



State of California - The Resources Agency

Arnold Schwarzenegger, Governor

DEPARTMENT OF PARKS AND RECREATION

Ruth Coleman, Director

Angeles District
1925 Las Virgenes Road
Calabasas, California, 91302

December 30, 2003

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CITY OF LOS ANGELES

DEC 31 2003

ENVIRONMENTAL
UNIT

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

Re: Canyon Hills Project, EIR Case No: ENV-2002-2481-EIR, SCH No. 2002091018

Dear Ms. Zaitzevsky:

The California Department of Parks and Recreation, Angeles District, has reviewed the DEIR for the above project. We are concerned about the adverse impacts the proposed project, as currently designed, will have on State Park Property in the Verdugo Mountains and on other public lands in the vicinity of the project. We offer the following comments on the project and on the DEIR.

The configuration of the project, with two clusters of housing north and south of the 210 Freeway will effectively cut off wildlife movement from the public lands of the Verdugo Mountains from the San Gabriel Mountains via the Tujunga Wash. The wildlife movement study performed for the DEIR clearly indicates that wildlife traverse the entire project area. The buildout of Area B will cause the Verdugo Mountains to become a habitat island. The open space preserved in the northwestern region of Area A will be cut off from the public lands in the Verdugo Mountains. The development footprint of Area A must be pulled back further to the north of the 210 Freeway. This will not only increase the usefulness of the open space for wildlife, but will also help to mitigate the impacts to scenic vistas on the 210 Freeway that will result from the project. Compaction of the proposed project will also lessen the impacts from the "edge effect" to adjoining habitat by reducing the amount of chaparral and coastal sage scrub that will be removed for fire protection purposes.

173-1

The DEIR is inadequate in that it does not present an alternative, as described above, that eliminates development in Area B and further clusters the project in Area A. This is clearly an environmentally superior alternative that addresses habitat loss, barriers to wildlife movement and impacts to scenic resources.

173-2

The analysis of visual impacts from the project is inadequate because it does not address impacts from the project on visitors to public parkland in the Verdugo Mountains. The project as proposed, particularly Area B, will have significant impacts on scenic vistas from these public lands and will degrade the experience of the visitors there.

173-3

Ms. Zaitzevsky
Canyon Hills Project
December 30, 2003
Page two

The wildlife studies performed for the DEIR are inadequate. Insufficient time was dedicated to the study of wildlife movement and to the detection of California Gnatcatchers on site. It is stated that the preservation of 662 acres adjoining the development site would offset the removal of habitat for sensitive species such as the San Diego coast horned lizard, the silvery legless lizard and orange-throated whiptail. The fact is that these species will lose habitat. Preservation of the remainder is not mitigation of this loss, particularly when the preserved open space habitat differs from the impacted areas and will be cut off from other open space by the configuration of Area A.

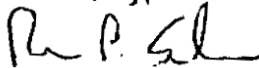
173-4

The proposed mitigation for the removal of the oak trees is inadequate because the proposed replacement trees will be located on street medians and around the proposed development site. This mitigation is not an appropriate exchange since the any habitat provided by individual oaks will be negated by people, cars and domesticated pets. The replacement oaks we be little more than landscaping and without connectivity to the other elements of oak woodland habitat, such as native shrubs and herbaceous vegetation, will not replace the value of the oak habitat that will be removed.

173-5

Thank you for the consideration of our comments.

Sincerely,



Ron Schafer
District Superintendent