

DEPARTMENT OF FISH AND GAME

South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(619) 467-4201
FAX (619) 467-4239



March 7, 2002



Mr. Dan O'Donnell
City Planner
City of Los Angeles
6255 Van Nuys Boulevard
Van Nuys, California 91401

Dear Mr. O'Donnell:

**Canyon Trails (Red Tail) Golf and Equestrian Project
Big Tujunga Wash**

The Department of Fish and Game (Department) is writing to express our concerns regarding the changed project footprint shown on grading plans for the Canyon Trails Golf Course in Big Tujunga Wash. The project has pulled out of a 9.3 acre "island" on the north channel of Big Tujunga Wash and now extends into the area that was identified in the EIR as a preserve and mitigation for the State and federally-listed endangered slender-horned spineflower (*Dodecahema leptoceras*) and associated sensitive wildlife species which occur in intermediate-aged stands of Riversidean alluvial fan sage scrub. These species generally do not occur on the "island" which was mapped by the project's consultants as "barren wash".

This change in project footprint appears to be the result of the developer's revised golf course plan stemming from an arbitration panel decision relative to the Department's issuance of a Streambed Alteration Agreement. However, the Department does not support changes in the footprint that would reduce the size and alter the configuration of the approved spineflower preserve. This changed configuration is not consistent with the project as approved through an exhaustive CEQA process. We contend that the arbitration panel does not have the authority to override the CEQA process by placing a portion of the project on lands that were required for preservation pursuant to the CEQA process and associated City of Los Angeles conditions of approval.

Canyon Trail's revised project footprint as described on the grading plans increases impacts to the most diverse habitat in the wash, intermediate-aged alluvial scrub, which supports, inter-alia, endangered spineflower, potential spineflower seedbank, and sensitive wildlife species such as cactus wren, coastal whiptail, and San Diego horned lizard. The revised plans would increase adverse edge effects by reducing the size of the spineflower preserve by about nine acres and increasing the irregular edges of golf course that would extend like fingers into the preserve. The golf course will also be considerably closer to two of the four spineflower populations.

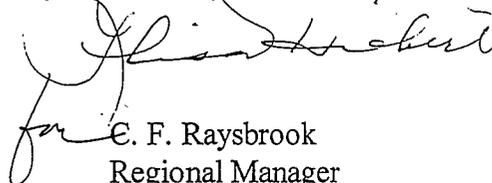
Mr. Dan O'Donnell
City of Los Angeles
March 7, 2002
Page 2

As noted, the Department finds that this proposed increase in golf course impacts to the spineflower preserve is inconsistent with the city-approved Mitigation Measure 38 which describes the required preserve as consisting, in part, of 57 acres of intermediate phase alluvial scrub. By reducing the size, shape and configuration of the previously-approved preserve, impacts to slender-horned spineflower and associated habitats and sensitive species are substantially more severe than evaluated in the previous CEQA review process. CEQA Section 15162 (2B) requires additional CEQA review when significant effects, previously examined, will be substantially more severe than shown in the approved EIR.

The Department therefore requests that the City of Los Angeles ensure that the Canyon Trails project not be allowed to encroach into the spineflower preserve/intermediate aged alluvial scrub area as described in Mitigation Measure 38, and that all grading and subsequent golf course features stay within the grading limit line evaluated throughout the CEQA process.

Thank you for consideration of our comments. Should you have any questions, please feel free to contact me at the letterhead address above.

Sincerely,



E. F. Raysbrook
Regional Manager
South Coast Region

cc: Department of Fish and Game:

Ron Rempel, Habitat Conservation-Sacramento
Morgan Wehtje, Environmental Services Supervisor-Camarillo
Mary Meyer, Plant Ecologist-Ojai
Ann Malcolm, Legal Affairs-Sacramento

MM:mm/sl

File: ~~CFR-Chron~~
HCP-Chron

file:staff\mmeyer\canyon Trails revised golf course footprint.wpd