



Ballona Wetlands Restoration Committee

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 Ms. McCormick, Colonel Toy and DFG Director Bonham:

We appreciate the opportunity that California and U.S. law allows for the public to be included in scoping comments. While the law may not require actual public hearings during the scoping process, we remain extremely disappointed that there has been no public hearing prior to the draft EIR/EIS preparation. We continue to ask, as our Congressman, the Honorable Jane Harman, our State Senator, The Honorable Ted Lieu and our Los Angeles City Councilmember, The Honorable Bill Rosendahl, have also asked, that you convene a hearing for the public to be able to hear each other, as well as for decision-makers to hear all relevant comments, some of which will not be heard fully when only submitted in writing.

In addition to this request, please respond to the following requests in the draft EIR and draft EIS documents that are prepared for the project you are proposing for the Ballona Wetlands Ecological Reserve, state-owned lands which were paid with bond funds voted on by the public, and which were – at the price of \$139 million – the highest per/acre cost for land preservation in the history of the state of California.

1. Please analyze and explain how construction traffic by all of the proposed alternatives of this project will impact neighborhoods surrounding the ecological reserve, as well as how the construction will impact commuter traffic on Lincoln Blvd., Culver Blvd., the 90 Marina Fwy., Mindanao, Fiji Way and Jefferson Blvd.
2. Please analyze and explain how the rare and endangered species that are dependent in any way for habitat (shelter, resting, food, water or refuge) at the Ballona Wetlands Ecological Reserve will be impacted by the proposed project and any of its alternatives.
3. Please analyze and fully consider the “Wildlife Friendly Alternative” that has been submitted by Ballona Institute, and supported by Sierra Club, as one of your alternatives for this project, and explain fully why it is not the most environmentally preferable and least environmentally damaging alternative.
4. Please apply the rejuvenation principles that Sierra Club and several other groups have supported to each of the proposed alternatives and proposed project in the EIR/EIS process.
5. Please explain why the south levee, in its current state of equilibrium, is not one of the preferred walking trails for public access, given its proximity to the wildlife, its current use by dogwalkers, fishermen and others, and consider this path as one of the proposed major public trails.
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7. Please explain why Cabora Dr. is not one of the preferred walking trails for public access, given its proximity to the wildlife, its higher location and consider this path as one of the proposed major public trails.
8. Please explain and analyze the "Lincoln Blvd. fault" which was identified and described by Dr. Victor Jones during the Playa Vista construction approvals, and describe how this fault (which is still a fault, although not called that due to PV's lobbying activities, yet it still operates as a fault) will possibly impact aquifer activity that relates to flooding of the wetlands via the proposed restoration.
9. Please analyze and explain how the drawdown of the water table by Playa Vista based on its requirement by the LARWQCB to clean up contamination floating atop the groundwater – dumped presumably during the Hughes' ownership of the land before there were environmental laws – will impact the flooding of the wetlands, explain how the flooding of the wetlands will impact that aquifer, and explain how those waters will be separated, how any mixing will impact wildlife, how it will impact any drinking water portions of the aquifer and how it will impact the settling of the land beneath the Playa Vista residential and commercial buildings, as well as how all of this activity impacts the highly explosive methane seeps documented as present in this region.
10. Please analyze and explain how the underground gas storage at the Ballona Wetlands Ecological Reserve will be impacted by the proposed flooding of the wetlands by seawater and how any construction activities will impact the gas storage field and possible hazards to surrounding residents, as well as to wildlife.
11. Please analyze and explain which species are being managed for in this proposed "restoration," and how each of these species will be assisted or supported in their life cycles by the proposed restoration. Also please analyze this same topic for each of the alternatives considered, including the "Wildlife Friendly Alternative."
12. Please analyze and explain how sea level rise will impact the ecological reserve under each proposed alternative considered in the EIR/EIS.

13. Please analyze and explain how many people will be allowed to visit the ecological reserve each day – and how such visits will impact the wildlife. Include any sensitive times of year that might be different in terms of use due to restrictions that might be imposed.
14. Please analyze and explain how the construction of large buildings proposed along Fiji Way – including at the proposed boat storage facility and Fisherman’s Village – may impact the proposed restoration, and considering the restoration alternatives, explain what the differences will be for flights from egrets and herons to and from their rookeries and roosting sites, given the proposed restoration alternatives.
15. Please analyze and explain how the Great Blue Heron and Great Egret rookeries on adjacent public lands will be impacted by the loss of upland habitat contemplated in various alternatives for the “restoration.
16. Please analyze and explain how any proper “restoration” can be planned in the presence of unknown, unregulated, unpredictable interference with the fresh water aquifer, as this aquifer passes under and to the east of Lincoln Blvd. and is underneath the Playa Vista business and residential development?
17. Please analyze and explain how the gas mitigation systems that are in place at Playa Vista, which require continual pumping and disposal of large volumes of fresh water, which is disposed of, will be impacted by the proposed restoration, especially since it is apparent that this process is not properly nor consistently monitored. Also explain the effect on the supply of fresh water to the Ballona Wetlands, given these circumstances. What effects on the natural ecological balance will result?
18. Please analyze and explain how the Playa Vista Treatment Basin, also called the “Freshwater Marsh,” will impact the natural mix of waters in the “restored” Ballona Wetlands, which would presumably received water from the aquifer, the treatment basin’s runoff from Playa Vista and the Pacific Ocean. How much fresh water is pulled out of the fresh water aquifer, and will this water be free from contamination by the time the restoration begins? How can the public be assured of this?

19. Please analyze and explain how much water from off site is injected into the "freshwater marsh" to keep it full in dry times, and how will this input of water impact the Ballona Wetlands "restoration" plans?
20. Please explain how the Native American – First Nation – cultural and religions concerns will be respected – unlike previous situations on related Ballona Valley lands.

Thank you for the opportunity for Sierra Club to comment on the scoping of this proposed project.

Sincerely,

Marcia Hanscom /s/

Marcia Hanscom
Chair, Sierra Club Ballona Wetlands Restoration Committee
322 Culver Blvd., Ste. 317
Playa del Rey, CA 90293
(310) 821-9045