

October 22, 2012

Ballona Wetlands Restoration Project  
C/O Donna McCormick  
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To Whom It May Concern:

Please consider the following comments in preparation of the Draft Environmental Impact Report/Environmental Impact Statement for the Ballona Wetlands Restoration Project. These are my personal comments and do not represent an official position of the University of Southern California or any of my other employers. *The use of letterhead is for identification and contact purposes only.* I am an urban ecologist with a long history of research on ecological restoration (Longcore 2003; Longcore 1999; Longcore et al. 2000) and management of natural ecosystems to support native biodiversity in southern California, with more recent research on the historical conditions of coastal estuaries and riparian systems in the region (Dark et al. 2011; Jacobs et al. 2011; Stein et al. 2010; Stein et al. 2007).

First, the project description should be corrected to describe the project as wetlands “creation” not “restoration.” The proposed project in the NOP does not represent “the return of an ecosystem to a close approximation of its condition prior to disturbance,” which is a widely accepted definition of “restoration” (National Research Council 1992). The ending conditions depicted in the NOP have not been present in the system for over 2,000 years (Dark et al. 2011; Palacios-Fest et al. 2006) and would be, in fact, out of equilibrium with the hydrogeomorphological forces present in the current day watershed (Jacobs et al. 2011). The site will not be “restored” by introducing permanent tidal flows. Rather, in its historical condition prior to being jettied open to the ocean, the Ballona wetlands were only open to the ocean periodically in response to winter rains. As summarized by Dark et al. (2011):

Approximately half of the aggregate Ballona Lagoon area consisted of a freshwater and tidally affected saltmarsh and brackish habitats that transitioned into a more alkaline/freshwater system about 1.5 miles (2.4 km) inland. Historical habitat of the Ballona Lagoon coastal complex consisted of substantial amounts of brackish to salt marsh/tidal marsh habitat (29%), followed by salt flat/tidal flat (10%). Open water made up less than 3 percent of the lagoon and one of the more



salient features of the complex was a long but narrow strip of open water referred to by some as a “lake” at what we call today Del Rey/Ballona Lagoon (Sheridan 1887). This strip of open water periodically emptied into the ocean at the documented location of seasonal tidal access (figure 22). **We found no evidence that the lagoon remained perennially open, but rather the textual sources indicate that access to the ocean depended on hydraulic forces during any given year** (LAT 1887, Sheridan 1887, Hansen and Jackson 1889, Solano 1893). The migration of the Los Angeles River away from the lagoon transitioned the system into a lower energy system where only on rare occasions was there enough freshwater flow from Ballona Creek to break through the buildup of sediment along the coast. As a result, gradual build up of sediment around the terminus of the previous estuary formed dunes and created this “trapped” lake-like feature. The coastal dunes, which occupied four percent of the Ballona Lagoon coastal complex, played a significant role in the formation of the lake and the limited tidal access (see Jacobs et al. 2011).

Therefore, the creation of a meandering channel for Ballona Creek as described in the NOP would not be a “restoration.” The historical system did not have a large main channel. Changing the shape of an unnatural channel does not “restore” it.

Moving the channels will not “restore” the wetlands. To the contrary, it would introduce permanent tidal flow to areas that did not historically have such flows. The EIR/EIS should be accurate in the use of the term “restoration” and not extend it to the creation of novel wetland systems that, because they would not be supported by the existing or proposed hydrology, would require significant maintenance (i.e., dredging) to maintain and would destroy existing biodiversity.

Because the proposed project is not in any way a restoration, but rather represents creation of a distribution of wetland types that is novel in the project location, I request that the alternatives analysis include consideration of an alternative that has the following characteristics:

1. Does not adversely impact features on the landscape that have been stable since the late 1800s. This includes the dune system, various salt pan areas, and existing brackish to saltmarsh habitat currently dominated by native species. That is, all native habitats that roughly correspond with their historical locations are not disturbed. Essentially, “First, do no harm.”
2. Does not remove the levees, because these unnatural structures serve the role of the barrier dune that separated the wetland system for the ocean. Their removal unnaturally opens the wetlands area up to permanent tidal flow and would introduce pollution from Ballona

Creek into the wetlands area. The alternative should use tidal gates and active management to create explicitly desired wetland conditions to support rare and endangered species that were historically present in the wetlands system.

3. Has explicit rare or endangered target species that were historically present in the Ballona wetlands complex (prior to the late 1880s) and could recolonize or be reintroduced following restoration. The current project description inexplicably does not list maintenance or restoration of native biodiversity as a goal, so an alternative with biodiversity conservation as a goal should be developed and considered.

I ask that the two attached documents be made part of the record for the EIR/EIS and be considered carefully when weighing the alleged benefits of creating a full-tidal system by removing the levees (see especially the discussion in Jacobs et al. 2011).

I am deeply concerned that the State has proposed a project that is a cookie-cutter abstraction of a generic coastal wetland of a particular type that was not historically present. Pursuing a perennially full tidal design will result in a homogenization of the wetland types found regionally and will be plagued by the same maintenance issues that have been encountered at other projects that artificially open what would naturally be closing estuaries (e.g., Bolsa Chica).

Sincerely,



Travis Longcore, Ph.D.

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