

California Native Plant Society

September 12, 2005

Ms. Ruth B. Villalobos
Chief, Planning Division
U.S. Army Corps of Engineers
Attn: Dr. Nedenia C. Kennedy
P.O. Box 532711
Los Angeles, CA 90053-2325

Dear Ms. Villalobos and Drs. Kennedy and Watt:

Thank you for the opportunity to comment for the California Native Plant Society (CNPS) on The Draft Detailed Project Report and Environmental Assessment/Mitigated Negative Declaration (DPR/EA/MND) for the Bull Creek Ecosystem Restoration Project.

California Native Plant Society (CNPS) is a non-profit statewide organization with over 9700 members. The Los Angeles/Santa Monica Mountains Chapter has about 500 members and is one of three CNPS Chapters in Los Angeles County. CNPS is dedicated to the preservation of California's native flora through science, education and advocacy.

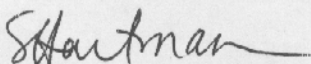
We strongly support this project and agree that Alternative 4, the Oxbow Concept, should be the Recommended Plan. Below are some additional comments:

Page 7.1 (Section 7.2.1 Grading Plan). This project will result in excess fill that will mostly likely disposed of at a local landfill. There are areas in the Sepulveda Basin that, due to erosion and flooding, are lacking soil; these potential danger zones are along Burbank Blvd near the intersection with Woodley Avenue where steep drop-offs (greater than one foot) could cause damage to vehicles if they inadvertently drive off of the road. It is suggested that excess fill could be used to re-fill local areas within the Sepulveda Dam Basin where this condition occurs.

Page 7.5 (Section 7.4 Biological Features). We noticed that you are suggesting planting white alder (*Alnus rhombifolia*) in the riparian woodland community. White alder was originally planted as part of the 1986 Wildlife Area vegetation and none of the trees survived. While we would like to see white alder added to the plant palette of the Sepulveda Basin, be advised that it hasn't survived in a previous attempt and that a possible substitute would be the native flowering ash (*Fraxinus velutina*) that has survived in the Wildlife Area.

Page 7-19 through 7-21 (Habitat Monitoring). The monitoring program, while describing a schedule, does not define sampling protocols (e.g. vegetation quadrats) that could be used to specifically assess if the project is successful by statistically comparing the change from ruderal non-native (mostly) vegetation to the target vegetation. The CNPS has published various sampling protocols (in particular the relevé) that could be utilized to gather data as opposed to visual "site assessment visits."

Sincerely,



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Dedicated to the preservation of California native flora

