

The Steering Committee of the Wetlands Restoration Principles Coalition



February 1, 2018

Mr. Richard Brody
CDFW c/o ESA (jas)
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Daniel Swenson, Regulatory Division
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Sent Via E-mail to: BWERCcomments@wildlife.ca.gov and daniel.p.swenson@usace.army.mil

Dear Mr. Brody and Mr. Swenson:

The Wetlands Restoration Principles Coalition Steering Committee, made up of five leading environmental organizations in Southern California representing more than 25,000 members, has come together to support robust science-based restoration of the Ballona Wetlands Ecological Reserve. The undersigned Coalition organizations strongly support the restoration plans described in Phase 1 of Alternative 1, with various important amendments. The Steering Committee members determined that Phase 1 of Alternative 1 with amendments best achieves the nine restoration principles laid out by the Coalition in 2015 (see attachment). Coalition members are also submitting separate letters with individual comments on the various Alternatives.

We thank you for providing this analysis. This project will be the most important environmental restoration and public access project ever undertaken for the residents of Los Angeles County.

The 21st Century has brought good news for wetlands up and down the California coast. According to the California Coastal Conservancy, two hundred restoration projects have been completed and one hundred more are in progress for a total of 50,000 acres. Plus 50 more are privately financed as mitigation. They are all precious links along the Pacific Flyway, nurseries for the fish of the Pacific and its bays and estuaries, and the breeding ground for the various plants and animals that sustain the circle of life. It is far past time for the Ballona Wetlands to be restored. They are the largest wetlands between Point Mugu and Bolsa Chica, but have deteriorated to the point where they can no longer sustain vital functions.

In our comments below, the Coalition Steering Committee has addressed habitat and public access issues equally. There are obvious tensions between the goals of creating healthy, protected habitat and allowing human access, but we believe we have suggested good solutions to that problem in our comments. We support generous access points, bicycle and walking trails, and even an additional public access area not addressed explicitly in Alternative 1, Phase 1 but consistent with the project as described. We also have, however, designated areas where public access should be limited by the presence of endangered species and delicate portions of the new ecosystem. We think that well designed trails will also create the means to monitor the area and protect it from illicit activity.

Human needs and nature's needs have been severely unbalanced for over 100 years, with humans the dominant species. We believe a robust restoration at Ballona will restore nature's balance to the ultimate benefit of residents and visitors who will come to understand and enjoy this beautiful place between land and sea.

As the Draft Environmental Impact Report/Statement (EIR/S) succinctly summarizes:

"The California Department of Fish and Wildlife (CDFW) proposes a large-scale restoration that would entail enhancing and establishing native coastal aquatic and upland habitats within the Ballona Reserve. The proposal is intended to return the daily ebb and flow of tidal waters where practically feasible to achieve predominantly estuarine conditions, maintain freshwater conditions, and enhance physical and biological functions within the Ballona Reserve."

While supporting the overall goals of the Draft EIR/S, the Coalition Steering Committee also supports the following objectives for the Reserve as a whole:

1. Protect, optimize, enhance and create diverse habitats for native plants and wildlife throughout Ballona including wetland, riparian, dune and upland environments.
2. Maximize and enhance wetland acreage and function. Also maximize diversity of created/restored wetland habitats, i.e. low, mid, and high marshes, salt pan, and brackish marsh.
3. Increase watershed connectivity.
4. Create nurseries for fish and nesting habitat for birds.
5. Manage for rare and sensitive species.
6. Create well-regulated trails for public access and educational opportunities that are compatible with ecological goals.
7. Ensure long-term RESILIENCE and sustainability with estimated future sea level rise.
8. Reduce habitat fragmentation by providing wildlife travel corridors to minimize wildlife injury and mortality from vehicles.
9. Safeguard wildlife and minimize losses during construction.
10. Provide safe public access to the Reserve including trails, bike paths and rest stops, overlooks, wayfinding, shade structures, information kiosks, restrooms, drinking water, public transit stops and parking.

To the extent that the Draft EIR/S supports these objectives, **the Wetlands Restoration Principles Steering Committee supports a Project with the following elements including the amendments and safeguards and as generally mapped in the drawings attached:**

Area A: We support the restoration of Area A presented in Alternative 1 Phase 1 with a few minor changes. The 14 feet of fill covering Area A should largely be removed and the existing levees should be replaced with new perimeter levees as described. We support a public access system with separate bicycle and walking trails as shown in Alternative 1 Phase 1. We support a trailhead at a parking structure with adequate visitor-serving parking and restrooms for the numbers of visitors that are anticipated to be attracted to the new Ballona public access system.

Our support for this Alternative is based upon the inclusion of the following changes and additions:

1. Survey for rare and sensitive plants and animals and plan for their relocation before removing topsoil.
2. Include a plan for relocating wildlife displaced by restoration activities.
3. Ensure that topography allows for vegetated wetlands to thrive and provide increased water filtration capabilities, while also supporting a diversity of wetland habitats, i.e. low, mid, and high marshes, salt pan, and brackish marsh.
4. Ensure that there is adequate nesting and foraging habitat for the Belding's Savannah Sparrow.
 - a. Pickleweed habitat cover in Area A should be equal to or greater than currently present in West Area B.

- b. Use principles of Minimum Viable Population to estimate the number of nesting pairs required for a viable, sustainable population size and ensure that the population will be protected from future disturbances.
 - c. Provision of the appropriate wetlands vegetation habitat is very important as it is possible that West Area B will be inundated due to sea level rise.
- 5. Align primary trailhead and trails with visitor services and parking.
- 6. Provide a plan for the likely placement of interpretive panels along walking paths, viewing platforms, etc. that are compatible with restoration goals and maximize interpretive opportunities for schools.
- 7. Ensure that the number of parking spaces provided is adequate for the expected number of visitors to the Reserve.¹ A parking study should determine the correct number of spaces for the anticipated number of visitors to the Reserve. The study should address the need for time limits to reduce unintended parking uses and alternative transportation options.
- 8. Include bathroom facilities at the primary trailhead in Area A comparable to those at the Upper Newport Back Bay Nature Preserve. Bathrooms are critical to encourage visitors to use proper facilities by increasing convenience. The type of structure should be determined based on budget, operations, and maintenance plans for the site.
- 9. Create wildlife corridors. Provide more details on bridge design and vegetation. Safe travel corridors over roads are needed not only for people, but also wildlife to help reduce habitat fragmentation and roadkill. Use known principles of wildlife corridor design to determine the cover and type of native vegetation needed.
- 10. Address more directly how upstream water quality improvement projects are compatible with the restoration goals for water quality and sediment loads. Provide more information about how the project design will handle changes, including in terms of the extent of monitoring that will occur. While we recognize that much of the Ballona Creek Watershed is beyond the scope of the restoration project, it is reasonably foreseeable that the timing, scope and overall approach of projects and planning efforts happening upstream to address environmental concerns, including the Ballona Creek Bacteria TMDL Project and Ballona Creek Enhanced Watershed Management Program, will affect water quality and sediment loading downstream. We strongly recommend a cumulative impacts and sensitivity discussion to disclose the impacts, both positive and negative, of upstream projects on the project site.

Area C: We support the plans for Area C presented in Alternative 1 Phase 1 with a few minor changes. We support the restoration of native upland vegetation where mostly weeds now exist, as well as the addition of walking trails, one major trailhead with parking, and several secondary trailheads. We believe the walking trails will reduce crime and homeless encampments by enhancing the area with greater visibility, law enforcement, and passive recreational opportunities.

Our support for this Alternative is based upon the inclusion of the following changes and additions:

- 1. Survey for rare and sensitive plants and animals and plan for their relocation before depositing fill.
- 2. Create a viewing area in South Area C overlooking the Centinela Creek convergence with Ballona Creek for birding. Consider adding benches and scopes for people to view the birds in this area.
- 3. Create wildlife corridors. Provide more details on bridge design and vegetation. Safe travel corridors over roads are needed not only for people, but also wildlife to help reduce habitat fragmentation and roadkill. Use known principles of wildlife corridor design to determine the cover and type of native vegetation needed.

If the Little League baseball fields remain inside the reserve, then the following changes should be made to their management:

- 1. The fields, parking lots and surrounding grounds must be maintained, to encourage environmental stewardship.

¹ In their report, Standards for Outdoor Recreation Areas (<https://www.planning.org/pas/reports/report194.htm>), the American Planning Association outlines basic standards for amenities at public facilities.

2. Access should be open to the larger community throughout the year, and parking should be allowed on the lot for visitors to Area C walking trails.
3. Prevent negative environmental and community impacts by increasing patrols by enforcement agencies.
4. Restore as much of the existing area as possible to native uplands vegetation.

North Area B: We support the removal of the levee wall in North Area B as described in Alternative 1 Phase 1 and the addition of a meander to the creek in this area. We also support enhancing public access along the roads in North Area B with walking and biking trails on the new levee paralleling Culver Blvd. and joining with the existing levee wall further to the west where the tide gates are located. We also support the addition of a bridge for bike and walking connection between Area A and North Area B.

Southeast and South Area B: We support the restoration of Southeast and South Area B west of the freshwater marsh as presented in Alternative 1 Phase 1 with a few changes. Creating small tidal channels as proposed in this area will enhance the habitat for native species and possibly support increased numbers of endangered and threatened species in this underperforming wetlands area. We support the protection of the eucalyptus patch to protect Monarch Butterflies, but it should not be allowed to spread further.

Our support for this Alternative is based upon the inclusion of the following changes and additions:

1. Modify proposed channel location to protect Willow Thickets along Bluff from salt water inundation, both on the surface and in groundwater.
2. Do not build berm that prevents brackish marsh from spreading naturally from the freshwater marsh culvert.
3. Ensure that topography allows for vegetated wetlands to thrive and provide additional water quality filtration, and also for a diversity of wetland habitats, i.e. low, mid, and high marshes, and brackish marsh.
4. Remove invasive non-native pampas grass, and other invasive species.
5. Maximize vegetated wetland acreage, especially to create nesting and foraging habitat for Belding's Savannah Sparrow.

East Area B: We support the Alternative 1 Phase 1 plan to protect seasonal wetlands in East Area B. To maximize wetland habitat, East Area B should not be buried with fill.

Our support for this Alternative is based upon the inclusion of the following changes and additions:

1. Add major pedestrian and bike path around East Area B as per Alternative 2 Public Access Plan.
2. Remove non-native vegetation.
3. Daylight this portion of the culvert from Ballona Freshwater Marsh to Ballona Creek to allow freshwater to reach seasonal wetland area and allow for riparian and/or brackish habitat to develop, recognizing that rainfall and tidal influences will affect this dynamic area over time.

West Area B: We support the Public Access Plan of Alternative 1, Phase 1 in West Area B. We support the monitoring and protection of Belding's Savannah Sparrow nesting and foraging habitat. We support removal of Gas Company infrastructure.

Our support for this Alternative is based upon the inclusion of the following changes and additions:

1. Survey for rare and sensitive plants and animals and plan for their relocation before depositing fill.
2. Provide bathroom facilities at this primary trailhead comparable to those at the Newport Back Bay Nature Preserve.
3. Provide additional details on the detention basins for storm-water runoff planned in West Area B.
4. Protect existing wetlands habitat and endangered and threatened species as long as possible while expanding their presence in other parts of Ballona.

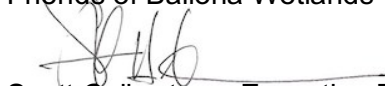
5. Assure that the connection of the last remaining dunes habitat to the adjacent wetlands is protected.
6. Restrict public access through the sensitive dune habitat that currently hosts the Federally endangered El Segundo Blue Butterfly. This area should not have a public trail.
7. Address more directly how upstream water quality improvement projects are compatible with the restoration goals for water quality and sediment loads. Provide more information about how the project design will handle changes, including in terms of the extent of monitoring that will occur. While we recognize that much of the Ballona Creek Watershed is beyond the scope of the restoration project, it is reasonably foreseeable that the timing, scope and overall approach of projects and planning efforts happening upstream to address environmental concerns, including the Ballona Creek Bacteria TMDL Project and Ballona Creek Enhanced Watershed Management Program, will affect water quality and sediment loading downstream. We strongly recommend a cumulative impacts and sensitivity discussion to disclose the impacts, both positive and negative, of upstream projects on the project site.
8. Extend pedestrian access trail down the north side of Culver Blvd. and connect to the existing trail leading to the Viewing Platform.
9. Provide more information about the access road in West Area B to demonstrate the need for this development. If the road is not required for emergency use, then it should be eliminated from the plan.
10. Provide additional sources and information for Draft EIR/S conclusions on sea level rise impact. Include sea level rise impact on surrounding community and how that will affect Ballona.
11. Investigate increased tidal flow by modifying tide gates to allow some additional flow into West Area B and increase tidal inundation of the salt pan without losing Belding's Savannah Sparrow nesting or foraging habitat or flooding roads/nearby development.

The Coalition Steering Committee thanks you for your work, and would be pleased to answer any questions and to help with efforts to facilitate the restoration work ahead.

Sincerely,

The Wetlands Restoration Principles Steering Committee:

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