

Ballona Wetlands Ecological Reserve

This is Not a Genuine Restoration Project

WETLANDS

Some of the most important functions of wetlands are:

- **Biological Diversity** Because aquatic and terrestrial habitats overlap in wetlands, they serve wildlife from both realms, as well as plants and animals that have adapted specifically to life within the wetlands. The multitude of wetland organisms includes 41 of the state's rare and endangered species.
- **Recreation** The diversity of wildlife and aesthetic qualities found in many wetlands attract large numbers of outdoor enthusiasts, including hunters, anglers, boaters, birdwatchers, and photographers.
- **Flood Control and Groundwater Recharge** The retention and slow release of flows in freshwater wetlands can lessen the effects of flood peaks and provide groundwater recharge.
- **Erosion Control** Where a wetland borders a large or deep water body, vegetation protects against erosion by stabilizing banks and damping wave energy.
- **Water Quality Protection and Improvement** Water passing through a wetland carries with it organisms, sediments, nutrients, and pollutants. The vegetation and soil in the wetland form a kind of sieve, trapping those materials and filtering the water.
- **Fish and Wildlife** The combination of vegetation and open water in wetlands provides food, rearing areas, and cover for waterfowl and shorebirds, as well as spawning habitat and food for freshwater and marine fishes. Many species of birds and fish are absolutely dependent on wetlands.

Source: <http://resources.ca.gov/wetlands/introduction/values.html>

[T]he project is misnamed as a restoration project. As discussed by the attached report of Land Protection Partners, **the project is not restoration but rather removal of currently existing wetlands and replacement with a non-naturally occurring wetland.** Therefore, the project description is misleading. **Los Angeles Audubon Society Response to Draft EIS/EIR**

“[T]he EIR fails to accurately describe the project. (LPP Report, Section 3.1) **The proposed project is not a restoration within the plain meaning of that term, nor a restoration as that term is defined in the Code of Federal Regulations. (Ibid.)**” **Los Angeles Audubon Society Response to Draft EIS/EIR**

One purpose of the project is to restore ecological functions and services within the Ballona Reserve. **However, the DEIS does not explicitly discuss and evaluate the expected functions and services that will be restored.** **National Marine Fisheries Service/NMFS Response to Draft EIS/EIR**



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In its previous comment letters, the [United States Fish and Wildlife] Service stated its concerns regarding increased habitat fragmentation associated with the proposed project.

Our primary concerns with the proposed project are:

- 1) the lack of clear objectives for the restoration;
- 2) the large extent of temporal impacts to vegetated areas (about 336 acres for about 10 years relative to the gain in aquatic/wetland habitats (about 61 acres);
- 3) the increase in habitat fragmentation associated with placement of new flood control levees/berms;
- 4) the increase in disturbance to wildlife associated with increased recreation; and
- 5) uncertainty regarding the extent of maintenance required for flood control and recreation infrastructure. **United States Fish & Wildlife Service/USF&WS Response to Draft EIS/EIR**

Dr. Margot Griswold, Restoration Ecologist, explains her concerns:

1. **Historically, the Ballona Wetlands were mainly brackish and freshwater marsh and salt pan areas with adjacent upland. The only time the wetlands were open to the sea with direct tidal connection was after very large flood events, and then the sand would build again and block the flow. Ballona Creek, which was channelized to convey flood flows, never naturally extended beyond Lincoln Blvd as an actual creek.**

It makes no ecological sense to replace the habitats that currently exist with saltwater marsh and berms. Coastal wetlands include the following habitats: freshwater marsh, brackish marsh, salt pan, as well as tidal marsh wetlands. Over the past 100 years in southern California, more salt pan and freshwater marsh habitat has been developed but in the past 30 year, mainly tidal wetlands have been 'restored' for mitigation, 'creating' tidal wetlands from areas that were disturbed former freshwater, salt pan and brackish marsh. These statements are supported by studies of historical ecology.

2. The habitats that currently exist support many coastal wetland and upland species of wildlife, including several that are sensitive, rare, and/or threatened/endangered. It is objectionable to consider destroying the habitat that supports these species simply because of a misguided 'restoration' plan devised without adequate public input.



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3. As planned, it is a very expensive project. A much more reasonable project for the wetlands would be to enhance the habitats that exist now. Part of that enhancement could use the freshwater that currently is dumped into Ballona Creek from the Playa Vista Freshwater Marsh. The Playa Vista project installed illegal drains, during construction of the Freshwater Marsh, within Area B that were draining freshwater away from habitat for over 20 years.
4. **When is the last time you heard of a project that was planning for sea level rise by digging lower than the current sea level? ...that is what is being proposed**
5. Public access and wildlife viewing could be accomplished with careful planning and without impinging on wildlife. The Ballona Wetlands is a State Ecological Reserve – not a park.

SERIOUS PROBLEM FOR “AFTER RESTORATION”

Los Angeles County Flood Control District has stated that they will not be responsible for operations and management (O&M) of the new berms that are planned to be a replacement for the already well-functioning levee system that provides flood control protections now. They are requesting that CDFW take responsibility for things that they have no expertise in nor funds to access for implementation, including emergency work to manage flood risk and sediment removal/dredging. **LACFCD Response to Draft EIS/EIR**

**What Ballona needs is maintenance,
management, and species RECOVERY**

