

Debby Beck
8015 Glenties Lane
Sunland CA 91040

RECEIVED
CITY OF LOS ANGELES
DEC 31 2003
ENVIRONMENTAL
UNIT

December 26, 2003

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

Re: Project Name: CANYON HILLS PROJECT
EIR Case No. ENV-2002-2481-EIR
Reference No. SCH#2002091018

Dear Ms. Zaitzevsky,

I'm very concerned about the potential impact of the proposed Canyon Hills Project on the Sunland-Tujunga community, as well as on the natural environment surrounding it.

I'm familiar with the Draft EIR submitted for the project, and have carefully studied the section called IV. Environmental Impact Analysis; D. Biological Resources; 3. Wildlife Movement (IV.D-125).

98-1

Overview

The DEIR contains an amazing number of words, but it doesn't actually say very much. It mostly talks about things the writers state have little or no impact on the environment, and it brushes off and ignores things that actually would have an impact.

My comments center on what I believe to be a serious understatement in the Draft EIR of the number of coyotes that live in the proposed project area, and the resulting lack of discussion of the impact of the development on the community.

98-2

Maya Zaitzevsky
 December 26, 2003
 Page 2

There are also contradictory statements about the existence of coyotes and an admitted lack of a study of wildlife on the North side of Interstate 210, which is the side where they want to build 2/3 of their houses.

98-2

The "Missing Link" Distraction

The DEIR spends a vast amount of space discussing the "tenuous" nature of the "Missing Link" of the area between the Tujunga Wash (the San Gabriel Mountains) and the Verdugo Mountains being a potential corridor for wildlife movement. It rambles on for thirty eight pages, using a lot of words to basically say that putting in over 280 houses won't make wildlife movement through that area any more difficult than it currently is (because Interstate 210 and other development that already exists give the wildlife a lot of barriers to travel from one mountain range to the other).

The "Missing Link" area is actually not part of their site at all, and only relates to the "regional" movement of wildlife. Although this is certainly important, it distracts from what should be the focus of the report -- the more local wildlife that currently live in the mountains they want to develop.

98-3

The many pages they fill with words about the "Missing Link" are an attempt to distract us from noticing that they don't discuss many of the actual impacts that WOULD affect the residents, wildlife and environment.

There is a serious shortage of information given about the impact on the existing local wildlife (and the people who currently live in residential neighborhoods bordering the proposed development) not to mention the impact on the future potential residents of the development.

Because the information is missing, it is impossible to comment on it. The EIR needs to be redone completely and honestly, so that the people affected by it can comment responsibly in compliance with the City's process for reviewing EIRs.

Maya Zaitzevsky
December 26, 2003
Page 3

Starting Near the End - Their CONCLUSION

Near the end of the Wildlife Movement section, the "Project Impacts" section concludes:

"There would be no significant impacts to regional or local wildlife movement associated with the proposed development on the project site."

I believe this is just incorrect.

For example, I think they have drastically underestimated the number of coyotes in the hills surrounding the proposed development. The DEIR states that:

"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."

98-4

Adding the 887 acres of the Canyon Hills project to the 55 acres of the Duke Development property totals 942 acres. I find it impossible to believe that only "up to five" coyotes would be on 942 acres.

Since they state they are basing their conclusion "...upon documented home range sizes for coyote..." they are not basing their study on the reality of the actual site. More study needs to be done, and properly documented, in a redone EIR.

No Coyotes North of the 210???

Page 11 of the 38 pages on Wildlife the DEIR states:

"...initial surveys on the north side of Interstate 210 detected no sign of wildlife movement (not even coyotes sign was detected) (sic) and

Maya Zaitzevsky
 December 26, 2003
 Page 4

most of the survey efforts were expended on the south side of Interstate 210."

It is untrue that coyotes don't exist north of the 210. I hear them howling nearly every night within no more than a few hundred feet of my house, and have seen them in the street I live on many times, as well as on other streets in the neighborhood.

This is especially important because roughly two-thirds of the proposed number of houses would be built North of the 210, in the very same area where they claim to have found "no sign of wildlife movement (not even coyotes...)". They are simply ignoring the reality of the coyotes and other wildlife that really do exist North of the 210.

Personal Experience

I live North of the 210 freeway, just over the Verdugo Mountains from the Project Site.

I believe the Draft EIR drastically underestimates the number of coyotes on the proposed development site, because, in my personal experience, I hear at least 3, 4 or 5 coyotes howling together nearly every night, especially in the spring and summer months. In the wintertime I hear them less frequently, but there are still at least two or three of them within a few blocks of my house more than once a week in the winter.

I would estimate that I hear these coyotes within about a 20-acre area around my house, which is nestled in between a few of the Verdugo Mountains, about half a mile from one side of the proposed development. Since this is the other side of the same hills the proposed houses would be built on, I believe the coyote population I hear is quite similar to the reality of their project's coyote population. If there are 3-5 coyotes in less than about 20 acres, how many are there in 942 acres? (I'm not saying there are five in every single 20-acre area of the site, but it must be more than "up to five".

98-4

Maya Zaitzevsky
 December 26, 2003
 Page 5

A thorough study needs to be done, including studying the same areas during different seasons of the year, if they don't study the entire site (to account for the seasonal migration patterns) in order to come up with an accurate coyote count, so that the impact can be discussed. A conclusion shouldn't be drawn from a mere guess of "up to five" coyotes.

98-4

Avoiding Reality - Part One - Coyote Prey

Page 15 of the Wildlife Movement section states:

"The coyote is very adaptable to changing environments, including encroachment of human development...Coyotes prey extensively upon cottontails and jackrabbits where they occur, and supplement their diet with small mice and ground squirrels, and also with fruits, berries, insects, and carrion."

98-5

This omits the commonly known information that in adapting to human development, as the DEIR puts it, coyotes routinely prey upon domestic cats and dogs in residential neighborhoods. Often they hunt together, howling to each other as they are closing in on a pet one of them has found. When it is cornered, each coyote bites down on a different part of the animal, and they pull in opposite directions until the cat or dog is torn apart, screaming in agony, then silent. When you hear the "rustic" sound of coyotes howling, howling, howling, then a terrible screeching scream, then silence as they eat, that's what you're hearing. In the next day or two, you see yet another "Missing Pet" sign on nearby telephone poles.

Avoiding Reality - Part Two - Coyote Habitat and Litter Sizes

The DEIR also states on page 16 of the Wildlife section:

"Coyote dens are generally located on slopes of canyons and hillsides."

98-6

The 887 acres of the proposed development is ALL canyons and hillsides, and therefore perfect coyote habitat. No mention of this is made in the DEIR,

Maya Zaitzevsky
December 26, 2003
Page 6

which also states that coyote litters consist of five to ten pups at a time, which would at least double or triple their "up to five" estimate, with only one female having one litter a year, on 942 acres. This doesn't seem realistic.

98-6

Avoiding Reality - Part Three - Coyote Nursery Sites

Under the "Environmental Impacts Section, Thresholds of Significance, the DEIR states:

"In accordance with Appendix G to the CEQA Guidelines, impacts on wildlife movement would be significant if the proposed project interferes substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites."

98-7

From my personal experience, I believe the entire development site is a significant coyote habitat and therefore also a "native wildlife nursery site." In my experience, the coyotes live in the Verdugo Mountains year-round, but migrate somewhat around the hills as the seasons change, perhaps to find a warmer or cooler den, depending on the temperature.

I have seen (as well as heard) many coyotes in my neighborhood, including many small, apparently younger, coyotes, which confirms the idea that the hills are a native wildlife nursery site. And of course building over 280 homes on pristine coyote habitat would "interfere(s) substantially with the movement of any native resident or migratory fish or wildlife species"!

Avoiding Reality - Part Four - Common or Scarce? - Should we flip a coin?

Under Local Movement (Coyotes subsection) on pages 26-27 of the DEIR Wildlife section, it states:

98-8

"GLA studies indicate that coyotes are still common in the Verdugo Mountains where areas of open space occur adjacent to residential

Maya Zaitzevsky
 December 26, 2003
 Page 7

development. Coyotes commonly use residential streets at night or during early morning hours as they move in and out of residential neighborhoods in search of prey or other dietary components/subsidies.”

(My comment - this is a euphemism for pet cats and dogs.)

98-8

So now they cite a study that says “coyotes are still common in the Verdugo Mountains”. I think this is contradictory to there being “up to five” in 942 acres. More real field investigation needs to be done.

My Conclusion

I'm not that crazy about coyotes, but they are part of nature and our environment, and were here before we were. I think we are asking for trouble if the development is built. If 280 homes are built, the owners will probably have at least 200 dogs and cats. With their natural territory covered by roads and houses, either the coyotes will be driven out into the older residential areas to hunt, or they will take advantage of the newly available prey, and will kill more and more pets in the development, then breed more and become even more of a hazard to a larger and larger residential area, in order to support a larger population.

98-9

I am just interested in protecting our natural environment, and in preserving a high quality of life for current and future potential residents of the project area, whether they are human or not.

Page 29 of the EIR Wildlife section states:

“Project Impacts

There would be no significant impacts to regional or local wildlife movement associated with the proposed development on the project site.”

I hope you conclude, as I have, that this is just not correct.

Maya Zaitzevsky
December 26, 2003
Page 8

Overall, I believe the DEIR has been written with a great excess of words, on purpose, in an attempt to make us think it is very thorough and complete. In reality, I believe it leaves out a lot of important information, again, on purpose.

98-10

I think the City should require the developer to re-do the EIR in a more down to earth way that actually addresses the reality of the environment of the proposed development.

Thank you for reading this.

Best regards.


Debby Beck

cc: Councilperson Wendy Gruel