

For the Sepulveda Basin Wildlife Areas Steering Committee (SBWASC)  
December 12, 2012

Dear Ms. Lamb and Mr. Bass:

Regarding the Army Corps of Engineers' Sepulveda Dam Basin Vegetative Management for the South Wildlife Reserve Draft Finding of No Significant Impact of August 2012

Unfortunately no members of the Sepulveda Basin Wildlife Areas Steering Committee were noticed about this document and would have remained in the dark about the plans except that one member found it on the internet by accident on December 6th. In the hope that we can make a positive contribution to the project, we submit these brief comments.

1. Goals: The Sepulveda Basin Wildlife Areas Steering Committee agrees that stated purposes of the project are worthwhile and should generate significant biological benefits to the habitat in the long term. We are pleased that the Corps will provide some active management with an emphasis on native vegetation. However we have grave concerns about its implementation. These concerns are based in part on misstatements and apparent oversights in the document.

2. Shrubs: Although some of the native trees will be marked and saved, it is not clear that the same effort will be made to identify/spare mature native shrubs. There is not even acknowledgement of the presence of many mature native shrubs, such as mulefat and coyote brush in the document. There is no doubt that preserving all mature native plants would be better than removing them and then planting new ones. Mature plants not only reproduce and multiply at no cost to the Corps, but they shade out and kill the non-natives that they would otherwise be spraying poison on for the next few years. The use of the term mowing indicates that "non-native plant" removal will be quite indiscriminate. Clearing brush by hand is strongly preferred over large scale mechanized removal. The "biologist on site" should provide training for the staff performing those duties and then closely monitor them.

3. Dead and Broken Limbs: Dead and broken limbs provide great habitat for several species of native birds and insects and should be left in place except where they overhang recreational trails or roads.

4. South-facing Berm Along Burbank Boulevard: The entire slope from Burbank Boulevard, across the bike path, and to the maintenance road, is a fabulous example of the good work that the Corps has done in the past and should be preserved intact except for some selective hand weeding of non-natives. Planting additional native plants of the coastal sage scrub community where the original vegetation has recently burned is a good idea.

5. Trees Along Haskell Creek: Trimming mature native trees up to 20 feet from the ground will produce a very unnatural park-like appearance and is unnecessary at best. It will do very little to enhance security or reduce fire risk and will have a slight negative impact on wildlife utilization. And what about native trees that are less than 20 feet, or 20 to 25 feet tall? If some clearance must be done; the specification should be "up to 20 feet from the ground or 1/3 of the total tree height whichever is less".

6. Species of Native Trees: There are not only the valley oaks and western sycamore trees mentioned in the document but also many coast live oaks, box elders, two species of cottonwoods, and large willows that are native.

7. Offer to Assist: The members of the SBWASC would like to offer their expertise in identifying native trees and shrubs and are willing to volunteer their time to make sure all the native vegetation is flagged. Furthermore, based on their experience in weed control in the north reserve, SBWASC members can also provide suggestions on how to eliminate non-native annual weeds and keep all the native shrubs.

The Sepulveda Basin Wildlife Areas Steering Committee