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October 9, 2013

Ms. Nooshin Paidar, Supervising Regional Planner
Los Angeles County
Department of Regional Planning, Land Divisions
320 W. Temple Street, Suite 1382
Los Angeles, CA 90012
<http://planning.lacounty.gov>

Subject: Juniper Woodland Conservation Efforts in Los Angeles County

Dear Ms. Paidar:

This letter is in response to a request made by the Los Angeles County Department of Regional Planning (LACDRP) during the August 1, 2013 conference call with the Department of Fish and Wildlife (Department). During the conference call, the Department expressed concern regarding the continued loss of juniper woodlands within the County of Los Angeles. LACDRP requested the Department submit a letter which articulates those concerns and therefore assist LACDRP during impact analysis and planning-decision efforts during their project review process.

The California Department of Fish and Wildlife (Department) has concerns regarding the cumulative loss of California juniper woodland (*Juniperus californica*, juniper woodland) within the County of Los Angeles (County) and particularly within the Acton area. These losses are a result of continued development, fuel modification, and human-caused wildfire. Juniper woodland includes stands where California junipers are dominant or co-dominant (Sawyer, et al. 2009). These woodlands support a high diversity of plant and animal species and provide important wildlife-movement habitat between the two areas of the Angeles National Forest (San Gabriel and Sierra Pelona Mountains) within the Santa Clara River Watershed. This corridor is recognized by the Department and other resource agencies, state and local conservancies, conservation organizations, and citizens within the County and the City of Santa Clarita as having a high priority for conservation. The corridor is considered an Area of Conservation Emphasis by the Department for wildlife movement and its juniper woodland habitat components.

In 2006, The Nature Conservancy published their *Santa Clara River Upper Watershed Conservation Plan* (Plan) following extensive collaboration with a multitude of conservation groups, conservancies, and federal, state, and local agencies. The Plan's executive summary states:

"The upper watershed of the Santa Clara River encompasses an area of great biological richness. Those values, however, are increasingly threatened by the conversion of habitat to human land uses that are incompatible with biodiversity conservation, as well as by invasive species and altered fire regimes. The intent of this conservation plan is to focus collaborative, strategic conservation action to abate the main threats to — and enhance the viability of — the watershed's unique natural heritage. Guided by The Nature Conservancy's conservation planning framework and the collective expertise of numerous stakeholders, this conservation

plan highlights the ecological assets, or conservation targets, of the upper watershed. It analyzes land uses, conditions and activities that threaten the viability of the targets. Based on the analysis of targets and threats, the plan identifies strategies that can be undertaken by partners and stakeholders of the watershed to enhance the viability of the conservation targets as well as to abate the threats to them. Success in achieving the goals of this plan will be measured against short- and long-term benchmarks." Appendix D, Page D1 of the document describes Acton as a "Conservation Focus Area" and states Acton is:

"A mosaic of desert communities, dominated by desert buckwheat and California juniper, covers roughly 30 percent of the focus area. The desert communities are located in the northern portion in an area with little public ownership. Primary threats are incompatible development, increased fire frequency, and fragmentation. Protection of the transition zone between the desert, coastal, and montane communities is critical for maintaining large-scale ecological processes."

To illustrate further, the Department conducted an informal audit of Los Angeles County Department of Regional Planning (LACDRP) publically noticed CEQA documents reviewed by the Department for proposed projects within the town of Acton between the years 2001-2005. Thirteen projects totaling approximately 642 acres were tallied, all of which were described as supporting juniper woodland. It is likely that additional losses of juniper woodland have occurred at project sites deemed exempt by the County during this same timeframe. The Department is concerned that the continued incremental and cumulative impacts of these projects on biological resources may become significant and result in the degradation of the quality of the environment and associated habitat for fish and wildlife species.

The Department recommends LACDRP track the loss of acreage for juniper woodland, Joshua tree woodland, or other native vegetative communities. Establishing a baseline for native habitat and tracking habitat loss and preservation would be an important planning tool for LACDRP during CEQA planning and project review. The lack of habitat data makes it difficult to assess impacts, make informed decisions, and devise strategies for preservation of biological resources within these areas.

The Department recommends that an analysis be included for each project submitted to the LACDRP that proposes to impact juniper woodland, Joshua tree woodland, and other native vegetative communities. In addition the Department requests that the Los Angeles County General Plan update include a provision for recognizing juniper woodland, Joshua tree woodlands and other declining native vegetative communities as warranting further impact-analysis effort and establishing mechanisms to preserve and protect these communities from further degradation and local and/or regional extirpation.

The Department recommends requiring all biological studies, for the purpose of CEQA, utilize the vegetation classification system found in The Second Edition of a *Manual of California Vegetation*, which provides a standardized, systematic classification and description of vegetation in the State. This classification system has been the State standard since 2009 and would enable LACDRP to make a meaningful assessment and informed decision regarding future projects.

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Finally, the Department is available to meet with the LACDRP to discuss conservation efforts within the County of Los Angeles. Thank you for your consideration in this matter. Please contact Mr. Scott Harris, Environmental Scientist, at (626) 797-3170 if you should have any questions.

Sincerely,



Edmund Pert
Regional Manager
South Coast Region

cc: Ms. Betty Courtney, CDFW, Santa Clarita
Ms. Erinn Wilson, CDFW, Los Alamitos
Ms. Kelly Schmoker, CDFW, Laguna Niguel
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