

**California Audubon Society
dba San Fernando Valley Audubon Society (SFVAS)
Comments on September 2006 draft Sepulveda Dam Master Plan
October 6, 2026**

Thank you for providing stakeholders with an opportunity to comment on the revised Sepulveda Dam Master Plan (the Plan). SFVAS has been continually involved with matters in the Sepulveda Basin for over fifty years and has been a major conservation presence in the San Fernando Valley and beyond since 1906! Our comments on the basin follow, starting with the most consequential issues.

Environmentally Sensitive Areas (ESA) vs Wildlife Management (WM) Classifications: We understand that reclassifying certain areas from ESA to WM accomplishes several goals, including easier removal of encampments and conforming to certain actual uses such as inclusion of viewing areas and designated pathways. However, we are very concerned and need a guarantee that any reclassifications will not result in any wildlife protections being stripped away. Integral to that is classifying the entire Sepulveda Basin Wildlife Reserve (SBWR) as a Wildlife Management area.

A critical error in the draft plan has been made in reclassifying a portion of the SBWR formerly-ESA land to High Density Recreation rather than to Wildlife Management. Details follow.

The Sepulveda Basin Wildlife Reserve (SBWR):

From page 2-32 of the draft plan:

“Beyond preservation, SFCB (Sepulveda Flood Control Basin) offers rich interpretive opportunities including the Dam’s flood control function, the unique ecological value of the Sepulveda Basin Wildlife Reserve (a significant urban bird sanctuary), the history of the area, and the recreational opportunities available. Interpretive methods such as signage, guided nature walks, and online resources, can educate visitors and foster appreciation for this unique intersection of engineering, ecology, and recreation.”

SFVAS was instrumental in the design of the SBWR and has continuously led educational, preservation and habitat restoration efforts individually and in collaboration with the Sepulveda Basin Wildlife Areas Steering Committee. It is indeed a significant urban bird sanctuary and as such requires that it be protected. The 2011 Sepulveda Dam Master Plan classified the entire SBWR as ESA - see Figure 1. Most of the SBWR that was classed as ESA in the 2011 Plan is now classed as Wildlife Management (WM). We strongly object to one significant exception. A 12 acre portion of the SBWR, including the riparian tract along Haskell Creek south of Wildlife Way has been reclassified to High Density Recreation. The illustrations at the end of these comments show the location.

This reclassification is totally inappropriate and SFVAS strongly requests that it be changed to Wildlife Management:

That area has been considered part of the SBWR since 1988, when the Wildlife Reserve was expanded to include this area and the area between Haskell Creek and Woodley Avenue, and the restroom and storage buildings and small amphitheater were built, with a parking lot with plantings of native trees to serve them. Included in the project were new pedestrian bridges across Haskell Creek and improved viewing areas and pathways. Haskell creek was improved and more native plantings and informational signs were added.

1. The excluded area of Haskell Creek contains riparian habitat with many nesting birds including Least Bell's Vireos.
2. The buildings, amphitheater, and lot were built to support maintenance and operation of the wildlife reserve and to enhance educational programs there.
3. Page 5-24 of the Plan states: "The wildlife area covers an area of 130 acres located in the northeastern portion of the SFCB..." If the erroneously reclassified area is not reclassified correctly, nearly 12 acres of that area are excluded from Wildlife Management in the SBWR.
4. Page 5-24 also states: "The [wildlife] area also has an educational staging area and amphitheater, pathways with signage and viewing areas, and Haskell Creek has been reconfigured and re-vegetated" as referred to in item 2.

To protect wildlife, the excluded area should not be used for any recreational activities other than quiet enjoyment - no bouncy houses, loud music, huge parties, fires, bright lights, etc. as in the entire SBWR.

OTHER COMMENTS:

Page 1-3: "This revision of the Master Plan is intended to reflect current ecological, socio-demographic, and outdoor recreation trends that are impacting the lake, as well as those anticipated to occur within the next 25 years". We think it should say SFCB rather than lake.

2.7.2 Fish and Wildlife Resources page 2-18:

The statement that over 120 species of birds have been documented within the SCFB is an understatement - 308 species have been confirmed according to eBird :

<https://ebird.org/hotspot/L1470924> Table 2-3 Common Bird Species Potentially Occurring at the SFCB Project Area is puzzling because some of the species are uncommon and two have not been seen in the SFCB in recent decades, while the list is woefully short.

Page 2-21: A vegetation survey update would be helpful. For example, Black mustard (*Brassica nigra*) is very rare in the SCFB, being replaced by *Hirschfeldia incana* and *Rapistrum rugosum*. Significant restoration efforts are underway that would be helped by accurate information.

Page 2-27: We have now effectively used goats to reduce the amount of invasive grasses and mustards. They should be included as a tool and thank you to the USACE for allowing

the graze. The project was in and adjacent to the Apollo XI Model Airplane Field, which was considered part of the SBWR between 1988 and 2010.

Page 2-31 - Health and Safety: The section on local law enforcement is totally inaccurate and outdated - it reads:

“Law enforcement at the recreation amenities within the SFCB is provided by the City of Los Angeles, Department of General Services Office of Public Safety. General Services Park Rangers, backed by the Los Angeles Police Department in Van Nuys, are dedicated exclusively to patrolling the city’s parks, beaches, libraries and other city amenities. Typical criminal activity includes but is not limited to: trespass, transient camps, property crime, vandalism, gang activity, alcohol use, unauthorized dumping, and firearm use (USACE 2011).

“The SFCB’s naturally vegetated areas are susceptible to wildfire. These fires are often caused by transient encampments or are a criminal response to attempted enforcement actions against such encampments. Fire protection and EMT services are provided by the Los Angeles Fire Department, Fire Station 39...”

Suggested correction:

Law enforcement within most of the SFCB is provided by the City of Los Angeles Department of Recreation and Parks unarmed Park Rangers, backed by the Los Angeles City Police Department. Armed rangers from the Mountains Recreation and Conservation Authority and California Department of Fish and Wildlife also provide enforcement in some areas including portions of the Los Angeles River and ponds. Typical criminal activity includes but is not limited to: trespass, transient camps, property crime, vandalism, assault, gang activity, alcohol and drug use, unauthorized dumping, unauthorized bicycle and motor vehicle use, street takeovers, illegal fireworks, fishing and firearm use.

The SFCB’s naturally vegetated areas are susceptible to wildfire. These fires are often caused by transient encampments or are a criminal response to attempted enforcement actions against such encampments or are from arson or other illegal activities. Fire protection and EMT services are provided by the Los Angeles City Fire Department, often Fire Stations 88, 83, 39 and 100. Emergency Room and Hospital Services are found at Valley Presbyterian Hospital in Van Nuys approximately 1 mile east

Page 2-32: “The Wildlife Area in the eastern and southeast portion of the SFCB include an expanse of scrub vegetation west of Woodley Avenue, south of Burbank Boulevard... We think you mean Operations Area, but we would be glad to consider it Reserve as it was originally designated in 1979.

Page 2-32: Restoration efforts at Bull Creek have significantly improved the habitat, although the aesthetic results have been less successful due to homeless encampments and poor engineering leading to major erosion. The area now provides important habitat for Least Bell’s Vireos.

Page 2-5- and Figure 2-14 Managing Agency at SFCB Bain (sic): The City Recreation and Parks Department has not leased the area South of Burbank Blvd., east of the Hjelte Sports Fields since approximately 2009. The agricultural lease areas are missing from the map.

Page 5-1: Please clarify that casual use including bird walks and surveys, plant surveys, etc. will still be allowed in operations areas other than close to the dam gates?

Page 5-25: The Bull Creek interpretive nodes have been gone for years due to vandalism and unfortunate placement locations.

Page 5-26: Please share USACE Vegetation management plans!

Map page A-27 and Map 26: Critical Habitat for Least Bell's Vireo (LBVI) - the map is misleading at best. There are almost certainly no LBVIs in the area indicated, but they are nesting in virtually every riparian area of the SCFB. We question using the CNDDDB data for the purpose of showing nesting locations. We would be glad to follow up but estimate at least 20 nesting sites yearly in various areas of the basin.

A general comment - do you expect this plan will allow for a revised Vegetation Management plan for the Operations area south of Burbank Blvd.? Over time and due to repeated fires, it has type-converted into a virtual desert of flashy fuels which is not addressed adequately by the current plan. We would all love to see the formerly vibrant habitat there restored, and the fire danger addressed.

Concluding our remarks, it is essential that the proposed misclassification of the land use of a portion of the SBWR will be corrected. We hope the other comments can help make the Plan a relevant and useful blueprint for the next generation. Thank you for your consideration.



Figure 1. Sepulveda Dam Basin Proposed Land Use Classification from 2011 Sepulveda Dam Master Plan, correctly showing the ESA defined area for the SBWR



Figure 2. Portion of Map Page A-14 from draft 2026 Master Plan showing area erroneously classified as high Density Recreation outlined in red

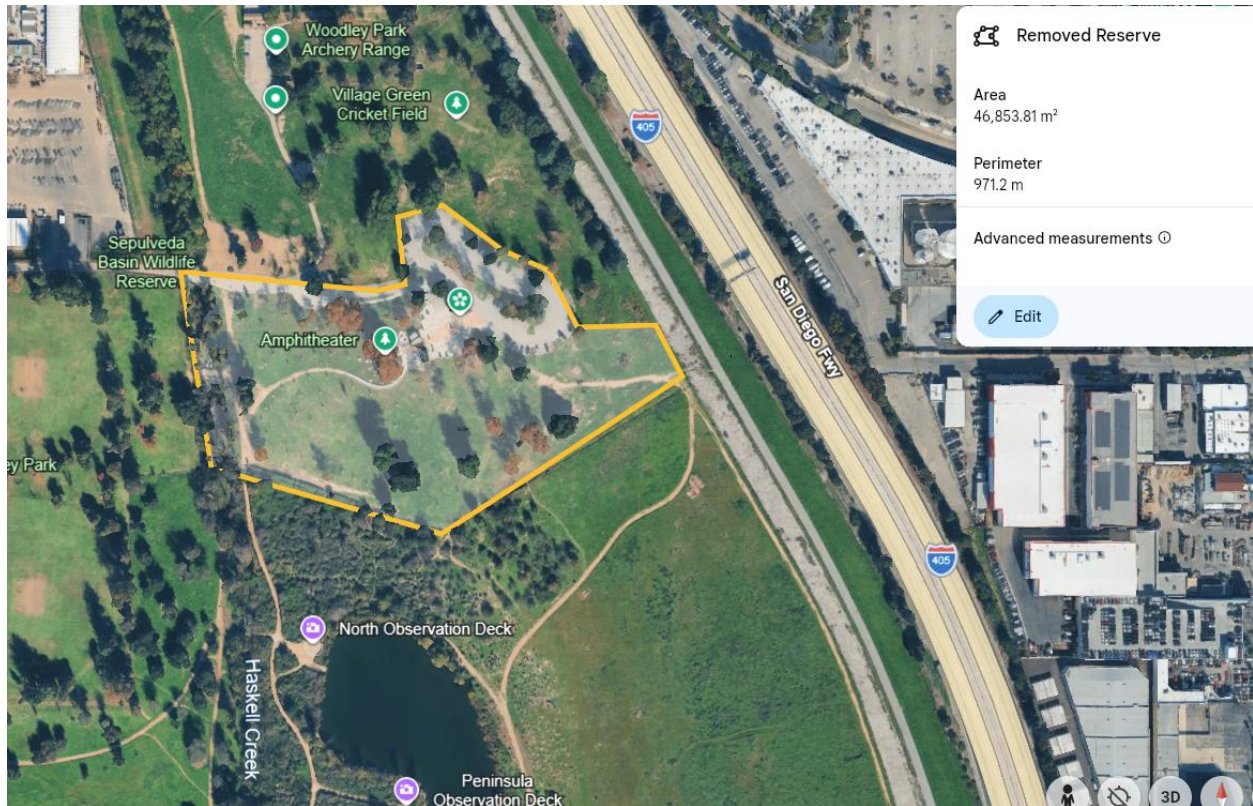


Figure 3. Detail of misclassified area approximately 11 acres.