



Dr. John A. Davitt  
Superintendent/President

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Dr. Martin Z. Pilgreen

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CITY OF LOS ANGELES  
DEC 29 2003  
ENVIRONMENTAL  
UNIT

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

Dear Ms. Zaitzevsky,

As a Ph.D. biologist, lifelong resident of the Foothill area, and full-time biology professor at Glendale College, I have serious objections to many of the conclusions drawn in the Canyons Hills Development Project DEIR (file #2002091018) prepared by Glenn Lukos Associates, Inc. (GLA). In my opinion, the report greatly understates the environmental impact of this proposed development.

97-1

Specifically:

1. Regarding the removal of up to 232 coast live oaks, followed by mitigation in the form of replanting.

The assertion that the removal of up to 232 coast live oaks would be, after mitigation and the passage of 10-20 years, "less than significant," is very difficult to accept. For one thing, the assumption is being made that a significant fraction of the 1770 oaks (mostly seedlings) to be planted<sup>1</sup> will survive to maturity. To replace the 232 slated for removal would require a survivorship of 13%. I view this as overly optimistic and would predict an actual survivorship of 1% or less. The question of survivorship is not even discussed in the report.

97-2

But even if a substantial fraction did survive, the time frame of 10-20 years is absurd, given that the most valuable trees in the area are 100-200 years old or more. I suggest that the mature coast live oak population and the plants and animals they help support will be substantially impacted for much longer than 10-20 years.

97-3

I also take issue with the conclusion that "the loss of many of the impacted trees would not result in a negative aesthetic impact because they do not contribute to the existing visual environment."<sup>2</sup> (This is in reference to trees that are not easily seen from existing highways or trails.) This statement reveals a striking lack of understanding of the nature of ecosystems. (Unseen trees support birds, mammals and reptiles and that are seen and are desirable, not to mention understory plant species, invertebrates, etc.) Ecosystems are complex webs, not simply collections of autonomous species. The statement causes me to question the credentials of the author that wrote it.

97-4

2. Regarding "re-vegetation of graded areas with native habitat," as part of the mitigation plan.

It is well-known that disturbed areas in Southern California, even when seeded with native species, rarely return to a native state. Instead they offer prime new habitat for invasive species like pampas grass, fountain grass, black mustard, Spanish broom, and others. Because of the size of the proposed development, this would represent a major "land-grab" for these species, and a concentrated new source of wind-blown seed which would certainly spread into surrounding areas. This prospect is given only scant mention in the report, but in my opinion, is sufficiently serious by itself to question the conclusion of a "less than significant" impact following mitigation.

97-5

<sup>1</sup> 1,951 minus 181 western sycamores = 1770 (Table 9, Section 7.3 of Appendix G: Biological Technical Report)

<sup>2</sup> Section 5.6, Appendix G.





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3. Regarding the wildlife corridor issue.

I agree that the development would not be a major physical impediment to movement of large animals like mountain lions between the Verdugos and San Gabriel mountains. But the report is in error in saying "the area would not represent suitable habitat." (for mountain lions), and in citing "low density of mule deer, the main food source" as a reason.<sup>3</sup> Mountain lion sightings on Mt. Verdugo are reported, and since the animals do not reside there permanently, it means the "Missing Link" corridor discussed in the report, tenuous as it may be, is in fact used by mountain lions. A major new development on the corridor's edge would squeeze them more tightly, perhaps enough to ensure that mountain lion sightings on Mt. Verdugo are a thing of the past. (Desirable to some perhaps, but not to me.)

97-6

Regarding the density of mule deer on Mt. Verdugo, it is documented that deer populations throughout Southern California's natural areas (as well as the nation's) would better be described as "over-populated" than too low to support mountain lions. Indeed it is the extreme rarity of mountain lions that has pushed the deer population to considerably higher levels than in historic times.

97-7

In conclusion, the Canyon Hills DEIR contains some erroneous assumptions, factual errors, and seems to reveal a lack of understanding of the biology of ecosystems. The environmental impact of this proposal is clearly not, in my view, "less than significant," as the report concludes. I therefore ask you to consider requiring that the study be redone, and that an improved version be released for additional review and comment. Thank you.

97-8

Sincerely,

Robert H. Mauk, Ph.D.  
2121 Valderas Dr. #67  
Glendale, CA 91208

<sup>3</sup> Section 4.5, Appendix G.

