

## MEMORANDUM

**To:** George Gabriel, City of Manhattan Beach  
**From:** Kristen Bogue, Michael Baker International  
**Date:** November 7, 2023  
**Subject:** Coyote Management and Response Plan – CEQA Exemption Memorandum

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This memorandum is intended to provide supporting documentation for Exemption under the California Environmental Quality Act (CEQA) Sections 15061(b)(3) and 15308 of the CEQA Guidelines (14 [California Code of Regulations] CCR §§15000 et seq.), with the City of Manhattan Beach (City) as the CEQA Lead Agency. The intent of the analysis is to document whether the project is eligible for exemption.

### **PROJECT LOCATION AND SETTING**

Manhattan Beach is located in the southwestern portion of Los Angeles County, approximately 19 miles southwest of downtown Los Angeles; refer to Exhibit 1, *Regional Vicinity*. Surrounding areas include the City of El Segundo to the north, the cities of Redondo Beach and Hawthorne to the east, the City of Hermosa Beach to the south, and the Pacific Ocean to the west; refer to Exhibit 2, *Site Vicinity*. Sepulveda Boulevard (State Route [SR]-1) bisects the center of the City in a north-south direction.

The City is characterized as highly urbanized with limited vacant land available for future new development. Currently, coyotes are present within and surrounding Manhattan Beach. Although the majority of land in the City is developed, areas where dense landscaping is prevalent (e.g., Manhattan Village parkways, Marriot golf course, Chevron refinery property, etc.) provide opportunities for coyotes to safely migrate, hunt for food, build dens, and reproduce. Additionally, prolonged drought has limited the availability of food sources for coyotes and thus has drawn coyotes to urbanized areas in search of food and water. Refer to Table 1, *Coyote Observations in Manhattan Beach*, and Exhibit 3, *Coyote Sightings*.

### **BACKGROUND**

In 2016, the City, along with other municipalities in Southern California, began to experience an increase in the amount of coyote encounters. While the City experienced only an increase in coyote sightings and the preying of free roaming feral cats in open and public areas, other municipalities reported encounters that included: 1) attacks on pets that were on and off leash; 2) a documented escalation of stalking and aggressive behavior displayed by coyotes; 3) an upsurge in sightings in areas populated by people (particularly during the day). In response, the City's

Police Department, Animal Control Division (Animal Control Division), began development of a coyote management plan in 2016 to address coyote management.

**Table 1  
 Coyote Observations in Manhattan Beach**

Interactions	2023 (partial <sup>3</sup> )	2022	2021	2020	2019	2018	2017	2016
<b>Attacks on humans:</b>	0	0	0	0	0	0	0	0
<b>Confirmed/observed predation:</b>	1	3	0	0	0	0	1 <sup>4</sup>	0
<b>Unconfirmed/possible predation:<sup>1</sup></b>	14	18	2 <sup>4</sup>	0	0	1 <sup>4</sup>	4 <sup>5</sup>	6 <sup>6</sup>
<b>Reported sightings (no attacks, only roaming area) to Animal Control:<sup>2</sup></b>	52	49	28	13	4	8	23	10
<b>TOTAL INTERACTIONS</b>	67	70	30	13	4	9	28	16

Notes:

1. Animals found already deceased and partially consumed, no witness or video to confirm animal was actually killed by a coyote. Coyotes may find and consume road kill or animals already deceased from other circumstances or causes.
2. It should be noted that these sightings may be duplicated; and thus, may be inflated with multiple reports of the same individual coyote.
3. Data for the year was collected between January and October 2023 and is documented through October 2023.
4. Confirmed predation species consisted of only domestic cat.
5. Confirmed predation species consisted of three domestic cats and one opossum.
6. Confirmed predation species consisted of five domestic cats and one opossum.

**PROJECT DESCRIPTION**

The proposed Coyote Management and Response Plan (herein referred to as the “Plan” or “project”) aims to establish a strategy for managing coyotes through a four-pronged approach:

- ***Public Outreach and Education:*** Incorporating education and coyote deterrents designed around co-existence. Communicating with the community including receiving and giving feedback of the plan.
- ***Active Monitoring and Data Collection:*** Tracking coyote observations that include confirmed coyote predations, unconfirmed coyote predations, and coyote sightings.
- ***Enhanced Coyote Deterrence Efforts:*** Decreasing the use of coyote attractants, increase pet safety, and reshape coyote behavior. Implementing hazing methods, preventative measures, and housekeeping to alter coyote behavior.
- ***Ensure Public Safety:*** Providing a safe environment for the public by limiting interactions with aggressive coyotes and potentially trapping where necessary to ensure public safety.

### **Active Monitoring and Data Collection**

The Plan would facilitate the gathering of specific data on incidents that would allow for targeting of educational campaigns and conflict mitigation efforts, as well as the ability to measure success in reducing conflict over time. Calls for service regarding coyote sightings and incidents would be monitored to identify human-coyote conflict hotspots.

### **Public Outreach and Education**

The Plan would facilitate communication between the general public, community leaders, and the City's Police Department to inform the public of applicable coyote activity. Updates on sightings/activity, seasonal coyote information, electronic flyers, and handouts may be distributed to participants. Specifically, materials would include handouts and contact information and resources for questions, comments, and concerns related to coyotes. Additionally, information would be provided regarding basic training on coyote background, ecology, and an overview of hazing examples of techniques. Members of the public who participate in hazing training programs would learn about coyote behavior to differentiate normal behavior versus abnormal behavior, and subsequently would be able to disseminate consistent messaging about coyote behavior to their community members. Information regarding behavioral change and hazing includes notifying pet owners that off-leash and unattended dogs and unattended outside cats attract coyotes; hazing programs be instituted and maintained on a regular basis; hazing be active for a sustained period to achieve the desired change for the highest possible long-term success; and hazing be monitored to assess its effectiveness and to determine if further action or more aggressive hazing is required.

### **Enhanced Coyote Deterrence Efforts**

The Plan encourages measures that residents can undertake to recognize and remove attractants including removal of food/trash, access to water and shelter, securing pets, and withholding from feeding feral/stray cats. The Plan also includes hazing methods which can alter coyote behavior to avoid human contact in an urban setting. Hazing, also known as "fear conditioning," is referred to as a training method that employs immediate use of deterrents to move an animal out of an area or discourage an undesirable behavior or activity.

Basic hazing consists of a person standing their ground, never ignoring or turning their back to a coyote, and yelling and making unpleasant and frightening noises until the animal chooses to leave. More aggressive hazing consists of approaching an animal quickly and aggressively, throwing safe projectiles, spraying with a hose or water gun, or creating fear of contact so the animal leaves the situation. Hazing should be conducted in a manner that allows the coyote to return to its normal habitat in a direction that would minimize harm to the animal. Hazing the animal in the direction of other houses and busy streets should be avoided. It should be noted that although hazing can help maintain a coyote's fear of humans and deter them from neighboring spaces such as backyards and play spaces, hazing should not damage coyotes, humans, or property.

## **Ensure Public Safety**

In accordance with the Plan, the City's Police Department would enforce State, county, and local laws pertaining to the feeding of wildlife including CCR Title 14, Section 251.1, *Harassment of Animals*; Los Angeles County Code Title 10, Section 10.84.010, *Providing Food for Certain Rodents or Predator Animals Prohibited*; and Manhattan Beach Municipal Code (Municipal Code) Section 9.68.020, *Public Nuisance*.

As depicted in Exhibit 4, Incident Response Table, a detailed five tiered response plan has been developed to provide a mechanism for identifying and classifying different levels of human and coyote interactions. As part of the Plan's incident response plan, the City's Animal Control Division would respond to any call which involves a sick or injured coyote or if there is a public safety issue (i.e., coyote threatening people or resting in an area frequented by people, such as a yard, park, playground, school, etc.). If a human is attacked and physically injured by a coyote, the City's Animal Control Division would work with the California Department of Fish and Wildlife (CDFW), which would be the lead investigating agency, to thoroughly investigate the incident, identify and potentially remove the coyote.

In the event of a provoked attack or a coyote attractant is present, the City's Animal Control Division would determine if circumstances indicate a continued threat to human safety. The City's Animal Control Division would determine an initial response which may range from targeted education up to contracting with a certified trapper or notifying CDFW of the need to potentially remove the involved animal.

If a coyote is removed by CDFW, the City's Animal Control Division would evaluate and determine what educational measures and hazing techniques need to be modified in order to decrease any reoccurrence. The assistance or guidance of coyote experts may be utilized.

## **EXEMPTION CRITERIA ANALYSIS**

Overall, the Plan would require City adoption of a Categorical Exemption for the purpose of complying with CEQA. 14 CCR § 15061(b)(3), exempts from environmental review actions where it can be seen with certainty that the same will not have a significant effect on the environment. 14 CCR Section 15308 exempts from environmental review activities aimed at assuring the "maintenance, restoration, enhancement, or protection of" the environment. The trap and removal contract presented for the City Council's consideration will not have a "significant" impact on the environment because this activity authorized by the same is intended to preserve the normal environmental balance of coyote aversion for humans, their pets, and their food. Indeed, the proposed vendor advises that a trap and removal program for targeted (i.e., aggressive or dangerous) coyotes reinforces this natural balance.

The project is also exempt under Section 15308, for actions taken by a regulatory agency as authorized by State law or local ordinance, to assure the maintenance, restoration, enhancement or protection of the environment where the regulatory process involves procedures for protection of the environment. In this case, the City is a regulatory agency, empowered by the police power under California law to take actions to protect the public health, safety, and welfare. Furthermore, human beings and their pets are part of the environment.

As defined in Section 15360 of the CEQA Guidelines, the “environment” includes both natural and man-made conditions. One such man-made condition is the existence of domesticated animals and the keeping of such animals as pets. Moreover, human beings are part of the environment and it is consistent with the purposes of CEQA to protect the health and safety of human beings, provide them with a “decent home and satisfying living environment,” and “create and maintain conditions under which man and nature can exist in productive harmony,” which includes and requires safety from coyote attacks. (See Public Resources Code Section 21000(d) and (g); Section 21001(e).) Additionally, the City has created a regulatory process through the proposed Plan to provide for the protection of humans and their pets.

### **EXCEPTIONS TO CATEGORICAL EXEMPTIONS ANALYSIS**

CEQA Guidelines Section 15300.2 lists the following exceptions to categorical exemptions:

- (a) **Location.** *Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*
- (b) **Cumulative Impact.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*
- (c) **Significant Effect.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*
- (d) **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*
- (e) **Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
- (f) **Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

This section evaluates the applicability of the exception criteria for a CE pursuant to CEQA Guidelines Sections 15300.2.

#### **EXCEPTION**

##### **CRITERION (a)**

**LOCATION.** *State CEQA Guidelines Section 15300.2(a) states that categorical exemption “Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where*

*designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.”*

The project is proposing a categorical exemption under Class 8 per Section 15308 of the CEQA Guidelines (14 [California Code of Regulations] CCR §§15000 et seq.) as well as the CEQA Section 15061(b)(3). Therefore, Exception Criterion (a) would not apply to the project.

**EXCEPTION**

**CRITERION (b)**      **CUMULATIVE IMPACT.**      *State CEQA Guidelines Section 15300.2(b) states that all categorical exemptions “are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.”*

The Plan aims to establish a strategy for managing coyotes specifically within the City of Manhattan Beach. The proposed strategies would not be applied to areas outside of the City’s municipal boundaries. No successive projects of the same type in the project vicinity are anticipated. Due to the nature of the project, the Plan would not have the ability to create cumulatively considerable environmental impacts. Therefore, potential cumulative impacts associated with successive projects and the proposed project are not anticipated, and Exception Criterion (b) would not apply to the project.

**EXCEPTION**

**CRITERION (c)**      **SIGNIFICANT EFFECT.** *State CEQA Guidelines Section 15300.2(c) states that a categorical exemption “shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.”*

The project would not result in any significant effects on the environment due to unusual circumstances. The Plan would not result in any physical affects on the environment, other than biological resources. However, as documented in the *Biological Resources Assessment for the Proposed Manhattan Beach Coyote Management and Response Plan Project – City of Manhattan Beach, County of Los Angeles, California* (Biological Resources Assessment), prepared by Michael Baker International, dated November 7, 2023 (refer to Attachment B, *Biological Resources Report*), the proposed project would result in less than significant impacts on biological resources. As such, Exception Criterion (c) would not apply to the project.

**a)      *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

Based on the Biological Resources Assessment, the coyote is not considered a special-status species. As such, implementation of the Plan would not have a direct impact on special-status species. Additionally, due to the relatively low number of observation records in the CDFW California Natural Diversity Database (CNDDDB) from within the City and lack of any records in the CNDDDB since 2010, special-status species are generally not expected to occur within the boundary of the City. As such, implementation of the Plan would not indirectly result in the



mortality or injury of special-status species, disturbances to their reproductive/breeding behaviors, or disturbances to the habitats preferred by these species, as these species are not present in the City. Implementation of the Plan would not have direct or indirect impacts to candidate, sensitive, or special-status species.

**b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

Direct or indirect impacts to riparian habitats and other sensitive natural communities would not occur with implementation of the Plan; such habitats are not expected to occur within the City. Although trimming vegetation to reduce hiding places and potential denning sites to eliminate coyote attractants is recommended in the Plan, it is expected that any vegetation trimming would be conducted by homeowners on private property. Further, should any trimming occur on public property, such activities would involve ornamental vegetation in a landscaped environment. Trimming ornamental vegetation is not considered a significant impact to a sensitive natural community. As a result, implementation of the Plan would have no direct or indirect impact on riparian habitats and other sensitive natural communities identified in any local or regional plan or policy, or regulated by CDFW, U.S. Fish and Wildlife Service, or any other regulatory agency.

**c) *Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

Direct or indirect impacts to protected wetlands and other aquatic features would not occur with implementation of the Plan. Further, with the exception of coastal areas, wetlands and other aquatic features do not occur within the City. As a result, implementation of the Plan would have no direct or indirect impact on federally and/or State protected wetlands and other aquatic features through direct removal, filling, hydrological interruption, or other means.

**d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

Significant direct or indirect impacts to native wildlife movement or access to nursery sites would not occur with implementation of the Plan. Wildlife linkages that provide movement opportunities for multiple species and native wildlife nursery sites are generally absent from the City, while corridors that provide movement opportunities for local populations are limited by the urbanized environment. Implementation of the Plan supports disruption of coyote movement and habituation within the City and encourages coyotes to seek shelter in other areas where the potential for human interactions is reduced. Modifying coyote movements into urbanized areas through implementation of the Plan's guidelines would not constitute a significant impact under CEQA, as guidelines implemented to change their movement patterns would occur over time and allow coyotes to establish alternative movement patterns that reduce the potential for human interactions. It is also anticipated that modifications to coyote movement over time would work to restore natural coyote behaviors and would not indirectly disrupt or impact the movement of other local native wildlife populations. As a result, implementation of the Plan would have a less than significant direct or indirect impact on movement of any native resident or migratory fish or wildlife

species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Trimming or clearing vegetation to reduce potential hiding places and denning sites for coyotes in the City is recommended by the Plan. Such activities could directly or indirectly impact nesting birds, which are protected under the federal Migratory Bird Treaty Act (MBTA) and under California Fish and Game Code (CFGF) Section 3503, which also protects impacts to all but a handful of bird species that may nest in California but are not native to our State. While it is impossible to accurately ascertain what impacts vegetation trimming by individual residents, certified tree contractors, or the City may have on nesting birds, wide-spread vegetation clearing activities are not anticipated under the Plan, but would be focused on areas that could become attractants to coyotes. Vegetation trimming or removal activities performed by certified tree contractors would be conditioned to adhere to standard industry guidelines to avoid trees that contain active bird nests and/or vegetation trimming or removal would be conditioned to be conducted outside the bird nesting season (the nesting season is generally considered to extend from February 1 through August 31, and as early as January 1 for raptor species). Trimming or clearing by individual private landowners on their properties is also not anticipated to be wide-spread and result in significant impacts to nesting birds. As a result, implementation of the Plan would have a less than significant direct or indirect impact on special-status plant and wildlife species, as well as on birds protected under the federal MBTA and CFGF.

**e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

Non-compliance with a local policy or ordinance protecting biological resources would result in a significant impact to the protected resource. Vegetation trimming by residents on private properties and by the City on public lands to remove potential coyote hiding and denning opportunities is not expected to conflict with the City's tree ordinance. In the unlikely event that removal or trimming of a protected tree is required to clear hiding/denning spaces for coyotes, compliance with the City's tree ordinance would reduce significant impacts to City-protected trees to less than significant levels. Further, implementation of trimming/thinning activities would not result in the removal of such trees. As a result, implementation of the Plan would not conflict with any local policy or ordinance protecting biological resources.

**f) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

Non-compliance with an approved Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or any other plan that provides species and habitat protections would result in a significant impact to resources protected under such plans. Since the City does not coincide with the boundaries of such plans, implementation of the Plan would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

Overall, implementation of the Plan is not expected to have a significant impact to biological resources pursuant to CEQA, and no mitigation measures are required. As such, the proposed



project would not introduce activities that would have a significant effect on the environment due to unusual circumstances. Therefore, Exception Criterion (c) would not apply.

**EXCEPTION**

**CRITERION (d)**

**SCENIC HIGHWAYS.** *State CEQA Guidelines Section 15300.2(d) states that a categorical exemption “shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.”*

Based on the California Department of Transportation’s *California Scenic Highway Mapping System*, there are no scenic highways within the City.<sup>1</sup> The closest officially designated or eligible State scenic highway is a segment of SR-1 located approximately 6.5 miles to the north. Given the distance of the City to SR-1 and nature of the Plan (i.e., no proposed development), the Plan would not result in any impacts to State scenic highways (including SR-1). As such, the Plan would have no impact on scenic resources within an eligible or designated State scenic highway and Exception Criterion (d) would not apply.

**EXCEPTION**

**CRITERION (e)**

**HAZARDOUS WASTE SITES.** *State CEQA Guidelines Section 15300.2(e) states that a categorical exemption “shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.”*

The Plan does not involve any development within the City. Rather, the Plan aims to establish a strategy for managing coyotes within the City’s municipal boundaries. As such, no development would occur on a site which is currently listed pursuant to Government Code Section 65962.5 (Cortese List) and Exception Criterion (e) would not apply to the Plan.<sup>2</sup>

**EXCEPTION**

**CRITERION (f)**

**HISTORICAL RESOURCES.** *State CEQA Guidelines Section 15300.2(f) states that a categorical exemption “shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.”*

The Plan does not involve any development within the City nor any grading activities. As such, the Plan would not result in a substantial adverse change in the significance of a historic resource and Exception Criterion (f) would not apply.

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<sup>1</sup> California Department of Transportation, California Scenic Highway Mapping System, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed August 10, 2023.

<sup>2</sup> California Environmental Protection Agency, *Cortese Listing*, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed August 10, 2023.

## **CONCLUSION**

Based on this analysis, the proposed project meets all criteria pursuant to Sections 15061(b)(3) and 15308 of the CEQA Guidelines (14 CCR §§15000 et seq.). Further, none of the exceptions to an exemption, listed pursuant to CEQA Guidelines Section 15300.2, apply to the proposed project.

## **REFERENCES**

California Department of Transportation, *California Scenic Highway Mapping System*, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed August 10, 2023.

California Environmental Protection Agency, *Cortese Listing*, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed August 10, 2023.

Michael Baker International, *Biological Resources Assessment for the Proposed Manhattan Beach Coyote Management and Response Plan Project – City of Manhattan Beach, County of Los Angeles, California*, November 7, 2023.

## **Attachments**

A – Exhibits


B – Biological Resources Report

**ATTACHMENT A**  
**Exhibits**



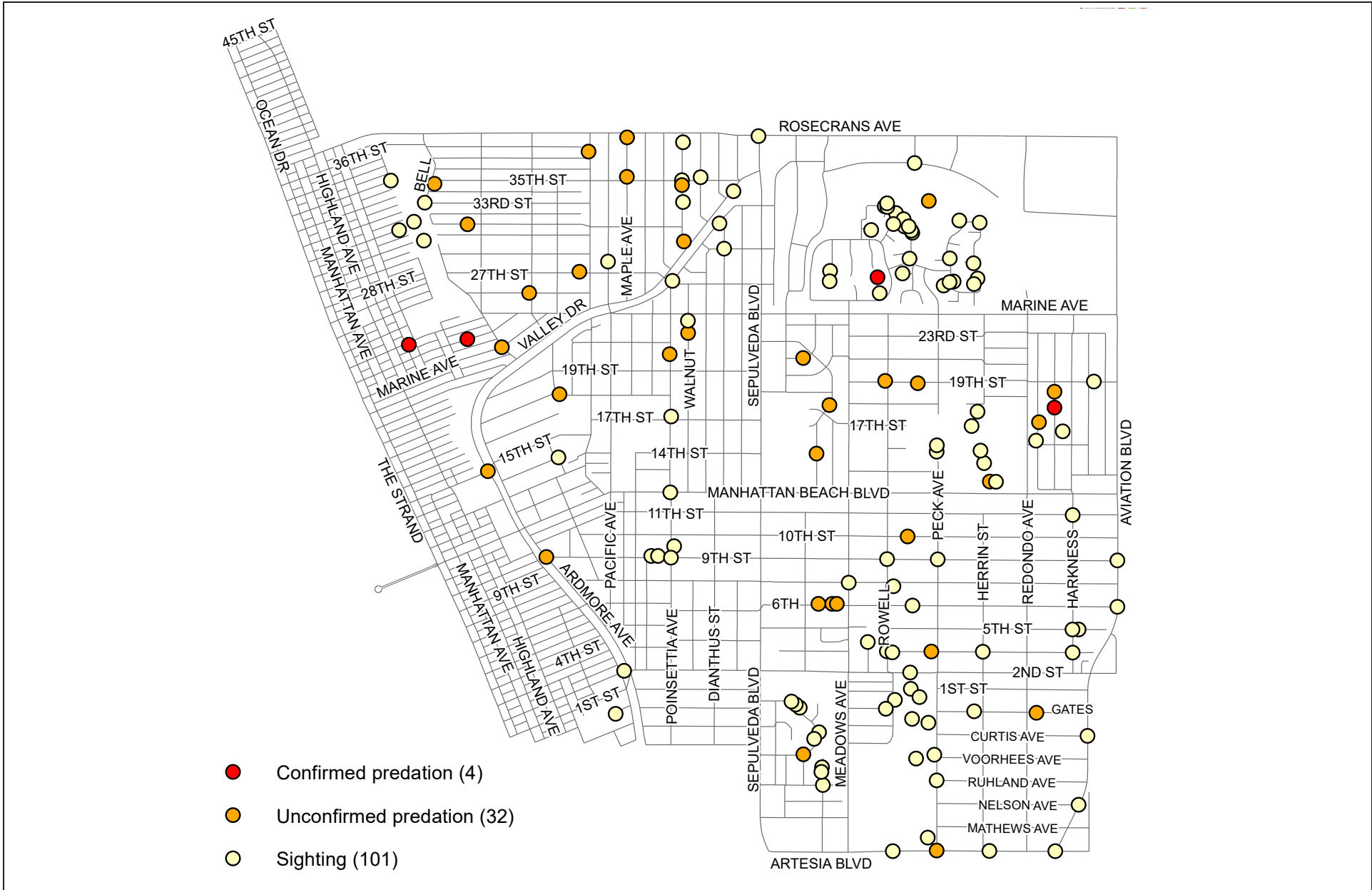




 CITY OF MANHATTAN BEACH MUNICIPAL BOUNDARY

Source: Google Earth Pro, August 2023





Source: City of Manhattan Beach, October 2023



COYOTE ACTION		RESPONSE/ACTION BY CITY	MITIGATION / RESOURCES / ENFORCEMENT
Heard (howling)	WHITE	Monitor coyote activity	Public education on typical coyote behavior
Seen moving or resting in public areas with no people or pets present			
Seen resting in public area with people present	GREEN	Monitor coyote behavior Report possible attractants Hazing if necessary	Pet safety information / Yard audit Remove possible attractants
Entering a private yard with or without unattended pets			
Entering private yard and injuring or killing unattended pet (with attractants present)			
Biting or injuring unattended free roaming pet or pet on leash longer than 6 feet (with attractants present)			
Following or approaching person with or without pet (Stalking / Shadowing)			
Entering private yard or home with people and pets present			
Entering private yard and injuring or killing unattended pet (without attractants present)			
Biting or injuring unattended free roaming pet or pet on leash longer than 6 feet (without attractants present)			
Biting or injuring attended pet	ORANGE	Attempt to identify and track responsible coyote. Monitor behavior and location. Report incident to California Department of Fish and Wildlife	Potential lethal removal or capture unless attack is provoked by human harassment pending investigation. Neighborhood Watch / social media alert
Aggressive, showing teeth, back fur raised, lunging, nipping w/o contact			
Biting or injuring person	RED	Report incident to California Department of Fish and Wildlife and L.A. Health Department	Coordinate with California Department of Fish and Wildlife; lethal removal or capture unless attack is provoked by human harassment.



**ATTACHMENT B**  
**Biological Resources Report**

November 7, 2023

JN 196498

**CITY OF MANHATTAN BEACH**

Attn: George Gabriel  
Assistant to the City Manager  
1400 Highland Avenue  
Manhattan Beach, CA 90266

**SUBJECT: Biological Resources Assessment for the Proposed Manhattan Beach Coyote Management and Response Plan Project – City of Manhattan Beach, County of Los Angeles, California**

Dear Mr. Gabriel:

Michael Baker International (Michael Baker) has prepared this technical letter report to support the Biological Resources analysis per the Appendix G, *Environmental Checklist Form*, of the *California Environmental Quality Act Statutes and Guidelines*, for the City of Manhattan Beach's proposed Coyote Management and Response Plan (Plan or project). The State of California Legislature enacted the California Environmental Quality Act (CEQA) in 1970 that requires public agencies to consider the environmental implications of proposed projects and disclose these findings to the public. The City of Manhattan Beach (City) will have the primary responsibility for implementing CEQA and making sure that its mandates are followed for this project.

**Project Location and Setting**

The City of Manhattan Beach (City) is located in the southwestern portion of Los Angeles County, approximately 19 miles southwest of downtown Los Angeles (refer to *Exhibit 1, Regional Vicinity* in Attachment A). Surrounding areas include the City of El Segundo to the north, the cities of Redondo Beach and Hawthorne to the east, the City of Hermosa Beach to the south, and the Pacific Ocean to the west (*Exhibit 2, Site Vicinity*, Attachment A). Sepulveda Boulevard (State Route [SR]-1) bisects the center of the City in a north-south direction.

The City is characterized as highly urbanized with no vacant land available. Currently, coyotes are present within and surrounding Manhattan Beach. Although the majority of land in the City is developed, areas where dense landscaping is prevalent (e.g., Manhattan Village parkways, Marriot golf course, Chevron refinery property, etc.) provide opportunities for coyotes to safely migrate, hunt for food, build dens, and reproduce. Additionally, prolonged drought has limited the availability of food sources for coyotes and thus has drawn coyotes to urbanized areas in search of food and water.

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## **Project Background**

In 2016, the City, along with other municipalities in Southern California, began to experience an increase in the amount of coyote encounters. While the City initially experienced only an increase in coyote sightings and the preying of free roaming feral cats in open and public areas, other municipalities reported encounters that included: 1) attacks on pets that were on and off leash; 2) a documented escalation of stalking and aggressive behavior displayed by coyotes; and 3) an upsurge in sightings in areas populated by people (particularly during the day). In response, the City's Police Department, Animal Control Division (Animal Control Division), began development of a coyote management plan in 2016 to address coyote management.

## **Project Description**

The proposed Plan aims to establish a strategy for managing coyotes through a four-pronged approach:

- *Public Outreach and Education*: Incorporating education and coyote deterrents designed around co-existence. Communicating with the community including receiving and giving feedback of the plan.
- *Active Monitoring and Data Collection*: Tracking coyote observations that include confirmed coyote predations, unconfirmed coyote predations, and coyote sightings.
- *Enhanced Coyote Deterrence Efforts*: Decreasing the use of coyote attractants, increase pet safety, and reshape coyote behavior. Implementing hazing methods, preventative measures, and housekeeping to alter coyote behavior.
- *Ensure Public Safety*: Providing a safe environment for the public by limiting interactions with aggressive coyotes and potentially trapping where necessary to ensure public safety.

### Active Monitoring and Data Collection

The Plan would facilitate the gathering of specific data on incidents that would allow for targeting of educational campaigns and conflict mitigation efforts, as well as the ability to measure success in reducing conflict over time. Calls for service regarding coyote sightings and incidents would be monitored to identify human-coyote conflict hotspots.

### Public Outreach and Education

The Plan would facilitate communication between the general public, community leaders, and the City's Police Department to inform the public of applicable coyote activity. Updates on sightings/activity, seasonal coyote information, electronic flyers, and handouts may be distributed to participants. Specifically, materials would include handouts and contact information and resources for questions, comments, and concerns related to coyotes. Additionally, information would be provided regarding basic training on coyote background, ecology, and an overview of hazing examples of techniques. Members of the public who participate in hazing training programs would learn about coyote behavior to differentiate normal behavior versus abnormal behavior, and subsequently will be able to disseminate consistent messaging about coyote behavior to their community members. Information regarding behavioral change and hazing includes notifying pet owners that off-leash and unattended dogs and unattended outside cats attract coyotes; hazing

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programs be instituted and maintained on a regular basis; hazing be active for a sustained period to achieve the desired change for the highest possible long-term success; and hazing be monitored to assess its effectiveness and to determine if further action or more aggressive hazing is required.

#### Enhanced Coyote Deterrence Efforts

The Plan encourages measures that residents can undertake to recognize and remove attractants including removal of food/trash, access to water and shelter, securing pets, and withholding from feeding feral/stray cats. The Plan also includes hazing methods which can alter coyote behavior to avoid human contact in an urban setting. Hazing, also known as “fear conditioning,” is referred to as a training method that employs immediate use of deterrents to move an animal out of an area or discourage an undesirable behavior or activity.

Basic hazing consists of a person standing their ground, never ignoring or turning their back to a coyote, and yelling and making unpleasant and frightening noises until the animal chooses to leave. More aggressive hazing consists of approaching an animal quickly and aggressively, throwing safe projectiles, spraying with a hose or water gun, or creating fear of contact so the animal leaves the situation. Hazing should be conducted in a manner that allows the coyote to return to its normal habitat in a direction that would minimize harm to the animal. Hazing the animal in the direction of other houses and busy streets should be avoided. It should be noted that although hazing can help maintain a coyote’s fear of humans and deter them from neighboring spaces such as backyards and play spaces, hazing should not damage coyotes, humans, or property.

#### Ensure Public Safety

In accordance with the Plan, the City’s Police Department would enforce State, county, and local laws pertaining to the feeding of wildlife including CCR Title 14, Section 251.1, *Harassment of Animals*; Los Angeles County Code Title 10, Section 10.84.010, *Providing Food for Certain Rodents or Predator Animals Prohibited*; and Manhattan Beach Municipal Code (Municipal Code) Section 9.68.020, *Public Nuisance*.

As depicted in the *Incident Response Table* included in the Plan, a detailed five-tiered response has been developed to provide a mechanism for identifying and classifying different levels of human and coyote interactions. As part of the Plan’s incident response plan, the City’s Animal Control Division would respond to any call which involves a sick or injured coyote or if there is a public safety issue (i.e., coyote threatening people or resting in an area frequented by people, such as a yard, park, playground, school, etc.). If a human is attacked and physically injured by a coyote, the City’s Animal Control Division would work with the California Department of Fish and Wildlife (CDFW), which would be the lead investigating agency, to thoroughly investigate the incident, identify and potentially remove the coyote.

In the event of a provoked attack or a coyote attractant is present, the City’s Animal Control Division would determine if circumstances indicate a continued threat to human safety. The City’s Animal Control Division would determine an initial response which may range from targeted education up to contracting with a certified trapper or notifying CDFW of the need to potentially remove the involved animal.

If a coyote is euthanized (upon trapping) by the City’s certified trapper or CDFW, the City’s Animal Control Division would evaluate and determine what educational measures and hazing techniques need to be modified in order to decrease any reoccurrence from other coyotes. The assistance or guidance of coyote experts may be utilized.

**Species Background in Manhattan Beach**

A general description of a coyote’s life history and its background and status in the City is provided in detail in the Plan. The City has tracked coyote observations within its boundaries since 2016, regularly providing updates on sightings, predation on pets, and attacks on humans. The most recent data collected by the City is presented in the table below.

**Coyote Observations in Manhattan Beach**

Interactions	2023 (partial <sup>3</sup> )	2022	2021	2020	2019	2018	2017	2016
<b>Attacks on humans:</b>	0	0	0	0	0	0	0	0
<b>Confirmed/observed predation:</b>	1	3	0	0	0	0	1 <sup>4</sup>	0
<b>Unconfirmed/possible predation:<sup>1</sup></b>	14	18	2 <sup>4</sup>	0	0	1 <sup>4</sup>	4 <sup>5</sup>	6 <sup>6</sup>
<b>Reported sightings (no attacks, only roaming area) to Animal Control:<sup>2</sup></b>	52	49	28	13	4	8	23	10
<b>TOTAL INTERACTIONS</b>	67	70	30	13	4	9	28	16

Notes:  
 1. Animals found already deceased and partially consumed, no witness or video to confirm animal was actually killed by a coyote. Coyotes may find and consume road kill or animals already deceased from other circumstances or causes.  
 2. It should be noted that these sightings may be duplicated, and thus, may be inflated with multiple reports of the same individual coyote.  
 3. Data for the year was collected between January and October 2023 and is documented through October 2023.  
 4. Confirmed predation species consisted of only domestic cat.  
 5. Confirmed predation species consisted of three domestic cats and one opossum.  
 6. Confirmed predation species consisted of five domestic cats and one opossum.

A graphic illustration of coyote sightings and predation activities is included within *Exhibit 3, Coyote Sightings* in Attachment A.

Coyote “packs” have migrated into the City from oil refinery properties to the north in El Segundo and from the City of Redondo Beach to the south (“Redondo Pack”). Both packs have primarily expanded into the eastern portion of the City, east of South Meadows Avenue, with a large concentration of sightings noted just northeast of the Polliwog Park/Manhattan Beach Middle School complex. Sightings west of South Meadows Avenue are concentrated in the northern portion of the City, near oil refinery properties that lie across the municipal boundary in El Segundo, and in the vicinity of Sand Dune Park. No sightings have been noted along coastline/beach areas of the City.



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## Legal Status

As a non-game mammal, coyotes are offered protection from take or possession by humans under Section 4150-4154 of the CFGC, although they may be taken/trapped/removed by CDFW or an authorized/certified contractor. Further, under California Code of Regulations, Title 14, Section 472(a), coyotes, as a non-game mammal, may be hunted with a valid hunting license within a legal place to hunt. Hunting mammals, even with a valid hunting license, is not allowed within the City limits. Coyotes are not considered a rare, endangered, threatened, or otherwise designated for conservation by federal, State, or City regulations.

## CEQA Thresholds Evaluation

The following provides an evaluation of the project's anticipated level of impact pursuant to the Biological Resources thresholds provided in the CEQA checklist.

- 1. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

### Existing Conditions

Species identified as candidate, sensitive, or special-status refers to plant and wildlife species that are listed by U.S. Fish and Wildlife Service (USFWS) under the federal Endangered Species Act and/or by CDFW under the California Endangered Species Act, or are proposed or candidates for listing; species that have been assigned a California Rare Plant Rank by the California Native Plant Society (CNPS); species designated as Fully Protected, Species of Special Concern, or Watch List by CDFW; or as a covered species under a local or regional natural community conservation plan or habitat conservation plan. Although, as presented above, coyote are provided some legal protection under CFGC and CCR, they are not considered a "special-status" species.

Michael Baker conducted a literature review of the CDFW California Natural Diversity Database (CNDDDB) (CDFW 2023) utilizing the online Rarefind 5 web application to identify the special-status species and natural vegetation communities that have been recorded for terrestrial species in the City. As existing coyotes are not typically found along coastal areas of the City, no impacts are anticipated in association with marine species. Michael Baker also searched the CNPS Inventory of Rare and Endangered Plants of California (CNPS 2023), the USFWS Information for Planning and Conservation (IPaC) environmental review tool (USFWS 2023a), and the online Calflora Database (Calflora 2023) to further identify special-status terrestrial species known from the City and surrounding communities.

Results of the CNDDDB search identified approximately 15 records of 10 different special-status species that have been documented within the boundary of the City. Most occurrence records are dated from 50 plus years ago, up to the most recent observation recorded in 2016 (see Attachment B). The natural habitats suitable to support special-status terrestrial plant and wildlife species are now generally absent. While coastline and in-land areas such as the Marriot golf course, Sand Dune Park, and the Polliwog Park/Manhattan Beach Middle School complex provide some open areas within the nearly completely developed City, the specific habitats requirements for special-status species are not provided within the

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City. Due to the relatively low number of observation records in the CNDDDB from within the City and lack of any records in the CNDDDB since 2010, special-status species are generally not expected to occur within the boundary of the City.

### Impact Analysis

Impacts on special-status species and their preferred habitats generally occurs during human activities in and around natural habitats that provide the specific habitat requirements required by special-status species. Significant direct impacts to special-status plant and wildlife species occurs when an individual is injured or killed, typically during construction activities, or if habitat suitable for special-status species is removed. Indirect impacts to special-status species can occur because of dust, noise, vibrations, stormwater runoff, and increased human presence. Such disturbances can result in changes in reproductive/breeding behaviors which could decrease breeding attempts and/or increase mortality of young due to abandonment or decreased feeding frequency. Such impacts would be considered significant.

Strategies proposed under the Plan include collecting data and monitoring coyotes, public outreach and education, employing hazing techniques when approached by a coyote, reducing features that attract coyotes to an area, enforcing laws pertaining to feeding wildlife, and as last resort, trapping and removal of a coyote in the event of an attack on a human.

### Direct Impacts

The coyote is not considered a special-status species. As such, implementation of the Plan would not have a direct impact on this species.

### Indirect Impacts

As discussed above, due to the relatively low number of observation records in the CNDDDB from within the City and lack of any records in the CNDDDB since 2010, special-status species are generally not expected to occur within the boundary of the City. As such, implementation of the Plan would not indirectly result in the mortality or injury of special-status species, disturbances to their reproductive/breeding behaviors, or disturbances to the habitats preferred by these species, as these species are not present in the City.

## **2. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?***

### Existing Conditions

Riparian habitat is the area of land that occurs along the edges of rivers, streams, lakes, and other water bodies. These areas differ from the surround upland areas because their soils and vegetation are influenced by the presence of water. Riparian habitat provides numerous ecological functions and values, in particular when composed of native plant species, it may provide habitat for special-status plant and wildlife species that are known from such habitats. Sensitive natural communities are those that are rare in California and are given the highest priority for conservation, provide suitable habitat for special-status species, or are aquatic jurisdictional features under federal and/or State agency regulation.

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No riparian habitat or sensitive natural communities were identified by the CNDDDB to occur within the City boundaries during the literature review. A review of aerial photography further confirms that riparian habitats and other sensitive natural vegetation communities are generally absent from the City. Some remnant natural habitat may occur within Sand Dune Park, but this open space is surrounded by development and is isolated from any other natural community.

An online review of the USFWS Critical Habitat Mapper (USFWS 2023b) indicates that Critical Habitat for the Western snowy plover (*Chradruis nivosus nivosus*; federally-listed threatened) has been designated along beach areas approximately 0.60 miles to the north in El Segundo and approximately 0.70 miles to the south in Hermosa Beach; no USFWS-designated Critical Habitat coincides with the City boundaries. In addition, no observations of this species are recorded in the CNDDDB along the City's coastline.

### Impact Analysis

Significant impacts to riparian habitats and other sensitive natural communities would occur during direct removal of such habitats, or indirectly as a result of dust, noise, vibrations, stormwater runoff, and increased human presence.

Direct or indirect impacts to riparian habitats and other sensitive natural communities would not occur with implementation of the Plan; such habitats are not expected to occur within the City. Although trimming vegetation to reduce hiding places and potential denning sites to eliminate coyote attractants is recommended in the Plan, it is expected that any vegetation trimming will be conducted by homeowners on private property or the City on public property to reduce attractants and would involve ornamental vegetation in a landscaped environment. Trimming ornamental vegetation is not considered a significant impact to a sensitive natural community. As a result, implementation of the Plan would have no direct or indirect impact on riparian habitats and other sensitive natural communities identified in any local or regional plan or policy, or regulated by CDFW, USFWS, or any other regulatory agency.

### ***3. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

#### Existing Conditions

An online review of the USFWS National Wetlands Inventory (NWI) (USFWS 2023c), topographic maps, aerial photography, and street maps was conducted to identify the presence of wetlands and other waters protected by federal and/or State regulations and falling under the jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, CDFW, and/or the California Coastal Commission. Any project activities conducted pursuant to federal and/or State environmental review and occurring in coastal areas may fall under the jurisdiction of all these and would require regulatory approvals for any direct and indirect impacts; however, no lakes, rivers, streams, wetlands, or other aquatic features that potentially fall under federal or State jurisdiction were identified within the City during the literature review. Water features in Polliwog Park and the Marriot golf course are ornamental, man-made features generally not regulated as jurisdictional features under federal or State agency regulation.

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### Impact Analysis

Significant impacts to federally and/or State-protected wetlands and other aquatic features would occur during any direct disturbance to such features, such as removal, filling, hydrological interruption, or other means. Indirect impacts would occur as a result of stormwater runoff and erosion into such features and increased human presence.

Direct or indirect impacts to protected wetlands and other aquatic features would not occur with implementation of the Plan. Further, with the exception of coastal areas, wetlands and other aquatic features do not occur within the City. As a result, implementation of the Plan would have no direct or indirect impact on federally and/or State protected wetlands and other aquatic features through direct removal, filling, hydrological interruption, or other means.

#### ***4. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

### Existing Conditions

Wildlife corridors and linkages are key features for wildlife movement between habitat patches. Corridors provide opportunities for individuals or local populations to conduct seasonal migrations, permanent dispersals, or diurnal dispersal, while linkages generally refer to broader areas that provide movement opportunities for multiple keystone/focal species or allow for propagation of biological processes (e.g., for movement of pollinators), often between areas of conserved land.

The City consists of a highly urbanized environment lacking wildlife linkages between conserved or open areas that provide valuable habitat for wildlife resting, feeding, and breeding. Significant corridors for movement of local wildlife populations within the City are also limited by the urbanized environment, providing limited opportunities for movement by wildlife populations. While coyotes likely utilize the same corridors to move around the City, utilizing primarily open areas, such as the Marriot golf course, City parks, Manhattan Village parkway, and oil refinery land, they are opportunistic and can adapt to disturbance from the surrounding environment to establish alternate corridors to move between areas for resting, feeding, and denning.

Wildlife nursery sites are limited within the urbanized City. Opportunities for local populations to breed and rear are likely limited to areas that support single breeding pairs. No nursery sites critical to native wildlife populations are known to occur within the City. As described in the Plan, areas with dense landscaping in the City and surrounding areas (i.e., golf course, parks, and parkway) provide breeding and rearing opportunities for coyotes.

### Impact Analysis

Significant impacts to native wildlife movement and access to nursery sites would occur during any direct disturbance to such features, such as by disrupting a movement linkage or corridor during construction of structures within or across such a feature. Indirect impacts to movement linkages or corridors would occur

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as a result of noise, vibrations, and human presence during construction of a project. Modifying or clearing vegetation to reduce the attractiveness of areas to coyotes, as recommended under the Plan, can also change the movement patterns of coyotes. However, this activity is intended to dissuade coyotes from becoming acclimated to an area and increasing the likelihood of regular human interactions encouraging them to migrate into other areas where human and pet interactions would be reduced.

Significant direct or indirect impacts to native wildlife movement or access to nursery sites would not occur with implementation of the Plan. Wildlife linkages that provide movement opportunities for multiple species and native wildlife nursery sites are generally absent from the City, while corridors that provide movement opportunities for local populations are limited by the urbanized environment. Implementation of the Plan supports disruption of coyote movement and habituation within the City and encourages coyotes to seek shelter in other areas where the potential for human interactions is reduced. Modifying coyote movements through implementation of the Plan's guidelines would not constitute a significant impact under CEQA, as guidelines implemented to change their movement patterns would occur over time and allow coyotes to establish alternative movement patterns that reduce the potential for human interactions. It is also anticipated that modifications to coyote movement over time would work to restore natural coyote behaviors and would not indirectly disrupt or impact the movement of other local native wildlife populations. As a result, implementation of the Plan would have a less than significant direct or indirect impact on movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Trimming or clearing vegetation to reduce potential hiding places and denning sites for coyotes in the City is recommended by the Plan. Such activities could directly or indirectly impact nesting birds, which are protected under the federal Migratory Bird Treaty Act (MBTA) and under California Fish and Game Code (CFGF) Section 3503, which also protects impacts to all but a handful of bird species that may nest in California but are not native to our State. While it is impossible to accurately ascertain what impacts vegetation trimming by individual residents, certified tree contractors, or the City may have on nesting birds, wide-spread vegetation clearing activities are not anticipated under the Plan, but would be focused on areas that could become attractants to coyotes. Vegetation trimming or removal activities performed by certified tree contractors would be conditioned to adhere to standard industry guidelines to avoid trees that contain active bird nests and/or vegetation trimming or removal would be conditioned to be conducted outside the bird nesting season (the nesting season is generally considered to extend from February 1 through August 31, and as early as January 1 for raptor species). Trimming or clearing by individual private landowners on their properties is also not anticipated to be wide-spread and result in significant impacts to nesting birds. As a result, implementation of the Plan would have a less than significant direct or indirect impact on special-status plant and wildlife species, as well as on birds protected under the federal MBTA and CFGF.

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**5. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

Existing Conditions

While the City does have goals and policies associated with protecting specimen trees, as well as a Tree Preservation Ordinance that provides a process to obtain permits for the removal of protected trees and guidelines for tree pruning, no other local policies or ordinances protecting biological resources are in place.

Impact Analysis

Non-compliance with a local policy or ordinance protecting biological resources would result in a significant impact to the protected resource. Vegetation trimming by residents on private properties and by the City on public lands to remove potential coyote hiding and denning opportunities is not expected to conflict with the City's tree ordinance. In the unlikely event that removal or trimming of a protected tree is required to clear hiding/denning spaces for coyotes, compliance with the City's tree ordinance would reduce significant impacts to City-protected trees to less than significant levels. Further, implementation of trimming/thinning activities would not result in the removal of such trees. As a result, implementation of the Plan would not conflict with any local policy or ordinance protecting biological resources.

**6. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

Existing Conditions

The City does not fall within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Impact Analysis

Non-compliance with an approved HCP, NCCP, or any other plan that provides species and habitat protections would result in a significant impact to resources protected under such plans. Since the City does not coincide with the boundaries of such plans, implementation of the Plan would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

**Conclusions**

Implementation of the Plan is expected to have no impact or less than significant impacts to biological resources pursuant to CEQA, and no mitigation measures are required.



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Please do not hesitate to contact me at (949) 472-3505 or [Arthur.Popp@mbakerintl.com](mailto:Arthur.Popp@mbakerintl.com) should you have any questions or require further information.

Sincerely,



Arthur Popp

Senior Biologist

Enc:

Attachment A Exhibits

Attachment B CNDDDB Results for the City of Manhattan Beach

Attachment C References

**Attachment A**


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Project Exhibits



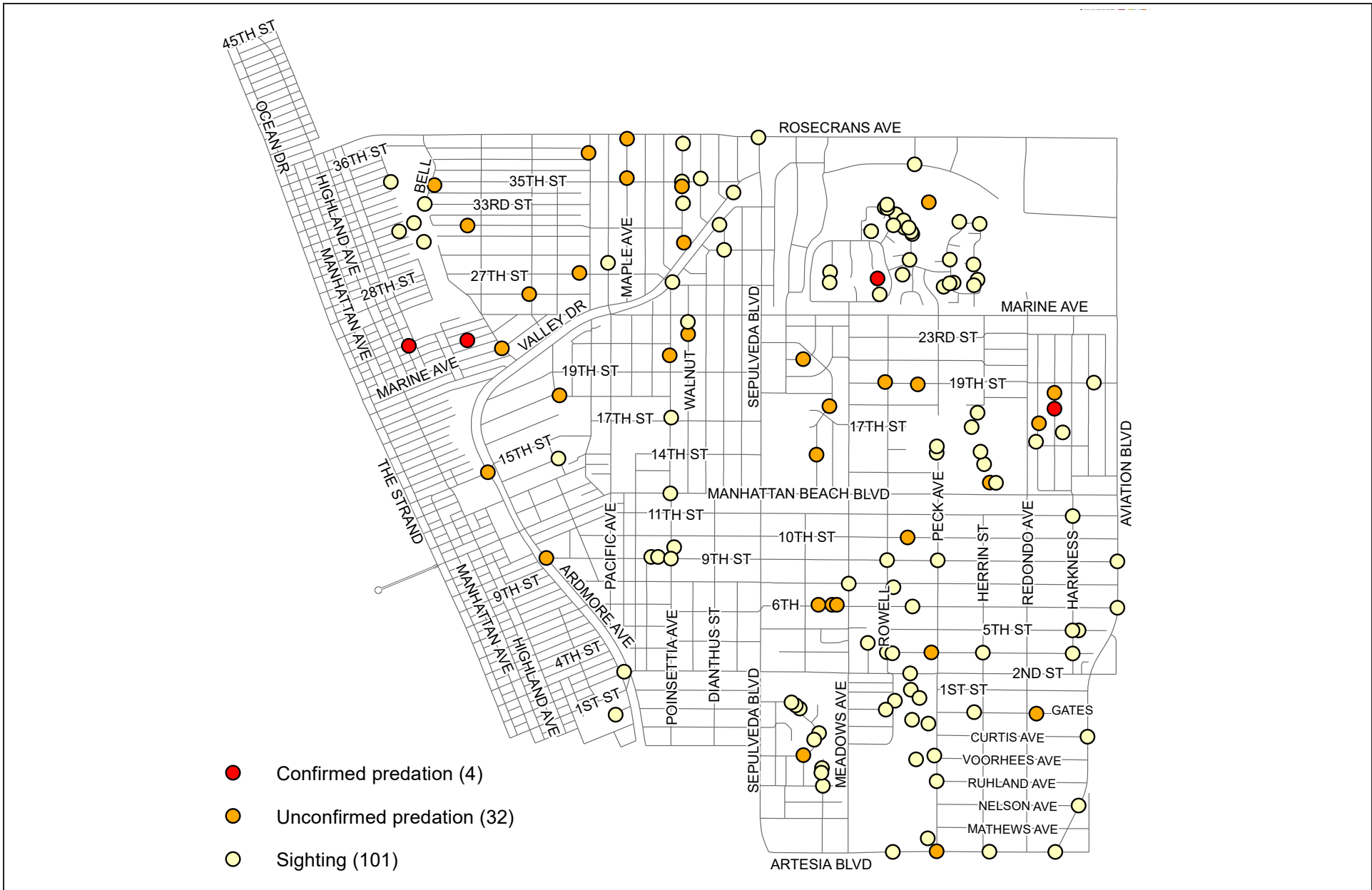




 CITY OF MANHATTAN BEACH MUNICIPAL BOUNDARY

Source: Google Earth Pro, August 2023





Source: City of Manhattan Beach, October 2023

**Attachment B**

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CNDDDB Results for the City of Manhattan Beach



Scientific Name	Common Name	Group	Federal Listing	California Listing	Rare Plant Rank	Other Status	Occurrence			Presence
							Number	Elment Date	Site Date	
<i>Anniella stebbinsi</i>	Southern California legless lizard	Reptiles	None	None	-	CDFW Species of Special Concern	51	19561024	19561024	Presumed Extant
<i>Anniella stebbinsi</i>	Southern California legless lizard	Reptiles	None	None	-	CDFW Species of Special Concern	52	20160629	20160629	Presumed Extant
<i>Anniella stebbinsi</i>	Southern California legless lizard	Reptiles	None	None	-	CDFW Species of Special Concern	53	19610304	19610304	Presumed Extant
<i>Anniella stebbinsi</i>	Southern California legless lizard	Reptiles	None	None	-	CDFW Species of Special Concern	54	19890315	19890315	Presumed Extant
<i>Bombus crotchii</i>	Crotch bumble bee	Insects	None	Candidate Endangered	-	-	165	19380706	19380706	Presumed Extant
<i>Bombus crotchii</i>	Crotch bumble bee	Insects	None	Candidate Endangered	-	-	166	19380710	19380710	Presumed Extant
<i>Brennania belkini</i>	Belkin's dune tabanid fly	Insects	None	None	-	-	4	194904XX	194904XX	Possibly Extirpated
<i>Chaenactis glabriuscula var. orcuttiana</i>	Orcutt's pincushion	Dicots	None	None	1B.1	-	20	20100513	20100513	Presumed Extant
<i>Chaenactis glabriuscula var. orcuttiana</i>	Orcutt's pincushion	Dicots	None	None	1B.1	-	36	20010513	20010513	Presumed Extant
<i>Cicindela senilis frosti</i>	senile tiger beetle	Insects	None	None	-	-	4	XXXXXXXX	1979XXXX	Extirpated
<i>Coturnicops noveboracensis</i>	yellow rail	Birds	None	None	-	CDFW Species of Special Concern	23	19981020	19981020	Presumed Extant
<i>Dithyrea maritima</i>	beach spectaclepod	Dicots	None	Threatened	1B.1	-	2	19020525	19980701	Extirpated
<i>Navarretia prostrata</i>	prostrate vernal pool navarretia	Dicots	None	None	1B.2	-	14	19440415	19440415	Possibly Extirpated
<i>Perognathus longimembris pacificus</i>	Pacific pocket mouse	Mammals	Endangered	None	-	CDFW Species of Special Concern	2	193806XX	193806XX	Extirpated
<i>Rhaphiomidas terminatus terminatus</i>	El Segundo flower-loving fly	Insects	None	None	-	-	1	200107XX	200107XX	Presumed Extant

## **Attachment C**

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References

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