

The Steering Committee of the Wetlands Restoration Principles Coalition



January 17, 2020

Mr. Richard Brody
CDFW c/o ESA (jas)
550 Kearney Street, Suite 800
San Francisco, California, 94108

Sent Via E-mail to: BWERCcomments@wildlife.ca.gov

Dear California Department of Fish and Wildlife (CDFW):

On behalf of the Friends of Ballona Wetlands, Heal the Bay, Surfrider Foundation, Los Angeles Waterkeeper, and the Trust for Public Land, we offer our strong support for a robust, science-based restoration of the Ballona Wetlands Ecological Reserve in response to the release of the Final Environmental Impact Report (FEIR). This support includes restoration Alternative 1, Phase 1 along with CDFW's measures that will protect existing sensitive resources such as the Belding's savannah sparrow, least Bell's vireo, El Segundo blue butterfly, and freshwater/riparian and dune habitats. These five leading environmental organizations in Southern California, representing more than 25,000 members, make up the Steering Committee of the Wetlands Restoration Principles Coalition. The Coalition brings organizations together to advocate collaboratively to support wetland restoration projects that follow our nine principles of restoration. Success starts by using these accepted best practices to maximize every opportunity for comprehensively and scientifically restoring our degraded wetlands.

Restoration of the Ballona Wetlands will be one of the most significant environmental restoration and public access projects ever undertaken for the residents of Los Angeles County. This is a rare opportunity to provide our State with an invaluable way to stay resilient in the face of climate change, provide a wildlife haven and recreational treasure, and leave a legacy for future generations.

California has lost 91% of its wetlands and Los Angeles County has lost even more. In the face of climate change, large scale wetland restoration projects, particularly those in urban areas like the Ballona Wetlands restoration project, need to proceed expeditiously and thoughtfully. The release of the FEIR is a positive step in this direction, and we look forward to certification, permit approvals, and commencement of the restoration. We cannot delay, this proposal needs to move forward. Every day that restorative efforts are delayed, the Reserve continues to degrade. A majority of the wetlands are disconnected from their natural hydrology and overrun by invasive vegetation that prevents native plants and animals from resettling or

thriving. Wetlands are critical habitat for countless species and provide necessary ecological functions such as carbon sequestration, storm surge protection, flood control, water filtration, and oxygen creation. Without this restoration, we deprive the region of the opportunity for protection from continuing sea level rise, a threat that is not only here, but will continue to endanger coastal communities into the future. Climate resilience should be at the forefront of our minds to guide our priorities and decisions. Restoring Ballona to a high functioning wetland is the next step in the fight against climate change.

We would like to thank CDFW for taking our comments into consideration and look forward to seeing the detailed design and management plans.

We support a restoration that strengthens biodiversity and ecological function, provides habitat for special status species, and creates watershed connectivity that will increase water quality and nursery habitat for fish. We support a restoration that reduces habitat fragmentation to the greatest extent possible and provides safe corridors for wildlife passage.

We support the Belding's savannah sparrow Mitigation Measure Bio-1i-ii as proposed in the Final EIR. We appreciate the clarification that more protective measures will be put in place beyond just one nesting pair of birds. We are confident that the three mechanisms described will ensure that high quality habitat and adequate monitoring exist to support a breeding population of sparrows before breaching the levee along West Area B or otherwise impacting the existing population of this endangered species. We believe the measures and outcomes described, such as a "net increase of 69.6 acres of potentially suitable habitat", "a minimum, double the amount of impacted suitable breeding habitat", a "3.4:1 habitat creation to impact ratio", and "focused monitoring efforts ... to ensure that populations of these species either remain at pre-restoration levels or increase in size, and [implementation of] appropriate management efforts ... if populations of these species decline in size" will protect and support this population of endangered birds at the Reserve. The current population of nesting Belding's savannah sparrows began to thrive when adequate tidal flow was re-introduced to West Area B, greatly improving the quality of nesting habitat available. We agree that the definition of suitable breeding habitat in the FEIR as, "areas dominated by pickleweed with a hydrologic regime similar to that currently present in West Area B, with similar slope, inundation, and soil salinity" and that assurance that "percent cover of pickleweed will approximate areas of West Area B, at a minimum of 60 percent cover" will meet a suitability threshold to support the population of sparrows in newly created high quality habitat in Area A. We further appreciate that "the temporal and permanent loss of habitat in Area B will not have negative impacts on the species" and that the department will confirm "that the species is actively using restored tidal marsh and salt pan habitats in Area A and/or South Area B" prior to implementation of Alternative 1 Phase 2. We look forward to seeing these criteria and safeguards reflected in the detailed monitoring and maintenance plan.

We support CDFW's plan to "maintain freshwater conditions" and appreciate the department's consideration of daylighting the Ballona Freshwater Marsh Culvert in East Area B to add additional freshwater into this seasonal and isolated habitat. We value that fact that in the FEIR, "Mitigation easure 1-BIO-1k has been updated to reflect use of the West Area B tidal

channels as a reference” in contouring tidal channels in a way that will protect freshwater habitat that supports riparian-obligate species, like least Bell’s vireo. We further recommend that CDFW consider sea level rise, drought, and other long-term sustainability factors to preserve freshwater resources. We also appreciate that “none of the total 6.6 acres of vireo habitat would be permanently impacted during site restoration and 3.2 acres of additional habitat would be created that may support this species”. We encourage the department to identify opportunities to improve freshwater conditions wherever possible in order to maximize habitat diversity and heterogeneity within the Reserve.

We support a thoughtful restoration that utilizes on-site biological monitors to survey and relocate animals that may be impacted by restoration activities, as described by Mitigation Measure BIO-1b-ii, Biological Monitoring. We also support an adaptive management plan that monitors conditions to produce desired outcomes without significantly impacting valuable resources, such as endangered species and good quality habitat that has already been restored or maintained.

We support a public access plan that protects ecological resources from human impacts while providing educational and recreational opportunities for Angelenos, and particularly our underserved communities. Pedestrian and bike paths along the perimeter of the Reserve and information kiosks, as described in the FEIR, will provide critical educational opportunities to visitors. We encourage the department to include sufficient restrooms and parking in the final design to meet the needs of visitors to the Reserve. We agree with the discussion in the FEIR that the Area A parking lot should “consolidate existing parking” to reduce “existing paved parking area by approximately 0.8 acres, increasing the area available for restoration” and value that “any final design would need to be approved by CDFW to ensure minimal impact to wildlife and to ensure the final size and configuration fit the expected needs of the Ballona Reserve.” We also agree that “removing visitor parking... would be counter-productive to encouraging appropriate public use of the Ballona Reserve.” We appreciate that CDFW will consider the request that “restroom facilities be added.”

We are confident that there is a fertile funding environment for this project and that residents of California support environmental restoration and actions to combat climate change. We look forward to seeing a speedy certification and permitting process in order to bring about a restoration in a reasonable timeframe.

Sincerely,

The Wetlands Restoration Principles Steering Committee