



February 2, 2018

Mr. Richard Brody
CDFW c/o ESA (jas)
550 Kearney Street, Suite 800
San Francisco, California, 94108

Daniel Swenson, Regulatory Division
U.S. Army Corps of Engineers
Los Angeles District
915 Wilshire Blvd, Suite 930
Los Angeles, CA 90017

Sent Via E-mail to: BWERcomments@wildlife.ca.gov and daniel.p.swenson@usace.army.mil

SUBJECT: Ballona Restoration DEIR Comments by Friends of Ballona Wetlands

Dear Mr. Brody and Mr. Swenson:

Friends of Ballona Wetlands is pleased to provide comments on the Draft Environmental Impact Report/Statement. In addition to these specific Friends comments, the joint comments of the Wetlands Restoration Principles Coalition Steering Committee are attached. With our Coalition partners, and as an individual organization, we strongly support the restoration plans described in Phase 1 of Alternative 1, with various important amendments as described in this letter. We believe the project will be the most important environmental restoration and public access project ever undertaken for the residents of Los Angeles County.

Friends of Ballona Wetlands has championed the restoration and protection of the Ballona Wetlands, involving and educating the public as advocates and stewards, since our founding in 1978. Countless visitors have participated in tours through the Ballona Wetlands over the last 40 years. For the last 19 years, we have restored the historic dunes with the help of tens of thousands of volunteers.

Our comments address 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 our comments strike the proper balance. We support access points, separate 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 designated areas where public access should be limited due to the presence of a federally listed endangered species residing in sensitive dune habitat. We believe well designed trails will improve enforcement and increase protections within the Reserve.

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

In addition, we have several added comments:

Overview Comments

In general, the Friends find that the wetlands habitat of West Area B is substantially better than much of the remainder of the wetlands, and that it supports important endangered species such as the Belding's Savannah Sparrow. We also find that the addition of a new levee adjacent to west Culver Blvd., behind Culver Blvd. businesses and separating the much-restored dunes habitat from the existing wetlands habitat would not be environmentally superior to Alt 1, Phase 1 (with the amendments we have recommended.) and is costlier. We find that Alternative 1 Phase 2 should only proceed in order to protect the area from severe sea level rise that cannot be addressed by less extreme measures. In addition to the limited options provided in this DEIR, we believe other methods of adapting to climate change should be researched for Ballona. It would be ecologically irresponsible to ignore technology and adaptive management methods that could increase resilience to climate change while also protecting the diversity of the wetlands.

It is our strong recommendation that, if and when it is determined Alternative 1 Phase 2 must proceed in order to protect the area from sea level rise, the following must be assured:

1. Adequate nesting and foraging habitat for Belding's Savannah Sparrows must be in place throughout Ballona in Areas A and B that support an equal or greater number of nesting pairs than currently exist in West Area B. No species should be extirpated during any part of this restoration, rather, more species, especially endangered and species of special concern, should be encouraged to thrive.
2. Improvements in upstream water quality and sediment loads must occur prior to breaching levee along West Area B. Measures that prevent loss of habitat diversity and protect existing native vegetation cover to greatest extent possible must be implemented.
3. Mechanisms to protect the historical salt pan from becoming permanent open water must be implemented to the greatest extent possible.
4. The construction of a levee along Culver and adjacent to the dunes must limit disturbance and enhance connectivity to dune system and El Segundo Blue Butterfly habitat.

Area Specific Comments:

Area C:

We support the plans for Area C presented in Alternative 1 Phase 1 with a few minor changes. We generally support the placement of fill on Area C from Area A given that it is our understanding that it will not increase the height of Area C in a way that will negatively impact the nearby community, but will instead enhance Area C with gentle sloping vegetated knolls that do not obstruct views, but may reduce traffic noise along Culver and Lincoln Boulevards.

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

1. Place fill in such a way that will not negatively impact the aesthetics of the area or views of the nearby residents.
2. Assure that safety and privacy of adjacent homes are not compromised by added fill and that trailheads are coordinated with that community.
3. Provide more information on the likely placement of interpretive panels along walking paths, viewing platforms, etc. and ensure that they are compatible with ecological goals.
4. Take advantage of the viewing opportunity for visitors to the Ecological Reserve in Area C South to observe wildlife in Ballona Creek at the Centinela Creek Convergence.

West Area B:

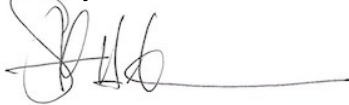
Friends of Ballona Wetlands does not support full-tidal. As described in our overview comments, CDFW and the US Army Corps must demonstrate the need for full-tidal with additional data, otherwise the current habitat should remain, as it best reflects the historic conditions of a bar-built estuary.

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

1. Public access for parking for visitors should also be available for those patronizing community restaurants and shops and should remain open until 11:00 pm.
2. Re-contour portions of the tidal channels in West Area B to allow for more gradations in vegetation type.
3. Adapt West Area B for sea level rise consistent with plans related to the surrounding communities. Continue to research best technology that could minimize disturbance. Consider using current available technology such as pumps, slowly increasing elevation, etc.

Thank you for your attention to our comments. We are delighted to look at a future where significantly more healthy wetlands and uplands habitat exist once again at Ballona, and where bike and walking trails provide for the safe enjoyment of our citizens and visitors!

Sincerely,



Scott H. Culbertson
Executive Director

Enclosure:

Wetlands Restoration Principles

Wetlands Restoration Principles Coalition Steering Committee comment letter

cc:

Friends of Ballona Wetlands Science Committee

Lisa Fimiani, Board Member

Neysa Frechette, Staff Field Biologist

Ruth Lansford, Founder and Board Member

Dr. Edith Read, Board Member

Catherine Tyrrell, Board Member

Patrick Tyrrell, Staff Habitat Restoration Manager

