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December 26, 2003

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

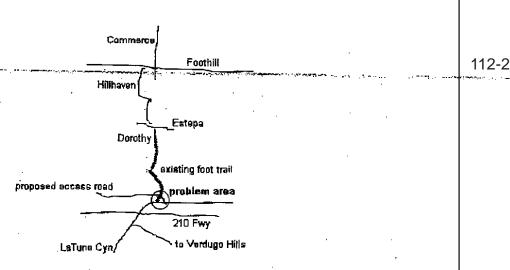
RE: ENV-2002-2481-EIR; SCH#2002091018, Canyon Hills Project- DIR Comments

Dear Ms. Zaitzevsky,

I am a 12 year resident of Tujunga, and a frequent recreational user of the Verdugo Hills. Last August 20 I attended the public meeting hosted by the Canyon Hills developers where I was hoping to find answers to some questions that I had regarding the draft environmental impact report (DEIR). I was pleased that the authors of the DEIR were there and available to answer detailed questions, and that the other key planers were there too. I did not, however, get adequate answers to my questions and I was disappointed in the knowledge that the developers and the DEIR authors demonstrated regarding the affected area. I am therefore writing you to report on some of the more serious errors and omissions that I have found in the DEIR:

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1. The draft EIR makes no mention of an important foot and bicycle trail that presently connects Tujunga directly to the Verdugo Hills. The proposed entry to the development will- as far as I can tell- cut off this trail completely. Depicted in a rough diagram below, this trail is the only available access to the Verdugo Hills from the residential areas of Tujunga. It is maintained by residents. The trail initially follows the power line access at Dorothy Road, then follows an abandoned road, and finally descends a steep grade to La Tuna Canyon Road near the bottom of the Hostetter Motorway (fire road).. This last descent is very steep, and the proposed access road to the development area will, I believe, need to cut deep into and across the hillside in such a way as to make it impossible to hike around.



The draft EIR does not sufficiently describe the details of the proposed access road. Nor does it provide any plan for an alternate trail route. I use the above trail several times each week to access the Verdugo Hills on my bicycle. If this trail were cut off- as it appears to be in the draft

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EIR- I will need to use my car to drive around via either Sunland or La Crescenta to gain the same access. I would very much like to avoid that.

- 2. The DEIR erroneously states on page IV.D-141 that mountain lions are not found in the Verdugo Hills. In the mid 1990's I know of four separate and clear sightings of mountain lions in the Verdugo Hills by three good friends of mine. In one siting, my friend Jef Lifeste (of North Hollywood) suddenly found himself just a few feet from a full size mountain lion near the top of the Brand fire road; it appeared in front of him at night just as he switched his bicycle headlamp on and after taking a break. I met him just minutes after this siting and remember well how excited and shaken he was. Around the same time the Glendale News Press also reported the death of one mountain lion found on the 210 freeway adjacent to the proposed development area. I will need to do some research to pinpoint the dates, but the article in the Glendale News Press and the names of eyewitnesses can be made available, if needed.
- 3. I found the field work and science behind section IV.D.3, "Wildlife Movement," completely inadequate to support the author's conclusions that bobcats are present in "very low numbers". I have seen bobcats near the bottom of the Hostetter fire road on many occasions (twice in just the past two months), as well as fox. Yet these animals were not detected in the study. Problems with this study include inadequate sampling, and the lack of testing of the measurement technique. A small number (21) of test sites of prepared dirt were monitored for only 4 day in April of 2002. This is not, as the authors claim, an "extensive" survey. I also doubt the validity of the technique since such prepared tests sites may appear strange to animals, and may therefore be avoided. To validate their results the author's need to provide comparative data in which their techniques are applied to areas of known wildlife densities. As presented, their data are meaningless.

As an engineer and scientist at the Jet Propulsion Laboratory in Pasadena, I regularly review scientific papers prior to publication. Upon reading the DEIR, I would not permit this report to be published. This report contains too many errors and omissions, poor science, and attempts to reach too many conclusions based on inadequate data. It is not possible to make the conclusions that the authors do based on the data that they present. It also appears to me that this DEIR is heavily slanted in favor of the developers, and that a great deal of boiler-plate material has been inserted in an attempt to cover up the lack of meaningful content. I am very concerned that the proposed development will cut off wildlife migration to and from the Verdugo Hills. The DEIR should, but does not, adequately address this concern.

Thank you for your consideration, and please feel free to contact me at any time,

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