habitat protection infrastructure, such as durable fencing, will provide an estimated 20 years of conservation benefits to threatened coastal dependent bird species.
- The restoration actions and associated outreach and education will increase the likelihood of successful implementation of future phases of the restoration plan and will foster community stewardship necessary for long-term conservation and endurance of the Project.

TNC has, by order of their title restrictions, conserved the privately-owned properties in perpetuity through an irrevocable offer to dedicate title of the lands. An additional 33 acres of the TNC lands are covered by a Restrictive Use Easement, held by the U.S. Dept. of the Navy, that includes endowment funding for maintenance of the properties.

In addition, the Project Partners have completed the Ormond Beach Long-Term Management Entity, Final Draft Strategic Business Plan (2017) that identifies goals and strategies for organizational development, funding, marketing, and capacity building that leads to successful long-term restoration, management, and protection outcomes at Ormond Beach.

Lastly, the Project represents Phase 2 of the larger 5-Phase Ormond Beach Restoration and Public Access Project (OBRAP) that will restore the Project Area to a natural character, enhance public access opportunities for Oxnard and all of Southern California, and provide for coastal resilience as sea levels rise. Goals of the 650-acre coastal restoration OBRAP are to improve freshwater, estuarine, and marine water quality and fisheries habitat, benefit nearby marine managed areas, enhance the resilience of coastal habitats and species to sea level rise and climate change, and to

provide access and recreation opportunities for local disadvantaged communities and visitors. This Project includes removal of non-native invasive vegetation and will build on existing acquisition and enhancement efforts as well as serve as a catalyst for future restoration phases within the Ormond Beach Restoration Project area. Phase 2 emphasizes existing habitat and species protection necessary for future expansion and resiliency. This project responds to numerous public comments, surveys and workshops that identify increased community stewardship, engagement with local disadvantaged communities and protection of habitats as priorities and necessary antecedents to full project implementation. Ultimately, the successful completion of the OBRAP will demonstrate that complex and collaborative projects can be accomplished, and it will contribute to lasting regional conservation goals.

- D. Pursuant to Public Resources Code section 21080.56, subdivision (d), the CDFW Director concurs with the Lead Agency that the Project does not include any construction activities, except those solely related to habitat restoration. There are no construction activities associated with the Project.

This Project will only implement the following restoration-oriented activities:

1. Restoration, Enhancement and Management Procedures
 - i. Nonnative Invasive Plant Control
 - ii. Trash Removal and Monitoring
 - iii. Nesting Habitat Protection
2. Community engagement, outreach, and education procedures
 - i. Volunteer Naturalists Recruitment
 - ii. Community-Organized Clean Up Events
 - iii. Community Workshops

Scope and Reservation of Concurrence

This Concurrence is based on the proposed Project as described by the Lead Agency Determination and the request for concurrence submitted to CDFW on March 24, 2022. If there are any subsequent changes to the Project that affect or otherwise change the Lead Agency's Determination on March 24, 2022, 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.

Any other public agency that proposes to carry out or approve the Project, including CDFW, shall exercise their independent judgment as required by law and determine whether Public Resources Code section 21080.56 applies. If any public agency determines in an exercise of its independent judgment the statutory exemption applies, this Concurrence shall remain in effect and no separate concurrence from CDFW shall be required if that public agency determination is based on the proposed Project as described by the Lead Agency Determination and the request for concurrence submitted to CDFW on March 24, 2022, and no Project changes or changes in condition could affect that Lead Agency Determination.

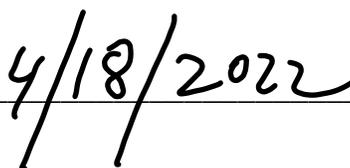
Other Legal Obligations

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 Director's Certification

By:  _____

Charlton H. Bonham, Director
California Department of Fish and Wildlife

Date:  _____