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ECOSYSTEM CONSERVATION DIVISION
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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 For example, island chaparral communities have been replaced by nonnative annual grasslands and vegetation composition has shifted toward species that are less palatable to mule deer.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.

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-

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

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

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.

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.

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

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.

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

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By: Joshua Grover _____ Date: 1/26/2026
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Joshua Grover, Deputy Director
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