



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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EDMUND G. BROWN JR., Governor  
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March 19, 2015

RECEIVED  
CITY OF LOS ANGELES

MAR 25 2015

ENVIRONMENTAL  
UNIT

Ms. Karen Hoo  
Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report;  
Andora Project, City of Los Angeles, Los Angeles County; SCH 2015021057**

Dear Ms. Hoo:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Andora Project Draft Environmental Impact Report (DEIR). The project area is located at 9503 Andora Place, in the Chatsworth Community within the City of Los Angeles. The Project Site is an approximately 91-acre, undeveloped parcel, bounded by open space to the north, open space including Chatsworth Oaks Park/Chatsworth Nature Preserve/Chatsworth Reservoir to the south, residential, open space, and the Ventura County boundary to the west, and residential land uses to the east.

The Project proposes the development of 42 single family homes and two open space lots on the approximately 91 acre parcel. The Proposed Project would be developed into an equestrian-oriented community along two new streets. Primary access to the Project would involve extending Andora Avenue as a 60-foot wide street into the proposed development. A second road would be completed as a 54-foot wide public right of way and standard cul-de-sac. Approximately 51 acres of the Project site would remain as open space.

The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources.

### Specific Comments

- 1) Wildlife Movement and Connectivity. The Project area supports significant biological resources and is part of a regional wildlife movement corridor allowing uninterrupted wildlife movement from the Santa Susana Mountains, under the 118 freeway to Chatsworth Reservoir/Chatsworth Nature Preserve. The project area contains habitat connections and supports movement across the broader landscape, sustaining both transitory and permanent wildlife populations. Onsite features, which contribute to habitat connectivity, should be evaluated and maintained. Aspects of the project could create physical barriers to wildlife movement from direct or indirect project-related activities. Indirect impacts from

lighting, noise, dust, equestrian activity, and increased human activity may displace wildlife in the general area. The EIR should include a detailed analysis of impacts to local wildlife movement and connectivity. The effects, as a result of the proposed project, should be fully described and measures to minimize those impacts incorporated into the project. Examples of minimization measures include using span bridges or adequately sized bottomless culverts to allow natural hydrologic processes and wildlife movement to continue through the site, reducing edge effect by clustering development, and keeping trails within the development footprint and not on designated open space.

- 2) Santa Susana Tarplant (*Deinandra minthornii*). The Project is located in a region that supports Santa Susana tarplant.
  - a) Santa Susana tarplant is designated as a state-listed rare<sup>1</sup> plant pursuant to the Native Plant Protection Act (NPPA; Fish and Game Code §1900 *et seq.*). The NPPA prohibits the take<sup>2</sup> of state-listed rare plants unless authorized by the Department or in certain limited circumstances. Take of Santa Susana tarplant or other state-listed rare plants that may occur as a result of the Project may only be permitted through an incidental take permit or other authorization issued by the Department pursuant to California Code of Regulations, Title 14, section 786.0 subdivision (b). Please contact the Department early if any NPPA or CESA listed species are identified within the vicinity of the Project.
  - b) The Department recommends conducting surveys for Santa Susana tarplant, in addition to any other Rare, Threatened or Endangered plant that has the potential to occur in the region and including survey results in the Project DEIR along with any proposed avoidance and minimization measures if sensitive plants are found on-site.
- 3) Fuel Modification Impacts. The Department recommends all fuel modification requirements be met on the individual lots, and not in conserved habitat adjacent to the lots. Habitat being subjected to fuel modification (thinning, trimming, removal of mulch layer, etc.) should be considered an impact to these vegetation communities and mitigated accordingly. It is recommended fuel modification activities not take place on lands set aside as mitigation for other Project related impacts. The Department also recommends any irrigation proposed in fuel modification zones drain back into the development and not onto conserved habitat land as perennial sources of water allow for the introduction of invasive Argentine ants.

### General Comments

- 4) Project Description and Alternatives. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
  - a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas; and,

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<sup>1</sup> See Cal. Code Regs. tit. 14, §670.2, subd.(c)(4)(D)

<sup>2</sup> Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

- b) a range of feasible alternatives to project component location and design features to ensure that alternatives to the proposed project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
- 5) Lake and Streambed Alteration Agreements (LSA). As a Responsible Agency under CEQA Guidelines section 15381, the Department has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency, the Department may consider the Negative Declaration or Environmental Impact Report of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA<sup>3</sup>.
- a) The project area supports aquatic, riparian, and wetland habitats; therefore, a preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.<sup>4</sup> Some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.
- b) In project areas which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, the Department recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
- c) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.
- 6) Wetlands Resources Policy. The Department, as described in Fish & Game Code § 703(a) is guided by the Fish and Game Commission's policies. The Wetlands Resources policy (<http://www.fgc.ca.gov/policy/>) of the Fish and Game Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in

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<sup>3</sup> A notification package for a LSA may be obtained by accessing the Department's web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

<sup>4</sup> Cowardin, Lewis M., et al. 1970. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

California. Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion which would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values".

- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. The Department encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. The Department encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, the project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. The Department recommends mitigation measures to compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.
  - b) The Fish and Game Commission's Water policy guides the Department to [insure] the quantity and quality of the waters of this state should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this state, and prevent the degradation thereof caused by pollution and contamination; and endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. The Department recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible.
- 7) California Endangered Species Act (CESA). The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subs. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a

separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

- 8) **Biological Baseline Assessment.** To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats, the DEIR should include the following information:
- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);
  - b) a thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <http://www.dfg.ca.gov/habcon/plant/>);
  - c) floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008<sup>5</sup>). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
  - d) a complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the project. The Department's California Natural Diversity Data Base (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at [http://www.dfg.ca.gov/biogeodata/cnddb/submitting\\_data\\_to\\_cnddb.asp](http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp);
  - e) a complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service; and,

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<sup>5</sup> Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. *A manual of California Vegetation*, 2nd ed. ISBN 978-0-943460-49-9.

- f) a recent, wildlife and rare plant survey. The Department generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases. Department rare plant survey protocol can be found at [http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/protocols\\_for\\_surveying\\_and\\_evaluating\\_impacts.pdf](http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/protocols_for_surveying_and_evaluating_impacts.pdf)
5. Biological Direct, Indirect, and Cumulative Impacts. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:
- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address project-related changes on drainage patterns and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included;
  - b) a discussion regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
  - c) the impacts of zoning of areas for development projects or other uses nearby or adjacent to natural areas, which may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document; and,
  - d) a cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
6. Avoidance, Minimization, and Mitigation for Sensitive Plants. The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts. The Department considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2008).

7. Compensatory Mitigation. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
8. Long-Term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion.
9. Nesting Birds. In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation and construction occur outside of the peak avian breeding season, which generally runs from February 1<sup>st</sup> through September 1<sup>st</sup> (as early as January 1 for some raptors). If project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds within three days prior to the work in the area, and ensure that no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
10. Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the project site and permanently moving it to a new location. The Department generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. The Department has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals, and their habitats.
11. Moving out of Harm's Way. The proposed project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, the Department recommends a qualified biological monitor approved by the Department be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by

grubbing or project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.

12. Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.
13. The Department recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.
14. Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the project; examples could include retention of woody material, logs, snags, rocks, and brush piles for a more detailed discussion of special habitat elements).

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Kelly Schmoker at (949) 581-1015 or [Kelly.Schmoker@wildlife.ca.gov](mailto:Kelly.Schmoker@wildlife.ca.gov).

Sincerely,



Betty J. Courtney  
Environmental Program Manager I  
South Coast Region

cc: Erinn Wilson, CDFW, Los Alamitos  
Sarah Rains, CDFW, Santa Barbara  
U.S. Fish and Wildlife Service, Ventura Office  
Valarie Carrillo-Zara, Los Angeles Regional Water Quality Control Board  
Scott Morgan, State Clearinghouse, Sacramento





## CHATSWORTH NEIGHBORHOOD COUNCIL

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Case No. ENV-2014-3995-EIR

Project Name: Andora Project

Project Applicant: DB Companies, c/o Daniel Bernstein

Project Location Address: 9503 Andora Place (Assessor Parcel No. 2724-007-004)

Karen Hoo

Environmental Analysis Section

Department of City Planning

200 N. Spring Street Room 750

Los Angeles, Ca. 90012

[planning.envreview@lacity.org](mailto:planning.envreview@lacity.org)

The Chatsworth Neighborhood Council (CNC) would like to express our concerns for some aspects of the Andora project at 9503 Andora Place.

The project has been presented to the CNC Land Use and Equestrian Committee as a subdivision with 33 homes and two large open space lots numbered 34 and 35 and yet the filing for the EIR states a proposed development of a 42 unit single-family subdivision and two open space lots. It is also goes on to say that the project would be developed into an equestrian-oriented community. The plan that was presented to us indicated that the subdivision would have a K overlay but there will only be eight homes that will truly be able to have horses. The usable lot sizes on many lots, if not most lots, have been reduced due to conservation easements and emergency roads or trail easements. The Chatsworth Community Plan indicates that development west of DeSoto be horsekeeping, as well as north of Chatsworth Street. All recently approved subdivisions of A or RA type lands, have been equestrian capable lots of 20,000 square feet or more, usable for horsekeeping. This plan does not provide viable horsekeeping. Please provide guidance in the environmental review how a K-overlay established to foster horsekeeping, relates to this reduced usable lot size.

One of the biggest concerns deals with the secondary emergency access. The grade on the small portion of Plummer Street leading to the secondary access is steep and difficult to maneuver. One of the residents at the top of that grade has lived there for many years and has expressed concern because of people almost going over the side, stalling their cars because they unable to drive down the steep grade and sliding down the hill during inclement weather. To prevent these calamities the resident's father had planted a tree to try to keep people from driving off the road. The applicant has stated that he will make the secondary access better on the property in the project but is unable to do anything to Plummer Street that connects to his secondary access. A long term resident in this area recently fell on this narrow street and broke a bone. Another community member took various common equipment (levels, rulers, paper, and pens) and determined at the steepest point, on the way to the emergency access, on the existing road (dedicated driveway) the



slope was 15 to 16 degrees. This is too steep to be used for effective emergency access especially if towing a horse trailer. The road right of way is narrow and significant changes are likely not practical. Unfortunately Building and Safety (Van Nuys counter) said since it already is a road, it won't need any improvement. We do not understand how this can be part of a viable emergency access road in a fire prone hillside area, with high winds very common. Additionally, on the private land where emergency access reportedly is being made, there are large boulders and sharp turns required to move through the land. We question if this is a viable emergency access route, and would like the environmental review documents to walk both the steep part of the dedicated street and the proposed emergency access to understand the topography as you create a document to be relied on for decision makers on this multi-million dollar project.

The residents of the Roy Rogers Estates (the development south west from the intersection of Lassen and Andora Avenue) have expressed concern about how they would get out during a fire if the added cars, trucks with horse trailers and fire engines are trying to get in and out at the same time. The secondary emergency access that connects to Plummer would end up on Valley Circle Blvd. which would have its own traffic from the community of Lake Manor. The residents of the Roy Rogers Estates are concerned how they would even be able to use the secondary emergency access as they have been told it would be a good thing for them. If the gate is locked how would they be able to get out and who would have the key to let them out?

This has always been a wildlife corridor for the animals coming from the Chatsworth Nature Preserve and also from the surrounding mountains. It has animals coming from the Santa Monica Mountains that move through the Santa Susana Mountains to Santa Clarita. There is concern for required brush clearing from the homes and how it will affect the Open Spaces. This project hopefully will preserve the canyon and the trails that have been used for at least hundred years by travelers of the past, local equestrians and hikers.

The Chatsworth Community Plan provides for a study of this area for a viable wildlife corridor or habitat. This area is critical with current development. The City has expanded to its western boundary, since this project meets Ventura County, and is the last parcel in the City. It is the sole viable link between the 1200 acre Chatsworth Nature Preserve (Reservoir), specifically mentioned in the Community Plan and the 670 acre State Park. The area is documented as used in current times by the collared mountain lions of the Santa Monica Mountains (see attached dot map "Cougars!") showing the present wide canyon is viable- how narrow can this canyon be made (see proposed map of homes); with related light effects, landscaping removal for home insurance, noises and fences, yet still be viable? We ask that the City immediately study the area, as mandated in the Community Plan, and make relevant determinations to provide viable access for wildlife.

Note two important current developments in the Wildlife Corridor in this area: the wildlife crossing at Liberty Canyon (Ventura Freeway) has obtained initial study funding and is being pursued actively. In addition, this area is prime to be considered as part of the federal Rim of the Valley Corridor Study which presently is being reviewed in Washington D.C.

We have had comments on the traffic issue from the neighbors in the adjacent Roy Rogers Estates. These homes have only one access on Andora to their homes and there is a great concern for a traffic study that was done during the holiday season. We have not been given an exact date of the traffic study but was told that it was done in the holiday season. This is not an accurate measurement of traffic when schools are out, residents are traveling or businesses are operating on holiday hours. The corner where Andora meets Valley Circle is a strange configuration. Oakwood Cemetery has an entrance there and Valley Circle, Lassen. Baden and Andora all end up at this intersection. There are more homes affected by this intersection than the



Roy Rogers Estates. There are homes on Valley Circle, Lassen and Baden. The neighbors have requested traffic calming mitigations. We would request that the traffic issues in this area be considered in the environmental documents.

There are seven oak trees at the entrance to the property on Andora. They are close to the road but we were told that they may be able to leave them there if the city would agree to a narrowing of the road in the vicinity of the trees. This would still allow emergency vehicles to get through the area as needed. These trees should also be in protected conservation areas and care should be taken to retain them in a lower area as they presently are so their water supply is not seriously affected.

There are boulders/rock outcroppings in the area that are believed to already be protected but would want to make sure that there is something in writing to protect these boulders. We will be asking for deed restrictions against damaging or destroying the boulders.

There have been comments from the neighbors north of the project on Andora complaining about the sewers backing up in the street every few months and they are concerned about adding homes to a sewer system that is already inadequate.

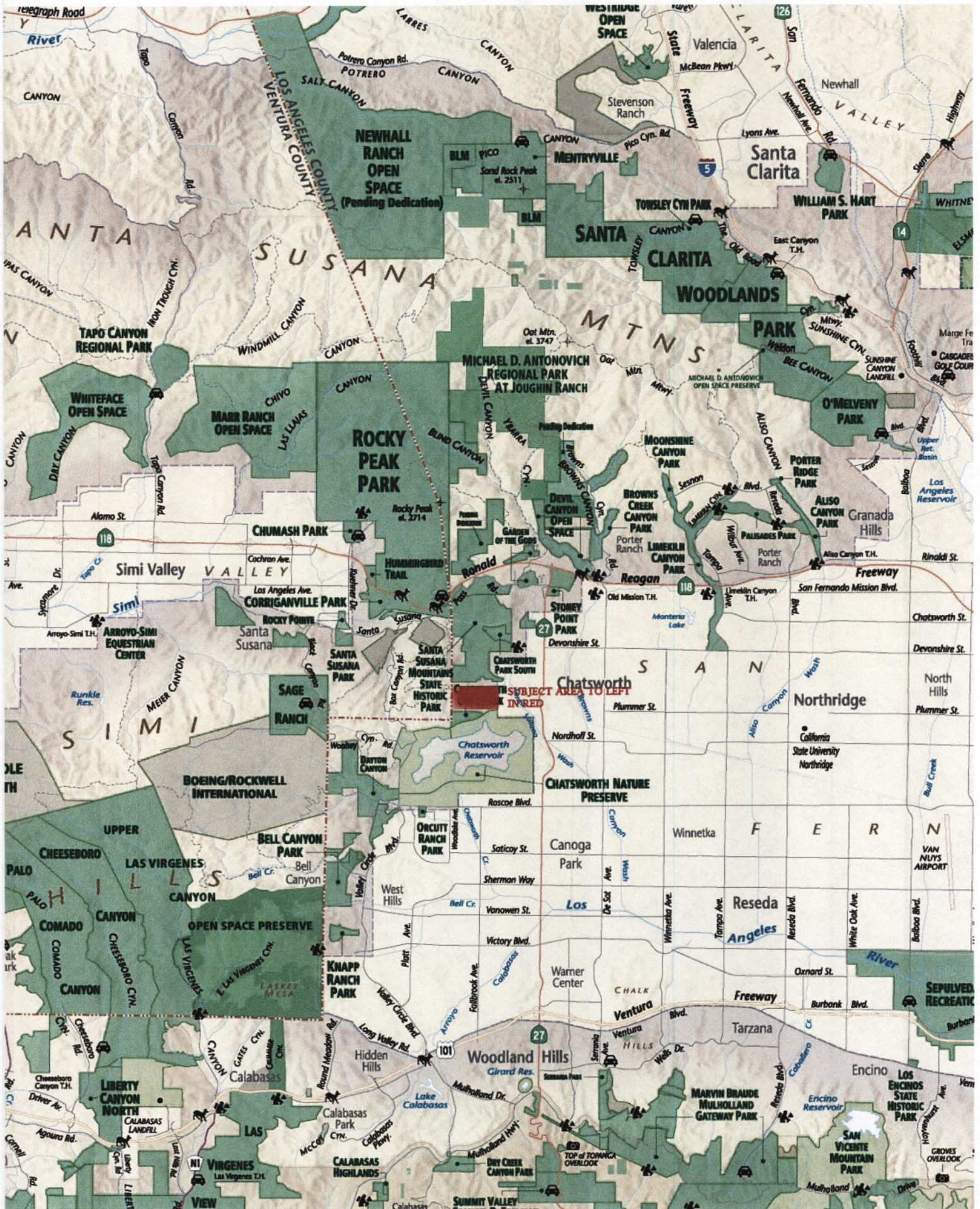
This area has been identified as one of the most fire prone areas in the San Fernando Valley by Fire Department sources within the City of Los Angeles and the County of Los Angeles. Wild fires are almost a way of life in Chatsworth. They start in areas to the north and east of Chatsworth and work their way through the hills coming south through where the project is located and usually end up in Malibu. Fire is a huge concern. We have heard before that development will stop the fires but it has not worked that way in Porter Ranch which is heavily developed and is of great concern to the Fire Department during the windy time of the year. Staging during a fire is usually at Porter Ranch to save the homes there and Chatsworth is left with limited resources.

Local residents went to the Planning Counter in Van Nuys and were given the Baseline Hillside Ordinance that sets variable limits on grading for cubic yards. It appears grading in the approximate maximum amount of 5000 cubic yards per RE20 or RE40 home lot would be the maximum allowed. The Hillside Ordinance also requires development along existing contour lines, and no export on hillside lots. The applicant has declined to state the amount of grading recently but last summer told the CNC Land Use Committee the 33 home development would require 300,000 to 450,000 cubic yards of grading and a significant export due to taking down a higher point in the development. We ask that the environmental documents provide an explanation as to how the Baseline Hillside Ordinance affects the development proposal and what limitations it sets.

Sincerely,

Linda van der Valk  
Land Use Chair



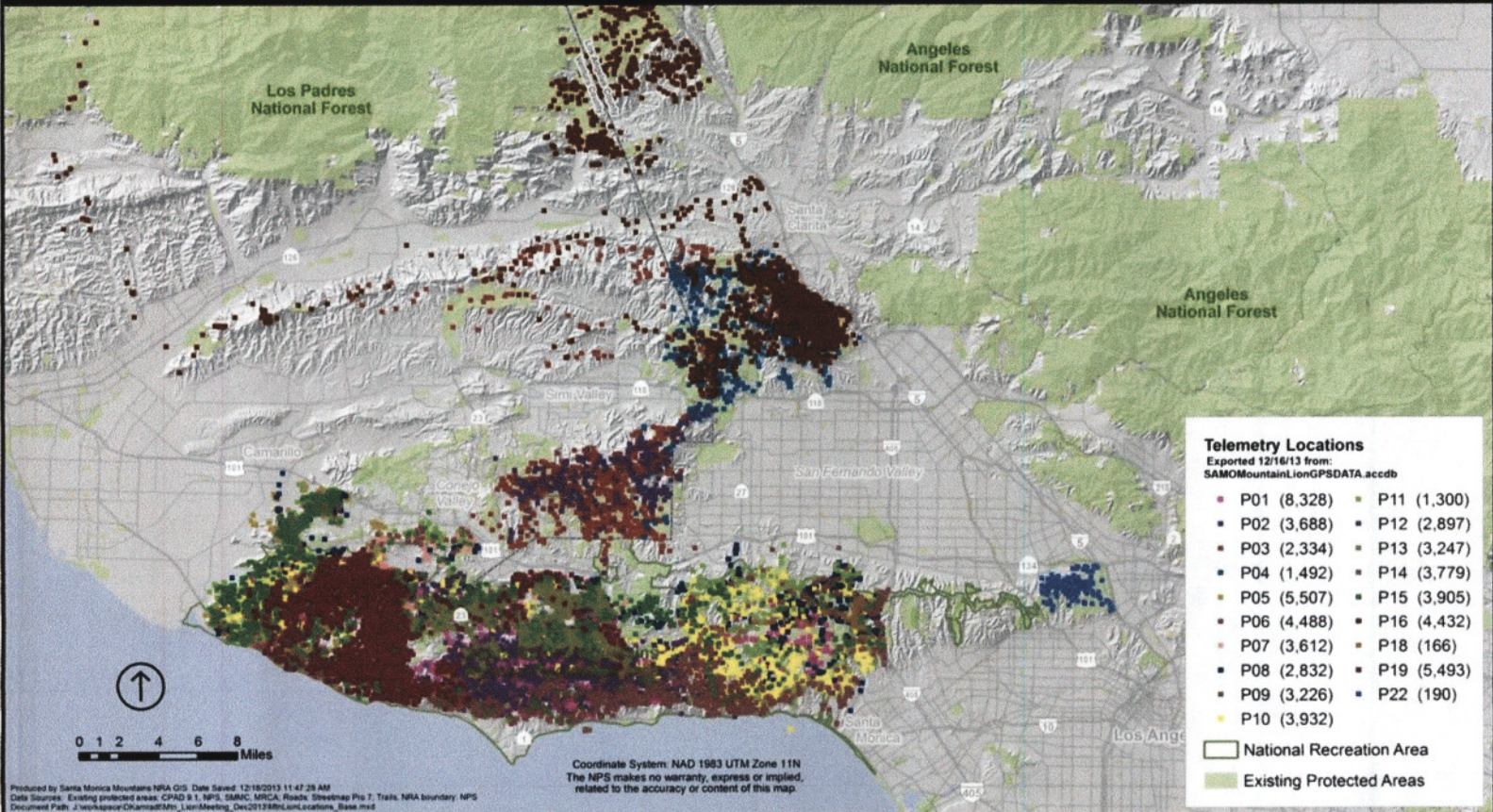




# Mountain Lion Locations

Santa Monica Mountains National Recreation Area

National Park Service  
U.S. Department of the Interior





**6. Grading. [§ 12.21 C.10.(f) of the LAMC]**

Notwithstanding any other provisions of the Municipal Code, total Grading (Cut and Fill) on a Lot shall be limited as outlined below. No Grading Permits shall be issued until a Building Permit is approved.

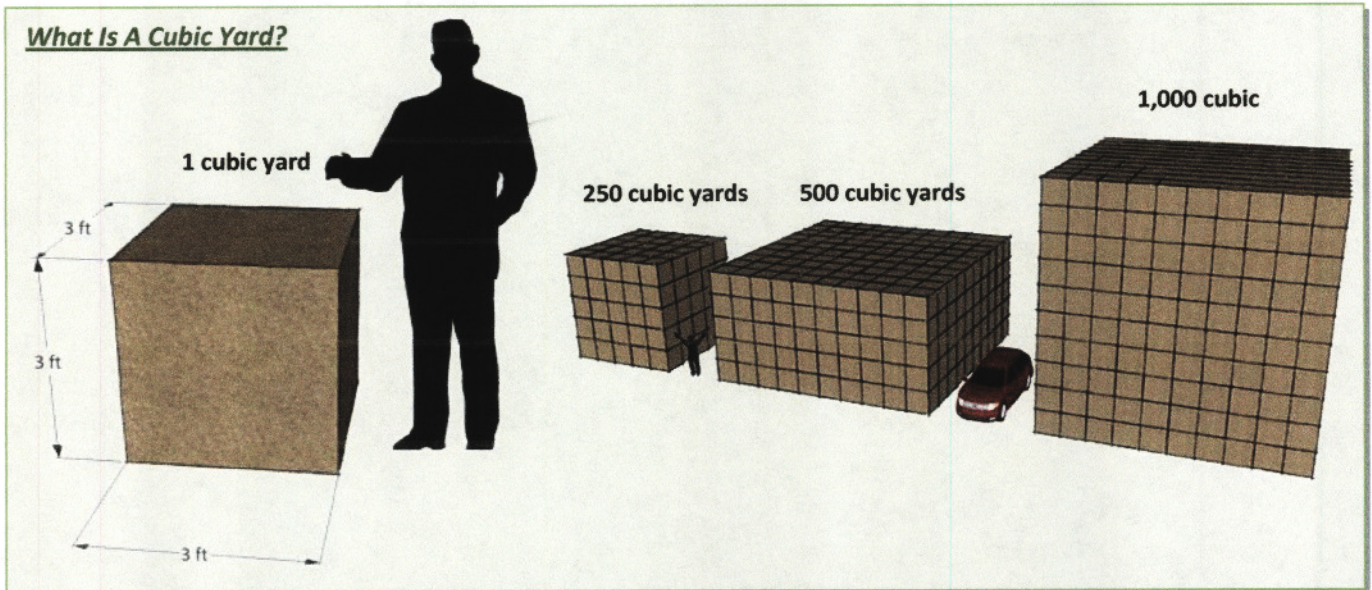
**a. Maximum Grading Quantities. [§ 12.21 C.10.(f)(1) of the LAMC]**

The cumulative quantity of Grading, or the total combined value of both Cut and Fill or incremental Cut and Fill, for any one property shall be limited to a base maximum of 500 cubic yards plus the numeric value equal to 5% of the total Lot size in cubic yards.

*Example: a 5,000 square-foot Lot would have a maximum Grading amount of 750 cubic yards (500 cubic yards for the base amount + 250 cubic yards for the 5% calculation).*

However, the cumulative quantity of Grading shall not exceed the maximum “by-right” Grading quantities outlined by Zone in Table 7 – Maximum “By-Right” Grading Quantities below.

Table 7 Maximum “By-Right” Grading Quantities	
Zone	Maximum Grading (cubic yards)
R1	1,000
RS	1,100
RE9	1,200
RE11	1,400
RE15	1,600
RE20	2,000
RE40	3,300
RA	1,800



**b. Import/Export Limits. [§ 12.21 C.10.(f)(2) of the LAMC]**

The maximum quantity of earth import or export shall be limited to the following quantities:

- (1) **Lots Fronting on Standard Hillside Limited Streets or Larger.** For a property which fronts onto a Standard Hillside Limited Street or larger, the maximum quantity of earth import shall be no more than 500 cubic