BALLONA INSTITUTE
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Wetlands Defense Fund

October 23, 2012

Ballona Wetlands Restoration Project
LEAD AGENCIES:
United States Army Corps of Engineers
Colonel Mark Toy c/o Daniel Swenson
California Dept. of Fish & Game
Director Charlton H. Conham, c/o David Lawhead

and c/o Donna McCormick
consultant hired by the Santa Monica Bay Restoration Foundation and/or
CA State Coastal Conservancy
1 Ada, Suite 100
Irvine, CA 92816

Re: NOP for Ballona Wetlands "restoration project"

Dear Colonel Toy DFG Director Bonham, and Ms. McCormick,:

Please accept these comments as part of the public response for scoping comments called for by the US Army Corps of Engineers and the California Dept. of Fish & Game. We understand that, as a result of requests by U.S. Congressmember Janice Hahn, CA Senator Ted Lieu and LA City Councilman Bill Rosendahl, that comments are still being accepted until 5 pm today. We are, thus, submitting these comments via email by 5 pm pacific time. We also understand you will accept comments from the Venice Neighborhood Council (VNC) tomorrow, based on an agreement made verbally between Mr. Lawhead and Marc Saltzberg of the VNC.

We have read and are in agreement with the official comments submitted by Sierra Club's authorized voice on this topic – Sierra Club's Ballona Wetlands Restoration Committee. Please include their comments in our submission, and also please reply to the following in your draft EIR/EIS documents so that the public can be fully informed about the plans for this project and any alternatives that might be considered.

1. Most importantly, please consider the Wildlife-Friendly Alternative that was developed by Playa del Rey-based Ballona Institute. Ballona Institute's naturalists and biologist have been the most consistent and persistent observers and documenters of wildlife

and habitat in the Greater Ballona Wetlands area since the 600+ acres of coastal lands became public in 2003-2004.

Please also consider this Wildlife-Friendly Alternative as the PREFERRED ALTERNATIVE, since it would adhere to the principles of the "Father of Ecological Restoration," Aldo Leopold, and would consider the impacts of what we don't know in terms of species which may not have been yet observed or documented, as well as the interdependency and connectedness of food webs and the equilibrium that has evolved during the past 50-80 years.

2. Please analyze and explain how the seasonal pond soil crusts will be protected during the proposed restoration and how, if not protected, what the loss will be to the various ecological systems which depend on them.

3. Please analyze and fully consider the ground-nesting bee species. Document them, explain their roles in the ecosystem as pollinators and describe the losses to the ecology of the various coastal mosaics of habitats that the destruction of these species' habitats will translate to.

4. Please apply the rejuvenation principles that our organizations, as well as Sierra Club and several other groups have supported to each of the proposed alternatives and proposed projects in the EIR/EIS process.

5. Please analyze and explain how each of the following bird species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem, explain their foraging, roosting, breeding and shelter needs and then explain how each will be impacted by each of the alternatives considered, including the Wildilfe-Friendly Alternative (attached to this email message.)

    a. White-tailed Kite *(Elanus leucurus)*
    b. Western Meadowlark *(Sturnella neglecta)*
    c. California Gnatcatcher *(Polioptila californica)*
    d. Least Bell's Vireo *(Vireo bellii pusillus)*
    e. Blue-Gray Gnatcatcher *(Polioptila carulea)*
    f. Great Blue Heron *(Ardea herodias)*
    g. Northern Harrier *(Circus cyaneus)*
    h. Burrowing Owl *(Athene cunicularia)*
    i. Great Egret *(Ardea alba)*

j. Ash-throated Flycatcher *(Myiarchus cinerascens)*
k. Yellow-headed Blackbird *(Xanthocephalus xanthocephalus)*
l. Bullock's Oriole *(Icterus bullockii)*
m. Lazuli Bunting *(Passerina amoena)*
n. Blue Grosbeak *(Passerina caerulea)*
o. Hooded Oriole *(Icterus cucullatus)*
p. Barn Owl *(Tyto alba)*
q. Great Horned Owl *(Bubo virginianus)*
r. Tree Swallow *(Tachycineta bicolor)*

6. Please analyze and explain how each of the following butterfly species , explain their foraging, roosting, nesting and shelter needs present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, (and any others that should be documented and may be impacted) will be impacted by the proposed restoration plan, explain their roles in the ecosystem, explain their foraging, breeding and shelter needs and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

a. Western Tiger Swallowtail Butterfly *(Papilio rutulus)*
b. Monarch Butterfly *(Danaus plexippus)*
c. El Segundo Blue Butterfly *(Euplilotes battoides allyni)*
d. Pygmy Blue Butterfly *(Brephidium exile)*
e. Wandering Skipper *(Panoquina errans)*
f. Painted Lady Butterfly *(Vanessa cardui)*
g. Acmon Blue Butterfly *(Plebejus acmon)*
h. Mourning Cloak *(Nymphalis antiopa)*
i. Buckeye Butterfly *(Junoia coenia)*
j. Mormon Metalmark *(Apodemia mormo)*
k. Red Admiral *(Vanessa atalanta)*

7. Please document, analyze and explain how the various spider species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

8. Please document, analyze and explain how each of the various moth species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated

adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

9. Please document, analyze and explain how each of the various mushroom and other fungi species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

10. Please document, analyze and explain how each of the various lichen species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

11. Please document, analyze and explain how each of the various SAV (Submerged Aquatic Vegetation) species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

12. Please analyze and explain how the various ant and ant-like species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, including those documented in Area A (which is proposed for heavy dredging and alteration) in the Ralph Schreiber LA County Natural History Museum report will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

13. Please analyze and explain how the various dragonfly and damselfly species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

14. Please analyze and explain how the various beetle species present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

15. Please analyze and explain how the various additional insect species (not covered in other requests in this letter) present at Ballona will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

16. Please analyze and explain the ecological significance of the Ballona Tule Fog, present approximately 1/3 to 2/3 of the mornings each year in the Ballona Valley, and then please analyze and explain how the proposed project, as well as various alternatives, would impact the presence of the Ballona Tule Fog, especially since observations include the non-presence of the Ballona Tule Fog in the deeper Ballona Creek channel, while its presence persists in Areas A, B and C.

    a. Which species are supported by the presence of the Ballona Tule Fog?

    b. How does the Ballona Tule Fog impact the ground saturation and ponding of water in seasonal ponds?

    c. How does the Ballona Tule Fog interact with the soils, the plants, the animals, and how would its diminishment impact these aspects of Ballona?

    d. How does the Ballona Tule Fog interact with other parts of the Greater Ballona Wetlands Ecosystem, including the Freshwater Marsh, the various City-owned Lagoons, the bluff restoration and LAWA-owned nearby open space, wild areas, and how would its diminishment or other impacts during construction and after impact these various areas?

17. Please analyze and explain how the various small mammal species (including, but not limited to the South Coast Marsh Vole – *Microtus californicus*) present within the 600+ acres of the Ballona Wetlands state-owned land, as well as associated adjacent wild lands, will be impacted by the proposed restoration plan, explain their roles in the ecosystem and then explain how each will be impacted by each of the alternatives considered, including the Wildlife-Friendly Alternative (attached of this email message.)

18. Please analyze and explain all impacts to wildlife and to adjacent neighborhoods the construction traffic, as well as air pollution from diesel fumes and any other environmental impacts from the heavy machinery contemplated for use in the industrial mechanized bulldozing and earthmoving alteration plan, as well as the associated impacts from other alternatives, including the Wildlife-Friendly Alternative.

19. Please detail, analyze and explain all impacts and from hardscape of concrete, steel and other contemplated unnatural features the proposed project would have on the habitat as well as on individual species and imperiled populations of species.

20. Please detail, analyze and explain all impacts to commuter traffic from contruction and other associated project components.

21. Please detail, analyze and explain which specific species will be helped by the proposed changes in soil elevation the project contemplates.

22. Please detail, analyze and explain which specific species will be helped by the proposed changes in water and soil salinity the project contemplates.

23. Please detail, analyze and explain which specific species will be helped by the proposed changes in soil elevation the project contemplates.

24. Please detail, analyze and explain which specific species will be helped by the proposed changes in pH the project contemplates.

25. Please detail, analyze and explain which specific species which COULD BE REINTRODUCED to the Ballona Wetlands Ecological Reserve will be helped by the proposed changes the project contemplates. Specifically, these species:

    a. Los Angeles Sunflower *(Helianthus oliveri)*
    b. Saltmarsh Bird's Beak *(Cordylanthus maritimus)*
    c. Pacific Pocket Mouse *(Perognatus longimembris pacificus)*
    d. Ventura Marsh Milk-vetch *(Astragalus pycnostachyus var. lanosissimus)*
    e. California Quail *(Callipepla californica)*
    f. Greater Roadrunner *(Geococcyx californianus)*
    g. Bald Eagle (nesting) *(Haliaeetus leuococephalus)*
    h. Osprey (nesting) *(Pandion haliaetus)*
    i. Tidewater Goby *(Eucyclogobius newberryi)*
    j.

26. Please analyze whether or not the above-listed species (in request #25) could be reintroduced to the Ballona Wetlands Ecological Reserve without the proposed project being completed and whether or not

27. Please review and analyze all relevant historical maps and reports related to the Ballona Wetlands and determine whether or not the proposed project and its alternatives protect and maintain features that were historically present on the Los Angeles coast during the last 300-500 years.

28. Please review and analyze all relevant scientific reports and other observations that indicate whether or not year-round full tidal openings to the sea were conditions that the Ballona marsh lands and its inhabitants evolved with.

29. Please review the legal requirements related to whether or not pollution from one impaired water body, i.e., Ballona Creek, is allowed to be diverted into another impaired water body, i.e., the Ballona Wetlands Ecological Reserve areas that are on either side of the Ballona Creek estuary.

30. Please analyze and explain how the interruption of secession of plants and the associated ecological systems will impact various species and habitats that have been healing and evolving since the 1960s when the last heavy alteration of Area A and Area C occurred. Include scientific predictions of how many years this secession will be set back and how many years it will be until a similar ecological equilibrium will be set.

31. Please analyze the equilibrium of the various mosaic of ecosystems present at the state-owned Ballona Wetlands ecosystem lands currently. Note the number of years each ecosystem type has been in a state of relative equilibrium, how many years it took to reach this state, and then predict how many more years it will take to achieve a similar state of equilibrium – if the proposed project proceeds. Please also include which species will be displaced with the proposed project and note how these species will be able to return – will they return on their own? How?

32. Please detail, analyze and explain how all cultural historical and religious resources, including both those from the native First Nation people, as well as those from the past 100 years, will be properly respected and avoided in terms of protection of these resources.

33. Please explain how the avoidance criteria for wetlands protection that the US EPA has often insisted upon will be upheld during the process of carrying out any and all of the alternatives discussed in the EIR/EIS.

Thank you once again for the opportunity to comment. We trust that you will research and reply to each and every one of these comments, as the rare and imperiled ecosystem that the Ballona Wetlands is, including its mosaic of habitat types is unique and irreplaceable.

Please add our organizations to your mailing list:
Wetlands Defense Fund
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Playa del Rey, CA 90293

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Should you have further questions, feel free to call Ballona Institute at: 310-823-7040 or Wetlands Defense Fund at (310) 821-9045.

Robert Roy van de Hoek

Robert Roy van de Hoek /s/

Conservation Biologist & President
Wetlands Defense Fund

Marcia Hanscom

Marcia Hanscom /s/

Executive Director
Ballona Institute