

# California Native Plant Society

May 13, 2002

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City of Los Angeles  
Bureau of Sanitation, Wastewater Engineering Services Division  
433 So. Spring Street, Suite 500  
Los Angeles, CA 90013

Re: Sepulveda Wetlands Park – Draft Concept Design Report

Dear Adel:

After much consideration, the Los Angeles / Santa Monica Chapter of the California Native Plant Society voted to support the development of a constructed wetlands at the site known as Area 7 (west of the Los Angeles River and south of Burbank Blvd.) at their May 7 meeting. We appreciate the efforts that the Bureau has made to meet with our group and respond to our concerns.

Please consider the following comments regarding the Draft Concept Design Report:

## This is NOT restoration

Table ES-1 and ES-3 (Section 3.1 and elsewhere). The use of the word “restoration” to describe the proposed constructed wetlands is not accurate for two reasons.

- 1) Restoration in a literal sense means to fix something that is broken. For example, if the door needed painting and I painted the frame instead, I couldn't say I restored the door. Thus, if you create wetlands adjacent to a watercourse, with conditions that are completely unnatural for the area, it would be incorrect to state that the local wetlands are being restored.
- 2) The title of the section “Restoration of Native Wetland Habitats” is disingenuous. If you want to restore something you must attempt to do it fully, not partially. Your basis for restoration includes water, plants, fish and birds, but not much else. The 1-acre “natural” treatment cells will be lined with polyethylene! Non-native mosquito fish will be introduced in the water so that the insects will be controlled. Will there be native rodents introduced to the berms? What about amphibians? Will you control the non-native bullfrog? In terms of the vegetation, you mention perennial plants, but no annual plants. How can you claim you are restoring a habitat and not include any annual plants? Thus, rather than saying “restoration of native wetland habitats,” you could say “creation of wetlands with native plants.”



*Dedicated to the preservation of California native flora*



You go on to state:

To restore wetlands within the greater Los Angeles Basin, four broad categories of plant communities are proposed that recreate some of the gradient of upland and wetland habitats consistent with historical native habitat conditions.

What do you mean "consistent with historical native habitat conditions?" As far as we know, there are no historical records of the vegetation of the San Fernando Valley or the Los Angeles River in the San Fernando Valley (nor did you cite any). Indeed, the very fact of the dam makes recreating a historic condition impossible unless you first remove the dam. Perhaps a more accurate sentence would read:

To create new wetlands within the greater Los Angeles Basin, four broad categories of plant communities are proposed that attempt to represent a gradient of upland and wetland habitats consistent with plant communities found elsewhere in Los Angeles Co.

In the following paragraph (Beneficial Reuse...) you start the first sentence by stating "Restoration of native wetland habitats will create opportunities to provide natural treatment..." We recommend you rephrase as follows: "Creation of wetlands will create opportunities..."

Thus, going back to table ES-1, rather than stating a benefit as "Provide restoration of native wetland habitats," CNPS believes you should more accurately state "Provide wetland bird and fish habitats planted with native plants."

#### Dominant Plant Community

In ES-6, Graphic Plate 10 - Typical Riparian Buffer Strip, Section 3.4 and elsewhere, cottonwoods and willows are specified for planting. Willows such as *Salix laevigata* and *S. lasiolepis* are common in wet places in the Santa Monica Mountains and in riparian woodlands, and thus *S. laevigata* should be added to your list. *Salix lasiandra* var. *lasiandra* is known from the Los Angeles River, and should be included in your list.

While cottonwoods are known to do well in the basin along Haskell Creek, CNPS has observed that the apparent "natural" community is a mule fat - coyote bush alliance. These plants volunteer without urging; the area recently added to the Wildlife Reserve west of Haskell Creek and north of Burbank Blvd. has many mule fat and coyote bush plants growing where none were planted. Please note that the coyote bush is represented by two species, *Baccharis emoryi* (in your plant palette) and *B. pilularis* (should be added).

Therefore, rather than cottonwoods and willows in the riparian buffer strip, we suggest a combination of mule fat, coyote bush, and willows. There are plenty of trees in the immediate vicinity, as the project is flanked to the north by Encino Creek, with a combination of native willows and non-native Shamel ash, eucalyptus and other ornamental escapes.



Furthermore, as was noted in the section on special status species, Least Bell's vireo prefers a habitat of willows or coyote bush, not cottonwoods. It would be valuable to expand the mule fat - coyote bush habitat on the east side of the Los Angeles River to the west side as well.

There are two other reasons why cottonwood trees might not be the best choice for the area. First, one of the alleged advantages of the constructed wetlands for bird watchers would be the various water levels that attract shorebirds, mostly missing from the wildlife lake. However, if large trees were to line the constructed wetlands, the shorebirds might not feel comfortable landing. The relatively low height and stature of the mule fat and coyote bush would not create that scenario.

Second, mature cottonwood trees would shed a tremendous amount of leaves each year, and females will shed huge amounts of fluff when flowering. It seems that this might cause a problem in managing the debris filling in the wetlands (10.0, p. 30. "Inflow and outflow orifices need to be periodically checked to ensure that they are free of clogging plant or other material...")

### **Boardwalk**

On page ES-7 the report states: "Where possible, boardwalks and/or trails should utilize recycled materials..." One of the joys of a wetland habitat is its fresh, "green" odor. Unfortunately, recycled plastic boardwalks (such as the ones installed at Big Morongo Preserve in Morongo Valley, Riverside Co.) give off a distinctive plastic - oily smell that permeates the air on warm days. We highly recommend you try something that isn't plastic-based to avoid unanticipated odors.

### **Education Program**

(ES-7 through ES-9) To build a facility that hasn't been requested, and then not provide funding for staff in the budget, doesn't sound like a benefit. The proposed budget has not provision for funding this "benefit." Currently the Audubon Society and others are hard pressed to fund the ongoing education programs at the Wildlife Lake. It is unrealistic to assume volunteer groups will be able to support another education venue in the basin.

There are already enough buildings in the Sepulveda Basin. Every square foot covered in concrete is completely the antithesis of what a flood control basin is all about. Thus CNPS encourages the designers to not pave the proposed parking lot and minimize structures.

## Key Project Issues To Be Addressed

### **Special Permanent Weed Budget Needed**

(ES-9) In the list of management activities, there needs to be provisions for ongoing weed eradication. In our experience from implementing numerous native vegetation planting projects in the basin, we have determined that if the weeds can be managed effectively for 5 full years after the initial plantings, weeds will be manageable in the ensuing years. Thus there should be a special budget for weed control, and of that total budget, we recommend allocating 60% for the first 2 years, 30% for the third and fourth year, and 10% for the fifth year. The annual budget for weed eradication in the sixth year on should be shared with the other agencies managing land in the Sepulveda Basin, so that a basin-wide approach to weed management would take place.

We already know what happened when *Arundo donax* (giant reed grass) was ignored as it slowly took over the Los Angeles River, and how expensive it was to eradicate. The "south reserve" (south of Burbank Blvd., east of the Los Angeles River) currently does not have a giant reed grass problem, due to ongoing control for the past 5 years funded by the Army Corps of Engineers, the Sepulveda Basin Wildlife Areas Consortium, and the LA / SMM Chapter of the California Native Plant Society. The Bureau of Sanitation, as a significant and experienced manager of native plants in the basin, could take the lead in assuring a coordinated approach to weed management.

The long term approach would also include building the capacity to deal with various scales of weed invasions. Realize that 10 years ago we had very little tocalote (yellow star thistle - *Centaurea melitensis*), but now it is common along trails throughout. We recently discovered passion vine strangling a willow near the Hjelte Field entrance. This year I saw my first *Brassica tourniforti* (Saharan mustard) in the basin, and I know from first hand observation that this plant has taken over large portions of the deserts in southeastern California and western Arizona. Controlling weeds will have to be an ongoing project, part of the project being identifying non-native plants trying to invade. And that is where volunteers will be invaluable.

### **Weed Seed Deposition**

Regarding flood damage effects (ES-10), one effect not mentioned is the deposition of weed seeds. When the basin floods, every weed seed in the upstream watershed ends up in the Sepulveda Basin. Since weeds prosper due to disturbance, and flood deposition is a kind of disturbance, there will always have to be provisions for special episodes of weed removal needs. In addition, there is a huge difference in the amount of weeds during a year when there is regular rainfall from October through April, when compared to a drought year such as the one we are currently experiencing. Weeds can be a significant problem (ask Gene Green regarding the Tillman berm native planting), but are effectively controlled when a solid cover of native shrubs develops.



### **The Problem with Horehound**

While mulc fat can form a solid thicket eliminating most weeds in the understory, one weed that prefers damp, shady places is horehound (*Marrubium vulgare*). This plant currently is widespread in the "south reserve." The seeds of horehound are incredibly sticky, and will attach themselves to clothing and fur, and get dispersed to the north through the tunnel beneath Burbank Blvd. during flooding. Because of this, we have always had to work on controlling horehound in the area north of the tunnel. And because of this infestation, when the basin floods, millions of horehound seeds will end up in the constructed wetlands, and you will have a big-time weed problem. Therefore, it would be a benefit if the horehound in the "south reserve" (and throughout the basin) were to be eradicated, and we request that you add this to your list of project benefits along with appropriate funding.

### **What is with the Levees or Berms?**

Section 10.0 (page 30) refers to "maintenance of the levees (infrequent mowing)". A diagram (Figure 8) shows the berm to be 2' to 3', and, if to scale, about 1' wide. I assume it is not to scale, given the width of the entire cell is 300'-400'. What is the dimension of the berms? Are these berms the same as the levees mentioned in Section 10.0? Will they accommodate what forms of recreation (if any)? What is the planting plan for the levees that need only infrequent mowing?

If the top of the levee (berm) is used as a path, what is the total acreage of paths versus wetlands or riparian buffers. The acreage of non-wetland as a percentage of entire acreage of project should be mitigated 3:1.

### **Urban Runoff Capture**

In Section 3.2 (Contribution to LA River Enhancement), you list Tillman effluent, the LA River, Encino Creek, Haskell Channel, and Caltrans ROW as sources, and then note that "urban runoff sources will be determined at a later date." Could this date be never? One of the key features that convinced us that this project was beneficial was the capture of stormwater. Please assure us that this feature will be incorporated into the project at its inception.

Graphic Plate 2 shows an "urban runoff diversion and pipeline" tapping into the Los Angeles River just west of Bull Creek. Why not tap into the LA River east of the point where Bull Creek enters the LA River so that you can capture the urban runoff from that creek as well? In Appendix E, page 23, section 6.3, you state that "A diversion structure would be constructed in Bull Creek to divert urban runoff into a pretreatment facility for subsequent pumping to the distribution structure of the head end of the wetlands treatment system," but that diversion structure isn't shown on any diagram nor do I find a budget item for it...please explain.

### Mitigation for Disturbance to Existing Habitat

This project will cause disturbance to existing riparian habitat in the "south reserve" (Area 6) where the Tillman outflow pipe will have to be tapped into to both divert water to the constructed wetlands and then also receive the "polished" water. This area was previously revegetated after the Tillman pipeline was extended under the dam. Even if the pumping station ends up underground, there will likely be significant disturbance to the site and right-of-way where the pipes will be buried. Disturbance will lead to weed growth, thus any areas disturbed during this project will need to have 5 years of weed mitigation. The following weeds should be listed for control:

*Ailanthus altissimum*  
*Arundo donax*  
*Centaureum melitensis*  
*Centaureum solstitialis*  
*Cirsium vulgare*  
*Conium maculatum*  
*Eucalyptus spp.*  
*Fraxinus uhdei*  
*Hirschfeldia incana*  
*Lactuca serriola*  
*Leptochloa uninervia*  
*Malva parviflora*  
*Marrubium vulgare*  
*Melilotus albus*  
*Nicotiana glauca*  
*Paspalum dilatatum*  
*Picris echioides*  
*Piptatherum miliaceum*  
*Ricinus communis*  
*Salsola tragus*  
*Silybum marianum*  
*Sonchus oleraceus*  
*Sorghum halapense*  
*Xanthium strumarium*

Besides controlling weeds, mitigation at a 3:1 basis for disturbance in the wildlife area should be implemented. A good place to plant additional trees would be between Haskell Creek and the path on the west side of the Creek, between the two bridges in the north reserve. We suggest female cottonwoods, sycamores and box elders (*Acer negundo*).



**Plant Palette (Table 8-1)**

*Carex nebrascensis* is not a native to the Santa Monica Mountains or the San Fernando Valley (it is associated with mountains).

*Callitriche heterophylla* was not reported found in the Santa Monica Mountains (Raven, Thompson, Prigge. (1986) Flora of the Santa Monica Mountains, California), however it is widely distributed in California. We suggest that you try to introduce *Callitriche marginata*, a rare water-starwort found in the drying mud of vernal pools.

*Rorippa nasturtium-aquaticum* was not reported found in the Santa Monica Mountains, however it is widely distributed worldwide. We suggest that you also try *R. curvisiliqua*, previously known from the Los Angeles River.

Coyote Bush, *B. pilularis*, should be added to your list.

*S. laevigata* (black willow) should be added to your list.

*Salix lasiandra* var. *lasiandra* (sandbar willow) should be added to your list.

There are no grasses listed in your plant palette, but on Figure 11 (Typical Overland Flow Treatment Cell) you show grasses. There are many local native grasses to choose from, and CNPS would recommend that you utilize grasses native to the local mountains or the San Fernando Valley.

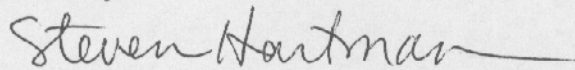
Graphic Plate 12 (Typical Algal Treatment Cell) shows water hyacinth, a non-native invasive species. Please delete that and replace with native plant.

**Last but not least**

Please change the name of this project to one that characterizes the main function of the project, that being water treatment. Also, the area is called the "Sepulveda Basin," not "Sepulveda."

Thank you very much for the opportunity to comment on the proposed project.

Sincerely,



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