

California Native Plant Society

Los Angeles / Santa Monica Mts. Chapter

3908 Mandeville Canyon Road

Los Angeles, California 90049

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RE: Comments on Los Angeles County General Plan Public Review Draft: Appendix E

Dear Staff:

The Los Angeles / Santa Monica Mountains Chapter of the California Native Plant Society has 450 members in Los Angeles, San Fernando Valley and Santa Monica Mountains.

We are very interested in the progress of the General Plan, especially in Chapter 9: Conservation and Natural Resources Element, and in Appendix E: Significant Ecological Areas.

Here are some comments on Appendix E: Significant Ecological Areas:

SEA 2) Antelope Valley:

Criteria C and F: Mesquite bosque is declining due to wide-spread development drawing down groundwater. In the Antelope Valley this is an original natural biotic community that is dying out due to over-development without consideration of future water supplies. Mesquite bosque needs protection.

SEA 3) Cruzan Mesa Vernal Pools

Criteria B and E: Vernal pools are rare regionally. Vernal pools are very interesting scientifically because they represent an extreme natural biotic community and because they are good subjects for assessing the effects of drought and of climate change.

SEA 4) East San Gabriel Valley

Criteria B and C: California black walnut (*Juglans californica*) woodlands are limited in distribution both regionally and within the county. They used to be more widespread. The City of Los Angeles includes them in their protected tree ordinance. Is the California black walnut protected in Los Angeles County's Oak Ordinance? If not, then in all the SEAs the presence of *Juglans californica* woodlands should be noted as a special biotic community worthy of protection.

SEA 5) Griffith Park

Mountain lion (*Puma concolor*) is the top carnivore in Griffith Park. Please add it to the list of mammals. I ask that you consider expanding the Griffith Park SEA to include small undeveloped areas between residential development in canyons and parks along Mulholland and on the ridges. I have seen evidence and

been given evidence that mountain lions travel along Mulholland and may have cubs in locations like Stone Canyon. There are rare plants along the way as well. Braunton's type location for the milkvetch named after him is in the Santa Monica Mountains, probably near Mulholland's first reservoirs in Franklin Canyon. I haven't found it yet, but the soil is the right type. Griffith Park does not have the right soil (ancient marine sediments) for Braunton's milkvetch.

SEA 6) Harbor Lake

Criterion A has been met by the presence of a core population of fairy shrimp in the vernal pool and the habitat of the vernal pool.

SEA 9) Palos Verdes Peninsula and Coastline

Criterion A: Include the only known mainland population of *Crossosoma californicum* (near Forrestal Drive). It grows on an unusual geologic outcrop and is very old, according to Bart O'Brien, who checked it out a few years ago when he was on the staff of Rancho Santa Ana Botanic Garden.

SEA 11) Rio Hondo College Wildlife Sanctuary

Criteria B, C, and F are met by the California black walnut (*Juglans californica*) woodlands which are rapidly disappearing and need protection.

SEA 13) San Dimas Canyon and San Antonio Wash

If Frank G. Bonelli Park is in this SEA, then I recorded a core population of *Dudleya multicaulis* there on rock slabs near a horse trail. That meets Criteria A and E. It is an isolated, scientifically interesting site.

SEA 14) San Gabriel Canyon

Criterion E is met because the Braunton's milkvetch population there is the farthest east of any of the other known populations and is of scientific interest due to its isolation.

SEA 15) Santa Clara River

This SEA is losing floodplain resources and watershed values to channelization of the watershed drainages in Newhall Ranch and the channelization of the main river due to development. This was the most important natural water resource in the county. How are you protecting its resource values now?

SEA 17) Santa Monica Mountains

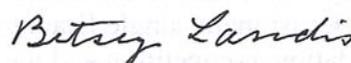
Please add the east and west ridges around the head of Mandeville Canyon to this SEA. There is a very rich west-east wildlife corridor extending from Topanga State Park through Rustic, Sullivan, and Mandeville Canyons with an excellent range of habitats. It includes San Vicente Mountain Park and the undeveloped area above Encino Reservoir.

SEA 18) Santa Susana Mountains and Simi Hills

Chatsworth Reservoir is not a superfund cleanup site to my knowledge. I am involved in the Santa Susana Field Lab cleanup meetings. That is not a superfund cleanup site. Where did that information come from?

Thank you for your consideration of these comments.

Sincerely,



Betsey Landis, Conservation Committee
Los Angeles / Santa Monica Mountains Chapter
California Native Plant Society