



## California Native Plant Society

ORANGE COUNTY CHAPTER

P.O. Box 54891

Irvine, CA 92619-4891

occnps.org

February 2, 2017

The California Native Plant Society is a statewide 501(c)(3) non-profit organization, headquartered in Sacramento. It currently has 9,000 members in 34 Chapters. Membership is open to all.

CNPS is dedicated to celebrating California's native plant heritage and preserving it for future generations.

[cnps.org](http://cnps.org)

Incorporation ID:  
495829

The Orange County Chapter of CNPS focuses that dedication on the native plants and natural vegetation of Orange County and adjacent Southern California.

[occnps.org](http://occnps.org)

P.O. Box 54891  
Irvine CA  
92619-4891

Tom Barnes, ESA  
626 Wilshire Boulevard Suite 1100  
Los Angeles, CA 90017

RE: NOP for Phase 1 of San Juan Watershed Project

Dear Mr. Barnes:

The Orange County Chapter of the California Native Plant Society has always had a strong interest in the ecological functioning of the San Juan Watershed. As you know, the watershed drains much of the southwesterly slope of the Santa Ana Mountains and the foothills and coastal plain of southerly Orange County. Its upper reaches still retain much of their natural ecological functioning, thanks to being protected within the Trabuco District, Cleveland National Forest, and O'Neill, Reilly and Caspers Wilderness Parks. OCCNPS would like to see the lower reaches, now straitjacketed in concrete, returned to at least some natural ecological functioning as part of the Watershed Project.

OCCNPS would like the DEIR to study ways of incorporating native riparian vegetation into the inflatable-dam installations. We understand that, under long-time flood-control protocols, the main channel must be kept vegetation-free, year-round, in preparation for the occasional large rain event's few hours of high runoff. We wonder if some of the trapezoidal channel's concrete sides could be replaced with gabions, in which suitable low-stature natives could be planted. We can supply a plant palette. Such plantings would be placed above the average level of storm runoff, so not block flow up to that level. But they would provide year-round habitat for a wide variety of native fauna, thus return some ecological functioning to what is now a sterile concrete-scape.

Thank you for the opportunity to comment on this issue.

Respectfully,

Celia Kutcher  
Conservation Chair