



United States Department of the Interior

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360-4207

In reply refer to:
L76 (SAMO)

April 11, 2013

Emma Howard
Los Angeles County Department of Regional Planning
320 W. Temple St., Room 1354
Los Angeles, CA 90012

Dear Ms. Howard:

The National Park Service (NPS) has reviewed the December 2012 Draft Significant Ecological Areas (SEA) Ordinance. The draft ordinance would update the SEA program component in the Conservation and Open Space Element in the Los Angeles County General Plan and would replace the original SEA Ordinance adopted in 1982. The draft ordinance proposes amendments to Title 22—Planning and Zoning—of the Los Angeles County Code.

NPS appreciates the opportunity to comment on the draft SEA ordinance. In general, NPS provides comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of state and local units of government with authority to prevent or minimize adverse uses. We assume a neutral position and do not support or oppose land development. We offer the following comments.

Overall, NPS appreciates the County's extensive reconsideration of valuable natural resources throughout the County during the SEA Update Study and culminating in the current draft of the SEA Ordinance. In particular, the inclusion of habitat connectivity as a natural resource value is a tremendous step forward in planning for protection of biodiversity. In a letter to the County dated November 15, 1999, NPS recommended creating a Santa Monica Mountains SEA. We wish to thank the County for inclusion of the Santa Monica Mountains SEA (No. 22), which covers most of the Santa Monica Mountains west of the 405 freeway. The County's designation complements the federal recognition of the significant natural resources of SMMNRA, collectively representative of the coastal Mediterranean-type ecosystem. The local designation is also consistent with Congress's intent to have state and local governments exercise their authority to prevent or minimize adverse uses of the Santa Monica Mountains (P.L. 95-625, §507(a)(3)).

Santa Monica Mountains Conservancy (SMMC) Comments

SMMC's Board of Directors includes NPS as a voting member. SMMC has submitted comment letters on past drafts of the SEA Ordinance and on the current draft. NPS has reviewed SMMC's comment letter dated April 10, 2013, and hereby incorporates their

comments by reference. NPS comments that follow offer additional information or emphasize points made in the SMMC letter.

SEA Definition: Section 22.08.190

Clarification of the SEA definition is needed to avoid unnecessarily narrow interpretation of what resources are to be protected under the SEA program. The draft ordinance's definition of an SEA follows:

"...any portion of a lot or parcel of land containing an ecologically important land or water system that supports valuable habitat for plants and animals integral to the preservation of rare, threatened or endangered species and to the conservation of biological diversity in the County. Significant Ecological Areas are identified on the Significant Ecological Areas and Coastal Resource Areas Policy Map of the General Plan..." (Pg. 1, Draft SEA Ordinance, December 20, 2012)

NPS recommends the County clarify whether or not "rare, threatened, or endangered species" refers only to officially listed species under the federal and state Endangered Species Acts. If the definition includes more than only officially listed species, we suggest amending the language to read: "officially listed species under state and federal laws and other rare, threatened, or endangered species that contribute to the conservation of biological diversity in Los Angeles County". The revised language would also address a possible misinterpretation that an SEA must contain habitat that serves only officially listed species *and* must contribute to conservation of biodiversity.

We bring forward this needed clarification because much of the biodiversity within the proposed Santa Monica Mountains SEA (No. 22) is due to both a high number of listed or otherwise sensitive species and the high diversity of plant assemblages. Furthermore, the County's description of this SEA acknowledges the global rarity of the Mediterranean-type ecosystem and the unique plant assemblage in the Santa Monica Mountains. Neither the ecosystem nor the numerous plant communities are officially listed for protection under federal or state laws.

To illustrate the importance of considering all sensitive species and their role in an area's biodiversity, we offer the following information. The County's Santa Monica Mountains SEA write-up describes numerous locations of state or federally listed plants and lists 56 Manual of California Vegetation (MCV) communities. NPS scientists have also documented 49 plant species that are either federally or state-listed or are on California Native Plant Society's (CNPS) sensitive plant lists. Additionally, the scientists have inventoried 92 other plant species that are uncommon in the Santa Monica Mountains area, but are more common elsewhere. These plants offer insights into changes in the species' former or future ranges and patterns of distribution, such as might be affected by climate change.

Definitions: 22.52.2610

We suggest adding “habitat linkages” and “wildlife corridors” to the definitions. NPS is available to provide input on the definitions.

Development Standards: 22.52.2640

NPS concurs with the standards for wildlife-permeable fencing, fuel modification zones, and mature tree setbacks.

In Item F, Streets and Highways, all references to “wilderness crossing points” should be revised to “wildlife crossing structures”.

Item H, Habitat Linkages, prohibits encroachment into the linkage, as defined when the width of the existing linkage would be reduced to less than 1,000 feet at any point along the habitat linkage. Similarly, Item I, Wildlife Corridors, prohibits encroachment as defined when the width of the wildlife corridor would be reduced to less than 200 feet at any point along the corridor. We thank the County for incorporating wildlife habitat connectivity into the development standards. This new addition to the standards for protecting natural resources is welcome and reflects a considerable new body of scientific research concerning the impacts of habitat fragmentation, much of which study has occurred since the original SEA Ordinance was adopted in 1982.

NPS scientists at Santa Monica Mountains National Recreation Area have extensively studied wildlife movement and the size of large carnivores’ home range needs. NPS recommends habitat linkages not be constricted to less than 3,000 feet at any particular point. It is difficult to provide more specific comments or flexibility in the width without having definitions for habitat linkages and wildlife corridors that would give context to evaluating width thresholds. Also, the forthcoming Habitat Linkages and Developed and Disturbed Areas maps would provide more information upon which to evaluate the thresholds. NPS judges a constriction of 1,000 feet to be narrow for a habitat linkage. NPS also finds it difficult to assess whether 200 feet would be adequate for a wildlife corridor. Factors to consider include, but are not limited to, the kind of habitat available within the habitat linkage or wildlife corridor, the size of the habitat linkage, or the length of the habitat constriction or corridor. At minimum, we suggest the draft SEA Ordinance incorporate definitions for habitat linkages and wildlife corridors and include a requirement to consult with the County biologist and local resource agency and/or academic wildlife scientists on the appropriate minimum widths for either habitat connectivity feature within the context of the proposed project and the greater surrounding area.

Item J, Species, limits ground disturbance to no more than 50% of the habitat for a species of special status identified in the particular SEA’s description in the General Plan, or 50% of the parcel of land. Similar to our comments for the definition of an SEA, we find the assignment of maximum ground disturbance tied only to species of special status to be limiting, and possibly may defeat the SEA program’s goal to preserve biological diversity. We also find

that a strict percentage for ground disturbance would not allow flexibility to address particular circumstances surrounding the presence of a sensitive species discovered at a project site. NPS suggests revising this development standard to build in flexibility for the kind of species discovered, the size of the parcel, the distribution of the species within the region, and similar factors that could affect thresholds for allowable ground disturbance.

Item K.3.c, Riparian Resources, assigns a setback of 75 feet from the outer edge of riparian habitat for watercourses that are less than 50 feet wide in a wet year. NPS understands the SEA Ordinance applies to the entire County. However, we find it would be reasonable and more consistent for landowner understanding if the setback were 100 feet from the outer edge of riparian habitat to be consistent with the setback definition typical of lands within the Coastal Zone. It is unclear how the 75-foot setback was selected. Studies have found a 100-foot buffer to be the minimum necessary to protect water quality, and 300 feet to protect wildlife habitat (Wenger, 1999; Lowerance, et al., 1988).

Permitted Uses: 22.52.2650

Item A.1 would allow review of individual single family residences under a Site Plan Review, which would preclude external public review. The selection of a Site Plan Review or a CUP as the appropriate permitting path should be based on the location, size, and access needs of a proposed residence. Current patterns of parkland ownership and existing development have placed remaining developable private lands in remote locations that would have considerable potential to impact habitat connectivity and introduce edge effects in an otherwise intact natural area.

Item A.3 would allow Site Plan Review of proposed uses with previously issued, but now expired, entitlements for a similar kind of new project. NPS finds that, without knowledge of the state of scientific knowledge at the time of the original entitlement review, i.e. of the site's resources or how resources may be impacted, and how the previously entitled project was either implemented or not, natural resources within the SEA would be at risk of loss. We suggest this category of expired entitlements be placed in potentially either the Type A or B CUP requirement.

Open Space Dedications: 22.52.2670

Item E.6 addresses ownership and management of open space dedications. Open space may be conveyed to a governmental agency, a qualified non-profit land conservation organization, or a homeowners association. NPS concurs with conveyance to governmental agencies or qualified non-profit organization, because these entities have staff and resources to provide the necessary stewardship of the sensitive resources for which the SEA was assigned. Homeowners associations are not natural resource management-oriented and are not qualified to manage natural resources. Furthermore, there is often no means for oversight in the event that open space protection is being inadequately managed. We suggest removing homeowners associations as a viable recipient of open space dedications.

Thank you for the opportunity to comment. If you have questions, please call Melanie Beck at (805)370-2346.

Sincerely,



David Szymanski
Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Craig Sap, Superintendent, Angeles District, State Department of Parks and Recreation
Clark Stevens, District Manager, Resource Conservation District of the Santa Monica Mountains

Attachment: Rare and Uncommon Plant Species in the Santa Monica Mountains

Rare and Uncommon Plant Species in the Santa Monica Mountains

Prepared by National Park Service, Santa Monica Mountains National Recreation Area

Federal:

E = Endangered
 PE = Proposed Endangered (candidate)
 T = Threatened
 SC = Species of Concern

State:

E = Endangered
 CE = Candidate Endangered
 T = Threatened
 R = Rare

CNPS:

1A = Presumed extinct in CA.
 1B = Rare of endangered in California or elsewhere.
 2 = Rare of endangered in California, more common elsewhere
 3 = Plants for which we need more information- Review List
 4 = Plants of limited distribution- Watch List

Ordering Hierarchy: 'Fed E, State E, Fed T, State T, State R, Fed SC, CNPS-1, -2, -3, -4 (alphabetical within rank)

I. Sensitive Plant Species that Occur in the Santa Monica Mountains - Simi Hills Area

	Species	State	Fed	CNPS	Notes
1	<i>Abronia maritima</i>			4	
2	<i>Asplenium vespertinum</i>			4	
3	<i>Astragalus brauntonii</i> ²	-	E	1B	
4	<i>Atriplex coulteri</i>			1B	
5	<i>Baccharis malibuensis</i> ¹			1B	
6	<i>Baccharis plummerae</i> ssp. <i>plummerae</i>			4	
7	<i>Calandrinia breweri</i>			4	
8	<i>Calandrinia maritima</i>			4	
9	<i>Calochortus catalinae</i>			4	
10	<i>Calochortus plummerae</i>			1B	
11	<i>Camissonia lewisii</i>			3	
12	<i>Cercocarpus betuloides</i> var. <i>blancheae</i> ³			4	
13	<i>Chamaebatia australis</i>			4	
14	<i>Chorizanthe parryi</i> var. <i>fernandina</i>	CE	PE	1B	
15	<i>Chorizanthe parryi</i> var. <i>parryi</i>	-	SC	3	
16	<i>Chorizanthe wheeleri</i>			4	
17	<i>Convolvulus simulans</i>			4	
18	<i>Cordylanthus maritimus</i> ssp. <i>maritimus</i>	E	E	1B	
19	<i>Delphinium parryi</i> ssp. <i>blochmaniae</i>	-	SC	1B	
20	<i>Dichondra occidentalis</i>			4	
21	<i>Dudleya abramsii</i> ssp. <i>parva</i> ¹	-	T	1B	
22	<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	-	SC	1B	
23	<i>Dudleya cymosa</i> ssp. <i>agourensis</i> ¹	-	T	1B	
24	<i>Dudleya cymosa</i> ssp. <i>marcescens</i> ¹	R	T	1B	
25	<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i> ²	-	T	1B	
26	<i>Dudleya multicaulis</i>	-	SC	1B	
27	<i>Dudleya verityi</i> ¹	-	T	1B	
28	<i>Eriogonum crocatum</i> ¹	R	SC	1B	
29	<i>Erysimum insulare</i> ssp. <i>suffrutescens</i>			4	
30	<i>Galium cliftonsmithii</i>			4	
31	<i>Hemizonia minthornii</i> ¹	R	SC	1B	
32	<i>Hordeum intercedens</i>			3	
33	<i>Juglans californica</i> var. <i>californica</i>			4	
34	<i>Juncus acutus</i> ssp. <i>leopoldii</i>			4	
35	<i>Lasthenia glabrata</i> var. <i>coulteri</i>	-	SC	1B	
36	<i>Lepechinia fragrans</i>			4	
37	<i>Lilium humboldtii</i> ssp. <i>ocellatum</i>			4	
38	<i>Lycium californicum</i>			4	

	Species	State	Fed	CNPS	Notes
39	<i>Microseris douglasii</i> ssp. <i>platycarpa</i>			4	
40	<i>Nama stenocarpum</i>			2	
41	<i>Navarretia ojaiensis</i>			1B	
42	<i>Nolina cismontana</i>	-	SC	1B	
43	<i>Pentachaeta lyonii</i> ¹	E	E	1B	
44	<i>Polygala cornuta</i> var. <i>fishiae</i>			4	
45	<i>Senecio aphanactis</i>			2	
46	<i>Suaeda esteroa</i>			1B	
47	<i>Suaeda taxifolia</i>			4	
48	<i>Thelypteris puberula</i> var. <i>sonorensis</i>			2	
49	<i>Thysanocarphus conchuliferus</i>			1B	

¹ Endemic to the Santa Monica Mountains and

² Major occurrence in SMM-SH area, there are a

³ Only mainland occurrence.

II. Sensitive Plant Species that Appear to be Extirpated in the Santa Monica

	Species	State	Fed	CNPS	Notes
1	<i>Astragalus pychostachyus</i> var. <i>lanosissimus</i>	E	E	1B	
2	<i>Astragalus tener</i> var. <i>titi</i>	E	E	1B	
3	<i>Dithyrea maritima</i>	T	SC	1B	
4	<i>Mucronea californica</i>			4	
5	<i>Muhlenbergia californica</i>			4	

III. Plant Species Uncommon in SMM & Simi Hills but more common elsewhere

	Species	State	Fed	CNPS	Notes
	Ferns				
1	<i>Cheilanthes cooperae</i>				
2	<i>Cheilanthes covillei</i>				
3	<i>Cheilanthes newberryi</i>				
4	<i>Notholaena californica</i>				Uncommon in SMM - Simi Hills
5	<i>Woodwardia fimbriata</i>				
	Flowering plants - Dicots				
6	<i>Amorpha californica</i> var. <i>californica</i>				
7	<i>Boykinia occidentalis</i>				Rare in SMM - Simi Hills; only location is Santa Ynez Canyon
8	<i>Boykinia rotundifolia</i>				Rare in SMM - Simi Hills; only location is Upper Sycamore Canyon
9	<i>Brodiaea terrestris</i> ssp. <i>kernensis</i>				
10	<i>Camissonia boothii</i> ssp. <i>decorticans</i>				
11	<i>Centaurium exaltatum</i>				Rare in SMM - Simi Hills; 3 occurrences First collected in SMM July 2005.
12	<i>Chamaebatia australis</i>				One small population in Rocky Oaks; disjunct distribution
13	<i>Collinsia parryi</i>				Two occurrences; species with narrow range
14	<i>Eriogonum angulosum</i>				Two occurrences (less than 1/4 mile apart)
15	<i>Eriogonum wrightii</i> var. <i>membranaceum</i>				Uncommon in SMM - Simi Hills
16	<i>Gilia letalea</i> subsp. <i>bicolor</i>				Rare in SMM - Simi Hills; disjunct population
17	<i>Githopsis diffusa</i> ssp. <i>diffusa</i>				Collected 1940s & not again till 2004. 5 current known locations in SMM
18	<i>Horkelia cuneata</i> ssp. <i>cuneata</i>				One occurrence
19	<i>Juniperus californica</i>				Rare in SMM - Simi Hills
20	<i>Lastarriaea coriacea</i>				Rare; one occurrence in Simi Hills after Topanga Fire; not since since the first spring after Topanga Fire
21	<i>Lessingia glandulifera</i>				Rare in SMM - Simi Hills
22	<i>Lewisia rediviva</i>				3 occurrences--all 3 close to 1/4 mile apart from each other; disjunct population
23	<i>Muilla maritima</i>				Rare in SMM - Simi Hills; one occurrence
24	<i>Opuntia basilaris</i> var. <i>basilaris</i>				
25	<i>Orobanche uniflora</i>				Violet form; Rare in SMM - Simi Hills

Species	State	Fed	CNPS	Notes
26	<i>Quercus douglasii</i>			One occurrence
27	<i>Salix gooddingii</i>			Rare in SMM - Simi Hills
28	<i>Sarcostemma cynanchoides</i> ssp. <i>hartwegii</i>			Rare in SMM - Simi Hills
29	<i>Sedum spathulifolium</i>			One disjunct population
30	<i>Silene verecunda</i> ssp. <i>platyota</i>			Two small populations
31	<i>Stanleya pinnata</i>			Rare in SMM - Simi Hills
32	Monocots			
33	<i>Carex globosa</i>			Uncommon in SMM - Simi Hills
34	<i>Carex spissa</i>			Uncommon in SMM - Simi Hills
35	<i>Juncus rugulosus</i>			Rare in SMM - Simi Hills
36	<i>Koeleria macrantha</i> [<i>K. cristata</i>]			Rare in SMM - Simi Hills

IV. Other Plant Species Rare and Uncommon in SMM - Simi Hills with no legal status but should be protected as locally rare/uncommon species

Species	State	Fed	CNPS	Notes
1	<i>Apocynum cannabinum</i>			Rare in SMM - Simi Hills; has cultural significance to native Americans
2	<i>Arabis sparsiflora</i> var. <i>californica</i>			Rare in SMM - Simi Hills
3	<i>Arabis glabra</i>			Rare in SMM - Simi Hills
4	<i>Aster lanceolatus</i> ssp. <i>hesperius</i>			Uncommon in SMM - Simi Hills
5	<i>Astragalus gambelianus</i>			Uncommon in SMM - Simi Hills
6	<i>Astragalus didymocarpus</i>			Uncommon in SMM - Simi Hills
7	<i>Astragalus trichopodus</i> var. <i>lonchus</i>			Uncommon in SMM - Simi Hills
8	<i>Atriplex watsonii</i>			Rare in SMM - Simi Hills
9	<i>Barbarea orthoceras</i>			Uncommon in SMM - Simi Hills
10	<i>Batis maritima</i>			Rare in SMM - Simi Hills
11	<i>Berberis pinnata</i> ssp. <i>pinnata</i>			Rare in SMM - Simi Hills
12	<i>Bowlesia incana</i>			Uncommon in SMM - Simi Hills
13	<i>Calystegia soldanella</i>			Uncommon in SMM - Simi Hills
14	<i>Calystegia purpurata</i> ssp. <i>purpurata</i>			Uncommon in SMM - Simi Hills
15	<i>Calystegia malacophylla</i>			Rare in SMM - Simi Hills
16	<i>Cardionema ramosissimum</i>			Rare in SMM - Simi Hills
17	<i>Caulanthus coulteri</i>			Rare in SMM - Simi Hills
18	<i>Caulanthus heterophyllus</i> var. <i>heterophyllus</i>			Uncommon in SMM - Simi Hills
19	<i>Ceanothus leucodermis</i>			Uncommon in SMM - Simi Hills
20	<i>Comarostaphylis diversifolia</i> ssp. <i>planifolia</i>			Uncommon in SMM - Simi Hills
21	<i>Coreopsis californica</i>			Rare in SMM - Simi Hills
22	<i>Cornus glabrata</i>			Rare in SMM - Simi Hills
23	<i>Epilobium pygmaeum</i>			Rare in SMM - Simi Hills
24	<i>Eriastrum densifolium</i> ssp. <i>elongatum</i>			Rare in SMM - Simi Hills
25	<i>Eriastrum filifolium</i>			Rare in SMM - Simi Hills
26	<i>Eriogonum cithariforme</i>			Uncommon in SMM - Simi Hills
27	<i>Eriogonum roseum</i>			Rare in SMM - Simi Hills
28	<i>Gilia clivorum</i>			Uncommon in SMM - Simi Hills
29	<i>Gilia splendens</i>			Rare in SMM - Simi Hills
30	<i>Glycyrrhiza lepidota</i>			Rare in SMM - Simi Hills
31	<i>Iva axillaris</i> ssp. <i>robustior</i>			Uncommon in SMM - Simi Hills
32	<i>Layia platyglossa</i>			Rare in SMM - Simi Hills
33	<i>Linanthus pygmaeus</i> ssp. <i>continentalis</i>			Rare in SMM - Simi Hills
34	<i>Lobelia dunnii</i> var. <i>serrata</i>			Rare in SMM - Simi Hills
35	<i>Loeflingia squarrosa</i> var. <i>squarrosa</i>			Rare in SMM - Simi Hills
36	<i>Lonicera hispidula</i> var. <i>vacillans</i>			Rare in SMM - Simi Hills
37	<i>Malacothrix saxatilis</i> var. <i>saxatilis</i>			Rare in SMM - Simi Hills
38	<i>Marah fabaceus</i>			Rare in SMM - Simi Hills

	Species	State	Fed	CNPS	Notes
39	<i>Mimulus floribundus</i>				Uncommon in SMM - Simi Hills
40	<i>Mimulus pilosus</i>				Rare in SMM - Simi Hills
41	<i>Minuartia douglasii</i>				Uncommon in SMM - Simi Hills
42	<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>				Rare in SMM - Simi Hills
43	<i>Monardella lanceolata</i>				Rare in SMM - Simi Hills
44	<i>Monolopia lanceolata</i>				Rare in SMM - Simi Hills
45	<i>Myrica californica</i>				Rare in SMM - Simi Hills
46	<i>Navarretia mellita</i>				Rare in SMM - Simi Hills
47	<i>Nemacladus ramosissimus</i>				Rare in SMM - Simi Hills
48	<i>Orobanche parishii</i>				Rare in SMM - Simi Hills; undescribed taxa
49	<i>Platystemon californicus</i>				Uncommon in SMM - Simi Hills
50	<i>Polycarpon depressum</i>				Rare in SMM - Simi Hills
51	<i>Rupertia physodes</i>				Uncommon in SMM - Simi Hills
52	<i>Samolus parviflorus</i>				Rare in SMM - Simi Hills
53	<i>Satureja douglasii</i>				Rare in SMM - Simi Hills
54	<i>Suaeda calceoliformis</i>				Rare in SMM - Simi Hills
55	<i>Triodanis biflora</i>				Uncommon in SMM - Simi Hills
56	<i>Tropidocarpum gracile</i>				Uncommon in SMM - Simi Hills