

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207



September 27, 2004

Nicholas Hendricks  
Department of City Planning  
200 N. Spring Street, Room 763  
Los Angeles, California 90012

**Final Environmental Impact Report  
for the Canyon Hills Project  
EIR No. ENV-2002-2481-EIR, SCH No. 2002091018**

Dear Mr. Hendricks:

The proposed Canyon Hills development project in the City of Los Angeles is located within the Rim of the Valley Trail Corridor portion of the Santa Monica Mountains Conservancy (Conservancy) jurisdiction. The Conservancy is concerned about potential significant adverse impacts to the visual, biological, and recreational resources located on the project site, adjacent parklands, and the Verdugo Mountains ecosystem. The project as proposed could be fatal to the long-term presence of bobcats, badger, foxes, and mountain lions in the Verdugo Mountains ecosystem.

**Wildlife Movement Corridors**

In our comment letter on the NOP, it was argued that wildlife movement across Area B would be severed due to the development footprint. In response the applicant stated in the FEIR (Final Environmental Impact Report) that "existing topography currently precludes, or at least severely limits, wildlife movement from the northwest quadrant of Development Area B in a southeast direction through the proposed grading limits in Development Area B." According to the applicant the "most direct and by far the most accessible path" to cross La Tuna Canyon Road is along a drainage (Drainage 14) at the western edge of the property. There is a large house on the north side of La Tuna Canyon Road at this drainage. And the south side is a highly fractured subdivision with many of the lots developed. No topographic analysis has been completed of the receptivity of this area as a corridor at full buildout of the subdivision. The area has very steep topography.

While it may be true that many of the crossings of La Tuna Canyon Road currently occur at this drainage, this cannot be guaranteed to occur into the future. However, the local residents have observed very few signs of animals crossing La Tuna Canyon Road at this drainage. The viability of this crossing is a huge unknown. This is not a secure crossing point because public open space does not occur on either side of La Tuna Canyon Road. There is no guarantee that

Mr. Nicholas Hendricks  
Canyon Hills project (SCH No. 2002091018) FEIR comments  
September 27, 2004  
Page 2

this will be the most "accessible" path into La Tuna Canyon Park into the future. Just to the east, the project site forms a long frontage with La Tuna Canyon Park. The wildlife corridor must connect to permanent open space. This can occur without the additional purchase of land if the project has a dedicated corridor through Area B that leads directly to the abutting La Tuna Canyon Park. The only way a permanent wildlife movement corridor can be insured is by having a guaranteed connection to large tracts of parkland. The FEIR is deficient for not including this potential option.

The proposed project would sever the several hundred acres that will be preserved in the northwestern portion of Area A from the rest of the Verdugo Mountains. The response to this comment was that this area is effectively severed already from the rest of Area A because of the prominent northeast to southwest trending ridgelines. The ridgelines do not block movement. They may reduce movement, but they do not block it. If no access is provided for wildlife movement between the open space in Area A and the La Tuna Canyon Road underpass, then the several hundred acres of open space will be biologically isolated. The Verdugo Mountains are an already stressed ecosystem. Relatively easy project modifications would prevent the further fracturing of this ecosystem. To maintain a corridor, modifications to the project would include removing some units.

#### Alternatives

In our comment letter on the NOP, we stated that "an alternative must be added that 1) removes all development from Area B south of the 210 Freeway and 2) provides a functional wildlife movement corridor between the northwestern and southeastern portions of Area A, north of the 210 Freeway." Upon further analysis this could be accomplished with only minor modifications to Alternative B. Alternative B places all of the development in Area A. Concentrating all of the development in Area A would prevent impacts on wildlife movement in Area B. Preserving Area B is the only method to adequately protect the intermountain range wildlife movement corridor between the San Gabriel Mountains through Tujunga Wash to the Verdugo Mountains, including that portion south of La Tuna Canyon Road. The development footprint in Area A under this alternative with slight modifications could prevent the isolation of the open space in the northwestern portion of Area A. The footprint would just have to be realigned so that a corridor of a minimum of 500 feet in width is maintained between the northwestern and southeastern portion of Area A. Removal of approximately six units along the main access road would create a corridor, provided no other expansion of the project occurred. Only roads would be allowed to traverse this corridor.

Per discussions with the applicant, the applicant stated that the only reasons Alternative B is infeasible is 1) the surrounding neighbors object to the smaller lot sizes and 2) the higher density will not have the same internal aesthetic appeal as the less dense alternatives. If the applicant believes Alternative B to be infeasible, then the EIR is deficient for not providing

Mr. Nicholas Hendricks  
Canyon Hills project (SCH No. 2002091018) FEIR comments  
September 27, 2004  
Page 3

feasible alternatives. However, staff does not concur that this alternative is infeasible. It is highly feasible and would prevent many of the impacts from the other alternatives.

#### Visual Impacts

In our comment letter on the NOP, we stated that "the DEIR is inadequate and deficient for failing to include a visual simulation of the main access road to Area A from La Tuna Canyon Road." The response to this comment was 1) that the DEIR provided an extensive analysis based on the number of pages it occupied in the DEIR and 2) that it has already been concluded that there would be significant visual impacts and that conclusion would not be changed with one more simulation. While the conclusion may not change, the decision makers need to be provided as much information as possible so that they understand the impacts from the project. Virtually all of the project was accounted for in the visual simulations except for the main access road to Area A from La Tuna Canyon Road. This entrance will have to traverse an extremely steep slope that runs along the 210 Freeway for over 3,000 feet. The resulting grading will greatly impact the viewshed of the 210 Freeway, La Tuna Canyon Road, and La Tuna Canyon Park. Decision makers must be provided with this information.

The FEIR is deficient for failing to provide decision makers with the true project visual impacts. The FEIR provided a visibility analysis and a visual simulation but those studies were not joined to provide a complete picture. Each of the analyses used different observer/vantage points. The number of houses that are visible from each of the points should have been identified. Using the visibility analysis provided in the DEIR, our staff has analyzed the number of single-story homes that will be visible from the 210 freeway. In Area A, 52 homes will definitely be visible and another 40 homes will most likely be visible from the freeway. And approximately 32 homes will be visible from the freeway for Area B.

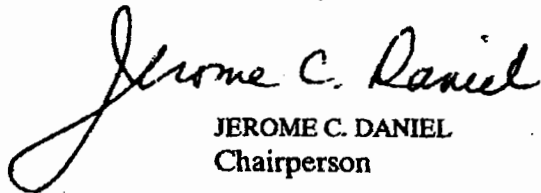
#### Community Facilities District

In order to guarantee the safety of the public visiting the open space dedication and of the new adjoining homeowners, as well as the ecological integrity of the open space, another critical mitigation measure that must be included in the EIR is a permanent funding mechanism to maintain the property. Dedication of land is only a complete mitigation measure if funding is provided. Two mechanisms to provide this maintenance funding include a non-wasting endowment set up by the developer over a specific period of time, or a property assessment. A minimum of \$50,000 per year must be provided for maintenance of the open space. To our knowledge, a Community Facilities District (CFD) is the optimal method for such a funding source. The Conservancy's joint powers entity, the Mountains Recreation and Conservation Authority, or the City of Los Angeles Department of Recreation and Parks can be the entity that forms, administers, and benefits from the CFD.

Mr. Nicholas Hendricks  
Canyon Hills project (SCH No. 2002091018) FEIR comments  
September 27, 2004  
Page 4

The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Susan Poynter of our staff at (310) 589-3200 ext. 124 and at the above Ramirez Canyon Park address.

Sincerely,

A handwritten signature in black ink that reads "Jerome C. Daniel". The signature is written in a cursive style with a large, looping initial "J".

JEROME C. DANIEL  
Chairperson