



SANTA MONICA MOUNTAINS CONSERVANCY

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George Malone, Section Head
General Plan Development Section
Los Angeles County, Department of Regional Planning
320 West Temple Street, Room 13th Floor
Los Angeles, California 90012

**Comments on Los Angeles County
Significant Ecological Area Update Study**

Dear Mr. Malone:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Los Angeles County Significant Ecological Area Update Study 2000 documents prepared by the consultant team for the County of Los Angeles (County) (PCR *et al.* 2000a, 2000b). The County is revising the boundaries and regulatory policies for the existing 61 Significant Ecological Areas (SEAs) as part of the General Plan update effort. The objective of the SEA program has been expanded to include the future sustainability of biotic diversity in the County through the application of more current practices in conservation biology, primarily by consolidation into larger, interconnected SEAs (PCR *et al.* 2000b).

The Conservancy commends the County and the consultant team on the excellent work done for the SEA Update Study and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy offers the following specific comments, and we look forward to working with the County and other interested parties to include the SEAs in the General Plan as recommended by the consultants.

Full Support for Specific SEA Expansions

The Conservancy fully supports the consultants' proposal to expand several existing SEAs, including the following: Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara River, and the East San Gabriel Valley. The entire Santa Monica Mountains range represents the nation's premier example of a Mediterranean ecosystem and meets all of the criteria for inclusion as an SEA. The San Andreas Rim Zone encompasses several regionally significant linkages for wildlife movement and globally unique vegetation communities. The proposed Antelope Valley SEA provides crucial

connectivity for wildlife movement, encompassing open washes, historic floodplains, riparian communities, desert scrub, and joshua tree woodlands (PCR *et al.* 2000b). Along the Santa Clara River, which is known to support numerous state and federally-listed species, the SEA boundary was proposed to be expanded along the western and northwestern edge of the Angeles National Forest, both inside and outside of the forest boundary. The proposed East San Gabriel Valley SEA contains critical habitat and a core population of the federally threatened coastal California gnatcatcher (*Polioptila californica californica*), and supports numerous plant communities restricted in distribution.

Maximum Inclusion of SEAs in Incorporated Areas

Some proposed SEAs that were studied included areas within a city jurisdiction while some SEAs were not studied because they occurred within a city jurisdiction. Some cities recognize the importance of existing SEAs in their General Plans, Zoning Ordinances, and special protective guidelines (PCR *et al.* 2000a). In coordination with other jurisdictions, the County should analyze the areas of existing SEAs within city jurisdictions in the geographic limits of Los Angeles County. At the very least, these areas of SEAs should be retained, as recommended by the consultant team (p. v; PCR *et al.* 2000a). For example, the Griffith Park existing SEA No. 37 was not studied because it is entirely within the City of Los Angeles jurisdiction (PCR *et al.* 2000a). Griffith Park and any remaining contiguous habitat should be included. Tujunga Valley/Hansen Dam and Verdugo Mountains existing SEAs should also be retained. In addition, because Ballona Creek will be studied later by a team comprised of the County and City of Los Angeles, a mechanism should be in place to include it later as an SEA.

Inclusion of Mandeville and Hoag Canyons in the Santa Monica Mountains SEA

The Conservancy recommends that the Santa Monica Mountains SEA be expanded to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon. This would provide for greater protection for the corridor used by wildlife to travel from the 405 Freeway to Griffith Park. In addition, both canyons contain core habitat values. Hoag Canyon contains the best example of sycamore and oak woodlands in the Santa Monica Mountains east of Topanga Canyon.

Additions to the Santa Susana Mountains/Simi Hills SEA

The Conservancy recommends adding to the proposed Santa Susana Mountains/Simi Hills SEA an area encompassing Browns Canyon and part of Mormon Canyon (see Enclosure).

Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. With the exception of adjacent Devil Canyon, all other drainages on the southern-face of the Santa Susana Mountains within Los Angeles County are developed along their full lengths. Together, the Browns and Devil Canyon watersheds form the most ecologically rich block of habitat in this portion of the mountain range.

We concur with Don Mullally (see February 10, 2001, comment letter) that the wildlife corridors at Fremont Pass and Newhall Pass, located north of the intersection of the 14 and 5 Freeways, and connecting the San Gabriel Mountains to the Santa Susana Mountains, should be added to one of the SEAs (e.g., Santa Susana/Simi Hills SEA). This triangle of land between the San Gabriel Mountains and the Santa Susana Mountains is essential to maintain connectivity between the ranges. Over 75% of the undeveloped land in this triangle is of SEA quality with high quality oak woodland and big-cone douglas fir. We also concur with Mr. Mullally that the discussion of plant communities for the Santa Susana Mountains should be more extensive, including such plant communities as big-cone douglas fir associations, walnut woodlands, and native grasslands.

The Conservancy recommends that portions of the Pico Canyon watershed, as shown on the Enclosure, be included in this SEA. Much of this land is adjacent to extensive public ownership and is part of the core habitat area comprising the adjacent SEA.

Expansion of San Gabriel Canyon SEA to include Altadena and La Crescenta Foothills

The Conservancy recommends that the proposed San Gabriel Canyon SEA be expanded westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon. This proposed expansion encompasses pristine chaparral, oak woodland, and riparian canyon bottoms. For example, Lower Millard Canyon in the Altadena foothills contains dense riparian woodland and heritage oak trees on upland shelves. These woodlands support a rich variety of warblers and other locally rare birds, reptiles, and amphibians. Animal species are able to move to different elevations in these canyons in response to seasonal changes and longer-term conditions such as drought.

These foothills of the San Gabriel Mountains provide for essential east-west wildlife habitat linkages between the north-south trending canyons. The SEA boundary must be moved westward to provide a complete east-west linkage system. An adequate lower elevation habitat linkage system is not contained in the higher elevation Angeles National Forest.

Concurrence with WCCA

The Conservancy concurs with the Wildlife Corridor Conservation Authority's recommendations adopted by their Governing Board regarding the proposed Puente Hills SEA in their May 2001 letter to the County.

Use Watershed Approach on Santa Clara River SEA

California Native Plant Society (CNPS) has recommended utilizing a watershed approach to define the SEAs. This approach should be considered by the County, particularly for the proposed Santa Clara River SEA. The Santa Clara River watershed including the river proper, surrounding upland areas, and tributaries have been documented to support numerous listed and otherwise sensitive species (PCR *et al.* 2000b). These species depend on substantial portions of undisturbed watershed. For this reason, the SEA must include additional drainages and slopes surrounding the Santa Clara River proper.

The Conservancy has previously commented to the County in reference to the Newhall Ranch Specific Plan and Draft Environmental Impact Report that a specific area be must be preserved (letter dated February 11, 1997). This includes a continuous habitat connection and natural land trail corridor linking the existing Santa Clara River SEA No. 23 and the northern tip of the existing Santa Susana Mountains SEA No. 20. This also includes a prominent ridgeline, that defines the northern boundary of the existing SEA 20, separating the East Fork of Salt Canyon from the principal Potrero Canyon development area. It appears that the proposed Santa Clara River SEA contains this area, but it is difficult to determine this based on the maps provided. We request that this be verified by the County.

Inclusion of a Baldwin Hills SEA

The Land Capability/Suitability Study SEA Report (England and Nelson 1976), lists Baldwin Hills as SEA No. 38, but does not appear to be addressed in the SEA Update Study. The County and the Conservancy are members of the Baldwin Hills Regional Conservation Authority formed to coordinate open space preservation actions in the Baldwin Hills. A new state agency, the Baldwin Hills Conservancy, was established in January of this year. The Baldwin Hills supports a reasonably extensive example of coastal sage scrub left in the Los Angeles Basin. Coastal sage scrub is a California Department of Fish and Game sensitive rare natural community that has been reduced in range significantly and the Baldwin Hills would likely meet the criteria for an SEA.

Support for Implementation of Land Use Management Practices Guidelines

Comprehensive Land Use Management Practices are recommended for all projects within SEAs, along with specific management practices for each proposed SEA (PCR *et al.* 2000a). These general and specific guidelines include limiting the percentage of disturbance in the SEAs to no more than 20 percent, providing buffers for rare plant communities such as riparian forests, and limiting the density of development in the SEAs. The Conservancy agrees that land use management guidelines such as those proposed in the SEA documents, or ones which provide even more protection, must be implemented to preserve the integrity of the SEAs.

We also support CNPS's recommendation that additional ordinances be considered. These ordinances should be explored further and could include the Land Use Management Practices Guidelines in the subject document and CNPS's specific recommendations. In particular, they should include: requiring wildlife-friendly fencing in linkages or corridors, preserving habitat, requiring publicly-held conservation easements on ungraded land, as well as limiting impermeable surface area.

Expansion of Selection Criteria to Include Other Sensitive Species

Although the revised draft of selection criteria has already been distributed for review (p. 9; PCR *et al.* 2000a), please consider the following comment. Criterion A is limited to "the habitat of core populations of endangered or threatened plant or animal species," and does not include rare, candidate or proposed species. It would be logical to focus planning and resources on protecting core populations of rare species, in addition to threatened and endangered species, in order to reduce the likelihood of these species becoming listed in the future. The Conservancy also recommends adding "species previously thought to be extinct" to this criterion. In the rare and fortunate event that a species that was previously thought to be extinct is rediscovered, that species would merit maximum protection, including designating the area which it inhabits as an SEA.

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Thank you for the opportunity to comment on this document. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,



MICHAEL BERGER
Chairperson

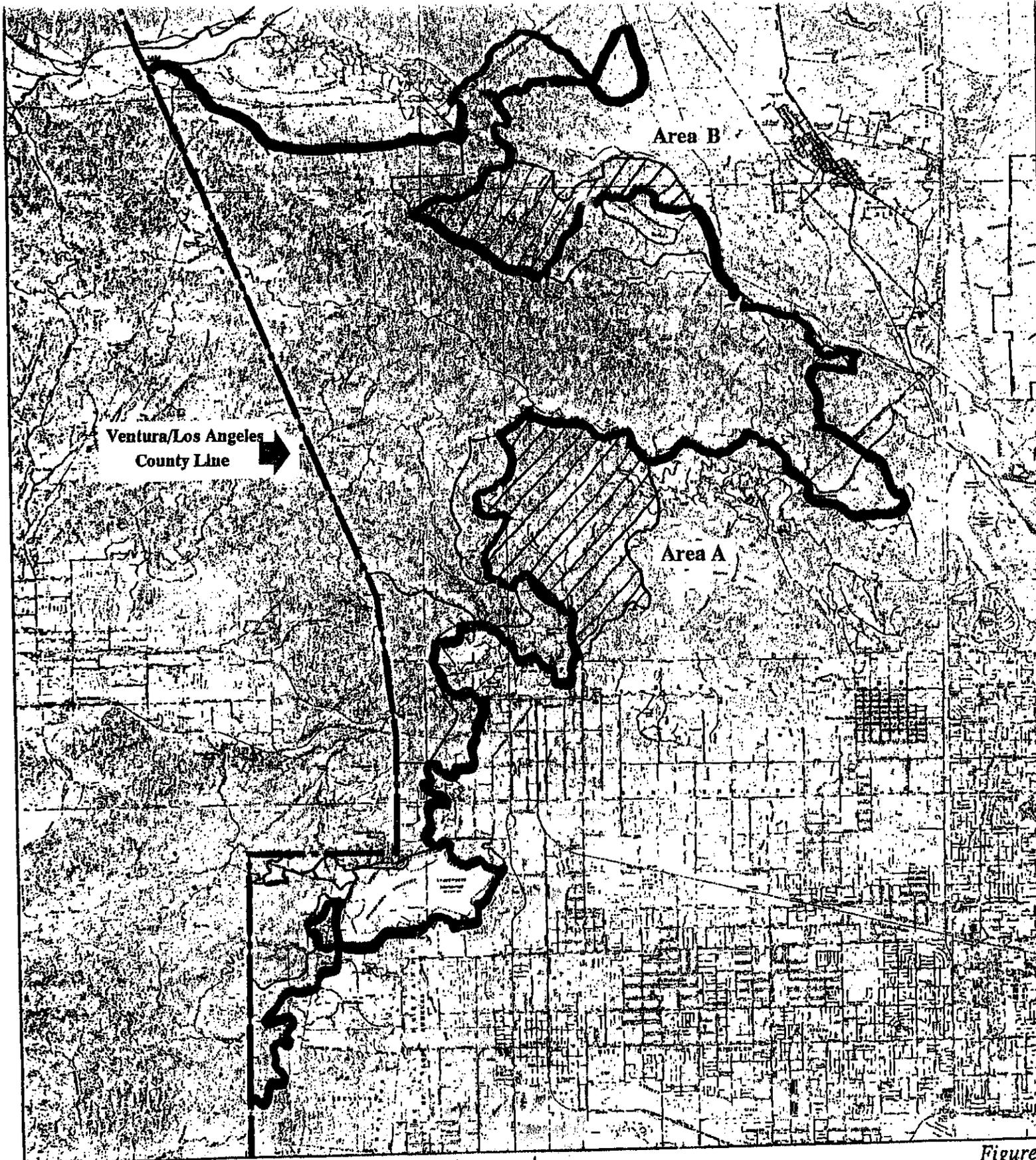
Enclosures (3)

Literature cited

England and Nelson Environmental Consultants. 1976. Land Capability/Suitability Study Los Angeles County General Plan Revision Program Significant Ecological Areas Report. Prepared for Los Angeles County Department of Regional Planning and Environmental Systems Research Institute.

PCR Services Corporation (PCR), Frank Havore & Associates, and FORMA Systems. 2000a. Los Angeles County Significant Ecological Area Update Study 2000 Background Report. Prepared for Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.



-  Proposed SEA Boundary
-  Existing SEA Boundary
-  Angeles National Forest

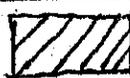
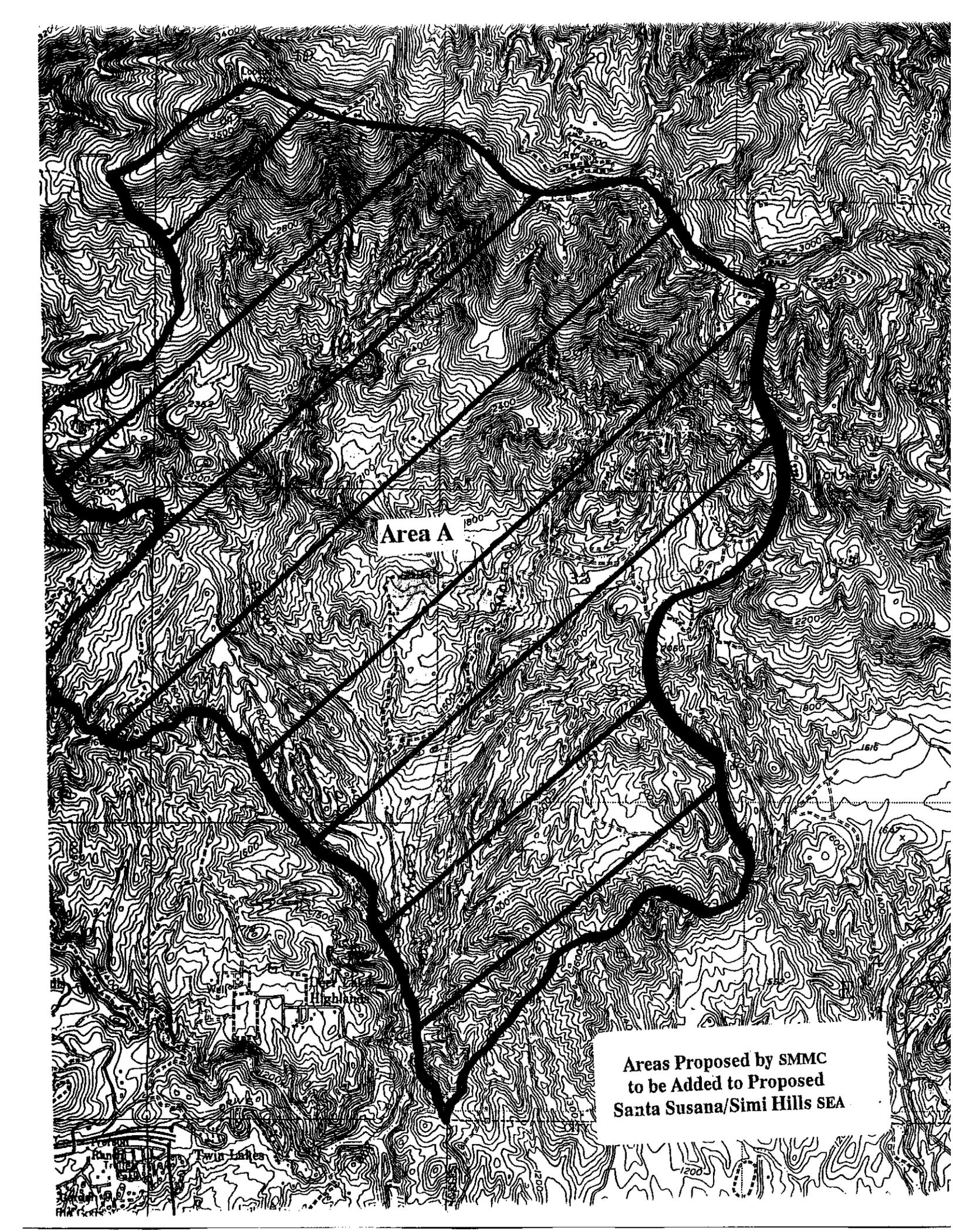

 Areas Proposed by SMMC
 to be Added to Proposed
 Santa Susana/Simi Hills SEA

Figure
 Santa Susana Mountains/Simi Hill
 Significant Ecological Area
 Existing and Proposed Boundaries

0 9400
 Feet

FORMA System
 10/24

A detailed topographic map of the Santa Susana/Simi Hills region, showing contour lines and elevation. A large, irregularly shaped area is outlined in thick black lines and labeled "Area A". The map includes various geographical features, roads, and place names. The text "Area A" is centered within the outlined region. In the bottom right corner, there is a white box containing text. At the bottom left, there are labels for "Twin Lakes" and "Run".

Area A

Areas Proposed by SMMC
to be Added to Proposed
Santa Susana/Simi Hills SEA

Twin Lakes
Run

Areas Proposed by SMMC
to be Added to Proposed
Santa Susana/Simi Hills SEA

Area B

