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To:
Los Angeles Department of City Planning

Presented at:
Andora Estates, Joint Public Hearing
Case No.: VTT-73427

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We, the Chatsworth Nature Preserve Coalition, advise LA City Planning that the current Andora Estates project proposal will fatally degrade a vital wildlife corridor crucial to the Chatsworth Nature Preserve. We further advise of significant deficiencies in the Final Environmental Impact Report's (FEIR) biological resources response, and inadequate field-survey design.

DESTRUCTION OF WILDLIFE CORRIDOR

Background

The project site contains a vital wildlife corridor connecting the Chatsworth Nature Preserve (CNP) to nearby open space. The site sits directly between the CNP and nearby 680-acre State Park, allowing animals safe passage between the two.

Chatsworth-Porter Ranch Community Plan Objective 13 recognizes the wildlife corridor's importance, and calls for City Planners to plan for its preservation:

"To further define the link between the Chatsworth Reservoir (CNP), wildlife corridors, and the community by identifying natural wildlife habitats, migration paths, and archaeological/paleontological sites and planning for their preservation;" -- Chatsworth-Porter Ranch Community Plan Objective 13

The FEIR correctly states: **adequate wildlife corridor width = 1000-1600 feet.**

FEIR Fatally Misrepresents Corridor

The FEIR erroneously states the proposed plan secures a 1560' wide wildlife corridor. It does so by mischaracterizing the corridor via four flawed assertions:

1. The FEIR arbitrarily determines corridor width by measuring a wide expanse of the project site's undeveloped dimension, 1560' (see Wildlife Linkages map, FEIR figure III-1¹). In reality, adequate wildlife corridor width is determined by measuring a corridor's narrowest passable point.

2. The FEIR fails to take into account two 300' edge-effects (600' total) from the project's developed area and from two developed parcels to the southeast corner of the project site.
3. The FEIR's Wildlife Linkage map incorrectly shows a wildlife corridor passing through the project site's western undeveloped portion¹. In reality, that is an excessively steep cliff-lined route with vertical drop offs of 20 feet and greater. Animals are more likely to traverse the much-gentler sloped canyon located in the eastern developed portion of the project site.
4. The FEIR falsely asserts a corridor passing through that cliff-lined route would be preserved. In fact, the bordering privately-owned land is at high risk for development; subdivision has been hotly pursued in the past.

Project Plan Destroys Viable Wildlife Corridor

The project site's eastern portion contains a viable wildlife corridor. Its gentler-sloping terrain is favored for wildlife transit, and it is bordered by state park land to the north, so is not at risk of being closed off by development. Wildlife use this corridor to transit from the CNP through the project site, into the state park and northward into large open space swathes. This vital link supports wildlife connectivity between the Santa Monica Mountains to the south, and the Los Padres forest to the north.

The project plan's 33 homes would sit squarely on top of this viable corridor. As the FEIR clearly illustrates in its Edge Effect map², the project plan would completely eliminate this viable corridor within the project site. The project plan would secure only a narrow 309'-wide passageway through an adjacent trapezoid-shaped parcel purchased by the developer, bordered to the northwest by privately owned land at high-risk of development. As cited by the FEIR (pg III-48) and the California Department of Fish and Wildlife (CDFW) professional resource specialist, adequate corridor width is 1000 to 1600 feet.

SIGNIFICANT DISCREPANCY IN FEIR BIOLOGICAL RESOURCES RESPONSE

We note a significant discrepancy in the FEIR responses compared to the data presented in the EIR. The bird list submitted by the consultant(s) includes observations of Yellow Warbler; however, in a response to comment from Elizabeth Harris, the responder asserted that no Yellow Warblers had been observed. A similar response was given to most or all of the commenters mentioning special status birds. Furthermore, although no Burrowing Owls or Long-eared Owls were observed by the consultant(s), they have been observed at CNP. The responder included the conclusion of no significant impact to any of these species.

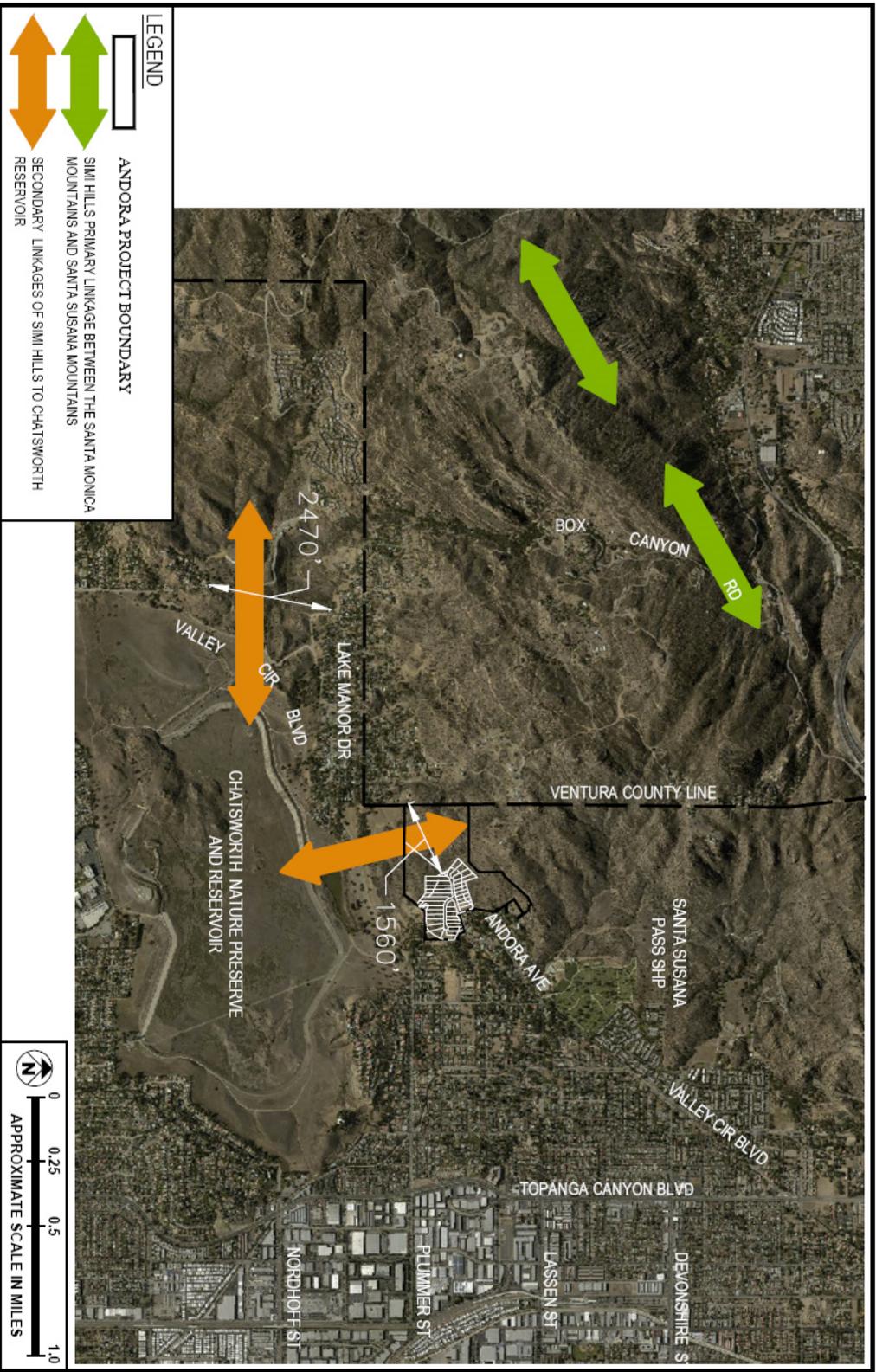
INADAQUATE FIELD STUDY DESIGN

The California Department of Fish and Wildlife's DEIR comments included mention that the number of wildlife surveys was insufficient to accurately characterize the wildlife. That survey-design inadequacy has not been remedied in the FEIR. It bears directly on whether special status species would have been detected on just a few field visits to the area. What makes species "special status" is often their rarity. They are not likely to be detected by casual observation or inadequate survey design.

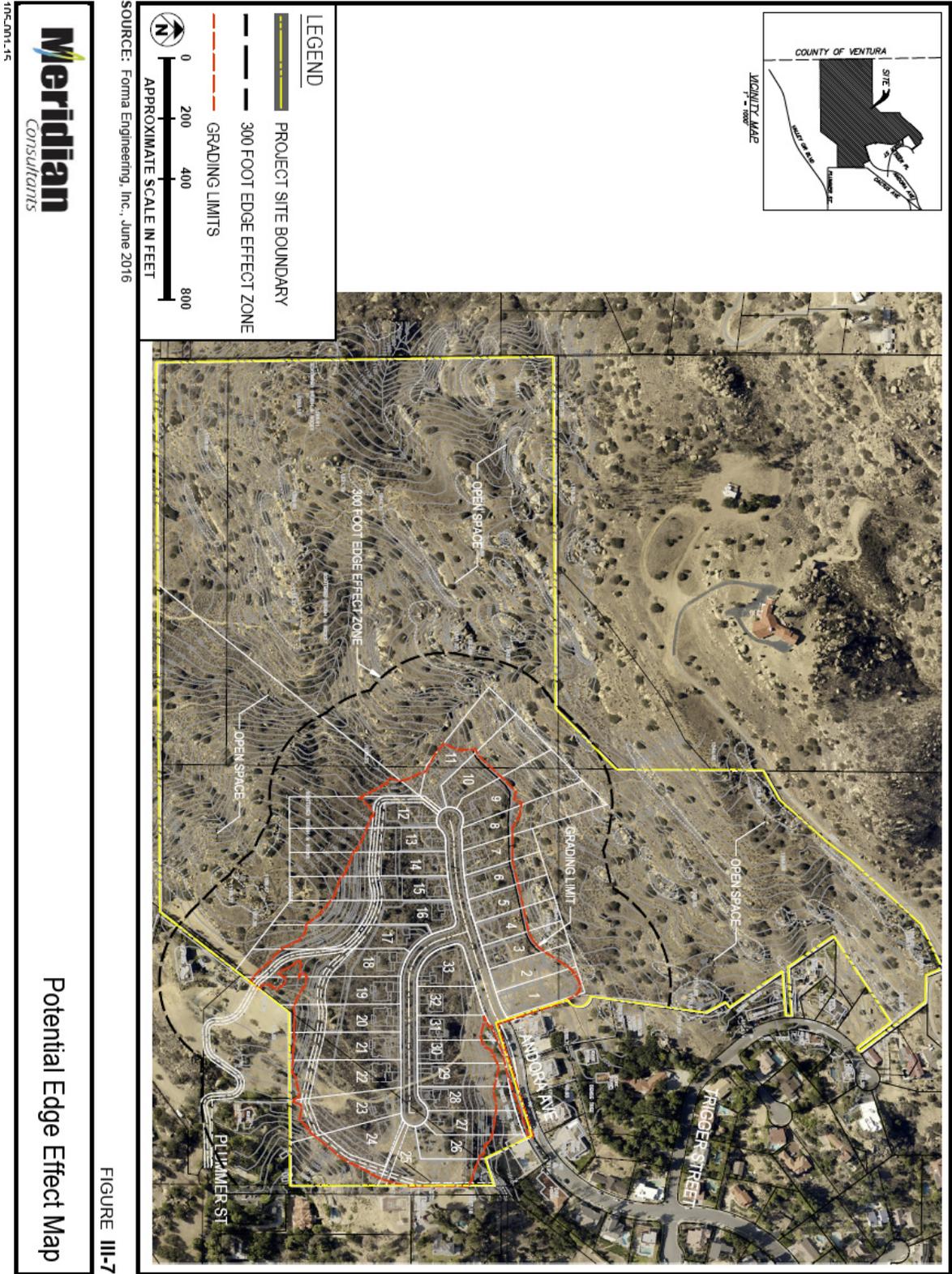
The appended FEIR-review notes further indicate deficiencies in study design, submitted by biologist Mark Osokow, Chair, San Fernando Valley Bird Observatory, San Fernando Valley Audubon Society.

CONCLUSIONS

We find indications in the FEIR that biological resource assessment, including that of special status birds, was not properly determined due to potentially inadequate survey design. Furthermore, we resolutely oppose degradation of a wildlife corridor vital to the Chatsworth Nature Preserve. This corridor is protected by the Chatsworth-Porter Ranch Community Plan, and we urge LA City Planners to enforce that protection by denying approval for the project proposal as currently configured.



1. FEIR Wildlife Linkages Map



2. FEIR Edge Effect Map

FEIR-review notes, submitted by Mark Osokow of San Fernando Valley Audubon Society

COMMENTS REGARDING APPENDIX H

GENERAL COMMENTS ON CONTENT

Appendix H contains the following paragraph:

"The Los Angeles County Santa Susana Mountains/Simi Hills SEA comprises only a small fraction of the actual Simi Hills connective habitat complex, almost all of which is within Ventura County. The 91-acre subject property appears to comprise the entire width of the SEA at its location within the SEA (additional habitat is present to the west, but it lies in Ventura County outside of SEA boundaries). The proposed project area, however, would only comprise approximately 70% of this relatively narrow width. As described in the Mitigation Measures below, the western portion of the property would be conserved; therefore, the western portion of the SEA width would also be conserved and left intact. Further, the 29 acres of affected SEA is even smaller when it is considered that the balance of the Simi Hills habitat complex is located in Ventura County to the west and outside of the Los Angeles County SEA. Most of the biological resources and functions present within the entire Simi Hills habitat complex, such as wildlife movement and habitat connectivity, would be left intact."

The document continually refers to "Chatsworth Reservoir." Thus, the consultant evidently fails to recognize that the property is a nature preserve, and the correct name for it is "Chatsworth Nature Preserve/Reservoir." Perhaps the consultant does not realize the property no longer serves as a reservoir. This repeated error reflects the consultant's lack of actual knowledge of the area. Such knowledge should have been gained from the experience of conducting regularly scheduled, thorough field investigations and contacts with individuals and organizations knowledgeable of the area. Instead, the consultant relied upon a few field visits involving superficial considerations for special status species supplemented by reference to a few documents of very questionable value.

Therefore, this document's reference to "Chatsworth Reservoir" as "open space" is, at best, misleading, as it fails to consider the vital functions of this open space as sensitive wildlife habitat supporting more than 200 species of birds, numerous reptiles and amphibians, rare plants, and significant cultural and historical sites. Thus, the document downplays the significance of the site on multiple levels and leads to further denigration of the project area's importance as a wildlife corridor.

In addition, the above quote is especially telling, wherein it is stated that "The proposed project area, however, would only comprise approximately 70% of this relatively narrow width." This is a very peculiar trivialization of the value of a fully functioning, full-sized wildlife corridor.

Based on the foregoing, all responses to comments pointing out the importance of the corridor to wildlife are based on false premises and are, therefore, effectively nullified. The EIR must not be certified or adopted based on erroneous information.

COMMENTS SPECIFIC TO BIRDS

Burrowing Owl observed at CNP on March 29, 2016. Likely to use the corridor for foraging. A Burrowing Owl was also sighted by three observers during the 2015 CBC on December 19, 2015, along the south berm of the former-reservoir basin.

Long-eared Owls observed on multiple occasions at CNP. Undoubtedly forage in the corridor.

Olive-sided Flycatcher has bred in Stone Canyon below Lower Stone Canyon Reservoir approximately 15 to 20 miles southeast; therefore, the Andora area is within the breeding range. There are XMAS Bird Count records for the species, as well as records from the Simi Hills at other times.

White-tailed Kite ordinarily present at CNP in fall/winter. Nests in Upper Las Virgenes Open Space Reserve on west side of Simi Hills. Undoubtedly uses Andora corridor for foraging, possibly for roosting, and nesting is not out of the question.

Merlin is likely to be present on the site. Although not detected on surveys, the western edges of the San Fernando Valley; including, CNP, Sage Ranch, and Woodland Hills Park are regular wintering and spring migration locations near Andora.

Loggerhead Shrike is likely to utilize the site and, although most likely in the fall, winter, and spring can be present at any season. The species is frequently observed at CNP and at SSFL, has bred at CNP, and breeding in the corridor is possible.

Osprey are occasionally observed at CNP, where they formerly fed on fish taken from the Ecology Pond. Assertions that the species are only found in proximity to large, fish bearing waters should be corrected. The species uses areas away from the water bodies to feed on the fish caught.

Yellow Warbler undoubtedly occurs on site. Appendix H shows it was detected during surveys, yet text states it was not. This contradiction should be resolved.

Gray Vireo probably occurs on site. There are local records for the species from Aliso Canyon in the southern foothills of the Santa Susana Mountains and numerous other locations.

Vaux's Swift uses area rock crevices and small caves for roosting and migrates in large numbers through the Simi Hills.