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23 February 2001

Carl Thelander
BioResource Consultants
P.O. Box 1539
Ojai, CA 93024

Subject: Additional Comments on PM-4932 Nello Olivo Amended Biological Resources Report

Dear Carl:

David Magney Environmental Consulting (DMEC) on behalf of BioResource Consultants, has reviewed Kiva Biological Consulting's amended "Biotic Survey for a Proposed 80 Acre Subdivision Near Lockwood Valley, Ventura County, California", dated 25 January 2001. DMEC is providing additional comments on the botanical resources aspect of Kiva's report.

As part of a detailed examination of the "Vascular Plant List for Nello Olivo Property, Lockwood Valley, Ventura County, California", in relation to my work on the flora of Ventura County, I found that numerous plant species of local concern are reported to occur onsite; however, no indication, or map(s) of their occurrence onsite or distribution, or sensitivity is found in the aforementioned report.

A full 30 additional species of local concern are reported to occur onsite than identified as such in the report; however, no mention of their rarity is provided, or measures to mitigate potential impacts to them. I compared the Kiva plant list to my manuscript on the flora of Ventura County, and the Ventura County Plant Species of Local Concern to determine which species are rare or of scientific significance. Several taxa identified by Kiva have not previously been reported for Ventura County; however, some of these taxa could in fact occur here, and I am not questioning this. On the other hand, their presence on the project site represents the first reported occurrence of these taxa in Ventura County, and represent range extensions or disjunct relictual populations for them. These plants include:

- *Arabis pulchra* var. *gracilis*;
- *Collinsia parryi*.
- *Cryptantha mohavensis*;
- *Erigeron breweri* ssp. *covillei*;
- *Eriogonum nudum* var. *nudum* (This variety is not known from Ventura County, occurring further north; however, the three varieties of *E. nudum* known here are all rare in the county);
- *Eriogonum umbellatum* var. *subaridum*;
- *Sphaeralcea ambigua* (I seriously doubt this taxon occurs in Ventura County, likely it is a species of *Sidalcea*, of which all *Sidalcea* taxa are rare in Ventura County);

Other plants reported by Kiva as occurring on the project site that the California Native Plant Society considers to be species of local concern in Ventura County (with ten or fewer populations) include:

- *Ceanothus greggii* var. *vestitus*;
- *Chenopodium fremontii*;
- *Collomia grandiflora*;
- *Elymus elymoides* var. *elymoides*;
- *Elymus glaucus*;
- *Eriastrum sparsiflorum*;
- *Lessingia glandulifera* var. *glandulifera*;
- *Leymus triticoides*;
- *Malacothamnus fremontii*;
- *Melica stricta* var. *stricta*;
- *Mimulus bigelovii*;
- *Mimulus pilosus*;
- *Muhlenbergia rigens*;
- *Oenothera californica* var. *californica*;
- *Pectocarya setosa*;
- *Pediomelum californicum*;
- *Penstemon rostriflorus*;
- *Phacelia curvipes*;
- *Phacelia ramosissima* var. *ramosissima*;
- *Phlox gracilis*;
- *Plagiobothrys nothofulvus*;
- *Prunus virginiana* var. *demissa*;
- *Triteleia*;
- *Vicia americana*;
- *Viola purpurea* ssp. *mohavensis*; and
- *Vulpia microstachys* var. *microstachys*.

Based on these, and those appropriately identified as such in the Kiva report, the project site contains approximately 43 special-status plant species, which is an extremely high number for such a small site (83 acres).

As mentioned previously, the locations for all special-status species need to be described and mapped before an adequate impact assessment, and feasible mitigation measures, can be performed for this project. Several plant species identities are still undetermined, yet they may also be special-status species.

There are a few errors on the plant list that should be corrected:

- *Asclepias eriopoda* should be spelled *eriocarpa*;
- *Madia minima* is now called *Hemizonella minima*;

- *Loniceras* should be spelled *Lonicera*;
- *Hordeum leporinum* is *Hordeum murinum* ssp. *leporinum*;
- *Phorodendron* should be spelled *Phoradendron*.

Voucher collection numbers should be included on the list of plants observed (and collected) to allow reviewers to examine the supporting voucher when identification may be questioned, as recommended by California Botanical Society and California Native Plant Society policies.

In conclusion, either this project site is extremely important botanically (because it supports such a large number of special-status species) or the identifications of most of these taxa are incorrect. While I suspect the identification of some taxa are incorrect, I do believe that most of them are indeed correct. This leads me to conclude that the property is highly important botanically, and measures should be taken to protect these resources to the greatest extent possible.

Please call me if you have any questions regarding this letter.

Sincerely,



David L. Magney
President