

Appendix K-2

Biologist Email

From: Jackie Worden <Jacqueline.Worden@swca.com>

Date: Friday, May 26, 2023 at 12:46 PM

To: Stacie Henderson <stacie@ceqa-nepa.com>

Cc: Robert MacAller <Robert.MacAller@swca.com>, Rafaella Lisboa
<Rafaella.Lisboa@swca.com>

Subject: The Barry Building - 11973 San Vicente Blvd. Los Angeles, CA - Cycad questions

Hello, Stacie-

I have reviewed the attached arborist letter regarding the cycad plants at the subject property.

Cycads are not native to California and are not protected by California native plant protection laws, the California Endangered Species Act (CESA), or addressed by the Appendix G questions in CEQA (thresholds of significance) which specifically refer to native plants. Although cycads are protected under international laws, those also refer to wild, not cultivated cycads.

Best regards,

Jackie

Jacqueline Bowland Worden | she/her
Lead Biologist/Natural Resources Project Manager

My normal business hours are 7:00 am to 4:00 pm

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May 19, 2023

Stacie Henderson
Senior Project Manager
CAJA Environmental Services, LLC
9410 Topanga Canyon Blvd., Suite 101
Chatsworth, CA 91311

Re: The Barry Building – 11973 San Vicente Boulevard, Los Angeles, California 90049

Dear Ms. Henderson,

This letter is written in response to Comment No. B2-35 regarding four cycads located in the courtyard of the Barry Building at 11973 San Vicente Boulevard in Los Angeles, California. I evaluated and identified these plants on May 18, 2023. Their descriptions, conservation status, and photographs of their form and size can be found on pp. 4-6 of this letter.

Please feel welcome to call our office if you have any questions or if we can be of further assistance.

Very truly yours,

Cy Carlberg, Registered Consulting Arborist
Principal, Carlberg Associates



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Comment No. B2-35

“IMPROPER ANALYSIS AND CONCLUSIONS REGARDING POTENTIAL ADVERSE IMPACTS ON BIOLOGICAL RESOURCES

The Initial Study made the unsupported conclusion regarding subsection (a) of the potential thresholds of significance for Biological Resources as follows:

No Impact. The Project Site is located in an urbanized area and is currently developed with a commercial building and an associated surface parking lot. Landscaping is limited with four onsite palms and several raised bed planters. Due to the developed nature of the Site, and lack of any natural open spaces, species likely to occur on-site are limited to small terrestrial animals. Therefore the Project would not have a substantial adverse effect, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, no impact would occur and no further analysis of this topic in the EIR is required.

There is no demonstrated expertise or indeed any evidence to support this conclusion. However, there is substantial evidence to support a fair argument that this conclusion is incorrect.

The undersigned has been collecting cycads for approximately 25 years. The undersigned owns and is currently cultivating more than 40 different species of cycas. The undersigned possess sufficient expertise to state that the photographs of the courtyard depict at least two different and unidentified species of cycas. Because little emphasis was placed on the plants growing in the courtyard in the decision regarding the subject matter of the photographs, it is impossible to identify the exact species or determine whether there exist more than the 2 different species at the site. The removal of these plants has the potential to cause a substantial impact on *species identified as a candidate, sensitive, or special status species* as contemplated by CEQA.

The periodical, the *Annals of Botany*,

(<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4242375/>) states:

Cycads represent a very primitive group of vascular plants that have been in existence for more than 200 million years (Hendricks, 1987). Their origins can be dated to the low Permian (Zhifeng and Thomas, 1989), they were most diverse and widely dispersed in the Mesozoic era, and they were important components in the vegetation of the Triassic and Jurassic. Since then, they have been in decline and today they have only a relict distribution in tropical and subtropical regions. Field studies have shown that the majority of wild cycad populations are either threatened, critically endangered, or on the brink of extinction (Osborne, 1995). All species of cycads have been listed in the Convention on International Trade in Endangered Species of Wild Fauna and Flora.



Plants rarely make it to the list. Consequently, many plant species are rapidly disappearing, largely under the radar of public attention. Some scientists have dedicated their lives to studying plants, including ancient, rare ones that are quickly heading towards extinction. Nathalie Nagalingum, currently an Associate Curator and McAllister Chair of Botany at the California Academy of Sciences in San Francisco, is one of them.

Most of Nagalingum's recent research focuses on cycads, palm-like plants with stout trunks and a crown of lush, stiff leaves. Cycads are believed to be the world's oldest seed bearing plants, some dating back almost 300 million years. This makes them as old (or even older) than dinosaurs, according to Nagalingum.

This ancient group of plants is also heavily sought after by collectors, frequently falling prey to poachers. In 2014, for instance, thieves reportedly stole 24 cycads — 22 of which are listed as critically endangered on the IUCN Red list — from the Kirstenbosch National Botanical Garden in Cape Town, South Africa.

Cycads are also threatened by deforestation and clearing of land for agriculture or urban sprawl. In fact, of the 300-odd recognized species of cycads today, about two-thirds are seriously threatened by extinction, she said. Many cycad species have now been reduced to a handful of specimens in botanic gardens.

Nathalie Nagalingum:

I started my career as a paleobotanist (a botanist who studies fossil plants), and several years later became fascinated with cycads because they are ancient plants that co-existed with dinosaurs. In fact they are the oldest seed-plant group that exist today; on the other hand, many of their seed-bearing cousins became extinct. Cycads have been on earth for hundreds of millions of years. . . most cycads are very rare, and two-thirds are officially listed on the IUCN Red List of Threatened Species. A few species are so rare that they are now designated as "extinct in the wild"; this means that they are only known from plants growing in botanic gardens and collections. Cycads are more endangered than any other group of plants or animals on Earth. One of the threats is from deforestation and land clearing. While in the field collecting cycads for my research, I've witnessed first-hand the destruction of cycads for urban development, and I have also searched fruitlessly for cycads in areas that have been transformed into agricultural land. The other major threat is from poaching—cycads grow really slowly, so rather than waiting for a seed to grow, older mature plants are stolen for gardens. These two threats, combined with their biology, have made cycads highly endangered.

The history of the use of the subject property supports the need for further inquiry on this topic. As described above, decades ago a tenant was a purveyor of rare plants including palms and other similar plants. It is possible that the plants that are observable in the photos provided in the DEIR, and perhaps others that are not shown, include rare and or endangered and protected species of cycads.

At a minimum, this issue requires further evaluation from an expert with knowledge of cycas to inform the public and the decisions makers or any impact on these plants all of which have been listed in the Convention on International Trade in Endangered Species of Wild Fauna and Flora."



Response to Comment No. B2-35

Cardboard cycad (*Zamia furfuracea*) Quantity: 1

Conservation status:

Global Status: GNR (Global Rank Not Yet Assessed)¹

United States Status: NNA (N/A)

U. S. Endangered Species Act: None

Committee on the Status of Endangered Wildlife in Canada (COSEWIC): None

Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES): Endangered



Zamia furfuracea (cardboard fern) is endemic to the Gulf of Mexico where it grows on sandy limestone cliffs of coastal mountains. It can reach 1.5m in height and produces stiff, arching fronds bearing up to 13 opposite, but uneven leaflets which have a coarse texture resembling cardboard. The newly emerging fronds are covered in fine golden hairs and give rise to the specific name *furfuracea*, which means scruffy or mealy. Female plants will produce erect cones which require fertilization by pollen from male cones borne on separate plants.²



¹ Nature Serve Explorer, https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.885222/Zamia_furfuracea, accessed May 19, 2023

² Cambridge University Botanic Garden, <https://www.botanic.cam.ac.uk/the-garden/plant-list/zamia-furfuracea/>, accessed May 19, 2023



Sago palm (*Cycas revoluta*) Quantity: 3

Conservation status:

Global Status: GNR (Global Rank Not Yet Assessed)³

United States Status: NNA (N/A)

U. S. Endangered Species Act: None

Committee on the Status of Endangered Wildlife in Canada (COSEWIC): None

Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES): Appendix II (species that are not necessarily now threatened with extinction but that may become so unless trade is closely controlled)



Sago palm (facing northwest)

centre of the plant.⁴

The sago palm (*Cycas revoluta*) is native to southern Japan and the Ryukyu Islands. It is one of several species used for the production of sago and is also an ornamental plant. The sago cycad can be distinguished by a thick coat of fibers on its trunk. The sago cycad is sometimes mistakenly thought to be a palm, although the only similarity between the two is that they look similar and both produce seeds. The leaves grow from the trunk and start out as small leaves near the



Same sago palm (facing east)

³ Nature Serve Explorer, https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.160961/Cycas_revoluta, accessed May 19, 2023

⁴ Wikipedia, https://en.wikipedia.org/wiki/Cycas_revoluta, accessed May 19, 2023



