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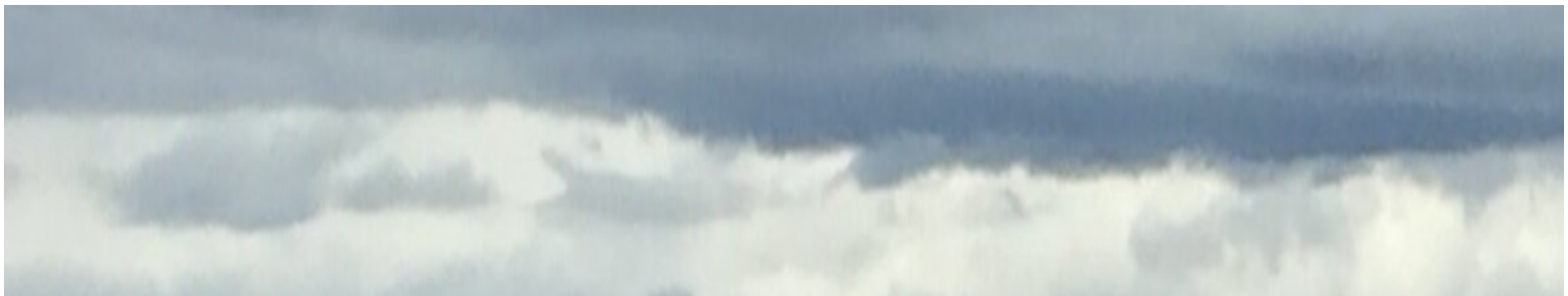
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MESSAGE FROM MARGOT: Considering the State's Plan for the Ballona Wetlands



October 27, 2020 (</blog/2020/10/27/message-from-margot-considering-the-states-plan-for-the-ballona-wetlands>) · [Western Tanager](/blog/category/Western+Tanager) (</blog/category/Western+Tanager>), Volume 87 (</blog/category/Volume+87>), Vol. 87 No. 2 (</blog/category/Vol.+87+No.+2>), [LAAS Board Letters](/blog/category/LAAS+Board+Letters) (</blog/category/LAAS+Board+Letters>)



White-tailed Kite roosting with Mourning Doves at the Ballona Wetlands | Photo by Jonathan Coffin (2020)

The Ballona Wetlands Ecological Reserve (BWER) is the last coastal wetland in Los Angeles. It is sandwiched generally between Marina del Rey to the north, Playa Vista to the east, bluffs to the south, and the double dune system to the west, separating it from the Pacific Ocean. The wetlands are bisected by the Ballona Flood Control Channel, which carries rainwater and dry season urban flow from the upper Ballona Creek Watershed through the urban core to the ocean. The BWER is owned and managed by the California Department of Fish and Wildlife (CDFW), a State resource agency.

Los Angeles Audubon Society (LAAS), with the help of 30+ volunteer docents, has conducted free environmental educational field trips at the BWER for over 25 years. The students served are generally from Title 1 schools from various local school districts, and until Covid-19, we served on average 2,100 students annually. Additionally, for the past 6 years, LAAS has sponsored Open Wetlands at BWER on the first Saturday of the month. Open Wetlands is the only opportunity for the public to stop by unannounced and take a tour with our dedicated and knowledgeable volunteer docents.

CDFW began a top-down planning process for the 'restoration' of BWER that ignores the unique aspects of this coastal wetland. CDFW's subsequent Environmental Impact Report (EIR) set forth three alternatives that were so similar as to be indistinguishable, as well as the no-project alternative. LAAS supports the missing alternative, that is, a coherent alternative for the restoration, rehabilitation and re-establishment of the historic and currently existing habitats at BWER. The current alternatives are not focused on, and appear unlikely to provide, optimal benefit to the range of wildlife and plants historically present and/or wildlife currently of concern. They are still there!

Specifically, the alternatives currently proposed for the BWER represent an approach to create a generic coastal, full tidal wetland that was not historically present, as documented in research of the Historical Ecology of the Ballona Creek Watershed (see Dark et al. 2011). All the current project alternatives will convert the historically varied and dynamic/seasonal system into a perennially open tidal system. The Ballona Wetlands were not perennially open to the ocean but were isolated from the Pacific by the double dune system that was breached only in heavy rainfall years, closing again soon after (Jacobs et al. 2011). This relevant science has been brought to the attention of the project proponent, CDFW, many times over the years.

The current project alternatives do not focus on the heterogenous nature of the wetlands with its fresh to brackish water, representing the seasonally variable habitats historically and currently present in these wetlands. An alternative design should work with the existing landscape to avoid the currently proposed and unnecessary engineering that will remove landscape and soil features that have been present for over 150 years. Soil is an ecosystem unto itself and is of crucial importance to any restoration project. When a project describes removing soil as a 'restoration' it should be scrutinized carefully because it takes a long time to develop productive soil once the subsoil has been exposed. In the case of the current Ballona project description, it is proposed to dig up 3 million cubic yards of productive soil and use it to create tall upland berms on current wetlands, apparently as flood protection for private housing projects. This approach is ecologically inefficient and unsustainable. We cannot afford to discard soil and create uplands out of wetlands.

Nor has CDFW considered the regional context of the Ballona Wetlands. The approach in pursuing a full tidal design will result in the further homogenization of the coastal wetlands found regionally rather than re-establishing and enhancing the ecological

function of habitats that currently exist within this coastal wetland. The Ballona Wetlands project should be designed in the context of the region where loss of fresh/brackish marsh, salt flats, and saltmarsh is far greater than open water/tidal mudflat. The above table from a study of north San Diego County coastal wetlands illustrates this greater loss of salt flats and freshwater/brackish wetlands compared with salt marsh, and studies of Orange County and Ventura County (Bolsa Chica and Ormond Beach) have similar findings. Coastal wetlands include more than full tidal wetlands.

BWER is also designated as an Important Bird Area (IBA) by Audubon California, and the varied habitats should be treated as such to protect the year-round residents as well as migrating avian species.

The current alternatives do not incorporate the most recent science about southern California estuary formation, such as Jacobs et al. 2011, and the specific historic ecology of BWER found in Dark et al. 2011. Science is necessary to inform a project of this magnitude, especially when the project is going against the natural processes of the Pacific Ocean and historic estuary closure patterns.





The current project description does not list maintenance of, or restoration of, native biodiversity as a goal, and rather describes only increasing a generic biodiversity and generic tidal wetland function. There are no specific wildlife species, including birds, and no plant species, listed as targets for the proposed habitat creation.

A project alternative with the goal of conserving the existing biodiversity that also attempts to restore some of the historic biodiversity should be developed and considered. Such an alternative could include habitat reestablishment and rehabilitation designs that do not remove the Ballona Stormwater Channel levees since these levees now serve the role of the barrier dune that historically separated the Ballona Wetland system from the ocean. Such an alternative might look at using the existing Playa Vista Freshwater Marsh (where water is currently being dumped directly into the Ballona Stormwater Channel from the recently constructed Freshwater Marsh) and the existing Centinela Creek for seasonal freshwater inputs.

The 2020 spring rainfall this year showed what the Ballona Wetlands can do with freshwater inputs. Photos from the adjacent West Bluffs trail stand in testimony that the Ballona Wetlands thrive with seasonal freshwater input.

The proposed removal of the Ballona Stormwater Channel levees will allow permanent tidal flow to the wetland areas and likely allow saltwater intrusion into the freshwater aquifers found below the Ballona Wetlands. These potential impacts are not discussed adequately in the DEIR/EIS nor the Final EIR. There was no adequate hydrology study conducted for the project to determine the impacts to the freshwater aquifers, only a hydraulics study on the flows of the Ballona Stormwater Channel. Removal of the channel levees in the last mile would introduce pollution from the entire Ballona Creek Watershed into the Ballona Wetlands, which is far too small to clean all the pollution that comes down

the waterway. Perhaps it might be better to start at the Upper Ballona Creek Watershed and treat the water as it passes through the communities that the project fails to consider. Without pre-treatment, allowing polluted water from the Ballona Stormwater Channel into the wetlands may cause more harm to the existing wetlands, including the soil and flora/fauna. An alternative should be developed to include brackish and freshwater marsh with muted tidal influence using tidal gates and active management. Such a plan would result in the diverse coastal wetland conditions to support rare and endangered species that are present and were historically present in this wetlands system. Such a design with appropriately placed tidal gates could be engineered to produce managed flushing flows to avoid siltation. The design should also strive to reconnect the currently disconnected areas of the Ballona Wetlands by addressing Culver Blvd and Jefferson, potentially connecting through special culverts or put roadways on a causeway.

We call for a re-assessment of the current plan alternatives by convening habitat planning workshops with an unbiased facilitator, and ‘stakeholders’ that include a voice for the birds, the plants, soil, and the water as well as flood control and public access. This type of working group will provide a transparent process to consider the science concerning the Ballona Wetlands. The habitats that currently exist support many coastal wetland and upland species of wildlife, including several that are sensitive, rare, and/or threatened/endangered. It is objectionable to consider destroying the habitat that supports these species simply because of a misguided ‘restoration’ plan devised without adequate public input, and that disregards the science that shows the ecological flaws of the plan.

Historic and Contemporary Acres of Coastal Wetland Habitats

	Historical (acres)	Contemporary (acres)	% Change
Salt marsh	1,330	1,170	-12%
Salt flat (seasonally flooded)	1,230	120	-90%
Open Water/mud flat	140	980	615%
Freshwater/brackish wetland	1,650	760	-54%
Developed		1,440	

From: Northern San Diego County Lagoons Historical Ecology Investigation: Regional Patterns, Local Diversity, And Landscape Trajectories. San Francisco Estuary Institute, 2014.

Consensus must be reached to find the most ecologically efficient plan to increase the functional integrity of the existing wetlands. True public input and consensus has been missing from the process. It can be done with some planning and open discussion.

Please join LAAS, to express your concerns and ask for a transparent process to provide a real alternative to the proposed project. Email us to join our campaign and get on the Ballona Wetlands mailing list. Email to: carolbabeli@laaudubon.org (<mailto:carolbabeli@laaudubon.org>).

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