Channel Islands and Port Hueneme Harbors Maintenance Dredging Project Hollywood Beach Mitigation Plan: Response to Public Comments

The U.S. Army Corps of Engineers, or USACE, presented the Hollywood Beach Mitigation Plan at a virtual public outreach meeting July 24, 2025. The mitigation plan, designed to offset impacts from maintenance dredging at Channel Islands Harbor through dune restoration, was presented to the Hollywood Beach Community to gather feedback.

Community members provided comments during the public meeting verbally and via chat, through a dedicated Microsoft Online Form and by email. This USACE response is organized by topic area, with each section addressing a common theme raised in the public comments. Within each section, USACE summarizes the comments and provides a corresponding response.

For additional information, please visit the project website at https://www.spl.usace.army.mil/Missions/Civil-Works/Navigation/Channel-Islands/.

Public Outreach and Engagement

Why wasn't public outreach started sooner?

USACE conducts many types of projects and follows different processes, depending on the project type. For instance, an ecosystem restoration project initiated by a non-federal sponsor, such as a city, typically begins with a public scoping phase during the feasibility study. Mitigation plans associated with authorized USACE projects, as in this case, follow a different path. Before public outreach, USACE coordinates with the local resource agencies, like the U.S. Fish and Wildlife Service and California Coastal Commission to develop an acceptable mitigation strategy for the project's environmental impact. For this mitigation plan, USACE simultaneously worked with Ventura County and the California State Lands Commission to verify land ownership and ensure the designated area could be used for dune restoration purposes. Identifying a mutually agreeable mitigation strategy with the key agencies and verifying the feasibility of implementation are essential prerequisites to the Hollywood Beach community outreach. These steps established the

foundation for a meaningful and informed discussion with the community regarding the mitigation plan.

How is the process transparent? How can we trust it?

USACE values transparency and has shared information about the mitigation plan, process and path forward through various channels, including the July 24 public meeting, email, individual conversations, website updates and responses to frequently asked questions. Initial planning involves consultation with permitting and resource agencies to develop an acceptable mitigation strategy. The results of that process are made available to the public.

How is community feedback being communicated to decision makers?

USACE ensures that Hollywood Beach community feedback reaches district leaders and resource agency decision makers through multiple channels, including direct involvement and briefings. Senior USACE management is directly involved in community engagement, as demonstrated by their active role in developing and facilitating the July 24 meeting. Community concerns are regularly communicated to and briefed to the full chain of command at USACE's Los Angeles District and in meetings with the resource agencies.

Are only "refinements" to the plan possible?

USACE is carefully considering all the public comments received about this mitigation plan. USACE's ability to make significant changes to the mitigation plan is limited by the need to meet mitigation requirements to offset the environmental impact of the Channel Islands and Port Hueneme harbors' maintenance dredging project. USACE is committed to working with the public and local resource agencies to explore opportunities to integrate community preferences, such as in the final design of the symbolic fencing.

When is the next meeting?

A follow-up public meeting was tentatively scheduled for Oct. 29. Unfortunately, due to the federal government shutdown, this meeting was postponed. The event is tentatively scheduled, pending an end to the government shutdown, for the evening of Nov. 19, 5:45 to 8:15 PM, at Hollywood Beach Elementary, 4000 Sunset Ln, Oxnard, CA 93035. The team will continue to monitor the situation and will send notification no later than Nov. 12 with confirmation regarding the event, timing, and agenda. USACE will provide updates via our email distribution list. Individuals can join our email list by sending a message to CESPL-Channel-Islands-Hueneme-Dredging@usace.army.mil with the subject line "Hollywood Beach Mitigation Email List."

Can there be a study on community concerns?

USACE is actively seeking to understand Hollywood Beach concerns through the ongoing public engagement process. This process includes the July 24 public meeting, emails and conversations with community members to gather and understand the community's questions and concerns.

Why did USACE prepare an Environmental Assessment instead of an Environmental Impact Statement?

To assess potential environmental impacts for the six-year maintenance dredging program at Channel Islands and Port Hueneme harbors, USACE prepared an Environmental Assessment. This evaluation considered the effects of dredging, dredged material placement and offsetting measures, like dune restoration, to address effects to the federally threatened western snowy plover and the federally endangered California least tern species. USACE determined the environmental impacts would be less than significant, and, therefore, an Environmental Impact Statement was not required. A Finding of No Significant Impact was then signed by USACE and published on the USACE Digital Library, concluding the National Environmental Policy Act process. The Environmental Assessment and Finding on No Significant Impact are available here:

https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/27024

Project Need and Purpose

What is the relationship between dredging, habitat and restoration?

The dune restoration effort aims to offset environmental impacts of federal maintenance dredging on sensitive dune habitat, and on the western snowy plover and California least tern, both protected under the Endangered Species Act. Maintenance dredging at Channel Islands Harbor is essential to keep harbor inlets navigable and sustain downcoast beaches; however, dredging can affect the western snowy plover and California least tern and their habitats, specifically at the harbor's north entrance jetty and detached breakwater sand trap, which creates a widened beach and coastal foredune habitat used by both the western snowy plover and the California least tern. Dredging disrupts these areas and adversely affects designated critical habitat by damaging or removing nesting, roosting and foraging areas. USACE consulted with the U.S. Fish and Wildlife Service, under Section 7 of the Endangered Species Act, and received a biological opinion requiring the development and implementation of a habitat restoration plan. Additionally, the California Coastal Commission conditionally concurred with USACE's consistency

determination, under Section 307 of the Coastal Zone Management Act, reinforcing the restoration requirement.

Why now and not before? Why here? Why not elsewhere?

USACE became increasingly aware of project effects in recent years, including the extent of habitat loss that can occur well beyond the dredge-cut boundary. Impact analyses coincide with the award of multi-year dredging contracts, creating intervals between formal assessments. Furthermore, there has been an increase in the volume of material dredged from the sand trap. This larger volume of material dredged from the sand trap exacerbates impacts to sensitive dune habitat, which are identified as an Environmentally Sensitive Habitat Area by the California Coastal Commission and as critical habitat designated for western snowy plover by the U.S. Fish and Wildlife Service, under the Endangered Species Act. Dredging reduces available foraging, roosting and nesting habitat for the western snowy plover and the California least tern. Both species are present on Hollywood Beach. USACE consulted with the U.S. Fish and Wildlife Service, under Section 7 of the Endangered Species Act, and received a biological opinion requiring the development and implementation of a habitat restoration plan. Additionally, the California Coastal Commission conditionally concurred with USACE's consistency determination, under Section 307 of the Coastal Zone Management Act, which also requires the development and implementation of a dune restoration plan.

The mitigation plan is designed to offset impacts of maintenance dredging on the local population of federally listed species. Hollywood Beach falls within the maintenance dredging impact area. Restoring habitat here provides replacement nesting, roosting and foraging habitat for species directly displaced by dredging. Restoring habitat in other coastline areas outside of Hollywood Beach would not adequately address the direct impacts to local populations of these species nor would it address impacts to Environmentally Sensitive Habitat Area and designated critical habitat caused by the dredging activities.

What alternative approaches were considered to meet objectives and maintain current environment of Hollywood Beach?

Following USACE guidance, under Engineer Regulation 1105-2-100, and standard practice for developing and approving mitigation, USACE coordinated with the U.S. Fish and Wildlife Service and California Coastal Commission to determine that mitigation should be in-kind, which entails replacing an impacted natural resource with the same type of resource with the goal of replicating functions and values as closely as possible. Additionally, guidance

and standard practice calls for this type of mitigation to occur proximate to the impacted area, where feasible, to minimize or offset effects to local wildlife. In discussion with the U.S. Fish and Wildlife Service and California Coastal Commission, the parameters for acceptable mitigation were established based on the type, extent and location of maintenance dredging project impacts. The mitigation plan must include sufficient acreage of dune and foredune habitat that replicates the quality and extent of habitat affected by dredging and must be centered in the immediately adjacent beach area, where the western snowy plover and California least tern are known to relocate after preferred nesting habitat is impacted by recurring dredging activities. These parameters limited or eliminated options for offsite restoration.

Why 18 acres and how was this calculated?

The 18-acre restoration is required to compensate for the negative impacts of maintenance dredging on sensitive dune habitat, an Environmentally Sensitive Habitat Area and designated critical habitat for the western snowy plover. It is estimated that each dredging cycle will impact about six acres of sensitive dune habitat. The exact amount can vary depending on factors, such as storm frequency and intensity. The California Coastal Commission requires a 3:1 restoration ratio for impacts to Environmentally Sensitive Habitat Area. This means that for every acre of Environmentally Sensitive Habitat Area affected, three acres must be restored; therefore, six acres of impact multiplied by a 3:1 ratio, equals 18 acres of restoration. This ratio accounts for the temporal loss of habitat function, recognizing that it takes time for a restored area to fully recover. It also provides a buffer for potential restoration failures or future habitat degradation. While impacts to designated critical habitat for the western snowy plover also require mitigation, the acreage required for mitigation is less than the 18 acres required for the Environmentally Sensitive Habitat Area; therefore, the designated critical habitat mitigation is included within the larger 18-acre restoration plan. The restoration implemented for the 18 acres will address both the harm to Environmentally Sensitive Habitat Area and to designated critical habitat.

Is the dredge template/boundary going to change? Will the dredge come further into the beach zone and get closer to the current dunes?

The outer limits of the dredge template/boundary will not change. The dredge will not extend further onto the beach or closer to the dunes than the existing boundary allows; however, the amount of dredging within the boundary may vary between cycles. In some cycles, less dredging may be needed; in others, more dredging may be necessary, up to the boundary. The decision is based on the amount of sand buildup and the funding available.

How do dunes relate to bird nesting habitat, which is on flat sand?

While the western snowy plover and the California least tern do nest on flat sand and within low natal dune areas with sparse vegetation, these birds use and rely upon dune habitat. Western snowy plovers nest in shallow depressions, or scrapes, in the sand, often near vegetation or debris for camouflage. Dune habitat provides open areas with good visibility for detecting predators, as well as loose sand for nest construction. California least terns often nest on beaches or bare areas adjacent to dune systems. The dunes act as a natural buffer, helping to protect nesting sites from storms, high tides and human disturbance. The western snowy plovers use dunes for foraging, roosting and predator and wind protection. This is particularly important for young flightless chicks.

Western snowy plovers are increasing, and current mitigation works. Why interfere? What if the project harms this success?

Current efforts to support western snowy plovers, such as the temporary fencing used to protect nests, are effective; however, maintenance dredging disrupts key nesting areas that historically hosted the largest populations and provided primary constituent elements of critical habitat for the western snowy plover. The mitigation plan aims to enhance and establish coastal foredune habitat to support these affected populations. The mitigation will be carefully monitored and the mitigation plan will be adjusted, if any unforeseen negative impacts arise.

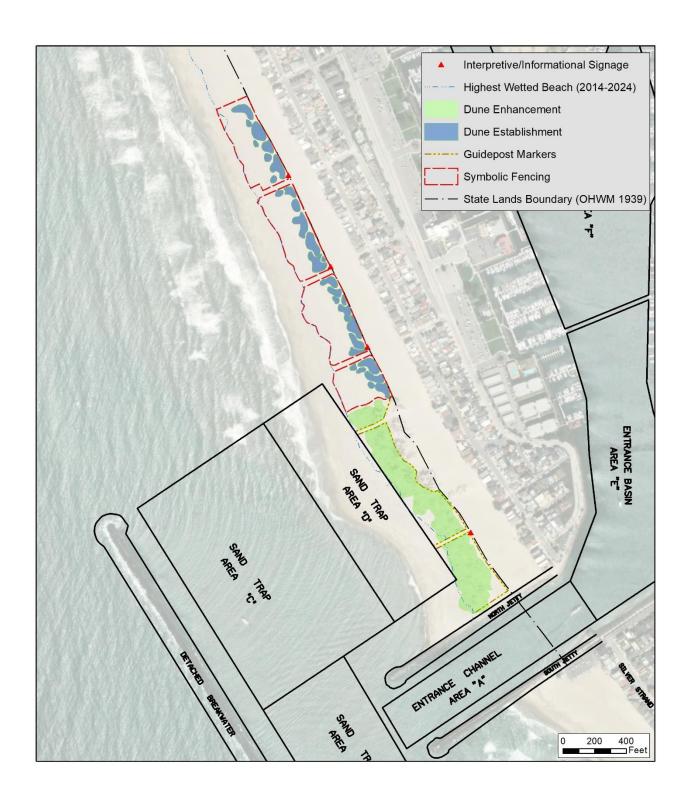
Project Description

How long will it take to construct?

The initial construction phase of the mitigation plan is expected to last about four months. Monitoring, adaptive management and maintenance will span a six-year period to assess the mitigation's success and guide any necessary adjustments.

Specific boundary information?

The dune restoration will occur entirely on state lands. Additional access for construction will use county lands. The restoration area extends along the beach from the North Jetty to Los Feliz Street, a distance of about 3,600 feet. The width of the restoration area varies throughout, reaching up to about 300 feet at its widest point.



Where will constructed dunes be relative to natural dunes? Will current dunes be impacted or moved?

Dune establishment will extend northwest along the beach from the well-established existing dunes. While existing dunes will remain in place, some within the restoration boundaries will be enhanced by removal of non-native vegetation and recontouring of sand dunes to natural dune contours, when necessary.

Is this restoration permanent?

Dune restoration construction will be temporary, lasting about four months. Once established, the dunes are intended to remain in place, supported by the planting of native vegetation that will help stabilize them over time.

What will be the height of dunes and why? How they will be established?

The mitigation plan will enhance and establish coastal dune habitat by incorporating low-profile dunes, ranging from 0.5 to 4 feet in height, planted with native vegetation. These heights are consistent with natural dunes found along the California coast. In contrast, some existing dunes on Hollywood Beach have grown significantly taller than the natural range, due to non-native vegetation. During the dune establishment period, maintenance will focus on removing or controlling the spread of non-native vegetation, as much as possible. The dunes will be constructed using beach sand from the immediate area, with no need to import additional sand.

Will there be any easements impacted by the project and how will they be maintained?

The mitigation plan will not affect any easements, as all activities will take place entirely on public lands.

Will artificial dunes "count" as Environmentally Sensitive Habitat Area?

Both the existing dunes, that will be enhanced, and the newly established dunes will all be considered Environmentally Sensitive Habitat Area.

The March 2025 plan says six acres will be lost near the sand trap with every dredge cycle. Why restore there, if it will be lost?

Mitigation is required due to the six acres impacted by dredge cycles. The restoration area is located outside of this impact zone.

Are there examples of similar projects in other parts of the country?

Dune restoration is a relatively common and established technique that has been used to effectively meet multiple purposes, such as coastal storm risk management and habitat restoration. At the same time, each project is unique and based on the specific objectives and context.

Fencing

Why can't we just continue with the temporary fencing? Why do we need this different fencing now?

Temporary fencing is used to protect nesting western snowy plover and California least tern on the sandy beach. This fencing safeguards nests from threats, like pedestrian traffic, dogs and predators, by blocking access to specific areas of the beach. Symbolic fencing, part of the mitigation plan, serves a different purpose. Rather than protecting individual nests, this fencing encourages the development of vegetated dunes, which provide habitat for nesting, foraging, shelter and roosting. Consequently, the symbolic fencing is less restrictive than the temporary fencing.

What does "symbolic" fencing mean? What is the purpose/function of symbolic fencing?

The term "symbolic fencing," as referenced in the mitigation plan, refers to fencing that delineates a boundary, rather than physically blocking access. Unlike restrictive fencing, such as the temporary fencing used on Hollywood Beach to protect nesting western snowy plover and California least tern, symbolic fencing in not intended as a barrier. Instead, it acts as a visual reminder of the restored habitat and protected species present on the beach. The type of fencing being considered is a post and single-rope or cable system that would encourage, but not restrict, pedestrians to use existing access routes from public streets to the beach. The picture below shows one style of symbolic fencing that could be used.



Will all 18 acres be fenced? What is the size of the beach that will be fenced roped/off?

Symbolic fencing will be used on portions of the 18-acre restoration area, primarily in the areas north of the existing dunes, where new dune habitat is being established. The fenced acreage will be determined in coordination with the U.S. Fish and Wildlife Service and the California Coastal Commission and will include pathways to the beach in line with street access points. In areas where existing well-established dunes will be enhanced, symbolic fencing will not be used. In these areas, pathways aligning with existing street access points will be defined using guideposts – posts placed along the pathway that would not be connected by ropes or cables. These guideposts, made of wood or plastic wood, will be between 32 and 36 inches tall and placed every 20 feet for the initial construction. As part of the mitigation plan, USACE will monitor the effectiveness of the guideposts. If monitoring reveals the guideposts are insufficient to prevent habitat damage, additional protective measures, such as symbolic fencing, may be implemented. To convert the

guideposts to symbolic fencing, intermediate posts could be placed to create a span of 10 feet and connected by a single strand rope or cable.

Will fences block ocean views? Solid fencing or single rope?

The fencing will consist of posts about 32-36 inches high, spaced 10 feet apart, with a single rope or cable strung through the top. This "symbolic" fencing is designed to not block ocean views. Its purpose is to delineate the restoration area without restricting pedestrian access or sightlines.

How long will fencing be up?

The duration of the symbolic fencing is still to be determined and requires further coordination with the U.S. Fish and Wildlife Service and the California Coastal Commission regarding the adaptive management component of the restoration plan. Pending coordination, adaptive management may include flexibility to remove or install symbolic fencing in specific areas of the restoration site, dependent upon the success of the restoration, level of disturbance to the habitat and its overall resilience.

Is fencing beneficial or harmful to the western snowy plover? Why use permanent rope fencing, when it will not exclude predators as well as the current temporary fencing?

The symbolic fencing is designed to benefit western snowy plover and California least tern by aiding in the establishment of their habitat. The fencing is not anticipated to have any other direct impacts on either species. Unlike the temporary fencing currently used on Hollywood Beach, the symbolic fencing is not intended to exclude predators or act as a barrier to protect specific nesting sites or individual birds. Its purpose is to delineate the restoration area, encourage beachgoers to use the pathways and support the growth of the dune vegetation crucial for the western snowy plover and California least tern habitat.

Will western snowy plovers stay inside the fenced area or will fencing need to be expanded if plovers nest outside that boundary?

Western snowy plovers are not anticipated to remain solely within the fenced area. The symbolic fencing facilitates dune habitat restoration, which aims to increase western snowy plover use. Plover nests outside the restoration area will not trigger fence expansion; however, temporary nesting-season fencing will continue to be placed around active plover nests as needed, independent of USACE's mitigation plan.

Why not simply install bollards for vehicles at beach access points to mitigate damage from truck and cart traffic?

Although bollards can effectively manage vehicle traffic at street access points, USACE's mitigation plan does not extend to those specific areas. USACE has passed this suggestion along to Ventura County. Within the restoration area, USACE is concerned with encroachment that would impact the establishment of dunes and dune vegetation. Fencing offers a more comprehensive approach to guiding pedestrian traffic, whereas bollards are solely designed to block vehicle passage.

Access and Recreation

Will we or our children be fined for crossing the symbolic fencing line and entering the restoration area? For example, will people be able to sit on top of the dunes and watch the sunset?

Ventura County and the California Coastal Commission are responsible for beach management and have the authority to enforce regulations regarding beach use, including within the restoration areas. While pedestrian access into the restoration area will be discouraged through symbolic fencing and education, it is not prohibited; however, intentional damage to fencing or property within the restoration area could result in warnings, fines or legal action, depending on the severity of the damage and the enforcement powers of the affected agency.

Will volleyball courts be affected?

The volleyball courts are not within the dune restoration area footprint and will not be affected.

Will access to the beach be impacted? What else will be restricted to protect the birds?

The symbolic fencing, as part of the mitigation plan, will not restrict access to the beach or other amenities. Instead, it will guide beachgoers from public street access points through the dune restoration areas to the beach.

Will dogs no longer be allowed on the beach?

USACE is not seeking to modify any existing rules regarding dogs on the beach. Management and enforcement of regulations concerning dogs and other animals will continue to be the responsibility of the relevant Ventura County agencies.

Where will trash cans be placed when dunes are constructed and posts and ropes installed around them?

The Ventura County Harbor Department is responsible for the placement and maintenance of trash cans. USACE has coordinated with the harbor department regarding the dune construction and symbolic fencing plan. The current plan ensures that the harbor department will relocate existing trash cans outside of the restoration footprint, in areas accessible to the public and for ease of maintenance, following the construction of dunes and the installation of symbolic fencing. The harbor department will continue to be responsible for ongoing maintenance of the trash cans in their relocated positions. The exact locations will be determined by the harbor department prior to construction commencement.

Herbicide Use

Contract W912PL25C0003, for maintenance dredging of the Channel Islands and Port Hueneme harbors, initially included a single restoration plan element: applying herbicide to well-established, non-native species within the existing dune complex. This herbicide application was never carried out. USACE subsequently issued a "stop work" order to the dredging contractor, preventing the herbicide application. USACE is modifying the dredging contract to permanently remove this element. Furthermore, USACE is revising the mitigation plan to prohibit all herbicide use.

Impacts on Homes

Will sand pile up against houses? Will there be space between dunes and the homes? How will this be maintained?

The distance between the established dunes and nearby houses will range from about 160 to 250 feet. Routine sand removal in front of homes on Hollywood Beach, managed by the Ventura County Harbor Department, will continue outside the restoration area and will not be affected by the dune restoration plan. USACE has coordinated with the harbor department to ensure these activities are not disrupted.

Will this project affect home values?

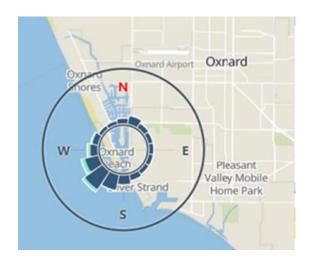
The dune restoration will not occur or encroach on private property. USACE cannot speculate on local residential real estate values based on our mitigation plan. The

appraisals necessary to make that evaluation are outside the scope of the mitigation plan and funding.

Wind Speed Data

Can USACE revisit the wind speed data?

The Hollywood Beach community raised concerns regarding the Channel Island Harbor wind rose (Figure 1) used in the draft mitigation plan. The screening of surrounding buildings can influence the readings from the single Channel Harbor wind station, leading to potentially inaccurate wind speed and direction data. To improve accuracy, a new wind rose was calculated using data from three stations: Channel Islands Harbor, Oxnard Airport and the offshore buoy in the Anacapa Passage (Figure 2). The new wind rose reveals a shift in the dominant prevailing wind direction from the southwest to the west-northwest, along with an increase in overall wind velocity. This improved three-station wind rose will be included in the revised mitigation plan.



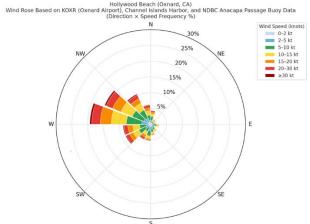


Figure 1. Channel Islands Harbor wind rose.

Figure 2. Three station combined wind rose for Hollywood Beach.

Will more accurate wind speed data change the plan?

The updated wind speed data is not expected to change the core design of the mitigation plan. The main purpose of the wind analysis was to confirm sufficient wind for dune development and to determine if dune fencing – semi-permeable fences used to encourage windblown sand to accumulate – would be needed for stabilization.

Observations of natural dune formation within temporary enclosures, along with

windblown sand around woody debris, confirm the proposed restoration areas have adequate wind for natural dune development. Therefore, USACE does not anticipate using dune fencing as a primary stabilization method. USACE's primary approach involves "preloading" the dune area with sand to initiate growth and using symbolic fencing to protect the developing dunes. Minimally intrusive, temporary measures, such as small stakes or straw plugs, remain part of the mitigation plan as potential adaptive management tools for additional stabilization as required.