



Shadow Hills Property Owners Association
Dedicated To Preserving Rural Community

December 8, 2003

Maya Zaitzevsky, Project Coordinator
 City of Los Angeles Dept. of City Planning
 200 North Spring Street, Room 763
 Los Angeles, California 90012

RECEIVED
 CITY OF LOS ANGELES
 DEC 11 2003
 ENVIRONMENTAL
 UNIT

Re: Canyon Hills Project
 ENV-2002-2481-EIR
 SCH No: 2002091018
 October 2003

Ms. Zaitzevsky,

We seriously question the program of native California Coast Live Oak and Western Sycamore tree loss mitigation on the Canyon Hills Project as proposed in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR"). The proposed plan to mitigate the loss of up to 232 native California Coast Live Oaks and 27 Western Sycamores (DEIR CD-rom Biology File under Summary section Native Trees) is as follows according to the DEIR (Table IV-D-16 and CD-rom Biology File under Summary section Native Trees):

1. Entry points: 15 California Coast Live Oaks, 60" to 36" boxes
2. Parks and Common Areas: 205 California Coast Live Oaks, 36" to 24" boxes
3. Road Right-of-ways: 515 California Coast Live Oaks, 24" boxes to 15 gal
4. Private Lots: 250 California Coast Live Oaks, 15 gal
5. Detention Basins: 60 California Coast Live Oaks, 15 gal, 5 gal and 1 gal
 90 Western Sycamores, 15 gal, 5 gal, and 1 gal
6. Slopes: 100 California Coast Live Oaks, 5 gal and 1 gal
7. Flood Control: 60 California Coast Live Oaks, 15 gal, 5 gal and 1 gal
 91 Western Sycamores, 15 gal, 5 gal and 1 gal
8. Fuel Modification Areas: 365 California Coast Live Oaks, 1 gal, seedlings and acorns
9. Proposed Equestrian Trail: 200 California Coast Live Oaks, seedlings and acorns
10. Damaged Riparian Habitat: 0

20-1

This certainly appears impressive at the outset when compared to the requirements of the LAMC Oak Tree Ordinance Section 46.02 (c)1 which requires the replacement of any oak approved for removal by at least two trees within the same property boundaries and that

P.O. Box 345 • Sunland, California 91041-0345

each replacement tree must be at least a 15-gal specimen. However, one quickly loses faith in the "magnanimous generosity" of Canyon Hills when one realizes that rather than following the intent of the Oak Tree Ordinance, the much larger boxes are quite self-serving as development show-case specimens at development entry points and common areas. What has happened to any effort to replace larger trees where the remaining wildlife could once again use it – the detention basin, the fuel modification areas and most especially as an effort to restore the riparian habitat areas? Without the protection of a "nurse tree", acorns, seedlings, 1-gal specimens and even 5-gal specimens will never survive. Canyon Hills might just as well save their money on this portion of the mitigation program. Larger trees are much needed in the fuel modification areas and most certainly in areas of redeveloping riparian habitats where they can not only provide a food source, but also provide nesting opportunities. To place seedlings and acorns along equestrian trails is ludicrous. Unseen small trees will succumb to compacted soil and trampling. Larger trees would have some chance of survival as horse and rider will see them and avoid them.

20-1

I question the authenticity of information provided by the DEIR. According to the CD-rom Biology File under Summary section Native Trees, the largest replacement Oak to be placed at entry points is to be 72" box specimens. According to Table IV-D-16, the largest replacement Oak to be placed at entry points is to be 60" box specimens. Well? Which is it? If such data is found to be inconsistent within the DEIR, how much other data not showing any obvious inconsistencies is in error?

20-2

I quote the DEIR from the CD-rom Biology File under Summary Section "Significance after Mitigation": "With implementation of the mitigation measures described above, the proposed project would not have any significant impacts on biological resources with the exception of native trees." I beg to differ. Destruction of Riparian and Woodland habitat, however "temporary", most certainly will have a significant impact on faunal biological resources dependant on native vegetation for food and nesting opportunities.

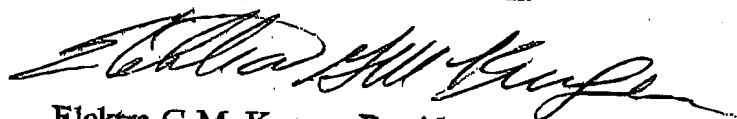
20-3

Further, the DEIR states that 211 acres of the Canyon Hills ownership affected by grading will never be re-vegetated. (DEIR CD-rom Biology File under Summary section Project Impacts). This too will unquestionably have a significant impact on all biological resources.

20-4

~~I quote from the DEIR CD-rom Biology File's Draft Tree Inventory and Impact Analysis~~
 7.6 Mitigation Plan: "All tree plantings would be subject to a 5-yr monitoring effort by an independent certified arborist. The monitoring effort would consider growth, health and condition of the subject trees in order to evaluate the projects success. This monitoring effort might result in recommendation of remedial actions should any of the tree plantings exhibit poor or declining health". This alone is too vague and requires greater detail eg what would constitute "remedial action" and a clearer definition of what state of growth, health and condition would trigger remedial action, not just "recommend" it.

20-5



Elektra G.M. Kruger, President
 Shadow Hills Property Owners Association