California Native Plant Society

May 16, 1995

Debbie Lamb
Dept. of the Army, Corps of Engineers
Los Angeles District
300 North Los Angeles Street
Los Angeles, CA 90053-2325

RE: Sepulveda Basin Wildlife Area Conceptual Master Plan Design Narrative

This document states that "recommendations for recreational and plant community development are part of a process which includes setting goals, and analyzing physical conditions and previous studies of the Wildlife Area". I feel that the goals which have been set have not been agreed to by the Wildlife Areas Steering Committee, that the analysis of physical conditions has not been completed or even significantly taken into account in developing the "Design Narrative," and that it appears that previous studies have been ignored or not made available to EDAW, Inc.

On the positive side, the Corps willingness to include the public in this process will result in a much better result, but only if the need to "move forward" with this project does not outweigh the importance of proper consideration of public comments. Thus, please understand that the following comments are not meant to impede your progress, but that, as a member of the public who has had a deep involvement in the Wildlife Areas, I am concerned about the lack of use of previously known information and reports. Also, your narrative states that a consensus was reached regarding the general direction of the Conceptual Management Plan prepared by the Chambers Group in March 1994. **This is not true.** The Chambers Group report did not evaluate the importance of Haskell Creek as a potential riparian corridor. The detailed plant list was not complete; attached is a plant list with references cited.

GOALS

The goals developed to guide the planning of the Wildlife Area were never reviewed or approved by the Sepulveda Basin Wildlife Areas Steering Committee. There is no mention of the goal of providing wildlife habitat for endangered species. There is a mention that the Conceptual management plan suggested planting a California walnut grove ("a habitat becoming rare in southern California) within the riparian zone. According to Holstein* (1978): "*Juglans californica* is a mostly non-riparian tree of southern California...It is restricted to deep, friable Tertiary marine shales with high water-holding capacity which permit it to survive as a local dominant on upland sites.." It is true that the walnut has shown up as a volunteer in a few sites in the north reserve; these sites should be evaluated for soil and water table so that additional planting will take these factors into consideration.

The goal of maintaining the species focus on waterfowl is an ambiguous goal; waterfowl is a term used to describe ducks, geese, and swans. The Canada goose, perhaps our most important waterfowl, is worth planning for; however, there are other significant species (breeding blue grosbeaks) that require completely different habitat than that required by the

* Holstein, Glen. 1978. California Riparian Forests: Deciduous Islands in an Evergreen Sea. California Riparian Systems (copy of article in compilation prepared for Wildlife Areas Steering Committee, March 1993).

Canada goose. In fact, what congregations of geese require is probably the most important consideration when designing the reserve: if the planning is not right, the geese will not use the reserve.

VEGETATION

The vegetation description provided in the report is incomplete and inaccurate. There is no discussion of the succession of vegetation; there is no report of the previous revegetation efforts, their results in terms of which species have been successful (see copy of summary attached); there is no reference to the report *"Revegetation in the Sepulveda Wildlife Reserve: A Seven Year Summary."* Your plant list for the south reserve is inaccurate and incomplete. The least prominent trees are bay laurel and planted ash; the prominent trees are box elder, cottonwoods, and willows. Your use of the name "broom" is a wonder. See enclosed plant list for more detailed information.

There is no discussion of the role soil disturbance has on the succession of various weed species and the fact that an on-going program of weed eradication in the north reserve (by volunteers and paid staff) has resulted in the complete eradication of the following weed species: castor bean, giant reed grass, tobacco plant, milk thistle, and most of the horehound. The one plant that defies eradication is fennel. Weeds can be a serious problem; the need not to disturb large areas must be incorporated into the planning.

It is important to contrast the south reserve where weeding wasn't done continuously during its development; it is now very infested with horehound and giant reed grass. Be aware also that the south reserve is much more difficult to access: during the past few years, this area remains wet and mucky and impassable for weeks after flooding, in the spring, when it is the best time to undertake weeding. Unfortunately, the Design Narrative does not address what to do with the weed problem in the south reserve. The north reserve, now relatively undisturbed for nearly a decade, demonstrates that with focused effort on an ongoing basis most of the invasive weeds can be controlled. In fact, once the natives begin to drop leaves and create a "mulch" and once their canopies shade most of the sun from under them, all weed problems go away. We need a plan for the south reserve!

Speaking of disturbed, your maps should also reflect the scar area in the center of the Wildlife Lake on the east shore; this area is the most recently disturbed piece of land in the wildlife reserve. Two years after installing the lake and vegetation, bulldozers entered the north reserve diagonally across the east fields (you can still barely see the scars) and scraped dirt from the east side of the lake into the lake to fill a low spot. This area has an unnatural topography. There should be consideration to fix this ugly scar.

PLANT COMMUNITIES

There is absolutely nothing mentioned about the various plant communities which are present in the reserve; these communities were defined by the Army Corp of Engineers and then planted out. These areas should be mapped and worked around, using them as a base. The Design Narrative proposed two plant communities: grassland and alluvial sage scrub, neither of which provides any clue as to what you might mean. None of the references which I use to describe plant communities list "alluvial sage scrub." Therefore it is impossible to know what you mean. The use of the term grassland is generic, and if the purpose of the reserve is to provide habitat

habitat for wildlife, one would think that the planners would make this the first priority for research and understanding, and propose plant community suggestions that are meaningful. Additional further analysis items not mentioned in the Narrative include an analysis of mycorrhizal fungi in the soil and the needs to inoculate native material.

TIME UNTIL MATURITY: Grasslands

The estimated construction schedule describes various time periods for areas to "mature", none of which seem realistic. The narrative states that "with vigilant weed control" the grasslands could mature within three to five years. If this is native grassland (which should be the goal) there is no scientific basis (that I am aware of) for this claim. There are few if any examples of native grassland regevetation in previous agricultural fields with no existing root or seed stock of indigenous native bunchgrasses.

Regarding the need for irrigating the grasslands, please note that the "grassland" on the upper portion of the north reserve between the lake and the dam wall has become a non-native grassland with no intervention except for mowing and hand removal of weed species. The goal of creating a native bunchgrass grassland is noble; the time frame, the cost, certain possible requirements such as controlled burning, require a major planning effort and much research.

I suggest that the development of a native bunchgrass grassland could be incorporated into the "learning experience" gained by the elementary school students who visit the Wildlife Area in conjunction with the ongoing educational program. If each student were to experience planting out a native bunchgrass seedling or previously propagated "bunch," they could actively participate in the restoration of a native grassland, and thus get a first hand experience related to what this area is all about: that is, creating natural habitat. The consideration of this proposal, which the California Native Plant Society supports and will help fund over the long-run, should be incorporated into the plan: where can propagation take place? where should stands of native grass be planted out in a way that will fit in to the current educational activities which take place? what management activities will be required to ensure the success of the native bunchgrass revegetation?

(Also, in the grassland section, what do you mean by windflowers? Assuming this should read wildflowers, it seems that reseeding is contrary to the goal of "sustainable design.")

TIME UNTIL MATURITY: Riparian Areas

We know by experience that the south reserve riparian areas around the pothole pond, which were planted out in 1979, are not yet mature: as far as I have observed, the cottonwoods are not producing seeds. We know that the willows along Haskell Creek were also planted in 1979, and have formed a mature community and overstory (this took about 10 years). The mesic scrub habitats originally designed to surround the wildlife lake (do you have a copy of the original planting plans?) did not succeed after installation: all of the 2,000 willow cuttings died (see analysis of survival attached). Only the mule fat, which in addition to being planted (but with only a small percentage success from cuttings), invaded by virtue of a population along Haskell Creek has provided any mesic scrub, and can become a thicket in five years. Note that the core of vegetation which existed in the reserve before 1979 includes the tall willow in Haskell channel (where the blue grosbeak resides) along with mule fat in the same location, as well as at the southeast corner of the north reserve.

ODDS AND ENDS

One last problem that this plan should address is the fact that 4.5 acres of vegetation was recently planted at the north end of the lake in the north reserve (this area of upland vegetation is not noted on your plan). The reason why plants were requested to be planted there was to screen the cricket field from the reserve, and provide a barrier so that people walking their dogs in the park would not enter the reserve from that side (remember, this was before the City and Corps offered to expand the wildlife areas to the north). The original request was for trees to be planted along Haskell Creek (to continue the cottonwood corridor as started north of the entrance to the reserve) and that shrubs be planted at the north end of the lake. Unfortunately, the trees weren't planted along the creek; instead, they were planted in what appears to be smack dab in the middle of the view from the area proposed (after our soggy Sunday morning tour) for the "view." What to do? Lastly, the concept of screening the views of the high-rise office buildings is not needed; the fact that this wildlife area is in the middle of an urban area shouldn't be hidden; it shows that wildlife in an urban environment is possible.

Thank you very much for your consideration of these comments.

Sincerely,

Steven Hartman

Steven Hartman
Director-At-Large
California Native Plant Society

P.S. Your use of letters to describe the different areas of the Wildlife Area are obscure (not using local names for areas is the first way to alienate the consulting firm from the public!) Could you not have specified:

(a) north reserve (wildlife lake area)
(b) south reserve (pothole pond etc.)
(c) middle reserve (between Haskell Creek and Woodley)
(d) west reserve (between Woodley and L.A. River)

P.P.S. Enclosed is a copy of the table of contents of a compilation of articles I prepared for the Sepulveda Basin Wildlife Consortium in March 1993; I believe the City has a copy of the full document on file but if you would like a copy I could arrange to have one photostated.

PAPERS ON RIPARIAN RESTORATION & REVEG. PROJECTS RELEVANT TO THE SEPULVEDA DAM BASIN

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