

# California Native Plant Society

May 25, 2016

Mr. Kenneth Wong  
(Transmitted by email)

Re: Sepulveda Dam Basin Vegetation Management Plan –DSEA

Dear Kenneth:

The California Native Plant Society has been active in the Sepulveda Basin Wildlife Areas Steering Committee since its inception in 1990. The California Native Plant Society is a state-wide organization dedicated to the preservation, conservation and enjoyment of California native plants and their habitats. Los Angeles / Santa Monica Mountains Chapter is one of 35 regional chapters located around California.

**CNPS recommends Alternative 4**, the South Marsh Alternative. Currently, in the Basin there is no other seasonal marsh or the occurrence of *Juncus acutus*. This alternative would benefit the Basin the most in that it would add two new features.

**CNPS is against Alternative 5**, as the berms would be weed magnets and attract bicycle riders (as happened to the hills in the Bull Creek Ecosystem Restoration Area once the fences were removed.)

**CNPS is against Alternative 1**, as annual mowing will eliminate any chance for the *Baccharis* shrubs to flower.

**Between Alternatives 2 and 3, CNPS prefers the Phased Mowing (Alternative 3).**

**Section 1.2 (Background)** has much incorrect information and mischaracterizations of events. The first paragraph is an attempt to rewrite history, minimizing the amount of native vegetation present and focusing on non-native plants including one never previously seen in the Basin. Poison oak (*Toxicodendron diversilobum*) has never been identified in the Basin – at least in the 40 years that I've been exploring.

A better characterization (first sentence, 1.2) would be: "Prior to December 2012, the Proposed Action Area had been generally heavily vegetated with mature stands of *Baccharis pilularis* (coyote bush) and *Baccharis salicifolia* (mule fat) along with stands of various aged native riparian trees (Fremont cottonwood, *Populus fremontii*; valley oak, *Quercus lobata*; sycamore, *Platanus racemosa*; box elder, *Acer negundo*; elderberry, *Sambucus mexicana*; and native ash, *Fraxinus* sp.) present around the pothole pond and along the revegetated right-of-way (part of a previous mitigation). The non-native tree evergreen ash (*Fraxinus uhdei*) was present throughout and dominant along Haskell Creek. Non-native eucalyptus trees were present and in some areas already expanding into eucalyptus forests. Mustards (*Brassica* spp. and *Hirschfeldia* sp.), horehound (*Marrubium vulgare*), spiny cocklebur (*Xanthium* sp.), yellow star thistle (*Centaurea solstitialis*), perennial pepperweed (*Lepidium latifolium*), and various non-native perennial grasses including giant reed (*Arundo donax*) were present in the areas not covered by



Dedicated to the preservation of California native flora



*Baccharis* sp. Along Haskell Creek, a variety of non-native trees such as Brazilian pepper, black locust and *Ailanthus* were present. Native shrubs included golden currant (*Ribes aureum*), holly-leaf cherry (*Prunus ilicifolia*), and blackberry (*Rubus* sp.) were common. Native plants from the coastal sage scrub plant community covered the Burbank Blvd. berm.”

In the next paragraph leads off with “Unchecked growth of nonnative invasive plants in the interior of the Proposed Action Area provided dense cover...” That is an incorrect statement. The dense growth were native plants in the genus *Baccharis*. There is plenty of photo-documentation showing that this area was one of the least fragmented *Baccharis* habitats anywhere in the San Fernando Valley prior to December 2012. Not to minimize anyone’s death, but attributing this death to the vertical height of vegetation is mistaken. If the vegetation impeded emergency vehicles, it was because no agency ever took responsibility for maintaining the existing roads in the area, despite the Wildlife Areas Steering Committee urging managing agencies to do so.

Regarding the general concern with unauthorized activities, it seems a slippery slope to start equating danger with shrubbery, as there are many other places with shrubbery where unauthorized activities take place – probably at a much higher rate than in the Proposed Action Area.

In the third paragraph of Section 1.2, the first sentence would also be true if written as follows:

“Per requests from the city of Los Angeles including the Los Angeles Police Department, the Corps developed a vegetation management plan for the area in 2012 but neglected to notify stakeholders such as the Sepulveda Basin Wildlife Areas Steering Committee or any other environmental group.”

**Section 3.6 Biological Resources also includes mischaracterizations.** The second sentence in the first paragraph (Affected Environment – Vegetation) states: “Native vegetation Zones within the Basin are fragmented, degraded, and small in size (Corps 2012b).” The document referenced is “Sepulveda Dam and Basin ONEgeneration Child Care Expansion Environmental Assessment. November,” a document that was never reviewed by the CNPS or the Sepulveda Basin Wildlife Areas Steering Committee. Rather, the area where the Corps “removed native and non-native vegetation” was the best (least fragmented) stand of *Baccharis* in the San Fernando Valley, and not degraded until the Corps performed its plant removal project.

In the second paragraph, the authors cite a plant list for the *Baccharis pilularis* vegetation type that doesn’t reflect the on the ground conditions in the Sepulveda Basin, a recent succession natural plant community co-mingled with many planted species as part of revegetation projects. Please remove madrone (*Arbutus menzeisii*) from the list as that species has not and does not occur here.

In the last paragraph, once again you list poison oak (*Toxicodendron diversilobum*) as occurring in the Basin, and it doesn’t, and also, it IS a native species.

### **Additional Comments**

The management proposed for coyote bush is to mow or cut to 3’ with a rotation cycle of 4 years. While that might seem reasonable, there is no data as to how fast coyote bush will grow back or what the effect of cutting will have on the species. CNPS recommends that this prescription be available for modification and that a biologist be tasked to assess the effects of mowing at a regular interval (such as

4 years) and that the biologist's recommendations be accepted to modify the height or frequency of mowing / cutting if the effect is deleterious.

On page 11, Tree Maintenance (Native Trees), it states: "Large...native trees...would be pruned to a height of 8 feet..." This reads and could be interpreted that the trees should be limited to a height of 8 feet. Perhaps the language should be more specific and say "...branches below eight feet should be trimmed in order to ..."

Various herbicide prescriptions are included in the different alternatives, ranging from as needed, to four times per year, to either 2 or 4 times per year depending on zone and years after revegetation. It would be more effective to treat weeds in an ad hoc manner, rather than on a strict schedule, because each year is different depending on timing and amount of rainfall and whether the basin floods. There also needs to be special attention to the most aggressive and problematic weeds, in particular perennial pepperweed, yellow star thistle, and giant reed; these three species need to be targeted for eradication.

Regarding Tree removal (Alternatives 4 and 5), per Kenneth Wong, the second listing (Tree Removal) has been deleted; the first listing (Tree removal – non-native trees) remains.

CNPS appreciates that funds are limited, but the overgrown canopy of evergreen ashes that have turned Haskell Creek into a degraded, shaded, low-quality habitat should have a high priority for removal, regardless of which Alternative is selected. The current condition is a result of the Corp's lack of concern about the evergreen ash problem despite being notified about this over and over again for many years (if not decades). Furthermore, the amount of space taken up by the forest of non-native ash trees reduces the capacity of the dam and creates the conditions (hiding places, etc.) that the Corps wishes to modify. While evergreen ash trees may provide perching spots for raptors, this is only the case because the evergreen ash trees have grown taller than the natives and many of the native trees in the project area were cut down during 2012.

Kenneth Wong also communicated (by email) that the non-native invasive water hyacinth has been removed from the list of marsh plants included in Alternative 5 (page 25).

Thank you very much for your consideration of our comments.

Sincerely,



Steven Hartman

President, Board of Directors  
California Native Plant Society