

Project D.E.L.T.A.  
Project Numbers: R2011-00090, RCUP201100007, RENV 2011-00012, RLLA 2011-00001,  
RCOC2011-00012,  
RCOC2011-00013  
SEA Name: Santa Clara River  
SEATAC Meeting Date: (previous) 5 March 2012  
Planner: Iris Chi  
Biologist: Shirley Imsand

## **BCA/Biota Report Notes and Recommendations**

The planner and the biologist should use this section to explain why any items might be missing, why the BCA/Biota Report may be deemed complete despite these data gaps, and any recommendations or notes.

**Planner Notes and Recommendations:** Since there has been no communication with the applicant, D.E.L.T.A., and no new information submitted since the previous SEATAC meeting date on March 5, 2012, Staff is recommending approval of the project with SEATAC's recommendations to be incorporated into the Conditions of Approval for RCUP201100007.

### **Biologist Notes and Recommendations:**

#### **History of SEATAC review of the D.E.L.T.A. Project**

The D.E.L.T.A. Project R2011-00090 was reviewed by SEATAC on 5 March 2012. SEATAC review considered the project from the standpoint of impacts to the defined Significant Ecological Area (SEA) of the Santa Clara River, SEA #23, which overlays over 50% of the project parcel. SEATAC evaluated the project using the materials posted on the website at <http://planning.lacounty.gov/case/view/r2011-00090/> SEATAC recommends measures that will enable the project to be compatible with the SEA, that is: fulfill the project's objectives and at the same time not harm the SEA in any manner that would impair its biological diversity and preclude its persistence in perpetuity.

SEATAC found that the materials were adequate for the project itself, but the materials did not address the SEATAC main concerns of cumulative impact to the Santa Clara River SEA by (1) runoff during storms from a confined animal facility and (2) the provision of subsidy to the nuisance animals, the native common raven (*Corvus corax*) and the non-native common starling (*Sturnus vulgaris*). Contaminated runoff is of critical concern to survival of endangered and threatened fish and amphibians, which have thin skin that continually absorbs chemicals from their aqueous habitat. Proliferation of nuisance animals has impacted and continues to impact the ecosystems of the Antelope Valley and the Santa Clara River as these species compete with native animals for nests and food, and in the case of the opportunistic ravens, increase predaceous impact.

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## **Impacts of the D.E.L.T.A. Project**

### **1. Water Quality**

The Santa Clara River nearby and downstream is habitat that depends on good water quality for a number of listed aquatic and semi-aquatic animals: essential habitat for the federally- and state-endangered unarmored threespine stickleback (the fish *Gasterosteus aculeatus williamsoni*), critical habitat for the federally- and state-endangered southern steelhead (the fish *Oncorhynchus tshawitscha*), critical habitat for the arroyo toad (*Anaxyrus californicus*), critical habitat for the California red-legged frog (*Rana draytonii*), habitat for the federally-threatened Santa Ana sucker (the fish *Catostomus santaanae*), habitat for the state species of concern arroyo chub (the fish *Gila orcuttii*), and habitat for other semi-aquatic state species of concern such as the western pond turtle (*Emys marmorata*) and the two-striped garter snake (*Thamnophis hammondi*). It is important to note that of five (5) native fish remaining extant in Los Angeles County, the Santa Clara River provides habitat for all but one, and the Los Angeles County part of the River and tributaries is the only known locality for the stickleback.

Water quality is also important to human residents, who use the aquifers for provision of potable water and swim in the Santa Clara River at recreation areas along the Soledad Canyon portion of the River.

### **2. Provision of subsidy of water and food to nuisance animals**

Although ravens have been residents of the desert since prehistoric times, in recent years their numbers in deserts have expanded enormously (1876% calculated by comparing observations in one locality between the 1960s and the decade following 2000). This expansion is coincident with the decline of a raven prey item, the federally- and state-threatened species, the desert tortoise, and raven expansion is one of the significant problems faced by the tortoise. Human activities such as development provide food in trash and pet rations and home sites in structures such as power lines. This is subsidy beyond what occurs in the natural desert system that ravens exploit as food and perches for survey for their prey and nest sites. (Ravens normally nest in inaccessible, high rocky areas which have an analog in basic requirements of height and inaccessibility in the powerline poles.) It is not unusual to find piles of juvenile tortoise shells under perches or nests on powerline poles and telephone poles in the desert. It is not known what other effects the desert raven population expansion is having. Wherever subsidy can be curtailed, it is important to do this, and there are some best management practices (BMPs) that can be implemented by this project.

Starlings are a bird that was imported from Europe into New York Central Park, and the species has expanded without further human aid across the continent. Starlings utilize subsidy like the ravens, and they are known competitors with native birds for nest sites

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and natural food. (There is no known specific relationship similar to that of ravens and desert tortoise, except that starlings are aggressive in commandeering nest sites and even nests built by other birds.) Starlings require a more mesic habitat than ravens, and Acton near the Santa Clara River is sufficiently mesic. The same BMPs as those for ravens can be used for the starlings.

### **History of Project Review by Dept. of Regional Planning subsequent to SEATAC review**

There has been discussion with D.E.L.T.A. that chiefly consisted of their refutation of the need to filter the facility's runoff and no discussion or proposals to curtail subsidy to the nuisance birds. One item of discussion was the amount of urine produced in a day by the facility, which was stated to be minimal with respect to the dilution of the Santa Clara River. Using their data, the staff biologist calculated that an estimate of the volume generating urine solids that would be washed into the River by the few, infrequent pulses of rainfall in the rainy season would amount to solids from over 417,000 liters/year, or over 110,300 gallons. The SEATAC recommendations were never addressed with any proposal from the Project as to how they might implement the recommendations. Eventually the Project did not respond to communications from the Planner, and the Project did not schedule a return to complete the SEATAC review.

### **Recommendations:**

**SEATAC finds that the Project would be compatible with the Santa Clara River SEA #23 provided that the SEATAC recommendations are incorporated in the project design.**

- 1. Follow SEATAC recommendations recorded in the minutes of 2012.03.05 to implement BMPs for water quality.**
  - a. Channel runoff (storm flows) to active filtration provided by a vault with exchangeable filters. Filters should target urine and fecal components and pollution and petrochemicals from the parking lot.**
  - b. Install bio-swales at the periphery of the project where sheet flow is expected. These bio-swales should utilize absorptive materials (wood fiber was suggested) that can be exchanged before each rainy season. The target materials are again urine solids and fecal pollution and petrochemicals from the parking lot.**
- 2. Analyze what measures can be used to lessen subsidy to the nuisance birds. Try implementing these measures until one is found that coincides with reduced nuisance bird numbers. These might include a. pick-up of spilled food along with feces and b. food dispensed automatically from closed containers on a timed schedule in amounts that would be totally consumed by the rescue animals.**