

# California Native Plant Society

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RE: Ahmanson Ranch project FSEIR

Dear Sirs:

On behalf of the California Native Plant Society (CNPS), the staff Vegetation Ecologist Julie Evens has reviewed the Final Supplemental Environmental Impact Report (FSEIR) for the Ahmanson Ranch Phase "A" development project. Julie's critique of the FSEIR and comments regarding the Biological Resources section of this FSEIR are below.

The Ahmanson Ranch project FSEIR uses an outdated and inadequate classification for mapping of vegetation communities. The FSEIR specifically states that plant communities were based on the old Holland (1986) system as well as the current Sawyer and Keeler-Wolf (1995, *A Manual of California Vegetation*) system. However, it only lists plant communities known to the outmoded Holland system of classification. The FSEIR does not adequately classify and map the plant communities within the current *A Manual of California Vegetation* system. This current system is recognized by the CNPS, California Department of Fish and Game (CDFG), California State Parks, the U.S. National Park Service, and other state and federal agencies as the standard for project-level efforts. When producing a project-level vegetation classification and map, it is recommended that the finest levels of the classification hierarchy be used to map and describe the area. These finest levels are alliances (or series) and associations, as recognized by CNPS in *A Manual of California Vegetation* and by the CDFG in the California Natural Diversity Database.

For example, the general Venturan Coastal Sage Scrub habitat can easily be classified and mapped as a variety of different alliances and associations. This generic habitat type applies to



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many combinations of species in coastal scrublands from Santa Barbara, Ventura and Los Angeles County, and these specific types need recognition in smaller projects such as the Ahmanson Ranch FSEIR. A current vegetation classification and mapping project for the Santa Monica Mountains is occurring, in which the National Park Service and CDFG have preliminarily defined many different types of vegetation that fall under the simplistic Venturan Coastal Sage Scrub habitat. These can vary divergently in dominance of species, which may include *Artemisia californica*, *Eriogonum cinereum*, *E. fasciculatum*, *Hazardia squarrosa*, *Malacothamnus fasciculatus*, *Malosma laurina*, *Mimulus aurantiacus*, *Rhus integrifolia*, *Salvia apiana*, *S. leucophylla*, *S. mellifera*, and *Toxicodendron diversilobum*. Another example is of Chamise/Mixed Chaparral, which varies in dominance and alliance by one or more of the following shrubs: *Adenostoma fasciculata*, *Ceanothus crassifolius*, *C. oliganthus*, *C. megacarpus*, *C. spinosus*, *Cercocarpus betuloides*, *Heteromeles arbutifolia*, and *Quercus berberidifolia*.

Further, it is stated in the FSEIR that the Oak Woodland and Grassland vegetation types are further defined as multiple distinct habitats with their own acreage totals. However, the FSEIR only shows one acreage amount for the Oak Woodland types. Also, the Grasslands habitats could be split into more types than is given in the FSEIR, as based on the current classification system.

In general, all of the habitat types or vegetation communities listed in the FSEIR should be revised based on more detailed classification and mapping, as it is likely that the types at Ahmanson could be considered rare and localized. It is surprising that only very general habitats were presented in the FSEIR. Since the consultants who worked on the EIR spent over 3000 hours, a finer scale classification and map would be expected for this Ahmanson project. My recommendation would be as follows: A more accurate and specific vegetation classification and map should commence on the Ahmanson Ranch area to accurately document and confirm all the vegetation communities, and to identify the specific types of rare vegetation and where they may be impacted. The species composition of the local vegetation should be indicated by the dominant or characteristic components, not just the generic habitat or community type.

Sincerely,

Julie Evens  
Senior Vegetation Ecologist