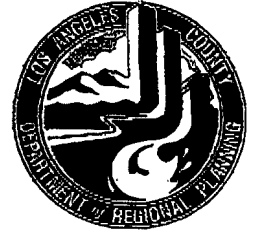




Los Angeles County  
Department of Regional Planning



Planning for the Challenges Ahead

December 3, 2002

James E. Hartl, AICP  
Director of Planning

Maya E. Zaitzevsky, Project Coordinator  
Department of City Planning  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

**RE: Request for comments on Draft Environmental Impact Report—Canyon Hills Project, SCH #2002091018**

Dear Maya Zaitzevsky,

Thank you for the opportunity to comment on the Canyon Hills project, a subdivision of approximately 887 acres into 280 residential lots on 194 acres, an equestrian park and 693 acres of open space.

We have reviewed the biological section of the Draft Environmental Impact Report (DEIR) and have some concerns as to the adequacy of the analysis to numerous sensitive resources found on the project site.

- 1. **General comment:** The proposed project will remove or disturb about 211 acres through grading, and an additional 90-plus acres through fuel modification, a portion of remarkably intact native vegetation within the Verdugo Hills, a regionally significant open space area within the City of Los Angeles. The chaparral on the western portion of the project site is one of the best stands of this vegetation type in Los Angeles County. The Verdugo Mountains (SEA No. 40) are designated a Significant Ecological Area in the Los Angeles County General Plan because of the excellent condition of the habitats within them and also because they help to form an ecological link between the Santa Monica and San Gabriel Mountains. The development of the proposed project will foster or facilitate the erosion of this unique resource, increasing its exposure to edge-effects of fire, invasive species, predation by pets, lighting, and noise, among others. This loss will be permanent and unmitigable and is therefore significant.

11-1

We recommend that the City of Los Angeles voluntarily seek a review of the project design by Los Angeles County's Significant Ecological Areas Technical Advisory Committee for an objective analysis of the impacts on biological resources by the proposed project.

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- 2. **Page IV.D-18:** Surveys were conducted during a low-rain year and are therefore not necessarily representative of the full biological diversity of the site. Sensitive plant surveys should be repeated following a normal precipitation season.

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- 3. **IV.D-46 and throughout:** *Cnemidophorus hyperythrus* does not occur in the project area; *C. tigris multiscutatus*, a sensitive reptile species, does occur in the

11-4

- region and may be expected on the project site. 11-4
4. **IV.D-49:** The disturbance of 304 acres does not pose a "potential" impact to biological resources. The impact will be obvious and real. 11-5
5. **Figure IV.D-4:** Non-native landscaping is proposed here and in the text. The planting palette should be reviewed to ensure that invasive plants are excluded. Also, irrigation of landscaping should be discouraged so as to delay the eventuality that Argentine ants and other invasive animal or plant species will be introduced to the area. 11-6
6. **Impacts to Vegetation Associations:** The preservation of acreage as "open space" does not reduce impacts except in the implication that development could have occurred there and one should be relieved that it will not. The impacts that will be incurred remain as real and as permanent in the space in which they occur, with or without the dedication of open space. Mitigation should consist of restoration of disturbed habitats within the conserved open space. 11-7
- The loss of southern willow scrub habitat is not addressed in Mitigation Measures D.1-1 to D.1-4 and should be considered a significant impact without any mitigation. 11-8
- Revegetation within detention basins is inadequate to replace the function of lost riparian habitats, as these basins will be subject to regular maintenance and substrate and vegetation removal. 11-9
7. **Page IV.D-64:** Section 3503 of the CDFG code applies to all native bird species, not just migratory species. 11-10
8. **IV.D-65:** The relevance of the Duke Project discussion is unclear. That smaller proposed project, in an area immediately adjacent to the Canyon Hills site was found to pose significant impacts; however, the Canyon Hills project is presumed not to, although the developed areas of Canyon Hills outsize the Duke project by nearly four times. Also, the occurrence of a fire on the Duke Project site, adjacent to an existing community, points to such an eventuality on the periphery of this site. 11-11  
11-12
9. **Native trees and wooded habitats:** Separate analyses are provided for wooded habitats (southern mixed riparian forest, southern coast live oak woodland and southern coast live oak riparian forest) and native trees (coast live oak and western sycamore). The two analyses are not complementary. In the discussion of sensitive habitats and Table IV.D-6, a total of 3.48 acres of wooded habitat is said to be permanently impacted by the proposed development. However, in the analysis of impacts to native trees, 232 oaks and 27 sycamores are said to be within proposed grading areas. It is difficult to imagine how 259 trees could fit on 3.48 acres. The tree maps (Figures IV.D-6 through 18) provide some clarification, as many, perhaps most, of the trees are found to lie outside of areas mapped as wooded habitat (Detail Maps S2, S3, N1, N2, N5, N6 and Figure IV.D-1). Either the distribution of wooded habitats should be reconsidered in the discussions of impacts to sensitive habitats 11-13

and Figure IV.D-1 revised accordingly, or better descriptions of resource values within the mixed chaparral communities should be given, and a portion of the "mixed chaparral" should be reclassified and considered sensitive. It is misleading to state that permanent impacts to shrub communities (mixed chaparral) will be insignificant if those "shrubs communities" contain an undisclosed substantially wooded component.

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The replacement of oaks trees by planting within maintained and landscaped areas is inadequate to replace the lost seed production, nesting opportunities and nearly every other habitat value provided by oak and sycamore trees in a natural setting. Habitat values are consequential inasmuch as there is an appropriate complement of species to utilize them. The other species involved in the oak and sycamore communities will not be present in a landscaped setting.

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10. IV.D-161: "Key locations" for wildlife movement are not clearly identified in the mitigation measure.

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Once again, our department thanks you for allowing us a chance to take part in this process. If you have any questions, please feel free to contact Joe Decruyenaere, Staff Biologist, at (213) 974-6461, Monday through Thursday from 7:30 a.m. to 6:00 p.m., or email him at [jdecruyenaere@planning.co.la.ca.us](mailto:jdecruyenaere@planning.co.la.ca.us). Our offices are closed on Fridays.

Very truly yours,

**DEPARTMENT OF REGIONAL PLANNING**

James E. Hartl, AICP  
Director of Planning



Joe Decruyenaere, Staff Biologist  
Impact Analysis

JEH:jd