

Ballona Wetlands is a Predominantly Freshwater, Seasonal Wetlands



THE SACRED SITE OF SA' ANGA



WATER IS LIFE

Protect Ballona's Aquifers

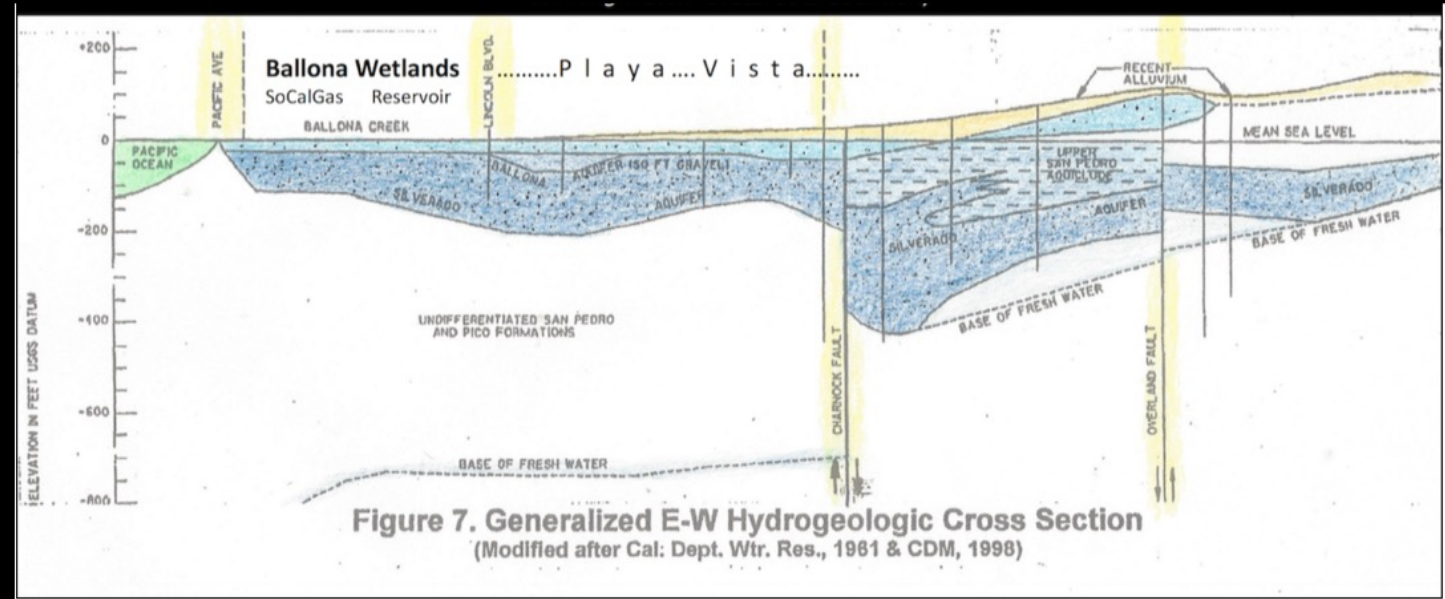


Terrestrial

Ballona is a Groundwater Dependent Ecosystem
Enforce the Sustainable Groundwater Management Act

WATER IS LIFE

Protect Ballona's Aquifers



A Title 14, Section 630, Non-Marine Ecological Reserve (FGC 2005)



TATTN


TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION

A TRIBAL SOVEREIGN NATION UNDER THE UNDRIP AND AS A CALIFORNIA NATIVE AMERICAN TRIBE - VERIFIED BY NAHC - SB18-AB 52-AJR 42 RECOGNIZED BY THE STATE OF CALIFORNIA AS THE ABORIGINAL TRIBE OF THE LOS ANGELES BASIN AND ISLANDS



Who is protecting Ballona's Plentiful Natural Freshwater?

Who is Promoting the Freshwater Drainage and Conversion of Ballona Wetlands Into Something It Never Was?



*The value of wetland ecosystems
that remain intact...*

The ongoing planning efforts associated with the Ballona watershed can benefit from the insights of historical ecology. While the Ballona watershed is highly urbanized, it retains remnants of its historical natural resources mainly in the form of coastal wetlands and natural springs. Developing an understanding of potential restoration options in such landscapes depends upon a sound understanding of both contemporary conditions and historical ecological wetland functions. Introduction, Historical Ecology of Ballona Watershed..

December 30, 2021 Ballona. Jonathan Coffin



Ballona Indigenous People call Ballona Wetlands, Pwinikipar— Tongva word for "it's full of water".

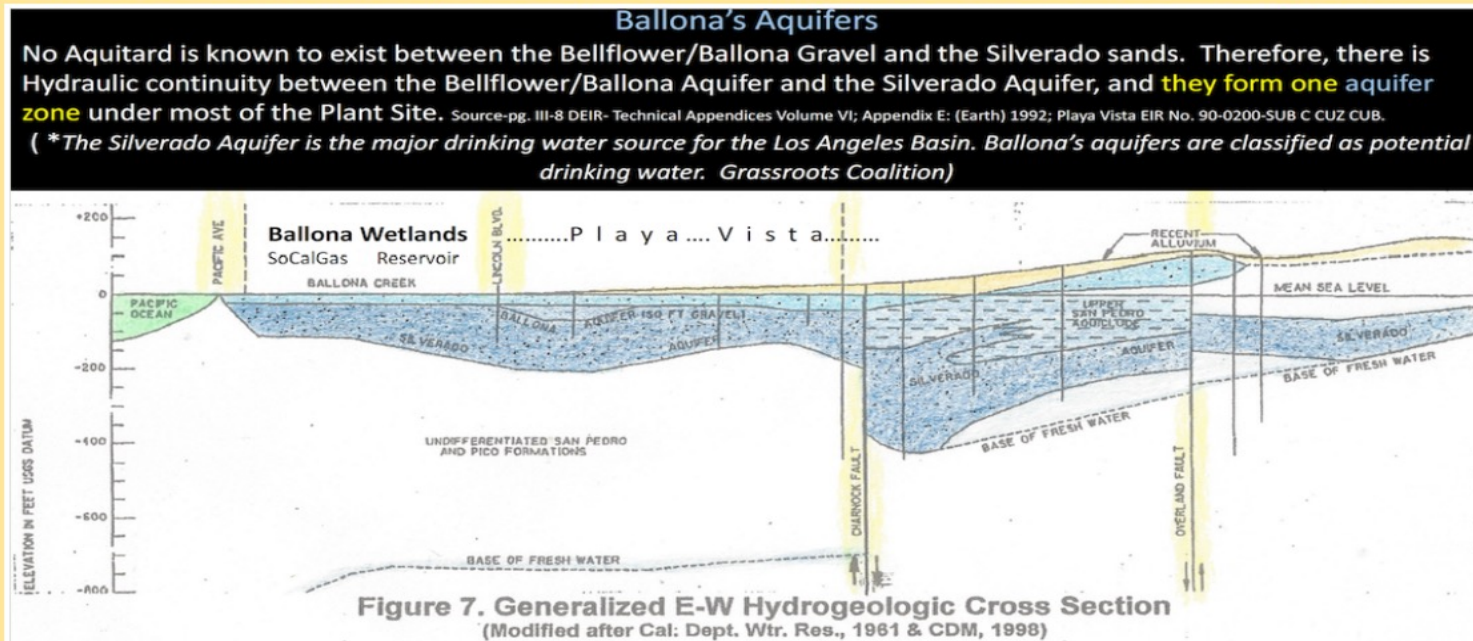


What Are the Dewatering Needs of the Playa Vista Project?



1. **Stormwater Surface Runoff for Flood Control**
2. **Remediation** of the Howard Hughes/McDonald Douglas Aircraft **groundwater** contamination (Clean Up & Abatement Order 98-125, oversight by Los Angeles Regional Water Quality Control Board (LARWQCB) - treat/pump/discharge- NPDES Permits)
3. **Permanent Groundwater dewatering for methane gas mitigation** at building sites to keep the groundwater one foot below the gas mitigation systems, to prevent failure from clogging with water/silt etc. (Playa Vista Methane Prevention Detection & Monitoring Program (PVMPDMP) LA CITY ORDINANCE for Phase 1; Phase 2 Citywide Methane Code)

The fresh groundwater across Playa Vista/Ballona Wetlands is at or near the surface. (Playa Vista EIRs, Phase 1- 1990; Phase 2, Village- 2003. The freshwater aquifers are classified by LARWQCB as Drinking Water & Potential Drinking Water.





Playa Vista's 400 acre site is built on a Seasonal Freshwater Wetlands

Playa Vista buildings have groundwater pumped up and out to lower the fresh groundwater table so that its gas mitigation systems are kept free of clogging with water and silt.

The clean freshwater is wasted as it is thrown away into the sanitary sewer system rather than being sent to the freshwater dependent Ballona Wetlands. This occurs despite legal agreements to not harm Ballona Wetlands from Playa Vista's development.

(2006 Stipulated Agreement - Playa Vista(Ballona Conservancy), City of LA, Friends of Ballona, California Coastal Commission from

1:15:27

2003- Playa Vista EIR

Note the Percentage of Total Surface Stormwater Flow (in acre feet) sent into the Freshwater Marsh System from Project Buildout of Playa Vista.

The System sends **54%** to **63%** of the total surface stormwater flow off Playa Vista, into their flood control basin the 'freshwater marsh'. This water is diverted away, to the Ballona Channel via the basin's Main Drain. The catch basin is designed to prevent downward percolation due to its clay lining. Overflow is drained via drainage ditches to Ballona Channel.

CDFW can ask for Playa Vista's discharged clean freshwater to be used for sustaining Ballona. CDFW has not. CDFW hasn't performed the required Land Management Plan to use this clean freshwater for Ballona Wetlands. (Fish & Game Code 1019)

Table 28

TOTAL STORMWATER RUNOFF AND PERCENTAGE OF TOTAL FLOWS TO THE FRESHWATER MARSH AND BALLONA WETLANDS

	50-Year Storm	25-Year Storm	10-Year Storm	5-Year Storm	2-Year Storm	1-Year Storm
Amount of Total Runoff to Freshwater Marsh (in acre-feet)^a						
With Playa Vista First Phase Project						
Flow to Freshwater Marsh	1,171	1,051	892	771	571	502
With Playa Vista First Phase Project and Proposed Project						
Flow to Freshwater Marsh	1,176	1,056	896	775	574	504
Percent of Total Flow to Freshwater Marsh Due to Proposed Project	0.4%	0.5%	0.5%	0.5%	0.4%	0.4%
Amount of Total Runoff to Ballona Wetlands (in acre-feet)						
Pre-First Phase Project						
Flow from Drains	1,039	933	792	685	507	445
Flow from Other Sources ^b	636	571	485	419	310	272
With Playa Vista First Phase Project						
Flow from Freshwater Marsh over Weir	139	104	61	32	5	0
Flow from Other Sources ^b	618	555	471	407	302	265
With Playa Vista First Phase Project and Proposed Project						
Flow from Freshwater Marsh over Weir	149	122	77	48	11	0
Flow from Other Sources ^b	618	555	471	407	302	265
Percent of Total Flow to Ballona Wetlands Due to Project Buildout Compared to Pre-First Phase	-54%	-55%	-57%	-59%	-62%	-63%
Percent of Total Flow to Ballona Wetlands Due to Proposed Project (Compared to Playa Vista First Phase Project)	1.3%	2.7%	3.0%	3.6%	2.0%	0.0%

^a Freshwater Marsh did not exist during pre-First Phase conditions.

^b Flows in this table summarize flows to the Ballona Wetlands which are not the same as flows from other sources indicated in Table 24 because modeled peak flows over the weir do not necessarily occur at the same time as the peak flows to the Freshwater Marsh and the Ballona Wetlands. Variances may be caused by storm intensities and time of concentrations in the SWMM model.

Source: Psomas.

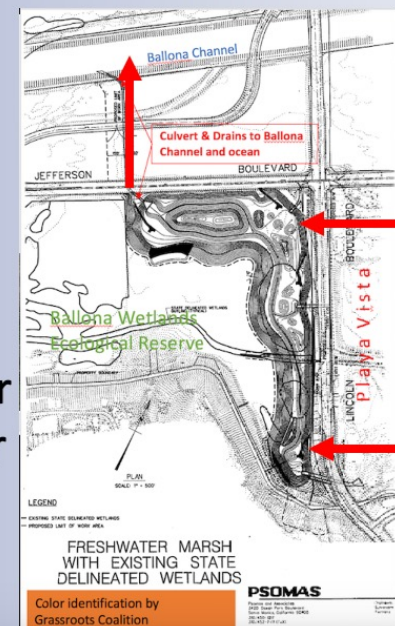
the existing Ballona Wetlands. Table 28 provides a breakdown of stormwater flows to the Ballona Wetlands calculated for various size storm events.

As indicated in Table 28, the increase in amount of runoff flowing to the Ballona Wetlands due to development of the Proposed Project compared to with Playa Vista First Phase is estimated to range from 0 percent to 3.6 percent, depending on the size of the storm event.

None of this available freshwater has been considered by CDFW for providing freshwater to Ballona, in their Environmental Impact Report.


None of Ballona's natural freshwater has been evaluated per compliance with the Sustainable Groundwater Management Act to protect the multiple underlying freshwater aquifers classified as Drinking Water & Potential Drinking Water.

CDFW provides no hydrological consideration to protect & use Ballona's freshwater in this Groundwater Dependent Ecosystem.



Phase 1 & 2 Playa Vista Drainage System 2003, EIR

Phase 1 & 2 Drainage System still intended to use the Ballona Wetlands as areas to receive and transfer storm water from the planned development. However, the Ballona Wetlands now are owned by the State of California.

 **Note:** the **red arrows** have been added to indicate where runoff from storm events will exit the Ballona Wetlands and the Fresh Water Marsh into the Ballona Flood Control Channel.

No consideration of **Sea Level Rise** in the the discussion of the runoff into the Ballona Flood Control Channel.

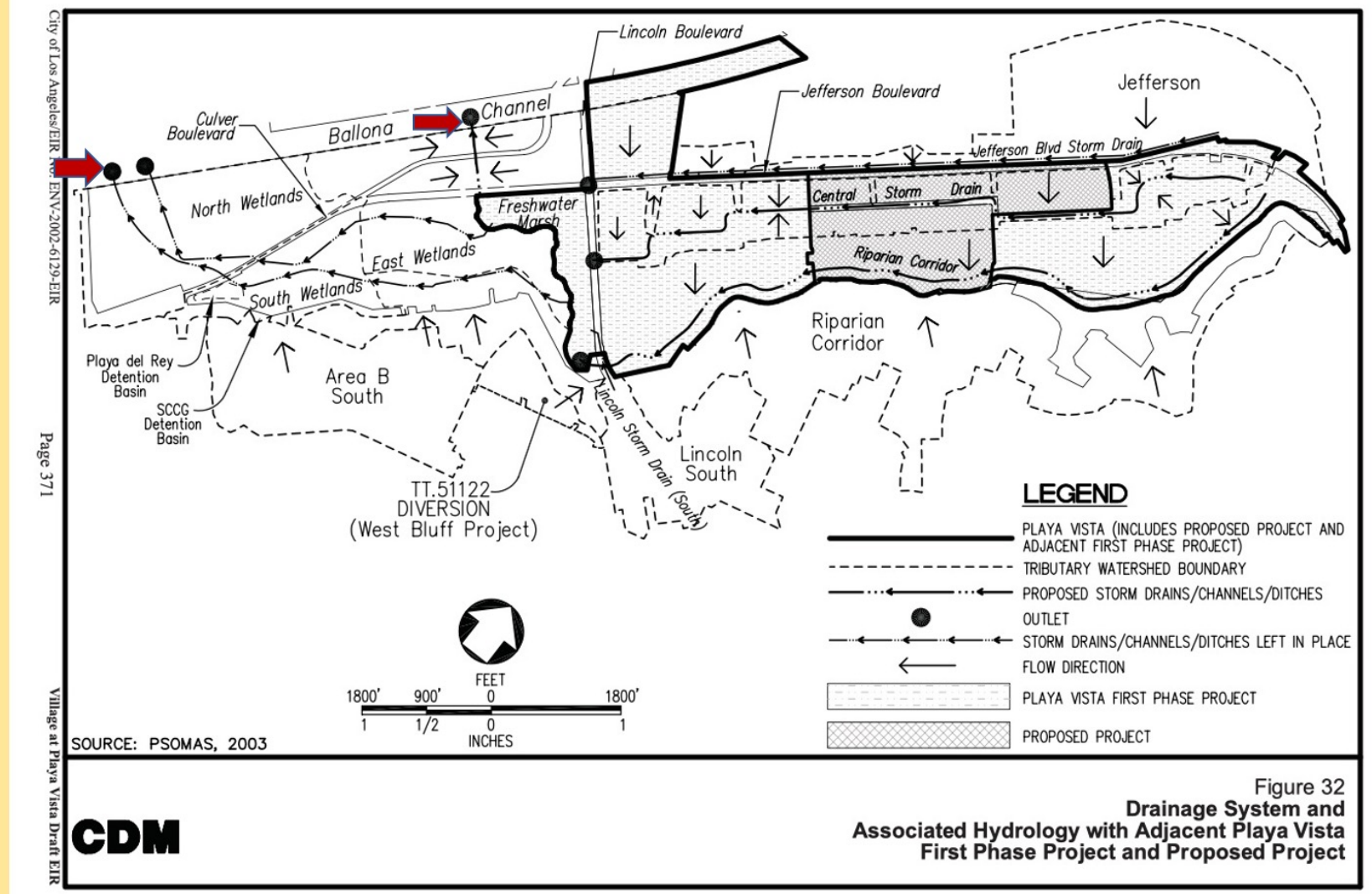
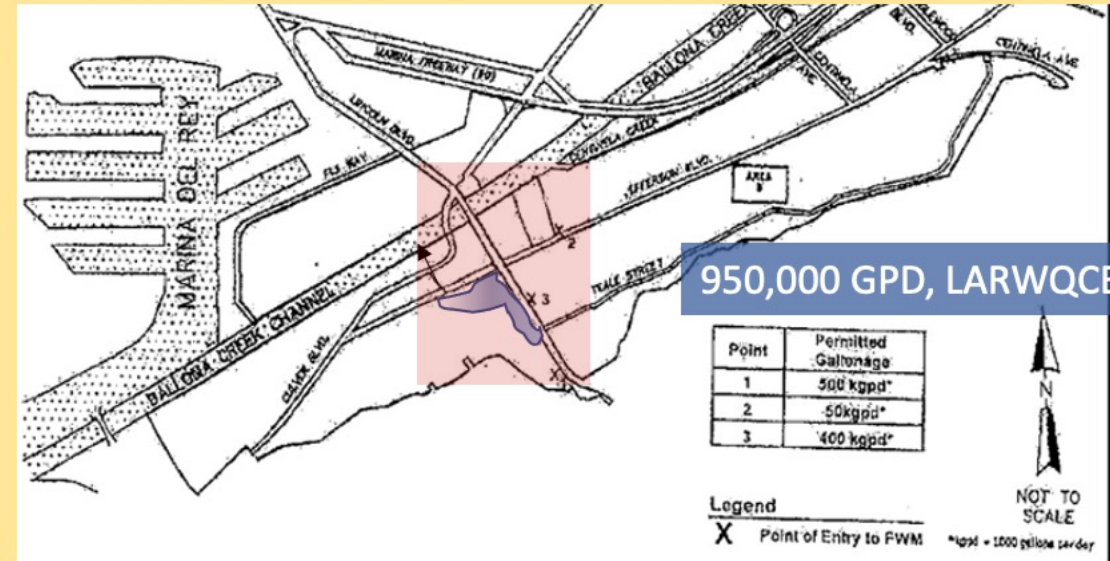


Figure 32
Drainage System and
Associated Hydrology with Adjacent Playa Vista
First Phase Project and Proposed Project

LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD DEWATERING/ DISCHARGE OF CLEANSED GROUNDWATER FOR CLEAN UP & ABATEMENT ORDER 98-125.

Howard Hughes / MacDonald Douglas Aircraft Operations Contamination/Remediation

LARWQCB Records show **950,000 Gallons Per Day** permitted Discharge to the Flood Control Basin and other culverts—all discharge to the Ballona Channel. Occasional overflow of the Basin is received by Ballona Wetlands but, drainage ditches divert the surface flow into Ballona Channel also.



John Tommy Rosas- Tongva Ancestral Tribal Territorial Nation (TATTN)

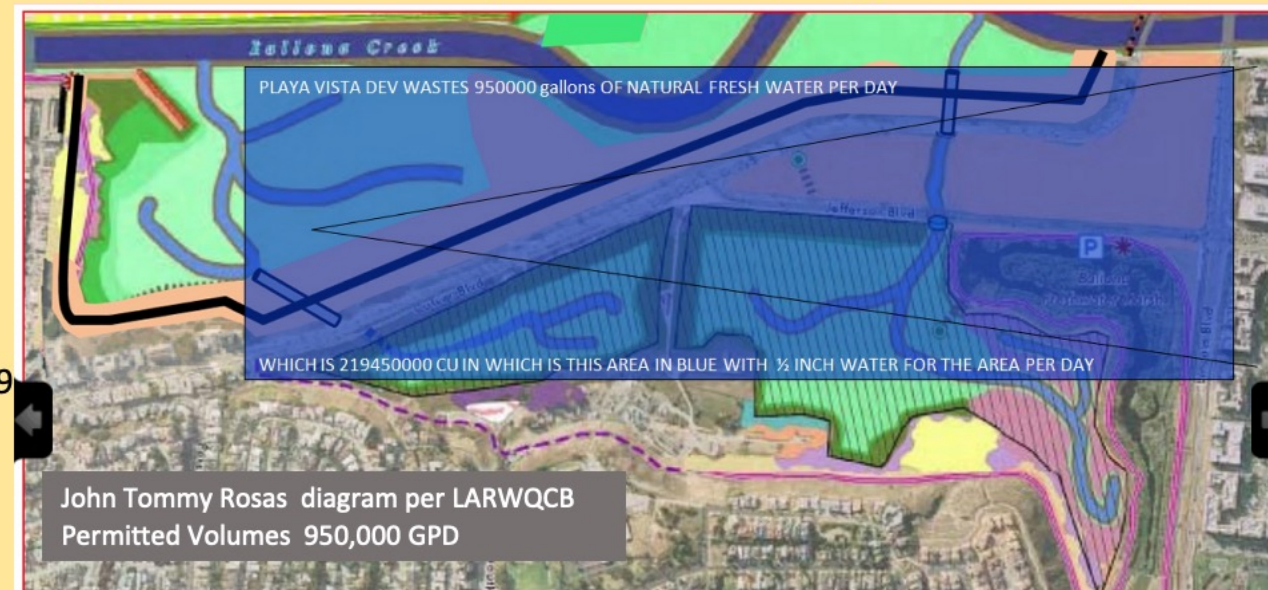
registered Ballona Wetlands as the Tongva/ Gabrieleno Sacred Site, Sa'anga. The land & water of Ballona are SACRED.

His calculations of LARWQCB dewatering discharges provide the diagram below that depicts the availability of 1/2" of daily freshwater across the blue highlighted area of Ballona.

As of 2020, LARWQCB cites there is one active, NPDES Discharge permit for Playa Capital LLC. that allows for **500,000** gallons per day (gpd) of cleansed groundwater to be sent into the flood control system of Playa Vista.

All exit into Ballona Channel.(NPDES CAG914001/Order R4-2018-0087,CI-6839)

A school site's groundwater (1,500 gpd) is sent to LA Sanitation as are **the volumes of residential gas mitigation dewatering** under Industrial Wastewater Discharge (IWD) permits.





These are all development sites at Playa Vista that require permanent groundwater dewatering in order to keep their gas mitigation systems, at least, one foot above the groundwater, so system failure does not occur due to clogging with water and silt.

From: Manik Mohandas
To: Kang, Jim@Waterboards, Lonnie Ayers, Jose Uy
CC: Lonnie Ayers, Jose Uy
Date: Sep 13, 2018 at 8:45 AM
Subject: Re: Manik, LA Sanitation contact info
Attachment(s): 1

Hi Jim,

Below is the link to download the 45 permits in the vicinity of Playa Vista. Apologize that it took so long, please let me know if you have any questions or have issues downloading the permits.

<https://drive.google.com/drive/folders/12h4HWWVeErsbBIP1v-n0lo1okFdxSmDjD?usp=sharing>

Thanks
Manik

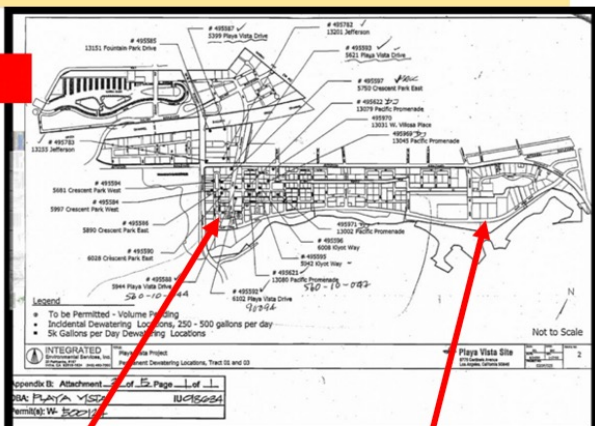
SerialNumber	PermitDate	IU_Number	PermitNumber	IU_Name	FileName
1	20080326	IU021530	W503029	Chatelaine	20080326_IU021530_W503029_Chatelaine.pdf
2	20080318	IU099092	W505365	Waterstone	20080318_IU099092_W505365_Waterstone.pdf
3	20080326	IU099105	W505382	Tapestry	20080326_IU099105_W505382_Tapestry.pdf
4	20080326	IU099106	W505383	Tapestry	20080326_IU099106_W505383_Tapestry.pdf
5	20080318	IU101692	W508846	Coronado	20080318_IU101692_W508846_Coronado.pdf
6	20080318	IU102894	W510023	CrescentWalk	20080318_IU102894_W510023_CrescentWalk.pdf
7	20080318	IU102896	W510024	CrescentWalk	20080318_IU102896_W510024_CrescentWalk.pdf
8	20080326	IU102900	W510025	Villa_dEste	20080326_IU102900_W510025_Villa_dEste.pdf
9	20080326	IU102903	W510026	Catalina	20080326_IU102903_W510026_Catalina.pdf
10	20080318	IU102904	W510027	Paraiso	20080318_IU102904_W510027_Paraiso.pdf
11	20080318	IU102906	W510028	Avalon	20080318_IU102906_W510028_Avalon.pdf
12	20080318	IU105693	W512474	CenterPointe	20080318_IU105693_W512474_CenterPointe.pdf
13	20080319	IU105696	W512476	TheMetro	20080319_IU105696_W512476_TheMetro.pdf
14	20080320	IU105696	W512477	TheMetro	20080320_IU105696_W512477_TheMetro.pdf
15	20080319	IU106016	W512921	ParkHomes	20080319_IU106016_W512921_ParkHomes.pdf
16	20080319	IU106479	W513124	FountainPark	20080319_IU106479_W513124_FountainPark.pdf
17	20080318	IU106480	W513125	FountainPark	20080318_IU106480_W513125_FountainPark.pdf
18	20080409	IU106481	W513126	CrescentPark	20080409_IU106481_W513126_CrescentPark.pdf
19	20080409	IU106482	W513127	CrescentPark	20080409_IU106482_W513127_CrescentPark.pdf
20	20080318	IU101692	W517549	Coronado	20080318_IU101692_W517549_Coronado.pdf
21	20080318	IU114063	W517621	Tempo	20080318_IU114063_W517621_Tempo.pdf
22	20080318	IU114063	W517622	Tempo	20080318_IU114063_W517622_Tempo.pdf
23	20080318	IU099092	W517683	Waterstone	20080318_IU099092_W517683_Waterstone.pdf
24	20080318	IU113748	W517692	TheVentana	20080318_IU113748_W517692_TheVentana.pdf
25	20080322	IU113749	W517693	TheVentana	20080322_IU113749_W517693_TheVentana.pdf
26	20080318	IU102904	W517695	Paraiso	20080318_IU102904_W517695_Paraiso.pdf
27	20080327	IU113705	W517800	Esplanade	20080327_IU113705_W517800_Esplanade.pdf
28	20160512	IU135160	W543700	TheIrvineCompany	20160512_IU135160_W543700_TheIrvineCompany.pdf
29	20160512	IU135160	W543701	TheIrvineCompany	20160512_IU135160_W543701_TheIrvineCompany.pdf
30	20160512	IU135160	W543702	TheIrvineCompany	20160512_IU135160_W543702_TheIrvineCompany.pdf
31	20160512	IU135217	W543703	TheIrvineCompany	20160512_IU135217_W543703_TheIrvineCompany.pdf
32	20160512	IU135217	W543783	TheIrvineCompany	20160512_IU135217_W543783_TheIrvineCompany.pdf
33	20160512	IU135217	W543784	TheIrvineCompany	20160512_IU135217_W543784_Playa_Vista.pdf
34	20160512	IU135218	W543859	TheIrvineCompany	20160512_IU135218_W543859_TheIrvineCompany.pdf
35	20160512	IU135218	W543860	TheIrvineCompany	20160512_IU135218_W543860_TheIrvineCompany.pdf
36	20160512	IU135218	W543861	TheIrvineCompany	20160512_IU135218_W543861_TheIrvineCompany.pdf
37	20180901	IU140424	W546417	Playa_Vista	20180901_IU140424_W546417_Playa_Vista.pdf
38	20150804	IU142166	W547009	WatersEdge	20150804_IU142166_W547009_WatersEdge.pdf
39	20180804	IU141607	W547010	WatersEdge	20180804_IU141607_W547010_WatersEdge.pdf
40	20160405	IU146871	W550050	RunwayAtPlayaVista	20160405_IU146871_W550050_RunwayAtPlayaVista.pdf
41	20160406	IU146872	W550051	RunwayAtPlayaVista	20160406_IU146872_W550051_RunwayAtPlayaVista.pdf
42	20160406	IU146873	W550052	RunwayAtPlayaVista	20160406_IU146873_W550052_RunwayAtPlayaVista.pdf
43	20160407	IU146874	W550053	RunwayAtPlayaVista	20160407_IU146874_W550053_RunwayAtPlayaVista.pdf
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Manik Mohandas, P.E.,
LA Sanitation - IWMD
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Permanent Dewatering for Methane Gas Mitigation Systems

Phase 1- west Playa Vista:

72, 500 Gallons of Clean Freshwater Per Day is diverted away from Ballona Wetlands to the LA Sanitary Sewer System



Phase 1 West
Playa Vista

Phase 1 East
Playa Vista

Playa Vista Industrial Waste Discharge Permits

Map ID	Permit Number	Project Number	Project Name	Project Address	Permitted Discharge (gal/day)	Billing Company Name	Billing Contact Person	Billing Address
1	W-510028	200	Avalon	13068 Pacific Promenade	5,000	Avalon Maintenance Corp	Shelle Xanthos	16430 Roscoe Blvd, Ste 205 Bldg 3 Van Nuys CA 91406
2	W-502607	650-1	Bridgeway Mills	5300 Playa Vista Drive	1,000	Playa Capital	Accounting	12555 W Jefferson Blvd Ste 300 Los Angeles CA 90066
4	W-502589	500-2	Carabela	12982 Augstin Place	1,000	Playa Capital	Accounting	12555 W Jefferson Blvd Ste 300 Los Angeles CA 90066
5	W-510026	200-2	Catalina	12983 Runway Road	1,000	Catalina Maintenance Corp	Shelle Xanthos	16430 Roscoe Blvd, Ste 205 Bldg 3 Van Nuys CA 91406
25	W-503027	-	CenterPointe Club	8200 Playa Vista Drive	1,000	Playa Vista Parks & Landscape	Terrance Smith	6200 Playa Vista Dr Playa Vista CA 90094
32	W-503029	1000	Chatelaine	5721 Crescent Park West	1,000	Merit Property Management	Terrance Smith	25910 Acero St 2nd Fl Mission Viejo CA 92681
7	W-495596	325	Concerto	6008 Kiyot Way	5,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
20	W-502108	-	Construction	12900 Runway Road	1,500	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
29	W-508848	625	Coronado	7101 S. Playa Vista Drive	1,000	Warminglton Group	Accounting	3090 Pullman Street Costa Mesa CA 92626
9-A	W-500133	2000	Crescent Park Apts	5750 Crescent Park East	5,000	Fairfield Residential LLC	Accounting	5510 Morehouse Dr Ste 200 San Diego CA 92121
9B	W-500135	2000	Crescent Park Apts	5621 Crescent Pk East	5,000	Fairfield Residential LLC	Accounting	5510 Morehouse Dr Ste 200 San Diego CA 92121
10-B	W-500132	100	Crescent Walk	8028 Crescent Park East, bldg 2	1,000	Crescent Walk @ PV	Shelle Xanthos	16340 Roscoe Blvd, Ste 205 Van Nuys CA 91406
10-A	W-500132	100	Crescent Walk	8028 Crescent Park East, bldg 1	1,000	Crescent Walk @ PV	Shelle Xanthos	16340 Roscoe Blvd, Ste 205 Van Nuys CA 91406
5-2	W-502606	1000-2	Dorian	6135 Crescent Park West	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
11	W-503028	500	Eplanade	13080 Pacific Promenade	1,000	Merit Property Management	Terrance Smith	25910 Acero St 2nd Fl Mission Viejo CA 92681
	W-507619	-	Firestation	6450 Playa Vista Drive	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
12-1	W-495685	-	Fountain Park Apts	13151 Fountain Park Drive	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
12-2	W-495687	-	Fountain Park Apts	5399 Playa Vista Drive	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
14	W-495971	300/1250	Lofts/Park Houses	13002 Pacific Promenade	5,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
13-A	W-500127	800	Paraiso	13073 Pacific Promenade, bldg 1	1,000	Shea Homes	Melinda Kuhn	603 S Valencia Ave Brea CA 92823
13-B	W-500129	800	Paraiso	13073 Pacific Promenade, bldg 2	1,000	Shea Homes	Melinda Kuhn	603 S Valencia Ave Brea CA 92823
15	W-503026	400	Promenade	13044 Pacific Promenade	1,000	Western Pacific Housing	Rodney Singh	6701 Center Dr W #900 Los Angeles CA 90066
8	W-509847	850	Runway Lofts	12920 W. Runway Road	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
16	W-495970	825	Serenade	13031 W. Villosa Place	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
17	W-502604	2000	South Crescent Park Apts 1	7225 Crescent Park West	10,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
26	W-502605	2000	South Crescent Park Apts 2	6555 Crescent Park West	6,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
18	W-500124	-	Sunrise	5655 Playa Vista Drive	-	-	-	-
19	W-505382	900	Tapestry	5700 Seawalk Drive	1,000	Tapestry Maintenance Corp.	Bruce Ratliff	16340 Roscoe Blvd, Ste 205 Van Nuys CA 91406
19	W-505383	900	Tapestry	5701 Kiyot Way	1,000	Tapestry Maintenance Corp.	Bruce Ratliff	16340 Roscoe Blvd, Ste 205 Van Nuys CA 91406
27	W-495969	250	Tempo	13045 Pacific Promenade	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
	W-500124	-	Test Site 2	12890 Discovery Creek Road	-	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
21-A	W-500132	600-1	The Metro	5681 Crescent Park West	1,000	Crescent Park Ventures	Accounting	1663 Sawtelle Blvd Los Angeles CA 90025
21-B	W-500134	600-1	The Metro	5625 Crescent Park West	1,000	Crescent Park Ventures	Accounting	1663 Sawtelle Blvd Los Angeles CA 90025
22-B	W-510025	700	Villa D'Este	13201 West Pacific Promenade	1,000	Villa D' Este	Shelle Xanthos	16340 Roscoe Blvd, Ste 205 Van Nuys CA 91406
22-A	W-500137	700	Villa D'Este	13215 West Pacific Promenade	1,000	Villa D' Este	Shelle Xanthos	16340 Roscoe Blvd, Ste 205 Van Nuys CA 91406
23	W-502803	700-2	Villa Savona	7204 Crescent Park East	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
26-A	W-495782	-	Waters Edge	13201 Jefferson Boulevard	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
26-B	W-495783	-	Waters Edge	13255 Jefferson Boulevard	1,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
24	W-502801	102	Waterstone	6400 Crescent Park East	5,000	Playa Capital	Accounting	5510 Lincoln Blvd Ste 100 Los Angeles CA 90094
Total Permitted Discharge Volume					72,500			

This clean groundwater is available to be sent, instead to Ballona Wetlands Ecological Reserve, a Groundwater Dependent Ecosystem, acknowledged by the Department of Water Resources for protection under the Sustainable Groundwater Management Act.

Playa Vista Has Sent Miscellaneous Dewatering Discharges of 1,000s of Gallons of Clean Groundwater to the Storm Drain System DAILY

These thousands of gallons of clean groundwater have been available for supporting the vegetation & wildlife needs of Ballona Wetlands Ecological Reserve but instead are sent to the Ballona Channel, 'through Ballona' = the flood control basin.

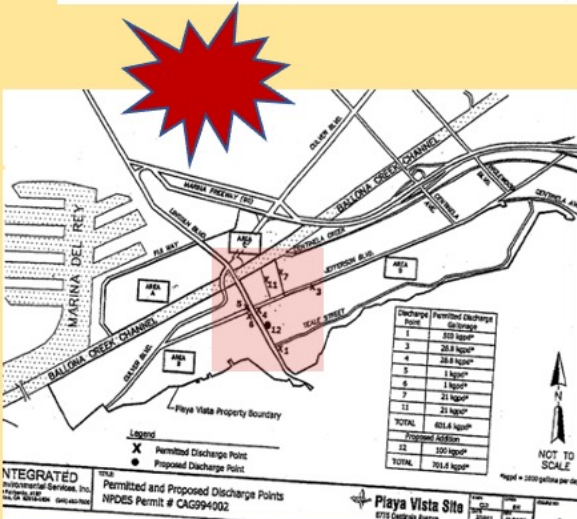
VOLUME AND DESCRIPTION OF DISCHARGE

Playa Capital is authorized to discharge groundwater from dewatering activities to the storm drain system at the following locations, below (See also Figure 2). Discharge from the outfalls listed below flows to Centinela Ditch or storm drain, through Ballona Wetlands to Ballona Creek, a water of the United States.

Outfall	Location	Latitude	Longitude	Maximum Daily Flow (gallons per day)
01	Teale St., East of Lincoln Blvd.	33° 58' 15"	118° 25' 30"	500,000
03	South West of Alla Rd./Jefferson Blvd.	33° 58' 30"	118° 25' 31"	29,000
04	South East of Lincoln Blvd / Jefferson Blvd.	33° 58' 20"	118° 25' 47"	29,000
05	North West corner of Lincoln Blvd. and Jefferson Blvd.	33° 58' 22"	118° 25' 49"	1,000
06	South West corner of Lincoln Blvd. and Jefferson Blvd.	33° 58' 20"	118° 25' 48"	1,000
07	Bay St., North of Jefferson Blvd.	33° 58' 34"	118° 25' 37"	21,000
11	Playa Vista Dr., North of Jefferson Blvd.	33° 58' 31"	118° 25' 38"	21,000
12	East Side of Lincoln Blvd. between Teale St. and Jefferson Blvd.	33° 57' 58"	118° 25' 32"	100,000

Outfall	Location	Latitude	Longitude	Maximum Daily Flow (gallons per day)
02	North East corner of Bay St. and Jefferson Blvd.	33° 58' 26"	118° 25' 39"	29,000
08	North of Jefferson Blvd., West of Lincoln Blvd.	33° 58' 13"	118° 26' 01"	21,000
09	North of Jefferson Blvd., West of Lincoln Blvd.	33° 58' 12"	118° 26' 04"	170,000
10	South of Jefferson Blvd., West of Lincoln Blvd.	33° 58' 11"	118° 26' 03"	21,000

CDFW's Environmental Program Manager, Rich Burg replies below as to CDFW's relationship with Playa Vista's Ballona Wetlands Conservancy, ***"The Department is an active participant on the Ballona Wetlands Conservancy Board."*** With easy access to the freshwater dewatering information, why has CDFW not utilized it for a Land Management Plan & GDE Study to use the plentiful, available, clean freshwater for habitat & wildlife & aquifer protection for Ballona Wetlands?



State of California - Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3863 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov


September 7, 2016

Ballona Wetlands Conservancy
Attn: Mr. Marc Huffman
Executive Director
12045 E. Waterfront Drive, Suite 400
Playa Vista, CA 900094
Marc.Huffman@brookfieldrp.com

Subject: Notice of Violation of Fish and Game Code Section 1602

Dear Mr. Huffman:

On August 22, 2016, Department of Fish and Wildlife (Department) Environmental Scientist Victoria Chau, Taylor Van Berkum, and Wildlife Officer Warden James Nguyen visited the property at Ballona Freshwater Marsh located southwest of West Jefferson Boulevard and Lincoln Boulevard, Playa Del Rey, County of Los Angeles (Figure 1). This site can be located at Latitude 33° 58' 14" North, Longitude -118° 25' 51" West. During the visit, Ms. Chau and Mr. Van Berkum entered the property from West Jefferson Boulevard and immediately observed an



Rich Burg
Environmental Program Manager at California Department Fish and Wildlife


From: Burg, Richard@wildlife.ca.gov
Date: Thu, May 2, 2019 at 12:57 PM
Subject: RE: Four quick questions/comments
To: Walter Lamb <wlb@ballona.org>, Brody, Richard@wildlife.ca.gov

Good afternoon Mr. Lamb, I hope you are having a pleasant and productive week. Please see below in red answers to your questions. Have a great afternoon!

Rich


Richard Burg
Environmental Program Manager
California Department of Fish and Wildlife
South Coast Region 5
3863 Ruffin Road
San Diego, CA 92123
T: (858) 467-4200
F: (858) 467-4239

3) Does CDFW still have a membership on the Ballona Wetlands Conservancy board? There has been some stakeholder confusion on that point and it would help everyone to have an official answer. **The Department is an active participant on the Ballona Wetlands Conservancy Board.**



PLAYA VISTA

BALLONA WETLANDS CONSERVANCY
Created by Playa Vista in 2000.



PLAYA VISTA

LA Regional Water Quality Control Board Dewatering/ Cleansing/ Discharge Volumes vary from year to year. This available clean groundwater can be returned to Ballona Wetlands for supporting habitat and wildlife, and for replenishment to the underlying freshwater aquifers.

This plentiful, clean freshwater is available for supporting Ballona's ecosystems, but is instead diverted away, into the sea via discharge to Ballona Channel.

7/22/2008) Augustine Anijelo - Playa Vista Actual Discharge Volume under General NPDES permit CI-6839 & CI-7648 Page

1999	3,545,100
2000	700,600
2001	1,520,288
2002	50,949
2003	42,966
2004	20,000
2005	80,000
2006	32,115,621
2007	45,443,762
2008	12,549,378

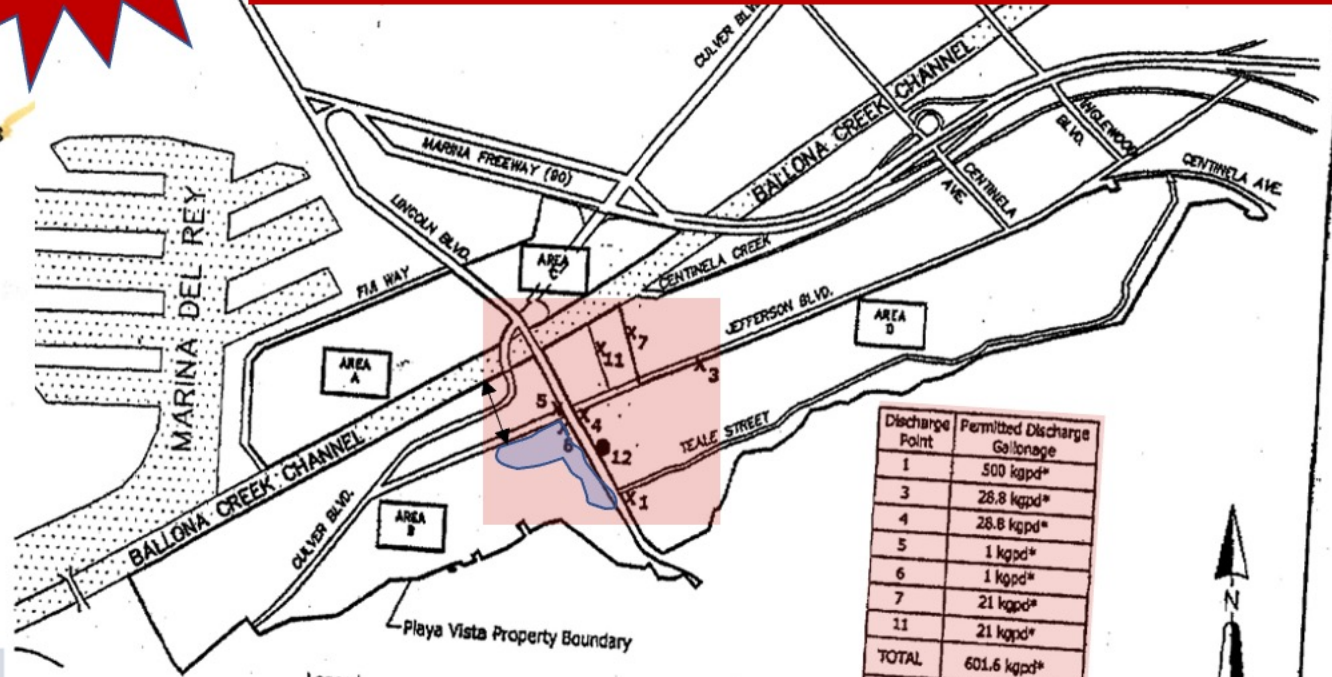
Playa Vista Construction Dewatering Permit, NPDES No. CAG994004, Order No. 2003-0111, CI-7648

Year	Total Discharge in gallons
2007	1,680,000
2006	300,000
2005	1,992,000
2004	12,199,741
2003	-----
2002	893,151
2001	14,338,946
2000	507,700

Augustine Anijelo, P.E., Chief
 General Permitting/Special Projects Unit
 Phone (213) 576-6657
 Fax (213) 576-6660
 aanijelo@waterboards.ca.gov

Playa Vista Groundwater Cleanup Project CAG914001; Order No. 2007-0022; CI-6839

Year	Total Discharge in gallons
1996	43,301,400
1997	8,863,200
1998	14,874,960



Discharge Point	Permitted Discharge Gallonage
1	500 kgpd*
3	28.8 kgpd*
4	28.8 kgpd*
5	1 kgpd*
6	1 kgpd*
7	21 kgpd*
11	21 kgpd*
TOTAL	601.6 kgpd*
Proposed Addition	
12	100 kgpd*
TOTAL	701.6 kgpd*

Legend
 X Permitted Discharge Point
 ● Proposed Discharge Point



NOT TO SCALE

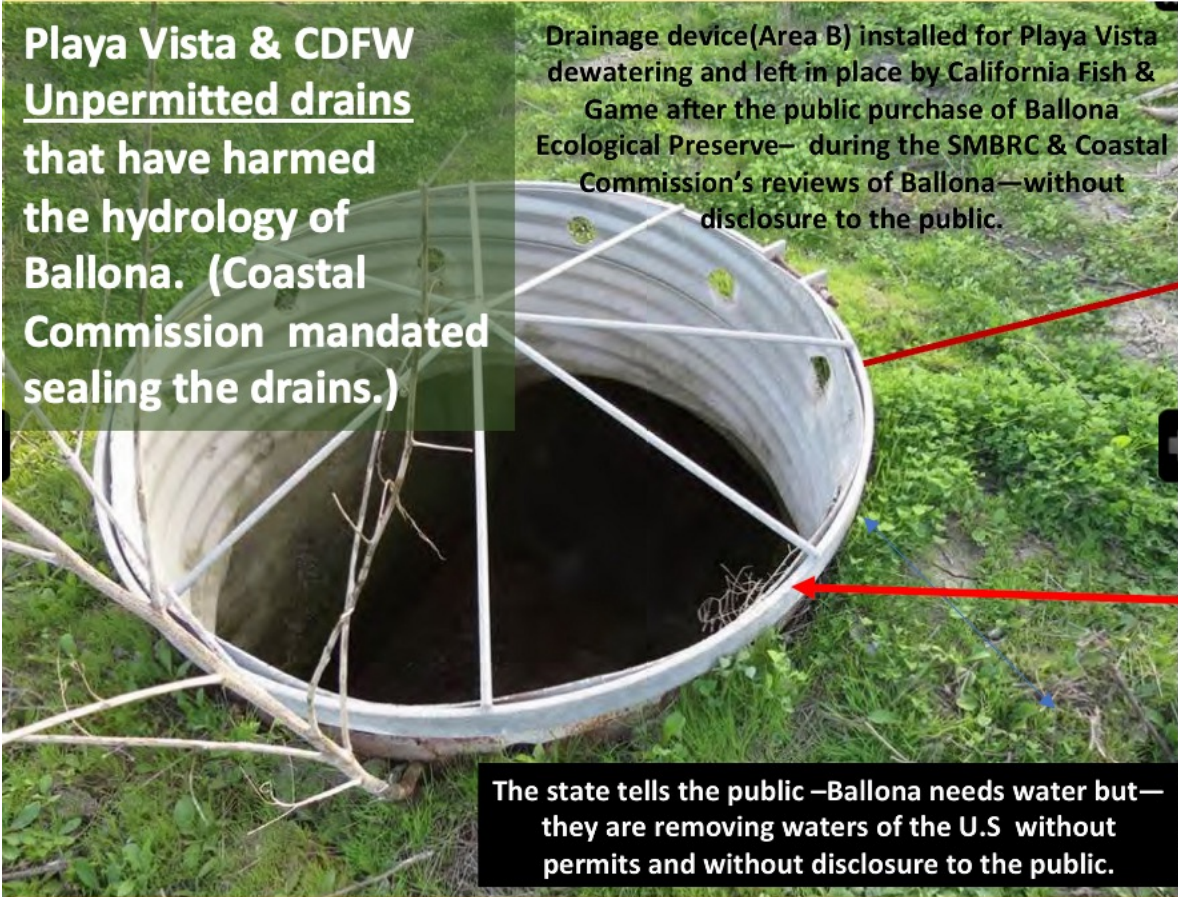
*kgpd = 1000 gallons per day

WATER BALANCE FOR THE PROPOSED FRESHWATER WETLAND SYSTEM, PLAYA VISTA by Camp Dresser & McKee Inc. 1991 discusses this available freshwater for Ballona Wetlands, including post remediation availability of the clean freshwater for sustaining Ballona Wetlands ecosystems. **CDFW does not include this information in its environmental studies for Ballona Wetlands Ecological Reserve**

INTEGRATED Environmental Services, Inc. 30 Fairbanks, #187 Culver, CA 92018-1824 (949) 450-7000
 TITLE: Permitted and Proposed Discharge Points NPDES Permit # CAG994002

Playa Vista Site
 5775 Centinela Avenue
 Los Angeles, California 90048
 DATE: 2/18/01
 BY: [Signature]
 PROJECT NO: [Number]
 DRAWING NO: [Number]
 SHEET NO: 2

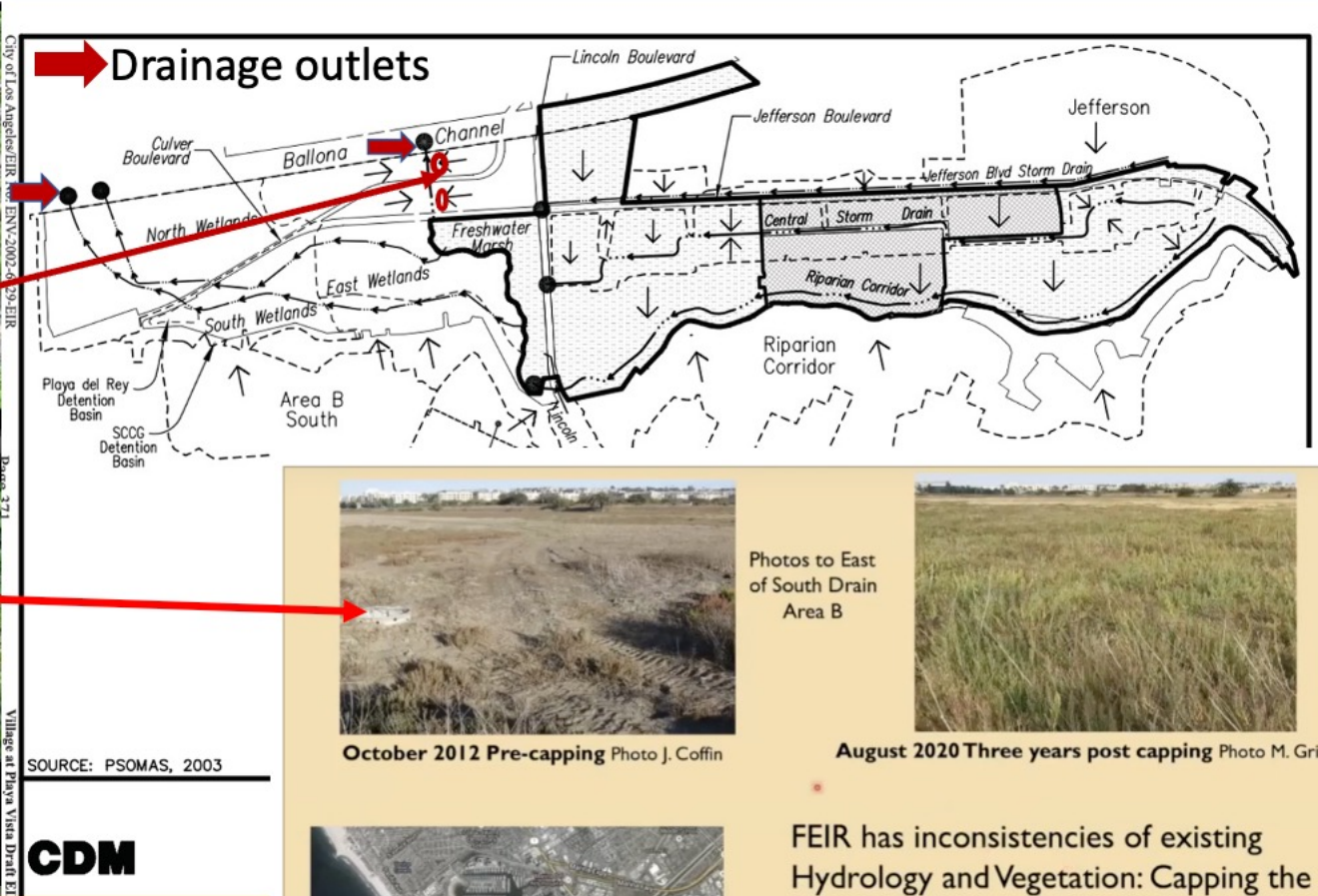
Playa Vista Freshwater Drainage Created By Playa Vista and Used By Playa Vista and CDFW to Drain Ballona's Freshwater Seasonal Ponding



Playa Vista & CDFW Unpermitted drains that have harmed the hydrology of Ballona. (Coastal Commission mandated sealing the drains.)

Drainage device (Area B) installed for Playa Vista dewatering and left in place by California Fish & Game after the public purchase of Ballona Ecological Preserve— during the SMBRC & Coastal Commission's reviews of Ballona—without disclosure to the public.

The state tells the public—Ballona needs water but—they are removing waters of the U.S without permits and without disclosure to the public.



October 2012 Pre-capping Photo J. Coffin



August 2020 Three years post capping Photo M. Griswold



FEIR has inconsistencies of existing Hydrology and Vegetation: Capping the unpermitted drains in B north resulted in native pickleweed wetland habitat.

Unpermitted drains in Area B in currently preserved areas that support wetland vegetation once drains were capped.

SOURCE: PSOMAS, 2003
CDM

CDFW & Playa Vista: DRAIN FRESHWATERS OF BALLONA= Violation of the Coastal Act & Unpermitted 2004-2017

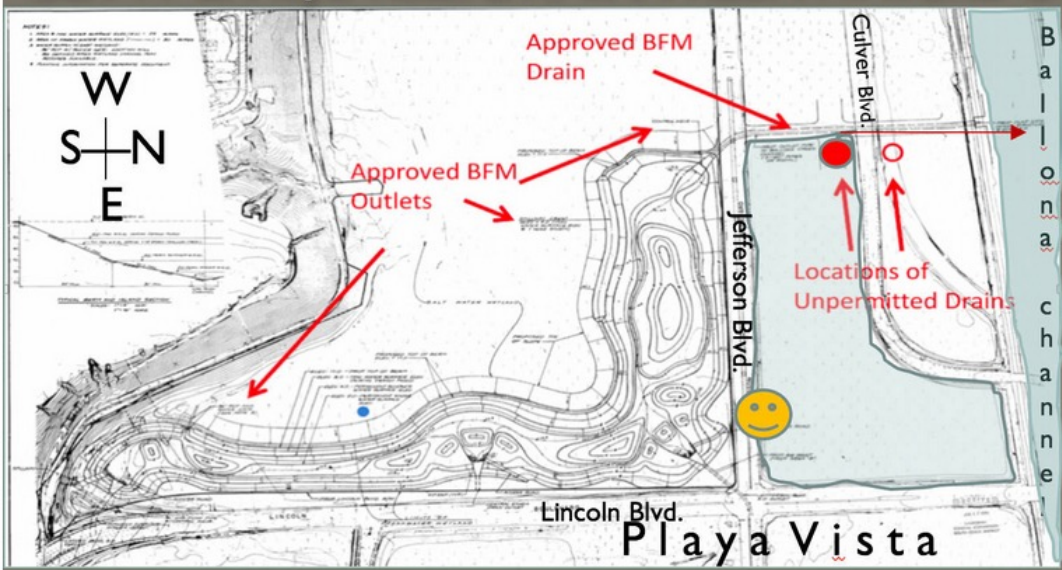


Photo location, Continued Draining



1-22-17 submerged drain

Ballona Wetlands Ecological Reserve



10-16-12

Roughly 100,000-200,000 cubic feet of water is thrown away each rain event shown.



2-17-17 Again submerged



1-23-17 Rainwater has been drained into Ballona Channel



Drain

The Wildlife Conservation Board approved funding for a LAND MANAGEMENT PLAN for Ballona Wetlands. It has not been done. A timely LMP is required under Fish & Game Code 1019 for new Ecological Reserves. No LMP has been done. CDFW's LMP protocol provides for surface/groundwater interaction as outlined in CDFW's protocol for Groundwater Dependent Ecosystems.

We request all stop on public trust property of Ballona ER and the Expanded Wetlands Parcel until a full GSP/LMP is performed.

No hydrology studies of Ballona Wetlands itself have been done to determine the negative impacts of the cumulative freshwater dewatering to Ballona Wetlands as can be noted in the following document portion produced by a member of the Project Management Team in the current EIR/S; Water Resource Development Act (WRDA) process. (Public Record Act response document)

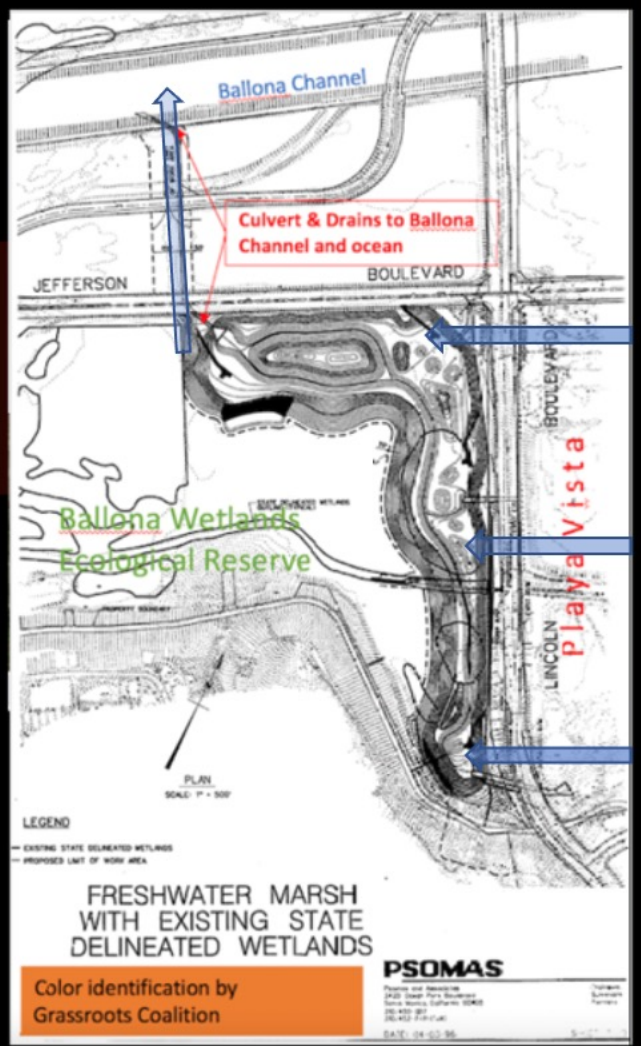
5670662	Geotechnical	Appendix B – Geotechnical Memorandum	n/a	n/a
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Comment Classification: **For Official Use Only (FOUO)**

What is the groundwater condition at the project site?

Submitted By: [David Tran](#) (213-452-3563). Submitted On: Jun 05 2014

Evaluation not conducted



BALLONA WETLANDS ECOLOGICAL RESERVE IS A

Playa Vista is a very different from most jobs. Typically, you measure depth to get to average soil. At Playa Vista, being an old marsh basin, going deeper gets you to softer materials. - Billys Playa Vista email to Los Angeles Building and Safety Department

BALLONA WETLANDS 1997

GROUNDWATER DEPENDENT ECOSYSTEM

The State Groundwater Management Act (SGMA) requires that all beneficial uses and users of groundwater be considered in Groundwater Sustainability Plans. GSP



1998 DEPARTMENT of the INTERIOR. US FISH & WILDLIFE Expressing Concerns for Maximum Restoration Benefits and the Failure of the Army Corps to Coordinate With USFWS on the 1135 Projects- Levee Outlets to Ballona Channel



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Field Office
2730 Laker Avenue West
Carlsbad, California 92008



AUG 4 1998

Colonel Robert L. Davis
District Engineer, Los Angeles District
U.S. Army Corps of Engineers
P.O. Box 532711
Los Angeles, California 90053-2325

Attn: Ruth Villalobos

Re: Ballona Wetland Section 1135 Project, Los Angeles County, California

Dear Colonel Davis:

The U.S. Fish and Wildlife Service (Service) has reviewed the May 28, 1998, draft report describing the referenced project. This letter responds formally on the draft report.

Reportedly, the landowner and resources agencies support the referenced project provided that it does not interfere with the future restoration of adjacent wetlands nor require the landowner to mitigate for any improvement to the on-site baseline of species listed under the Endangered Species Act (Act). Local environmental groups, Heal the Bay and Friends of Ballona, also support the project because any long-term restoration plan is too far off to provide any immediate help for the degraded wetlands. Though we support the former concern, the baseline issue likely would need to be dealt with pursuant to the joint draft policy on "Safe Harbor" with the National Marine Fisheries Service and Fish and Wildlife Service (62 FR 32178). Regardless, impacts to any federally listed species, enhanced or not, would still need to comply with the Act.

The Corps and Service are currently involved in litigation regarding the land where the proposed project is located. A recent court decision rescinded the Corps permit for development and wetland mitigation on a portion of this same property, indicating a completed Environmental Impact Statement (EIS) for the entire property was warranted before development on any portion could proceed. In addition, a regulatory EIS is now being prepared for the project area. The Service strongly supports long-term habitat restoration projects. Because of the extensive comprehensive planning for wetland restoration that has occurred and is ongoing, any proposed project would have to be compatible with any larger or long-term plan. Moreover, the Service maintains that the Ballona wetlands need to be addressed in a comprehensive manner to realize maximum restoration benefits. In this regard, Russ Kaiser of your staff indicated that the project had been scaled back to 5-10 acres to ensure that it would be compatible with and not preclude any long-term planning.

Col. Robert L. Davis

-2-

AUG 4 1998

In conclusion, based on the information provided in the draft report, and clarifying conversations with your staff, the Service generally supports this proposed 1135 project. We note that because section 1135 funds are scarce, we assume the Corps has determined that other restoration opportunities do not exist that could provide greater benefits for fish and wildlife resources.

We hope that the Corps will improve upon future efforts to coordinate with the Service on section 1135 projects. The Corps indicated in the draft project report that they would only fund the Service to prepare a Fish and Wildlife Coordination Act (Coordination Act) report addressing existing conditions, alternatives analyses, and final recommendations. This report would be prepared after the project alternative is selected. The existing conditions and alternatives analyses are typically presented in planning aid reports during the development of the project alternative. According to the Coordination Act, the Corps should coordinate with the Service early on and during the entire planning process of a water resources development project. Pursuant to the National Transfer Funding Agreement, which implements the requirements of the Coordination Act, we believe this process has been severely truncated for this 1135 project. We believe any water resource development project, including a comprehensive plan for Ballona wetlands, warrants early Service involvement as set forth in the Transfer Funding Agreement, including preparation of the appropriate planning documents, alternatives analysis, and finally a Coordination Act Report for a comprehensive plan.

If you have any questions, please feel free to contact John Hanlon, Chief, Branch of Federal Projects, at (760) 431-9440.

Sincerely,

Len S. Berg
Len S. Berg
Field Supervisor

red arrows show USACE 1135 levee projects
The draining of Ballona's freshwater and failure to address saltwater intrusion upon Ballona's aquifers per the Clean Water Act; California's Porter Cologne Act

There was a lack of legally required coordination with USFWS which would have allowed for discussion of other restoration opportunities. USFWS cites a need for an EIS on the entire property before development of any portion. **TODAY: Existing conditions of Ballona's sustainable freshwater resources are still not addressed or protected by CDFW.**

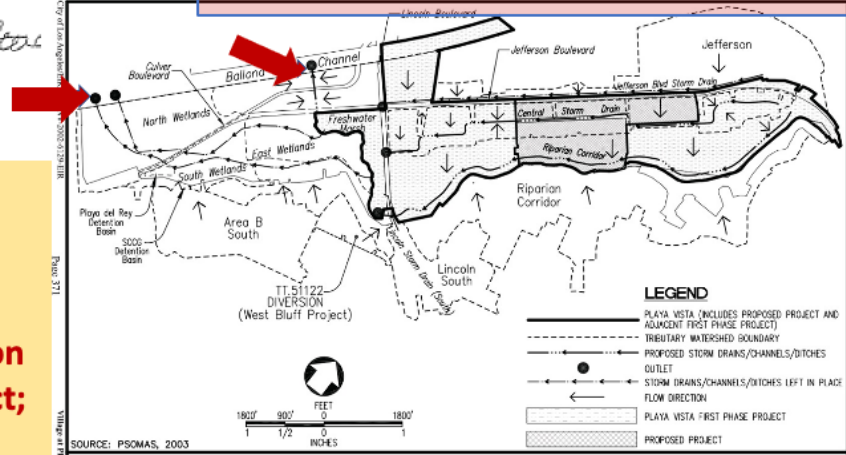


Figure 32
Drainage System and Associated Hydrology with Adjacent Playa Vista First Phase Project and Proposed Project

US EPA- FINAL REPORT 1986 Determination of the Presence of Aquatic and Wetland Habitats Subject to Federal Regulatory Jurisdiction Within the Ballona Creek Land Tract,

Prepared for USEPA, Region IX by Terry Huffman, Phd, Huffman Technologies Co.

-Clean Water Act jurisdiction may be assumed for all of the aquatic and Wetland areas found. P.1

- The lands are subjected to some drainage and flood and tidal protection but have not been converted into dry lands. P.2

-Hydrologic Conditions. At higher elevations saturated soil conditions occur as a result of heavy rainfall retention during portions of the early growing season (December to April) by heavy soils of low permeability. This, combined with a seasonal shallow ground water table, causes saturated soil conditions within the root zone to occur for several months during most years. P.10

-Wetland Areas. The principal type of wetlands found is commonly referred to as “pickleweed marsh” wetlands. P. 15

-Vegetation. ...anaerobic soil conditions are such that the typical crops planted, such as lima beans, cannot be successfully planted and harvested until late spring when the saturated soil conditions have subsided.

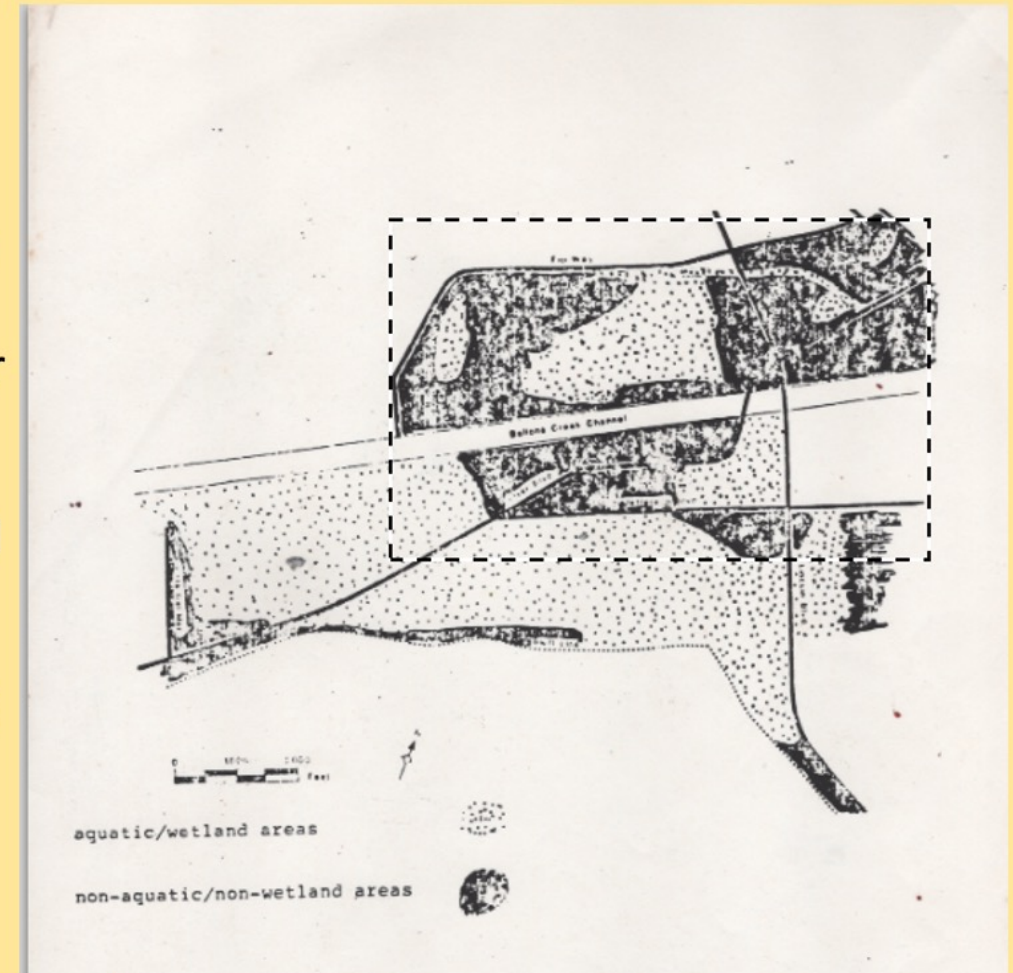


Figure 4. General Location of Non-aquatic/Non-Wetland Areas and Aquatic/Wetland Areas Found Within the Ballona Creek Land Tract. Base Map Source: U.S. Army Corps of Engineers, Los Angeles, District.

The report clearly indicates the seasonal freshwater nature of Ballona and the ability of the soils to retain moisture when inundation from seasonal rains dissipates.



patricia me



Playa Vista Phase II 3/22/03

Ballona Wetlands Flooded

0:48 / 2:15



Playa Vista Phase II 3/22/03
Ballona Wetlands Flooded



Playa Vis



Playa Vista Phase II 3/22/03

Playa Vista pumps away the ponding rainwater and pumps out groundwater throughout its development project

- What is Rare Regional Habitat?
- Coastal predominantly seasonal freshwater wetlands / upland complexes; salt flats/pans , salt marsh; Belding's Savannah Sparrow and the whole suite of species currently calling Ballona HOME.

Meeting with Sam Schuchat

Full Tidal Restoration Threatens Southern California Native Biodiversity

In southern California, perennially open, fully tidal estuaries are not natural, except for San Diego Bay. Coastal Conservancy funded research has revealed historical records showing that Mugu Lagoon, Agua Hedionda, Batiquitos, Los Peñasquitos, San Diegito, and Bolsa Chica were all closing systems, at least for part if not most of the year, prior to widespread human alteration (mid to late 1800s). This new information falsifies the studies that connected tidal prism to opening frequency.

As a consequence of regular closure and dominance of freshwater inputs over tidal flows, the natural history of organisms in these estuaries is tied to this pattern of closing and the natural features that develop with this hydrology (e.g., salt flats, alkali meadows, upstream riparian zones) rather than to conditions associated with fully tidal, perennially open systems. Examples of specialists in closing systems include tidewater goby, southern steelhead (juveniles), and the endemic sea slug *Alderia willowi*. Furthermore, periodically flooded wet meadows support their own endemic species such as south coast marsh vole and southern California salt marsh shrew. Other species dependent on these habitats specialize in the dense bullrushes and willows that form in the upstream zones (e.g., south coast garter snake, willow flycatcher).

Wetland creation projects that create fully tidal wetlands where they are not supported by the natural hydrology have the following adverse consequences:

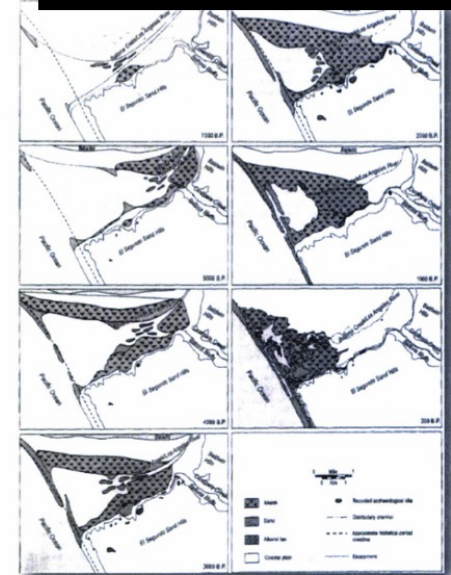
1. Extremely expensive to maintain because they require frequent dredging.
2. Lowered water table and drying of upstream wetland habitats.
3. Loss of habitat and extirpation for specialist endemic species.
4. More release of bacteria to beaches during the summer.



Ballona Wetlands Were Not Fully Tidal and Should Not Be Turned Into Full Tidal Wetlands

Historical records are clear that Ballona Creek only emptied to the ocean during the winter under rainy conditions. Otherwise, the system is completely non-tidal. Ballona Lagoon was a true lake through the 1800s, until it was jettied open in 1887. It was not an open bay, which has not been present at Ballona for at least 2,000 years. Historic surfaces at Ballona are intertidal or above high tide. Many areas would have been wet in the winter and dry in the summer (which is how the salt pan formed). Creation of a fully-tidal system from whole cloth will harm the sensitive endemic species found at the site (e.g., south coast marsh vole, southern California salt marsh shrew), the upland and transition zone species (including fully protected white-tailed kite, and loggerhead shrike). The Ballona project is being driven by outdated goals (maximize tidal flow and estuarine habitat) that should have been revised in light of recent scientific advances in historical ecology.

Written by Travis Longcore
PhD



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.

