

December 29, 2003

Candace Young  
 7136 Estepa Dr.  
 Tujunga, CA 91042

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

RE: Comments on Draft Environmental Impact Report no. ENV-2002-2481-EIR,  
 Canyon Hills Project

Dear Planning Commissioners,

I am limiting my comments to the wildlife corridor section of the DEIR. However, this is not to imply that other portions are adequate—they aren't. Living alongside a major wildlife corridor for the last 7 years makes me somewhat of an expert on this particular topic.

The project and its alternatives are environmentally insensitive. The wildlife corridor section of the environmental impact report has significant omissions and errors.

**In view of these significant and serious omissions and errors in the information contained in the draft environmental impact report (DEIR), the environmental impact report consultant should incorporate the suggestions for revision of the DEIR and re-circulate the DEIR for public comment. We ask for these revisions to be made and recirculation to be made under the California Environmental Quality Act (CEQA) Guideline Section 15088.5. The errors and omissions are of a significant nature that would require re-circulation under Section 15088.5.**

166-1

First let's talk about coyotes. I quote, *"It is difficult to determine the exact number of coyotes; however based upon documented home range sizes for coyote, it is expected that up to **five** coyotes would use the project site and Duke Property at any given time."* (IV.D-141) Please!! I have that many every 5 minutes walking the corridor behind my house in the evening. The report then goes on to contradict their own statement. For instance, *"GLA studies indicate that coyotes are still common in the Verdugo Mountains where areas of open space occur adjacent to residential development."* (IV.D-150) *"As depicted on Figure IV.D-21, coyotes are common within the project site..."* (IV.D-151)

166-2

What is most troubling to me is the report's total disregard for not only adequate wildlife corridors for coyotes, but more importantly, for human safety at the urban-wilderness intersection. *"Because of the high level of adaptability exhibited by the coyote and their ability to operate and thrive at the wildland/urban interface, the provision of a corridor for coyotes is unnecessary": IV.D-151* *"Coyotes and gray foxes, both of*

which were detected using this local movement path, (i.e. referring to the street being paved), would easily adapt to this change in the character of Verdugo Crestline Drive.” (IV.D.-154) So now our residential streets are supposed to be enhanced for coyote travel?! It gets more preposterous. D.3-5 “mitigation measure” (IV.D.-161) - “The project homeowners’ association(s) shall maintain openings in walls at key locations within the Development Areas to maintain local movement paths.” Breaks in walls in **between** houses are not a safe nor sufficient wildlife corridor. It appears the coyotes then have to cross a residential street in order to continue on their way on their “wildlife” corridor. (At drainage 4 corridor.) Hope the kids aren’t playing kick ball at the time....

166-2

Speaking of kids and coyotes, a few leisurely Saturday late mornings ago, as I sipped coffee while enjoying my canyon deck, there was a coyote with a live chicken in its mouth within my neighbor’s fenced back yard. Along with the chicken-thieving coyote, was a male adult, a 3 year old and 5 year old child, and 2 mid-size dogs. Yes coyotes adapt...all too well. A coyote unafraid of man is a dangerous thing. Do we really want to force them onto our streets and through holes in our walls only to become more “adapted” to man? Coyotes frequently try to attack my dog – a **chow** – through my chain link fence. They certainly are not afraid of me. When I come out to “shoo” them, my childhood comes back---Wiley Coyote’s snicker.

166-3

“Wiley coyote” reminds me of The Roadrunner. We have roadrunners here. I don’t see them mentioned in the “Flora and Fauna” main section of the DEIR. Why not? They frequently flee as I park my car...and perch on my deck railing as my indoor cats peer out trying to figure out what the devil they are. The roadrunner omission needs to be corrected.

166-4

Another area I have expertise on is the “Duke property”. We spent several years...as you know... addressing the problems with this proposed development. The Canyon Hills DEIR includes the Duke land in its assessment of the adequacy of wildlife corridors. Curiously, in figure IV.D.-4, the Duke land is included as part of the project itself. This is sloppy work to say the least. Are they planning on buying the land or not? This is reason enough to send the DEIR back for revision. Nevertheless, they include evaluation of the Duke land without the approved Duke housing development considered, i.e, as if it is undeveloped. Cumulative developmental impacts would include the impact of both parcels of land being developed. (In truth, the land may remain undeveloped if Santa Monica Conservancy’s purchase of the land is finalized. In which case, the Canyon Hills DEIR should evaluate the development’s impact on the open space park.)

166-5

However you look at it, the analysis of the cumulative impact with the Duke land is misleading. The DEIR makes it sound as if the Duke property abuts civilization, which it doesn’t. “*First, animals that exit the Duke Property to move east along La Tuna Canyon Road encounter heavily developed areas that begin at the intersection of Tujunga Canyon Blvd. and La tuna Canyon Rd.*” Yes, but there is a canyon after the Duke property and before Tujunga Canyon Blvd.! There is one major canyon that extends north for about a mile, and there are numerous connected steep canyons that extend up all the way to Tujunga Canyon Blvd. from La Tuna canyon that support wildlife. Throughout the

Canyon Hills DEIR these canyons next to Duke are ignored, despite clearly being seen on Figures IV.D-21. Why didn't the DEIR consider the land east and northeast of the Duke property line? It's not as if the topography and wildlife corridors stop at the arbitrary property line. If they did, they would have to consider the impact to the major Crystal View housing development. The canyon east of the Duke property, was not considered part of the "study area". (IV.D.-1270) "In addition to the focused surveys of the project site and Duke Property described above, other portions of the Study Area beyond the limits of the project site and Duke Property were carefully surveyed in the ways noted above for wildlife or their sign including (a) both sides of La Tuna Canyon Road (e.g., shoulders, pathways or walkways, etc.) west and east of Interstate 210..." (IV.-D.-135) "*Movement is possible to the east from the eastern edge of the project site along La Tuna Canyon Rd; however, as discussed above, this is essentially a "dead end" for any animals that move along La Tuna Canyon Rd. to the east from the project site or from the Duke Property.*" (IV.D.-145) The animals displaced, particularly during grading, are left in my "dead end" canyon.

166-5

This project is estimated to be built over a 5 year time span... *dependent upon local economic conditions* (III-4). The DEIR is remiss in not discussing impact to wildlife during this extended, and potentially never-ending, construction. As evidenced since the 1998 Duke area arson fire, the displaced animals have exponentially populated the canyon east of Duke and Canyon Hills. The creation of the road at the southwestern portion of my canyon further isolates the animals in this canyon. After 10 rattlesnakes in my yard per summer, coyotes too many to count, and severe rat infestations, I ask that you realize that the area East of the Duke property is not "cut-off" as the DEIR proclaims, but rather is teeming with life that we don't want cut-off from the Canyon Hills property. Nor do we want all this teeming life abiding in only 1 small canyon. Animal corridors need to connect between this canyon east of the Duke property and the Canyon Hills project. The DEIR needs to adequately study this particular canyon's ecological concerns and wildlife corridors with the project site. The DEIR needs to be revised and re-circulated after this oversight is corrected.

166-6

In general, the Canyon Hills Wildlife Movement Study appears to be inadequate because observations were not done over a wide enough area. Even within the Duke land, the Duke EIR, (EIR, No. 89-1163-SUB{ZC/GPA}, SCH No. 93021045), published in May of 1997, discusses more species and wildlife corridors than those found in the Canyon Hills DEIR. A thorough DEIR would have referenced the previous Duke Wildlife study, and discrepancies would be addressed. As a scientific document, the Wildlife study is lacking by not describing the number of days, amount of time, and time of day when observations were made. Without this information, it is impossible to assess the adequacy of the study, and it should be returned for correction.

166-7

Looking at Figure IV.D.-21, the development is surrounded by coyote scat. Remarkably, coyote scat doesn't appear to have been found within the proposed development site. Why did the biologists ignore the significance of wildlife trails on the project site? (Appendix, pg 291.) Further, why weren't there tracking stations at the most impacted part of the development? There needed to be tracking stations at drainage 4 and on the

166-8

Duke ridge for instance. In general, there were no tracking stations where one would expect to see the most wildlife. Extremely critical to the "missing link" would have been a tracking station to determine whether this is a remaining regional link to the San Gabriel mountains.

166-8

Signs of a mountain lion in the project area would indicate at least a tenuous link to the San Gabriel mountains. Several sources have reported recently seeing a mountain lion. One of my teenage clients told me he and his friends no longer go up to the cross at night like they often did, ever since they ran into a cougar one night. Having grown up in Tujunga and coming from a family who frequents wilderness areas, he knows what a cougar looks like. A 12 year old neighbor boy reports seeing a mountain lion one morning in the canyon, no more than a couple hundred feet from his house. Both of these sightings were on the northern side of the proposed Development Area A. A Burbank staff report dated 4/2/02 states, "*Deer overpopulation is always a concern to the California Department of Fish and Game because it draws mountain lions into the Verdugo mountains...*" Where are they drawn from, the suburbs? The possibility of a missing link is too important to have been inadequately investigated.

166-9

Deer are the mountain lions' main food source. "*Mule deer are only on the south side of La Tuna Canyon*" (IV.D.-27). Yet, Table IV.D.-17 lists mule deer detected at Crestline Dr. and along the firebreak road along the northern edge of the project site. Given that there apparently ARE some deer north of La Tuna Canyon, are the corridors adequate during and after construction, for deer, not just coyotes and raccoons?

166-10

Speaking of animals not found on the site, I was delighted to read that I no longer have to worry about the ground squirrels, rabbits, and gophers destroying my vegetable garden, nor snakes coming after rats in my yard. Yes, that's right! GLA biologists noted "very low occurrences or evidence" of these nuisance animals on either the project site or the Duke property. Amazing! They must all just be hanging out at my canyon's edge, waiting for the spring planting... Because the canyon has such few rabbits, gophers, etc., there isn't sufficient food source for the American badger. In addition, the report goes on to say the ground is too difficult to burrow. I don't know the extent of the numbers of badgers in the area, (I've seen only one), but the above arguments are laughable. I find burrows all over the canyon. Non-reporting of prevalent animals in the area points out the inadequacy of this report more than any other finding discussed thus far. This DEIR must be corrected and re-circulated.

166-11

The wildlife corridor report needs to state such details as the width of the corridors, (which should be at least 500 feet), how close to houses and streets they will be, etc. The public cannot make an educated assessment of the DEIR without such information. Please insist this information be added to the DEIR and returned to the public for review.

166-12

The cumulative impacts of other developments on wildlife corridors cannot be evaluated from this document. The area is studied without consideration of the Duke property being built upon. As mentioned earlier, the document is very hazy when it comes to what is to become of this parcel. Similarly, we don't know what other nearby land the

166-13

development company owns outright or has options on, which could be developed. This information needs disclosed in order to evaluate all potential cumulative impacts on wildlife corridors. (In the same vein, comparative projects listed are business developments on Foothill Blvd. The project should be compared to other projects in the La Tuna Canyon/210 scenic corridor. Cumulative effects need to be evaluated for all development in the Verdugo mountain area, whether in Tujunga or even outside the LA city limits.)

166-13

166-14

The Canyon Hills Project site is listed as **Environmentally Sensitive Area No. 40**. This document reflects a lack of genuine concern for the environmental needs of this special area. *“County SEA policies only apply to unincorporated areas within the County, while the project site is located entirely within the City. Therefore, the proposed project is not subject to any restrictions associated with SEA No. 40.”* (IV.D.-28) The DEIR needs to describe what the requirements would be in order to build in this area IF it were in the county rather than the city. One would suppose that if they were meeting the requirements they would have said so. This omission speaks volumes to the environmental damage potentially wreaked by this development. And yet, *“There would be no significant impact to regional or local wildlife movement....”* (IV.D.-153).

166-15

The wildlife movement study must be redone, correcting the mistakes noted in this letter. If this is not done, the EIR will continue to inaccurately report no significant impacts that cannot be mitigated. Thank you,

166-16

Sincerely,

  
Candace A. Young