

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:	City of Santa Monica
Contact Person’s Name:	Rachel Kwok
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2. PROJECT PROPONENT

Check Box and Skip to Number 3 if Same as Lead Agency

Business/Agency/Organization:	The Bay Foundation
Contact Person’s Name:	Tom Ford
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3. PROJECT INFORMATION

A. Project Name:	Santa Monica Beach Dunes Restoration Project – Phase 3
B. County or Counties:	Los Angeles
C. Lat./Long. Coordinates:	33.996111 118.481944 through 34.026667 118.5175 (Attachment 2)
D. Estimated Project Start/End Dates:	December 2024 – December 2035

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.

The Dunes Restoration Project (the project) will be implemented by The Bay Foundation (TBF) on Santa Monica Beach. Therefore, the project will require City of Santa Monica City Council approval of an amended Contractual Services Agreement between TBF and the City of Santa Monica. This approval is expected in Summer 2024.

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



Based on the success of the 3.25-acre dune restoration of phase 1 in Santa Monica (Attachment 1), and the recent dune restoration of 5-acres as 'phase 2', the City of Santa Monica is partnering with TBF for proposed restoration of an additional 46-acres of coastal sand dunes with California native vegetation on Santa Monica State Beach. The proposed project consists of a checkerboard-type footprint of smaller polygons, ranging from one to two acres in size, spanning the beach from the border with Will Rogers State Beach to the border with Venice Beach (Attachment 2). To balance the need for recreational space and access to the shore with conservation and coastal resilience, some of the polygons will be along the shoreline and the other polygons will form a back dune habitat adjacent to the bike path, parking lots and the upper portions of storm drain outfalls.

The project is fully funded by State legislative appropriation to TBF, with funds managed by the State Coastal Conservancy.

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 work plan (Attachment 3) for this dune creation project involves a sequential approach along 4 areas (10-13 acres/area) of the coastline within the borders of the City Santa Monica (Attachment 4). Each phase of this dune restoration project will consist of six components: 1) area delineation and restoration, using a minimalist post-and-rope boundary approach to define polygons and pedestrian pathways and minimal use of sand fencing, followed by the introduction of California native dune vegetation species from a palette approved by the California Coastal Commission (CCC) (Attachment 5) with seed and container stock; 2) using standardized and regularly scheduled dune monitoring protocols to measure success and inform adaptive management (supplementing seed and container stock), and regular maintenance, such as weeding and litter removal, by TBF staff through the duration of the project. City staff will be trained and prepared to care for the sites, as well; 3) community outreach using engaging signage and social media; and 4) public engagement by way of regularly scheduled volunteer events; 5) educational opportunities for all levels of students; and 6) basic and applied research to improve understanding of dune creation, sand accumulation, and the associated dynamism.

The Project is expected to benefit the environment in several ways. First, while simultaneously increasing the beauty of the beach, it will increase the diversity of California native vegetation, ultimately leading to establishment of habitat for a number of additional species, some of which are species of concern, including the western snowy plover, the California legless lizard, the globose dune beetle, El Segundo blue butterfly, and possibly the California least tern. The project is also expected to trap and accumulate sand in erosion resistant vegetated hummocks due to the nature of a well-developed rhizosphere, or below-ground network of biomass that stabilizes the sand.

Pre- and post-implementation monitoring will inform adaptive management decisions. After the initial restoration, phase maintenance may be necessary and would involve either additional seeding and planting with container stock, or both. Once the project is well established, the requirements for maintenance will be minimal, and managed by the City.

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.

Outreach to tribes affiliated with the Santa Monica area was initiated on 15 April 2024 in the form of a personal email sent individually to the 13 designated tribal representatives (Attachment 6) on the City's tribal consultation list (obtained from the Native American Heritage Commission). In one case, after email contact failed, a paper letter was sent to the Chair of the Barbareño / Ventureño Band of Mission Indians. Follow-up phone calls to all representatives were made on May 16-17, 2024. Ultimately, TBF had telephone conversations with 10 of 13 tribal representatives.

TBF followed up on May 24, 2024, with a project presentation in PDF format much like the sample handout for



stakeholders (Attachment 7). An open invitation to collaborate with the TBF on this project was provided to the tribal representatives. The TBF plans to continue outreach throughout the initiation of the project.

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.

Extensive public outreach will be conducted prior to and through project implementation through a series of public meetings, stakeholder workshops, and public field trips. A study session with City Council to receive Council and public comments is due to take place in Summer 2024. Once public feedback is received from City Council, adjustments to the dunes footprint will be made prior to project approval. Subsequently, a first round of stakeholder meetings on-site will be held with the public agencies, such as State Parks, LA County Department of Beaches and Harbors, LA County Lifeguards, Santa Monica Police, Santa Monica Public Works, etc. Also included in this round of stakeholder meetings are other elected officials (neighborhood, County, State, Federal), and other organizations, including Sea Grant, Surfrider Foundation, State and local chapters of Audubon, and Heal the Bay. A community handout will be published and distributed, describing the importance of sand dunes for coastal resilience and biodiversity, and a map of the proposed footprint (Attachment 7).

Once public feedback is received, a second round of stakeholder meetings will be held, which will be specifically for local residents and business owners. This will be held in-person in a local, accessible location and virtually to maximize our reach to the public. In both settings a slide show demonstrating the benefits, with photos of successful Santa Monica dunes and the footprint, with renderings for scale and color, will be presented (Attachment 8). Further, an online comment period will be conducted to provide residents with the opportunity to contribute to this stage of the project. Ultimately, the footprint of the dunes will be adjusted after the input of each of these three rounds of outreach.

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.

The City of Santa Monica has determined the project is exclusively a project to conserve, restore, protect, or enhance, and assist in the recovery of California native wildlife, and the habitat upon which they depend, and a project to restore or provide habitat for California native wildlife.

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

The project will establish habitat for the benefit of California native species that use Coastal dune, foredune, and back dune plant communities and the physical dune structure that is created by these plant communities. Vehicular accessways and public access trails will redirect foot traffic past the protected areas for the purpose of promoting the protection of all species, but particularly several sensitive species.

Once established, the project will prevent vehicles and grooming machinery from entering the polygons, which will enable the development of native plant communities and the natural formation of dune structures with the associated reinforcement of the rhizosphere. The accumulation of sand will be an excellent means of providing coastal resilience while increasing and protecting biodiversity.

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

The City of Santa Monica has determined that the project may have incidental public benefits.

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

As there are no existing features on the beach to direct traffic, it is expected that the project would have incidental benefits by providing clear pathways to direct public access to the shore and recreational areas. Pathways would be strategically placed to direct foot traffic from parking lots to the shore while reducing impacts to the sensitive dune habitat. Existing volleyball courts will be left intact. All recreational permitting by the City as well as patterns of high-intensity beach use (parking data and seasonal aerial photographs) have been taken into account during the envisioning of the dunes footprint. Further incidental benefits include additional opportunities for birding and wildlife viewing, original research, education, and the advancement of coastal management strategies for the State of California.

Education and outreach efforts will raise awareness to the public about the sensitive nature of this plant community and the associated sensitive species, and to the importance of nature-based solutions for coastal resilience. As a part of this project, an educational program will be incorporated into the newly established curriculum guidance from the Santa Monica Malibu Unified School District's Board of Education, in which climate change must be incorporated into all three major levels of education in the District (elementary, middle, and high schools).

The restored dunes may also create a natural buffer between the ocean and beachfront homes and municipal infrastructure.

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.

The City of Santa Monica 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:

In addition to providing habitat for wildlife and beautifying beaches (Attachment 9), dune systems accumulate and sequester sand in the rhizosphere as plants mature, resulting in structures that are resistant to erosion. The erosive threats of sea level rise and intensifying storms leave mechanically groomed beaches vulnerable to erosion. Dune vegetation build dunes that resist such erosive forces with a remarkable resilience. The vegetation in the embryo dunes at the forefront of phase 1 of the dunes project, namely saltbush (*Atriplex leucophylla*, Amaranthaceae), have exhibited post-disturbance recovery accompanied by sand replacement and though we have yet to quantify this, it appears that growth has been stimulated by the inundation of sea water during the king tide storm intrusion in February 2024. As such, with the development of the embryo dunes coupled with the increased elevation of the foredunes, the natural "softscape" of sand dunes will greatly improve coastal resilience, and the long-term benefits of habitat availability to coastal wildlife, including for sensitive species.

As a bonus, the dunes will also create a natural buffer between the ocean and beachfront homes and municipal infrastructure.

Long-Term Net Benefits to Biodiversity:

The proposed project will increase biodiversity by establishing California native coastal dune vegetation, from a previously approved species palette to an otherwise highly disturbed sandy beach. While none of the species on the plant palette are special-status plants, the coastal dune vegetation of southern California is among the most rare in the region. During the stormy seasons post-restoration, natural driftwood and seashells will be placed into the restoration areas. The driftwood would add natural character to the site, contribute with sand accumulation and dune formation, and provide microhabitats for additional wildlife. Shells add texture, further aid in sand accumulation and provide nesting materials for birds. Additionally, the back dune areas will have a slightly larger plant palette than those in the foredune location (Attachment 5).

Substantial increases in the diversity of native flora and fauna are expected. This coastal dune plant community will attract a wide array of additional wildlife, from invertebrates such as spiders, beetles, and butterflies to the potential for the California legless lizard, and birds, several of which are species of interest (Attachment 10). Nesting shorebirds, such as the western snowy plover and the California least tern, will benefit by the increase in protected roosting and nesting sites, and in the back dune restoration areas, with the addition of sea cliff buckwheat the host plant for the federally endangered El Segundo blue butterfly will be provided.

Long-Term Net Benefits to Sensitive Species Recovery:

In addition to increasing the presence of one of southern California's most rare plant communities, namely the coastal dune plant community, the project will benefit the recovery of listed species including the western snowy plover, globose dune beetle, the California legless lizard, El Segundo blue butterfly and potentially the California least tern (Attachment 10). Habitats that support these species will be expanded and protected.

The plant palette (Attachment 5) will be approved during the permitting process, it is anticipated that it will include such dune architects as silver beach bur (*Ambrosia chamissonis*, Asteraceae), red sand verbena (*Abronia maritima*, Nyctaginaceae), beach evening primrose (*Camissoniopsis cheiranthifolia*, Onagraceae) and the impressively resilient saltbush (*Atriplex leucophylla*, Amaranthaceae), which tends to establish along the high tide line.

The project will reduce threats to these species by controlling invasive plants and preventing disturbance by heavy machinery, canine presence, and human foot traffic within the restoration areas. Education and outreach efforts will raise awareness to the public about the sensitive nature of this coastal dune plant community and the associated sensitive species.

Procedures for the Protection of the Environment:

The project includes procedures that will protect the environment through measures that include avoidance of species of concern (Attachment 10) through respecting work windows and pre-project surveys, environmental awareness training for all staff working on the project, and on-going environmental monitoring as well as ongoing consultation with Audubon and other specific wildlife biologists for the protection and expansion of sensitive habitat and wildlife. Biological monitoring and implementation oversight will be provided by qualified biologists from TBF staff. Because the project site is on sandy beach that is heavily disturbed due to decades of mechanical grooming, any sensitive species in the project area are expected to arrive post implementation. The western snowy plover is the one possible exception.

Protective measures of the project align with those described in the USFWS Programmatic Biological Opinion (USFWS 2022-0005149-S7), including general protective measures for bird and butterfly species. Should sensitive species recruit to the project area due to the increase in habitat, the habitat will be avoided while such species are present to the maximum extent possible. Further, where presence is confirmed or presumed to occur, TBF qualified biologists will ensure habitat avoidance during breeding season and that project activities occur during the nonbreeding season. For some species, project activities will be confined to USFWS



prescribed dates (USFWS 2022-0005149-S7), such as 16 September through 31 March for the California Least Tern, given that the project is south of the Monterey/San Luis Obispo County line, and 1 October through 28/29 February for the western snowy plover.

If the El Segundo Blue Butterfly disperses to any part of the project, weed control will be avoided from 16 May through 30 September, during the adult flight season and when larvae are active. Further, all staff will be trained to avoid the no-step butterfly zone around the host plant, *Eriogonum parvifolium* (Polygonaceae). If any sensitive species not listed here (Attachment 10) should recruit to any part of the project, USFWS and CDFW staff will be notified as soon as possible within two working days of the observation.

Ongoing Management for the Protection of the Environment:

The City staff and TBF are committed to increasing the abundance of California native coastal vegetation and the associated wildlife. This project will continue the work of establishing sand dunes on the beach.

The work plan (Attachment 3) includes standardized post-implementation monitoring on an annual basis, which will inform adaptive management as the dune community establishes and develops. Monitoring includes quantifying the physical changes in the structure of the beach, native and non-native vegetation cover, seedling densities and focused wildlife surveys. Being sensitive to work windows, the work plan also includes the subsequent addition of native vegetation, if and where needed, with seed and container stock for the 3 years following implementation. It also includes volunteer events to remove non-native species and trash from the sites.

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

The City of Santa Monica 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.

The project includes minor installation activities that are solely related to the establishment of area boundaries in the form of 1-inch galvanized steel posts, spaced 10m apart, and 1-inch uncoated manila rope (Attachment 11). The galvanized steel posts do not corrode to become rusty hazards, and the materials for the rope and signs are made from natural, biodegradable materials.

The use of heavy vehicles to implement this project will be minimal, using vehicles that the City uses for beach maintenance already. City beach maintenance pickup trucks will be utilized to haul supplies to each polygon location, and during the winter months when the City is removing driftwood from the beach, the occasional bucket loader tractor will deliver driftwood to add to the sites. Driftwood will be added by hand after delivery.

Posts will be installed by hand, using fence post drivers. Posts will ultimately be approximately 38in (96.5cm) high. No sand nourishment or dune contouring will be a part of this project. Small (5.5in x 8in; 14cm x 20.3cm) uncoated wooden signs will be attached to every other post, amounting to 20m spacing. Each sign is laser-engraved with “sensitive wildlife habitat” and a reference to the public access pathway. Additionally, the QR code leads to the Beaches page on the TBF web site and will translate to the user’s preferred language upon scanning. This aesthetically neutral approach minimizes impacts to the view shed, while clearly delineating and engaging the public.

The project is designed to use minimal materials to delineate the spaces (post and rope), and provide minimalist informational signage that is biodegradable, as well as easily and inexpensively replaced (Attachment 11). Finally, the maintenance of these sites will be accomplished with hand weeding and trash pick-up and hauling.



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.

Date: June 20, 2024

Lead Agency Signature

Printed Name and Title: Rachel Kwok, Environmental Planner.