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CITY OF LOS ANGELES

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ENVIRONMENTAL  
DIVISION

SUBJECT: COMMENTS ON CANYON HILLS DRAFT EIR

The project site is within the Verdugo Mountains Significant Ecological Area (SEA) as identified in Los Angeles County's 1976 SEA Study. However, as far as I can tell, the DEIR does not mention this. Even though the SEAs are a County rather than a City concept, the DEIR should nevertheless let the public know that the project area was one of only 61 sites in the entire county that met the County's selected criteria. To quote from that study, the location of the Verdugo Mountains "...makes them important for scientific study, genetic interchange between otherwise isolated populations, and recreation to urban residents." "The area serves as an island refuge, providing what remains of a link between plant and animal populations found in the Santa Monica and San Gabriel Mountains. Genetic interchange, by way of this linkage is important in perpetuating the genetic variability in isolated populations, and consequently the maintenance of healthy ecosystems."

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In not mentioning the project site's SEA status, relevant information is not given to the general public. Discussing this fact would raise awareness about the ecological significance of the Verdugo Mountains generally. And, given the importance of genetic interchange in this SEA, a complete discussion of the SEA would focus attention on the critical location of the Canyon Hills project site. This project site occupies much of the land between the bulk of the Verdugo Mountains to the south and the Tujunga Wash and the San Gabriel Mountains to the north.

Given the importance of wildlife connectivity at this location, I looked at Alternative B, which proposes no development south of the I-210. The analysis for that Alternative concludes that the "...impacts to wildlife movement under Alternative B would be the same as under the proposed project." In other words, according to this analysis, it will have no effect on wildlife mobility if the entire area south of I-210 is in open space or whether it contains homes that require wildlife to either filter through this neighborhood or follow the narrow corridor that leads to the La Tuna Canyon Wash. Once at the La Tuna Canyon Wash, the analysis asserts that wildlife will be equally inclined to proceed east along the

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wash regardless of whether open space or homes are located north of the wash. I am having difficulty buying that conclusion. If the Final EIR maintains that Alternative B has no advantages for wildlife movement over the Proposed Project, it should support these conclusions by citing studies showing that residential development in these relative locations would not discourage wildlife movement.

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I recall that the Santa Monica Mountains Conservancy is trying to assemble a right of way for a Rim of the Valley Trail system. I apologize for not doing my homework on this, but what land is proposed to serve as the connector between the Tujunga Wash and the Verdugo Mountains for this Rim of the Valley Trail? If the route is already acquired somewhere else north of La Tune Canyon Road, please discuss that fact in the final EIR. If this segment of the Rim Trail is still unresolved, please discuss why it could not be incorporated into the portion of the site south of the I-210. If in fact this area would make an appropriate route for the Rim Trail (as well as the wildlife connectivity discussed above) this would also seem to increase the relative benefits of Alternative B, putting all 280 homes north of the freeway and preserving everything south of the freeway for wildlife habitat and trail corridor.

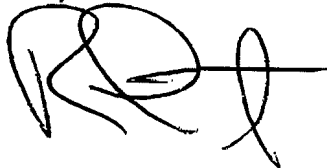
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Finally, the success of the open space component of this project will be affected by who owns and manages the open space. If this was mentioned in the DEIR, please let me know where this information is located.

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Thank you very much for the opportunity to comment on the DEIR. I look forward to reading your responses.

Sincerely,



Rick Pruetz