



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road, Suite 101
Carlsbad, California 92011



In Reply Refer To:
FWS-LA-02B0010-13TA0185

MAR 14 2013

Ms. Donna McCormick
Ballona Wetlands Restoration Project
1 Ada, Suite 100
Irvine, California 92816

Subject: Revised Notice of Preparation of a Draft Environmental Impact Report for the Ballona Wetlands Restoration Project, City of Los Angeles and Unincorporated Los Angeles County, California

Dear Ms. McCormick:

We have reviewed the Revised Notice of Preparation (NOP) for the proposed Ballona Wetlands Restoration Project in the city of Los Angeles and unincorporated Los Angeles County, California. The Revised NOP was issued by the California Department of Fish and Wildlife (CDFW) to address the addition of an interpretive center to the project. The interpretive center would have a footprint of approximately 46,000 square feet and would include an auditorium, classrooms, public lobby, facilities for an animal adoption and care program, exhibits on wildlife and domestic animals, veterinary facilities, officer space, retail and concessions space, and associated parking.

We offer the following comments and recommendations regarding the proposed interpretive center based on our review of the Revised NOP and our knowledge of declining habitats and species within Los Angeles County. These comments are intended to supplement our comments on the original NOP (FWS-LA-02B0010-13TA0023), and are provided in keeping with our agency's mission to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people."

Our primary concerns with the construction of an interpretive center within the state-owned ecological reserve include: 1) a reduction in the extent of land available for restoration of native habitats, 2) the potential for limitations on the design of the restoration project, and 3) the potential for a substantial increase in the number of visitors and associated degradation of habitats from human-generated disturbance.

We recommend CDFW evaluate alternative locations for the interpretive center, adjacent to but not within the ecological reserve. Coastal lands available for restoration are extremely limited

and therefore, the benefits of including any development within the ecological reserve will need to be weighed against the cost of losing this limited resource. The proposed location of the interpretive center is at the eastern end of the property which is also the furthest upstream point along Ballona Creek. It is our understanding that Ballona Creek contains significant levels of contaminants that could impact the quality of the restoration site (Johnston et al. 2012). One potential option to address this concern would be to create a detention basin and/or treatment wetlands at the upstream end of the property to increase the quality of Ballona Creek water before it enters the restoration site. Alternative uses of the land for the creation of habitats that will contribute to the overall function and value of the restoration project should be given priority over the inclusion of an interpretive center within the ecological reserve.

If no other adjacent property is available for development of an interpretive center, we recommend interpretive spaces within the state lands be restricted to educating the public about the native habitats and species within Ballona Wetlands, rather than creating a domestic animal adoption center and veterinary services, which could be located anywhere.

We appreciate the opportunity to comment on the subject NOP. If you have any questions regarding these comments, please contact Christine Medak of this office at 760-431-9440, extension 298.

Sincerely,



for Karen A. Goebel
Assistant Field Supervisor

Literature Cited

Johnston, K.K., Del Giudice-Tuttle, E., Medel, I.D., Piechowski, C.J., Cooper, D.S., Dorsey, J., and Anderson, S. 2012. The Ballona Wetlands Ecological Reserve Baseline Assessment Program: Second Year Report. Santa Monica Bay Restoration Commission. Prepared for the California State Coastal Conservancy, Los Angeles, California.