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3827 Cesar Chavez St.  
San Francisco, CA 94131  
(415) 282-4752

Greg Baker, Program Manager  
Montrose Settlements Restoration Program  
501 W. Ocean Blvd., Suite 4470  
Long Beach, CA 90802

20 May 2005

Dear Mr. Baker:

As a volunteer for the Catalina Island Conservancy, I am distressed that your organization is planning to cut funding for the island's Bald Eagle Restoration program. As you may know Catalina is still reeling from the effects of DDT, and the recovery of our national bird is still precarious. The program simply needs more time, as there are promising signs that levels of DDT present in the bird's eggs are actually in decline. If you decide to pull your support this soon, all the previous years' efforts may very well be for naught.

I urge you to continue funding this important effort to bring back Catalina Island's Bald Eagle population.

Sincerely,



Scott Kravitz

DEPT. OF COMMERCE - NOAA  
RECEIVED  
MAY 25 2005  
OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES-SWR

May 20, 2005

Greg Baker, Program Manager  
Montrose Settlements Restoration Program  
501 W. Ocean Blvd., Suite 4470  
Long Beach, CA 90802.

DEPT. OF COUNTY OF SAN DIEGO  
REGISTRATION  
MAY 20 2005  
OFFICE OF THE COUNTY ATTORNEY  
NATURAL RESOURCES DIVISION  
COUNSEL

Dear Sirs:

I have been performing research on the islands of Southern California and the Baja California islands for the past 30 years. These are tremendously important islands and ecosystems, both terrestrial and marine. This region supports a broad diversity of marine animals and sea birds including at least seasonally a large pod of Blue Whales with up to 30 to 50 animals at a time. The islands are also critical breeding locations for a number of the seabirds that inhabit the region, several of which are not found elsewhere including a variety of storm petrels and the Xantus Murrelet, to name a few. I am familiar with the history of the California Brown Pelican as well and how it was affected by eggshell thinning. It is extremely disturbing to find that the levels of DDT in the marine environment in this region are still so high that the Bald Eagles are still unable to produce fully viable eggs that have not been weakened by thinning of the shells as a result of pesticide residue. Under these settlements, I believe that the main efforts for improving wildlife that was affected by the industrial toxins should be on the general seabird and fish populations rather than the Bald Eagles because it is important to ensure that their populations can be raised up and maintained at sustainable levels. For this reason, I support the Second or preferred alternative. While I feel that the conservation of the Bald Eagle in this region is important, I also appreciate that this alternative will provide for a reasonable level of conservation of the eagles.

I am sending this message of support for the Second alternative by E mail as well as by written mail.

Sincerely,



Thomas Oberbauer  
Chief of the Multiple Species Planning Division  
Department of Planning and Land Use  
County of San Diego

# Pacific Seabird Group



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DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

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May 20, 2005

Greg Baker  
Program Manager  
Montrose Settlements Restoration Program  
501 West Ocean Blvd. Suite 4470  
Long Beach, CA 90802

## **Re: Comments on Draft Restoration Plan/Environmental Impact Statement for Montrose Settlements**

Dear Mr. Baker:

On behalf of the Pacific Seabird Group (PSG), we offer the following comments on the Draft Restoration Plan/Programmatic Environmental Impact Statement ("Restoration Plan") that was issued in April 2005. The Restoration Plan will spend funds from the settlement of claims for damages to seabirds and other natural resources related to the dumping of DDTs and PCBs into Southern California coastal waters. PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin, including Canada, Mexico, Peru, Chile, Russia, Japan, South Korea, China, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. PSG has been involved with issues relating to the restoration of seabirds after human-caused disasters such as oil spills for decades.

In general, PSG is very supportive of the preferred alternative in the Restoration Plan. We would like to express some disappointment in the fact that of the \$140 million settlement (and which was increased by accrued interest), only \$38 million (e.g., about 25%) is available for restoration projects of any kind. Of the amount available for restoration projects, only \$13 million is available to restore birds and half of that seems to be devoted to restoring a single avian species, the Bald Eagle. We believe that it is in the public interest for the final Environmental Impact Statement to explain in some detail the dissipation of these funds which implies a breach of the fiduciary duty of the trustees to maximize the benefit to the injured resources.

DEPT. OF COMMERCE - NOAA  
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MAY 25 2005

OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES SWP

As discussed below, we support all of the seabird restoration projects in the Restoration Plan. We do question whether it is appropriate to devote \$6.2 million to a single species under the preferred alternative -- Bald Eagle restoration (and \$10 million under alternative 3) -- while devoting \$6.5 million under the preferred alternative (\$10 million under alternative 3) to 11 species of seabirds. We agree with the conclusion that after 25 years of attempts to restore Bald Eagle nesting on Santa Catalina Island it is unlikely that a self-sustaining population will be reached in the foreseeable future. The high residual levels of DDTs and PCBs in the diet of Bald Eagles there undoubtedly accounts for the abnormal eggs today. Continuing human intervention at every stage of breeding would be a squandering of precious restoration dollars (e.g., \$1.2 million since 2001). We doubt that the efforts to restore Bald Eagles in the Northern Channel Islands will fare much better.

Specifically, PSG endorses the following projects in the preferred alternative:

- Restoration of Ashy Storm-Petrels, Cassin's Auklets, Xantus' Murrelets, Western Gulls, Brandt's Cormorants, Pelagic Cormorants and Pigeon Guillemots to San Miguel Island, Channel Islands, by eradicating the black rats;
- Restoration of Cassin's Auklets and Xantus' Murrelets to Santa Barbara Island, Channel Islands, by social facilitation;
- Restoration of Western Gulls and Brandt's Cormorants to San Nicholas Island by eradicating feral cats;
- Restoration of Ashy Storm-Petrels, Cassin's Auklets, Xantus' Murrelets, California Brown Pelicans, Double-Crested Cormorants and Rhinoceros Auklets to Scorpion Rock (off Santa Cruz Island) by eradicating non-native vegetation and installing nest boxes;
- Restoration of Brandt's Cormorants, Double-Crested Cormorants, Pelagic Cormorants, California Brown Pelicans, Western Gulls, Cassin's Auklets, Ashy Storm-Petrels, Black Storm-Petrels and Xantus' Murrelets to Coronado and Todos Santos Islands, Baja California by social attraction and improving nesting habitat;
- Restoration of seabirds (Cassin's Auklets, Brandt's Cormorants, Xantus' Murrelets, Western Gulls) to Guadalupe Island, Baja California by eradicating feral cats;
- Restoration of California Brown Pelicans, Double-Crested Cormorants, Brandt's Cormorants, Cassin's Auklets and Xantus' Murrelets to San Jeronimo and San Martin Islands, Baja California by social attraction and improving nesting habitat; and
- Restoration of Cassin's Auklets, Brandt's Cormorants, Double-Crested Cormorants, California Brown Pelicans and Xantus' Murrelets to San Benito, Asunción and San Roque, Baja California by social attraction and improving nesting habitat.

PSG also endorses the following "alternative" projects in the preferred alternative:

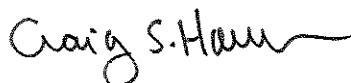
- Restoration of Ashy Storm-Petrels to Anacapa Island, Channel Islands, by social facilitation and nest boxes;
- Create/enhance Brown Pelican habitat on Southern California mainland; and
- Implementation of entanglement reduction and outreach program to protect Brown Pelicans in Southern California.

We believe that the three alternative seabird projects could easily be implemented if the trustees were to spend less on Bald Eagle restoration. We note that restoring Bald Eagles would likely undermine several of the seabird restoration projects that are designed to attract seabirds to nest on various Southern California islands because Bald Eagles will eat or harass seabirds. At a minimum, if the Bald Eagle restoration project does not show promising results within three years, the funds should be reprogrammed into the alternative seabird projects.

We applaud the trustees' decision to fund projects in Mexico that were affected by DDTs and PCBs in Southern California. There is ample precedent to spend restoration funds outside of the United States where circumstances warrant. Several years ago PSG supported the proposal and ultimate decision of the American Trader Oil Spill Trustee Council to restore a brown pelican colony in Baja, Mexico, that was affected by an oil spill in Southern California. In 2003, PSG supported the proposal and ultimate decision of the Command Oil Spill Trustee Council to restore a sooty shearwater colony in New Zealand that was affected by an oil spill near Monterey, California.

Thank you for the opportunity to comment on the Restoration Plan. We will gladly provide additional comments or expertise at your request.

Sincerely,



Craig S. Harrison  
Vice Chair for Conservation

cc: U.S. Senator Dianne Feinstein  
U.S. Senator Barbara Boxer  
Congresswoman Jane Harmon  
Congresswoman Christopher Cox  
Congressman Dana Rohrabacher  
Assembly Member Betty Karnette

# CARL J. LAMBERT

ATTORNEY AT LAW

2001 WILSHIRE BOULEVARD  
SUITE 505  
SANTA MONICA, CALIFORNIA 90403  
FAX: (310) 829-6288  
(310) 453-6030

May 24, 2005

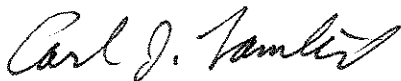
**Greg Baker, Program Manager**  
Montrose Settlements Restoration Program  
501 W. Ocean Blvd., Suite 4470  
Long Beach, CA 90802  
Re: Catalina Bald Eagles in Danger

DEPT. OF COMMERCE - NOAA  
RECEIVED  
MAY 25 2005  
OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES-SWR

Dear Mr. Baker,

On Sunday afternoon May 22, 2005 I observed this bald eagle on a branch at the shore of Santa Catalina Island. I was about 150 yards offshore and within an hour 12 kayakers went by, 2 sportfishing boats carrying 30 passengers each and an ocean echo rafting tour which stopped to look at this marvelous bald eagle. People also came in rental boats from Avalon harbor and saw the Eagle. The Eagle stayed in close proximity of man well over an hour. It is imperative that the Montrose Settlement funds be utilized to protect the Bald Eagles at Catalina. It is one of the few places in California where man can get so close to the eagles in an area where there is easy access and most importantly visibility. If you get into the mountains it is very difficult to view the eagles sitting in a tree. However, since Eagles naturally feed on fish they are near the water offering a great view of those passing by in boats.

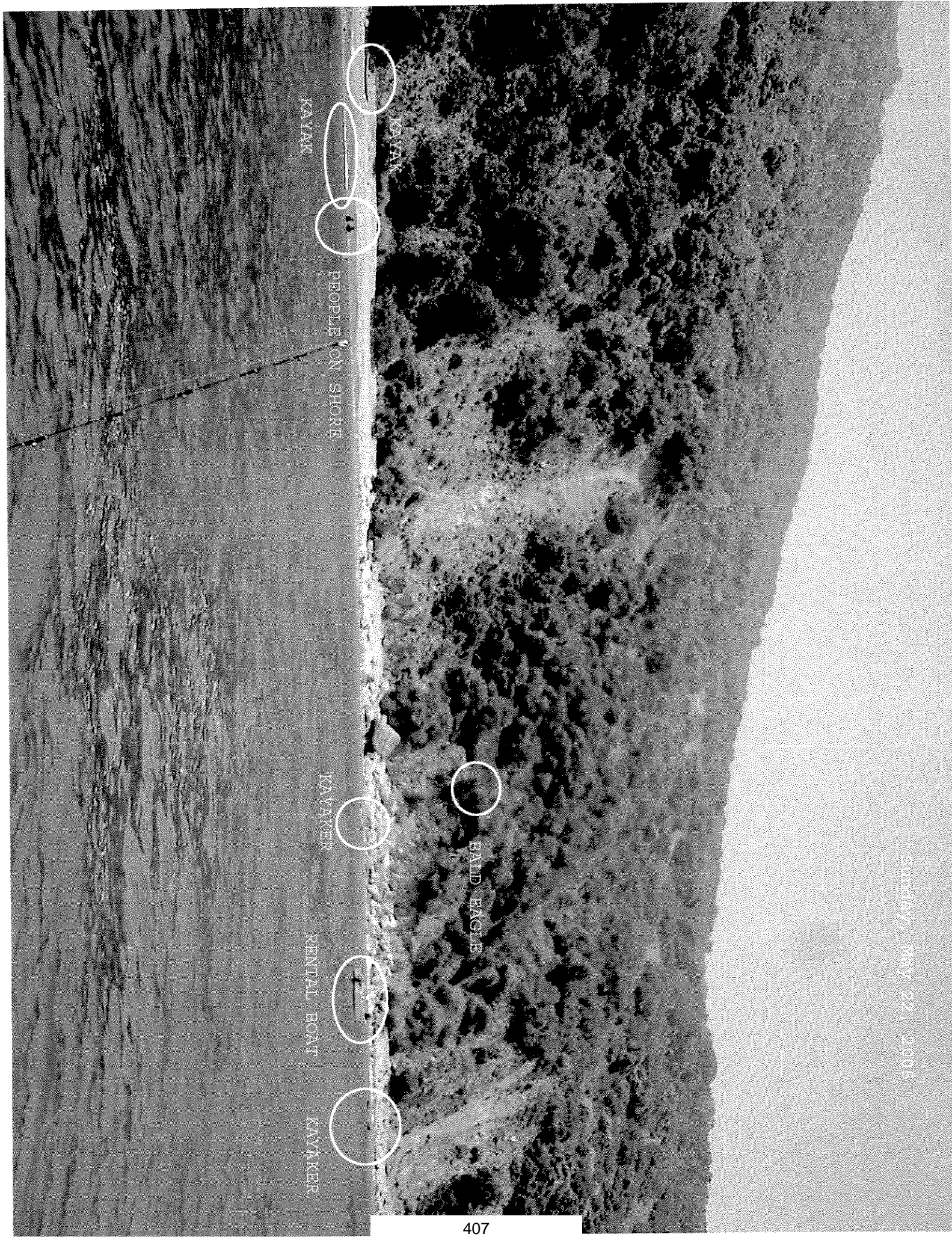
Very truly yours,



Carl J. Lambert  
Attorney at Law

*Greg,*  
Thanks for letting my  
Daughter and I speak at the Ventura Meeting.  
These pictures demonstrate my point that  
Bald Eagles are highly visible at Catalina  
Island. Please keep funding the hatchery  
program. T.A. " Carl

Sunday, May 22, 2005



KAYAK

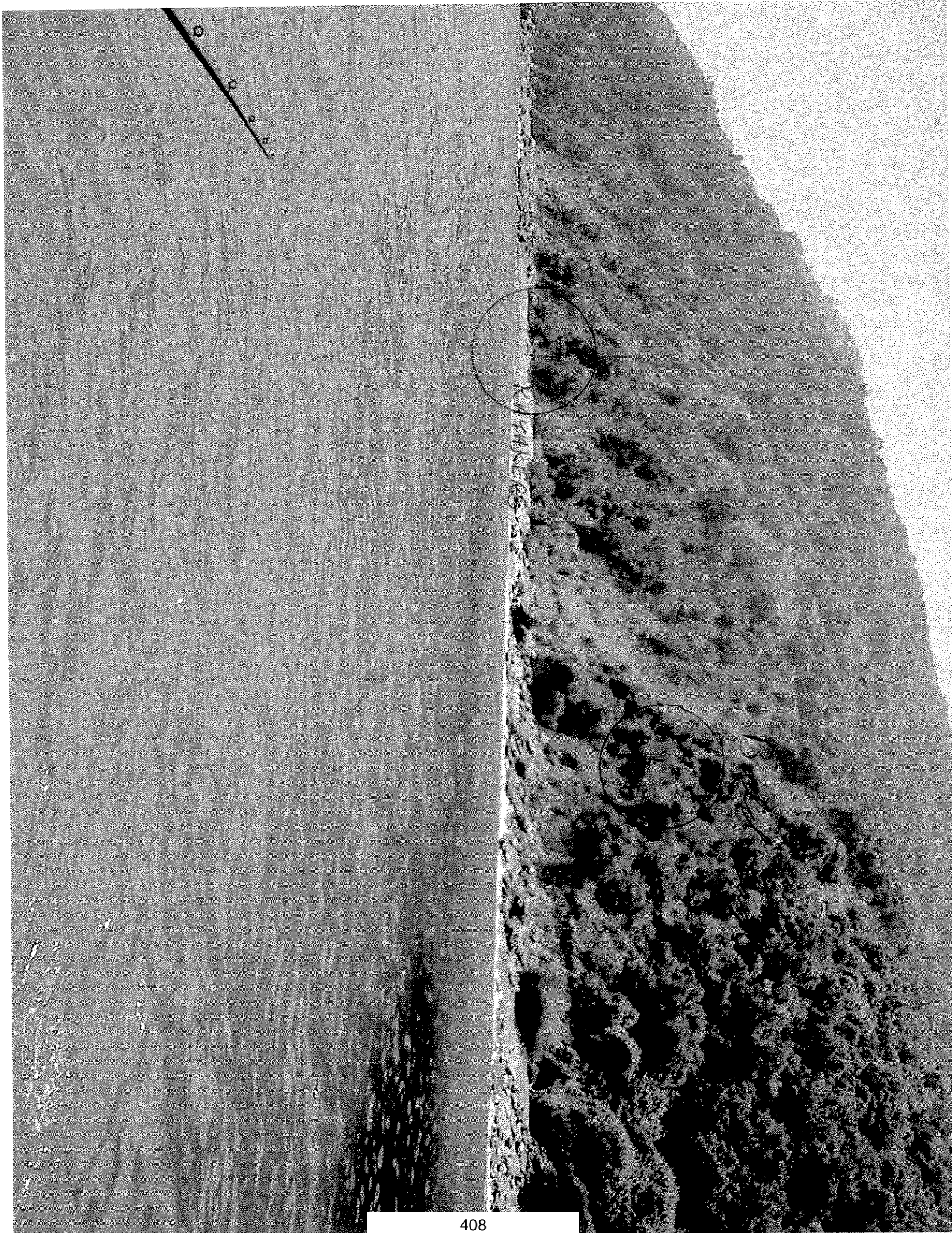
PEOPLE ON SHORE

KAYAKER

BALD EAGLE

RENTAL BOAT

KAYAKER

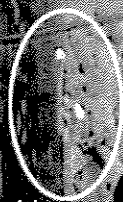




Sunday, May 22, 2005



BAIRD EAGLE



Kayaker



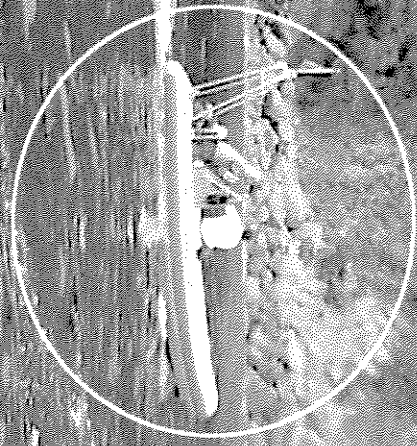
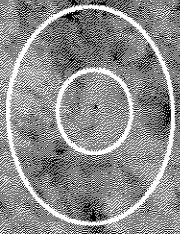
Sunday, May 22, 2005

Sportfishing Boat near  
Bald Eagle



Sunday, May 22, 2005

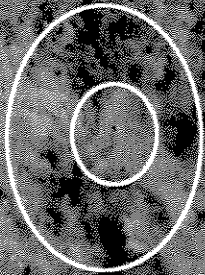
BALD EAGLE



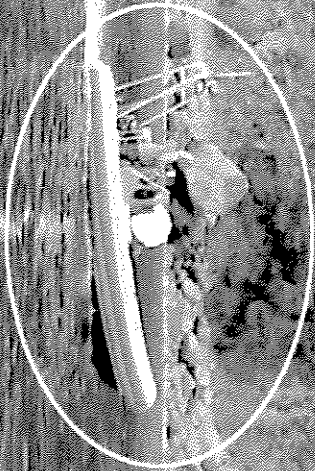
Ocean Echo Rafter

Sunday, May 22, 2005

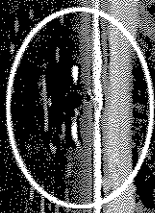
Bald Eagle



Ocean Echo Rafter



Kayaker



Sunday, May 22, 2005

KAYAKER

BALD EAGLE

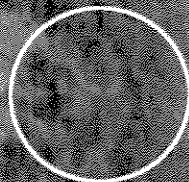
Sunday, May 22, 2005



BALD EAGLE

Rental Boat from Avalon

Sunday, May 22, 2005



BALD EAGLE



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

May 25, 2005

Mr. Greg Baker  
Program Manager  
Montrose Settlements Restoration Program  
501 W. Ocean Boulevard, Suite 4470  
Long Beach, CA 90803

Subject: EPA comments on the Montrose Settlements Restoration Program,  
Draft Restoration Plan and Programmatic Environmental Impact  
Statement/Report

Dear Mr. Baker:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS) pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

Based on our review, we are rating the Preferred Alternative (#2) as Environmental Concerns - Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). We have concerns that the direct and indirect impacts of the alternatives have not been sufficiently analyzed, especially with respect to the loss of bald eagle services and impacts to other threatened and endangered species. EPA also has concerns regarding the feasibility of the artificial reef projects and their inclusion in the alternatives at this time. We request additional information regarding the selection of evaluation criteria, cumulative impacts to injured resources, and impacts to endangered species.

EPA appreciates the opportunity to review the draft Restoration Plan prepared by the Montrose Settlements Restoration Program (MSRP). EPA commends the MSRP's efforts in collecting, compiling and distilling restoration ideas received from the public to restore injured natural resources and the services they provide in the Montrose case.

EPA has worked closely with the MSRP on a variety of activities related to the Palos Verdes Shelf Superfund site, including the joint implementation of the angler survey in 2002 and 2003 and the ongoing ocean fish contaminant study. EPA continues to coordinate with the MSRP on activities related to EPA's Remedial Investigation/Feasibility Study (RI/FS) and Institutional Controls (ICs) program and looks forward to working with MSRP in the future, especially on the proposed fishing/fish habitat restoration projects and the public outreach and education program.



We appreciate the opportunity to review this DEIS. When the Final EIS/EIR is released for public review, please send three copies to the address above (mail code: CED-2). If you have any questions, please contact me or Karen Vitulano, the lead reviewer for this project. Karen can be reached at 415-947-4178 or [vitulano.karen@epa.gov](mailto:vitulano.karen@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Nova Blazej', with a stylized flourish at the end.

Nova Blazej, Acting Manager  
Environmental Review Office  
Communities and Ecosystems Division

Enclosures:

EPA's Detailed Comments

Summary of EPA's Rating Definitions

cc: Guang-yu Wang, Santa Monica Bay Restoration Commission  
Tom Cota, Cal-EPA, Department of Toxic Substances Control

# SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

## ENVIRONMENTAL IMPACT OF THE ACTION

### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

## ADEQUACY OF THE IMPACT STATEMENT

### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

### **Potential Loss of Bald Eagle Services**

The Preferred Alternative (#2) funds bald eagle restoration in the Northern Channel Islands (NCI) only if bald eagles have demonstrated successful reproduction without human intervention and eliminates funding for the Santa Catalina Island Bald Eagle Program. Should the NCI study demonstrate that natural reproduction cannot occur, bald eagle ecosystem services in the Channel Islands will be lost.

The Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) states that the bald eagle, as top predator and scavenger, occupies a unique ecological role filled by no other species (p. 7-10, B-2). The Pacific Bald Eagle Recovery Plan indicates that the most suitable habitat for recovery of bald eagles in Southern California is on the Channel Islands (p. 3-45). EPA is concerned that the bald eagle, a major injured resource in the Montrose case, may not receive restoration under the preferred alternative. We are also concerned that the decision to cut funding of the Santa Catalina Program will occur at the end of 2005, before the results of the NCI study are available in 2007 or later.

Table 6-1 (p. 6-2) indicates that this Programmatic EIS/EIR constitutes a complete and final NEPA review for the bald eagle restoration actions. We are concerned that the selection of Alternative #2 now, which allows for disparate outcomes for bald eagle restoration, precludes further public input via the National Environmental Policy Act (NEPA) process and confuses the understanding of this alternative.

#### **Recommendation:**

Further evaluate the possibility of continued funding of the Santa Catalina Program until the results of the NCI study are known, so bald eagle services can continue during this interim period. Consider preparing subsequent NEPA documentation, tiered to this Programmatic EIS, which will allow for more meaningful public involvement once the ramifications of decisions regarding the fate of the bald eagle are clearer. Also, if preliminary data are available now from the ongoing NCI study, include these data in the Final EIS/EIR.

The DEIS/EIR states that the presence of bald eagles on the Channel Islands likely provides benefits to the endangered island fox by competing for territory with golden eagles who prey on the fox (p. 7-10). While this benefit is mentioned as an indirect impact, the impact of the loss of bald eagles and their ecosystem services, which is a possibility under the preferred alternative, is not evaluated in the analysis.

#### **Recommendation:**

In the evaluation of direct and indirect impacts of the alternatives (section 7.2), include

the impacts of the loss of bald eagle services in relation to the endangered island fox. Include more information, to the extent known, regarding the benefits of current bald eagle services on the island fox population. For example, provide data on the golden eagle population and indicate whether it is reasonably foreseeable that the island fox will experience negative impacts from the cessation of bald eagle restoration programs on the Channel Islands.

### **Alternatives Analysis Methodology**

The U.S. Department of Interior regulations (43 CFR Part 11) establish procedures and standards for natural resource restoration planning under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)<sup>1</sup>. In particular, 43 CFR Section 11.82 (d) *Factors to consider when selecting the alternative to pursue*, states that the “authorized official” shall evaluate each alternative based on all relevant considerations including ten specified factors: (1) technical feasibility; (2) the relationship between expected costs and benefits; (3) cost-effectiveness; (4) results of any planned or actual response actions; (5) the potential for additional injury resulting from the proposed action including long-term and indirect impacts; (6) the natural recovery period; (7) the ability of the resources to recover with or without alternative actions; (8) potential human health and safety impacts; (9) consistency with relevant state; federal or tribal policies; and (10) compliance with applicable federal, state and tribal laws.

The DEIS/EIR identifies these factors (p. 5-2) but does not integrate them into the analysis framework for comparing projects and alternatives. Instead, Tier 1 project evaluation criteria were: nexus of restoration action to injury, feasibility, and potential benefits to the resource and ecosystem, and Tier 2 criteria were: nexus, feasibility, resource and ecosystem benefits, environmental acceptability, and cost.

While we recognize the discretion of the “authorized official” in evaluating alternatives for restoration, we believe the use of Section 11.82(d) factors is appropriate for the comparison of restoration alternatives and should be incorporated into the analysis. In particular, factor #5, the potential for additional injury resulting from the proposed actions, should be considered because this factor requires consideration of “long-term and indirect impacts to the injured resources or other resources” (Section 11.82 (d)(5)).

#### **Recommendation:**

Integrate Section 11.82(d) factors more fully into the analysis methodology. If MSRP decides not to directly incorporate these factors in the comparison of the restoration projects and alternatives, provide more information on how the criteria were selected, including summaries of the conclusions from planning restoration workshops, as appropriate. Identify key assumptions utilized. For example, explain the desire to use restoration funds for actions that are sustainable in nature (p. 6-7), i.e., the preference for

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<sup>1</sup> 43 CFR Section 11.93(a) addresses preparation of the restoration plan and requires that the restoration plan be prepared in accordance with the guidance in Section 11.81. 43 CFR Section 11.81(b) requires the use of Section 11.82 provisions.

natural reproduction without human intervention, and explain how these assumptions were deemed appropriate in the context of the Montrose injuries. Include an explanation as to why the potential for additional injury was not deemed significant for inclusion in the evaluation criteria.

### **Endangered Species**

The DEIS/EIR states that for each project that is selected as preferred in the final Restoration Plan, the Trustees will evaluate the potential effects on listed species and critical habitat and will perform the appropriate level of consultation with the U.S. Fish and Wildlife Service and/or the National Oceanic and Atmospheric Administration (p. 8-4). The DEIS/EIR also states that conservation status was considered in determining the priority of seabirds for restoration (p. 5-4), but it is not clear whether effects from those projects on threatened and endangered species were also considered in the evaluation process. For example, the project to restore seabirds to San Miguel Island could potentially impact the endangered island fox (p. D1-8). By comparison, the project to restore seabirds to San Nicolas Island could benefit the endangered island fox, as well as the threatened island night lizard and snowy plover (p. D3-4).

In general, the analysis of the restoration alternatives would benefit from a clearer presentation of cause and effect relationships among affected species, perhaps in box arrow diagrams, so that potential impacts and benefits of the alternatives can be represented more clearly.

#### **Recommendation:**

In the Final EIS/EIR, include information regarding the direct and indirect impacts of the project alternatives on key endangered species. Provide more information on how the impacts to threatened and endangered species were considered in the initial set of project evaluation criteria or the final selection of the preferred alternative. Expand the impact analysis to make more explicit cause and effect relationships within the projects and alternatives.

### **Fishing and Fish Habitat Restoration Actions**

The artificial reef projects will receive additional NEPA analysis prior to implementation, including supplemental analysis, siting, design, and public and environmental review (p. 6-3). EPA encourages the MSRP to utilize the upcoming data from our joint ocean fish contaminant study to support the concept, design, siting and monitoring of the proposed artificial reef project. These data are expected to be available in late 2005. If the data finds that fish that would be attracted to the artificial reefs contain levels of contamination similar to those utilizing soft-bottom environments, this restoration measure would not be effective in restoring fishing services. As such, this information could substantially alter the project alternatives. We also recommend that future NEPA analyses for artificial reefs include an environmental justice component identifying benefits and impacts to subsistence fishers.

Recommendation:

Incorporate the data from the joint ocean fish contaminant study into the Final EIS/EIR. When these data are available, utilize the results in the assessment of the feasibility and design of artificial reef projects. EPA encourages the MSRP to coordinate with all appropriate parties to ensure that artificial reef projects result in providing: (1) cleaner fish, (2) fish species that the local anglers prefer to catch and consume, and (3) fishing opportunities that are equally accessible to all local anglers, with an emphasis on subsistence fishers.

### **Cumulative Impacts Analysis**

The cumulative impacts analysis in the DEIS/EIR includes the assessment of impacts from the proposed project along with other natural resource restoration, creation or enhancement efforts in the region (p. 7-24). The cumulative impacts analysis should also include potential adverse impacts to resources of concern from known projects in the Southern California Bight and associated areas. For example, if the ChevronTexaco liquefied natural gas facility is permitted for South Coronado Island, this will negatively impact seabirds (p. D5-16). Analyzing known and potential adverse impacts to injured resources in a larger context could potentially influence individual project/alternative selection.

Recommendation:

Expand the cumulative impacts analysis to include any known projects or other actions within the Southern California Bight and associated area that may adversely impact injured resources.

### **Future Funding Considerations**

Section 4.3 of the DEIS/EIR inaccurately summarizes the relevant provision of the Montrose Consent Decree for Offshore Matters. Paragraph 11.C of the Consent Decree establishes how the \$10 million “swing money” will be used. The DEIS/EIR states that should EPA ultimately make a decision not to pursue a cleanup action that requires the Department of Toxic Substances Control (DTSC) to operate a long-term maintenance program then the swing money would be paid to the Trustees (p. 4-14).

However, Paragraph 11.C of the Consent Decree provides that under certain conditions, swing money will be paid to the Trustees, *to DTSC or to EPA*. For example, if EPA selects an in-situ remedial action for the Palos Verdes Shelf but that action did not include an operation and maintenance (O&M) component, then the “swing money” would be paid to EPA consistent with the last sentence of Paragraph 11.C. Payment of the “swing money” to the Trustees would occur “in the event that EPA makes a response action selection determination to not select any in-situ response action (either in a Record of Decision which would not require operation and maintenance or in a Removal Action Memorandum).” (Montrose Consent Decree for Offshore Matters, Paragraph 11.C).

Recommendation:

In the Final EIS/EIR, modify statements that reference the swing money to accurately reflect the terms of the Montrose Consent Decree for Offshore Matters.

### Federal Clean Air Act

The project area, as noted on page 3-80, is classified as nonattainment for the National Ambient Air Quality Standards (NAAQS) for ozone and particulate matter less than 10 microns and 2.5 microns in diameter (PM10 and PM 2.5), and Los Angeles and Orange Counties are classified as nonattainment for carbon monoxide (CO). While the Draft EIS/EIR states that air quality impacts from any individual project would either be non-existent or minor (fugitive dust and construction vehicle emissions, p. 7-2), all Federal agencies are required by the Federal Clean Air Act (FCAA) to assure that actions conform to an approved air quality implementation plan. Future environmental documentation for the artificial reef or wetlands restoration projects will require discussion of general conformity requirements (Section 176(c) of the FCAA and 40 CFR Part 93) due to the construction activity that will occur and the area's non-attainment status.

Recommendation:

Include information in the Final EIS/EIR, *Section 8: Applicable Laws and Regulations*, detailing requirements of the Federal Clean Air Act and obligations for General Conformity determination.

### Miscellaneous

The Draft EIS/EIR states that the Trustees assembled three comprehensive restoration plan alternatives (p. 6-1, 7-3). We recommend changing this text to read "two comprehensive restoration plan alternatives and a no action alternative" or similar.

Both action alternatives include projects to restore birds to the Baja California Pacific Islands in Mexico. Appendix D5 includes a discussion of the jurisdictional and legal framework in Mexico, and a footnote in the Environmental Consequences Section of the Draft EIS/EIR indicates that these actions may be subject to the environmental review requirements of the Mexican government (p. 7-1). However, there is no mention of these requirements in Section 8, which lists key statutes, regulations and policies for the restoration program. We recommend including a brief discussion of applicable Mexican laws and regulations in Section 8, including applicable environmental review requirements.

**Milena Viljoen**

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**From:** Jacob Sheppard [jacob\_colin@yahoo.com]  
**Sent:** Thursday, May 19, 2005 1:29 PM  
**To:** msrp@noaa.gov  
**Subject:** Support letter for MSRP Alternative 2

To the trustees of the Montrose Settlements Restoration Program:

I am writing to lend my full support to dedicating Montrose settlement funds to restore damaged natural resources according to the outline of Alternative 2. Alternative 2 is an example of a carefully planned, scientifically sound disbursement of the limited money available for the conservation and restoration of sensitive and highly threatened marine habitat. I support this Alternative, the Preferred Alternative of the MSRP draft restoration plan, for three reasons:

- 1) It will provide crucial and otherwise sparse funding to restore seabird populations in habitat that has been dramatically degraded by decades of abuse by human activity. The tragedy of DDT and DDE poisoning in seabird populations is just one in a series of hits these animals have recently taken, including the introduction of invasive predators on their isolated island breeding grounds, the flood of plastics and other debris into the marine environment, entanglement in fishing lines and hooks and disturbance of their nocturnal habits by brightly lit fishing boats, offshore oil structures, and coastal development.
- 2) It will employ restoration techniques that have been proven to lead to significant and permanent increases in seabird numbers, and consequently, measurable benefits to the marine environment of the region. Social attraction, non-native predator elimination, and habitat enhancement are all tried-and-true conservation strategies that have already proven themselves valuable.
- 3) It recognizes the unfortunate need for restoration triage □ while the charismatic Bald Eagle is still struggling to regain a foothold in the Southern California Bight after sustaining nearly half a century of DDT and DDE poisoning, its prospects of beginning to thrive within the next half-century are low □ the levels of residual DDT in the environment are still too high to allow for a self-sustaining Bald Eagle population in the region. The cost of sustaining the population artificially, therefore, would outweigh the long-term conservation benefit especially when compared to the conservation benefit that would result from dedicating the same funding amount to proven seabird restoration techniques. The Bald Eagle is clearly still a candidate for restoration efforts, but the costly maintenance of an eagle hacking program in a habitat still known to contain high levels of DDT and DDE is simply not a wise use of conservation funding that is limited and uncertain. Such an effort would be much more likely to succeed if it were delayed until the contaminant levels in the area have decreased to levels amenable to Bald Eagle survival.

In summary, I urge you to support the preferred Alternative 2, the scientifically sound alternative with the greatest per capita restoration benefit.

With respect,

Jacob Sheppard

---

Do You Yahoo!?

5/19/2005



## Milena Viljoen

---

**From:** Marie Ferguson [tatazina@yahoo.com]  
**Sent:** Thursday, May 19, 2005 3:14 PM  
**To:** msrp@noaa.gov  
**Subject:** Montrose Restoration Project

To Whom It May Concern,

With respect to the distribution of funds/moneys for the Montrose Restoration project, I am in favor and support of alternative 2 for the following reasons:

- 1)Alternative 2 provides money to restore seabird populations to regions impacted by the Montrose DDT releases.
- 2)The seabird restoration actions proposed by the council are all techniques proven to result in increases in seabird populations.
- 3)These actions will result in permanent, long term and measurable benefits to seabirds- species that are important members of the marine and terrestrial ecosystems of the Southern California Bight.
- 4)These seabirds also are a significant part of local eco-tourism and provide wildlife viewing opportunities for large numbers of tourists and residents alike.

If you have any questions, please feel free to contact me via e-mail. Thank you!

Sincerely,  
Marie Ferguson

**Milena Viljoen**

---

**From:** Josh Donlan [cjd34@cornell.edu]

**Sent:** Sunday, May 22, 2005 3:07 PM

**To:** msrp@noaa.gov

Dear Montrose Trustees and Support Staff;

I have researched and published extensively on the ecology of island ecosystems including the islands off the Pacific Coast of the Baja California Peninsula, the Galapagos, Hawaii, Australia and California's Channel Islands. The long-term damage caused by the careless dumping of DDT by the Montrose company is an environmental tragedy. The settlement and subsequent draft restoration plan represent a huge opportunity to redress these wrongs. I commend you for the quality of the research and analysis that went into the draft restoration plan and lend my fullest support to the preferred option- number two. This is without doubt the most efficient use of the money presented and will have the biggest short-term and long-term conservation benefit for the resources impacted by the DDT spill. Removing introduced mammals from islands is, put simply, one of our most powerful conservation tools in stopping extinctions and restoring ecosystems.

Sincerely,

Josh Donlan

C. Josh Donlan  
Department of Ecology and Evolutionary Biology  
Corson Hall, Cornell University  
Ithaca, New York 14853  
Voice: 607.227.9768  
Voice: 607.254.4269  
Fax: 607.255.8088  
<http://www.eeb.cornell.edu/donlan/donlan.html>

6/6/2005

Paul & Cheryl Blevins  
P.O. Box 443  
Mesilla, N. M. 88046  
5-16-2005

Greg Baker, Program Manager  
Montrose Settlements Restoration Program  
501 W. Ocean Blvd., Suite 4470  
Long Beach, CA 90802

Dear Mr. Baker,

We would like to express our support for continuing funding for Catalina Island's bald eagle restoration, and to allocate Funding for saving the Peregrine Falcons on the island.

Though we live in New Mexico, we are quite familiar with the island and have visited Catalina together for over 20 years as a couple, and with our young children. Cheryl has visited Catalina for nearly 50 years, having spent much of her youth on the island.

So much hard work has been done to restore the bald eagles to the island, it would be a shame to let this good program fall through the cracks due to lack of funding.

There are a number of reasons to continue funding the bald eagle program on Catalina:

- The Montrose Settlement monies were meant to address mitigation measures for populations such as the bald eagles on Catalina that were impacted by years of DDT and PCBs.
- The reallocation of funds could lead to the disappearance of the bald eagles again from Catalina; undoing the many years of progress. Indeed, it could adversely affect the other Channel Islands if a healthy population of bald eagles is not assured in Catalina, where groundwork has already been in place.
- The Catalina Fox is a federally listed endangered species found no where else in the world. The abandonment of bald eagle restoration could put the fox population at risk. There is concern that the presence of bald eagles helps to deter golden eagle population formation. Golden eagles have decimated Northern Channel Islands fox populations. Abandoning Catalina bald eagle restoration may lay the path for the Catalina Fox to suffer the same fate as the Northern Channel Islands fox.
- Catalina Island is a place that is reasonably accessible to the public and offers the chance for a large number of people to be able to visit and enjoy bald eagles in a natural setting. The public education opportunities available in a place like Catalina cannot be overstated; the potential to reach schoolchildren, and everyday citizens exists on Catalina to an extent that does not exist in many other settings.

Though we support habitat restoration in other areas for ecosystems and fisheries, we feel it is too soon to abandon Catalina Island where so much progress has been made.

We hope you will reach an alternative that will continue to provide funds for bald eagle restoration work on Catalina for future generations to appreciate.

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JUN 06 2005

OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES-SWR

Sincerely,



Dear Mr. Baker,

I am one of the million-plus visitors or residents who, each year, enjoy the breathtaking beauty of the bald eagles of Catalina Island, restored with the help of funds from the Montrose Settlement for environmental damage caused by extensive DDT and PCB dumping through the 1970s. As you know, the alternative favored by the Montrose Natural Resource Trustees would cease funding of bald eagle restoration on Catalina Island, the only natural setting in Southern California that I can visit to enjoy these magnificent birds. Please do not reallocate Catalina funding to the Northern Channel Islands and Mexico, but designate Montrose Settlement moneys to Catalina efforts to continue bald eagle restoration, and also to begin peregrine falcon restoration and the restoration of marine fisheries on and near Catalina Island which was the Island most impacted by the dumping. Catalina Island is where this money will be spent most appropriately, and will best serve the public interest.

Sincerely yours,

Signature

Phone

Address

City, State, Zip

Also signed by 146 others

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MAY 15 1975  
OFFICE OF GENERAL CONSERVATION  
NATURAL RESOURCES DIVISION

*[Handwritten signature]*  
*5318 St. Mary St. #21*  
*LBC, CA 902*  
*(562) 884-4075*



# California Regional Water Quality Control Board

## Los Angeles Region



Dr. Alan Lloyd  
Secretary for  
Environmental  
Protection

Over 51 Years Serving Coastal Los Angeles and Ventura Counties  
Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.swrcb.ca.gov/rwqcb4>

Arnold Schwarzenegger  
Governor

May 31, 2005

Lisa Wolfe  
California Department of Fish and Game  
1700 K. Street, Suite 250  
Sacramento, CA 95814

RECEIVED BY  
JUN 06 2005  
OSPR - Legal

Dear Lisa Wolfe,

Re: CEQA Documentation for Project in the Ventura River Watershed

**Montrose Settlements Restoration Program (MSRP)**  
**SCH no. 2002031095**

We appreciate the opportunity to comment on the CEQA documentation for the above-mentioned project. For your information a list of permitting requirements and Regional Board Contacts is provided in Attachment A hereto.

The project site lies in the Ventura River Watershed that was listed as being impaired pursuant to Section 303 (d) of the Clean Water Act. Constituents causing impairment in the Ventura River watershed include algae, copper, selenium, silver, and zinc. The Los Angeles Regional Water Quality Control Board will be developing Total Maximum Daily Loads (TMDLs) for the watershed, but the proposed project is expected to proceed before applicable TMDLs are adopted. In the interim, the Regional Board must carefully evaluate the potential impacts of new projects that may discharge to impaired waterbodies.

Our review of your documentation shows that it does not include information on how this project will change the loading of these pollutants into the watershed. Please provide the following additional information for both the construction and operational phases of the project.

- For each constituent listed above, please provide an estimate of the concentration (ppb) and load (lbs/day) from non-point and point source discharges.
- Estimates of the amount of additional runoff generated by the project during wet and dry seasons.
- Estimate of the amount of increased or decreased percolation due to the project.

**California Environmental Protection Agency**



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

- Estimates of the net change in cubic feet per second of groundwater and surface water contributions under historic drought conditions (as compiled by local water purveyors, the Department of Water Resources, and others), and 10-year 50-year, and 100-year flood conditions.

If you have any questions please call me at (213) 576 6683.

Sincerely,



Elizabeth Erickson  
Associate Geologist, TMDL Unit  
Los Angeles Regional Water Quality Control Board

EE  
Attachments (1)  
cc:  
State Clearinghouse  
file

## ATTACHMENT A

- ✓ If the proposed project will result in a **discharge of dredge or fill into a surface water** (including a dry streambed), and is subject to a **federal license or permit**, the project may require a *Section 401 Water Quality Certification*, or waiver of Waste Discharge Requirements. For further information, please contact:

Valerie Carrillo, Nonpoint Source Unit at (213) 576-6759.

- ✓ If the project involves **inland disposal of nonhazardous contaminated soils and materials**, the proposed project may be subject to *Waste Discharge Requirements*. For further information, please contact:

Rodney Nelson, Landfills Unit, at (213) 620-6119

\*\*\*\*\*

- ✓ If the overall project area is **larger than five acres**, the proposed project may be subject to the State Board's *General Construction Activity Storm Water Permit*. For further information, please contact:

Tracy Woods, Statewide General Construction Activity Storm Water Permits at (213) 620-2095.

- ✓ If the project involves a facility that is proposing to discharge storm water associated with **industrial activity** (e.g., manufacturing, recycling and transportation facilities, etc.), the facility may be subject to the State Board's *General Industrial Activities Storm Water Permit*. For further information, please contact:

Kristie Chung, Statewide General Industrial Storm Water Permits at (213) 620-2283.

- ✓ If the proposed project involves requirements for new development and construction pertaining to **municipal storm water programs**, please contact:

Dan Radulescu, Municipal Storm Water Permits, Los Angeles County at (213) 620-2038;  
Jeff Mack, Municipal Storm Water Permits, Ventura County at (213) 620-2121.

- ✓ The proposed project also shall comply with the local regulations associated with the applicable **Regional Board stormwater permit**:

Los Angeles County and Co-permittees:  
NPDES No. CAS614001  
Waste Discharge Requirements Order No. 96-054.

Long Beach County and Co-permittees:  
NPDES CAS004003  
Waste Discharge Requirements Order No. 99-060.

Ventura County and Co-permittees:  
NPDES No. CAS004002  
Waste Discharge Requirements Order No. 00-108.

\*\*\*\*\*

- ✓ If the proposed project involves any construction and/or groundwater **dewatering to be discharged to surface waters**, the project may be subject to *NPDES/Waste Discharge Requirements*. For further information, please contact:

Augustine Anijelo, General Permitting and Special Projects Unit at (213) 576-6657(All Region 4 Watersheds).

- ✓ If the proposed project involves any construction and/or groundwater **dewatering to be discharged to land or groundwater**, the project may be subject to *Waste Discharge Requirements*. For further information, please contact:

Kwang-il Lee, Non-Chapter 15 Unit, at (213) 620-2269 (All Region 4 Watersheds).

## **DUPLICATES**

The following letters are exact duplicates of others received, either signed by different names, or sent in on separate letterhead. The 146 duplicates of the postcard (see above) are not included.





**Greg Baker, Program Manager**  
Montrose Settlements Restoration Program  
501 W. Ocean Blvd., Suite 4470  
Long Beach, CA 90802

May 18, 2005

Re: Habitat Restoration on Catalina Island

As a long time resident of Southern California and a frequent visitor to Catalina Island, I strongly urge you to continue your support of the Habitat Restoration on Catalina Island.

**Reasons to Continue Funding Catalina's Bald Eagle Restoration, and to Allocate Funding for Peregrine Falcons and Marine Fisheries Restoration**

- **Too Soon to Abandon Efforts** – According to IWS's current data, DDT levels are decreasing in the eggs of at least one pair of nesting eagles. This suggests that Catalina's bald eagles may soon be able to reproduce on their own, and it is simply too soon to abandon restoration efforts on Catalina.
- **Eagles Now Present May Leave** – It cannot be assumed that Catalina's current population of eagles would stay on the Island if they couldn't reproduce over the next few years; and, in fact, the reallocation of funds could mean the disappearance once again of bald eagles from Catalina. This could impact all of the Channel Islands.
- **Public Access to Eagles Should Be a Priority!** – With more than a million visitors each year, and as the only Channel Island with significant visitation, Catalina Island is the one place in Southern California that a significant number of people can visit to enjoy bald eagles in a natural setting. Since the Montrose Settlement was meant to restore this natural resource to the public, Catalina should be a priority where funding restoration efforts is concerned.

**Corporate/Retail Offices**

12544 Kirkham Court Suite 15 Poway, CA 92064  
ph. (858) 679-4682 info@insidesportfishing.com  
www.insidesportfishing.com

**Production Offices**

20950 Castle Rock Road Laguna Beach, CA 92651  
ph. 949.497.3031 fx. 949.376.0220  
insidesportfishing@cox.net

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MAY 23 2005

OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES-SWIR

- Settlement Monies Are Most Appropriately Used On and Near Catalina – Montrose Settlement monies were meant to address damage to natural resources such as bald eagles that were impacted by DDT and PCBs directly. They were not meant for addressing the impacts of introduced predators and invasive plant species that are now negatively impacting sea bird populations. The Trustees are proposing that as an alternative to funding the important bald eagle or peregrine falcon restoration work on Catalina, or fisheries restoration around Catalina, the monies be reallocated to fund bald eagle and marine restoration on the Northern Channel Islands and for the eradication of cats and rats, some of which would be done in Mexico. These locations are far from Catalina and the San Pedro Basin, the site of the greatest impacts. In order to meet stated goals of the Montrose Settlement, these funds should be applied in the areas of greatest impact, making Catalina Island and its surrounding waters the most appropriate site for use of Montrose Settlement funds.
- Catalina's Endangered Fox is at Risk – Abandoning bald eagle restoration on Catalina may put the Catalina Island fox population at risk. While much is unknown, it is possible that the presence of bald eagles on Catalina deters the formation of a golden eagle population. Golden eagles have decimated Island fox populations in the Northern Channel Islands. Discontinuing bald eagle restoration efforts on Catalina is simply too risky to the continued recovery of the Catalina Island fox, which is federally listed as an endangered species and is found on Catalina and nowhere else in the world.
- Catalina's Bald Eagles Fuel Recovery Elsewhere – The bald eagles that are being produced on Catalina Island are a potential source population for recovery of bald eagles on the Northern Channel Islands, and for the adjacent mainland.
- Catalina is the Most Cost-Effective Investment – An investment in Catalina's recovery efforts is an investment in a comprehensive eagle recovery effort which includes the human intervention still necessary to ensure reproduction, the protection and restoration of eagle habitat that is critical to the birds' survival on the Island, and, important educational outreach efforts that engender an appreciation of these magnificent birds and inspire the public to support their reestablishment and protection.
- Support the Catalina Bald Eagle Alternative – In their own plan, the Committee identifies an alternative that would use part of the settlement funds to support eagle restoration on Catalina in the long term. They would prefer, however, to spend the money on species in far-away places. Please ask that they create an alternative that continues to provide funds for bald eagle restoration work on Catalina, ensuring that these

magnificent birds will fly free for millions of Catalina visitors to enjoy today and throughout future generations.

- Support Habitat Restoration on Catalina Island – Bald eagles, peregrine falcons, and sea birds need a healthy ocean and island. The Committee also proposes to spend significant funds supporting research on fisheries in the recently designated Marine Protected Areas on the Northern Channel Islands. Catalina, the island hardest hit and most visited, should be considered for funding for its fisheries and ecosystems.

Sincerely,

A handwritten signature in black ink that reads "Michael D. Fowlkes". The signature is written in a cursive, flowing style with a prominent loop at the end of the last name.

Michael D. Fowlkes

Mr. Jack Berlin  
8311 Delgany Avenue  
Playa Del Rey, CA 90293

May 19, 2005

Greg Baker, Program Manager  
Montrose Settlements Restoration Program  
501 West Ocean Boulevard, Suite 4470  
Long Beach, CA 90802

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MAY 23 2005  
OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES-SWR

Dear Mr. Baker,

As one of the million-plus frequent visitors to Catalina, I, along with my family, enjoy the breathtaking beauty of the bald eagles that have been returned to the island.

As you know, these amazing creatures are endangered and have been restored with the help of funds from the Montrose Settlement which addressed environmental damage caused by extensive DDT and PCB dumping through the 1970s. Alternatives currently proposed by the Montrose Natural Resource Trustees would cease funding of bald eagle restoration on Catalina Island, the island hardest hit by this dumping and THE ONLY natural setting in Southern California that we can go to enjoy these magnificent birds.

PLEASE take action to influence Montrose Settlement Restoration Committee Members and Trustees that rather than allocate funding to the Northern Channel Islands and as far south as Mexico, their moneys are best spent on eagle restoration, efforts to help restore peregrine falcons and restoration of the marine fisheries on and near Catalina Island.

Public comment ends May 23<sup>rd</sup>. Please act before then. The favor of your reply regarding this important issue would be greatly appreciated.

Sincerely,



Program Manager Greg Baker  
Montrose Settlements Restoration Program  
501 W. Ocean Blvd., Suite 4470  
Long Beach, CA 90802

*RE: Catalina Island Restoration Program*

Dear Mr. Baker,

This letter is a sincere plea to continue funding Catalina's Bald Eagle restoration and allocate funding for Peregrine Falcons and Marine Fisheries restoration. There are many crucial issues at stake, some of which are as follows.

Abandoning your efforts now would hinder the abilities of the bald eagles to reproduce as their eggs still contain elevated DDT levels.

The disappearance of bald eagles from Catalina may occur if they are not able to reproduce over the next few years, which could impact all of the Channel Islands.

Over one Million visitors come to Catalina each year to enjoy the natural resources of the island including having access to bald eagles in a natural setting.

Damage from DDT and PCBs directly affected Catalina the worst. Settlement monies were not meant for addressing the impacts of introduced predators and invasive plant species.

The endangered Catalina Island Fox is federally listed as an endangered species and Catalina is the only place in the world where it is found. Abandoning the restoration program could allow Golden Eagles to decimate the Island Fox population.

The Bald Eagles that are being produced on Catalina Island are a potential source population for recovery of Bald Eagles elsewhere.

Catalina is the most cost-effective investment as the recovery effort includes the human intervention necessary to ensure the protection of the Eagle habitat and outreach efforts that inspire the public to support and protect the Eagles.

Please create an Alternative that continues to provide funds for Bald Eagle restoration work on Catalina, ensuring that these magnificent birds will fly free for millions of Catalina visitors to enjoy today and throughout future generations. Our children and grandchildren should have a right to view Bald Eagles too!

Sincerely,



Cheryl Morgan

Cc: Ann Muscat  
Mel Dinkle  
Catalina Island Conservancy

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MAY 23 2005

OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES-SWR

Program Manager Greg Baker  
Montrose Settlements Restoration Program  
501 W. Ocean Blvd., Suite 4470  
Long Beach, CA 90802

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Sincerely,



William Seals

Cc: Ann Muscat  
Mel Dinkle  
Catalina Island Conservancy

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MAY 23 2005  
OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES-SHR

Program Manager Greg Baker  
Montrose Settlements Restoration Program  
501 W. Ocean Blvd., Suite 4470  
Long Beach, CA 90802

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MAY 23 2005

OFFICE OF GENERAL COUNSEL  
NATURAL RESOURCES-SWR

*RE: Catalina Island Restoration Program*

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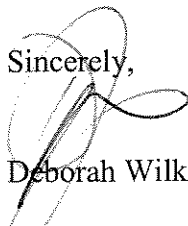
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Please create an Alternative that continues to provide funds for Bald Eagle restoration work on Catalina, ensuring that these magnificent birds will fly free for millions of Catalina visitors to enjoy today and throughout future generations. Our children and grandchildren should have a right to view Bald Eagles too!

Sincerely,



Deborah Wilkinson

Cc: Ann Muscat  
Mel Dinkle  
Catalina Island Conservancy