

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
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Th25b

Filed:	10/16/2016
180 th Day	04/13/2016
Staff:	M. Revell-LB
Staff Report:	02/18/2016
Hearing Date:	03/10/2016

STAFF REPORT: REGULAR CALENDAR

Application No.: 5-15-1427

Applicant: California Department of Fish and Wildlife

Agent: The Bay Foundation

Location: Ballona Wetlands Ecological Reserve, Area B South, Playa Del Rey, Los Angeles County

Project Description: Removal of invasive iceplant from a 3 acre area within the Ballona Wetlands Ecological Reserve south of Culver Blvd., utilizing solarization techniques over a two month time period. Project area to be restored through natural native species recruitment, and some container plantings if necessary.

Staff Recommendation: Approval with conditions

SUMMARY OF STAFF RECOMMENDATION

The applicant is proposing to remove non-native *Carpobrotus* spp., or iceplant, from a targeted 3-acre area within the Ballona Wetlands Ecological Reserve known as Area B, south of Culver Boulevard in Playa Del Rey. Solarization of iceplant monocultures will be the primary removal method, which utilizes large black plastic sheeting to eliminate radiant sunlight while heating it, which kills and dries the iceplant. Removing iceplant on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort currently underway.

The proposed project raises issues regarding environmentally sensitive habitat areas and sensitive species. Staff is recommending **APPROVAL** of a permit for the proposed development with special conditions regarding: 1) timing of operations; 2) the submittal of a plan to monitor and remove invasive non-native plants from the project area; and 3) disposal of materials. As

conditioned, the proposed development conforms with all applicable policies of the Coastal Act. The applicant is in agreement with the staff recommendation.

Section 30600(c) of the Coastal Act provides for the issuance of coastal development permits directly by the Commission in regions where the local government having jurisdiction does not have a certified Local Coastal Program. The City of Santa Monica only has a certified Land Use Plan and has not exercised the options provided in 30600(b) or 30600.5 to issue its own permits. Therefore, the Coastal Commission is the permit issuing entity and the standard of review is Chapter 3 of the Coastal Act. The certified Land Use Plan may be used for guidance.

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EXHIBITS

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Exhibit 2 – Map of Project Location

Exhibit 3 – Project Location with Wetland Delineation Overlay

Exhibit 4 – Photo of Iceplant Monoculture

Exhibit 5 – Letters in Support of Project

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** the coastal development permit applications included on the regular calendar in accordance with the staff recommendations.*

Staff recommends a **YES** vote. Passage of this motion will result in approval of all of the permits included on the consent calendar. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS:

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS:

This permit is granted subject to the following special conditions:

1. **Timing of Operations.** The project operations, including vegetation eradication and removal, hauling, annual maintenance and spot removal shall be prohibited from February 1 through August 30 to avoid impact to avian species during breeding season.

2. **Plan to Monitor the Disturbed Area and Remove Invasive Non-native Plants**

A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant will submit, for the review and written approval of the Executive Director, a plan to monitor the area targeted for invasive removal. The plan shall include procedures for identification and removal of non-native invasive plants that may be found in the area. The plan shall be reviewed and approved by, the California Department of Fish and Game prior to being submitted to the Executive Director for review and approval. The plan shall include the following:

1. Vegetation planted on the site shall consist of native plants typically found in the Ballona Wetlands.
2. Invasive plants are those identified in the California Native Plant Society, Los Angeles -- Santa Monica Mountains Chapter handbook entitled *Recommended List of Native Plants for Landscaping in the Santa Monica Mountains*, January 20, 1992, those species listed by the California Invasive Plant Council on any of their watch lists as published in 2007, and those otherwise identified by the Department of Fish and Wildlife or the United States Fish and Wildlife Service. No non-native or invasive species shall be employed on the site.
3. All non-native invasive plants shall be removed with hand tools.
4. No herbicides or rodenticides shall be employed.

B. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

C. Two years from the date of issuance of Coastal Development Permit No. 5-15-1427, the applicant shall submit for the review and approval of the Executive Director, a monitoring report, prepared by a licensed biologist or landscape architect with expertise in

wetland restoration that indicates the progress of the natural revegetation of the impacted area. The monitoring report shall include photographic documentation of plant species, plant coverage and an evaluation of the natural restoration of the site.

3. Disposal of Materials

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall provide evidence to the Executive Director of the location of the disposal site for all material removed from the project site. All materials and debris shall be deposited at an approved dumping location either outside the coastal zone or to a site within the coastal zone permitted to receive such material.

IV. FINDINGS AND DECLARATIONS:

A. PROJECT DESCRIPTION & LOCATION

The applicant is proposing to remove non-native *Carpobrotus* spp., or iceplant, from a targeted 3-acre area within the Ballona Wetlands Ecological Reserve, south of Culver Boulevard in Playa Del Rey, in Los Angeles County. Solarization of iceplant monocultures will be the primary removal method, which utilizes large black plastic tarps to eliminate radiant sunlight from reaching the iceplant while heating it, which kills the iceplant. No herbicides will be utilized.

The project area is located in a portion of the Ballona wetlands known as Area B, which covers approximately 385 total acres and extends from Lincoln Boulevard west to developed properties along Vista del Mar, and north from the Westchester bluffs to the Ballona Creek Channel. Today, the Ballona Wetlands are remnants of a much larger wetland system that historically covered over 2,000 acres from Playa Del Rey to Venice. Although development within Area B (oil drilling, pipelines, road construction, and farming) left only portions of the area containing wetlands, all of the remaining wetland areas in this location are considered environmentally sensitive habitat areas and provide habitat for many species of marine fish, migratory shore birds, and endangered species, including the California least tern and Belding's savannah sparrow.

The tarps will remain in place for approximately two months or less outside of nesting and breeding season as an extra precaution, even though the restoration will not occur within Belding's Savannah Sparrow or California Least Tern habitat. Access to the restoration area will be accommodated through CDFW's parking lot for the Ballona Reserve off of Culver Boulevard. Participants will walk north along the Culver Blvd. sidewalk, cross at the Nicholson crosswalk, and then proceed to the immediately adjacent corner of the Reserve to enter the restoration area. All ingress and egress from the site will either be on pre-existing trails, or on top of the iceplant monoculture (or other invasive vegetation species). Restoration efforts will be carefully observed and supervised by biological monitors present on site at all times. No adverse impacts are anticipated to result to small mammals, reptiles, or other fauna that may exist in the iceplant. However, as a precautionary measure, multiple gaps are proposed to be located between the garden staples that anchor the tarps to the substrate, thereby allowing those organisms to escape if necessary. Similar successful projects conducted in other coastal locations utilizing the same solarization techniques, (i.e. Carpinteria Creek Mouth project in Carpinteria, and Channel Islands Restoration projects in Santa

Cruz and Anacapa Islands), have not encountered any incidental deaths of vertebrates after implementation of the tarps. In fact, the tarps often function as a warm, moist shelter for snakes and lizards, which have been discovered when the tarps are removed. Also, a similar iceplant solarization project was conducted in an adjacent location within the Ballona Wetlands in 2008, which was successful in eradicating the iceplant, and restoring native vegetation, thereby improving habitat quality. The project is supported by the California Coastal Conservancy, the State Lands Commission and the Department of Fish and Wildlife as part of a larger scale wetlands restoration effort.

B. ENVIRONMENTALLY SENSITIVE RESOURCES

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30240(a) of the Coastal Act states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

Sections 30230 and 30231 of the Coastal Act require that the biological productivity and the quality of coastal waters and streams be maintained and, where feasible, restored through among other means, minimizing adverse effects of waste water discharge and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flows, maintaining natural buffer areas that protect riparian habitats, and minimizing alteration of natural streams. In addition, Section 30240 of the coastal Act states that environmentally sensitive habitat areas must be protected against disruption of habitat values.

The Ballona wetlands area, including Area B, is owned by the Department of Fish and Wildlife. Presently the California Coastal Conservancy, the State Lands Commission and the Department of Fish and Game are developing a restoration plan to create a variety of native habitats in the Ballona Wetlands and associated upland areas, which includes about 600 acres owned by the State of California on both sides of Ballona Creek. Meetings with stakeholders, development of goals, and biological assessments began in the fall of 2005, and the site has been identified as a regional priority for restoration because of its potential as an outstanding habitat area.

Iceplant is a non-native, drought resistant plant, which is highly invasive in many of California's coastal communities. Once iceplant is established, very few other plants can survive in the same location. Because of its "creeping" growth pattern, iceplant can grow into deep mats of vegetation, which easily out-competes native plants for water, space, and light. As a succulent, iceplant absorbs and stores water and nutrients from the soil, making survival much more difficult for native plants. Iceplant essentially crowds out native vegetation, reducing plant diversity and destroying habitat for native wildlife, which utilize the native plants for food and shelter. Removing iceplant on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort to improve the habitat quality of this ecosystem.

As stated, solarization is proposed to be the primary method of iceplant removal. Solarization is a minimally-invasive method of eradicating non-native plant species, because it allows for the removal of iceplant without the use of herbicides or heavy soil disturbance. With the assistance of volunteers, the applicant proposes to place large black tarps across iceplant monoculture, anchored to the substrate with garden staples, leaving spaces of approximately 1 foot in between the staples to allow for the small-scale movement of small mammals and reptiles that may be underneath the tarps. The dead and dried iceplant will be left in place to minimize soil disturbance and the likelihood of invasive annual vegetation germinating in the restored areas. Additionally, leaving the desiccated iceplant on site also allows for the preservation of culturally-sensitive areas. The methods described above will leave any such existing resources in place. According to the applicant, appropriate Native American tribal representatives have been consulted and suitable best management practices will be in place to assure the integrity of artifacts if encountered, should revegetation be needed.

Additionally, the desiccated iceplant material will act as natural mulch in the restoration areas, which will help to control non-native species invasions, while keeping the soil moisture high for native plants. In a few areas within the project site, the iceplant is growing in "patches" adjacent to native vegetation. In these instances, eradication methods may also involve a small amount of additional hand pulling of invasive species by volunteers along the margins of the iceplant monocultures where solarization cannot be utilized. This will avoid impacts to existing native salt marsh vegetation.

Wetland habitats at Ballona have been heavily disturbed and most are hydrologically disconnected from estuarine waters. Retaining moisture in the soils through the use of this "mulch" will encourage native salt marsh regrowth, reducing the need of container plantings for restoration purposes. Previous studies of the soils beneath the existing iceplant monoculture demonstrate the

presence of a native seed bank which will have a chance of growing once the iceplant is eliminated in these locations.

Due to past development within Area B, including oil drilling, pipelines, road construction, and farming, only portions of the area contain wetlands (see **Exhibit 2** Map of wetland areas, based on the wetlands delineation conducted by Wetland Research Associates for the Coastal Conservancy in 2011). However, all wetland areas within the Ballona wetland area are considered environmentally sensitive habitat areas and provide habitat for many species of marine fish, migratory shore birds, and endangered species, including the California least tern and Belding's savannah sparrow. Because of the existence of the wetland and an environmentally sensitive habitat area, the development in Area B must be found consistent with Sections 30231 and 30240 of the Coastal Act.

The proposed project consists of the enhancement of the wetland habitat through the removal of invasive iceplant throughout Area B. The extent of iceplant to be targeted falls in both non-delineated and delineated wetland. As described above, removal and eradication of iceplant at these locations will be achieved using solarization and some hand-pulling. To ensure the restoration effort is successful, the applicant proposes to monitor the site and manually remove all new invasive seedlings during the following two years as imposed by **Special Condition 2**. The sites are anticipated to be revegetated with native plant regrowth from existing seed stock present in the soil, and some container plantings. This eradication of invasive iceplant will serve to restore and enhance existing degraded habitat resources.

The Commission finds that the proposed project will serve to restore and enhance degraded wetland habitat in the Ballona Wetlands. As conditioned, the project will not have an adverse impact on the wetlands, and is consistent with Section 30230, 30231 and 30240 of the Coastal Act.

C. LOCAL COASTAL PROGRAM

Section 30604 (a) of the Coastal Act states that:

Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3.

In November 1986, the Commission certified, with suggested modifications, the land use plan portion of the Playa Vista segment of the City of Los Angeles' Local Coastal Program after the City annexed the area. The proposed project is located within the City of Los Angeles' planning area of Playa Vista. While there is a certified land use plan for the area, the City of Los Angeles does not have a certified Local Coastal Program for the Playa Vista area. The City of Los Angeles

submitted its Local Coastal Program in March 1981. The Commission denied the submitted LCP on December 18, 1981. The City has not submitted a revised LCP.

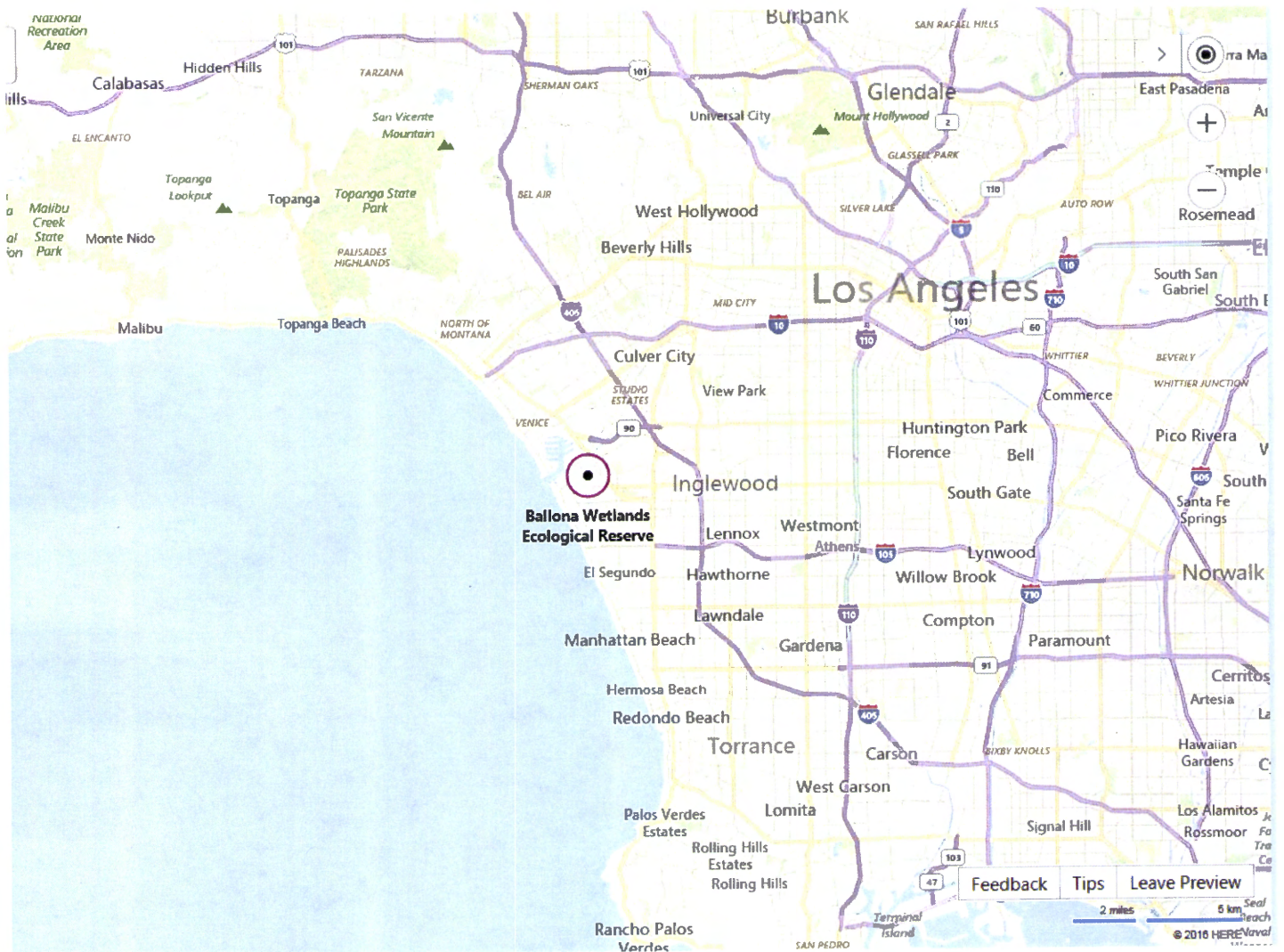
The Ballona wetlands area, including Area B, has been acquired by the Department of Fish and Wildlife. Presently the California Coastal Conservancy, the State Lands Commission and the Department of Fish and Game are developing a restoration plan to create a variety of native habitats on the Ballona wetlands and associated upland areas, including the project site. This larger restoration project area includes about 600 acres owned by the state of California on both sides of Ballona Creek. Meetings with stakeholders, development of goals, and biological assessments began in the fall of 2005. The proposed project does not change any land use or any planning decision regarding the restoration of the marsh. The project as proposed and conditioned will not have any impacts on the marsh and is consistent with the habitat policies of the Coastal Act. The Commission, therefore, finds that the proposed project is consistent with the Chapter 3 policies of the Coastal Act and will not prejudice the ability of the City to prepare a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

D. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13096(a) of the Commission's administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect which the activity may have on the environment.

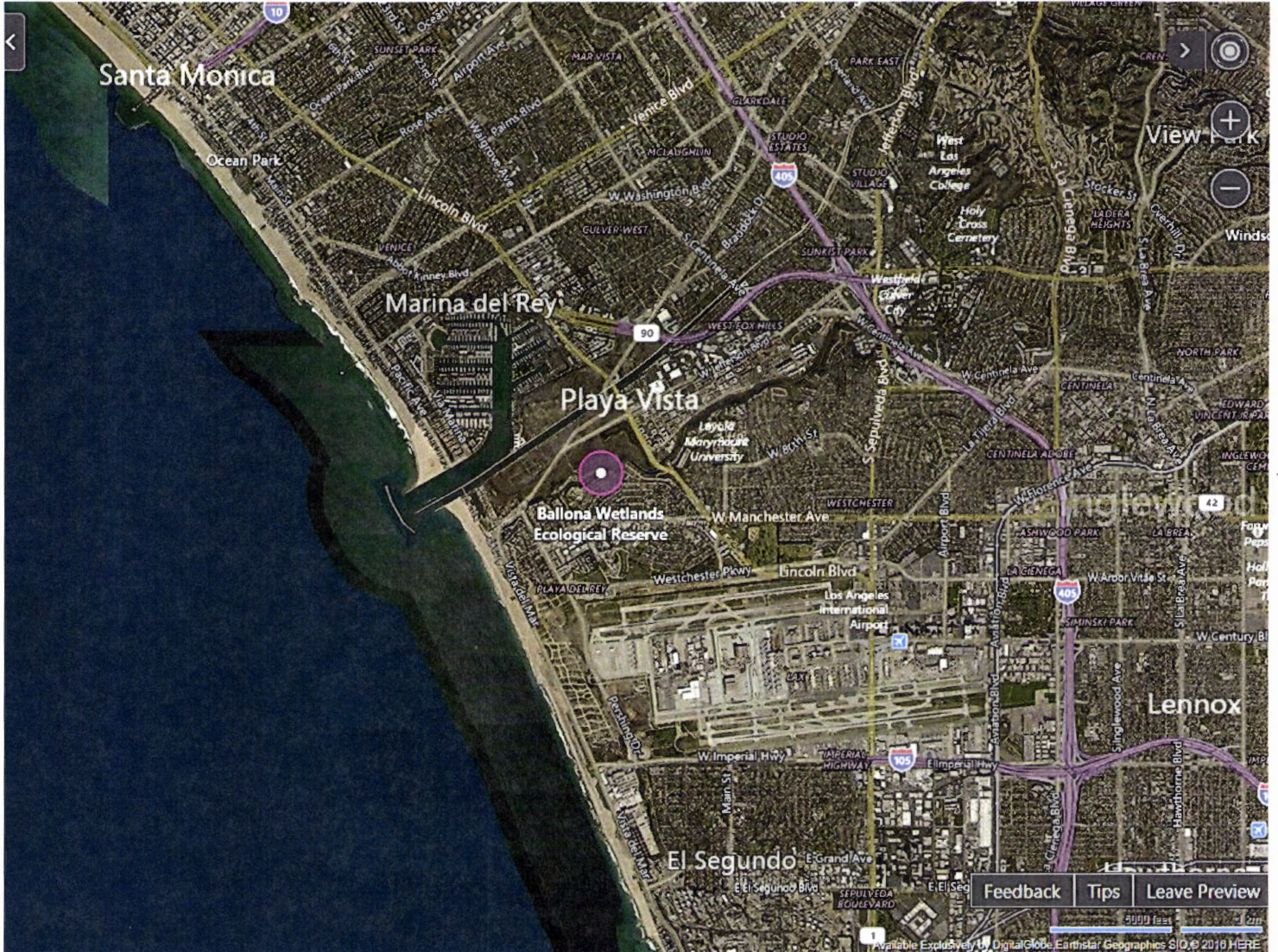
Appendix A - Substantive File Documents

- Certified Playa Vista Land Use Plan, City of Los Angeles, 1986.
- Coastal Development Permit Application No. 5-15-1427



COASTAL COMMISSION

EXHIBIT # 1
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COASTAL COMMISSION

EXHIBIT # 1
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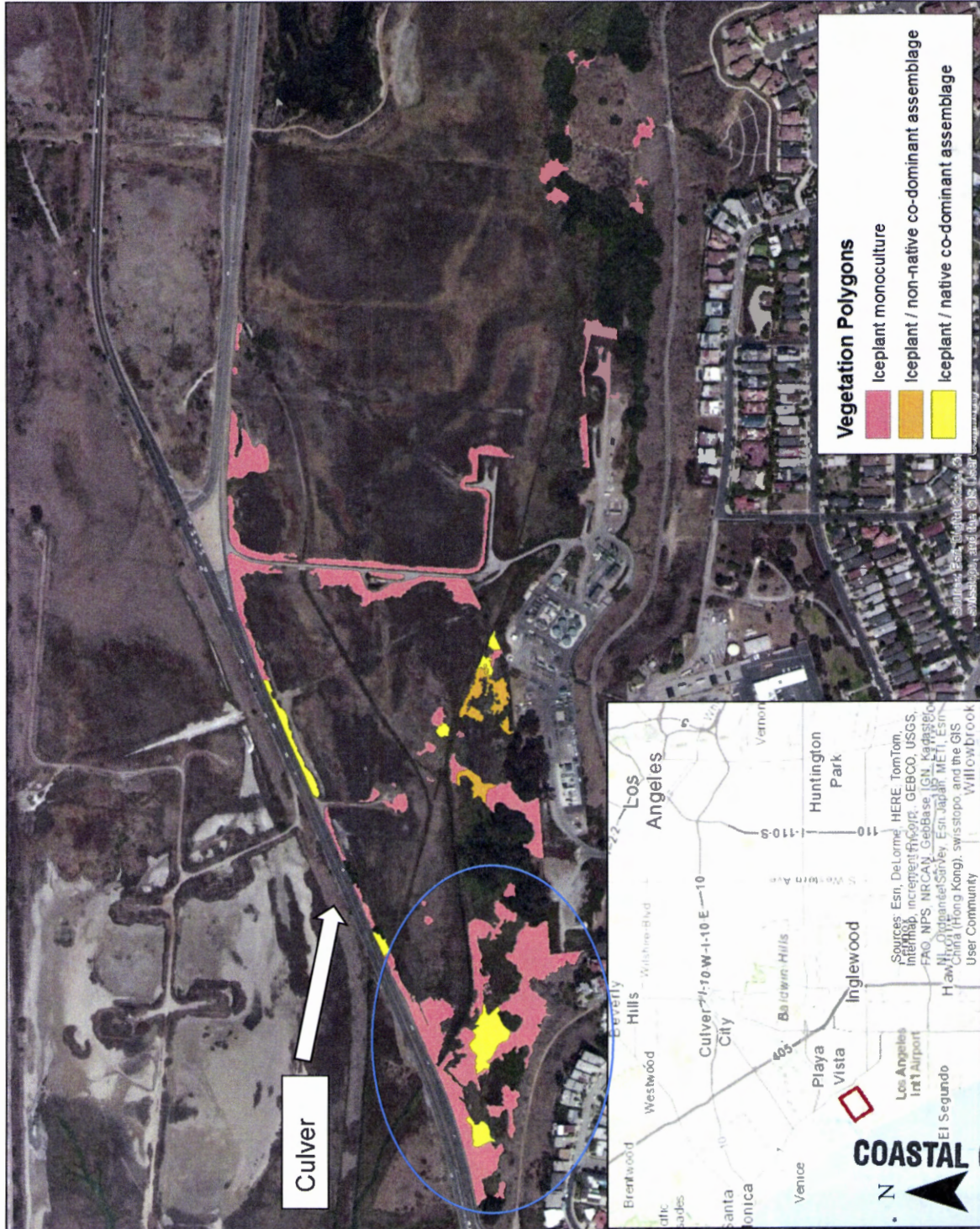
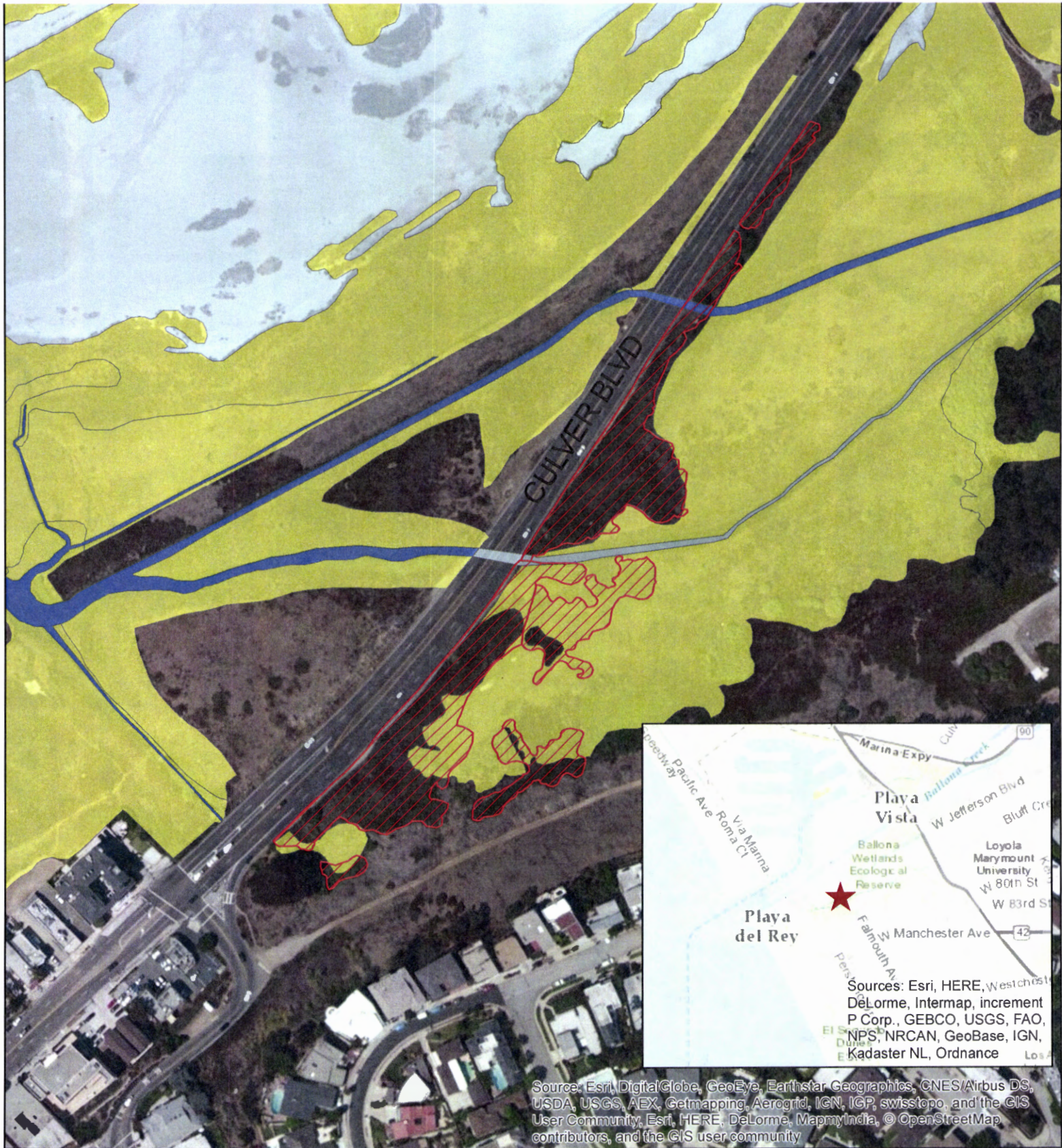


Figure 1. Map of the location and distribution of iceplant assemblages south of Culver Boulevard within the Reserve. Blue circle indicates target area.





COASTAL COMMISSION

EXHIBIT # 4
PAGE OF

Received 2/2/16



California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

2 February 2016

Subject: Support Letter for TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission:

The State Coastal Conservancy enthusiastically supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). A small portion of Reserve is still functioning somewhat as a wetland, yet much of this area is currently covered in invasive plant species, effectively reducing what limited ecological functions remain after a more than a century of sediment dumping, development, ranching, farming, and mineral extraction. The ecological impacts of invasive weeds include competition with native species, alteration of food webs, preemption of resources, and alteration of soil chemistry.

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

Sincerely,

Joan Cardellino
South Coast Region Program Manager
State Coastal Conservancy

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

COASTAL COMMISSION

EXHIBIT # 5 13th Floor
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510-286-1015 Fax: 510-286-0470



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



California Coastal Commission
South Coast Area Office
200 OceanGate, Suite 1000
Long Beach, CA 90802-4302

December 3, 2015

Subject: Support Letter for Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission:

The California Department of Fish and Wildlife (CDFW) is an enthusiastic partner on the invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). A small portion of Reserve is still functioning somewhat as a wetland, yet much of this area is currently covered in invasive plant species, effectively reducing what limited ecological functions remain after a more than a century of sediment dumping, development, ranching, farming, and mineral extraction. The ecological impacts of invasive weeds include competition with native species, alteration of food webs, preemption of resources, and alteration of soil chemistry.

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

CDFW and The Bay Foundation will be partnering with members of the community and with other environmental non-profit groups. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

Please consider approving and moving forward with the Coastal Development Permit.

Sincerely,

Ricard Brody, Land Manager, Ballona Wetlands Ecological Reserve
California Department of Fish and Wildlife

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation

COASTAL COMMISSION

EXHIBIT # 5
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California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

4 December 2015

Subject: Support Letter for Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission:

The Southern California Wetlands Recovery Project supports and is in fact a funder of The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). A small portion of Reserve is still functioning somewhat as a wetland, yet much of this area is currently covered in invasive plant species, effectively reducing what limited ecological functions remain. The ecological impacts of invasive weeds include competition with native species, alteration of food webs, preemption of resources, and alteration of soil chemistry.

The project focuses on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., earth moving) during restoration efforts. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. The iceplant removal, and subsequent introduction of native wetland species, will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

TBF and CDFW is partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience on this project. As well as being funded by my Program, the project is benefiting from volunteer efforts and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts. I ask that you consider the scale and spirit of this project and permit it without further delay which may jeopardize the project's ability to be implemented at all.

Sincerely, Shawn W. Kelly

COASTAL COMMISSION

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

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Friends of Ballona Wetlands

www.ballonafriends.org

December 8, 2015

California Coastal Commission
South Coast Area Office
200 Ocean Gate, Suite 1000
Long Beach, CA 90802-4302

**Subject: Support Letter for TBF / CDFW Invasive Plant
Removal Project at Ballona Wetlands Ecological Reserve**

Dear California Coastal Commission:

Friends of Ballona Wetlands enthusiastically supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). A small portion of Reserve is still functioning somewhat as a wetland, yet much of this area is currently covered in invasive plant species, effectively reducing what limited ecological functions remain after a more than a century of sediment dumping, development, ranching, farming, and mineral extraction. The ecological impacts of invasive weeds include competition with native species, alteration of food webs, preemption of resources, and alteration of soil chemistry.

The project will focus on the removal of *Carpobrotus* spp., or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands (FBW) and Loyola Marymount University's Center for Urban Resilience. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and

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COASTAL COMMISSION

P.O. Box 5159, Playa del Rey, CA 90296
phone: 310.306.5994 email: info@ballonafriends.org

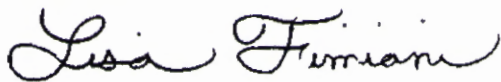
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matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

Friends of Ballona Wetlands' mission is to champion the restoration and protection of the Ballona Wetlands, involving and educating the public as advocates and stewards. For over 37 years FBW has advocated for preserving and saving the wetlands from development and implementing restoration projects. Our organization is responsible for the successful restoration of over 8 acres of dunes habitat. Through our restoration efforts over the years, over 85,000 volunteers have assisted staff in removing mostly iceplant from the dunes, bringing back the federally endangered El Segundo Blue butterfly to growing and stable populations in the Ballona Wetlands.

We are very pleased to support and be a part of The Bay Foundation and California Department of Fish and Wildlife's efforts to further improve the Ballona Wetlands!

Sincerely,



Lisa Fimiani
Executive Director

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

Center For Urban Resilience

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

15 December 2015

Subject: Support Letter for TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

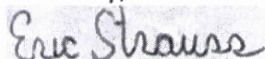
Dear California Coastal Commission:

LMU Center for Urban Resilience (CUREs) enthusiastically supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). A small portion of Reserve is still functioning somewhat as a wetland, yet much of this area is currently covered in invasive plant species, effectively reducing what limited ecological functions remain after a more than a century of sediment dumping, development, ranching, farming, and mineral extraction. The ecological impacts of invasive weeds include competition with native species, alteration of food webs, preemption of resources, and alteration of soil chemistry.

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

Sincerely,



Dr. Eric G. Strauss, PhD

Executive Director, LMU Center for Urban Resilience

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife



DEPARTMENT OF PARKS AND RECREATION
1925 Las Virgenes Road
Calabasas CA 91302

Lisa Ann L. Mangat, Director

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

January 7, 2016

RE: Support Letter for TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission:

California State Parks, Angeles District, strongly supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s community-based restoration project at the Ballona Wetlands Ecological Reserve (Reserve).

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve. Removal of iceplant and other invasive vegetation will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. The removal of invasive plants, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve.

This important interim stewardship project has the added benefit of getting the public directly involved with the Reserve and restoration efforts. TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from TBF.

We urge you to support this important community-based restoration project.

Sincerely,



Jamie King, Environmental Scientist
California State Parks, Angeles District

cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

COASTAL COMMISSION

EXHIBIT # 5
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December 11th, 2015

California Coastal Commission
South Coast Area Office
200 OceanGate, Suite 1000
Long Beach, CA 90802

RE: Support Letter for TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission,

Friends of the Los Angeles River (FoLAR), supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). Historically, this was the second mouth of the Los Angeles River prior to the 1800's and FoLAR has taken an interest in helping groups such as these to bring these native areas back to life.

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

Sincerely,

Lewis MacAdams
President/Founder

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

COASTAL COMMISSION

FoLAR

570 W. Ave 26 Suite 250 Los Angeles, CA 90065-1047
Tel: 323-223-0585
www.folar.org
E-mail: contact@folar.org

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PAGE 8 OF 18





COOPER ECOLOGICAL MONITORING, INC.
EIN 72-1598095
DANIEL S. COOPER, PRESIDENT
255 SATINWOOD AVE
OAK PARK, CA 91377
(323) 397-3562
WWW.COOPERECOLOGICAL.COM
DAN@COOPERECOLOGICAL.COM

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Re: Support letter for iceplant removal project, Ballona Ecological Reserve.

Dear California Coastal Commission:

I am writing to lend my support to the iceplant removal project proposed by The Bay Foundation and California Dept. of Fish and Wildlife at Ballona Ecological Reserve.

I have been monitoring the reserve professionally for various clients since 2003, been documenting the changes in the avifauna here. Sample publications include:

Cooper, D.S. 2011. Two recent records of the clapper rail from the Ballona Wetlands, Los Angeles County, California. *Western Birds* 42:111-114.

----- 2008. The use of historical data in the restoration of the avifauna of the Ballona Wetlands, Los Angeles County, California. *Natural Areas Journal* 28:83-90.

----- 2006. Annotated checklist of extirpated, reestablished, and newly-colonized avian taxa of the Ballona Valley, Los Angeles County, California. *Bull. So. Calif. Acad. Sci.* 105:91-112.

I have spent well over 100 hours on the reserve, and am familiar with the impact of iceplant on the local flora and fauna. While iceplant provides some habitat for a subset of wetland and dune scrub taxa, it in no way constitutes an important vegetation type, and has successfully displaced large areas of the native community on the reserve. I am confident that both The Bay Foundation and CDFW will conduct the restoration in a sensitive way that maximizes survival of the resulting natural community that develops there.

Sincerely,

Daniel S. Cooper

Cc: Karina Johnston, The Bay Foundation; Richard Brody, Calif. Dept. of Fish and Wildlife

COASTAL COMMISSION

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PAGE 9 OF 18



E Read and Associates, Inc.

211 Culver Blvd., Suite N, Playa del Rey, CA 90293

Phone: 714.366.8857; Email: marshmistress@msn.com

December 9, 2015

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Subject: TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission:

As manager of the adjacent Freshwater Wetlands, and biologist who has been involved in surveys of the Ballona Wetlands since 1990, I strongly support The Bay Foundation (TBF) and the California Department of Fish and Wildlife's (CDFW) invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). While parts of the Reserve still function as native habitat, much larger areas are dominated by non-native invasive plant species, especially iceplant. This has further reduced what limited ecological functions remain after a more than a century of human impacts.

The proposed project will focus on removal of iceplant from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during future restoration. I concur with the assessment of TBF/CDFW that the weed invasion problem requires intervention in these areas. My paper on "The Flora of the Ballona Wetlands and Environs", currently in press to be published in the Bulletin of the Southern California Academy of Sciences, documents a decades-old history of weed invasion that began in the 1800s and accelerated as the watershed became urbanized. Out of all the plants collected or reported for the area, about 40 percent consists of species not native to California. This is a substantially higher percentage than for the California flora as a whole (17%). Iceplant appeared relatively late in the history of the wetlands (1980), yet it now forms a monoculture across large areas.

This project is a step toward restoring the Ballona Wetlands that is much overdue. It also gets the public involved with restoration in a way that is fully compatible with larger scale plans for the wetlands.

Sincerely,

President, E Read and Associates Inc.

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation

Richard Brody, Land Manager, California Department of Fish and Wildlife

COASTAL COMMISSION

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California Coastal Commission
South Coast Area Office
200 OceanGate, Suite 1000
Long Beach, CA 90802-4302

14 December 2015

Subject: Support Letter for TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

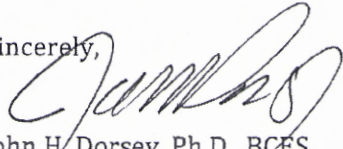
Dear California Coastal Commission:

The Loyola Marymount University Center for Urban Resilience (CURES) enthusiastically supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). This project will focus on the removal of iceplant (*Carpobrotus spp.*) from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Our students have been involved in working with TBF's scientists to assess plant diversity throughout the wetlands, and are eager to help remove this invasive species and reestablish a native plant community. We feel that this project is critical for several reasons:

1. Baseline studies indicate that invasive species are becoming more abundant in the Reserve, so efforts are needed now to begin controlling these plants.
2. The restoration planning and projected work have been taking much longer than expected. Doing this project now will show the public that positive actions are being take to restore lost diversity in the Reserve.
3. This project will include the public, so important restoration and wetland knowledge will be passed on to volunteers and other visitors, thus increasing the public's sense of stewardship for the Reserve.

Given the merits and wide support for this project, we strongly recommend that it be approved by your Commission.

Sincerely,


John H. Dorsey, Ph.D., BCES
Professor, CURES Senior Fellow


Michele Romolini, Ph.D.
CURES Director of Research

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

COASTAL COMMISSION

EXHIBIT # 5
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Environment Now®

December 10, 2015

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

**Subject: Support Letter for TBF / CDFW Invasive Plant Removal Project
at Ballona Wetlands Ecological Reserve**

Dear California Coastal Commission:

Environment Now is a private nonprofit foundation created in 1989 to support environmental protection and restoration in California. We enthusiastically support The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). The Reserve is an important open space in densely-population coastal Los Angeles, and desperately in need of ecological restoration. The invasive plant removal will protect the remaining native flora and fauna on the Reserve.

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

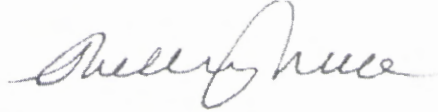
TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

COASTAL COMMISSION

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We urge you to approve this project and support ecological restoration in Los Angeles and at Ballona Wetlands Ecological Reserve.

Sincerely,



Shelley Luce, D. Env.
Executive Director

cc: Karina Johnston, Director of Watershed Programs, The Bay
Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

COASTAL COMMISSION

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California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

7 December 2015

Subject: Support Letter for TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission:

Climate Resolve enthusiastically supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). A small portion of the Reserve is still functioning somewhat as a wetland, yet much of this area is currently covered in invasive plant species, effectively reducing what limited ecological functions remain after more than a century of sediment dumping, development, ranching, farming, and mineral extraction. The ecological impacts of invasive weeds include competition with native species, alteration of food webs, preemption of resources, and alteration of soil chemistry.

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Parfrey".

Jonathan Parfrey, Executive Director

COASTAL COMMISSION

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California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

7 December 2015

800 Wilshire Blvd, 16th Floor
Los Angeles, CA 90017
(213) 689-9707
usgbc-la.org

Subject: Support Letter for TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

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Howard Building Corporation

Ruby Rose Sanchez
Partner Energy

EXECUTIVE DIRECTOR
Dominique Hargreaves

Dear California Coastal Commission:

U.S. Green Building Council, Los Angeles Chapter enthusiastically supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). A small portion of the Reserve is still functioning somewhat as a wetland, yet much of this area is currently covered in invasive plant species, effectively reducing what limited ecological functions remain after more than a century of sediment dumping, development, ranching, farming, and mineral extraction. The ecological impacts of invasive weeds include competition with native species, alteration of food webs, preemption of resources, and alteration of soil chemistry.

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

Sincerely,

COASTAL COMMISSION

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LOS ANGELES

800 Wilshire Blvd, 16th Floor
Los Angeles, CA 90017
(213) 689-9707
usgbc-la.org

Dominique Hargreaves, Executive Director

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

COASTAL COMMISSION

EXHIBIT # 5
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8 December 2015

California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

Subject: Support Letter for TBF / CDFW Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission:

It is with great enthusiasm that my landscape architecture and urban design firm, Mia Lehrer + Associates (MLA), supports The Bay Foundation (TBF) and the California Department of Fish and Wildlife (CDFW)'s invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). The majority of the Reserve is riddled with invasive and non-native plant species, which are negatively impacting the health of the already degraded natural community. Invasive plant species outcompete native species and alter natural resources and processes, such as soil chemistry and food webs. It is imperative that these invasive species be addressed and properly controlled in order to curb further damage and improve the ecological health of the Reserve.

This important interim stewardship project is an essential step towards restoring the Reserve, and connecting the local community to it, via stewardship efforts. TBF and CDFW will be partnering with members of the community and with other environmental non-profit groups like the Friends of Ballona Wetlands and Loyola Marymount University's Center for Urban Resilience.

The project will specifically focus on the removal of *Carpobrotus spp.*, commonly known as iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g. re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping plant that outcompetes native vegetation and quickly takes over an area, creating vast swaths of just this one species. This monoculture results in a reduction in overall biodiversity of both plants and animals. The removal of iceplant, and subsequent introduction of native wetland vegetation, will not only increase the health and stability of the Reserve's wetland habitats, but also provide essential opportunities for local communities to connect with nature through ecological restoration and stewardship activities.

Sincerely,



Mia Lehrer
President, FASLA
Mia Lehrer + Associates

Cc: Karina Johnston, Director of Watershed Programs, The Bay Foundation
Richard Brody, Land Manager, California Department of Fish and Wildlife

COASTAL COMMISSION

Mia Lehrer + Associates is a Los
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California Coastal Commission
South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302

3 December 2015

Subject: Support Letter for Invasive Plant Removal Project at Ballona Wetlands Ecological Reserve

Dear California Coastal Commission:

The Bay Foundation is an enthusiastic partner to the California Department of Fish and Wildlife (CDFW) on the invasive plant removal project at the Ballona Wetlands Ecological Reserve (Reserve). A small portion of Reserve is still functioning somewhat as a wetland, yet much of this area is currently covered in invasive plant species, effectively reducing what limited ecological functions remain after a more than a century of sediment dumping, development, ranching, farming, and mineral extraction. The ecological impacts of invasive weeds include competition with native species, alteration of food webs, preemption of resources, and alteration of soil chemistry.

The project will focus on the removal of *Carpobrotus spp.*, or iceplant, from a targeted area within the Reserve that will not undergo significant changes (e.g., re-grading) during construction or restoration. Removing iceplant and other non-native vegetation on site will help protect the remaining native flora that will be critical to the revegetation of the Reserve for the larger multi-year restoration effort. Iceplant is a creeping, mat-forming group of species that form dense monocultures, causing a reduction in biodiversity and competing directly with native wetland species. Its removal, and subsequent introduction of native wetland species will provide an increase in the health and condition of the wetland habitats in the Reserve, and will allow for community engagement in restoration efforts.

CDFW and The Bay Foundation will be partnering with members of the community and with other environmental non-profit groups. This project is funded by the Wetland Recovery Project's Community Restoration Grant Program, volunteer efforts, and matching funding from The Bay Foundation. This important interim stewardship project is an essential step towards getting the public involved with the Reserve and restoration efforts.

Please consider approving and moving forward with the Coastal Development Permit. Thank you.

Sincerely,

Tom Ford, Executive Director
The Bay Foundation

COASTAL COMMISSION

OUR MISSION:
*To restore and enhance the Santa Monica Bay
through actions and partnerships that improve water quality,
conserve and rehabilitate natural resources, and protect the bay's benefits and values.*

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