Appendix A

Notice of Preparation

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE

South Coast Region
3883 Ruffin Road
San Diego CA 92123
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Notice of Preparation
of a Draft Supplemental Environmental Impact Report

Date: August 1, 2025

To: Responsible/Trustee Agencies and Interested Parties

From: California Department of Fish and Wildlife

Subject: Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report for Requested Incidental Take Permit for Crotch's Bumble Bee (State Clearinghouse No. 2002091018)

NOP Public Review Period: August 1, 2025, to September 2, 2025

The California Department of Fish and Wildlife (CDFW), as a responsible agency under the California Environmental Quality Act (CEQA), intends to prepare a Supplemental Environmental Impact Report (Supplemental EIR) for the potential issuance of an Incidental Take Permit (ITP) for Crotch's Bumble Bee (*Bombus crotchii*, and defined here as CBB) in connection with the development of the Canyon Hills Project (Project). The project applicant is Whitebird, Inc., doing business in California as California Whitebird, Inc. (Applicant).

In accordance with Section 15082 of the CEQA Guidelines, CDFW has prepared this Notice of Preparation (NOP) to provide the California Governor's Office of Land Use and Climate Innovation, any responsible and trustee agencies, and interested members of the public who submitted a request for such notices with information regarding the proposed ITP relating to the Project.

CDFW requests your written comments concerning the scope and content of the Supplemental EIR, including potential mitigation measures and alternatives to reduce the Project's potential environmental impact associated with issuance of the ITP. Comments must be submitted in writing according to directions below. If you represent a public agency, CDFW seeks written comments as to the scope and content of the environmental information in the Supplemental EIR that are germane to your agency's statutory responsibilities in connection with the proposed ITP relating to the Project.

In accordance with CEQA Guidelines Section 15082(b), there will be a 30-day period to comment on this NOP, beginning on August 1, 2025 and ending on September 2, 2025.

BACKGROUND: On October 19, 2005, the City Council of the City of Los Angeles (City Council) certified a Final Environmental Impact Report (Final EIR) for the Project and granted certain discretionary approvals for the Project. The approved Project includes 221 single-family residential lots, all of which are located on the north side of the I-210 Freeway. In May 2014, an Addendum to the Final EIR was prepared in connection with raising certain of the Project's street and pads.

PROJECT LOCATION: The development site for the Project (Project Site) includes approximately 300 acres of land and is located at 7000 La Tuna Canyon Road, Los Angeles, California, on the north side of the I-210 Freeway (I-210). The original project site included approximately 900 acres of land (Original Project Site) located on both sides of the I-210. The Project as originally proposed included 280 single-family homes. The reduced Project approved by the City Council included 221 single-family homes, all located on the Project Site on north side of the I-210, with all development eliminated on the portion of the Original Project Site located south of the I-210. The Applicant later recorded a conservation easement that permanently preserved all of the remaining approximately 600 acres within the Original Project Site (Public Open Space), including all of the entirety of the portion of the Original Project Site located south of the (I-210) and the western portion of the Original Project located north of the I-210. Fee title to the Public Open Space was then transferred to an affiliate of the Santa Monica Mountains Conservancy. See **Figure 1, Original Project Site and Regional Vicinity**, for the location of the Original Project Site within the context of the local area, and **Figure 2, Original Project Site, Current Project Site, and Public Open Space**, which shows the locations of the Original Project Site, the current Project Site and the Public Open Space.

PROJECT DESCRIPTION AND REQUESTED ACTION: The Applicant has filed an application with CDFW for an ITP under California Fish and Game Code Section 2081, subdivisions (b) and (c), a provision in the California Endangered Species Act, and Title 14 of the California Code of Regulations, Sections 783.0–783.8, to authorize the otherwise prohibited "take," as defined by State law, of one candidate wildlife species, the CBB, incidental to the development of approximately 164 acres of potentially occupied habitat for the CBB within the Project Site as part of the Project.

POTENTIAL ENVIRONMENTAL EFFECTS: Pursuant to CEQA Guidelines Section 15063(a), CDFW has elected to proceed directly to the preparation of a Draft Supplemental EIR rather than preparing an Initial Study.

CEQA Guidelines Section 15041(b) outlines the authority of a responsible agency, as compared to a lead agency, to impose mitigation measures for a project:

> *(b) When a public agency acts as a Responsible Agency for a project, the agency shall have more limited authority than a Lead Agency. The Responsible Agency may require changes in a project to lessen or avoid only the effects, either direct or indirect, of that part of the project which the agency will be called on to carry out or approve.*

CEQA Guidelines Section 15096(g)(1) includes a similar restriction:

> *(g) Adoption of Alternatives or Mitigation Measures.*
>
> *(1) When considering alternatives and mitigation measures, a Responsible Agency is more limited than a Lead Agency. A Responsible Agency has responsibility for mitigating or avoiding only the direct or indirect environmental effects of those parts of the project which it decides to carry out, finance, or approve.*

Therefore, the environmental review conducted by a responsible agency with respect to a discretionary approval must be limited to the environmental impacts within the scope of the discretionary approval before it. *See, e.g., Friends of Westwood, Inc. v. City of Los Angeles*, 191 Cal. App. 3d 259, 266-267, 272 (1987).

Accordingly, because CDFW is preparing the Draft Supplemental EIR associated with the potential issuance of an ITP for CBB, the Draft Supplemental EIR will focus solely on the Project's impact on the CBB.

SUBMITTING COMMENTS: CDFW will consider all written comments on the NOP regarding your views on how the potential issuance of the proposed ITP relating to the Project may affect the environment and the issues that should be addressed in the Draft Supplemental EIR. If you wish to submit written comments, please submit them no later than 5:00 p.m. on September 2, 2025 (the end of the 30-day comment period, which starts on August 1, 2025).

Your options for submitting comments are by U.S. mail or by email. Comments should include "Canyon Hills ITP – NOP Scoping Comments" in the subject line, and the name and physical address of the commenter should be contained in the body of the email or letter.

Please send all comments to:

California Department of Fish and Wildlife

Attention: Canyon Hills ITP – NOP Scoping Comments

Mailing Address: 3883 Ruffin Road, San Diego, CA 92123

OR by email: R5CEQA@wildlife.ca.gov (please include the subject line "Canyon Hills ITP – NOP Scoping Comments").

LOCATION OF DOCUMENTS AVAILABLE FOR PUBLIC REVIEW: The NOP will be available for review online at https://wildlife.ca.gov/Notices/CEQA. A hard copy of the NOP is available for review by appointment (appointments may be requested via email at R5CEQA@wildlife.ca.gov) at the CDFW South Coast Region Office, located at the following address:

CDFW South Coast Region Office
3883 Ruffin Road, San Diego, CA 92123

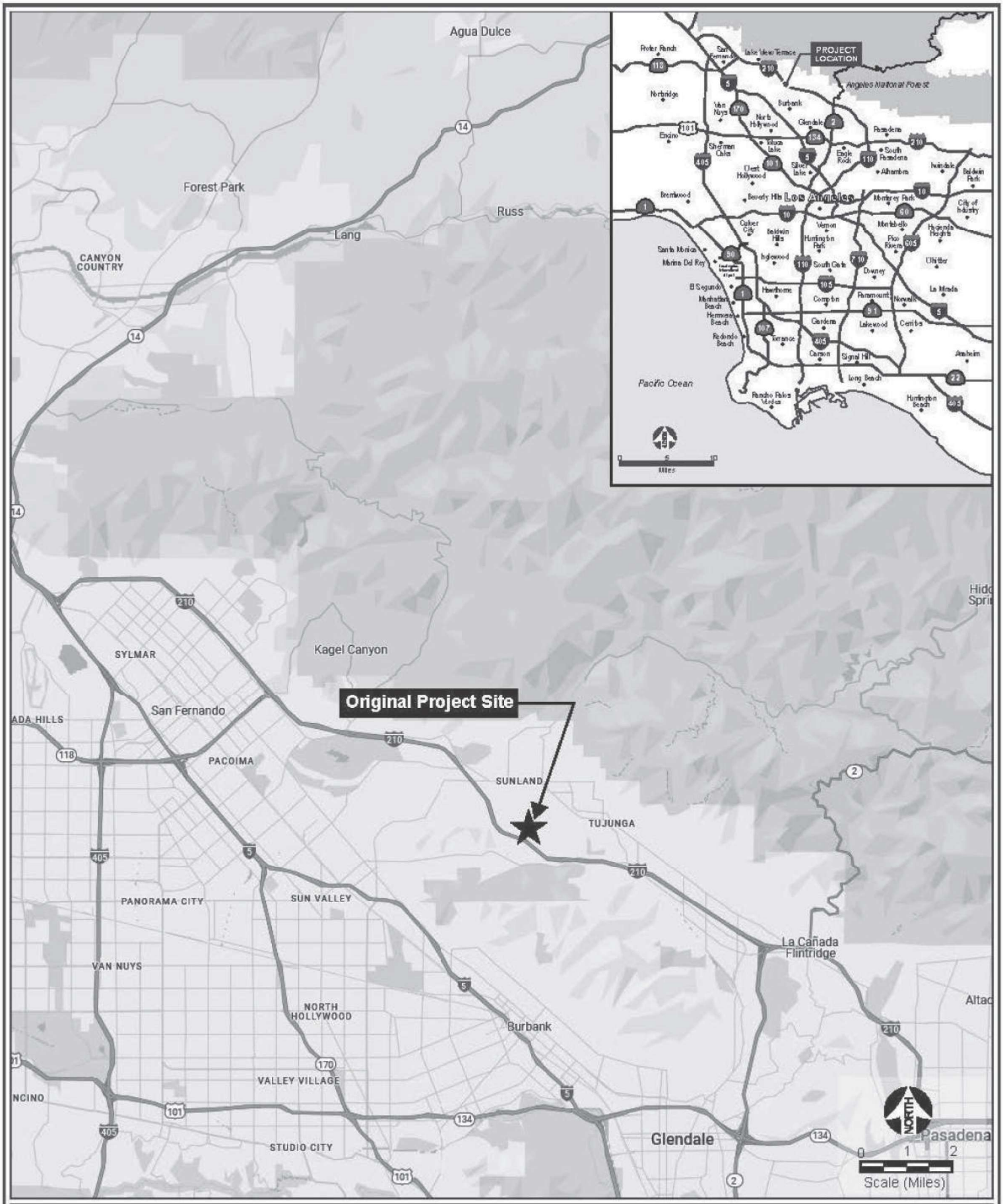

Figure 1
Original Project Site and Regional Vicinity

Source: Google Maps 2025.

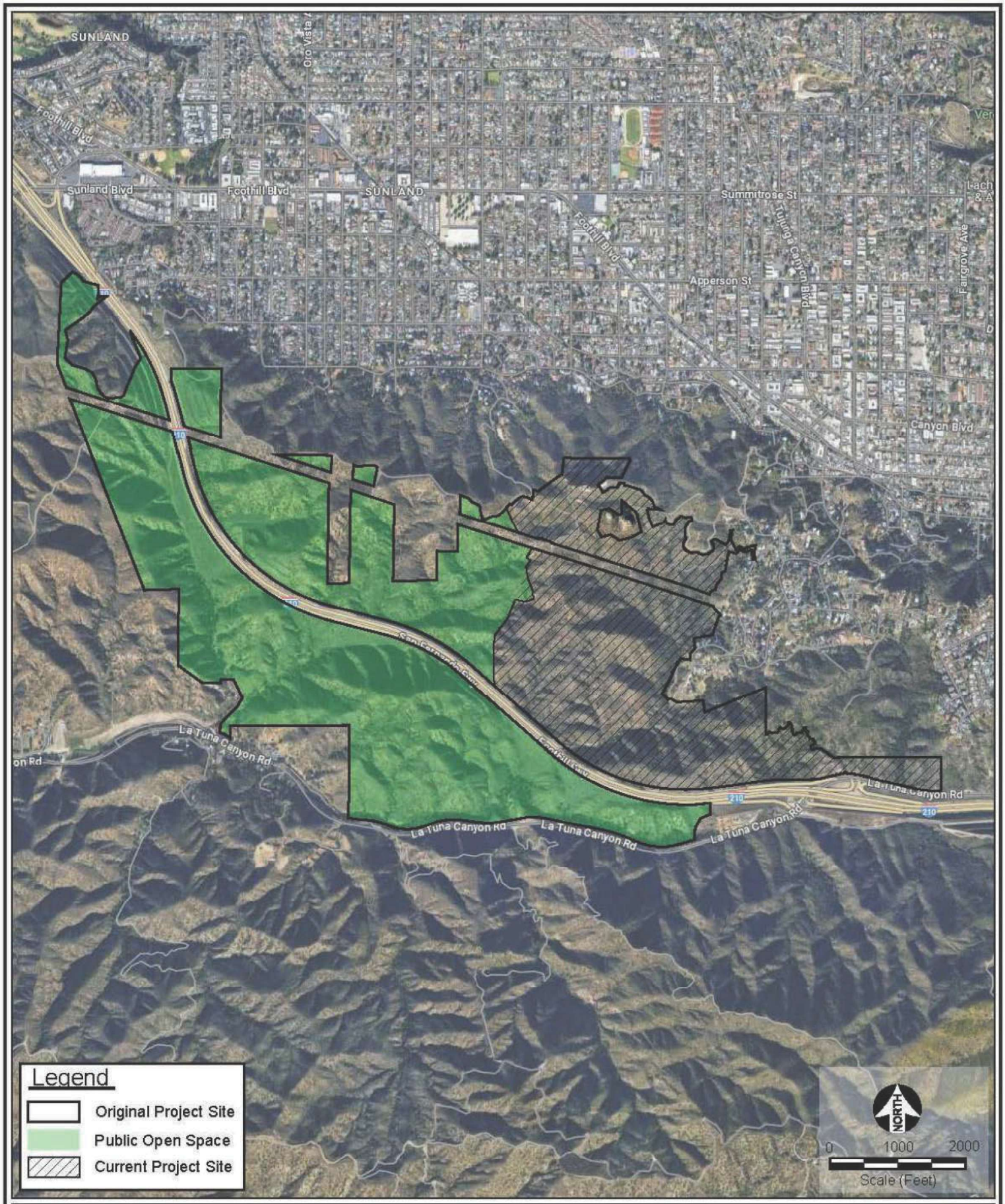

Figure 2
Original Project Site, Current Project Site, and Public Open Space

Source: Google Maps 2025.

Appendix B

Comment Letters in Response to NOP

From: "Abbey Campbell" <campbellabbeya@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/12/2025 8:03:38 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from campbellabbeya@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Abbey Campbell, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Abbey Campbell

From: "Abby Schultz" <abby07408@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/27/2025 11:21:54 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear
California Department of Fish and Wildlife,

My
name is Abby Schultz, and I am writing as a concerned resident
regarding
the Notice of Preparation (NOP) for the **Draft**
Supplemental Environmental Impact Report (SEIR)
related to the **Canyon**
Hills Project
and the proposed **Incidental**
Take Permit (ITP)
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While
the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental
conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire**
  risk and evacuation limitations

- in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

-

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Abby
Schultz

abby07408@gmail.com

From: "Abby Sessions" <abbysessions@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/12/2025 7:12:30 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Abby Sessions, and I am writing as a concerned resident of LA regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species**,
  including indirect impacts from habitat fragmentation and development

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Abigail Sessions

Resident of Eagle Rock Los Angeles

From: "Adam Gelbart" <adamgelbart@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/3/2025 5:57:42 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Adam Gelbart and I am writing regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

I'm thankful that CDFW is moving forward with an SEIR - this is a huge step in addressing the true impact of this development and the shortcomings of their 20 year old initial EIR. I became familiar with Crotch's Bee in the Verdugos, trying to observe, photograph, and learn about them as I saw them on hikes and walked through their habitat. It's an incredible species that I feel lucky to have seen so often, and I hope this SEIR ensures the safety of a species and habitat I love.

I think this is also an important window to reassess the impacts of this development. I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
- Presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Adam Gelbart

From: "Aidan Koch" <aidanalexiskoch@mailbox.org>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/1/2025 3:39:52 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Aidan Koch, and I am writing as a concerned resident of Southern California regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

My work as an artist and educator is deeply entrenched in local biodiversity and representing environmental issues. Living amid such a vast array of unique species, maintaining the balance of development and thriving diversity of wildlife is an incredibly delicate practice, but one of utmost importance. I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**

-
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Aidan Koch
58929 Landers CA
92285

From: "Akiko Crawford" <akikocrawford@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 9:07:29 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife

My name is Akiko Crawford and I am a resident of Tujunga.
So much gratitude for your decision on moving forward with the SEIR for the Canyon Hills Project. However I am concerned to find out that the report will be limited to the impact on the Crotch's Bumble Bee. The area is over 300 acres that is a habitat to many other wildlife such as the CA mountain lions. It is a vital part of the wildlife corridor and this development will surely sever the only safe passage in the area which will surely result in many more freeway fatalities of mountain lions and human encounters which will most likely lead to wildlife being euthanized. The land is also abundant with native plants and so many other species.

On top of negative ecological impact, the area is not equipped to handle anymore population - just one little car accident in the surrounding streets will cause a traffic jam. Imagine what kind of chaos it will bring if there is a fire.

Gated luxury housing will not solve the housing crisis in Los Angeles. We do not want our mountains lost just so a small group of folks can benefit monetarily.

But you already know all of this and probably getting an ear ful. I am just one resident that is concerned and rooting for Los Angeles to be a place that is successful in coexisting with wildlife, and honor the life of P-22. Once it's gone, it's irreversible. You have the power to make things right. Please reconsider to include the entire scope of the ecosystem in your report and prevent anymore destruction of our mountains.

Thank you for your time in advance.
Sincerely
Akiko Crawford

From: "A Nordz" <4nordz@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 5:19:48 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Email To: R5CEQA@wildlife.ca.gov
Subject Line: Canyon Hills ITP – NOP Scoping Comments

Dear California Department of Fish and Wildlife,

My name is Al Nordz and I am writing as a concerned resident, certified California Naturalist, and educator regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

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Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability
The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological

realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Al Nordz
Elysian Valley, Los Angeles CA
Community Nature Connection Alumni, Elysian Valley Riverside Neighborhood Council Board Member

"It is not enough to be busy. So are the ants. The question is: What are we busy about?" - Henry David Thoreau

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/26/2025 3:18:12 PM
Subject: FW: Bumblebee Support

From: Alexander Olson <aeolson58@gmail.com>
Sent: Monday, August 25, 2025 10:53 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Bumblebee Support

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Greetings,

I'd like to email you about my support in stopping the development company from building on the land in the Verdugo mountains where an endangered bee species, Crotch's Bumblebee, was discovered to be residing. In a time where we need all the pollinators we can get, we need to put an end to developing on land of ANY endangered species, especially ones such as this bee that are a crucial part of our suffering ecosystem.

Please halt the building and development of this land, and designate these sections of the Verdugo Mountains as a protected area of wilderness.

Thank you for seeking public comments. I hope this helps you decide to make the right choice.

Your local person,

-Alex

From: "Alexandra Tortora" <atortora@icloud.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 1:09:41 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Alexandra and I am writing as a concerned community member and nature lover regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Alexandra Barker

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 3:42:32 PM
Subject: FW: Canyon Hills ITP Comments

FYI

-----Original Message-----
From: Allison Miller <aallisonmiller@gmail.com>
Sent: Saturday, August 23, 2025 6:57 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP Comments

[You don't often get email from aallisonmiller@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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We need bees now more than ever — please, with all that is happening with the EPA- please help us do what we can to help nature. Bees are a huge part of that.

Please,
Allison Miller

From: "Alyssa Vance" <alyssavance@me.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 9:01:18 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from alyssavance@me.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Alyssa Vance, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Alyssa Vance

Sent from my iPhone

From: "andrea Harrell" <andy.harrell@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/29/2025 10:32:09 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Andrea Schrier and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Andrea Schrier

Andy.harrell@gmail.com

From: "Andi Whitcomb" <andrealorrainn@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 9:16:04 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from andrealorrainn@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Andrea Whitcomb

From: "A Pelayo" <lp3lay0@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 4:10:46 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Andres Pelayo, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills

Project.

Sincerely,
Andres Pelayo

From: "Andrew Shults" <andrewshults113@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/30/2025 4:47:25 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Andrew, and I am writing as a concerned resident and member of the outdoor industry regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species**,
  including indirect impacts from habitat fragmentation and development

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project

Sincerely,

--
Andrew James Shults
(323) 559-8512
andrewjamesshults.com

From: "Andrew Steiger" <andrew@tether-studio.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 4:46:47 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Andrew Steiger, and I am writing as a concerned earth citizen regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

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- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
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- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Andrew Steiger

Solano Canyon

Concerned citizen

Sent from my iPhone

From: "Angela Meza" <info@plantsporfavor.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 4:09:17 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from info@plantsporfavor.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is angela meza, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
angela meza

Angela Meza

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CESA" <R5CESA@wildlife.ca.gov>
Date: 8/20/2025 8:37:16 PM
Subject: FW: Canyon Hills ITP

Hello,

Please see email below.

Thank you.

California Department of Fish and Wildlife

South Coast – Region 5

3883 Ruffin Road

San Diego, CA 92123

P: (858) 467-4201

F: (858) 495-3614

In order to protect a customer's personally identifiable Information (PII), the CDFW license counter is required by management to use secured links for uploading and sending documents or applications containing sensitive customer information. You can call or e-mail to request this link be sent to you. **Any applications or documents sent through the ASKR5 e-mail containing PII will be immediately deleted, and you will be sent a secured link to upload them to.**

If you do not wish to use a secure link, you may also visit our office for processing during the hours of 8:00 – 4:00 Monday through Friday, or you can fax to (858) 495-3614.

Every Californian should conserve water. Find out how at:

Save Our Water

SaveOurWater.com · Drought.CA.gov

-----Original Message-----
From: angie rutan <angierutan@gmail.com>
Sent: Wednesday, August 20, 2025 1:34 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP

[You don't often get email from angierutan@gmail.com. Learn why this is important at https://aka.ms

/LearnAboutSenderIdentification]

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I know it is so hard to do the right thing sometimes. Especially in a capitalistic society where most bow to dollars and money is equated to power.
AND STILL, in the midst of what the eye can plainly see as catastrophic changes to our climate, we must be careful and make smart choices. Choices that will have incredible impact. Not just endangered bees, but multitudes of living species need this land. And frankly, humans need them to have the land. Our ecosystem relies on a delicate balance…without bees we have no food. And isn't food already expensive enough??

Indeed it IS all connected.

I beg of the decision makers to do the due diligence and learn that developing this land is absolutely the wrong choice.

((We can get in to why we don't need more housing, what is being done to provide the housing that is already available at affordable rates, and what can and should be done about "foreign investment" owning properties that sit vacant or are rented out at increased cost which in turn drives up prices overall….but right now let's just save this little pice of land))

Appreciate your time.
All the best □□
Angie

From: "Anna Moore" <pickledogmouse@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/4/2025 3:52:11 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,
My name is Anna Moore, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee. First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat. While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Disruption of critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Tribal Cultural Resources
- Utilities, energy, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.
Sincerely,
Anna Moore

From: "anne h." <badxducky@hotmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/23/2025 8:33:43 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Anne Hamilton, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

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Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability
The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Anne V. Hamilton

Get Outlook for Android

From: "Annette Mercer" <annette.l.mercer@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 4:13:42 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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The SEIR must include all impacts to any threatened, endangered, or species of concern, as well as impacts to their habitat.

Mapping of native vegetation as well as the current and historic ranges of the Crotch's bumblebee, mountain lion, and migratory birds should be done at a minimum.

Cumulative impacts from development on our biological resources must be addressed.

In addition, potential air quality and soil impacts due to wildfire in a developed area must be considered.

All proposed mitigation measures need to be funded and guaranteed for at least 5 years.

thank you

Annette Mercer
2647 Glendon Ave.
Los Angeles, CA. 90064

From: "Anthony Sebastian Garcia" <agarcia3@student.otis.edu>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/27/2025 11:22:38 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

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Dear California Department of Fish and Wildlife,
My name is Anthony Garcia, and I am writing as a concerned student studying nature in Los Angeles regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.
First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.
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Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.
Sincerely,

Anthony
OTIS College of Art and Design

From: "Ariel Hirsch" <arielhirsch10@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/24/2025 1:34:54 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Ariel Hirsch, and I am writing as a concerned Los Angeles resident and lover of nature, regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

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  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species**,
  including indirect impacts from habitat fragmentation and development

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Ariel Hirsch
Los Angeles Resident

--

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 7:03:38 PM
Subject: FW: Verdugo Hills - Stop the Build

FYI

California Department of Fish and Wildlife

South Coast – Region 5

3883 Ruffin Road

San Diego, CA 92123

P: (858) 467-4201

F: (858) 495-3614

Many licenses, permits and passes issued by CDFW can be purchased online, at a local license sales agent, or by phone at (800) 565-1458. For all other special license and permit types, please let us know so that we can provide information on alternative payment methods.

Every Californian should conserve water. Find out how at:



From: Arielle Berman <arielle@arielleberman.com>
Sent: Thursday, August 21, 2025 11:57 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Verdugo Hills - Stop the Build

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello,

I'm writing against the development of luxury homes in the Verdugo Hills. Not only for the risk this poses to endangered bees but this is also a high risk fire zone. Not every vacant hillside in California needs to be developed. We don't want to become a barren cityscape like so much of the East Coast and instead preserve our beautiful habitats that also contribute towards home value and tourism. It's shortsighted financially as well as environmentally. The fires tore through the homes of friends' families less than a year ago. We need to rethink the cityscape and what's safe and responsible for our environment and California residents.

xx

Arielle

--

ARIELLE BERMAN

Arielle Berman
Casting Director\u8195 |\u8195 Creative Services

+1 503-867-7227

ariellebermancasting.com
@arielleberman

From: "Barbara Goto" <barbaragoto@arroyosfoothills.org>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 7:27:06 PM
Subject: Canyon Hills ITP – NOP Scoping Comments
Attachments: Canyon HIlls Project letter 10-9-24.pdf

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To whom it may concern,

The attached letter is in comment to the Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report for Requested Incidental Take Permit for Crotch's Bumble Bee (State Clearinghouse No. 2002091018).

The letter was submitted by Arroyos & Foothills Conservancy on October 9, 2024 to request a new EIR for the Canyon Hills Project based upon the insufficiency of study of the CESA candidate species, Puma concolor, which has been documented on the project property. We respectfully request that the scope of this Supplemental Environmental Impact Report be expanded to include the impact of this project on this special status species.

Thank you,

Barbara Goto
Director of Operations
BarbaraGoto@arroyosfoothills.org
(818) 389-5563

Arroyos & Foothills CONSERVANCY
"Saving Habitat for Wildlife"
www.arroyosfoothills.org

Arroyos & Foothills
CONSERVANCY

P.O. BOX 1
PASADENA, CALIFORNIA 91102
WWW.ARROYOSFOOTHILLS.ORG
626.796.0782

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Communications/Development Coordinator

Ruby Siehl
Urban Wildlife Research Leader

10/9/2024

Tim Daly, CDFW Information Officer, South Coast Region: Tim.Daly@wildlife.ca.gov
Kevin Takei, Office of the General Counsel: Kevin.Takei@wildlife.ca.gov
California Department of Fish and Wildlife
South Coast Region Headquarters
3883 Ruffin Rd, San Diego, CA 92123

Re: Canyon Hills Project, 7000-8000 La Tuna Road

Dear California Department of Fish and Wildlife Staff,

Formed in 2000, the Arroyos & Foothills Conservancy (AFC) works with urgency to identify, conserve, enhance and steward critical natural habitats and wildlife corridors of the San Rafael Hills, Verdugo Mountains and foothills of the San Gabriel Mountains between Tujunga Wash and Altadena, and to link them to the Santa Monica Mountains at Griffith Park. Our overarching goal is to restore biodiversity throughout our Los Angeles region.

We understand that the Canyon Hills Project conducted an Environmental Impact Review in 2004. The original EIR states, "Mountain lions are not found in the Study Area [Project site] or any portion of the Verdugo Mountains. Therefore, regional movement by the mountain lion within or through the Study Area does not occur." We now know that CESA candidate species, *Puma concolor,* have been documented in the project area. Additionally, the project area functions as a critical chokepoint in wildlife passage within the Verdugo Mountains, allowing wildlife to access the underpass at La Tuna Canyon and avoid needing to traverse the 210 freeway.

With this evidence, we encourage CDFW to require a supplemental EIR to accurately assess the potential impacts on the environment this project would have.

Wildlife Corridor

Arroyos & Foothills Conservancy has been working with CDFW from our inception in 2000: we prepared the biological study that was adopted as the Altadena CAPP in 2008 and pursuant to it acquired land in Rubio in 2011 and Millard Canyon in 2012.

At CDFW's suggestion, and partial funding by the Santa Monica Mountains Conservancy, we initiated a CAPP for the Verdugo Mountains, San Rafael Hills and potential wildlife connectivity to the San Gabriel Mountains. Science & Collaboration for Connected Wildlands prepared the biological study which became the Eastern Rim of the Valley Conceptual Area Protection Plan in 2017.

In 2018, CDFW granted us Prop 1 funding to acquire a property serving as the only wildlife corridor in and out of the San Rafael Hills at the Arroyo Seco in Pasadena.

The Canyon Hills development lies in a critical wildlife passage area within the Eastern Rim of the Valley area - a regional wildlife movement, live-in habitat corridor and linkage complex that includes the Verdugo Mountains/San Rafael Hills (habitat core). The habitat core facilitates the maintenance of biological diversity and healthy populations of plants and wildlife by allowing genetic flow (movement) between the habitat core and other adjacent areas of large expanses of natural open space.

The Verdugo Mountains, including the area of the Canyon Hills development, are part of this habitat core - considered a sensitive resource by CDFW because they are largely surrounded by urbanization and is extremely vulnerable to continued fragmentation and local extirpations of wildlife species such as mountain lion that require large areas of habitat to sustain viable populations.

In comments to other Environmental Impact Reports in this corridor complex, CDFW previously recommended that any activity that could result in the reduction, fragmentation or other degradation of habitat value within the habitat core be considered significant under CEQA (CDFW letter to City of Pasadena Planning Division, May 9, 2018). In that letter, CDFW further recommended that "any proposed unavoidable impacts to the habitat core within the City's lead agency CEQA purview be subject to conditions that will further verify wildlife movement and other habitat use values. Habitat use and impact assessments should be informed by efforts to further document wildlife movement through the habitat core using techniques such as but not limited to camera and tracking stations and radio telemetry conducted, in our opinion, over at least a two-year period."

We encourage CDFW to require these assessments be done.

Mountain Lions

Over the past year and a half, remote wildlife cameras have documented at least two mountain lions using the development area, including predation on mule deer. [documentation by neighbors of the proposed Canyon Hills development area, along with wildlife photographer, Johanna Turner.] In addition, these two individuals have crossed into and possibly back out of the area south of the 210 freeway and La Tuna canyon. Additionally, Johanna Turner documented a new individual female puma in the Verdugos in 2024. This data was shared with CDFW and the City of Los Angeles in a September 11th letter from Doug Carstens.

Impacts to Mountain Lion: Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). The Project will increase human presence (e.g., new development, public trail access), traffic, and noise as well as artificial lighting during Project construction and over the life of the Project. Most factors affecting the ability of the southern California mountain lion populations to survive and reproduce are caused by humans (Yap et al. 2019). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). Areas of high human activity have lower occupancy of rare carnivores. Mountain lions tend to avoid roads and trials by the mere presence of those features, regardless of how much they are used (Lucas 2020). Increased traffic could cause vehicle strikes. As human population density increases, the probability of persistence of mountain lions decreases (Woodroffe 2000).

Protection under CESA: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit (ESU) of mountain lion in southern and central coastal California as threatened or endangered under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA.

Our research focuses mainly on mountain lions because of their important role as an umbrella species. As a keystone species, the mountain lion regulates populations of other species that, left unchecked, can lead to disruption of the landscape. As an umbrella species, their conservation results in many other species being conserved at the ecosystem or landscape level (Breckheimer, et. al 2014). Securing passage for mountain lions can ensure passage for all wildlife (Mountain Lion Foundation).

This Canyon Hills Project is located in a wildlife corridor where they have recently been documented sightings of a CESA candidate species on the project site. Because the project's impact on mountain lions was not studied under the original EIR and because this project will increase human presence and remove habitat used by mountain lions to live in and move through, in addition to other potentially negative impacts, we encourage the CDFW to order a new Environmental Impact Study examining the project's impact on this specially protected species.

Sincerely,



John Howell
Chief Executive Officer & General Counsel
(626) 796-0782

CDFW letter re: Canyon Hills October 9, 2024

CC:
Victoria.Tang@wildlife.ca.gov
Kelly.Schmoker@wildlife.ca.gov
jennifer.turner@wildlife.ca.gov
Steve.Gibson@wildlife.ca.gov
Erinn.Wilson-Olgin@wildlife.ca.gov
Heather.Pert@wildlife.ca.gov
Eriin.strelich@lacity.org
Maya.zaitzevsky@lacity.org
Vince.bertoni@lacity.org
Binh.phan@lacity.org

From: "Ashtin Arner" <ashtinarner@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/24/2025 5:00:25 AM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

As a California resident citizen I assert that NO supposed Benefits of the proposed "canyon hills project" of whitebird, Inc in sunland-tujunga would justify or outweigh the resulting negative environmental effects. This issue is of grave significance to the health of all beings in and around the effected area. PLEASE DO ANYTHING AND EVERYTHING YOU CAN TO STOP THE CANYON HILLS PROJECT, and provide any relevant resources for assistance

thanks, bless,,
Ash

From: "azalia snail" <azaliasnail@hotmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 7:28:09 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from azaliasnail@hotmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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As somebody who lives near the Verdugo mountains and drives the 210 daily, I would like to say that I think the Verdugo mountains housing project is a terrible idea.

Already we have immense fire danger, crazy traffic, tons of accidents on the 210…

I'm also concerned about the environmental impact since there are a lot of protected species that live in the mountains plus of course the vital bees.

I know thousands of other people that agree with me, but may not have time to write an email such as this one.

Thank you for your attention to this matter.

Signed,
Azalia West

sealed with flowers

From: "Beatriz Q" <bearoz.cia77@gmail.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/20/2025 6:58:28 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

You don't often get email from bearoz.cia77@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>

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Hi,

Protect the Crotch's bumblebee and its environment. Do not allow for the land of canyon hills to be become developed. We must protect endangered indigenous pollinators, they are invaluable to our lives, worth more than what any housing development can offer. There will be no housing if we have no pollinators!!!

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 10:56:58 PM
Subject: FW: Protect the bees!

Hi CEQA Team,

Please see the email below regarding the Crotch Bumblebee.

Thank you,

California Department of Fish and Wildlife

South Coast – Region 5

3883 Ruffin Road

San Diego, CA 92123

P: (858) 467-4201

F: (858) 495-3614

In order to protect a customer's personally identifiable Information (PII), the CDFW license counter is required by management to use secured links for uploading and sending documents or applications containing sensitive customer information. You can call or e-mail to request this link be sent to you. **Any applications or documents sent through the ASKR5 e-mail containing PII will be immediately deleted, and you will be sent a secured link to upload them to.**

If you do not wish to use a secure link, you may also visit our office for processing during the hours of 8:00 – 4:00 Monday through Friday, or you can fax to (858) 495-3614.

Every Californian should conserve water. Find out how at:

Save Our Water

SaveOurWater.com · Drought.CA.gov

-----Original Message-----
From: brp201@humboldt.edu <brp201@humboldt.edu>
Sent: Friday, August 22, 2025 3:51 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Protect the bees!

[You don't often get email from brp201@humboldt.edu. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Hello,

As a proud Angeleno I want you to know that we value diversity in our community. Diversity of humans and species, allowing high price real estate to be developed on lands with the Crotch's bumblebee will help destroy even more habitat in Southern California. We are already in a grid of private land and we should protect the few wild lands we have left. Please do not allow for this development to go through. We need the bees to pollinate our local plants which create favorable living conditions for all angelenos (humans, fauna, and flora). Please do the right thing.

Respectfully,
Bennett Perrault

From: "Beth Baker" <bethfbaker@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 6:20:25 PM
Subject: Canyon Hills development

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Greetings. I am a resident of Tujunga, CA, where the planned Canyon Hills development is located. I am writing to request additional environmental studies of the area. I have hiked in the location of the planned development for decades. I know that the area is vital to the region's wildlife. I have seen a mountain lion there on several occasions as well as a bobcat, a bear, several species of owls, hawks, and Crouch's bumblebee, a threatened species. I have noted a significant decrease in the amount of songbirds and insects in the area, perhaps a result of climate change. This means the ecosystem is already under great strain and the wildlife that lives in the area will be decimated, if not completely obliterated by the development. Furthermore, this is an extremely fire-prone area - specifically that hillside which overlooks the freeway and *frequently* catches fire from freeway accidents and cigarettes thrown out of car windows. It really is insanity to build new construction there; new home buyers will not be able to purchase insurance and they will be subject to very regular fires. Building luxury estates on open land is a stupid way to develop more housing. There are dozens of abandoned buildings and empty lots in the neighborhood that should be developed - not the limited open space. Please help protect our wildlife and require additional environmental testing of the site. Thank you.

Regards

Beth Baker
9520 Amoret Drive
Tujunga, CA 91042

From: "Beverly ONeill" <bevoneill22@ca.rr.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/1/2025 6:40:36 PM
Subject: Canyon Hills ITP-NOP Scoping Comments

[You don't often get email from bevoneill22@ca.rr.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To whom it may concern, We are writing to oppose the Canyon Hills development project. We have lived in Tujunga since 1952 and the amount of lost open space since that year is incredible!!, This was a very rural community with wildlife abounding but now the housing density is disgusting and our community doesn't even begin to resemble what once was and why people moved here. Tujunga Canyon Blvd. is already severely impacted with traffic and accidents a frequent occurrence. Our quality of life has deteriorated significantly. No more roadrunners,quail, horned toads, etc.which used to be everywhere. Why in the world would a developer be allowed to build more homes in the fire prone hills??!? Please don't let this encroachment on our open space happen! Sincerely and respectfully submitted, Dan and Beverly O'Neill

From: "Blake Mills" <blake.mills@me.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 4:42:49 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Blake Mills, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am very concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**

- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of the wider scope of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Blake Mills

3021 E Chevy Chase Dr. Glendale, CA 91206

From: "Brenda Davidge" <brenda.davidge@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/27/2025 3:29:24 AM
Subject: Concerns About Canyon Hills Development – Request for Additional Environmental Testing

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Dear California Department of Fish and Wildlife,

I am a recent resident of Tujunga after being displaced and losing my home in the Eaton Fire. I am writing out of deep concern for Verdugo Mountains, where the Canyon Hills development is being proposed and the wildlife that depend on it. Over the last few months since I've been here I have seen bobcats, coyotes, hawks, quails, finches, owls, and even Crotch's bumblebee- a threatened species now recognized as vital to the health of native plants and the resilience of our ecosystems.

The environmental review originally done for this project was completed more than 20 years ago, in 2003. Much has changed since then including but not limited to wildlife patterns, climate conditions, and the intensity of wildfire risk in this region. The La Tuna Fire of 2017, which swept through nearby hillsides, is just one recent reminder that this is one of the most fire-prone areas in Southern California. In fact it is even more fire prone than where my previous house in Altadena was. The particular slope above the freeway has caught fire repeatedly, often from accidents or something as small as a cigarette tossed from a car window. To put new luxury homes there, in the direct path of regular wildfire, seems not only reckless for the future residents but disastrous for the fragile open space and habitat that remain.

There is also a broader issue of priorities. There are vacant buildings and underused lots across our neighborhoods that could be revitalized for housing. It makes little sense to destroy one of the last undeveloped stretches of open land in the Verdugos when safer and more sustainable options exist. Once this land is gone, it is gone forever affecting the mountain lions, the pollinators, the owls, and all the other species that have managed to survive there despite mounting pressures.

I am asking the Department to require additional, comprehensive environmental testing for Canyon Hills. It is not enough to focus on one species alone. We need a full, updated study of the area's biodiversity, fire risks, and cultural significance, and an honest assessment of whether this project can truly be justified in light of what we now know and have experiences with the fires of Jan 2025.

Please help protect the Verdugo Mountains, not just for the people who live nearby, but for the wildlife who have no alternative home, and for future generations who deserve to experience wild open space in Los Angeles.

Thank you for your time and consideration.

Sincerely,
Brenda Davidge

Tujunga, CA

From: "Brigitte Barrettt" <brigitte0106@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 12:08:57 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from brigitte0106@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Brigitte Barrett, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Brigitte Barrett

From: "Bryan Matsumoto" <bmotzbmotz@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 9:53:28 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Bryan Matsumoto. I am writing as a concerned Los Angeles County Watershed Area Steering Committee Member,* senior project manager with a Masters in Landscape Architecture, environmental justice educator, community hike leader and resident, regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

It's obvious that the entire scope of severe negative impacts to this area needs to be evaluated for truthful accountability!

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, CDFW must expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

-

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment.

We are depending on you -- CDFW -- to fulfill your role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

IF NOT YOU, WHO?

With sincere thanks,

Bryan Matsumoto

8841 Longden Ave.

Temple City, CA 91780

(Senior Project Manager, Nature for All - but writing with my own personal thoughts, not representing my organization)

* Los Angeles County Safe Clean Water Program, Rio Hondo Watershed Area Steering Committee Member

bmotzbmotz@gmail.com

626-246-8634

From: "Brynna Campbell" <brynnacampbell@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 1:42:46 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish
and Wildlife,

My
name is Brynna Campbell,
and I am writing as a concerned California Naturalist and Los Angeles resident
regarding the Notice of Preparation (NOP) for the **Draft**
Supplemental Environmental Impact Report (SEIR)
related to the **Canyon**
Hills Project and the proposed
Incidental Take Permit (ITP)
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
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despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

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the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental
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- **Wildfire risk and evacuation limitations**
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-

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**

- **Tribal Cultural Resources**

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- **Climate resilience and long-term ecological sustainability**

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and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Brynna Campbell

8857 Katherine Ave, Panorama City

brynnacampbell@gmail.com

CA Naturalist

From: "Cameron Rosas" <cledbetter1360@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 12:27:16 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Cameron Rosas , and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills

Project.

Sincerely,
Cameron Rosas

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 3:04:16 PM
Subject: FW: Canyon Hills development

From: toxicbeef@icloud.com <toxicbeef@icloud.com>
Sent: Friday, August 22, 2025 1:33 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills development

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Greetings. I am a resident of Tujunga, CA, where the planned Canyon Hills development is located. I am writing to request additional environmental studies of the area. I have hiked in the location of the planned development for decades. I know that the area is vital to the region's wildlife. I have seen a mountain lion there on several occasions as well as a bobcat, a bear, several species of owls, hawks, and Crouch's bumblebee, a threatened species. I have noted a significant decrease in the amount of songbirds and insects in the area, perhaps a result of climate change. This means the ecosystem is already under great strain and the wildlife that lives in the area will be decimated, if not completely obliterated by the development. Furthermore, this is an extremely fire-prone area - specifically that hillside which overlooks the freeway and *frequently* catches fire from freeway accidents and cigarettes thrown out of car windows. It really is insanity to build new construction there; new home buyers will not be able to purchase insurance and they will be subject to very regular fires. Building luxury estates on open land is a stupid way to develop more housing. There are dozens of abandoned buildings and empty lots in the neighborhood that should be developed - not the limited open space. Please help protect our wildlife and require additional environmental testing of the site. Thank you.

Regards,

- Carlos Cristales

Sent from my iPhone

From: "Caroline Tassi" <carolinevtassi@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 4:52:53 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Caroline Tassi, and I am writing as a concerned resident and hiker regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species,**
  including indirect impacts from habitat fragmentation and development
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Caroline Tassi
606 N Ave 66, 9 Los Angeles, CA 90042
Carolinevtassi@gmail.com

From: "Cassi Mulcahy" <cassandrashay7@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 3:31:13 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,
My name is Cassandra Mulcahy, and I am writing as a concerned resi dent regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permi t (ITP) for Crotch's Bumble Bee. First, I want to thank CDFW for m oving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental a nalysis of a project first approved over 20 years ago. This SEIR o ffers a long-overdue opportunity to reassess the full environmenta l impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zo nes. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impac ts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat. While the role of a "respo nsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especiall y given the significant changes in environmental conditions and pu blic understanding since the original EIR was drafted (2003). Thes e include: - Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ) - Presence of CESA-li sted California mountain lions (Puma concolor) - Disruption of cri tical wildlife corridor (I-210 Freeway crossing) - Cumulative impa cts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development - Tribal Cultur al Resources - Utilities, energy, and greenhouse gas emissions - C limate resilience and long-term ecological sustainability Thank yo u for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and f ully evaluate the ecological consequences of the Canyon Hills Proj ect. Sincerely, Cassandra Mulcahy

--
Cassandra Mulcahy
(267)614-9948

From: "Catherine Wootton" <cwootton@student.mtsac.edu>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/31/2025 9:03:32 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,
My name is Catherine, and I am writing to you regarding the Canyon Hills Project and the devastating impact it will have on the wildlife of the Verdugo, including the Crotch's Bumble Bee.
I am currently a resident of LA County and a student pursuing a career in environmental conservation and animal biology. Thus, I am concerned about the project's prospect of taking up and destroying 300 acres of critical wildland, 160 acres of which belong to the endangered Crotch Bumble Bee.
There is also concern regarding how much our environment and climate have changed in the 20 years since this plan was drafted. We are seeing more violent wildfires, which this area would be at high risk of if construction were to take place, as well as the ecological sustainability, as construction would heavily disrupt the delicate ecosystem operation in the hills. There is also the disruption of the critical wildlife corridor and the presence of the CESA-listed California mountain lions.
The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.
Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.
Sincerely,
Catherine Wootton
Student at Mt. San Antonio, Walnut, California

From: "Sofia Prado-Irwin" <spradoirwin@biologicaldiversity.org>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 2:00:00 PM
Subject: Canyon Hills ITP - NOP Scoping Comments
Attachments: CBD_Comments_CanyonHills_09022025.pdf

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Good morning,
Please accept these comments submitted on behalf of the Center for Biological Diversity regarding Canyon Hills ITP - NOP Scoping Comments, SCH #2002091018. Please add me to the notice list for any future updates.

Please confirm receipt of the attached letter and of the references included in the following OneDrive link:
Canyon Hills References

Thank you,
Sofia

Sofia Prado-Irwin, PhD
pronouns: she/her/hers
Staff Scientist
Urban Wildlands Program
Center for Biological Diversity
spradoirwin@biologicaldiversity.org
(510) 844-7100 x548

September 2, 2025

Sent via email, References shared via OneDrive

California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123
R5CEQA@wildlife.ca.gov

Re: Canyon Hills ITP – NOP Scoping Comments, SCH No. 2002091018

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Notice of Preparation ("NOP") of a Draft Supplemental Environmental Impact Report ("DSEIR") for the requested Incidental Take Permit for Crotch's Bumble Bee in connection with the development of the proposed Canyon Hills Project ("Project"). Since the original EIR was certified in 2005, new information regarding Crotch's bumble bee has emerged, including the species' advancement to candidate status under the California Endangered Species Act ("CESA") and the observation of Crotch's bumble bee in the Project area. We appreciate that the California Department of Fish and Wildlife ("CDFW") will be preparing a DSEIR to analyze impacts to this species.

However, new information has also emerged on mountain lion, wildfire risk, and carbon sequestration since 2005. Mountain lion were advanced to candidacy under CESA in 2020, which the 2005 EIR of course does not account for. A significant amount of research conducted after 2005 demonstrates that the mountain lion populations in the Project area are facing an extinction vortex driven by habitat fragmentation, vehicle strikes, rodenticide poisoning, disease, and other causes. Additionally, new research on wildfire has demonstrated that sprawl development in the wildland-urban interface ("WUI") increases wildfire risk, endangers new and existing residents, and contributes to a feedback loop of increased wildfire and loss of biodiversity. Finally, new research on the importance of carbon sequestration by native habitats has emerged, highlighting the important role of existing vegetation in the cycle of greenhouse gas emissions.

Because the EIR was certified in 2005, these issues were not fully addressed. The California Environmental Quality Act ("CEQA") provides that a subsequent or supplemental EIR may be required when either (1) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report or (2) new information, which was not known and could not have

been known at the time the environmental impact report was certified as complete, becomes available. (Pub. Res. Code § 21166.). The NOP indicates that the DSEIR will analyze only impacts to Crotch's bumble bee. However, due to the emergence of significant new information, regarding mountain lion, wildfire, and greenhouse gas emissions since the original EIR was certified, these impacts should be analyzed in the DSEIR as well.

In particular, we urge CDFW to analyze how the Project will impact vulnerable mountain lion populations and provide mitigation measures and alternatives for any impacts; fully analyze the wildfire risk of the Project; and fully analyze the impacts of the Project on greenhouse gas emissions, particularly the loss of carbon sequestration that would result from Project construction. Inclusion of these issues in the DSEIR would allow for informed decision-making, including whether large-scale development in this location is in the public interest.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles and the surrounding region.

I. The DSEIR Must Fully Analyze and Mitigate Impacts to Crotch's Bumble Bee and Habitat.

Bumble bees are integral members of native ecosystems, not only due to their pollination services but for their roles in the food web, nutrient cycling and decomposition, and pest control (R. G. Hatfield & Jepsen, 2021). They pollinate countless native plants as well as many crops, playing an important role in both ecosystem health and agriculture (Cameron et al., 2011). Unfortunately, numerous bumble bees have experienced significant declines in recent decades due to multiple factors including novel pathogens, habitat loss, and pesticides (Cameron et al., 2011; Colla et al., 2012; Goulson et al., 2015).

Crotch's bumble bee is one such species. Their populations have plummeted over the last few decades, largely due to habitat loss and modification, among other factors (R. Hatfield et al., 2018). Once widespread across the Central Vally and much of southern California, Crotch's bumble bee is now rare, and primarily restricted to xeric and coastal sites in southwestern California, like the proposed Project site (Fisher et al., 2022; R. Hatfield et al., 2018). The species (along with three other bumble bees) was granted "candidate" status under CESA in 2022.

The DSEIR must consider all of these factors in its analysis. The DSEIR must provide a thorough assessment of Crotch's bumble bee presence as well as suitable habitat on the Project site. If impacts to the species are expected, the DSEIR must determine how the Project can

avoid, minimize, and mitigate these impacts. To that end, the DSEIR should include an alternatives analysis with at least one alternative evaluating the reduction of impacts to this rare species by moving the project away from the Crotch's bumble bee habitat. Additionally, acquisition lands should be required as part of the mitigation to compensate for loss of Crotch's bumble bee nesting and foraging habitat and will need to be managed in perpetuity for conservation. Mitigation lands should be high-quality habitat and, at minimum 5:1 mitigation should be provided of all acres of Crotch's bumble bee habitat destroyed.

The DSEIR must also take into account the fact that habitat loss and species displacement from construction of the proposed Project are immediate, while any gains from their mitigation are uncertain. Moilanen et al. (2009) found that "very high offset ratios may be needed to guarantee a robustly fair exchange" and that "considerations of uncertainty, correlated success/failure, and time discounting should be included in the determination of the offset ratio to avoid a significant risk that the exchange is unfavorable for conservation in the long run." Restoring complex ecosystems often results in reduced ecological function, so high mitigation ratios and adequate monitoring are necessary, but not sufficient, to ensure success.

Multiple scientific studies specifically address the need for higher mitigation ratios (along with long-term monitoring, identified and measurable success criteria, and adaptive management strategies) to improve chances of adequately mitigating impacts to habitats and species (Matthews & Endress, 2008; Mitsch & Wilson, 1996; Moilanen et al., 2009; Stein et al., 2018; Sudol & Ambrose, 2002; Windmiller & Calhoun, 2007; Zedler & Callaway, 1999) found that "very high offset ratios may be needed to guarantee a robustly fair exchange" and that "considerations of uncertainty, correlated success/failure, and time discounting should be included in the determination of the offset ratio to avoid a significant risk that the exchange is unfavorable for conservation in the long run." The preservation of high-quality habitat in and near the Project area should be prioritized, the minimum acreage of habitat mitigation should be greater if habitat is being restored or created, and mitigation should be planned in a way that is protective from edge effects and fragmentation to improve the probability of ecologically functional mitigation. Created and restored habitat mitigation ratios should be much higher than preservation mitigation ratios, and they should be coupled with extended years of effective monitoring and adaptive management strategies (Ambrose et al., 2006; Moilanen et al., 2009; Sudol & Ambrose, 2002). Scientists recommend 15-20 years or more of monitoring and adaptive management to determine the success, or lack thereof, of enhanced, restored, or created habitat (Mitsch & Wilson, 1996; Zedler & Callaway, 1999).

Finally, the DSEIR must include a detailed analysis of the cumulative impacts of the Project together with other completed, current, and reasonably foreseeable development projects in the area.

II. Given Significant New Information, The DSEIR Must Include Analysis and Mitigation of Impacts to Mountain Lion

Significant new information regarding the status and threats to southern California mountain lions has emerged since the EIR was certified in 2005. Mountain lions in the Project area are part of the San Gabriel/San Bernardino Mountains population, which were granted "candidacy status" in April 2020 under CESA, such that they are afforded the same protections as other CESA-listed species. CEQA requires a "mandatory finding of significance" when a project has the potential to impact a CESA-listed species. (CEQA Guidelines § 15065(a)(1); *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 792 fn. 12.) And such a finding triggers a duty to consider and adopt all feasible alternatives or mitigation measures to reduce such impacts. (Pub. Res. Code § 21002.) Moreover CESA provides that agencies should not approve projects that could jeopardize the continued existence of this population or result in destruction of essential habitat (Fish & Game Code § 2053(a)) and agencies must require that appropriate mitigation measures be implemented for projects that could destroy mountain lion habitat or impair connectivity (See Fish & Game Code § 2054).

Finally, mountain lions have recently been spotted in the vicinity of the Project area. There is widespread evidence that mountain lions inhabit the Verdugo Mountains as well as the San Gabriel Mountains (Erikson, 2022; Kuykendall, 2015; Kuykendall & Hughan, 2017). Indeed, the National Park Service documented that a mountain lion was killed by a vehicle strike in 2015 by the La Tuna Canyon underpass near the Project area. A map published by the National Park Service listing the location of the vehicle strike is included as Exhibit 1. The 2005 EIR does not address these issues, so the DSEIR must include analyses and mitigation for impacts to mountain lions.

a. Recent Studies Reveal That Mountain Lions in the Project Area are Threatened

Continued habitat loss and fragmentation has led to 10 genetically isolated mountain lion populations within California (Gustafson et al., 2018, 2021). There are six identified mountain lion populations in the Southern California and Central Coast Evolutionarily Significant Unit ("ESU"), and several are facing an extinction vortex due to high levels of inbreeding, low genetic diversity, high human-caused mortality rates from car strikes on roads, depredation kills, rodenticide poisoning, poaching, disease, and increased human-caused wildfires (Benson et al., 2016, 2019; Ernest et al., 2003, 2014; Gustafson et al., 2021; Riley et al., 2014; Vickers et al., 2015).

The effective population sizes (N_e) of the six populations within the ESU range from 2.3 to 26.9 (Gustafson et al., 2021). An effective population size (N_e) of 50 is assumed to be sufficient to prevent inbreeding depression over five generations, while an effective population

size of 500 is considered sufficient to retain evolutionary potential in perpetuity (Frankham et al., 2014; Traill et al., 2010). Five of the six populations are well below that minimum threshold of 50 and none have an effective population size anywhere near 500, which indicates that these populations are at serious risk of becoming extirpated. Low genetic diversity and high human-caused mortalities are driving local mountain lions in the Santa Monica and Santa Ana mountains towards an extinction vortex (Gustafson et al., 2018). Scientists predict that these populations are likely to become extinct within 50 years if gene flow with other mountain lion populations is not improved (Benson et al., 2016, 2019; Gustafson et al., 2021). This is detailed in the Center's petition to the California Fish and Game Commission to protect Southern California and Central Coast mountain lions under the California Endangered Species Act (Yap et al., 2019).

The Project area is located between the San Gabriel/San Bernardino ("SGSB") population and the Central Coast South ("CCS") population nearby to the west. Scientists have documented physical and reproductive signs of inbreeding depression in local mountain lions due to being boxed in by roads and development (Huffmeyer et al., 2021). Researchers have found that, of the California mountain lion subpopulations, the SGSB population has the smallest effective population size and the smallest area of available habitat (Dellinger et al., 2020; Gustafson et al., 2021). Scientists suggest that the SGSB population "may be approaching levels of genetic drift and inbreeding similar to the well-monitored and genetically depauperate Santa Ana and Central Coast South populations (Ernest et al., 2014; Gustafson et al., 2017; Riley et al., 2014)" (Gustafson et al., 2021), which are predicted to have a 99% chance of becoming locally extinct within 50 years if inbreeding depression occurs. (Benson et al., 2019). This emphasizes the importance of protecting the remaining SGSB population, specifically through maintaining and enhancing connectivity among and between the subpopulations, as well as preserving habitat.

Numerous studies highlight the impacts of human activities on mountain lions. Human-caused mortalities—including vehicle strikes, rodenticide poisoning, depredation kills, poaching, and wildfire—are the leading cause of death for mountain lions across California, exceeding natural mortality rates (Benson et al., 2023; Benson, Sikich, et al., 2020; Nisi et al., 2023; Vickers et al., 2015). In addition, human activities also alter these large carnivores' behavior in ways that likely further impede important movement and gene flow. For example, researchers found that mountain lions are so fearful of humans and noise generated by humans that they will abandon the carcass of a deer and forgo the feeding opportunity just to avoid humans (J. A. Smith et al., 2017). The authors concluded that even "non-consumptive forms of human disturbance may alter the ecological role of large carnivores by affecting the link between these top predators and their prey" (J. A. Smith et al., 2017). In addition, mountain lions have been found to respond fearfully upon hearing human vocalizations, avoiding the area and moving more cautiously when hearing humans (J. A. Smith et al., 2017; Suraci et al., 2019).

Other studies have demonstrated other shifts in behavior and movement patterns of pumas in response to human activities, like increased avoidance behavior in areas with more roads and higher development densities and increased nocturnal activity as human presence increases (Bolas et al., 2025; Dougherty et al., 2025; Lucas, 2020; Nickel et al., 2020, 2021; Nisi et al., 2022, 2023; J. A. Smith et al., 2015, 2019; Y. Wang et al., 2017; Wilmers et al., 2013, 2021; Yovovich et al., 2020). Pumas have also been found to generally avoid areas with nearby night lighting (Barrientos et al., 2023). Thus, the increased human presence due to the Project's new roads and development could have significant negative impacts on puma survival and behavior, which could reduce the genetic health of the local population and ultimately diminish the long-term survival of the SGSB population.

Human activities can also affect mountain lion communication and reproductive behaviors that are important for their survival (Yovovich et al., 2020). Males prefer to use relatively flat areas away from human influence as scrape sites to delineate territories as well as attract potential mates (Allen et al., 2015, 2016; Yovovich et al., 2020). Similarly, when nursing females (with kittens less than 8 weeks old) shrink their home ranges to an average of 9 km^2 while their young were most vulnerable, they prefer undeveloped lands away from human disturbance, opting for habitat with protective cover and sufficient water and prey availability (Yovovich et al., 2020). The loss of adequate undisturbed communication and nursery habitat could disrupt important communication and reproductive behaviors that facilitate social structure and overall survival.

In a study conducted from 2002 to 2019 in the Central Coast South (CC-S) puma population scientists found high human-caused mortality rates in puma adults and high intraspecific mortalities among subadults (Benson, Sikich, et al., 2020). Most known causes of death among adults and subadults (14/20) were directly human-caused: vehicle strikes, rodenticide poisoning, poaching, and wildfire. The remaining six known (6/20) causes of deaths were intraspecific killing (Benson, Sikich, et al., 2020). And while intraspecific killings have been documented to naturally occur in mountain lion populations, it was likely exacerbated in the Santa Monica Mountains with the presence of significant movement barriers that prevent subadults from being able to adequately disperse, which likely led to increased conflicts with territorial males (Benson, Sikich, et al., 2020; Riley et al., 2014). The Santa Monica Mountains puma population is relatively small, extremely isolated, and geographically limited. This highlights the need to reduce human-caused mortalities, in part, by protecting existing intact habitats and improving connectivity within and between subpopulations.

Numerous scientific studies on the profound impacts of human activities and infrastructure on mountain lion survival emphasize the need to adequately assess and mitigate impacts to these CESA candidate species in the Project area. These studies add to the accumulating evidence that mountain lions require a habitat mosaic that provides sufficient room to roam away from human-disturbed areas and connected to expansive, intact, heterogeneous

habitats (Dickson et al., 2005; Dickson & Beier, 2002; Kertson et al., 2011; Zeller et al., 2017). Continued construction of roads and development in mountain lion habitat with little regard for their movement and behavioral needs has direct and indirect lethal and sublethal impacts that threaten the persistence of Southern California and Central Coast puma populations. CEQA therefore requires that the DSEIR analyze these potential impacts.

Mountain lions are also a key indicator species of wildlife connectivity and healthy ecosystems. As the last remaining wide-ranging large carnivore in Southern California, the ability to move through large swaths of interconnected habitat is vital for genetic connectivity and their long-term survival. Local extinction of mountain lions in the region could have severe ecological consequences. Many scavengers, including many raptors, foxes, and numerous insects, would lose a reliable food source (Barry et al., 2019; Elbroch et al., 2017; Ruth & Elbroch, 2014). Fish, birds, amphibians, reptiles, rare native plants, and butterflies could potentially diminish if this apex predator were lost (Ripple et al., 2014; Ripple & Beschta, 2006, 2008). Loss of this ecosystem engineer and important predator-prey dynamics could have cascading effects on other plant and animal species, potentially leading to a decrease in biodiversity and diminished overall ecosystem function (Barry et al., 2019; Benson, Mahoney, et al., 2020; Elbroch et al., 2017; Ripple et al., 2014). Virtually all of the studies cited above regarding the extinction vortex faced by mountain lions in Southern California were conducted and released after the EIR was certified for the Project in 2005. As such, the 2005 EIR does not—and cannot—adequately analyze or mitigate impacts of the Project on mountain lions, a CESA provisionally-listed species. This fact alone necessitates inclusion of mountain lions in the DSEIR before the County undergoes any approvals or issuance of any type of permits for the Project.

We also note that we have reviewed the one-page document entitled "Wildlife Movement Path" that appears to have been prepared by the developer's consultant, and it is woefully deficient as a basis for analyzing or mitigating impacts to mountains lions and wildlife connectivity. Indeed, the "movement path" outlined in the document appears designed to funnel animals into narrow areas next to the 210 Freeway with no pathway for actual wildlife movement. This is not an appropriate or workable pathway for wildlife movement, particularly given that mountain lions are very sensitive to human activities, noise, and light (as documented above). The proposed Project also renders the existing wildlife crossing under the 210 Freeway ineffectual, blocking the crossing with new development and activity that will severely impede movement. The proposed Project will thus interfere with both local and regional connectivity, further fragmenting the limited habitat that remains available to the struggling local mountain lion population.

The DSEIR must therefore conduct a thorough analysis of mountain lion presence in and around the Project area; examine the Project's potential impacts on mountain lions, including edge effects and effects on connectivity; and determine how the Project can avoid, minimize, and

mitigate impacts to mountain lions and wildlife movement. The DSEIR must also consider alternatives to the Project that do not harm mountain lions and adopt all feasible mitigation measures to reduce impacts.

III. Given Significant New Information, The DSEIR Must Include Analysis and Mitigation of Impacts to Wildfire Risk

Significant new information regarding the risk of building new large-scale development in fire zones has emerged since certification of the EIR in 2005, which necessitates the inclusion of an updated analysis of wildfire risk in the DSEIR.

CEQA requires an EIR to identify and analyze a project's significant environmental impacts, including those impacts caused or exacerbated "by bringing development and people into the area affected." (Pub. Resources Code, §§ 21002, 21002.1, subd. (a); CEQA Guidelines, § 15126.2, subd. (a).) The impacts of development in areas prone to wildfire specifically require consideration: "the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, *wildfire risk areas*), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazard areas." (CEQA Guidelines, § 15126.2, subd. (a), emphasis added.) A California Court of Appeal also recently blocked development over wildfire concerns because the county failed to adequately assess wildfire risk. (See *People ex rel. Bonta v. County of Lake* (2024)105 Cal.App.5th 1222, 1235 [finding that EIR must sufficiently discuss the project's potential adverse effect of human-cause ignitions and analyze in some detail how the project's design or mitigation measures alleviates such risks, and lead agency failed to utilize industry standard modeling tools or appropriate methodologies for its conclusory findings]).

As detailed below, new research has emerged on the impacts of wildfires on native wildlife, the link between development and ignition risk in fire-prone areas, the impacts of climate change on wildfire risk, the social, public health and economics costs associated with fires in the wildland urban interface, and the role of Indigenous communities historically and presently in wildfire management and its impacts. The SDEIR must adequately assess and mitigate the Project's impacts to wildfire risk and the aftermath of a wildfire when it burns through communities in and near the Project area.

a. Development in High Fire-prone Areas Increases Ignition Risk

The last decade of unprecedented wildfires in the wildland urban interface—where homes extend into the natural landscape—has been devastating for people and wildlife. Poor land-use planning plays a primary role in destructive wildfire.

Since 2015 California wildfires have killed more than 230 people and destroyed more than 75,000 structures in the WUI. Hundreds of thousands of people have had to evacuate their homes and endure power outages, and millions have been exposed to unhealthy levels of smoke and toxic air, soil, and water pollution. Meanwhile costs for fire suppression, loss of life, medical expenses, property damage, and indirect economic losses are in the hundreds of billions of dollars.

The Project would bring more development and human activity into fire-prone areas, thereby increasing ignition risk and endangering the lives of new residents and existing communities. Our collective understanding of wildfire risk has grown significantly since the EIR was certified in 2005, so the DSEIR must include an updated analysis of wildfire risk and mitigation of potential impacts.

According to a 2019 report from Governor Gavin Newsom's Office, construction of more homes in the WUI is one of the main factors that "magnify the wildfire threat and place substantially more people and property at risk than ever before" (Governor Newsom's Strike Force, 2019). A 2019 study found that housing and human infrastructure in fire-prone wildlands are the main drivers of fire ignitions and structure loss (Syphard, Rustigian-Romsos, et al., 2019). Sprawl developments extending into habitats that are prone to fire have led to more frequent wildfires caused by human ignitions, like power lines, arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Alexandre, Stewart, Keuler, et al., 2016; Alexandre, Stewart, Mockrin, et al., 2016; Balch et al., 2017; Bistinas et al., 2013; Keeley et al., 1999; Keeley & Fotheringham, 2003; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard et al., 2007, 2012; Syphard, Rustigian-Romsos, et al., 2019).

Almost all destructive wildfires are accidentally ignited by humans or human infrastructure near roads and development (Balch et al., 2024; Chen & Jin, 2022; Syphard, Rustigian-Romsos, et al., 2019). For example, the 2018 Camp and Woolsey fires and 2017 Tubbs and Thomas fires were sparked by powerlines or electrical equipment and the 2017 Carr fire was caused by car sparks. And although still under investigation, embers from a previous fire ignited by fireworks are suspected to have caused the Palisades Fire and a spark from a Southern California Edison powerline likely caused the Eaton Fire in January, 2025. All of these fires are in the top 20 most destructive wildfires in California history. Placing more homes and people in high fire-prone areas will increase the potential likelihood of these ignition sources, as has been documented in multiple scientific studies (Balch et al., 2017; Bistinas et al., 2013; Keeley et al., 1999; Keeley & Fotheringham, 2003; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard et al., 2007, 2012; Syphard, Rustigian-Romsos, et al., 2019). A 2019 study discusses a poignant and cautionary example: the 2017 Tubbs Fire and the 1964 Hanly Fire had very similar burned area footprints, yet the Tubbs fire burned over 5500 structures and killed at least 22 people while the 1964 Hanly Fire only burned about 100 structures and no one died (Keeley & Syphard, 2019).

The authors suggest that the increased population and human infrastructure in the area led to an increased chance of human-caused ignitions during an extreme wind event (the Tubbs fire was caused by faulty electrical equipment on private property) and the sprawl development over the decades since 1964 put more people at risk (Keeley & Syphard, 2019). Wildfire experts are now constantly and unambiguously pointing out the dangers of placing communities in fire-prone areas.

Most destruction to human communities from fire has been caused by wind-driven, human-ignited fires in mixed shrublands and grasslands (Balch et al., 2024; Radeloff et al., 2023). Although wildfires are a natural and necessary process in California's landscapes and much of the state's diverse shrubland communities are adapted to a high severity infrequent wildfire regime, increases in fire frequency in these systems disrupt the historical fire regimes they have evolved with. This can lead to the establishment of more flammable non-native grasses that increase fire threat over time (Keeley, 2005, 2006; Safford & Van de Water, 2014; Syphard, Brennan, et al., 2019; Syphard et al., 2009, 2018). Other disturbance and associated edge effects from roads and development, such as nitrogen deposition from vehicle emissions, can also lead to the establishment of such invasive grasses (Keeley et al., 2011) as well as reduced native biodiversity (Hernández et al., 2016). Thus, continued development in fire-prone wildlands has the potential to perpetuate a feedback loop of increased wildfire that fuels climate change while eliminating and degrading California's native ecosystems. Southern California is especially vulnerable with significant pressure to push the WUI further and further into adjacent high fire-prone shrublands. The Project as proposed would likely increase the risk of wildfire and contribute to this negative feedback loop.

The proposed Project will bring more people and increased human activity into fire-prone landscapes and will therefore increase ignition risk. The Project's environmental review must include a consideration of the combination of factors driving destructive wildfires in the WUI and fully analyze and mitigate wildfire risks. The 2005 EIR was certified before recent studies outlining the risk of building in fire zones were available, and before year-round wildfires became the "new normal" in California. It is therefore necessary to include wildfire analysis in the DSEIR.

b. Increased Development in Fire Zones Disrupts Natural Fire Regimes and Harms California's Ecosystems and Wildlife

Wildlife and the habitats they rely on have also suffered from the last decade of unprecedented fires in the WUI. Fragmented populations of sensitive species, like mountain lions, remnant populations of frogs and fish, resident and migratory birds, and nearby marine life, are vulnerable to further habitat loss and fragmentation as well as the fires themselves, smoke inhalation and air pollution, post-fire landslides, and toxic runoff.

For example, two mountain lion deaths in the Santa Monica Mountains were attributed in part to the 2018 Woolsey Fire. Although mountain lions are highly mobile and generally able to move away from wildfires, these lions were unable to escape to safety because they were boxed in by roads and development. In addition, researchers found that after a large wildfire in an urbanized region, mountain lions avoided burn areas and increased risky behavior that could lead to more conflict with people, increased mortality, and extinction risk (Blakey et al., 2022). Such deaths can destabilize a small mountain lion population that's already facing numerous other threats, including low genetic diversity, vehicle strikes and rodenticide poisoning, and make them more vulnerable to local extinction (Benson et al., 2016, 2019).

Heavy rains after wildfire can trigger landslides and threaten small populations of sensitive, less mobile species that have been diminished and isolated due to habitat loss and fragmentation from sprawl development, dams, disease, non-native predators, and other threats. After the 2020 Bobcat Fire, biologists were desperate to rescue remnant populations of yellow-legged frogs, Santa Ana suckers, unarmored threespine stickleback fish, speckled dace, arroyo chub and arroyo chub because they were concerned that post-fire landslides due to winter rains would wipe out their populations in the fire zone (Sahagun, 2020). Biologists conducted similar rescue missions for the last-known populations of Southern California steelhead and northern tidewater gobies in the Satna Monica Mountains after the 2025 Palisades Fire (Seidman, 2025a, 2025b, 2025c).

Historically, these species would have been able to recolonize from neighboring populations after the loss of individuals or populations to fire impacts. Unfortunately, that ability is now limited by the species' current small and fragmented population structure. Continued alteration of historical fire regimes due to sprawl development will further endanger remnant populations.

Scientists also warn of impacts of wildfires in the WUI to ocean health. After the 2025 LA wildfires, toxic ash was detected at least 100 miles offshore (Purtill & Xia, 2025). While marine ecosystems are adapted to vegetation fires and even benefit from receiving important nutrients that boost phytoplankton growth from such fires, wildfires in the WUI release dangerous chemicals that can harm wildlife, including heavy metals, asbestos, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and more.

c. Climate Change is Amplifying Wildfire Risk

The 2005 EIR lacks new information regarding the impacts of climate change on wildfire. Climate change is exacerbating extreme weather conditions and wildfire impacts (Williams et al., 2019). Progressively hotter, drier, and windier conditions and more extreme weather events due to climate change are making it easier for wildfires to ignite and spread. The number of days with extreme fire weather conditions in California has doubled since 1980, and

further climate change will amplify that trend (Goss et al., 2020). Hotter and drier conditions combined with later and shorter rainy seasons are making the landscape more conducive to wildfire ignitions and spread while lengthening the fire season (Dong et al., 2022; Goss et al., 2020; Luković et al., 2021; Ma et al., 2021; Madakumbura, Moritz, et al., 2025; Madakumbura, Thackeray, et al., 2025; Swain, 2021).

Experts claim that climate change is responsible for intensifying what would have already been extreme fires in Altadena and Pacific Palisades in 2025. Two very wet years in a row (winters of 2022-2023 and 2023-2024) contributed about 10% of vegetation on the landscape, and the following uncharacteristically hot summer, a record-breaking fall heatwave, and a very dry start to the rainy season likely made the vegetation 25% drier (Madakumbura, Thackeray, et al., 2025). Combined with extreme seasonal winds and human ignitions, the Eaton and Palisades fires ravaged unexpecting communities. Experts estimated that the hotter, drier conditions and extreme fire weather due to climate change made these devastating fires 35% more likely and 6% more intense (Barnes et al., 2025). Continued climate change and increasing fire conditions will lead to more intense and more destructive wildfires (Barnes et al., 2025; MacDonald et al., 2023).

Researchers have also found that fires are spreading faster. Between 2001 and 2020 the maximum daily growth rate of wildfires in the U.S. more than doubled, and California fires grew almost 400% faster (Balch et al., 2024). Experts suggest that this trend could be due to warming temperatures, habitat conversion to more flammable vegetation (i.e., nonnative grasses), and/or the co-occurrence of high winds with increasing human-related ignitions (Balch et al., 2024).

Scientists predict that climate change will continue trends of hotter and drier conditions and shorter rainy seasons, which will increase the flammability of vegetation, lengthen the fire season, increase extreme fire weather, heighten wildfire risk, and lead to more intense wildfires (MacDonald et al., 2023). This must be considered in the DSEIR.

d. Public Health and Economic Costs of Wildfire

As discussed in the Center for Biological Diversity's report, *The True Cost of Sprawl: Bad Planning Harms People, Wildlife and the Climate* (Reid-Wainscoat et al., 2024), impacts of wildfire disproportionately affect vulnerable communities with less adaptive capacity to respond to and recover from hazards like wildfire. Low-income and minority communities, especially Native American, Black, Latinx and Southeast Asian communities, are the most marginalized groups when wildfires occur (Davies et al., 2018). Wildfires also place additional strain on public resources and firefighters, including economic strain and significant health and safety risks.

i. Evacuation Impacts

At-risk populations (*e.g.,* low-income, elderly, disabled, non-English-speaking, unhoused) often have limited resources for disaster planning and preparedness (Richards, 2019). Vulnerable groups with fewer resources are less likely to have cars they can use to evacuate, buy fire insurance, implement fire-resilient retrofits, maintain defensible space around their homes, or rebuild, and they have less access to disaster relief during recovery (Davis, 2018; Fothergill & Peak, 2004; Harnett, 2018; Morris, 2018; Ong, Pech, Frasure, et al., 2025; Richards, 2019; Vives & Castillo, 2025). Survivors are left without resources to cope with the death of loved ones, physical injuries, and emotional trauma from the chaos that wildfires have inflicted on their communities.

Emergency services often miss at-risk individuals when disasters happen because of limited capacity or language constraints (Richards, 2019). This was the case for both the Palisades and Eaton fires in 2025. Many elderly and disabled community members unable to evacuate on their own were left stranded as the wildfires advanced, and the median age of those who died in the fires was 77 (Ellis, 2025; Jarvie et al., 2025). Meanwhile, delayed evacuation alerts and limited fire trucks in western Altadena, a predominantly Black and Latino neighborhood, resulted in 18 of the 19 deaths from the wildfire (Castleman, 2025; Ellis & Greene, 2025; Toohey & Jarvie, 2025).

In the aftermath of wildfires and other environmental disasters, news stories have repeatedly documented the lack of multilingual evacuation warnings leaving non-English speakers in danger (Axelrod, 2017; Banse, 2018; Gerety, 2015; Ong, Pech, Ong, et al., 2025; Richards, 2019). This was exemplified during the Eaton and Palisades fires; evacuation alerts were only sent in English and Spanish, leaving more than 12,000 Asian Americans with limited English proficiency in the evacuation zones without potentially life-saving information (Ong, Pech, Ong, et al., 2025).

ii. Public Health Impacts

Wildfires can have both acute and long-term health effects that disproportionately affect vulnerable populations. A recent study found that wildfire smoke now accounts for up to 50% of ambient fine particle pollution ($PM_{2.5}$) in the western United States (Burke et al., 2021).

Unintentional wildfires due to human activity and ill-placed developments lead to increased occurrences of poor outdoor and indoor air quality from $PM_{2.5}$ from smoke (*e.g.*, Phuleria et al., 2005), which can have both acute and long-term health effects that disproportionately affect vulnerable populations, like children, the elderly, those with underlying chronic disease, low-income communities, and communities of color. Hospital visits for respiratory symptoms (*e.g.*, asthma, acute bronchitis, pneumonia, or chronic obstructive pulmonary disease) and cardiovascular symptoms (*e.g.*, congestive heart failure, ischemic heart disease, and myocardial infarction) have been shown to increase during and/or after fire events

(Delfino et al., 2009; Künzli et al., 2006; Liu et al., 2015; Rappold et al., 2012; Reid et al., 2016; Viswanathan et al., 2006).

In addition, epidemiologists have found that increased exposure to wildfire smoke may also be linked to higher rates of dementia (B. Zhang et al., 2023; Z. Zhang et al., 2023). Experts have also found that greater exposure to wildfire smoke and excessive heat during the month before conception and the first trimester of pregnancy is linked with greater risk of both short- and long-term health problems (Evans et al., 2022; Khalili et al., 2025).

Scientists are still uncovering the devastating health impacts of wildfires in the WUI. In a study that included more than 1,100 participants affected by the 2023 Maui wildfires, researchers found that six to 14 months after the wildfires more than 20% of participants had reduced lung function and almost 50% had clinical symptoms of depression (Juarez et al., 2025). The majority of participants reported food insecurity, economic hardship, and displacement due to the wildfires (Juarez et al., 2025), and in the month of the wildfires, the suicide and overdose rate doubled (Purtle et al., 2025). Other experts attributed more than 400 additional deaths to the LA wildfires, likely due to poor air quality, delays in health care, and other factors (Paglino et al., 2025). Between 2008 and 2018 researchers estimated more than 50,000 premature deaths were caused by California wildfire smoke (Connolly et al., 2024).

Increases in wildfire also result in higher frequency and toxicity of smoke exposure to communities in the path of and downwind of the fires. This is evident in the aftermath of the 2025 LA wildfires, where toxic air pollution and runoff from burned buildings and urban infrastructure are a growing concern. Air pollution results not only from burned vegetation, but also from burned homes, commercial buildings, cars, etc. Buildings and structures often contain plastic materials, metals, and various stored chemicals that release toxic chemicals when burned, such as pesticides, solvents, paints, and cleaning solutions (Weinhold, 2011). During the 2018 Camp Fire that burned 19,000 structures, the smoke caused dangerously high levels of air pollution in the Sacramento Valley and Bay Area and the California Air Resources Board found that high levels of heavy metals like lead and zinc traveled more than 150 miles (CARB, 2021). And unsafe levels of lead, arsenic, and other dangerous metals have been documented in and downwind of the Eaton and Palisades fire footprints (Champlin, 2025; H. Smith & Briscoe, 2025).

iii. Economic and Health Impacts on Firefighters and Firefighting Resources

More development in fire-prone areas will necessitate significant firefighting costs from both state and local authorities. The California Department of Forestry and Fire ("CalFire") is primarily responsible for addressing wildfires when they occur, and its costs have continued to increase as wildfires in the wildland-urban interface have grown more destructive. The cost of fire suppression in areas managed by CalFire has skyrocketed from $114 million in the 2000-

2001 fiscal year to close to $3 billion for the 2020-2021 and 2021-2022 fiscal years combined (CalFire 2022). The Legislative Analyst's Office (LAO) reported that CalFire used an estimated $3.3 billion for wildfire protection and suppression in the 2022-2023 fiscal year (LAO 2023). This does not include the cost of lives lost, property damages, or clean up. Researchers found that the 2018 California wildfires, which included the Camp Fire that burned through Paradise and the Woolsey Fire that burned through Ventura and Santa Barbara, resulted in $148.5 billion in in capital losses, health costs related to air pollution exposure, and indirect losses due to broader economic disruption cascading along regional and national supply chains (D. Wang et al., 2021). Experts estimate the costs of the 2025 Los Angeles fires could be between $250 and $275 billion when considering damage to homes, businesses, and infrastructure and the costs of health impacts, evacuation, cleanup and recovery, and economic losses (Danielle, 2025). Costs could continue to rise as we learn more about the extent of the damage and the long-term impacts of exposure to toxic air pollutants, contaminated waters and soils, and the trauma of fleeing wildfires and/or losing homes, schools, and communities.

Climate change is increasing extreme weather and fire conditions, which, in combination with poorly planned development, has led to more ignitions and longer fire seasons that are increasing strain on over-burdened firefighters and first responders. According to Captain Michael Feyh of the Sacramento Fire Department, California no longer has a fire season (Simon, 2018); wildfires in California are now year-round because of increased human ignitions in fire-prone areas. Emergency calls to fire departments have tripled since the 1980s (Gutierrez & Cassidy, 2018), and firefighters (and equipment) are being spread thin throughout the state. Firefighters often work 24- to 36-hour shifts for extended periods of time (often weeks at a time), and are being kept away from their homes and families for more and more days out of the year (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Greene, 2018; Gutierrez, 2018; Simon, 2018). In addition, the firefighting force often must rely on volunteers to battle fires year-round. At its peak, more than 16,000 firefighters from the U.S., Canada, and Mexico, including from prison systems, were combatting the 2025 LA wildfires.

The extended fire season is taking a toll on the physical, mental, and emotional health of firefighters, as well as the emotional health of their families (Ashton et al., 2018; Del Real & Kang, 2018; Simon, 2018). In addition, wildland firefighters are suffering disproportionately high rates of cancer and other serious diseases, likely due to extreme smoke exposure (Dreier, 2025; Hwang et al., 2023; Johnson & Lam, 2023), as well as mental health issues due to extended fire seasons and separation from their families (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Greene, 2018; Gutierrez, 2018; Simon, 2018). For those fighting urban conflagrations, exposure to hazardous pollutants is even higher. In a preliminary study conducted on firefighters who fought the LA wildfires, lead and mercury blood levels were five and three times higher compared to firefighters who fought vegetation wildfires (Hernandez, 2025). In addition, the physical and mental fatigue of endlessly fighting fires and experiencing trauma can lead to exhaustion, which can cause mistakes in life-or-death situations while on

duty, and the constant worry and aftermath that family members endure when their loved ones are away working in life-threatening conditions can be harrowing (Ashton et al., 2018). According to psychologist Dr. Nancy Bohl-Penrod, the strain of fighting fires without having sufficient breaks can impact firefighters' interactions with their families, their emotions, and their personalities (Bransford et al., 2018). There have also been reports that suicide rates and substance abuse have increased among firefighters (Cart, 2022; Greene, 2018; Simon, 2018).

e. The SDEIR Should Incorporate Traditional Ecological Knowledge and Indigenous Science into Its Wildfire Analysis

New information regarding the impact of wildfire on Indigenous communities and the importance of cultural burning and prescribed fire also are not included in the 2005 EIR. For millennia, Indigenous burning practices and lightning strikes drove ecosystem-specific fire regimes that varied in frequency, size, severity, and seasonality (Anderson, 2018; Cuthrell, 2013; Kimmerer & Lake, 2001; Stephens et al., 2007). Numerous Tribes used and continue to use burning for many benefits, including increasing productivity of culturally important plants, managing wildlife, increasing water availability, and reducing the chances of severe fire (Anderson, 2018; Kimmerer & Lake, 2001; MacDonald et al., 2023). Because of this history, many ecosystems have adaptations to survive and thrive in specific wildfire regimes (i.e., good or beneficial fire). But the genocide and displacement of Native Peoples, criminalization of fire practices, and reckless land use in the last 150 years have dramatically altered fire regimes while placing more people in harm's way (MacDonald et al., 2023).

Indigenous communities are also disproportionately impacted by wildfire. Native Americans were found to be six times more likely than other groups to live in high fire-prone areas, and high vulnerability due to socioeconomic barriers makes it more difficult for these communities to recover after a large wildfire (Davies et al., 2018). In addition, farmworkers, who are majority people of color and often include migrant workers that come from Indigenous communities, often have less access to healthcare due to immigration or economic status. They are more vulnerable to the health impacts of poor air quality due to increased exposure to air pollution as they work. Yet farmworkers often have to continue working while fires burn, and smoke fills the air, or risk not getting paid (Herrera, 2018; Kardas-Nelson et al., 2020; Parshley, 2018).

Traditional ecological knowledge ("TEK") is often excluded from analyses or distilled to conform to Western science (Ramos, 2022). EIRs often fail to acknowledge that Indigenous communities and cultural burning played a role in California's historical fire activity and often only mention previous wildfires in the area in CalFire records. This perpetuates the exclusion and marginalization of Indigenous communities and TEK. Consultation with local Native Tribes and incorporation of Indigenous science, including but not limited to oral histories, ethnographies (that may include burn scars and charcoal records), and archeological data should

be incorporated in fire history analysis. As a society, we need to work towards integrative research that "transcends disciplinary boundaries" and employs a range of methodological options to get a deeper understanding of the relationship between people and ecosystems (Ramos, 2022). Doing so will help inform fire management strategies and mitigation measures that work towards reducing harms of wildfire to people while facilitating beneficial fire for the appropriate ecosystems. The DSEIR should include these issues.

In summary, significant new research has emerged on the impacts of wildfires on native wildlife, the link between development and ignition risk in fire-prone areas, the impacts of climate change on wildfire risk, the social, public health and economics costs associated with fires in the wildland urban interface, and the role of Indigenous communities historically and presently in wildfire management and its impacts since the EIR for the propose Project was certified in 2005. Given this increased understanding of wildfire and development, it is clear that the Project could increase the risk of unintentional human-driven wildfires that disrupt natural fire regimes, threaten California's wildlife, and put more people in harm's way. The SDEIR must therefore adequately assess and mitigate the Project's impacts to wildfire risk and the potential aftermath of a wildfire in and around the Project area.

IV. The DSEIR Must Include Analysis and Mitigation of Climate Impacts and Loss of Carbon Sequestration from the Proposed Project

As outlined below, significant new information regarding the climate crisis and the carbon sequestration benefit of the Project site now exists. This information should be included in the DSEIR, and the impacts of the Project on greenhouse gas emissions and loss of carbon sequestration should be fully analyzed and mitigated.

a. Climate Change is a Catastrophic and Pressing Threat to California

A strong, international scientific consensus has established that human-caused climate change is causing widespread harms to human society and natural systems, and that climate change threats are becoming increasingly dangerous. The Intergovernmental Panel on Climate Change (IPCC), the leading international scientific body for the assessment of climate change, concluded in its 2023 Sixth Assessment Report that: "[u]nsustainable and unequal energy and land use as well as more than a century of burning fossil fuels have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850-1900 in 2011-2020." (IPCC, 2023). The increase in global surface temperature has resulted in sea level rise, increased frequency of extreme weather events, and has resulted in "irreversible losses" at the species and ecosystem levels. (IPCC, 2023). These findings were echoed in the United States' own 2023 Fifth National Climate Assessment, prepared by scientific experts and reviewed by the National Academy of Sciences and multiple federal agencies. The 2023 Assessment concluded that "[t]he global warming observed over the industrial era is unequivocally caused by greenhouse gas

emissions from human activities–primarily burning fossil fuels" and long-term responses include "sea level rise, ice sheet losses, and associated disruptions to human health, social systems, and ecosystems." (US Global Change Research Program, 2023).

In its 2020 update, the National Academy of Sciences and the Royal Society concluded that climate change is largely a result of human activity, as "natural causes alone are inadequate to explain the recent observed changes in climate." (National Academy of Sciences & Royal Society, 2020). The additional carbon input from human activities has significantly disturbed the natural carbon cycle, resulting in an imbalance in the system that fosters global climate stability. (National Academy of Sciences & Royal Society, 2020). Based on observed and expected harms from climate change, in 2009 the U.S. Environmental Protection Agency found that greenhouse gas pollution endangers the health and welfare of current and future generations. (74 Fed. Reg. 66496 (Dec. 15, 2009) [U.S. EPA, Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act; Final Rule].) In 2021, EPA again recognized the critical nature of the climate crisis, stating that: "[t]he changing climate is affecting people's health and livelihoods and damaging infrastructure, ecosystems, and social systems in communities in every region of the nation." (US Environmental Protection Agency, 2021).

The impacts of climate change will be felt by humans and wildlife. Climate change is increasing stress on species and ecosystems—causing species-level changes in morphology, behavior, phenology, and geographic range shifts, and ecosystem-level changes such as the increasing frequency of extreme weather events, widespread changes in productivity, species interactions, and vulnerability to biological invasions (Weiskopf et al., 2020). Climate-change-related local extinctions are already widespread and have occurred in hundreds of species. (Wiens, 2016). Catastrophic levels of species extinctions are projected during this century if climate change continues unabated (Maclean & Wilson, 2011; Thomas et al., 2004; Urban, 2015). Conservation actions aimed at protecting biodiversity can slow the progression of climate change–the ecosystem services provided by biodiverse ecosystems are an integral part in the balanced functioning of our climate system (Shin et al., 2022).

Immediate and aggressive greenhouse gas emissions reductions are necessary to keep warming well below 2°C above pre-industrial levels. The IPCC Sixth Assessment Report and other expert assessments have established global carbon budgets, or the total amount of carbon that can be burned while maintaining some probability of staying below a given temperature target. According to the IPCC, "[t]he best estimates of the remaining carbon budgets from the beginning of 2020 are 500 GtCO2 for a 50% likelihood of limiting global warming to 1.5°C and 1150 GtCO2 for a 67% likelihood of limiting warming to 2°C." (IPCC, 2023). Additionally, "[i]f the annual CO2 emissions between 2020-2030 stayed, on average, at the same level as 2019, the resulting cumulative emissions would almost exhaust the remaining carbon budget for 1.5°C (50%), and deplete more than a third of the remaining carbon budget for 2°C (67%)." (IPCC,

2023). As of 2023, climate policies by the world's countries would lead to an estimated 2.7°C of warming, and possibly up to 3.4°C of warming, well above the level needed to avoid the worst dangers of climate change (Climate Action Tracker, 2023).

In California, climate change will transform our climate, resulting in such impacts as increased temperatures and wildfires, and a reduction in snowpack and precipitation levels and water availability (Turco et al., 2023). In response to inadequate action on the national level, California has taken steps through legislation and regulation to fight climate change and reduce statewide GHG emissions. Enforcement and compliance with these steps are essential to help stabilize the climate and avoid catastrophic impacts to our environment. California has a mandate under AB 1279, the California Climate Crisis Act, to achieve net zero GHG emissions by no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide GHG emissions are reduced to 85% the level in 1990 (AB 1279 2022). In 2019, Governor Newsom issued an executive order to leverage state investments to further California's climate goals (Executive Order N-19-19 (2019)). Newsom has continued to issue climate-related executive orders, such as a 2020 order requiring that, by 2035, all passenger vehicles will be zero-emission, in addition to other motor vehicle emission goals. (Executive Order N-79-20 (2020)). These laws were implemented after the EIR was certified in 2005, and therefore constitute significant new information that should be considered in the DSEIR.

In a 2022 report, the California Air Resources Board concluded that California is currently not on track to meet its GHG reduction targets (CARB, 2022). Projects like Canyon Hills have the potential to widen the gap between where California needs to be to tackle the climate crisis and where it is headed. The DSEIR thoroughly analyze the Project's anticipated greenhouse gas emissions, including those resulting from reduced carbon sequestration capacity.

Although some sources of GHG emissions may seem insignificant, climate change is a problem with cumulative impacts and effects. (*Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, (9th Cir. 2008) 538 F.3d 1172, 1217 ("the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis" that agencies must conduct).) One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California's climate as a whole. Therefore, project-specific GHG emission disclosure, analysis and mitigation is vital to California meeting its climate goals and maintaining our climate.

b. Native Habitats are Significant Carbon Sinks.

The Canyon Hills Project would destroy more than 300 acres of chaparral and riparian habitats. Given the increased urgency in combatting climate change and new knowledge that California is currently not on track to meet its GHG reduction targets, loss of carbon storage and sequestration potential in these habitats due to the Project should be accounted for in the DSEIR.

As detailed in a 2023 Center Report, "Hidden in Plain Sight: California's Native Habitats are Valuable Carbon Sinks" (Yap et al., 2023), non-forest arid and semi-arid habitats, like the shrublands and riparian habitats in the Project area, can store significant amounts of carbon by keeping it from being released and sequester it by removing it from the atmosphere. For example, researchers found that shrublands, including chaparral and sage scrub, have been found to store an estimated average of 22.5 – 35.3 metric tons of carbon per acre (in their aboveground biomass, leaf litter, and soil) and sequester 0.45 to 1.7 metric tons of carbon per acre per year, and the amount of carbon stored and sequestered increased with the age of the shrubs (Table 1) (Bohlman et al., 2018). And researchers estimate riparian habitats could store on average 233.8 metric tons of carbon per acre in aboveground biomass and about 40 metric tons of carbon per acre in their soils (Matzek et al., 2020). Although the data vary by age of the vegetation and fluctuate based on varying environmental conditions, these statistics indicate the untapped potential of shrublands and riparian habitats for carbon storage and sequestration in the fight against climate change (Yap et al., 2023).

Given that the Project area is vegetated and filled with shrublands and riparian habitat, it is likely that the area stores and sequesters a significant amount of carbon. Destroying and degrading undeveloped shrublands and riparian habitats could release significant amounts of carbon that must be accounted for. CEQA requires adequate assessment and mitigation of a project's impacts. The DSEIR must therefore disclose the carbon emissions associated with the loss of currently stored carbon as well as the loss of future carbon that would have been sequestered by these habitats over the Project lifetime.

V. Conclusion

Thank you for the opportunity to submit comments on the Canyon Hills ITP NOP. The SDEIR must not only consider impacts to Crotch's bumble bee, but must also include a full analysis of impacts to mountain lion, wildfire risk, and loss of sequestered carbon. Please add the Center to your notice list for all future updates to the Project using the email address below and do not hesitate to contact the Center with any questions.

Sincerely,



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Exhibit 1

Mountain Lion Road Mortalities 2002-2018

Santa Monica Mountains National Recreation Area

National Park Service
U.S. Department of the Interior



Coordinate System: NAD 1983 UTM Zone 11N

The NPS makes no warranty, express or implied, related to the accuracy or content of this map.

From: Chanae <chanaemariemarie@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/27/2025 1:53:29 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Chanae Owens, and I am writing as a concerned resident & environmentalist in LA county regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
Presence of CESA-listed California mountain lions (Puma concolor)
Disruption of critical wildlife corridor (I-210 Freeway crossing)
Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability
The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Chanae Owens

From: "Cheryl Roberts" <cheryllane.r@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 10:38:23 PM
Subject: Canyon Hills ITP- NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To Whom It May Concern,
As a current resident of the La Tuna Cyn, and a life long Angelino, it has become apparent that local and State politicians have become servants of the Developers instead of serving the People.
Destroying one of the few rural, beautiful places left in this area of Los Angeles while there is 1,000s of acreage that can be developed in the Antelope Valley is an injustice to the beautiful wildlife and Angelinos that co-exist together, as well as every other outside visitor that comes the this area for outdoor activities and reconnection with nature.
When does this madness end, when do the politicians start caring about the People's interests first, and not their Corp Donor's?
Wildlife matters!!

From: "Cheyenne Weinstein" <cheyweinstein@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 6:59:20 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Cheyenne Weinstein and I am writing as a concerned naturalist, student, and community member regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Cheyenne Weinstein
10924 Theis Ave

Whittier, CA, 90604
cheyweinstein@gmail.com

Sent from my iPhone

From: elkpen <elkpen@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/29/2025 9:57:12 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Christian Kasperkovitz.
I am writing as an Angeleno and resident of Tujunga in regard to your Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

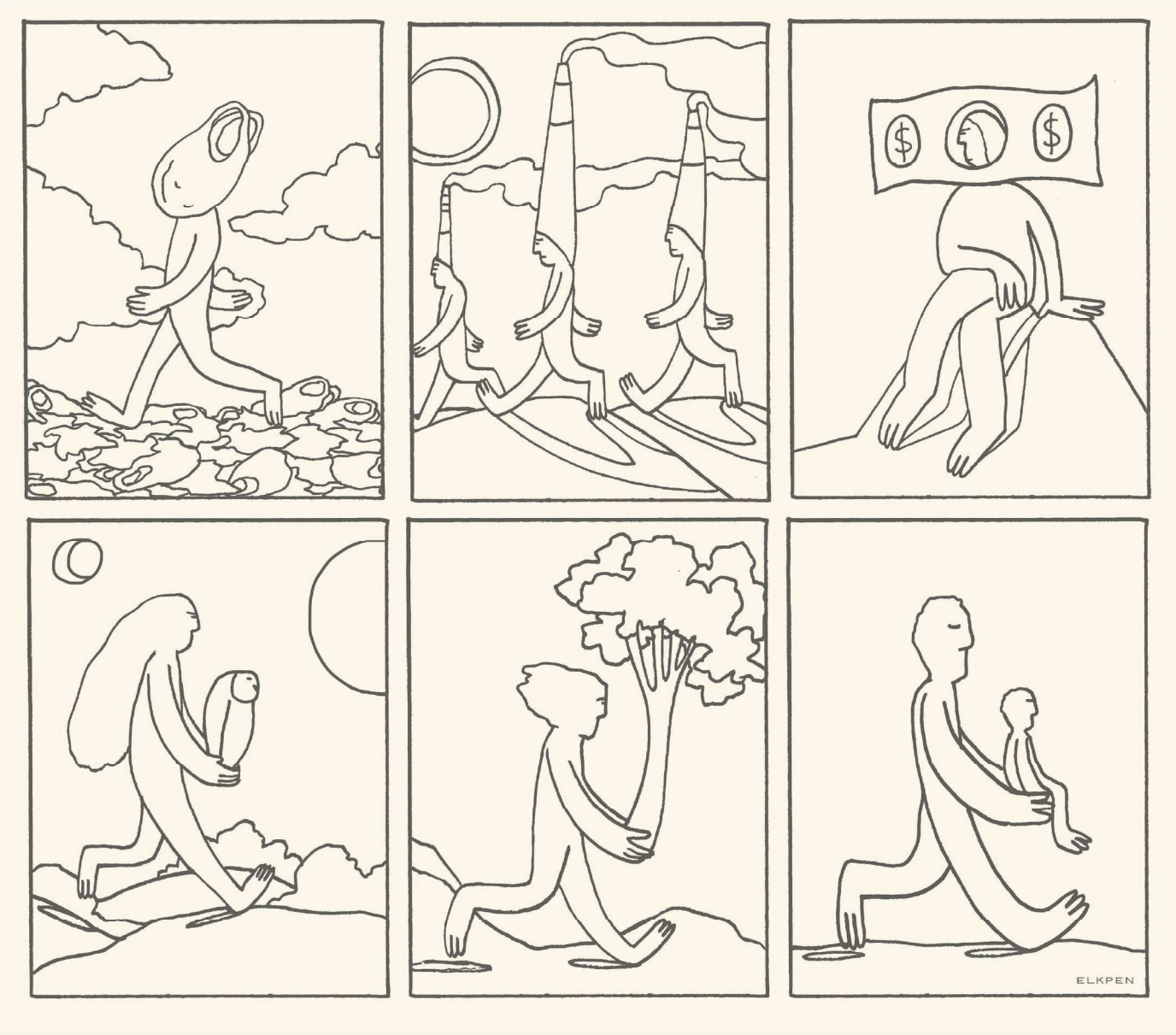
I am grateful for the opportunity to comment, and glad that environmental review of this parcel is being considered. I have been working as a wildlife artist in Los Angeles since 2005 and have had the great fortune to work with biologists from many areas of expertise, some of our city's esteemed non-profits, and in a number of southern California's excellent colleges and universities. I take very seriously the viability of our remaining green spaces for our health and well being, and I thank the CDFW for the critical role you play in helping to ensure this.

Our city should be very proud of our unique relation to an outstanding natural environment. I like to joke with my parents who are retired in rural eastern Canada that I see more wildlife here than they do there. This however is not a given. Indeed we have a unique responsibility to manage our woodland-urban zones. These zones help improve our air and water quality and add immeasureably to our well being and education opportunities. Without these zones we have a hotter, more energy consumptive landscape and our plant and animal resources and communities are gravely impacted. Without care for what remains of our green open spaces, our future is literally grayer. Thank goodness for the good work of CDFW.

Therefore, I ask with deep hope and sincerity that you expand the scope of this SEIR beyond solely evaluating impacts on Crotch's Bumblebee. The location of the Verdugo Mountains makes them unique in maintaining healthy plant and animal communities: losing a small piece of this critical green landmass has over sized implications for all of the County's wild space. This particular 300 acres has been shown to support a male and female mountain lion, an exceptional situation that speaks for just how healthy, diverse and rich this parcel is. I'll add that as a near by neighbor of the site I know all too well the severe fire risk of this area. The Palisades and Eaton fires of January 2025 speak volumes about what has changed since this entitlement was granted.

With great respect, I urge the CDFW to fully use your position as the state agency steward of our lands to do right in spirit, word and action for the intent of our environmental laws and institutions. This is a unique moment in determining the scope of this Environmental Review to make the Review count for being true and relevant to our times and the critical needs of our lands and their plants and animals which ensure our city's health, climate, water and beauty.

Sincerely,
Christian Kasperkovitz
10351 Haines Canyon Ave.,
Tujunga, CA, 91042
www.elkpen.com



From: "Chris Bock" <buddybock@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 8:43:58 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Christopher Bock and I am writing as a concerned environmentalist, regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
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- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species,including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Christopher Bock

415 w rosewood ave apt B

Orange CA

92866

From: "Claudia Kelley, CDE" <ckelley.cde@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 8:31:50 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear Leaders:

I am contacting you today to oppose the approval of a new development on the Verdugo mountain range.

Recent wildfires have already decimated thousands of acres of oxygen producing vegetation -- which is especially important in smog prone Los Angeles -- but also destroyed the habitat of many important wildlife species.

Bees in general, and espcially bumblebees play a crucial role in pollinating fire-resistant plants, such as sage and wild buckwheat, in wildfire-prone areas.

Please do NOT approve this project.

We need permanent green areas and not additional high-density housing in an area with 1950-1960 infrastructure, which doesn't allow for adequate water supply, and escape routes in case of a catastrophic emergency, such as a large eathquake or another large wildfire in our area -- the risk of which is heightened when lots of people used to city life set off fire works in our hills.

Sincerely, Dr.Kelley

Claudia Kelley, PhD, MPH, RD, RN, CCS, CDE, CNSC
Certified Diabetes Educator

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/27/2025 3:05:47 PM
Subject: FW: Canyon Hills ITP Comments

From: Conor <c.hansen1396@gmail.com>
Sent: Tuesday, August 26, 2025 4:59 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

I am writing to oppose development of any homes, but especially unnecessary luxury homes for those who have hoarded excessive resources while most of the country struggles paycheck-to-paycheck. It would be a revolting decision to allow the construction to proceed at the expense of any wildlife at all, and the recent discovery of endangered bees would only compound the moral failure if this construction is allowed to proceed. The project should be rejected and no future construction should be allowed, particularly construction geared towards the benefit of bourgeoisie who have caused so much harm to our only shared planet already.

There is no Planet B.

Conor Hansen

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 3:31:47 PM
Subject: FW: Canyon Hills ITP

Fyi

From: Corey Michener <michenerc@gmail.com>
Sent: Saturday, August 23, 2025 9:50 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP

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Hello,

I am writing to express my support for protecting the Crotch's Bumblebee habitat found in the Verdugo mountains where some luxury homes are to be built. California's natural beauty and flora and fauna should be protected at all cost and are under constant threat from invasive species and human development. If we allow unchecked development to steamroll native habitats we will be left with little of the natural beauty that makes California so special. I strongly urge you to take action to protect this habitat for not just the Crotch's Bumblebee but for all the other species that call it home.

Thank you for your time,

Corey Michener

1104 E California Ave

Glendale 91206

From: "Cynthia Quezada" <cynquezada@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 1:41:10 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Dr Cynthia Quezada and I am writing as a concerned community member that cares about our environment regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

Presence of CESA-listed California mountain lions (*Puma concolor*)
Disruption of critical wildlife corridor (I-210 Freeway crossing)
Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Dr Cynthia Quezada

Sent from my iPhone \u-10179 ?\u-9063 ?

From: "Daniel Allende" <dan@theatsteam.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/5/2025 12:57:40 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from dan@theatsteam.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Daniel Allende, and I am writing as a concerned local resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat. I know the area well, as a local resident and weekly mountain biker of the verdugo hills.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Daniel Allende

From: "Daniel Ventura" <danielventura94@gmail.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/20/2025 6:57:13 PM
Subject: Canyon Hills development - Crotch's Bumblebee

You don't often get email from danielventura94@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>

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Good afternoon,

This is a contribution to a public comment forum submitted by your department concerning the presence of the Crotch's Bumblebee in the Verdugo Mountains on the site of the Canyon Hills Development.

Due to the declining wild species of bees in California I can only say that developing a property of this scale would greatly impact the habitat of the bee, which has been found on the property by "No Canyon Hills'. Additionally, the area is a high fire zone because it is so close to wild brush. Given these facts I am stating that the bee and safety of residents is a reason not to develop. Thank you.

--

Daniel Ventura

From: "David Cole" <davandcol@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 6:25:56 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from davandcol@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is David Cole, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
David A Cole, MA

From: "Demetria V" <dvllnva@hotmail.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/21/2025 3:10:17 AM
Subject: Canyon Hills ITP Comments

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I am submitting a contribution for public comment regarding the presence of Crotch's Bumble Bee in the Verdugo Mountains on the site of Canyon Hills Development.

Due to the declining wild species of the bee population in Southern California, developing said property would further endanger and imperil existing impacted bee populations and bee habitat which has been found on by the property named "No Canyon Hills".

Additionally, the area is a high fire zone due to its proximity to wild brush. Given recent fire experiences of Altadena and Palisades residents, it presents a safety issue.

Given these two facts of preserving bee populations and potential resident safety, these are considerations against development.

Thank You,
Demetria Villanueva
90046

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Faka.ms%2FAAb9ysg&data

From: "DEENA ROSEN" <dnamae@verizon.net>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/3/2025 5:02:01 PM
Subject: Canyon Hills ITP – NOP Scoping Comments PLEASE READ!

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Dear California Department of Fish and Wildlife,

My
name is Deena Rosen, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the
Draft
Supplemental Environmental Impact Report (SEIR)
related to the **Canyon**
Hills Project
and the proposed **Incidental**
Take Permit (ITP)
for Crotch's Bumble Bee.

I
know that the comment period closed yesterday at 5 p.m, but I'm hoping you will take my letter into consideration anyway.
As
a homeowner and resident on Verdugo Crestline Drive for over 20 years, I live right against what is now the border of the proposed Canyon Hills development, and I am deeply concerned about the impacts of the development.
My
family and my neighbors have a huge stake in what happens here: we chose to live on a dirt road in the Verdugo mountains. We love this patch of wildland and the flora and fauna it supports.

We
also know what it means to live in an urban wildland interface deemed a Very High Fire Hazard Severity Zone. The La Tuna Fire in 2017 burned nearly to our yards, ripping through the exact area this development is slated for and taking two houses on Verdugo
Crestline with it. Traffic was so badly impacted that my nextdoor neighbor, who was near downtown at the time of the fire, sat on the 2 freeway for THREE HOURS trying to get to her young teens at home. We evacuated, taking her kids with us, but we were stuck
on Foothill with hundreds of others trying to get in and out of the neighborhood, as well as vehicles re-routed from the 210 onto neighborhood streets. The fire was scary, but the gridlock was terrifying. The first thing I think of when I hear about a plan
to add 221 houses to this area is, *how*
will we all get out in a fire?

I
want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing

the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While
the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental
conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire**
  risk and evacuation limitations
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence**
  of CESA-listed California mountain lions (*Puma*
  ***concolor*)**

- **Disruption**
  of critical wildlife corridor (I-210 Freeway crossing)

- **Cumulative**
  impacts on Threatened and Endangered Species,
  including indirect impacts from habitat fragmentation and development

- **Tribal**
  Cultural Resources

- **Utilities,**
  energy use, and greenhouse gas emissions

- **Climate**
  resilience and long-term ecological sustainability

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Deena
Rosen

7328
Verdugo Crestline Dr., Tujunga

deenamrosen@gmail.com

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 6:29:45 PM
Subject: FW: Crotch's bumblebee

Please see email below.

Thank you,

California Department of Fish and Wildlife

South Coast – Region 5

3883 Ruffin Road

San Diego, CA 92123

P: (858) 467-4201

F: (858) 495-3614

In order to protect a customer's personally identifiable Information (PII), the CDFW license counter is required by management to use secured links for uploading and sending documents or applications containing sensitive customer information. You can call or e-mail to request this link be sent to you. **Any applications or documents sent through the ASKR5 e-mail containing PII will be immediately deleted, and you will be sent a secured link to upload them to.**

If you do not wish to use a secure link, you may also visit our office for processing during the hours of 8:00 – 4:00 Monday through Friday, or you can fax to (858) 495-3614.

Every Californian should conserve water. Find out how at:



SaveOurWater.com · Drought.CA.gov

-----Original Message-----
From: Denver Diaz <dnvrrr@icloud.com>
Sent: Thursday, August 21, 2025 11:26 AM
To: askr5@ca.gov; Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Crotch's bumblebee

[You don't often get email from dnvrrr@icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Hello I’m a resident of California and heavily oppose stupid useless buildings taking up native land for animals and our people.

Please put a stop to the greed and corruption.

Or I will begin a crusade with many other nature enthusiasts to stopping this project.

From: "Devlin Gandy" <iranclouds@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/3/2025 8:25:00 PM
Subject: Re: Canyon Hills ITP - NOP Scoping Comments / 2nd Attempt

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Thank you

On Wed, Sep 3, 2025 at 1:02\u8239 PM Wildlife R5 CEQA <R5ceqa@wildlife.ca.gov> wrote:

> Hello,
>
> This is to confirm we received your email.
>
> Thank you.
>
> ---
>
> **From:** Devlin Gandy <iranclouds@gmail.com>
> **Sent:** Tuesday, September 2, 2025 5:25 PM
> **To:** Wildlife R5 CEQA <R5ceqa@wildlife.ca.gov>
> **Subject:** Canyon Hills ITP - NOP Scoping Comments / 2nd Attempt
>
> WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.
>
> Hello CEQA staff,
>
> I tried to send this in a half hour ago and just realized it bounced back. Trying once more.

Thank you,

Devlin

From: "Devlin Gandy" <iranclouds@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/3/2025 12:24:33 AM
Subject: Canyon Hills ITP - NOP Scoping Comments / 2nd Attempt
Attachments: Gandy_NOP Canyon Hills.pdf

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Hello CEQA staff,

I tried to send this in a half hour ago and just realized it bounced back. Trying once more.

Thank you,
Devlin

Devlin Gandy
2313 Maricopa HWY
Ojai, California 93023
iranclouds@gmail.com
9/2/2025

California Department of Fish and Wildlife
Attention: Canyon Hills ITP – NOP Scoping Comments
3883 Ruffin Road
San Diego, CA 92123
Email: R5CEQA@wildlife.ca.gov

Re: Comment Letter on Notice of Preparation of a Draft Supplemental Environmental Impact Report for Requested Incidental Take Permit for Crotch's Bumble Bee, Canyon Hills Project (SCH No. 2002091018)

Dear CDFW CEQA Staff:

I submit the following comments on the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (S-EIR) for the Canyon Hills Project (SCH No. 2002091018). I was surprised and deeply concerned to learn that the Draft S-EIR will "*focus solely on the Project's impact on the CBB*." Given more than two decades of public comment documenting new and significant information, and repeated acknowledgments by Department staff of the inadequacies of the existing EIR, it is evident that limiting the S-EIR in this manner is inconsistent with the requirements of the California Environmental Quality Act (CEQA). CEQA Guidelines § 15162 and Public Resources Code § 21166 require preparation of a supplemental or subsequent EIR whenever new information of substantial importance reveals new significant environmental effects or substantially more severe impacts than previously analyzed.

Since certification of the 2005 Final EIR and 2014 Addendum, such information has unquestionably emerged: the listing of Southern California mountain lions as a candidate under the California Endangered Species Act; decades of data demonstrating that the property is part of a crucial wildlife corridor linking the San Gabriels and Verdugo's; expanded protections for native trees alongside evidence that hundreds of oaks were never mapped; recognition of the Bear Divide migration bottleneck immediately to the north; increased flood risk to downstream communities due to added runoff and reduced upstream retention capacity; and mounting evidence of severe wildfire evacuation risks in a Very High Fire Hazard Severity Zone. To confine the scope of review to a single pollinator species while disregarding these substantial changes would undermine CEQA's fundamental purpose, misstate baseline conditions, and expose the review process to significant legal vulnerability and costs.

.

Mountain Lion Presence at the Canyon Hills Project Site

The approved Canyon Hills Project Final Environmental Impact Report (F-EIR) asserts: "Mountain lions are not found in the Study Area or any portion of the Verdugo Mountains." Consequently, the F-EIR does not consider any mitigation for mountain lions and concludes, "There would be no significant impacts to regional or local wildlife movement associated with the proposed development on the project site." The claim that mountain lions do not occur in the Verdugo's has been conclusively demonstrated by NPS and CDFW to be false. Indeed, I would like to call attention to the fact that the cover image of the Mountain Lion CESA petition prominently features a National Park Service photo taken in the Verdugo Mountains of a mountain lion known as "Nikita", which available evidence suggests was likely struck and killed by a vehicle within sixty feet of the Canyon Hills Property (discussed in next section)



Figure 1: Tuna Puma" one of multiple lions utilizing the extensive habitat at the Canyon Hills site.

This information provides unambiguous evidence of mountain lions utilizing the Canyon Hills project area since 2014, as evidenced from home security footage taken between ~250ft and ~560ft from the Canyon Hills property. Furthermore, it is evident from publicly available security footage and pet predations that the lion I believe to be P-41 was at least intermittently inhabiting the Canyon Hills site for more than one year between 2014-2015. Additional unambiguous observations of mountain lions with photographic evidence occurred in 2020, 2021, 2023, and 2024. A document compiling mountain lion sightings and movements through the Canyon Hills property and surrounding area was also supplied to CDFW and the City of Los Angeles by Doug Carstens on September 11th, 2024.[1] The cumulative body of evidence agrees to earlier findings made by the NPS, CDFW, Arroyo Foothills Conservancy, SMMRCD and others.

1

Factually Incorrect EIR Conclusions and Addendums

Despite extensive evidence to the contrary, the Canyon Hills EIR prepared by Glenn Lukos & Associates categorically states: "Mountain lions are not found in the Study Area or any portion of the Verdugo Mountains. Therefore, regional movement by the mountain lion within or through the Study Area does not occur." In another section, the EIR continues: "Mountain lion are not present and mule deer are rarely, if at all, present within the project site. Therefore, the proposed project would have no impact on local movement for these species and mitigation is unnecessary." The document then concludes: "There would be no significant impacts to regional or local wildlife movement associated with the proposed development on the project site." These statements are factually inaccurate and indefensible under CEQA, which requires the baseline environmental setting to reflect actual conditions on the ground (Guidelines § 15125(a)). Newspaper reports contemporaneous with the EIR's preparation describe the presence of mountain lions in the Verdugos, and comment letters submitted during the original review period raised concerns about their presence. The EIR's failure to incorporate readily available evidence and its mischaracterization of baseline wildlife conditions rendered its conclusions unreliable at the time of certification, and such deficiencies cannot lawfully be carried forward into a Supplemental EIR.

CDFW Criticism of Existing Wildlife Movement Study

Concern over the EIR findings are evident in inter-agency discourse (accessed via Public Records Act) between CalTrans and CDFW as the developer, Whitebird Inc., sought CalTrans easements in 2020-2022. Though Caltrans had suggested an updated wildlife movement study for the Project be prepared with respect to how the Project could affect movement by mountain lions, the developer only provided a memorandum prepared by Glenn Lukos & Associates, titled: Supplemental Wildlife Movement Information for Canyon Hills Project in Response to September 21, 2021 Letter From Caltrans. As with previous work by Glenn Lukos & Associates, this document omits numerous significant details, such as: 1) the inclusion of the property within the Rim of the Valley expansion and all related studies indicating it is a significant wildlife corridor; 2) omission of two mountain lion vehicle strikes on La Tuna Canyon Road that occurred at roughly 10m and 230m from the project site—the former occurring during the report writing period. Omitting significant information, the memorandum states: "*The observation of mountain lions in the Verdugo Mountains since 2010 does not change the conclusion in the 2003 Study and the Final EIR that the Project would not impact, or 'interfere substantially' with, the movement of mountain lions in the Verdugo Mountains*." The memorandum concludes with:

> …it remains the case that the development of the Project would not interfere substantially with the regional or local movement of mountain lion to the extent that such movement presently occurs or may occur in the future. For all these reasons, no additional field investigations are required and the detailed analysis of this subject in the 2003 Study, as updated by this Memorandum, are sufficient to address the Project's potential impact on mountain lion use in the Verdugo Mountains.

Notably, CDFW staff have repeatedly shown strong concern over the memorandum's glaring issues, as illustrated in these transcribed minutes from a round table meeting in February 2022. Parties listed in the transcribed conversations are: Erika Cleugh (Senior Environmental Scientist, CDFW), Erinn Wilson-Olgin (Formerly: Environmental Program Manager, CDFW; Currently: South Coast Region Region 5 Regional Manager), Paul Caron (Environmental Planning/Biology, CalTrans), Jack Rubens (Developer's Legal Advisor), Tony Bomkamp (Technical Director, Glenn Lukos & Associates).

Erinn: The Wildlife Movement Study corridors did not take into account mountain lion presence so the local corridors were designed for coyotes and badgers assuming no mountain lions. Mountain lions avoid development as much as possible so there is a concern that they'd use the easement area.

Jack: While they didn't discover mountain lion activity, the study did take account of the possibility of mountain lion activity and discussed where that movement could occur. The EIR is presumptively valid and in 2003 no comments were received regarding the mountain lion.

Erinn: CDFW sees a potentially significant issue in regards to the mountain lion movement. CDFW CEQA attorney to take a look at it concerning what we know now is new information.

Jack: New information needs to relate to a new significant impact or a substantial increase in a significant impact. There is no significant impact because the regional movement path is far from the project site and local movement is mostly offsite.

Paul: We know a lot more about wildlife movement now than 20 years ago. Mountain lion has new levels of protection and requires Caltrans as a landowner to take these things into account. We don't want to further jeopardize lions, and we're looking at the easement, not the development.

Tony: Only one mountain lion was sighted north of the 210. GPS data was requested from NPS but no response was received. Verdugo Crestline is the most likely mountain lion pathway.

Paul: The regional pathways are like highways, and the local pathways are like local streets and roads. They may be less important because there are a lot more of them, but if they're impacted the highways (regional pathways) suddenly get very clogged and less functional. If enough of the local pathways are cut off there will be less connection to the regional pathways.

Erika: More information on how these paths were analyzed is needed. It's unclear whether a mountain lion would prefer to walk down a paved road between housing parcels to get through development. SCE is unlikely to be used as per the 2003 study.

Jack: Tony determined there is no regional wildlife path here (connectivity between mountain ranges).

Figure 2: Transcript from February 2022 Roundtable Initiated by Caltrans, including CDFW and the Developer.

I want to emphasize the above (Fig 2) in which Erinn Wilson-Olgin, the South Coast Region (Region 5) Regional Manager, states: "The Wildlife Movement Study corridors did not take into account mountain lion presence." The transcript indicates Wilson-Olgin then doubled down and emphasized, "CDFW sees a potentially significant issue in regard to the mountain lion movement."

Documented Mountain Lion Strikes Adjacent to Project

As previously noted, at least three mountain lion vehicle strikes have occurred in the immediate vicinity of the Canyon Hills project site. The first known mountain lion fatality (Fig. 2) was documented on both California Roadkill Observation System[2] and by NPS[3] in January 2015 on La Tuna Canyon Road. Given the apparent young age of the animal, it may have been Nikita's cub. On August 28, 2021, a mountain lion I believe to be Nikita was struck and killed by a vehicle as she left the Canyon Hills Project boundary. The California Highway Patrol (CHP) recorded the event and uploaded it to the California Roadkill Observation System[4]. The cat was apparently struck on the edge of the 210-W, its body was located just west of the La Tuna Canyon onramp, within 30 feet of the Canyon Hills Project boundary. Just 14 hours later, CHP documented another lion vehicle-strike less than 1.3 miles west of the Project site, at a location directly accessible from the Canyon Hills Project site via the narrow strip of habitat connecting it to Big Tujunga Wash. I suspect that this might have been another one of Nikita's cubs. These combined incidents account for all documented mountain lion vehicle strike fatalities in the Verdugo Mountains that I am aware of, the location of these incidents underscore the importance of this location as a critical passageway for lions and other wildlife.

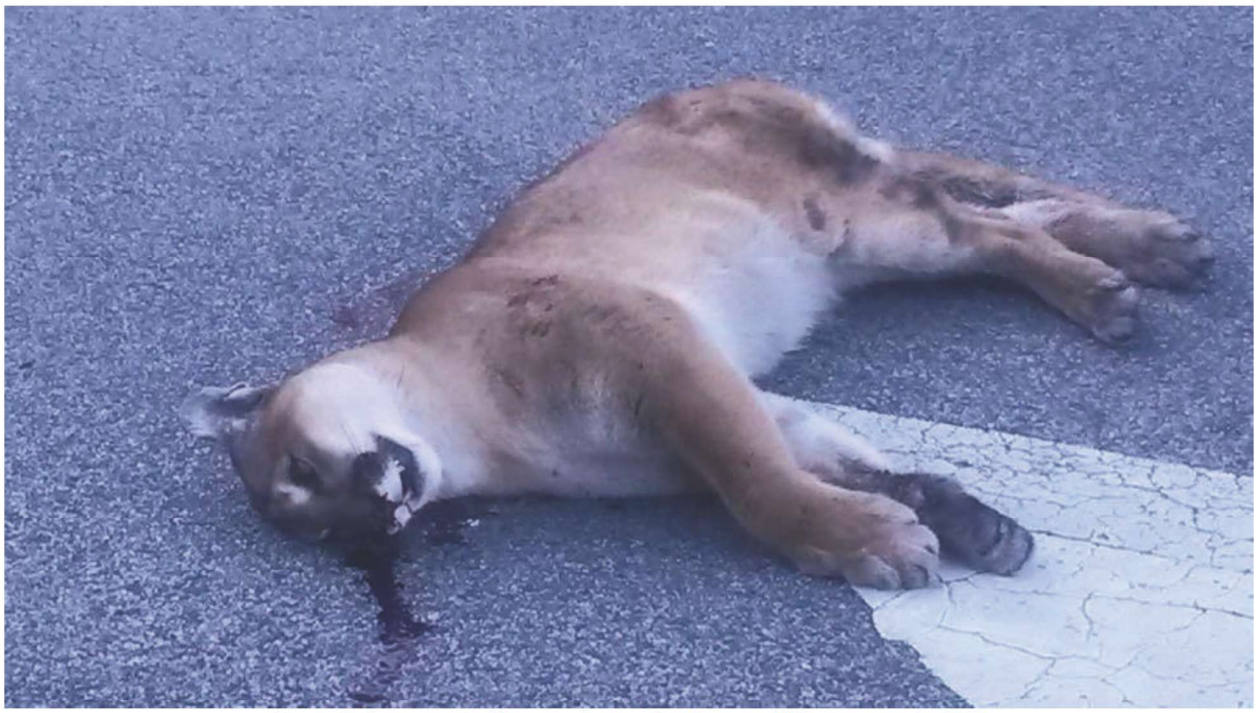

Figure 3: A mountain like struck near the Canyon Hills property in 2015

[2] https://wildlifecrossing.net/california/observations/3005
[3] https://www.flickr.com/photos/santamonicamtns/32159817330/in/album-72157673424284068/
[4] https://wildlifecrossing.net/california/observations/153093

Established Impacts to Wildlife Connectivity and Habitat

According to the County of Los Angeles General Plan (2012, Appendix E) and the NPS Rim of the Valley Study (2015), the Verdugo's provides a potential ecological steppingstone between the Santa Monica Mountains and the San Gabriel Mountains. Genetic interchange, by way of this linkage, is important in perpetuating the genetic variability in isolated populations, and the maintenance of healthy ecosystems. Mountain lions are known to live and successfully reproduce in the Verdugo Mountains. The ecological significance of the project site was clearly defined by the County of Los Angeles in 1991, when it included the project site in the Verdugo Mountains Significant Ecological Area (SEA) No. 40. The baseline data establishing the Verdugo Mountains SEA was subsequently incorporated into the Rim of the Valley Study, along with internal NPS findings, ultimately resulting in the inclusion of the entire Canyon Hills project site, as well as a wildlife corridor connecting the site to the Angeles National Forest, within proposed Rim of the Valley expansion.

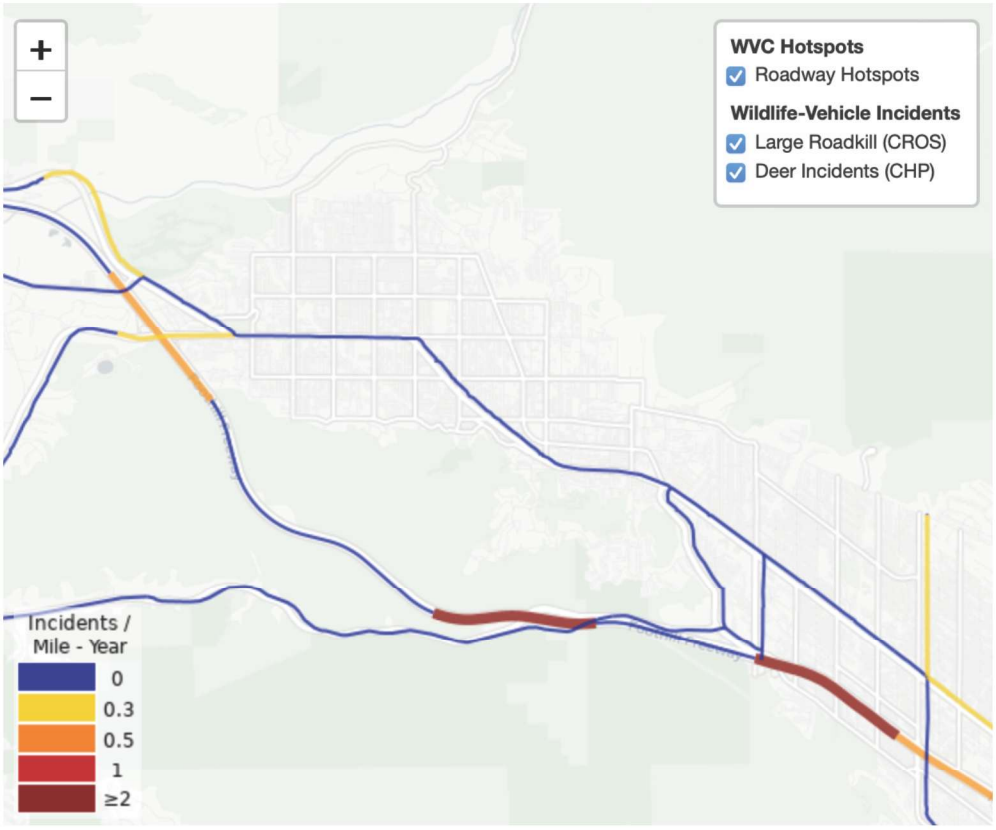

Figure 4: Map illustrating UC Davis (WVC) Hotspots Map of Project Site

This can be plainly seen on the UC Davis Real-time Deer Incidents & Wildlife-Vehicle Conflict (WVC) Hotspots map[5], which highlights the encroachment area as having a high degree of vehicle-wildlife incidents.

[5] https://roadecology.ucdavis.edu/hotspots/map

The available evidence supports NPS findings and demonstrates mountain lions are utilizing the North side of the 210, including the Canyon Hills project site, and that the corridor identified in the Rim of the Valley Expansion, which connects the San Gabriels to the Canyon Hills, is actively utilized by mountain lion, deer, and no doubt other animals. From there, animals can disperse into the greater Verdugo Mountains, though are not without serious risks—as evidenced by repeated vehicle strikes of mountain lions and deer mapped by UC Davis and others.



Figure 5: Photograph of where wildlife vehicle collisions are occurring as intact habitat is divided by the 210; project development area in foreground.

Unconsidered Impacts to Rare Plants, Trees, and Changes to Plant Communities

The California Native Plant Society has already outlined significant impacts posed by the Canyon Hills project directly to the Los Angeles City Council, dated April 5, 2023. Pertinent points are summarized herein along with additional concerns. The adopted F-EIR does not evaluate the presence of multiple species listed on the California Rare Plant Ranks (CRPR) 1B and 4 that have since been identified within the project boundary.

Among these is a fire-follower and narrow endemic named Davidson's bushmallow (*Malacothamnus davidsonii*), classified as CRPR 1B.2. Plants ranked 1B meet the definition of Rare or Endangered under CEQA Guidelines §15125; (c) and/or §15380; therefore, impacts to the species and/or habitat must be analyzed during preparation of environmental documents relating to CEQA. Since the adoption of the F-EIR, two additional fires have burned portions of the Canyon Hills project site, leading to substantial changes in vegetation and species composition. These shifts are highlighted in GLA's 2024 plant community mapping, which contrasts sharply with the original findings of the F-EIR. As of the last estimate in 2004, the project will remove or impact 221 coast live oaks and 28 western sycamores.

Though the City of Los Angeles passed an ordinance in 2006 expanding protections for native trees to include protections to western sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*), and California bay laurel (*Umbellularia californica*), these protections remain unconsidered for the Canyon Hills Project. Additionally, the project will remove dozens, if not hundreds, of *Quercus durata var. gabrielensis* (4.3). Though documented in the 2002-2003 survey, potential impacts to this species were not considered because it was not listed on the (CNPS) Rare Plant Inventory at the time. *Quercus durata var. gabrielensis* is now classified as a CNPS List 4.2. List 4 species are of limited distribution or infrequent throughout a broader area in California and many of them are locally significant. Additionally, impacts to three additional oak species remain unconsidered: *Quercus* wislizeni, *Q. Xewannii*, and *Q. berberdifolia*. The F-EIR claims, "None of the oaks are in a regional movement corridor which minimizes their wildlife habitat value," but provides no substantive evidence to assess this claim, particularly with respect to bird life (continued below).

Impacts to Regional Bird Migration

The F-EIR does not identify impacts to local bird species and does not evaluate potential impacts to bird migration. The Northwestern portion of the Verdugo Mountains has to-date received very little coverage by birders, which indicates potential data bias and gaps are inherent in analyzing potential impacts to birds within the project area. However, similar south facing canyons in the Verdugo mountains have been documented habitat for 100-160+ species, including many migratory birds.[6] The Canyon Hills project site is located ~10 miles southeast of the famous Bear Divide bird migration site, essentially along the presumed flight path of migrants moving along the front range of the San Gabriel Mountains as they make their journey north from Mexico up through California.[7] This globally significant migration corridor was discovered 11 years after the F-EIR was approved. Available evidence suggests that the project will heavily impact intact

[6] eBird (www.ebird.org)

[7] https://www.beardivide.org

chapparal, sage scrub, oak forest, and riparian communities may provide significant stopover habitat for many of these migrants as they head northwest toward Bear Divide.[8]

Impacts to Wildlife Corridor, Connectivity, and Habitat Unaddressed in F-EIR

The ecological significance of the Canyon Hills project site has long been recognized by local agencies, as evidenced by the County's inclusion of the project site in the Verdugo Mountains Significant Ecological Area (SEA) No. 40 in 1991.The Verdugo Mountains serve as a vital ecological steppingstone between the Santa Monica and San Gabriel Mountains, a role highlighted by both the County of Los Angeles[9] and the National Park Service's (NPS) Rim of the Valley Study (2015). Indeed, the NPS is quite certain that P-41 was documented by homeowners less than 200m from the Canyon Hills Property prior to crossing the 210 in 2015 to enter the primary habitat core of the Verdugo Mountains.[10] Additional evidence collected over the past decade further supports the National Park Service's findings, demonstrating that mountain lions, mule deer, and other wildlife are actively utilizing the Canyon Hills project site. In context of the critical corridor identified in the Rim of the Valley Expansion, Canyon Hills encompasses a significant part of the northernmost habitat core that exists both in the Verdugo Mountains, and north of the 21I0. Though the F-EIR denies the presence of mountain lions and a wildlife corridor within the project area, Tony Bomkamp, a senior biologist for Glenn Lukos Associates who prepared portions of the Canyon Hills F-EIR, confirmed the project site as, "*within an area where mountain lions are moving from the San Gabriels to Verdugos*."

In a 2022 discussion with CDFW and CalTrans.[11] In its comments on other Environmental Impact Reports within this corridor complex, the CDFW has previously advised that any activities leading to the reduction, fragmentation, or degradation of habitat value within the habitat core should be deemed significant under CEQA (CDFW letter to City of Pasadena Planning Division, May 9, 2018). In that letter, CDFW further recommende:

> Any proposed unavoidable impacts to the habitat core within the City's lead agency CEQA purview be subject to conditions that will further verify wildlife movement and other habitat use values. Habitat use and impact assessments should be informed by efforts to further document wildlife movement through the habitat core using techniques such as but not limited to camera and tracking stations and radio telemetry conducted, in our opinion, over at least a two-year period.

---

[8] Biological Information for proposed "Canyon Hills" project site, Sunland, California. Prepared by: Daniel S. Cooper, Ph.D. (May 25, 2023)
[9] County of Los Angeles General Plan 2012, Appendix E
[10] Hahamongna to Tujunga Wildlife Corridor Biological Study, Prepared by Kristeen Penrod (2016)
[11] CALTRANS Virtual Roundtable Meeting for CEQA Land Transfer Implication, February 23, 2022 Discussion Agenda EFIS: 0700000064

Increased Flood Risk Unaddressed in F-EIR

CDFW is aware[12] that a comparison of the Los Angeles Flood Risk dataset[13], partly funded by NOAA[14], with the boundaries of the Canyon Hills Project indicates that the project will substantially alter a significant upper La Tuna Canyon flood basin without further hydrologic evaluation. Such modification raises the likelihood of reducing the basin's natural capacity to mitigate flooding—an impact of particular concern given scientific projections that flood events in the region will increase in both intensity and frequency under changing climate conditions.[15] At the same time, the conversion of hundreds of acres to pavement, concrete, compacted earth, and graded surfaces is reasonably expected to reduce groundwater infiltration and substantially increase stormwater runoff into upper La Tuna Creek. Taken together, the combined effect of diminished basin storage and increased runoff presents a significant potential for exacerbated downstream flooding, with corresponding risks to public infrastructure and residential communities further down canyon. Under CEQA, these hydrologic risks constitute potentially significant impacts that must be fully evaluated in the Supplemental EIR.

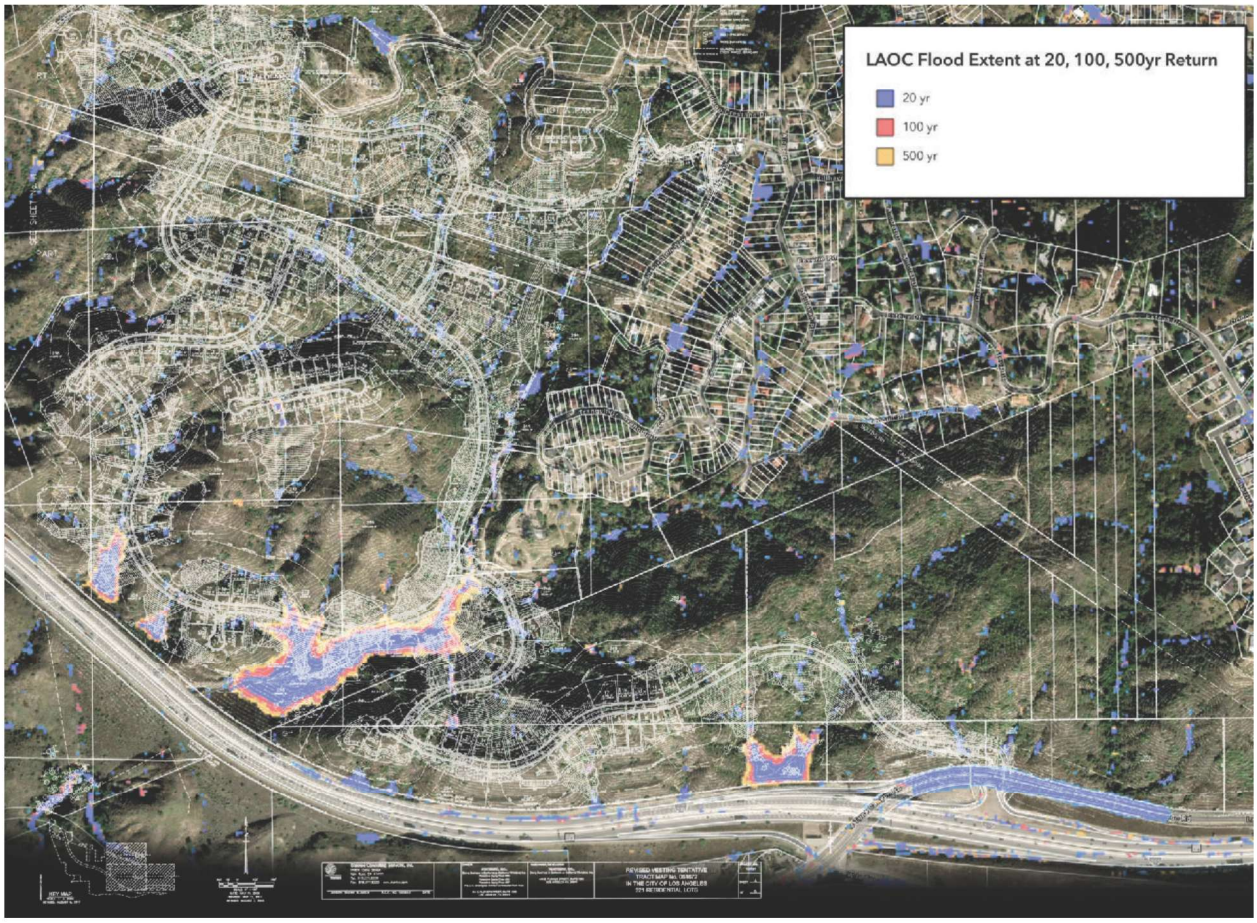

Figure 6: Canyon Hills Development and 20, 50, & 500-year Flood Depths – compaction of earth, grading, and paved surfaces will logically increase peak flow rates.

[12] Email to Victoria.Tang@wildlife.ca.gov on February 4, 2025
[13] https://storymaps.arcgis.com/stories/80af8f6b7b8749258b3305fe5a9d4815
[14] https://news.uci.edu/2022/10/31/uci-flood-modeling-framework-reveals-heightened-risk-and-disparities-in-los-angeles/
[15] https://www.science.org/doi/10.1126/sciadv.abq0995

Wildfire Risk

The Canyon Hills Project site is located entirely within a Very High Fire Hazard Severity Zone, where steep topography, dense vegetation, and limited evacuation routes combine to create severe wildfire risk. Large-scale grading, road construction, and residential development in this landscape would introduce hundreds of new residents and structures into an area that already faces recurrent wildfire, as evidenced by the 2017 La Tuna Fire and subsequent burn events. CEQA requires analysis of the risk of loss, injury, or death involving wildland fire (Guidelines § 15126.2(a)). The conversion of 300 acres of open space into a gated housing development would not only increase ignition sources and structural vulnerability, but would also funnel residents into constrained evacuation routes along La Tuna Canyon Road and the I-210 interchange. These conditions present a foreseeable and potentially significant risk to public safety, emergency response, and community resilience that must be addressed in the Supplemental EIR.

Conclusion

Taken together, the evidence since certification of the 2005 Final EIR and the 2014 Addendum demonstrates that the Canyon Hills Project poses significant, unexamined risks to wildlife, rare plants, ecological connectivity, hydrology, and public safety. The original EIR's categorical denial of mountain lion presence, its failure to evaluate protected plant species and tree ordinances, its omission of bird migration data, its disregard of downstream flood risk, and its silence on wildfire evacuation constraints are all incompatible with CEQA's mandate that environmental documents disclose and evaluate the full scope of significant impacts based on the best available information. CEQA Guidelines § 15162 and Public Resources Code § 21166 make clear that such new information of substantial importance requires a Supplemental EIR that addresses these issues, not willfully avoid them. To limit the current review solely to the impacts on *Bombus crotchii* would misstate the environmental baseline, undermine the integrity of the CEQA process, and expose the Department and the project proponent to significant legal risk. I therefore urge CDFW to require a comprehensive Supplemental EIR that fully evaluates all newly documented impacts, incorporates the scientific record developed since 2005, and ensures that this project is assessed in a manner consistent with CEQA's fundamental purpose: to disclose, avoid, and mitigate significant environmental damage before it is allowed to occur.

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 3:14:44 PM
Subject: FW: Verdugo Hills, Crotch's Bumblebee

Hello,

Please see below.

Thank you!

California Department of Fish and Wildlife

South Coast – Region 5

3883 Ruffin Road

San Diego, CA 92123

P: (858) 467-4201

F: (858) 495-3614

In order to protect a customer's personally identifiable Information (PII), the CDFW license counter is required by management to use secured links for uploading and sending documents or applications containing sensitive customer information. You can call or e-mail to request this link be sent to you. **Any applications or documents sent through the ASKR5 e-mail containing PII will be immediately deleted, and you will be sent a secured link to upload them to.**

If you do not wish to use a secure link, you may also visit our office for processing during the hours of 8:00 – 4:00 Monday through Friday, or you can fax to (858) 495-3614.

Every Californian should conserve water. Find out how at:



SaveOurWater.com · Drought.CA.gov

From: Diego Celaya <diego.celaya@gmail.com>
Sent: Sunday, August 24, 2025 11:50 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Verdugo Hills, Crotch's Bumblebee

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Save the Verdugo Hills. Crotch's Bumblebee has been discovered there. It is an endangered native bee, an important part of our world. Development there would harm it and harm ourselves. Please let it remain wild.

From: "Eduardo Gomez" <eduardoandgo@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 8:50:03 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from eduardoandgo@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Eduardo Gomez

From: "Elena Malone // Secondary History" <mselenamalone@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/23/2025 7:39:20 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,
My name is Elena Malone, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.
First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.
However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.
While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:
Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
Presence of CESA-listed California mountain lions (Puma concolor)

Disruption of critical wildlife corridor (I-210 Freeway crossing)

Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources

Utilities, energy use, and greenhouse gas emissions

Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to

ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Elena Malone
8630 La Tuna Canyon Rd
Sun Valley, CA
91352

From: "Eliza Fleming" <el.fleming7@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 7:50:53 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Eliza Fleming, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Presence of CESA-listed California mountain lions (Puma concolor)

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills

Project.

Sincerely,
Eliza Fleming

From: "Elizabeth Tatum" <tatum_harris@yahoo.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/21/2025 3:33:22 AM
Subject: Canyon Hills ITP Comments

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Since an endangered species of native bee has been found in the proposed development area, the development should not go forward. It's very important to preserve as much environmental habitat as possible in this country.

Thank you.

Elizabeth Tatum
Southern California Resident

From: "Emily Alford" <emilyryanalford@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 4:32:49 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from emilyryanalford@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Emily Alford, and I am writing as a concerned Tujunga resident and community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am DEEPLY concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Emily Alford

From: "Emily Loughran" <emilywloughran@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/18/2025 3:44:50 PM
Subject: Canyon Hills ITP Scoping Comments

[You don't often get email from emilywloughran@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Just say NO to this misguided Canyon Hills project. Our critical pollinator population is in decline and is much more important than building housing that could be built in a less ecologically critical area. We need to also stop encroaching on wildlife habitat and give the mountain lions that use this area as passage the space that they need to survive. Please do a full scope SEIR!!

Emily Loughran
Los Angeles, CA 90049
310-266-6457
Sent from my iPad

From: "Erica Berger" <erica.a.berger@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 5:49:50 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Erica Berger and I am writing as a concerned neighbor and resident of Glassell Park, just south of Glendale and the Verdugo Mountains.

I am writing regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.
First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in

environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Erica Berger

Resident of Glassell Park

--

Erica Berger

http://erica8berger.com

From: "Erin | Berbo Studio" <erin@berbo.studio>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 7:36:59 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear
California Department of Fish and Wildlife,

My
name is Erin Berkowitz and
I am writing as a concerned community member
regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)**
related to the **Canyon Hills Project**
and the proposed **Incidental Take Permit (ITP)**
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

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conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire**
  risk and evacuation limitations

- in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

-

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Erin
Berkowitz

2034 El Molino Ave, Altadena, CA

Erin Berkowitz
Naturalist & Educator

Berbo Studio
www.berbo.studio • @berbo.studio
Sign up for my newsletter: Tinctoria

From: "Evan Stout" <evn.stout@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 7:35:32 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear
California Department of Fish and Wildlife,

My
name is Evan Stout,
and I am writing as a concerned community member regarding
the Notice of Preparation (NOP) for the **Draft**
Supplemental Environmental Impact Report (SEIR)
related to the **Canyon**
Hills Project
and the proposed **Incidental**
Take Permit (ITP)
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
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conditions and public understanding since the original EIR was drafted (2003). These include:

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- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

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- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

-

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Evan
Stout, Glassell Park resident

From: "Evie Maher" <evmaher220@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 10:06:29 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Evelyn Maher, and I am writing as a concerned student and community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
Presence of CESA-listed California mountain lions (Puma concolor)
Disruption of critical wildlife corridor (I-210 Freeway crossing)
Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability
The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Evelyn Maher
California resident of San Diego

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 7:50:35 PM
Subject: FW: Canyon Hills ITP Comment

-----Original Message-----
From: Frank Lyon <frankgilbertlyonii@gmail.com>
Sent: Friday, August 22, 2025 11:24 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP Comment

[You don't often get email from frankgilbertlyonii@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Do everything you can save that endangered bee population! Duhhhhhh.

Thank You.

Sent from my iPhone

From: "Gabriel Buzzelli" <gabrielbuzzelli@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 9:47:17 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from gabrielbuzzelli@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Gabriel Buzzelli

From: "cher ie" <bearsbouncingbiggerbears@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 2:22:06 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from bearsbouncingbiggerbears@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Gabrielle Andersson, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Gabrielle Andersson

Sent from my iPhone

From: "Ian Wellman" <ianwellmansound@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/3/2025 4:07:39 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Ian Wellman, and I am writing as a concerned Pasadena resident regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species**,
  including indirect impacts from habitat fragmentation and development

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Ian Wellman

From: "Bella Gioia" <sbellagioiac@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 5:35:50 AM
Subject: CANYON HILLS ITP - NOP SCOPING COMMENTS

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My
name is Isabella Cavalheiro,
and I am writing as a concerned resident and environmentalist regarding
the Notice of Preparation (NOP) for the **Draft**
Supplemental Environmental Impact Report (SEIR)
related to the **Canyon**
Hills Project
and the proposed **Incidental**
Take Permit (ITP)
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

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- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
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- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of

analysis before the SEIR is finalized.

I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Isabella
Cavalheiro

Native landscaper, orchardist, and determined Los Angeles resident

From: "Issy Cassou" <issycassou@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 11:38:14 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Issy Cassou, and I am writing as a concerned resident and Landscape Architecture student regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

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The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Warmly,
Issy Cassou
Verdugo Woodlands
MLA '26, *College of Environmental Design*
California State Polytechnic University, Pomona
issycassou@gmail.com
icassou@cpp.edu

From: "Jack Brenner" <jackloubrenner@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/27/2025 6:07:49 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Jack Brenner and I am writing as a concerned resident of Tujunga, CA regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

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- **Utilities, energy use, and greenhouse gas emissions**
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The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's

precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Jack Brenner
Tujunga, CA

From: "Jaqueline Dufwa" <jdufwa@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 12:20:58 AM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Jackie Dufwa

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 3:36:02 PM
Subject: FW: Bee habitat

FYI

From: Jaclyn Johnson Stern <jaclyn.johnson@gmail.com>
Sent: Saturday, August 30, 2025 3:20 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Bee habitat

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello!

Sending this your way to support the bees and the other wildlife that is calling this canyon home. Asking for a full scope SEIR!

There are many other animal habitats that are also in danger of being ruined and upended in this decision to move forward with housing. Do we really need more canyon housing with fire risk increasing? Please reconsider and save or bumble bees and other dependent wildlife!

Thank you for our time and attention to this.

Best,

Jaclyn Stern

From: Jana <janavorhis@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 3:16:13 PM
Subject: Canyon Hills Project Impact

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Dear California Department of Fish and Wildlife,

My name is Jana Vorhis and I am writing as a concerned California resident regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, thank you for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban areas.

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- **Utilities, energy use, and greenhouse gas emissions**
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Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Jana Vorhis

San Gabriel resident and recent wildfire survivor

http://www.dysautonomiainternational.org/

From: "Ausra Venckus" <venckusa@gmail.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/21/2025 3:05:59 AM
Subject: Verdugo Mountains Crotch's Bumblebee

You don't often get email from venckusa@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To whom it may concern,

It is so exciting that The Crotch's Bumblebee has been documented in the Verdugo Mountains near La Tuna Canyon by the "No Canyon Hills" group. As a resident of nearby La Crescenta, this valley is dear to my heart and the wildlife make it so special. We take pride in the mountain animals that visit us. Please do what you can to help these endangered native bee species survive in the face of luxury home construction plans in their unique habitat.

Thank you,
Janina Venckus

From: "Jeanine Centuori" <jeanine@urbanrockdesign.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 10:23:49 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Jeanine Centuori and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

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Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Jeanine Centuori FAIA
she/her
Principal | UrbanRock Design
urbanrockdesign.com

670 Moulton Avenue | studio 7
Los Angeles, CA 90031
323-227-0955 | studio
213-595-3608 | cell

From: "Jem Unger Hicks" <jemhelena@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 7:49:54 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Jem Unger Hicks

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 3:08:29 PM
Subject: FW: Canyon Hills ITP Comments

From: Jennifer Celio <jennifercelio@hotmail.com>
Sent: Thursday, August 21, 2025 5:31 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To the California Department of Fish and Wildlife:

I am writing to express my hope that, with the DFW's blessing and/or encouragement, that the recently discovered habitat of the endangered Crotch's bumblebee in Canyon Hills will be entirely set aside as conservation and recreation land. The proposed luxury homes for that area should not be built. Instead, that land should be purchased in its entirety from the owners in order to protect this native bee species and the land itself, for the sake of the ecosystem and so that people may use it for outdoors recreation, like hiking.

Thank you for considering my opinion.

Regards,

Jennifer Celio

JenniferCelio.Weebly.com

From: "Jennifer Clavin" <jenniferclavin@icloud.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/3/2025 6:23:28 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from jenniferclavin@icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Jennifer Clavin, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Jennifer Clavin

Sent from my iPhone.

From: "Jenny Heller Giagni" <jennymheller@hotmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/26/2025 1:33:53 AM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello!

I was pleased to see that you have plans to conduct another environmental impact report surrounding Whitebird Inc.'s luxury home building project above the 210 Freeway in Sunland-Tujunga. With the initial environmental report for this project approved two decades ago (2005), it seems only fair to revisit and see what may have changed since then.

I am especially interested in the impact of the development on the Crotch's bumblebee. I have read that it plays a crucial role in pollinating fire-resistant plants, such as sage and wild buckwheat, in wildfire-prone areas. With wildfires increasing in frequency and severity and the nearby devastation caused recently by the Eaton fire, it seems that this species is more important than ever, and I am all for doing what we can to protect it.

Thank you; I look forward to reading the report.

Best,

Jenny

Jenny Heller Giagni

310.709.2006

jennymheller@hotmail.com

From: Jesse <jholland.eng@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 4:19:17 PM
Subject: Canyon Hills ITP – NOP Scope Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Jesse Holland, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, thank you CDFW for moving forward with a SEIR, an essential step that offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for your time and attention! I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Best,
Jesse

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 4:06:55 PM
Subject: FW: Bee Population Comment

FYI

-----Original Message-----
From: Jessica Dittmar <jessicadittmar@icloud.com>
Sent: Friday, August 22, 2025 8:09 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Bee Population Comment

[You don't often get email from jessicadittmar@icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello,

I've lived in California all my life and something I say without fear of contradiction is that we do not need more 'luxury housing'. We are in a dire situation nationwide, and the last thing anyone should be doing is pandering to the rich so they can have an extra home in our wild areas.

Moreover, bees have been dying at incredible rates due to human activity. We should be counting every lucky star to have found a healthy hive, and of an endangered species no less!
The fact that this is up for debate is sickening, obviously the bees are our priority.

No new development where our treasured fauna live. Save the bees.

Thank you,
Jessica Dittmar

From: T <kamijewels@gmail.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/20/2025 7:31:20 PM
Subject: Endangered bees

You don't often get email from kamijewels@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Protect the endangered bees and do not build luxury housing on this site!

- Jessica Lin
LA local, born and raised

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 3:08:41 PM
Subject: FW: Canyon Hills ITP Comments

From: Jessica Wood <jessica.wood@gmail.com>
Sent: Thursday, August 21, 2025 8:32 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP Comments

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Leave the bee habitat in the Verdugo hills to the bees. The construction of luxury homes will endanger the bees, and most likely cause significant harm, it is not just the homes, but the traffic and people that come along with the construction. Most people do not like insects in or near their homes, the likelihood of luxury home owners to use pesticides to prevent insects from coming near their homes is high. The bees will be impacted by those chemicals, as will the rest of the ecosystem.

Keep the area wild.

Thank you,

Jessica Wood
Jessica.Wood@gmail.com

From: joannetyue@gmail.com
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 9:56:44 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from joannetyue@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis. They only care about profit.

Thank you,
Joanne Yue

From: "Joel Robinson" <jrobinson@naturalist-for-you.org>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/29/2025 10:12:50 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Joel Robinson, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
- Presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Please confirm via email that you have received my comments and included them in the public record.

Sincerely,
Joel Robinson
5907 E Valley Forge Dr.
Orange, CA 92869
jrobinson@naturalist-fpr-you.org
714-639-8480

From: jacksoupcan@gmail.com
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/4/2025 7:02:11 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from jacksoupcan@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is John Soukup, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
John Soukup

Sent from my iPhone

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 11:23:22 PM
Subject: FW: Canyon Hills ITP Comments

From: Johnny Means <johnny.means1@gmail.com>
Sent: Wednesday, August 20, 2025 4:15 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP Comments

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Hello,

I am writing to express my deep concern for the endangered Crotch's bumblebee and the destruction of it's habitat that would result from the construction of the Canyon Hills Project.

One of Los Angeles County's greatest treasures is its biodiversity. However, many of the species that call our County home are threatened by loss of habitat, pollution and climate change. We need to preserve the region's open space and focus development on infill sites with access to public transit that will not overburden LA's clogged highways with more long distance commuters.

Save the bees!!

From: "Josef Minor" <josef.minor@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 6:21:00 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from josef.minor@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Josef Minor, and I am writing as a concerned environmentalist regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Josef Minor

Sent from my iPhone

From: jforge1331 <jforge1331@yahoo.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/21/2025 1:52:18 AM
Subject: Crotch Bumblebee/Crotch Hills

You don't often get email from jforge1331@yahoo.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Good Evening,

Please provide an opportunity for nature to thrive and do not build new housing in this area. Areas for nature and its creatures need a proper space to thrive. Thanks for your time.

Sincerely,
Josh Forge

Sent from my Verizon, Samsung Galaxy smartphone

From: "Julie Pirrone" <julie@moonblockparty.org>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/13/2025 3:40:57 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from julie@moonblockparty.org. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Julie Edwards, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Julie Edwards

Sent from my iPhone

From: "Juliette Perrault" <julietteperrault@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 12:28:52 AM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from julietteperrault@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Juliette Perrault

From: "k bens" <karinbens@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/11/2025 8:29:18 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from karinbens@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Karin Benson, and I am writing as a concerned environmentalist regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Karin Benson

From: "Karl Hess" <karlhess1983@icloud.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 5:16:15 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from karlhess1983@icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is karl hess, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
karl hess

Sent from my iPhone

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/29/2025 7:17:49 PM
Subject: FW: Canyon hills itp comments

fyi

-----Original Message-----
From: katarina calderon <loscalderons@att.net>
Sent: Friday, August 29, 2025 12:00 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon hills itp comments

[You don't often get email from loscalderons@att.net. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

I am writing in support of new environmental studies needed before a new development is allowed to be built in Verdugo Hills.
The endangered Crotch's Bumble Bee is just one of creatures that makes this place their home.
This particular bumble bee feeds on and pollinates Sage, Buckwheat, and Milkweed (all CA natives) and great fire resistant plants.
Which brings me to another point; do we really need to be building a plethora of homes in yet another fire zone???
This seems like complete madness...
Please leave this beautiful spot well alone for Gods creatures great and small... (what ,if any, thought has gone into keeping both the humans and the local mountain lion population safe)???
Sincerely,
Katarina Vinegrad

"What the caterpillar calls the end, the rest of the world calls a butterfly."
Lao Tsu

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 3:14:18 PM
Subject: FW: DO NOT BUILD IN CANYON HILLS

-----Original Message-----
From: Katie Ng <katieraeng@yahoo.com>
Sent: Wednesday, August 20, 2025 5:14 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: DO NOT BUILD IN CANYON HILLS

[You don't often get email from katieraeng@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello,

Discovery of the Crotch's bumblebee in the Verdugo Mountains by Tuna Canyon Road is only the latest reason NOT to build luxury homes in this area. The environment needs our cooperation if not help, NOT more development. For California to keep any of its natural habitat (which serves as homes for many living things other than humans) we need to stop destroying it. Has climate change been considered in this project inquisition? What is the likelihood and fallout of wildfires in this range? Surely the fires would not be the native control burns, it is far more rational to foresee human involvement being the cause. No life, human or animal or insect, is worth another luxury estate. Again, the bees are just the most recent, sound, and imperative reason to not build in this area. The last thing this state (and the rest of the country, since pollinators help produce fruits and vegetables etc. destined for beyond CA) needs is luxury real estate. Keep plowing over what's left of our home (you know, the planet) and there won't be anything or anyone left, just empty buildings and fake wealth.

Thanks,
Katie Ng

From: "Kate Willhite" <kmwillhite@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 3:09:00 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from kmwillhite@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Katie Perez, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Katie Perez

From: "Katie Tiberi" <kathlyntiberi@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 8:53:21 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To Whom It May Concern,

I'm writing to let you know that the The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource, especially in our current administration. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit. That's not necessarily in the best interest of the people.

I would appreciate a response back to hear what's being done to stop this development and protect our native species and spaces.

Thank you,

Katie Tiberi

From: "Kayani Ostojich" <ostojichkayani@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/30/2025 4:59:44 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Kayani Ostojich, and I am writing as a concerned student studying nature in Los Angeles regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.
First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.
However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.
While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:
- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
- Presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.
Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.
Sincerely,

Kayani Ostojich

OTIS College of Art and Design

From: "Kayleigh Adams" <kayadams@ucdavis.edu>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 9:52:00 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

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To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Kayleigh Adams

From: "Kelley Fodor" <fodorfamilyhome@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 7:57:15 PM
Subject: Canyon Hills ITP - NOP Scoping Comments"

[You don't often get email from fodorfamilyhome@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I have a trap camera in the area that captures bobcat, coyote, rabbits, owls, and many more species that need this wild life corridor.

Not to mention the high probability of wild fires in the area... how are home owners going to afford fire insurance if it's even available?

From: "Kelsey Reckling" <kreckling@g.ucla.edu>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 3:06:13 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from kreckling@g.ucla.edu. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Kelsey Reckling, and I am writing as a concerned ecologist & community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Kelsey Reckling
PhD Student, UCLA
Department of Ecology & Evolutionary Biology

From: "Kerry McLaughlin" <kerry.m.mclaughlin@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 8:47:30 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear CA Department of Fish and Wildlife,

My name is Kerry McLaughlin, I'm writing regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
- Presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

As a concerned resident and years-long enjoyer of the Verdugo Mts, I thank you for the opportunity

to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

--
Kerry McLaughlin
Los Angeles, CA
(415) 412-2722

From: "Kevin Corrigan" <kevin.corrigan@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 2:36:00 AM
Subject: Canyon Hills ITP - NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Kevin Corrigan and I am writing as a concerned community member regarding the Notice of Preparation

(NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the

Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

Presence of CESA-listed California mountain lions (Puma concolor)

Disruption of critical wildlife corridor (I-210 Freeway crossing)

-
-
-
-
-

Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources

Utilities, energy use, and greenhouse gas emissions

Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Kevin Corrigan

From: "Kevin Fistanic" <kevinfistanic@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 3:36:29 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Kevin Fistanic, and I am writing as a concerned scientist and Los Angeles resident regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
Presence of CESA-listed California mountain lions (*Puma concolor*)
Disruption of critical wildlife corridor (I-210 Freeway crossing)
Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Kevin Fistanic

Cell: (310) 433-4503
kevinfistanic@gmail.com

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 5:03:43 PM
Subject: FW: LA's native bees

Hi CEQA Team,

Please see the email below.

Thank you,

Garrett Marsh

California Department of Fish and Wildlife

South Coast – Region 5

3883 Ruffin Road

San Diego, CA 92123

P: (858) 467-4201

F: (858) 495-3614

In order to protect a customer's personally identifiable Information (PII), the CDFW license counter is required by management to use secured links for uploading and sending documents or applications containing sensitive customer information. You can call or e-mail to request this link be sent to you. **Any applications or documents sent through the ASKR5 e-mail containing PII will be immediately deleted, and you will be sent a secured link to upload them to.**

If you do not wish to use a secure link, you may also visit our office for processing during the hours of 8:00 – 4:00 Monday through Friday, or you can fax to (858) 495-3614.

Every Californian should conserve water. Find out how at:

Save Our Water

SaveOurWater.com · Drought.CA.gov

From: Kiel Hasinsky <kiel.hasinsky@gmail.com>
Sent: Friday, August 22, 2025 10:00 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: LA's native bees

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

My name is Kiel and I've been a socal resident my entire life. So often in the struggle against climate catastrophe we hear the phrase thrown around "save the bees". But most people only think about our invasive European honey bee. European honey bees did not evolve in our landscape for millennia to become keystone species and aren't fundamental to the ecology of our habitats. Who is? Native wasps and bees like the endangered Crotch's bumblebee. We do not need to continue development in ecological zones for more unaffordable housing that will remain vacant or burn down in the coming years. We're not in a housing crisis we're in a greed crisis. I oppose the development plan of Tuna canyon.

Sincerely

A tired community member

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 3:43:29 PM
Subject: FW: Canyon Hills ITP Comments

FYI

-----Original Message-----
From: Kimberly Loftus <kimb.loft@gmail.com>
Sent: Sunday, August 24, 2025 10:11 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP Comments

[You don't often get email from kimb.loft@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I am a resident near La Tuna Canyon and I am submitting a public comment regarding the documented sighting of an endangered bee in my area.

This land should be conserved for wildlife protection, as the endangered Crotch's Bumblebee deserves to be preserved.

Thank you for your time.

From: "Kyle Courtney" <k.pcourtney@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 9:24:52 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,
Kyle Courtney

From: "Kylie Obermeier" <kylie.obermeier@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/26/2025 10:34:10 PM
Subject: Canyon Hills ITP – NOP Scoping Comment

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Kylie Kiyomi Obermeier, and I am writing as a concerned neighbor and engaged member of the greater LA area ecosystem regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I am grateful that the CDFW is conducting a Supplemental EIR—this is a necessary step to make up for the initial EIR, which is 22 years outdated and failed to holistically analyze the environmental impact of the Canyon Hills project. This SEIR desperately needs to to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I believe the current scope of the SEIR as outlined in your NOP is severely short-sighted--solely evaluating impacts on *Bombus crotchii*, when the project footprint spans over 300 acres of critical wildland and impacts countless well-documented and already currently threatened members of our precious chaparral mountain ecosystem, like the CA mountain lion.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species**,
  including indirect impacts from habitat fragmentation and development
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is thoughtful, thorough, and truly captures the current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. The CFDW has a responsibility to steward California's precious remaining natural ecosystems and protect them from the grasp of developmental greed. We are depending on the CFDW to stand up for the plants and creatures of the Verdugos, a vital urban wildlife corridor, and for those who care about them but have less bureaucratic power.

Sincerely,

Kylie Kiyomi Obermeier
Resident of Highland Park / Eagle Rock - 2033 N Ave 52, 90042
kylie.obermeier@gmail.com
Comrade & Collaborator of No Canyon Hills

From: "Lara Hoad" <lhoad@otis.edu>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/27/2025 3:46:29 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Lara Hoad, and I am writing as a concerned faculty member teaching classes about nature in Los Angeles regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.
However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:
- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.
Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon

Hills Project.

Sincerely,

Lara Hoad

Senior Lecturer
OTIS College of Art and Design

LARA HOAD AIA LEED AP
Senior Lecturer
Otis College of Art and Design
+1 310 773 6674
Zoom ID 927 242 0253
lharchitecturedesign.com
@larahoad
@larahoadarchitecturedesign

From: "Laurel Golden" <laurelgolden@sbcglobal.net>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/30/2025 3:01:07 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Laurel Golden and I am writing as a concerned resident of Orange County regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Laurel Golden

3262 Washington Ave

Costa Mesa, CA 92626

From: "Lauren Jordan" <laurenejordan@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/3/2025 3:29:29 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from laurenejordan@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Lauren Jordan, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Lauren Jordan

From: "Leslie Robinson" <leslierobinson462@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/29/2025 10:30:24 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear
California Department of Fish and Wildlife,

My
name is Leslie Robinson,
and I am writing as a concerned environmentalist regarding
the Notice of Preparation (NOP) for the **Draft**
Supplemental Environmental Impact Report (SEIR)
related to the **Canyon**
Hills Project
and the proposed **Incidental**
Take Permit (ITP)
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While
the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental
conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire**
  risk and evacuation limitations

- in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

-

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Leslie
Robinson

From: "moaddeli family" <moaddeli.family@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/18/2025 11:30:06 PM
Subject: Bumblebee protection

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Regarding the case of Canyon Hills, there is no benefit to building a luxury private development in a wildfire prone hillside that outweighs the consequence of destroying vital habitat for an endangered and protected species. No building please!!!

Thank you,
Linda Miller
Los Angeles

From: svanderlip@aol.com
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/3/2025 4:03:51 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,
My name is Linda Susan Vanderlip, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.
However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.
While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)

  (NOTE: I am especially concerned about this as I live 1 mile from this property and was evacuated in 2017 when it burned as well as completely burning Peters Canyon National Park adjacent to it to the ground.)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Linda Susan Vanderlip
174 S Stonebrook Dr
Orange, CA 92869
Svanderlip@aol.com
No Orange Heights

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 3:37:31 PM
Subject: FW: Do not develop LA's Wild Verdugo Mountains

See below.

Thanks!

From: Liz Slome <lslome1234@gmail.com>
Sent: Sunday, August 31, 2025 2:04 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Do not develop LA's Wild Verdugo Mountains

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I am Liz Slome. I want to express that I am firmly against development in this area, ESPECIALLY because of the native endangered bee populations that have been identified as residing in the proposed development area. Furthermore, that area is free of development, is home to hiking trails, and has other wildlife that would be displaced by developing. Not every place needs to be developed, and efforts should be more focused on building upwards in existing areas. This development does nothing to combat southern California's urban sprawl, and will contribute to more road congestion and traffic for that area.

Thank you

Liz

From: "Loren Klick" <loren.klick@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 4:36:41 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Loren Klick; I'm writing as a concerned California resident and ISA Board Certified Master Arborist. My work focuses on preservation of trees, particularly keystone species like oaks which prop up entire ecosystems.

My email is regarding the Notice of Preparation for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's bumble bee.

While the supplemental EIR is a good step, the scope to focus solely on the bee is too limited. This is a vast site with use by mountain lions and home to a critical wildlife corridor across the 210 (such as it is). With such a vast site of 300+ acres, more work is needed.

I urge you to expand the scope of the SEIR to include the wider issues at stake with the nature of this development in wildland. Our understanding of the plant communities of the Verdugo Mountains has grown since the original EIR was prepared in 2003. For example, the guiding botanical document, Vascular Flora Of The Verdugo Mountains And San Rafael Hills, Los Angeles County, California, was published in 2013. Of course, the project site was not part of the study area, which focused on public land, but it stands to reason this area may likewise host plants protected by the CESA.

Plants potentially found near the project area that are protected by CESA:
- Berberis nevinii (Verdugos and Tujunga)
- Chorizanthe parryi var. fernandina (Verdugos and Tujunga)
- Dodecahema leptoceras (Verdugos and Tujunga)

Thank you for your consideration.

Sincerely,
Loren

From: "Lorraine S" <rain537@hotmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 12:36:14 AM
Subject: Verdugo Mountains

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Please don't continue the killing of our beloved bees. They are vital to our very survival. The continual habitat destruction needs to stop, but just for the endangered bees, but all of our wildlife.

Thank you,

The Summers Family
Verdugo Glenwood Oaks since 1965

Sent from my T-Mobile 5G Device
Get Outlook for Android

From: "Mandakini Swamy" <mks0587@gmail.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/21/2025 2:35:50 AM
Subject: Canyon Hills ITP Comments

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Hi,

I'd like to submit my comments/concerns about the proposed plans to build luxury housing in the canyon hills area. I've been reading about the Crotch's Bumble Bee that has been found in the proposed area and want to express my vehement opinion against proposed housing in that range.

I would also like to express support in keeping that area untouched and as a reserve. In this state of climate change and uncertainty, we need to do all we can to support and keep safe our native pollinators.
Thank you.

Best,

Mandakini Swamy
310-882-0296

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/29/2025 7:16:36 PM
Subject: FW: Canyon hills ITP comment

-----Original Message-----
From: Marcela Leal <lealmarcela15@gmail.com>
Sent: Friday, August 29, 2025 11:55 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon hills ITP comment

[You don't often get email from lealmarcela15@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To whomever it may concern,

I believe there is plenty of evidence that indicates building in canyon hills is not only unsafe but not in line with this state's history of conserving the unique biospheres found within its borders.
Given the trajectory of rising temperatures and increasing wildfires, building any housing in the canyon hills area may be unsafe.
Additionally, given the importance of certain species found in the area, including the endangered and endemic Bombus crotchii bee, allowing the construction of something as vapid and unnecessary as luxury housing should be seriously reconsidered.

Thank you.

From: "Andrea Loreto De Vera" <mdevera@student.otis.edu>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/28/2025 1:00:00 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Maria Andrea De Vera, and I am writing as a concerned student studying nature in Los Angeles regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat. While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
- Presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations. Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Maria Andrea De Vera

From: "Mia C" <fatluck33@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/3/2025 4:48:25 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Maria Chambers , and I am writing as a concerned environmentalist regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Presence of CESA-listed California mountain lions (Puma concolor)

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills

Project.

Sincerely,
Maria Chambers

P.S. yes, this is a form email, but it highlights most of my concerns about this issue. It's imperative that we know more about even humble bees, because everything in the environment is connected and affects us as a whole species. We can't keep "operating as usual" there's a future that we impact and it's coming at us even faster. We need all of our pollinators, not just the ones that make honey, especially now that even common honey bees are at high risk from disease and colony collapse due to exposure to neo-nicatoids.

From: "MC Macadar" <mcmacadar@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 8:46:24 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Marie Claire, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Marie Claire Macadar

From: "Marthine Satris" <msatris@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 4:19:45 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,
My name is Marthine Satris and I am writing as a concerned environmentalist regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.
First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.
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While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:
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Presence of CESA-listed California mountain lions (Puma concolor)

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Tribal Cultural Resources

Utilities, energy use, and greenhouse gas emissions

Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to

ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Marthine Satris

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 6:21:35 PM
Subject: FW: Canyon Hills ITP Comments

Please see the email below.

Thank you,

Garrett Marsh

California Department of Fish and Wildlife

South Coast – Region 5

3883 Ruffin Road

San Diego, CA 92123

P: (858) 467-4201

F: (858) 495-3614

In order to protect a customer's personally identifiable Information (PII), the CDFW license counter is required by management to use secured links for uploading and sending documents or applications containing sensitive customer information. You can call or e-mail to request this link be sent to you. **Any applications or documents sent through the ASKR5 e-mail containing PII will be immediately deleted, and you will be sent a secured link to upload them to.**

If you do not wish to use a secure link, you may also visit our office for processing during the hours of 8:00 – 1:00 Monday through Friday, or you can fax to (858) 495-3614.

Every Californian should conserve water. Find out how at:

Save Our Water

SaveOurWater.com · Drought.CA.gov

From: maryone66 <maryone66@gmail.com>

Sent: Thursday, August 21, 2025 11:03 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello and to whom it may concern,

I'd like to submit a public comment regarding the proposal of luxury homes being built on native bee habitat in the Verdugo Mountains. The Crotch Bumblebee is an endangered species and southern California benefits from protecting all native species small and large. As a lifelong, 3rd generation, nearby resident I have witness our local and greater landscape change since the 1980's. We are at greater risk of fires more than ever and building these homes only adds to that potential to burn.

I urge the decision makers to reject luxury homes when our greater Los Angeles is in need of affordable housing. A small species matters to the entire ecology and what makes Verdugo Mountains and surrounding mountains so beautiful. California attracts numerous visitors because of its natural beauty, not overt development.

By saving the bees you also save numerous other species, habitat and ecosystem that are more crucial than ever for our collective survival. Thank you.

Sincerely,

Mary Ann Martinez

Resident, City of San Fernando, 91340

From: "Matt Walker" <matt.d.walker@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 9:03:05 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

The Verdugo mountains are critical to the survival of the Crotch's Bumble Bee, a native California bumblebee. 200 luxury homes will destroy their habitat and drive towards their extinction. We already have a collapsing honey bee population. The Crotch's bumblebee is a prolific pollinator and requires protection. Please prohibit the building of 200 totally unnecessary "luxury" homes that will destroy their habitat.

Thank you

Matt

Matt Walker
matt.d.walker@gmail.com

From: "Mateo Altman" <mattaltman@mac.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 11:56:22 PM
Subject: Canyon Hills ITP – NOP Scoping Comments
Attachments: Canyon HIlls Project letter 10-9-24 (2).pdf

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Dear Department,

I am writing today to submit comment regarding the Canyon Hills ITP EIR Scoping. I'm writing as the co-director of a Los Angeles land care research initiative, Concerning Landscape.

Our organization submitted evidence to Kelly Schmoker, Victoria Tang, Jennifer Turner, Kevin Takei, Steve Gibson and others of QTY (2) Southern California Mountain Lions documented on the 'Canyon Hills' Project Site. We also submitted evidence of cougars in the broader Project Area of the Verdugo mountains. Further, there are sightings dating back to the early 2010s including the collaring of P41 by the National Park Service. These were addressed by the Department in relation to the Canyon Hills project in 2021/2022.

A member of the department, Erika Cleugh, noted in 2021 that the Canyon Hills Project EIR does not represent current conditions and states that **"Mountain Lions are not found in the study area or any portion of the Verdugo Mountains."**

Multiple conservation organizations have written letters detailing mountain lions using the Verdugo Mountains (Canyon Hills Project Area). These include the Center for Biological Diversity and the Arroyos Foothills Conservancy (see attached).

As mountain lions are a CESA protected species and are a concern of the department, as shown in multiple PRA documents attained by our organization, I am writing to ask that you please address and include this species — Puma concolor, the Southern California Mountain Lion, aka the Cougar — in any Draft EIR for the Canyon Hills project.

Thank you,
Matthew Altman

Arroyos & Foothills
CONSERVANCY

P.O. BOX 1
PASADENA, CALIFORNIA 91102
WWW.ARROYOSFOOTHILLS.ORG
626.796.0782

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Kyle Cavazos
Program Coordinator

Maya Wali-Richardson
Communications/Development Coordinator

Ruby Siehl
Urban Wildlife Research Leader

10/9/2024

Tim Daly, CDFW Information Officer, South Coast Region: Tim.Daly@wildlife.ca.gov
Kevin Takei, Office of the General Counsel: Kevin.Takei@wildlife.ca.gov
California Department of Fish and Wildlife
South Coast Region Headquarters
3883 Ruffin Rd, San Diego, CA 92123

Re: Canyon Hills Project, 7000-8000 La Tuna Road

Dear California Department of Fish and Wildlife Staff,

Formed in 2000, the Arroyos & Foothills Conservancy (AFC) works with urgency to identify, conserve, enhance and steward critical natural habitats and wildlife corridors of the San Rafael Hills, Verdugo Mountains and foothills of the San Gabriel Mountains between Tujunga Wash and Altadena, and to link them to the Santa Monica Mountains at Griffith Park. Our overarching goal is to restore biodiversity throughout our Los Angeles region.

We understand that the Canyon Hills Project conducted an Environmental Impact Review in 2004. The original EIR states, "Mountain lions are not found in the Study Area [Project site] or any portion of the Verdugo Mountains. Therefore, regional movement by the mountain lion within or through the Study Area does not occur." We now know that CESA candidate species, *Puma concolor,* have been documented in the project area. Additionally, the project area functions as a critical chokepoint in wildlife passage within the Verdugo Mountains, allowing wildlife to access the underpass at La Tuna Canyon and avoid needing to traverse the 210 freeway.

With this evidence, we encourage CDFW to require a supplemental EIR to accurately assess the potential impacts on the environment this project would have.

Wildlife Corridor

Arroyos & Foothills Conservancy has been working with CDFW from our inception in 2000: we prepared the biological study that was adopted as the Altadena CAPP in 2008 and pursuant to it acquired land in Rubio in 2011 and Millard Canyon in 2012.

At CDFW's suggestion, and partial funding by the Santa Monica Mountains Conservancy, we initiated a CAPP for the Verdugo Mountains, San Rafael Hills and potential wildlife connectivity to the San Gabriel Mountains. Science & Collaboration for Connected Wildlands prepared the biological study which became the Eastern Rim of the Valley Conceptual Area Protection Plan in 2017.

In 2018, CDFW granted us Prop 1 funding to acquire a property serving as the only wildlife corridor in and out of the San Rafael Hills at the Arroyo Seco in Pasadena.

The Canyon Hills development lies in a critical wildlife passage area within the Eastern Rim of the Valley area - a regional wildlife movement, live-in habitat corridor and linkage complex that includes the Verdugo Mountains/San Rafael Hills (habitat core). The habitat core facilitates the maintenance of biological diversity and healthy populations of plants and wildlife by allowing genetic flow (movement) between the habitat core and other adjacent areas of large expanses of natural open space.

The Verdugo Mountains, including the area of the Canyon Hills development, are part of this habitat core - considered a sensitive resource by CDFW because they are largely surrounded by urbanization and is extremely vulnerable to continued fragmentation and local extirpations of wildlife species such as mountain lion that require large areas of habitat to sustain viable populations.

In comments to other Environmental Impact Reports in this corridor complex, CDFW previously recommended that any activity that could result in the reduction, fragmentation or other degradation of habitat value within the habitat core be considered significant under CEQA (CDFW letter to City of Pasadena Planning Division, May 9, 2018). In that letter, CDFW further recommended that "any proposed unavoidable impacts to the habitat core within the City's lead agency CEQA purview be subject to conditions that will further verify wildlife movement and other habitat use values. Habitat use and impact assessments should be informed by efforts to further document wildlife movement through the habitat core using techniques such as but not limited to camera and tracking stations and radio telemetry conducted, in our opinion, over at least a two-year period."

We encourage CDFW to require these assessments be done.

Mountain Lions

Over the past year and a half, remote wildlife cameras have documented at least two mountain lions using the development area, including predation on mule deer. [documentation by neighbors of the proposed Canyon Hills development area, along with wildlife photographer, Johanna Turner.] In addition, these two individuals have crossed into and possibly back out of the area south of the 210 freeway and La Tuna canyon. Additionally, Johanna Turner documented a new individual female puma in the Verdugos in 2024. This data was shared with CDFW and the City of Los Angeles in a September 11th letter from Doug Carstens.

Impacts to Mountain Lion: Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). The Project will increase human presence (e.g., new development, public trail access), traffic, and noise as well as artificial lighting during Project construction and over the life of the Project. Most factors affecting the ability of the southern California mountain lion populations to survive and reproduce are caused by humans (Yap et al. 2019). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). Areas of high human activity have lower occupancy of rare carnivores. Mountain lions tend to avoid roads and trials by the mere presence of those features, regardless of how much they are used (Lucas 2020). Increased traffic could cause vehicle strikes. As human population density increases, the probability of persistence of mountain lions decreases (Woodroffe 2000).

Protection under CESA: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit (ESU) of mountain lion in southern and central coastal California as threatened or endangered under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA.

Our research focuses mainly on mountain lions because of their important role as an umbrella species. As a keystone species, the mountain lion regulates populations of other species that, left unchecked, can lead to disruption of the landscape. As an umbrella species, their conservation results in many other species being conserved at the ecosystem or landscape level (Breckheimer, et. al 2014). Securing passage for mountain lions can ensure passage for all wildlife (Mountain Lion Foundation).

This Canyon Hills Project is located in a wildlife corridor where they have recently been documented sightings of a CESA candidate species on the project site. Because the project's impact on mountain lions was not studied under the original EIR and because this project will increase human presence and remove habitat used by mountain lions to live in and move through, in addition to other potentially negative impacts, we encourage the CDFW to order a new Environmental Impact Study examining the project's impact on this specially protected species.

Sincerely,



John Howell
Chief Executive Officer & General Counsel
(626) 796-0782

CDFW letter re: Canyon Hills October 9, 2024

CC:
Victoria.Tang@wildlife.ca.gov
Kelly.Schmoker@wildlife.ca.gov
jennifer.turner@wildlife.ca.gov
Steve.Gibson@wildlife.ca.gov
Erinn.Wilson-Olgin@wildlife.ca.gov
Heather.Pert@wildlife.ca.gov
Eriin.strelich@lacity.org
Maya.zaitzevsky@lacity.org
Vince.bertoni@lacity.org
Binh.phan@lacity.org

From: "Max Duffy" <carairieneduffy@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/31/2025 11:09:36 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Max Duffy, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species**,
  including indirect impacts from habitat fragmentation and development

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Max Duffy
West Covina Resident

From: "Megan Barkdull" <meganbarkdull@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 7:04:10 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Good afternoon,

My name is Megan Barkdull; I am writing as a concerned community member and biologist regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

I want to begin by thanking the CDFW for conducting this Supplemental EIR. This is a critical step toward addressing the outdated and incomplete environmental analysis of a project that was first approved over 20 years ago. This SEIR will offer a long-overdue opportunity to reassess the true, up-to-date environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

Nonetheless, I am seriously concerned by the fact thay the current scope of the SEIR as outlined in your NOP is limited only to evaluating impacts on *Bombus crotchii,* despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted in 2003.

These considerations include:

- Very real wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ), particularly in light of the events of this January.
- The presence of CESA-listed California mountain lions (*Puma concolor*)
- Likely disruption of a critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Impacts to Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's

precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Dr. Megan Barkdull, PhD

Silver Lake, Los Angeles, CA 90026

Meganbarkdull@yahoo.com

From: "Megan 'Moe' Morelock" <bigdawgmoe@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 2:35:59 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Megan, and I am writing as a UC California Environmental Steward and an 18 year resident of Southern California regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the

original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Megan A. Morelock

415 W Rosewood Ave Orange, Ca 92865

UC Climate Stewards \u-10180 ?\u-8381 ?

Sent from my iPhone

From: "Melanie Fontana" <melfontana@live.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/31/2025 10:39:14 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Melanie Fontana Chiappone, and I am writing as a concerned environmentalist regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Melanie Fontana Chiappone

From: "Melody Whiteman" <melodywhiteman96@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 5:26:40 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from melodywhiteman96@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Melody Whiteman

From: "Michael Bartz" <mbartz94@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 6:51:07 PM
Subject: Dear California Department of Fish and Wildlife

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello! My name is Michael Bartz, and I am writing as a concerned resident of the Verdugo mountains surrounding area regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR-this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

Presence of CESA-listed California mountain lions (Puma concolor)

Disruption of critical wildlife corridor (1-210 Freeway crossing)

Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources

Utilities, energy use, and greenhouse gas emissions

Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to

ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Michael Bartz
Glendale community member
mbartz94@gmail.com

From: "Shelly Lewis" <shelly21lewis@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 8:40:21 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

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I have followed the proposal and conditional approval for this development since its inception. The community and infrastructure couldn't support the extra traffic then and we can't now. This is a very high fire zone. How are these new homeowners going to obtain fire insurance? Current residents struggle for that now in less fire prone areas. Now, we have discovered this is a wildlife thoroughfare with endangered species. I agree we need more housing, but not in a high fire hazard area.

Just say no to Canyon Hills

Michele Lewis

From: "Michelle Picca" <michellepicca@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 8:37:47 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Michelle Picca, and I am writing as a concerned wildlife biologist regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
- Presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills

Project.

Sincerely,
Michelle Picca
Michellepicca@gmail.com

From: "Michelle Smith" <michellesmith.dvm@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 5:40:36 PM
Subject: Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

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Dear California Department of Fish and Wildlife,

My name is Michelle Smith, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species**,
  including indirect impacts from habitat fragmentation and development
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Dr. Michelle Smith
2933 N Lincoln St
Burbank, CA 91504

--
Michelle Smith, DVM

From: "Molly Becker" <molly.k.becker@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 8:56:42 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Hello,

I am writing to you as a Los Angeles resident who is concerned about the Canyon Hills development project currently being reviewed by CDFW.

The area up for development has been shown to be an important habitat for the Crotch's bumblebee - a native insect that pollinates fire resistant plants, such as sage and wild buckwheat. There has also been evidence showing that mountain lions inhabit the area proposed to be developed.

This development should not go forward, as it is incredibly disruptive to at risk insects, plants and animals. It is also a fire prone area which is not considerate of the proposed eventual homeowners, especially after the devastating fires we had in January of this year. The developer should instead donate or sell the land to become a protected wildlife area.

Thank you for your time and consideration.

Molly Becker

A Resident of San Fernando Valley

From: "Molly Wertheimer" <mollyrosew@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 1:41:07 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Molly Wertheimer, and I am writing regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) on the Canyon Hills Project and the proposed Incidental Take Permit for Crotch's bumble bee.

I appreciate that CDFW is preparing a Supplemental EIR. The original review is now decades old, and this process is an important chance to reassess the project's impact in one of Los Angeles's most fire-prone and ecologically sensitive areas.

However, I am concerned that the current scope focuses only on Bombus crotchii. The project covers more than 300 acres, including 160 acres of potential bumble bee habitat, and its effects reach far beyond one species. I urge CDFW to broaden the SEIR to reflect today's environmental realities, consistent with CEQA's intent. Issues that should be analyzed include:

- Wildfire risk and evacuation limits in a Very High Fire Hazard Severity Zone
- Impacts on California mountain lions (a CESA-listed species)
- Disruption of the I-210 wildlife corridor
- Cumulative effects on threatened and endangered species from habitat loss
- Tribal cultural resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The NOP and this scoping period are a critical opportunity to ensure the SEIR is thorough and meaningful. I respectfully ask CDFW to use its discretion to expand the scope so the review reflects current ecological conditions and regulatory standards.

Thank you for considering this comment, and for your role in protecting California's biodiversity.

Molly Wertheimer
Los Angeles resident
310.968.6628

From: "Morgan Kieon" <morgankieon17@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/23/2025 3:20:27 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Hello,

I'm writing to submit a public comment to oppose construction in the verdugo mountains. This development will destroy crucial wildlife habitat for mountain lions and crotch's bumblebee - a species that helps pollinate fire resistant plants. But it will also be built in a dangerous fire zone. This city needs more affordable housing not more luxury homes that will ruin the few wild areas we have left and exacerbate climate change.

Thank you for reading,
Morgan Kieon

From: "Morgan Sarno" <morgansarno18@icloud.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 4:17:14 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Morgan Sarno, and I am writing as a concerned community member and environmentalist regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

Presence of CESA-listed California mountain lions (*Puma concolor*)
Disruption of critical wildlife corridor (I-210 Freeway crossing)
Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Morgan Sarno

10520 Woodward Ave. Sunland, CA 91020

From: "Mouna Benbouazza" <mounaben261@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/3/2025 8:34:29 PM
Subject: Comment regarding Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report for Requested Incidental Take Permit for Crotch's Bumble Bee

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Dear California Department of Fish and Wildlife,

My name is Mouna Benbouazza, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

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- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Mouna Benbouazza

From: "Paul Edelman" <edelman@smmc.ca.gov>
To: "Gibson, Steve@Wildlife" <Steve.Gibson@wildlife.ca.gov>
Date: 9/3/2025 10:25:29 PM
Subject: MRCA Canyon Hills ITP NOP letter signed by Chair
Attachments: MRCA comment letter Canyon Hills ITP NOP.pdf

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

I also sent via the portal on the NOP notice.

MOUNTAINS RECREATION & CONSERVATION AUTHORITY
King Gillette Ranch
26800 Mulholland Highway
Calabasas, California 91302
PHONE (818) 878-0886

September 2, 2025

California Department of Fish and Wildlife
Attention: Canyon Hills ITP – NOP Scoping Comments
3883 Ruffin Road
San Diego, California 92123

Via Electronic Mail

Canyon Hills ITP – NOP Scoping Comments
Draft Supplemental EIR for Incidental Take
of Crotch's Bumble Bee – Need for East-West Habitat Linkage

Dear CDFW Staff:
The Mountains Recreation and Conservation Authority (MRCA) owns conservation easements on more than 600 acres of land abutting the subject project (see attached maps). The MRCA is the process of accepting fee title to the same 600 acres from the Desert and Mountain Conservation Authority (DMCA).

The proposed project provides zero east-west habitat connectivity between two large habitat blocks in the portion of the Verdugo Mountains north of the 210 freeway. These habitat blocks are shown as habitat blocks A and B on the attached figure. Block B includes at least 20 acres of additional habitat within the subject project boundary. Block B includes both MRCA and City of Los Angeles open space.

The Final EIR failed to recognize this avoidable, significant project impact of ecologically severing the Verdugo Mountains ecosystem north of the 210 freeway for virtually all wildlife species despite timely EIR comments from the Santa Monica Mountains Conservancy identifying the issue.

To remedy this significant biological impact, which includes severing of Crotch's bumble bee habitat, the project footprint must include an ecologically adequate, permanently protected east-west habitat linkage between habitat blocks A and B. That new habitat linkage can (and presumably must) be bisected by two of the new circulation roads shown in the proposed development, but it must be free of all other structures and infrastructure. It must also be wide enough to support year-round native vegetation conducive to at least the movement and presence of Crotch's bumble bee. The SDEIR must address what the spatial requirements of such a habitat connection must be. Its minimum vegetation composition, must be include a contiguous natural area with a reduced-intensity fuel

modification requirement (except 10 feet on roadsides) that connects to habitat outside of the project- proposed fuel modification areas in blocks A and B. Fortunately, such an east-west habitat linkage can be achieved with only the elimination of a cluster of four houses in the southwest project corner. To be able to strictly abide by the approved, meticulously crafted grading plan, those four lots could be graded as proposed and then be revegetated. Roadside cut and fill slopes can be vegetated with appropriate native species. The project mitigation measures must include the establishment of all necessary Crotch's bumble conducive vegetation in disturbed portions of the linkage.

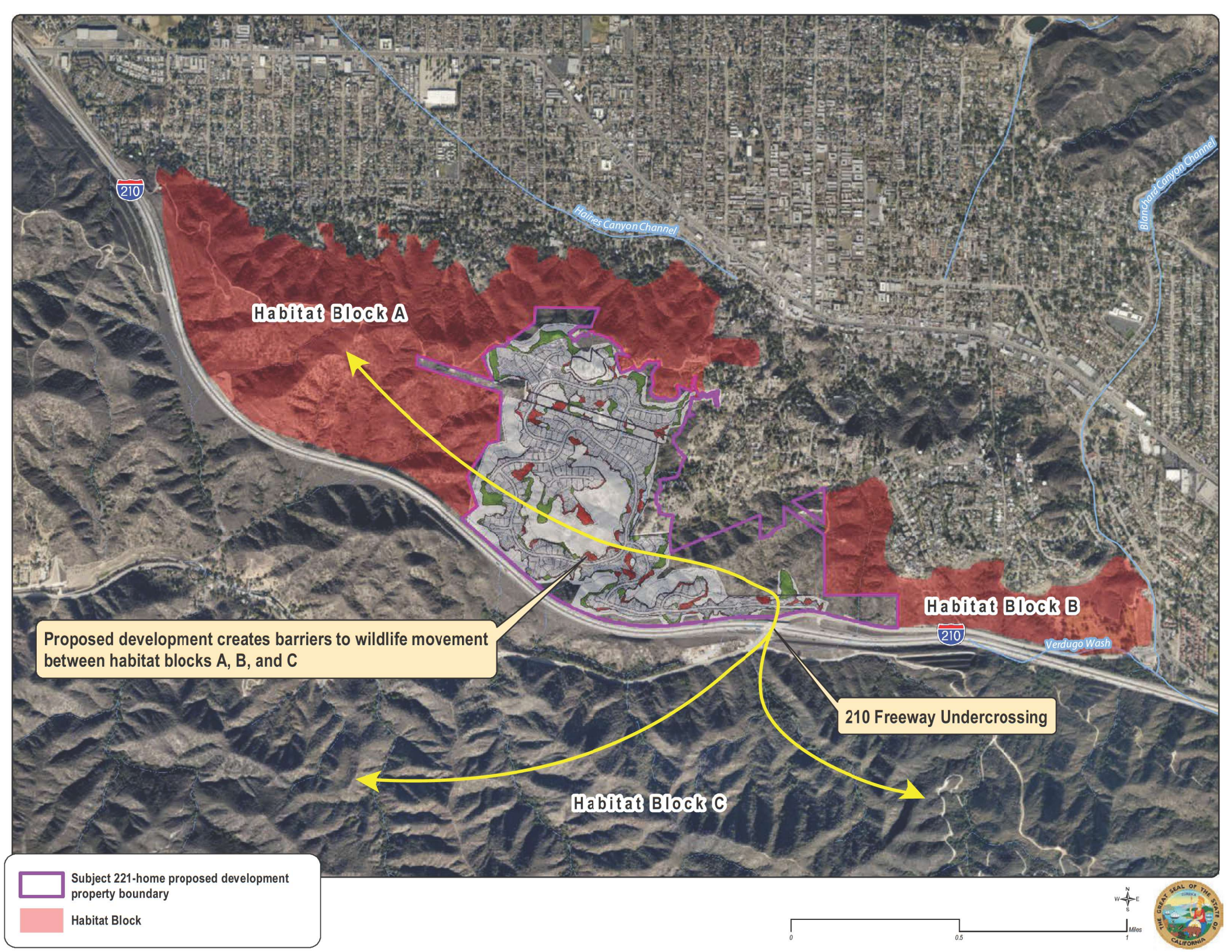
As proposed, the project would result in an avoidable significant adverse impact to continued Crotch's bumble bee presence in the Verdugo Mountains north of the 210 freeway without the inclusion of this above-described habitat linkage design modification permanently integrated into the project. The SDEIR must include an alternative with an equivalently functional east-west habitat linkage for Crotch's bumble bee, or it shall remain deficient.

That habitat linkage would also benefit every other wildlife species in the Verdugo Mountains including the evolutionarily significant listed mountain lion population.
Please address any questions to Chad Christensen, Deputy Chief of Natural Resources and Planning, at chad.christensen@mrca.ca.gov or at 310-589-3230 ext. 121.

Sincerely,



George Lange
Chairperson


Habitat Block A
Habitat Block B
Habitat Block C
Haines Canyon Channel
Blanchard Canyon Channel
Verdugo Wash
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Proposed development creates barriers to wildlife movement between habitat blocks A, B, and C
210 Freeway Undercrossing
Subject 221-home proposed development property boundary
Habitat Block
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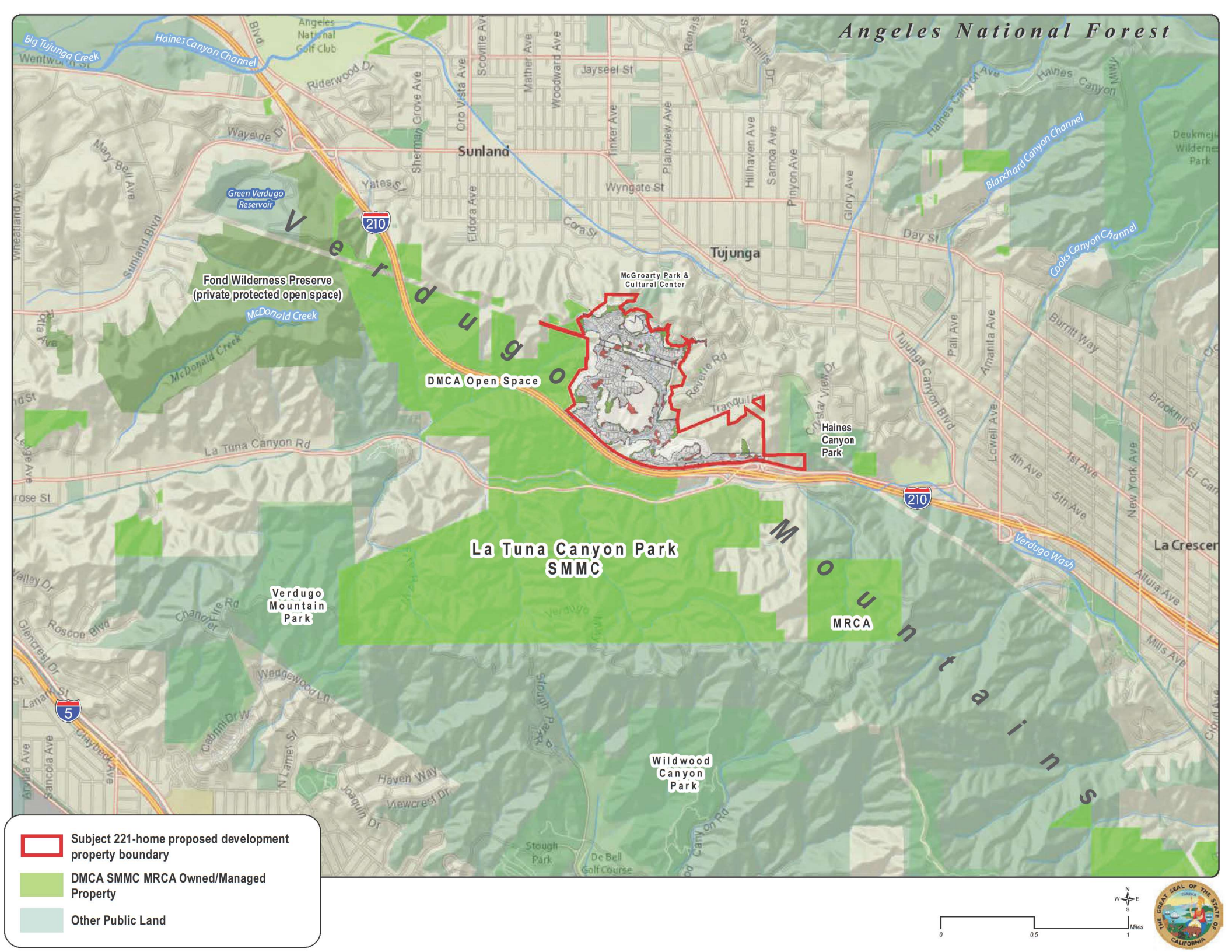
Angeles National Forest
Big Tujunga Creek
Haines Canyon Channel
Angeles National Golf Club
Riderwood Dr
Wayside Dr
Sherman Grove Ave
Oro Vista Ave
Scoville Ave
Mather Ave
Woodward Ave
Jayseel St
Tinker Ave
Plainview Ave
Hillhaven Ave
Samoa Ave
Pinyon Ave
Glory Ave
Haines Canyon Ave
Haines Canyon
Blanchard Canyon Channel
Cooks Canyon Channel
Sunland
Tujunga
Wyngate St
Day St
Yates St
Cora St
Eldora Ave
Mary Bell Ave
Sunland Blvd
Wheatland Ave
Green Verdugo Reservoir
210
Verdugo
Fond Wilderness Preserve
(private protected open space)
McDonald Creek
McGroarty Park & Cultural Center
DMCA Open Space
Revelle Rd
Tranquil Dr
Costa View Dr
Haines Canyon Park
Tujunga Canyon Blvd
Pali Ave
Amanita Ave
Lowell Ave
Burritt Way
Brookhill St
4th Ave
5th Ave
1st Ave
New York Ave
La Crescenta
La Tuna Canyon Rd
La Tuna Canyon Park
SMMC
Verdugo Wash
Altura Ave
Mills Ave
Verdugo Mountain Park
MRCA
Mountains
Valley Dr
Chandler Rd
Roscoe Blvd
Glencrest Dr
Wedgewood Ln
Lanark St
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Claybeck Ave
Cabrini Dr W
N Lamer St
Haven Way
Viewcrest Dr
Joaquin Dr
Wildwood Canyon Park
Stough Park
De Bell Golf Course
Canyon Rd
Subject 221-home proposed development property boundary
DMCA SMMC MRCA Owned/Managed Property
Other Public Land
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Miles

From: "Nate Grossman" <nategrossman@me.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 9:09:11 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from nategrossman@me.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Nathaniel Grossman, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

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- Presence of CESA-listed California mountain lions (Puma concolor)

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Nathaniel Grossman

From: noella1b <noella1b@aol.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/18/2025 6:34:55 PM
Subject: "Canyon Hills ITP – NOP Scoping Comments"

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As a long time Burbank Resident on the other side of the hills, I am concerned with the impact of this for any part of the Verdugo Hills. Developers have long histories of promising one thing and then doing so called "mitigations" before going back on any promises.

We are so blessed to still have hills with wildlife and natural habitat that makes life in a huge area like Southern California really quite special. Can't we leave the bees and animals such as deer and mountain lions live in peace? Why is it so necessary to destroy? The "mitigations" that they will promise just as the "word" they give you means nothing because of the money behind these developers.

Very much against this project and any others that will infringe on the small sections of "wilderness" we have left. Why don't they pick a "slum street" in a metropolitan area to build their housing project. It would be positive in several ways ... first clean up a mess and then upgrade an entire surrounding area.

Noella Ballenger

From: "Nora Healy" <nghealy@icloud.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 6:27:22 PM
Subject: Dear California Dept of Fish and Wildlife,

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Dept of Fish and Wildlife,

My name is Nora Healy, and I am writing as a concerned LA community member regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First - thank you for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations**

-

- Presence of CESA-listed California mountain lions (*Puma concolor*)
- Disruption of critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development
- **Tribal Cultural Resources**

- **Utilities,**
  energy use, and greenhouse gas emissions

- **Climate**
  resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion**to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Nora Healy

From: "Ouida Biddle" <hello@handstudios.net>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/2/2025 8:44:45 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,
My name is Ouida Biddle, I'm a graduate student at Cal Poly Pomona currently working on a task force researching fire prevention practices in the aftermath of the Eaton and Palisades fires.
I am writing regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.
First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.
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Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.
Sincerely,

Ouida A Biddle
MLA 2026 Cal Poly Pomona

Ouida Biddle
H A N D S T U D I O S
(213) 308 - 3850
handstudios.net

From: "Paola .Reyes" <poreyesii@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/3/2025 5:27:30 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from poreyesii@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Paola Reyes, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

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- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Paola Reyes

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 7:33:06 PM
Subject: FW: Canyon hills ITP comments

From: Paris Escobedo <paris.escobedo0426@gmail.com>
Sent: Friday, August 22, 2025 12:22 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon hills ITP comments

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Good evening, I want to use my voice to stand up for the Crotch bumblebees that reside in Tuna canyon road , off the 210 freeway. I strongly believe and recommend that there should be NO action or initiative taken to destroy and build over these bumblebees home that rightfully belongs to them. It's absolutely CRUCIAL that we protect our native bumblebees and in fact- every over species of bees / bumblebees in order to protect our environment and pollinators so we can continue to have a fruitful harvest for both us humans, and as well our wildlife. Especially during a time of major ecological crisis that humans have put upon our earth and nature.. I also strongly believe that we should overall STOP the construction of luxury homes in untouched canyons and valleys in the state of California. Thank you for your time - Paris

From: "Paul Edelman" <paul.edelman@mrca.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/3/2025 10:20:42 PM
Subject: Canyon Hills ITP- NOP Scoping Comments

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MRCA comment letter Canyon Hills ITP NOP.pdf

MOUNTAINS RECREATION & CONSERVATION AUTHORITY
King Gillette Ranch
26800 Mulholland Highway
Calabasas, California 91302
PHONE (818) 878-0886

September 2, 2025

California Department of Fish and Wildlife
Attention: Canyon Hills ITP – NOP Scoping Comments
3883 Ruffin Road
San Diego, California 92123

Via Electronic Mail

Canyon Hills ITP – NOP Scoping Comments
Draft Supplemental EIR for Incidental Take
of Crotch's Bumble Bee – Need for East-West Habitat Linkage

Dear CDFW Staff:
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modification requirement (except 10 feet on roadsides) that connects to habitat outside of the project- proposed fuel modification areas in blocks A and B. Fortunately, such an east-west habitat linkage can be achieved with only the elimination of a cluster of four houses in the southwest project corner. To be able to strictly abide by the approved, meticulously crafted grading plan, those four lots could be graded as proposed and then be revegetated. Roadside cut and fill slopes can be vegetated with appropriate native species. The project mitigation measures must include the establishment of all necessary Crotch's bumble conducive vegetation in disturbed portions of the linkage.

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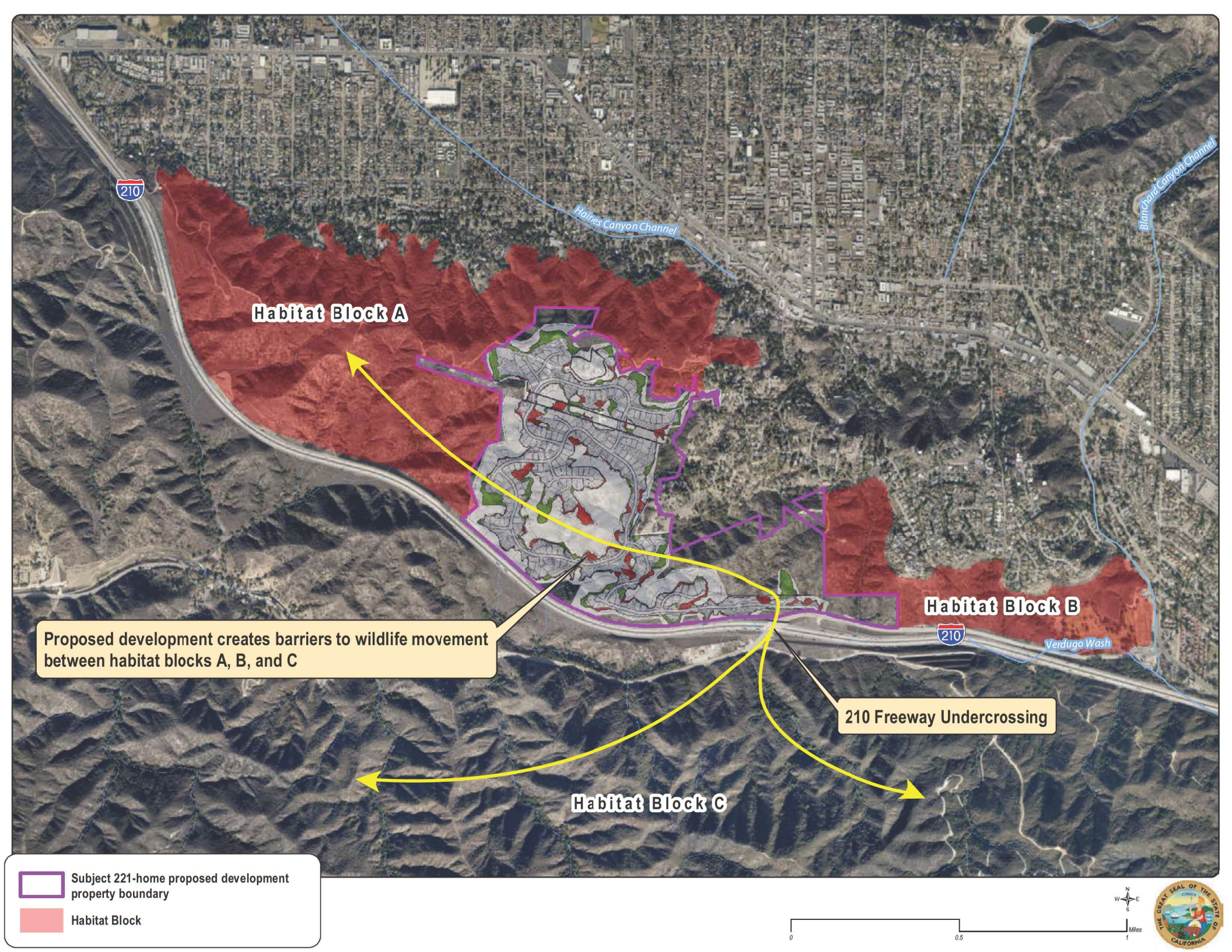
That habitat linkage would also benefit every other wildlife species in the Verdugo Mountains including the evolutionarily significant listed mountain lion population.
Please address any questions to Chad Christensen, Deputy Chief of Natural Resources and Planning, at chad.christensen@mrca.ca.gov or at 310-589-3230 ext. 121.

Sincerely,



George Lange
Chairperson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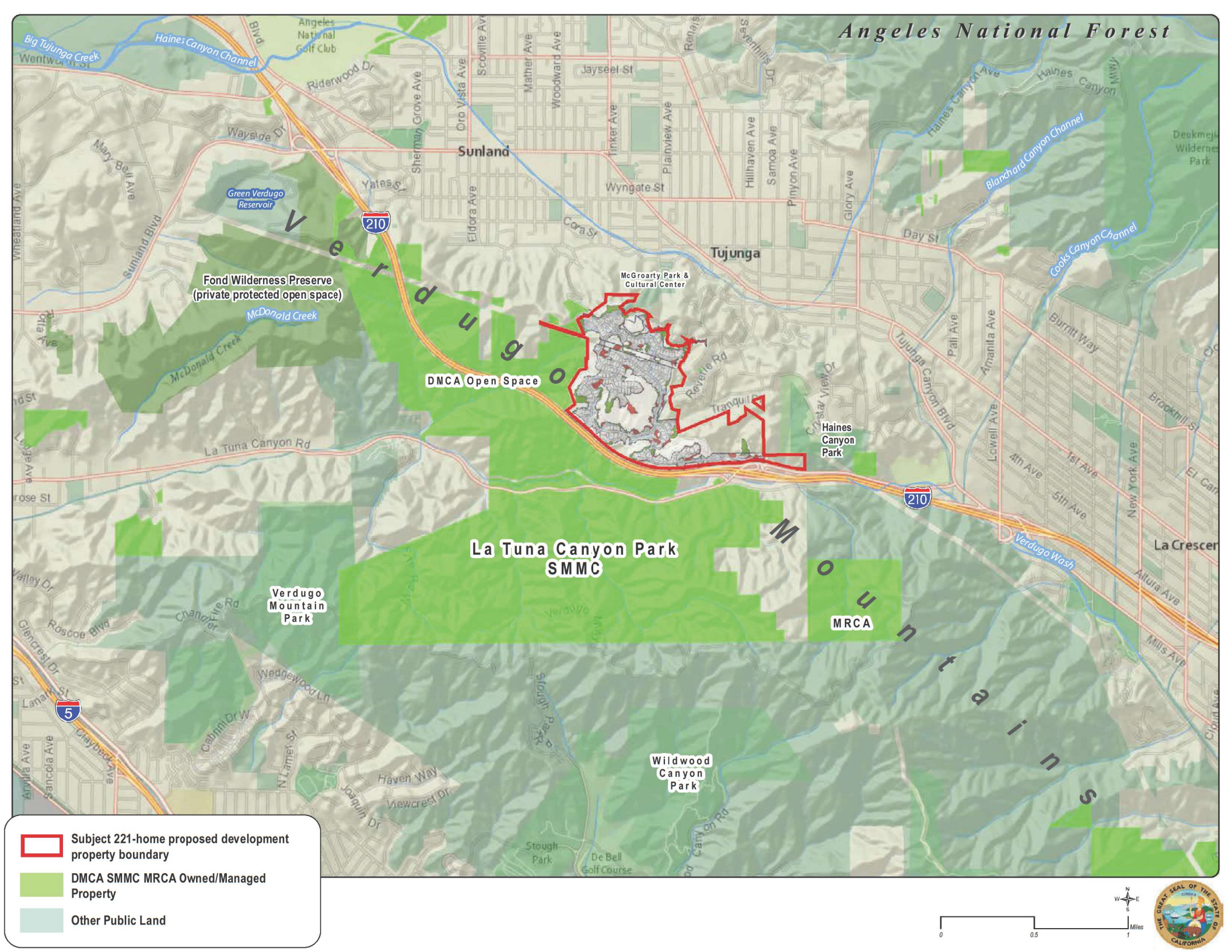
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Costa View Dr
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Tujunga Canyon Blvd
Pali Ave
Amanita Ave
Lowell Ave
Burritt Way
Brookhill St
4th Ave
5th Ave
1st Ave
New York Ave
La Crescenta
La Tuna Canyon Rd
La Tuna Canyon Park
SMMC
Verdugo Wash
Altura Ave
Mills Ave
Verdugo Mountain Park
MRCA
Mountains
Valley Dr
Chandler Rd
Roscoe Blvd
Glencrest Dr
Wedgewood Ln
Lanark St
5
Claybeck Ave
Cabrini Dr W
N Lamer St
Haven Way
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Canyon Rd
Subject 221-home proposed development property boundary
DMCA SMMC MRCA Owned/Managed Property
Other Public Land
N
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0.5
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Miles

From: "Priscilla Johnston" <priscillaojohnston@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 2:58:02 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from priscillaojohnston@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Priscilla Johnston, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

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- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Priscilla Johnston

Sent from my iPhone

From: "Paradise Hill Team" <protectparadisehill@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 8:31:51 PM
Subject: Urgent! Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

We are writing on behalf of the Protect Paradise Hill Team - who cares deeply about the future of our wildlands, our wildlife, and the safety of our communities.

The proposed Canyon Hills Project sits at the intersection of two critical issues facing California: the accelerating loss of biodiversity and the growing threat of catastrophic wildfire. I want to thank CDFW for initiating a Supplemental Environmental Impact Report (SEIR) after decades of inaction. This is a long-overdue opportunity to reassess a project approved under environmental conditions that no longer reflect today's reality.

But I'm deeply alarmed that the current scope of the SEIR is unjustifiably narrow—focused only on the potential impact to Bombus crotchii, while ignoring the broader and more devastating ecological consequences of this project. This is a dangerous oversight.

The Canyon Hills Project spans more than 300 acres of precious wildland—habitat that supports not just the Crotch's bumblebee, but countless other species, including CESA-listed mountain lions. It includes vital corridors for wildlife movement, and it lies in a Very High Fire Hazard Severity Zone. To fail to fully evaluate the cumulative environmental, cultural, and safety impacts of this development would be negligent.

The SEIR must expand its focus to include:

- Fire risk and evacuation limitations in a Very High Fire Hazard Severity Zone
- Impacts to California mountain lions and other listed species

- Destruction and disruption of key wildlife corridors (such as I-210 freeway crossing)
- Habitat fragmentation and cumulative loss of biodiversity
- Threats to Tribal Cultural Resources
- Long-term climate impacts, utility strain, and emissions
- The future sustainability and resilience of this wildland-urban interface zone

We urge CDFW to lead with integrity and courage—acknowledging not just what is legally required, but what is morally and scientifically necessary in this moment of ecological crisis.

California cannot afford another shortsighted approval. The stakes are too high.

Please use the full weight of your discretion to ensure that this SEIR is as thorough, transparent, and ecologically honest as possible. This is your chance to protect a unique landscape and demonstrate that the State of California takes biodiversity, fire safety, and environmental justice seriously.

Thank you for the opportunity to comment.

Paradise hill team

From: "Rachel Grigelis" <rgrigelis@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/18/2025 8:07:17 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Rachel Grigelis, and I am writing as a concerned citizen regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
- Presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife corridor (I-210 Freeway crossing)
- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy use, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Rachel Grigelis
Simi Valley, CA 93063

From: "Rachel LeSage" <rachel.lesage@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/22/2025 1:23:22 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear
California Department of Fish and Wildlife,

My
name is Rachel LeSage,
and I am writing as a concerned resident of Los Angeles County (Culver City)
regarding the Notice of Preparation (NOP) for the **Draft**
Supplemental Environmental Impact Report (SEIR)
related to the **Canyon**
Hills Project
and the proposed **Incidental**
Take Permit (ITP)
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While
the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental
conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire**

- **risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence**
  of CESA-listed California mountain lions (*Puma concolor*)

- **Disruption**
  of critical wildlife corridor (I-210 Freeway crossing)

- **Cumulative**
  impacts on Threatened and Endangered Species,
  including indirect impacts from habitat fragmentation and development

- **Tribal**
  Cultural Resources

- **Utilities,**
  energy use, and greenhouse gas emissions

- **Climate**
  resilience and long-term ecological sustainability

-

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Rachel.lesage@gmail.com

From: "Rachelle Gray" <msrachellegray@gmail.com>
To: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
Date: 8/21/2025 12:45:22 AM
Subject: Canyon hills ITP comments

You don't often get email from msrachellegray@gmail.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To whom it may concern,

Please save Crotch's bumblebee. It is an endangered native California bee species and we do not want it to go extinct. Please don't allow luxury homes, or any other development in the area where the bee was spotted and is presumed to live in. Even better, purchase the land and make a reserve so that Crotch's bumblebee and other species can thrive there. We are losing so many species around the world daily, whatever we can save locally, we are obligated to do so.

Thank you for your concern in this matter.

Rachelle Gray
(805) 746-0458
msrachellegray@gmail.com <mailto:msrachellegray@gmail.com>

From: "Raegan Kirby" <raerae5678kirby@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 5:14:54 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear
California Department of Fish and Wildlife,

My
name is Raegan
Kirby,
and I am writing as a concerned resident and student regarding
the Notice of Preparation (NOP) for the **Draft**
Supplemental Environmental Impact Report (SEIR)
related to the **Canyon**
Hills Project
and the proposed **Incidental**
Take Permit (ITP)
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While
the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental
conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire**

- **risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence**
  of CESA-listed California mountain lions (*Puma concolor*)

- **Disruption**
  of critical wildlife corridor (I-210 Freeway crossing)

- **Cumulative**
  impacts on Threatened and Endangered Species,
  including indirect impacts from habitat fragmentation and development

- **Tribal**
  Cultural Resources

- **Utilities,**
  energy use, and greenhouse gas emissions

- **Climate**
  resilience and long-term ecological sustainability

-

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Raegan
Kirby
356
N. Orange Grove Ave,
Los
Angeles, CA 90036

From: "Rob Wadleigh" <robwadleigh@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 7:21:00 PM
Subject: upcoming SEIR

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Rob Wadleigh, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations**
  in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

-
- **Cumulative impacts on Threatened and Endangered Species**,
  including indirect impacts from habitat fragmentation and development

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely, :Rob

Rob Wadleigh
video | graphico | etcetero
847-571-8911
duelcitizen.net



From: "Robin Erdman" <tonkinette@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 9:29:34 AM
Subject: Canyon Hills ITP NOP Scoping Comments

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Dear California Department of Fish and Wildlife, My name is Robin Erdman, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee. First, I want to thank CDFW for moving forward with a Supplemental EIR. This is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat. While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include: - Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ) - Presence of CESA-listed California mountain lions (Puma concolor) - Disruption of critical wildlife corridor (I-210 Freeway crossing) - Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development - Tribal Cultural Resources - Utilities, energy, and greenhouse gas emissions - Climate resilience and long-term ecological sustainability Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project. Sincerely, Robin Erdman

Yahoo Mail: Search, Organize, Conquer

From: "Ryan Griffin" <ryanjoegriffin@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 11:49:21 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from ryanjoegriffin@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Ryan Griffin, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Ryan Griffin

Sent from my iPhone

From: "Sage Bylin" <waxwingbio@outlook.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 3:23:26 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Sage Bylin, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills

Project.

Sincerely,
Sage Bylin

From: "samantha russell" <samanthacorinne@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 8:30:03 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Samantha, and I am writing as a deeply concerned community member who is urging you to take bold and necessary action regarding the Canyon Hills Project and its proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First and foremost, I acknowledge and appreciate the Department's decision to initiate a Supplemental Environmental Impact Report (SEIR). This step is long overdue. The original approval for this project dates back more than two decades, during which time environmental threats—including wildfire risk, species decline, habitat fragmentation, and climate instability—have intensified dramatically. We cannot rely on outdated assumptions in the face of a new ecological reality.

However, the current scope of the SEIR falls dangerously short. Narrowing its focus to the impact on Bombus crotchii alone fails to capture the full breadth of ecological harm posed by this development. The project footprint spans over 300 acres of critical wildland—160 of which may be occupied by the bumblebee, but many more that are home to diverse and imperiled species, and serve as vital ecological corridors and climate buffers.

CDFW must not rubber-stamp a hollow review. This is an opportunity—your opportunity—to uphold the Department's mandate to protect California's biodiversity and public safety. A responsible SEIR must analyze a wide range of impacts, including but not limited to:

- Catastrophic wildfire risk and evacuation limitations (Very High Fire Hazard Severity Zone)
- The presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife movement corridors (e.g., I-210 freeway crossing)

- Cumulative harm to Threatened and Endangered species via fragmentation and encroachment
- Loss or degradation of Tribal Cultural Resources
- Impacts from utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term sustainability of our wildlands

It is not only appropriate—it is imperative—that the SEIR reflect the full complexity of the environmental, cultural, and public health consequences of this project.

We are not asking for development to stop. We are asking for it to proceed ethically, responsibly, and with the highest level of environmental accountability.

I respectfully request that CDFW exercise its full authority and discretion to expand the scope of this SEIR and ensure the evaluation is meaningful, complete, and protective of our shared natural heritage. This is not just about the bumblebee—it is about the entire ecological web that Canyon Hills supports, and the communities that will be affected by its loss.

Thank you for your attention and for the opportunity to comment. I sincerely hope CDFW stands firm in its duty to the people and wildlife of California.

Sincerely,

Samantha Russell

From: "Samantha Russell" <russelsa23@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 8:33:24 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Hi there,

I'm reaching out as a concerned community member who cares deeply about our open spaces, wildlife, and the safety of our neighborhoods.

I appreciate that the Department is taking a second look at the Canyon Hills Project through a Supplemental Environmental Impact Report (SEIR). This area hasn't had a proper review in over 20 years, and a lot has changed—wildfire risks are higher, more species are endangered, and we know so much more about how important it is to protect these wildland areas.

But I'm really concerned that the current review is way too limited. Right now, it's focused only on one species—the Crotch's bumblebee—which is important, but it's just one part of the puzzle. This development would affect over 300 acres of wild habitat. We're talking about critical wildlife crossings, mountain lion territory, fire-prone hillsides, and more. It's not enough to look at this project in a vacuum.

Please expand the SEIR to cover the full picture, including:

- Fire danger and evacuation limitations (this is a high-risk fire zone)
- Threats to mountain lions and other sensitive species
- Disruption of wildlife corridors (like the I-210 crossing)
- Loss of habitat and cumulative impacts on biodiversity
- Cultural resource protections
- Climate impacts, utility demand, and long-term sustainability

This area deserves a real, thorough review—not just a check-the-box approach. We've seen what happens when development charges ahead without fully understanding the consequences, and we can't afford to make that mistake again.

Thanks for listening and for the work you do. I hope the Department will stand strong for wildlife, public safety, and a more responsible future.

Thank you!

From: "Sara Hamel" <sara.ann.hamel@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 4:50:48 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from sara.ann.hamel@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is Sara Hamel, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Sara Hamel

Sent from my iPhone

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 3:50:52 PM
Subject: FW: Canyon Hills ITP - NOP Scoping Comments

fyi

From: Sarah Parker <parker.sarah9988@gmail.com>
Sent: Saturday, August 23, 2025 10:23 AM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Please require an updated environmental impact report at 7000 La Tuna Canyon Road, Los Angeles, California, on the north side of the 1-210 Freeway. These are luxury homes. They will be built in a fire zone, and when it burns, we will have to put firefighters' lives at risk at the taxpayers' expense to protect these new luxury houses that we built knowing that they should not be there(just to clarify I have no issue protecting homes that people live in I jut do not want more built in areas where they shouldn't be). There are documented endangered pollinators as well as mountain lions. The habitat is different since the La Fortuna wildfire and needs to be reviewed again.

Sarah Parker

From: scarlettbrais@gmail.com
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 3:17:23 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from scarlettbrais@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello my name is Scarlett Brais, and I am a lifelong resident of Los Angeles County. Writing today to express my strong dissent for the development of the Verdugo Mountains. I have just learned of the endangered Crotch Bumblebee species inhabiting the area, and have concerns for other wildlife as well. These animals have lost so much of their habitat already, and it is our duty to protect them and in turn protect our public lands. Do not develop and build in the Verdugo Mountains.

Thank you from a concerned citizen,
Scarlett Brais

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 11:06:05 PM
Subject: FW: Endangered bumble bee protection in Verdugo Mountains

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From: Seth gentry <planetofchaos2000@gmail.com>
Sent: Wednesday, August 20, 2025 3:42 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: Endangered bumble bee protection in Verdugo Mountains

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Greetings

I am writing to state that I am of the opinion that California needs its native bee (and other pollinators species) more than we need more luxury homes.

The proposed building project along Tuna Cyn Road below the 210 has been found to be a habitat for the endangered, native Crotch's Bee population.

I cannot, in good conscience, support any new development that harms endangered wildlife when California is in desperate need of conservation and regeneration of native plant and animal species.

I hope there will be considerable action taken to respond to the voice of the people in this matter. Thank you for your time and attendance to this matter.

Seth Gentry

Los Angeles County Resident

From: "Shari Dalal" <shari_dalal@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/1/2025 1:37:50 AM
Subject: Canyon Hills ITP – NOP Scoping Comments
Attachments: 3385D156-0F07-4EEA-BB7A-69CCCCA200A2.jpeg
BA74DF2C-5DDD-4986-ACCF-5E9AFBBE63E0.jpeg
GN7A1471.jpeg
IMG_9040.jpeg
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WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Shari, and I am writing as a concerned environmentalist regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) for the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's bumble bee.

First, I want to thank CDFW for requiring a Supplemental EIR. This is an essential and long-overdue step, given that the project was first approved more than 20 years ago under an outdated analysis. The SEIR provides a crucial opportunity to reassess the real impacts of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am concerned that the scope of the SEIR is currently limited only to Crotch's bumble bee. While protecting *Bombus crotchii* is critically important—the species has lost much of its historic range—this project's footprint spans over 300 acres of vital wildland, with impacts far beyond a single pollinator.

We know that when pollinators are protected, ecosystems thrive. In Ventura County, for example, conservation efforts for rare native bumble bees have also benefited songbirds, wildflowers, and other pollinators, creating a ripple effect across the landscape. Limiting the SEIR to just one species misses this interconnected reality.

Los Angeles also knows the power of wildlife stories. The late P-22, the famed mountain lion of Griffith Park, became a global symbol of both the fragility and resilience of urban wildlife. His survival in a small habitat patch—surrounded by freeways—showed how much these species depend on safe passage and intact ecosystems. Projects like Canyon Hills threaten to

cut off the very wildlife corridors mountain lions, bobcats, and deer rely on to survive. Radio-collar studies have documented these animals moving through the Verdugo Mountains and across the I-210 freeway. Blocking or fragmenting these pathways has long-term consequences for genetic diversity, road mortality, and species persistence.

For these reasons, I urge CDFW to expand the scope of the SEIR to address the full range of ecological and community impacts, including:

- Wildfire risk and evacuation limits in a Very High Fire Hazard Severity Zone (VHFHSZ)
- Presence of CESA-listed California mountain lions (Puma concolor)
- Disruption of critical wildlife corridors, including the I-210 freeway crossing
- Cumulative impacts on Threatened and Endangered Species, beyond just Crotch's bumble bee
- Tribal Cultural Resources
- Utilities, energy use, and greenhouse gas emissions
- Climate resilience and long-term ecological sustainability

The scoping process exists to ensure environmental review is comprehensive, meaningful, and rooted in current science. I respectfully ask CDFW to use its discretion to require an expanded SEIR that reflects today's ecological realities and safeguards California's biodiversity for generations to come.

Thank you for considering these comments and for your role as steward of California's natural heritage.









From: "Shawnie Wen" <shawniewen@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 3:30:34 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear
California Department of Fish and Wildlife, My name is Shawnie Wen , and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee. First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat. While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include: - Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ) - Presence of CESA-listed California mountain lions (Puma concolor) - Disruption of critical wildlife corridor (I-210 Freeway crossing) - Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development - Tribal Cultural Resources - Utilities, energy, and greenhouse gas emissions - Climate resilience and long-term ecological sustainability Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences
of the Canyon Hills Project. Sincerely, Shawnie Wen

From: "Shea Millan" <shea.meara@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/3/2025 3:45:33 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

My name is Shea Millan, and I am writing as a concerned environmentalist and Southern California resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

I would like to thank CDFW for moving forward with a Supplemental EIR. This is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy use, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
Shea Millan
Shea.Meara@gmail.com

From: "Sherin Bennett" <sherinbennett@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 8:27:12 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Sherin Bennett and I am writing as a concerned local resident, hiker, bike rider, and lover of the outdoors regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Sherin Bennett

Los Feliz 90027

[sent from my phone]

From: "Sofia Brown de Lopez" <sbrowndel@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/4/2025 8:09:30 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear
California Department of Fish and Wildlife,

My
name is Sofia Brown de Lopez,
and I am writing as a concerned community member
regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)**
related to the **Canyon Hills Project**
and the proposed **Incidental Take Permit (ITP)**
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While
the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental
conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire**
  risk and evacuation limitations

- in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

-

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Sofia Brown de Lopez
Eagle Rock, Los Angeles, CA

From: "solon bixler" <killthepiano@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/13/2025 3:42:27 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

[You don't often get email from killthepiano@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear California Department of Fish and Wildlife,

My name is solon bixler, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,
solon bixler

From: "Steve C." <sc.0922@hotmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 3:32:00 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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I disagree with the approval of this single-family home development in a highly fire prone region that would also do severe, if not irreparable harm to the Crotch's Bumble Bee population.

From: "Steve Gmail" <stevecrouch44@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/20/2025 11:55:46 PM
Subject: Canyon Hills ITP - NAP Scoping Comments

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Hello,

I live within 1 mile of the proposed Canyon Hills development in Tujunga. I was also active between 2001 and 2005 providing information to our Councilperson Wendy Gruel, the Planning and Land Use Management Committee, and the full City Council. Our work succeeded in reducing the development footprint of this project that was approved against a highly vocal public outcry at the time.

Their massive legal campaign at the time inserted many inaccurate and insufficient pieces of information to be included in their final EIR that have proven to be false in the 20 years since they produced their studies, especially as related to wildlife, flora, and traffic impact data. Case in point is the recent discovery of Crotch's Bumblebee living in the project area. There are also documented sitings of mountain lions in the project area whereas they denied finding any evidence of mountain lions at the time of their studies. These new facts now need to be considered and the project denied as there is no mitigation possible.

Whitebird Inc. has sat on this project for 20 years and their approval time expires in 2025. Much has changed in the immediate area that require a reassessment of the project. There are no benefits to the community, the environment, or traffic loads that will further affect this sensitive environment. I urge you to deny any Incidental Take Permit they are seeking to allow this destructive project to move forward. Thank you.

Steve Crouch

+1 818-259-1202

stevecrouch44@gmail.com

This e-mail is intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. Distribution or copying of this e-mail, or the information contained herein, to anyone other than the intended recipient, as well as use for personal or any third party advantage, is prohibited.

From: stforward <stforward@protonmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 9/1/2025 8:51:44 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear California Department of Fish and Wildlife,

On behalf of
Sunland-Tujunga Forward,
a community-based non profit organization committed to equity, sustainability, and protecting the land and water resources of Northeast Los Angeles, I write to comment on the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report
(SEIR) for the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, we thank CDFW for requiring a Supplemental EIR. This is a vital
step toward addressing the outdated and incomplete environmental analysis of a project that was first approved more than 20 years ago. The SEIR provides an important opportunity to reevaluate the full environmental impact of development in one of Los Angeles's
most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

We are, however, concerned that the current scope of the SEIR is limited
solely to evaluating impacts on Bombus crotchii, even though the project footprint spans more than 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat. We urge CDFW to expand the scope of the SEIR to address broader
environmental, cultural, and safety concerns consistent with CEQA's intent and responsive to today's ecological realities. These considerations include:

- **Wildfire risk and evacuation challenges** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (Puma concolor)** in the Verdugo range
- **Disruption of a critical wildlife corridor**, including the I-210 Freeway crossing
- **Cumulative impacts on Threatened and Endangered Species**, including indirect effects from habitat fragmentation
- **Tribal Cultural Resources** that may be impacted by development

-
- **Utilities, energy demand, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability** for the region

As a community in the foothills, we are acutely aware of the risks of wildfire, the importance of biodiversity, and the cultural and ecological value of the Verdugo Mountains. The NOP and scoping period provide a crucial opportunity for CDFW to ensure this review is robust, comprehensive, and reflective of current environmental science and community needs.

We respectfully request that CDFW use its discretion to broaden the scope of the SEIR to fully evaluate the ecological, cultural, and safety consequences of the Canyon Hills Project. Doing so will help ensure the protection of California's biodiversity and safeguard the health and resilience of our communities.

Thank you for your leadership and stewardship.

Sincerely,

Sunland-Tujunga Forward

Sent with Proton Mail secure email.

From: "Susannah Shaw" <susannah.a.shaw@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 4:27:25 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Susannah Shaw, and I am writing as a concerned resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones. However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)

- Presence of CESA-listed California mountain lions (Puma concolor)

- Disruption of critical wildlife corridor (I-210 Freeway crossing)

- Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

- Tribal Cultural Resources

- Utilities, energy, and greenhouse gas emissions

- Climate resilience and long-term ecological sustainability

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Susannah Shaw

From: "Suzanne Unger" <carmenu528@icloud.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 10:05:06 PM
Subject: Subject: Canyon Hills ITP - NOP Scoping Comments

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To: R5ceqa@wildlife.ca.gov

To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna (like the Crotch's bumblebee) is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,

Suzanne Unger

From: "Timmy Conley" <timmyconley85@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 8:44:02 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

[You don't often get email from timmyconley85@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To Whom It May Concern,

The Canyon Hills development is possibly the most ill-advised housing project in the State of California. While building more housing is certainly important, building luxury housing in a high fire risk area at the expense of valuable open space and habitat for our native flora and fauna is not a viable solution to the current housing crisis. Open space in the Los Angeles area is already encroached upon enough and what little that remains outside of our national forests and recreation areas is a precious resource. A statement of overriding considerations on issuing this permit would be an egregious misstep on CDFW's part. Luxury single-family housing is not more important than protecting the habitat of our native species. If the developer cared about addressing the housing crisis they'd focus their efforts on constructing higher density infill housing. They don't care about the environment and they don't care about the housing crisis, they only care about profit.

Thank you,
Tim Conley

From: "Todd Erlandson" <todd@marchstudio.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 2:50:17 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Todd Erlandson, and I am writing as a concerned community member regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)** related to the **Canyon Hills Project** and the proposed **Incidental Take Permit (ITP)** for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on *Bombus crotchii*, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire risk and evacuation limitations** in a Very High Fire Hazard Severity Zone (VHFHSZ)
- **Presence of CESA-listed California mountain lions (*Puma concolor*)**
- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**
- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**
- **Tribal Cultural Resources**
- **Utilities, energy use, and greenhouse gas emissions**
- **Climate resilience and long-term ecological sustainability**

The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. **I respectfully request that CDFW use its discretion** to ensure this environmental review is meaningful,

complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Todd Erlandson
partner, March Studio branded architecture
todd@marchstudio.com
Cell: 310-291-6455

Enviado desde mi iPhone

From: "tracy coleman" <eyerishgrl@hotmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/19/2025 11:28:10 PM
Subject: Canyon Hills Itp

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2017 the area was impacted by a wildfire, the La Tuna Canyon fire. Now, there has been sightings of a State protected Bubblebee and La Tuna Puma. The area is free and should stay as open land. I oppose of any development to this area. I hope CDFW does the right thing and keep the area protected from development. NO TO CANYON HILLS

Tracy Coleman
Sunland, Ca

Sent from my T-Mobile 5G Device
Get Outlook for Android

From: "Trevor Horton" <trevorhorton28@yahoo.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/1/2025 10:06:22 PM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear
California Department of Fish and Wildlife,

My
name is Trevor Horton ,
and I am writing as a concerned Los Angeles resident
regarding the Notice of Preparation (NOP) for the **Draft Supplemental Environmental Impact Report (SEIR)**
related to the **Canyon Hills Project**
and the proposed **Incidental Take Permit (ITP)**
for Crotch's Bumble Bee.

First,
I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess
the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However,
I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on
Bombus
crotchii,
despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While
the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental
conditions and public understanding since the original EIR was drafted (2003). These include:

- **Wildfire**
  risk and evacuation limitations

- in a Very High Fire Hazard Severity Zone (VHFHSZ)

- **Presence of CESA-listed California mountain lions (*Puma concolor*)**

- **Disruption of critical wildlife corridor (I-210 Freeway crossing)**

- **Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development**

- **Tribal Cultural Resources**

- **Utilities, energy use, and greenhouse gas emissions**

- **Climate resilience and long-term ecological sustainability**

-

The
NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized.
I
respectfully request that CDFW use its discretion
to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank
you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Trevor Horton

From: "Victoria Sabonjohn" <victoria@sabonjohn.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/25/2025 11:46:33 PM
Subject: Canyon Hills ITP - NOP Scoping Comments

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Please make saving Crotch's bumblebee and making a true study of the proposed building plan's impact on our environment. Thank you,
Victoria Sabonjohn
Sun Valley resident

From: "Victoria Stover" <victoriamarie7789@gmail.com>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/2/2025 5:46:48 AM
Subject: Canyon Hills ITP – NOP Scoping Comments

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Dear California Department of Fish and Wildlife,

My name is Victoria Stover, and I am writing as a concerned Southern California resident regarding the Notice of Preparation (NOP) for the Draft Supplemental Environmental Impact Report (SEIR) related to the Canyon Hills Project and the proposed Incidental Take Permit (ITP) for Crotch's Bumble Bee.

First, I want to thank CDFW for moving forward with a Supplemental EIR—this is an essential step toward addressing the outdated and incomplete environmental analysis of a project first approved over 20 years ago. This SEIR offers a long-overdue opportunity to reassess the full environmental impact of development in one of Los Angeles's most fire-prone, biodiverse, and ecologically sensitive wildland-urban interface zones.

However, I am deeply concerned that the current scope of the SEIR as outlined in your NOP is limited solely to evaluating impacts on Bombus crotchii, despite the fact that the project footprint spans over 300 acres of critical wildland, including 160 acres of potentially occupied bumblebee habitat.

While the role of a "responsible" versus "lead" agency affords varying levels of control, I urge CDFW to expand the scope of this SEIR to include broader environmental considerations in line with CEQA's intent, especially given the significant changes in environmental conditions and public understanding since the original EIR was drafted (2003). These include:

Wildfire risk and evacuation limitations in a Very High Fire Hazard Severity Zone (VHFHSZ)
Presence of CESA-listed California mountain lions (Puma concolor)
Disruption of critical wildlife corridor (I-210 Freeway crossing)
Cumulative impacts on Threatened and Endangered Species, including indirect impacts from habitat fragmentation and development

Tribal Cultural Resources
Utilities, energy use, and greenhouse gas emissions
Climate resilience and long-term ecological sustainability
The NOP and this scoping period provide the public and agencies with a crucial opportunity to shape the scope of analysis before the SEIR is finalized. I respectfully request that CDFW use its discretion to ensure this environmental review is meaningful, complete, and truly reflective of current ecological realities and regulatory expectations.

Thank you for the opportunity to comment. I hope CDFW will stand firm in its role as steward of

California's precious biodiversity and fully evaluate the ecological consequences of the Canyon Hills Project.

Sincerely,

Victoria Stover
victoriamarie7789@gmail.com
951-532-1695
UCLA Extension Landscape Architecture - Student
Environmental Nature Center - Horticulture Intern
Albert A Webb Associates - Landscape Design Intern
Humboldt State University- Bachelor's of Science Degree - Wildlife Conservation and Management

From: "Wildlife Ask R5" <AskR5@wildlife.ca.gov>
To: "Wildlife R5 CEQA" <R5ceqa@wildlife.ca.gov>
Date: 8/21/2025 3:15:05 PM
Subject: FW: NO to new construction zone around Tuna Canyon Road

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From: Zoe Goulet <zag.goulet@gmail.com>
Sent: Wednesday, August 20, 2025 6:45 PM
To: Wildlife Ask R5 <AskR5@wildlife.ca.gov>
Subject: NO to new construction zone around Tuna Canyon Road

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To whom it may concern,

My name is Zoe Goulet an LA resident and horticulturist. I am adamantly against building new luxury homes or any buildings in the Tuna Canyon area. Each year we lose more and more species, the Crotch Bumblebee is already critically endangered.

Its important to know the bumble bees' life cycle, as construction would quite easily wipe out entire local populations. At the end of the bumblebee season, the founding queen, workers, and male offspring all die off. Only the newly emerged, fertilized queens survive to hibernate through the winter. In either plant material or rodent holes, areas that can easily be disrupted with construction.

To support a healthy population of Crotch Bumblebees suggests that the plant diversity must be particularly good in that area as well. I URGE you to reconsider building and allow nature to recover. The fire risks alone in building in such an area should be reason enough anyways.

I know to developers it seems silly to redirect course of action for a bee but its so much more. The butterfly effect of building on that land would be detrimental to the wildlife.

Thank you for your consideration,

Zoe Goulet

Appendix C

Crotch's Bumble Bee Report, Glenn Lukos Associates, August 5, 2024, updated April 10, 2025

Exhibit 1

GLENN LUKOS ASSOCIATES

Regulatory Services

August 5, 2024 [Updated April 10, 2025]

Ms. Kelly Schmoker
Senior Environmental Scientist
California Department of Fish and Wildlife
3030 Old Ranch Parkway, Suite 400
Seal Beach, CA 90740

SUBJECT: Crotch's Bumble Bee Surveys of the Original, Approximately 900-Acre Canyon Hills Project Site Located in the Verdugo Hills, City of Los Angeles, California

Dear Ms. Schmoker:

This letter and its attachments constitute an updated report documenting the findings regarding the presence of Crotch's bumble bee (*Bombus crotchii*), ("CBB") a California Endangered Species Act ("CESA") State Candidate within the original, approximately 900-acre project site ("Original Project Site") for the Canyon Hills Project ("Project") [**Exhibits 1** and **2**]. This updated report has been prepared to incorporate the results of site-wide vegetation mapping consistent with the Membership Rules for Manual of California Vegetation alliances and also minor changes resulting from small adjustments to project boundaries and impact limits identified during the updates to the vegetation mapping. There are no changes to the CBB survey results. Surveys were conducted by biologists from Glenn Lukos Associates ("GLA") during periods of high detectability in spring of 2024. This report supports the request of the project applicant for an Individual Take Permit from the California Department of Fish and Wildlife ("CDFW") with respect to the Project's impact on the CBB.

This report includes a description of the recently mapped and revised vegetation alliances within the approximately 300-acre development site ("Development Site") approved by the City of Los Angeles (the "City") for the development of the Project and the recently mapped vegetation alliances within the Original Project Site, including the approximately 600-acre portion thereof that has been permanently preserved as open space ("Open Space Mitigation Area") and includes areas of suitable habitat for the CBB and mitigates the Project's impact on the CBB within the Development Site. This report describes the Project's impact to the CBB and associated habitat and how the prior preservation of the Open Space Mitigation Area compensates for that impact.

I. PERMITTEE/APPLICANT

Applicant: California Whitebird, Inc.

Applicant's Agent: Glenn Lukos Associates, Inc.
1940 E. Deere Avenue, Suite 250
Santa Ana, California 92705
Contact: Tony Bomkamp or Lexi Kessans
Telephone: (949) 837-0404
tbomkamp@wetlandpermitting.com

II. CROTCH'S BUMBLE BEE SURVEYS

Methodology

Surveys were conducted by GLA biologists experienced in conducting focused surveys for the CBB in areas of suitable habitat within the Open Space Mitigation Area as depicted on **Exhibit 3**. They focused on the Open Space Mitigation Area in part because CBB was recently detected at two locations within the Development Site as shown on **Exhibit 3**. Site Photographs of the Open Space Mitigation Area are included as **Exhibit 4**.

Surveys by GLA followed a protocol developed by GLA which largely encompasses the CBB flight season (March to September) when the queen, daughters, males and new queens are generally active. Surveys were spaced out throughout the flight season to take advantage of different blooming periods and floral resources. The survey protocol recommends that individual biologists conduct three focused surveys during the flight season, beginning within areas determined to contain the highest quality floral resources per every 50 acres of potential suitable habitat. Based on previous mapping, most of the Open Space Mitigation Area, as well as the Development Site, were determined to support potentially suitable habitat. Due to the substantial size of the Open Space Mitigation Area and difficult access for some portions of it, surveys were focused on suitable habitat areas with the best access to allow for more areas to be surveyed. Three biologists conducted three focused surveys each.

During each focused survey within the Open Space Mitigation Area, two sampling approaches were implemented. During the first phase, the surveyor conducted one hour of visual survey effort within approximately three acres identified as supporting the highest quality habitat as determined by the surveyor. If CBB were not detected during the first hour of searching, a second hour of survey effort was conducted. During the second hour, the surveyor could either choose to resurvey the same flowering area (if any *Bombus* species were detected prior) or the surveyor could choose to conduct a second hour of searching within another high quality three-

acre flowering area on site. If CBB were not detected during the second hour of the survey effort, the second survey phase was implemented, in which the surveyor surveyed the best additional flowering areas throughout the site, as deemed appropriate. The surveyor scanned suitable flowering areas for bumble bee activity and focused on those areas. Minimal time was spent in lesser quality habitat.

The focused surveys were conducted by GLA biologists Jeff Ahrens, Jason Fitzgibbon, David Smith, and Stephanie Cashin on May 13, June 7, and June 26, 2024. Pursuant to the survey guidelines, the surveys were conducted during daytime hours when floral resources were in bloom and it was sufficiently warm for bumblebee activity. Weather conditions during the surveys were conducive to a high level of bee activity. Table 1 summarizes the Crotch's bumble bee survey visits. The results of the CBB surveys are documented below.

Table 1. Summary of Crotch's Bumble Bee Survey Visits

Survey Date	Biologist	Start/End Time	Start/End Temperature (degree F)	Start/End Wind Speed (mph)
05/13/24	JA, SC, JF	0730 - 1800	59 - 70	3-6
06/07/24	JA, JF	0930 - 1500	51- 77	2-7
06/26/24	JF, SC, DS	0900 -1500	58 - 79	2-4

SC = Stephanie Cashin, JF = Jason Fitzgibbon, JA = Jeff Ahrens,
DS = David Smith

Results

As noted, CBB were previously detected in 2023 within the Development Site. Therefore, GLA's surveys focused on the Open Space Mitigation Area as depicted on **Exhibit 3**. Based on previous vegetation mapping for the Original Project Site conducted for the Biological Technical Assessment Report for the Project previously prepared by GLA, the Original Project Site contains areas of coastal sage scrub, deerweed scrub, chaparral with black sage as a common component, with additional understory species that comprise suitable nectar sources and therefore considered suitable habitat for the CBB, all as described below.

Vegetation Alliances and Floral Resources

Exhibit 1 is a vegetation map, updated in January 2025, that incorporates the nomenclature based on the associated Membership Rules from the Manual of California Vegetation 3 (MCV) for the vegetation alliances on the site. Table 1 below has been expanded from the ITP Application to include the original vegetation types mapped for the DEIR and corresponding MCV alliances. Table 1 below reflects the updated mapping conducted in early 2025. As previously noted, during

surveys for the Crotch's bumble bee in 2024 as reported herein, GLA's biologists recorded floral resources favored by the CBB. These are addressed in various responses below.

Specifically, and as discussed in the updated vegetation descriptions in more detail below, the approximately 600 acres of permanent open space within the Open Space Mitigation Area includes approximately 571.58 acres of vegetation alliances that contain native habitats that include floral resources such as black sage (*Salvia mellifera*), white sage (*Salvia apiana*), California buckwheat (*Eriogonum fasciculatum),* deerweed (*Acmispon glaber*). Each of these species is common throughout various vegetation alliances with deerweed common across the site due to a fire in 2017 and continues to persist in many alliances, with 91.93 acres mapped in early 2025. Exhibit 4, Photographs 1 and 2, depict areas of Deerweed Scrub and CSS showing between 80- and 90-percent cover and Photographs 3 and 4 show Ceanothus chaparral with similar cover, approaching 90-percent cover. In addition to the dominant common shrubs, the GLA Biologists conducting the CBB surveys in 2024 document and mapped a broad range of floral resources use by CBB including (but not limited to) Indian milkweed (*Asclepias eriocarpa*), narrow-leaved milkweed (*Asclepias fascicularis*), fireweed (*Amsinckia menziesii*), five species of *Lotus* or *Acmispon* and six species of *Lupinus*, hairy vetch (*Vicia villosa*), yerba santa (*Eriodictyon crassifolium*), four species of *Phacelia*, three species of *Salvia*, two species of *Trichostemma*, and a variety of annuals from the Scrophulariaceae, Liliaceae and others. In short, both the development area and the open space contain suitable habitat for the CBB. This is further discussed under paragraph ***8. Cal. Code Regs., tit. 14, § 783.2, subd. (a)(8)*** below.

The descriptions that follow are in accordance with the MCV. Table 1 below includes all the vegetation alliances on the site. Following Table 1 are descriptions of the vegetation alliances on the Original Project Site, all of which (excluding Disturbed Developed) have potential habitat value for the CBB.

Table 1. Summary of Vegetation/Land Use Types for the Project Site

VEGETATION ALLIANCES/LAND USE TYPE	RANK	CODE	ACREAGE
FOREST AND WOODLAND ALLIANCES			
Quercus agrifolia Woodland Alliance	S4G4	71.060.00	39.23
Platanus racemosa – Quercus agrifolia Woodland Alliance	S3G3	61.310.00	11.50
RIPARIAN ALLIANCES			
Salix gooddingii Woodland Alliance	S3G4	61.216.00	1.19
Baccharis salicifolia Shrubland Alliance	S4G5	63.510.00	0.07
CHAPARRAL ALLIANCES			
Ceanothus crassifolius Shrubland Alliance	S4G4	37.208.00	30.03
Dendromecon rigida Shrubland Alliance	S5G5	37.070.00	17.87

VEGETATION ALLIANCES/LAND USE TYPE	RANK	CODE	ACREAGE
Heteromeles arbutifolia Shrubland Alliance	S4G5	37.912.00	5.75
Adenostoma fasciculatum Shrubland Alliance	S5G5	37.101.00	3.61
Quercus berberidifolia Shrubland Alliance	S4G4	37.407.00	1.18
SCRUB ALLIANCES			
Malosma laurina Shrubland Alliance	S4G4	45.455.00	475.52
Acmispon glaber Shrubland Alliance	S5G5	37.070.00	116.11
Artemisia californica Shrubland Alliance	S5G5	32.015.00	97.64
Eriogonum fasciculatum Shrubland Alliance	S5G5	32.040.00	73.23
Eriodictyon crassifolium Shrubland Alliance	S5G5	37.070.00	4.24
Salvia mellifera Shrubland Alliance	S4G4	32.020.00	2.51
GRASSLAND ALLIANCES			
Centaurea melitensis Herbaceous Semi-Natural Alliance	NA	42.013.00	5.82
Avena barbata – Bromus rubens Herbaceous Semi-Natural Alliance	NA	42.027.00	3.83
DISTURBED/DEVELOPED AREAS			
Disturbed/Developed	NA	NA	11.62
TOTAL			**900.95**

FOREST AND WOODLAND ALLIANCES

Quercus agrifolia Woodland Alliance (Coast Live Oak Woodland) – S4G4

The *Quercus agrifolia* Woodland Alliance is dominated by coast live oak (*Quercus agrifolia*), which comprises a minimum of 50 percent relative cover in the tree canopy, in accordance with the membership rules of the MCV. Associated understory shrubs in order of descending dominance include blue elderberry (*Sambucus mexicana),* toyon (*Heteromeles arbutifolia*), Spanish broom (*Spartea juncea*), California sagebrush (*Artemisia californica*), laurel sumac (*Malosma laurina*), and poison oak (*Toxicodendron diversilobum*). In many areas, the interstitial spaces between trees and shrubs are occupied by herbaceous species such as slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), smilo grass (*Stipa miliacea*), summer mustard (*Hirschfeldia incana*), California aster (*Corethrogyne filaginifolia*), longstem buckwheat (*Eriogonum elongatum),* and golden yarrow (*Eriophyllum confertiflorum*).

The Original Project Site supports approximately 39.23 acres of the *Quercus agrifolia* Woodland Alliance. In general, the alliance occurs throughout the site and is primarily associated with canyon bottoms and north-facing slopes.

***Platanus racemosa – Quercus agrifolia* Woodland Alliance (California Sycamore – Coast Live Oak Woodland) – S3G3**

The *Platanus racemosa – Quercus agrifolia* Woodland Alliance is dominated by coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*), which comprise a minimum of 30 to 50 percent relative cover in the tree canopy, in accordance with the membership rules of the MCV. Co-dominant trees in order of descending dominance include Goodding's willow (*Salix gooddingii*) and arroyo willow (*Salix lasiolepis*). Associated understory shrubs in order of descending dominance include blue elderberry (*Sambucus mexicana*), California sagebrush (*Artemisia californica*), and poison oak (*Toxicodendron diversilobum*).

The Original Project Site supports approximately 11.50 acres of the *Platanus racemosa – Quercus agrifolia* Woodland Alliance. In general, the alliance occurs throughout the site and is primarily associated with drainages with La Tuna Canyon Wash supporting a substantial component.

RIPARIAN ALLIANCES

***Salix gooddingii* Woodland Alliance (Goodding's Willow Woodland) – S3G4**

The *Salix gooddingii* Woodland Alliance is dominated by Goodding's willow (*Salix gooddingii*), which comprises a minimum of 50 percent relative cover in the tree canopy, in accordance with the membership rules of the MCV. Co-dominant trees in order of descending dominance include arroyo willow (*Salix lasiolepis*) and Mexican fan palm (*Washingtonia robusta*). Associated understory shrubs in order of descending dominance include mulefat (*Baccharis salicifolia*), blue elderberry (*Sambucus mexicana*), and poison oak (*Toxicodendron diversilobum*). In many areas, the interstitial spaces between trees and shrubs are occupied by herbaceous species such as stinging nettle (*Urtica dioica*), smilo grass (*Stipa miliacea*), sticky snakeroot (*Ageratina adenophora*), broadleaf cattail (*Typha latifolia*), and San Diego sedge (*Carex spissa*).

The Original Project Site supports approximately 1.19 acres of the *Salix gooddingii* Woodland Alliance. The alliance occurs in the southern portion of the site and is primarily associated with drainages.

***Baccharis salicifolia* Shrubland Alliance (Mulefat Thickets) – S4G5**

The Baccharis salicifolia Shrubland Alliance is dominated by mulefat (*Baccharis salicifolia*), which comprises a minimum of 50 percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include, blue elderberry (*Sambucus mexicana*), and poison oak (*Toxicodendron diversilobum*). In many areas, the interstitial spaces between trees and shrubs are occupied by herbaceous species

such as stinging nettle (*Urtica dioica*), smilo grass (*Stipa miliacea*), sticky snakeroot (*Ageratina adenophora*), and California mugwort (*Artemisia douglasiana*).

The Original Project Site supports approximately 0.07 acre of the *Baccharis salicifolia* Shrubland Alliance. The alliance occurs in one location at the western end of the site in a drainage.

CHAPARRAL ALLIANCES

***Ceanothus crassifolius* Shrubland Alliance (Hoary Leaf Ceanothus Chaparral) – S4G4**

The *Ceanothus crassifolius* Shrubland Alliance is dominated by hoary leaf ceanothus (*Ceanothus crassifolius*), which comprises a minimum of 30 to 30 percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include Chamise (*Adenostoma fasciculatum*), laurel sumac (*Malosma laurina*), black sage (*Salvia mellifera*), deerweed (*Acmispon glaber*), bush poppy (*Dendromecon rigida*), toyon (*Heteromeles arbutifolia*), California buckwheat (*Eriogonum fasciculatum*), and mountain mahogany (*Cercocarpus betuloides*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as tocalote (*Centaurea melitensis),* summer mustard (*Hirschfeldia incana*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), golden yarrow (*Eriophyllum confertiflorum*), and purple needlegrass (*Stipa pulchra*).

The Original Project Site supports approximately 30.03 acres of the *Ceanothus crassifolius* Shrubland Alliance. In general, the alliance occurs throughout the site and is primarily associated with north and west-facing slopes.

***Dendromecon rigida* Shrubland Alliance (Bush Poppy Scrub) – S5G5**

The *Dendromecon rigida* Shrubland Alliance is dominated by bush poppy (*Dendromecon rigida*), which comprises a minimum of fifty percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include chamise (*Adenostoma fasciculatum*), deerweed (*Acmispon glaber*), black sage (*Salvia mellifera*), California buckwheat (*Eriogonum fasciculatum*), hoary leaf ceanothus (*Ceanothus crassifolius*), chaparral yucca (*Hesperoyucca whipplei*), and holly leaf redberry (*Rhamnus ilicifolia*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as California aster (*Corethrogyne filaginifolia*), tocalote (*Centaurea melitensis),* summer mustard (*Hirschfeldia incana*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), golden yarrow (*Eriophyllum confertiflorum*), and purple needlegrass (*Stipa pulchra*).

The Original Project Site supports approximately 17.87 acres of the *Dendromecon rigida* Shrubland Alliance. In general, the alliance occurs in the northern portion of the site and is primarily associated with north and east-facing slopes.

***Heteromeles arbutifolia* Shrubland Alliance (Toyon Chaparral) – S4G5**

The *Heteromeles arbutifolia* shrubland Alliance is dominated by Toyon (*Heteromeles arbutifolia*), which comprises a minimum of fifty percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include holly leaf cherry (*Prunus ilicifolia*), laurel sumac (*Malosma laurina*), Spanish broom (*Spartea juncea*), hoary leaf ceanothus (*Ceanothus crassifolius*), and blue elderberry (*Sambucus mexicana*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as California aster (*Corethrogyne filaginifolia*), tocalote (*Centaurea melitensis),* summer mustard (*Hirschfeldia incana*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), golden yarrow (*Eriophyllum confertiflorum*), and purple needlegrass (*Stipa pulchra*).

The Original Project Site supports approximately 5.75 acres of the *Heteromeles arbutifolia* Shrubland Alliance. The alliance occurs in two locations on the site and is primarily associated with north-facing slopes.

***Adenostoma fasciculatum* Shrubland Alliance (Chamise Chaparral) – S5G5**

The *Adenostoma fasciculatum* Shrubland Alliance is dominated by chamise (*Adenostoma fasciculatum*), which comprises a minimum of fifty percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include bush poppy (*Dendromecon rigida*), deerweed (*Acmispon glaber*), black sage (*Salvia mellifera*), California buckwheat (*Eriogonum fasciculatum*), hoary leaf ceanothus (*Ceanothus crassifolius*), sawtooth golden bush (*Hazardia squarrosa*), chaparral yucca (*Hesperoyucca whipplei*), and holly leaf redberry (*Rhamnus ilicifolia*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as California aster (*Corethrogyne filaginifolia*), tocalote (*Centaurea melitensis),* summer mustard (*Hirschfeldia incana*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), golden yarrow (*Eriophyllum confertiflorum*), and purple needlegrass (*Stipa pulchra*).

The Original Project Site supports approximately 3.61 acres of the *Adenostoma fasciculatum* Shrubland Alliance. In general, the alliance occurs in the southern portion of the site and is primarily associated with south-facing slopes.

Quercus berberidifolia Shrubland Alliance (Scrub Oak Chaparral) – S4G4

The *Quercus berberidifolia* Shrubland Alliance is dominated by scrub oak (*Quercus berberidifolia*), which comprises a minimum of 30 to 50 percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include toyon (*Heteromeles arbutifolia*), sugar bush (*Rhus ovata*), chamise (*Adenostoma fasciculatum*), chaparral yucca (*Hesperoyucca whipplei*), black sage (*Salvia mellifera*), and hoary leaf ceanothus (*Ceanothus crassifolius*). Emergent trees are sometimes present among the shrub canopy, including coast live oak (*Quercus agrifolia*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as peak rushrose (*Crocanthemum scoparium*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), golden yarrow (*Eriophyllum confertiflorum*), and purple needlegrass (*Stipa pulchra*).

The Original Project Site supports approximately 1.18 acres of the *Quercus berberidifolia* Shrubland Alliance. In general, the alliance occurs in the eastern portion of the site and is primarily associated with north and east-facing slopes.

SCRUB ALLIANCES

Malosma laurina Shrubland Alliance (Laurel Sumac Scrub) – S4G4

The *Malosma laurina* Shrubland Alliance is dominated by laurel sumac (*Malosma laurina*), which comprises a minimum of 30 to 50 percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), black sage (*Salvia mellifera*), chaparral yucca (*Hesperoyucca whipplei*), California brickellbush (*Brickellia californica*), Spanish broom (*Spartea juncea*), holly leaf cherry (*Prunus ilicifolia*), blue elderberry (*Sambucus mexicana*), and deerweed (*Acmispon glaber*). In many areas, the interstitial spaces are occupied by herbaceous species such as California aster (*Corethrogyne filaginifolia*), tocalote (*Centaurea melitensis),* summer mustard (*Hirschfeldia incana*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), golden yarrow (*Eriophyllum confertiflorum*), peak rushrose (*Crocanthemum scoparium*) and purple needlegrass (*Stipa pulchra*).

The Original Project Site supports approximately 475.52 acres of the *Malosma laurina* Shrubland Alliance. In general, the alliance occurs throughout the site and is primarily associated with south and west-facing slopes.

Acmispon glaber Shrubland Alliance (Deerweed Scrub) – S5G5

The *Acmispon glaber* Shrubland Alliance is dominated by deerweed (*Acmispon glaber*), which comprises a minimum of fifty percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), chamise (*Adenostoma fasciculatum*), sawtooth golden bush (*Hazardia squarrosa*), California brickellbush (*Brickellia californica*), California sagebrush (*Artemisia californica*), holly leaf redberry (*Rhamnus ilicifolia*), laurel sumac (*Malosma laurina*), and hoary leaf ceanothus (*Ceanothus crassifolius*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as golden yarrow (*Eriophyllum confertiflorum*), California aster (*Corethrogyne filaginifolia*), tocalote (*Centaurea melitensis),* summer mustard (*Hirschfeldia incana*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), peak rushrose (*Crocanthemum scoparium*) and purple needlegrass (*Stipa pulchra*).

The Original Project Site supports approximately 116.11 acres of the *Acmispon glaber* Shrubland Alliance. In general, the alliance occurs throughout the site and is primarily associated with areas that have previously burned.

Artemisia Californica Shrubland Alliance (California Sagebrush Scrub) – S5G5

The *Artemisia californica* Shrubland Alliance is dominated by California sagebrush (*Artemisia californica*), which comprises a minimum of 30 to 60 percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include California buckwheat (*Eriogonum fasciculatum*), Spanish broom (*Spartea juncea*), deerweed (*Acmispon glaber*), laurel sumac (*Malosma laurina*), scrub oak (*Quercus berberidifolia*), toyon (*Heteromeles arbutifolia*), and blue elderberry (*Sambucus mexicana*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), smilo grass (*Stipa miliacea*), summer mustard (*Hirschfeldia incana*), California aster (*Corethrogyne filaginifolia*), longstem buckwheat (*Eriogonum elongatum),* and golden yarrow (*Eriophyllum confertiflorum*).

The Original Project Site supports approximately 97.64 acres of the *Artemisia californica* Shrubland Alliance. In general, the alliance occurs throughout the site and is primarily associated with north and west-facing slopes.

Eriogonum fasciculatum Shrubland Alliance (California Buckwheat Scrub) – S5G5

The *Eriogonum fasciculatum* Shrubland Alliance is dominated by California buckwheat (*Eriogonum fasciculatum*), which comprises a minimum of 50 percent relative cover in the shrub canopy. Co-dominant shrubs in order of descending dominance include deerweed (*Acmispon*

glaber), black sage (*Salvia mellifera*), chamise (*Adenostoma fasciculatum*), sawtooth golden bush (*Hazardia squarrosa*), California sagebrush (*Artemisia californica*), holly leaf redberry (*Rhamnus ilicifolia*), laurel sumac (*Malosma laurina*), hoary leaf ceanothus (*Ceanothus crassifolius*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as golden yarrow (*Eriophyllum confertiflorum*), California aster (*Corethrogyne filaginifolia*), tocalote (*Centaurea melitensis),* summer mustard (*Hirschfeldia incana*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), peak rushrose (*Crocanthemum scoparium*) and purple needlegrass (*Stipa pulchra*).

The Original Project Site supports approximately 73.23 acres of the *Eriogonum fasciculatum* Shrubland Alliance. In general, the alliance occurs throughout the site and is primarily associated with south-facing slopes.

***Eriodictyon crassifolium* Shrubland Alliance (Yerba Santa Scrub) – S5G5**

The *Eriodictyon crassifolium* Shrubland Alliance is dominated by thickleaf yerba santa (*Eriodictyon crassifolium*), which comprises a minimum of 50 percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include deerweed (*Acmispon glaber*), black sage (*Salvia mellifera*), California buckwheat (*Eriogonum fasciculatum*), hoary leaf ceanothus (*Ceanothus crassifolius*), sawtooth goldenbush (*Hazardia squarrosa*), bush poppy (*Dendromecon rigida*), chamise (*Adenostoma fasciculatum*), and chaparral yucca (*Hesperoyucca whipplei*). In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as tocalote (*Centaurea melitensis*), slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), smilo grass (*Stipa miliacea*), summer mustard (*Hirschfeldia incana*), California aster (*Corethrogyne filaginifolia*), longstem buckwheat (*Eriogonum elongatum),* and golden yarrow (*Eriophyllum confertiflorum*).

The Original Project Site supports approximately 4.24 acres of the *Eriodictyon crassifolium* Shrubland Alliance. The alliance occurs in one location along the northern edge of the site and is associated with a previously burned area.

***Salvia mellifera* Shrubland Alliance (Black Sage Scrub) – S4G4**

The *Salvia mellifera* Shrubland Alliance is dominated by black sage (*Salvia mellifera*), which comprises a minimum of 30 to 50 percent relative cover in the shrub canopy, in accordance with the membership rules of the MCV. Co-dominant shrubs in order of descending dominance include deerweed (*Acmispon glaber*), black sage (*Salvia mellifera*), chamise (*Adenostoma fasciculatum*), sawtooth golden bush (*Hazardia squarrosa*), hoary leaf ceanothus (*Ceanothus crassifolius*), bush poppy (*Dendromecon rigida*), holly leaf redberry (*Rhamnus ilicifolia*), and blue elderberry (*Sambucus mexicana*). In many areas, the interstitial spaces between shrubs are

occupied by herbaceous species such as slender sunflower (*Helianthus gracilentus*), crested needlegrass (*Acnatherum coronatum*), In many areas, the interstitial spaces between shrubs are occupied by herbaceous species such as slender wild oat (*Avena barbata*), red brome (*Bromus rubens*), smilo grass (*Stipa miliacea*), summer mustard (*Hirschfeldia incana*), California aster (*Corethrogyne filaginifolia*), longstem buckwheat (*Eriogonum elongatum),* and golden yarrow (*Eriophyllum confertiflorum*).

The Original Project Site supports approximately 2.51 acres of the *Salvia mellifera* Shrubland Alliance. In general, the alliance occurs in the western portion of the site and is primarily associated with west-facing slopes.

GRASSLAND ALLIANCES

***Centaurea melitensis* Herbaceous Semi-Natural Alliance (Star-Thistle Fields) -- SNAGNA**

The *Centaurea melitensis* Herbaceous Semi-Natural Alliance is dominated by tocalote (*Centaurea melitensis*), which comprises a minimum of 50 to 80 percent relative cover in the herbaceous layer, in accordance with the membership rules of the MCV. Co-dominant herbaceous species in order of descending dominance include summer mustard (*Hirschfeldia incana*), red brome (*Bromus rubens*), and golden yarrow (*Eriophyllum confertiflorum*). Emergent shrubs are sometimes present among the herbaceous layer, including deerweed (*Acmispon glaber*) and California buckwheat (*Eriogonum fasciculatum*).

The Original Project Site supports approximately 5.82 acres of the *Centaurea melitensis* Herbaceous Semi-Natural Alliance. The alliance occurs throughout the site and is primarily associated with previously burned areas.

***Avena barbata – Bromus rubens* Herbaceous Semi-Natural Alliance (Wild Oats and Annual Brome Grasslands) -- SNAGNA**

The *Avena barbata – Bromus rubens* Herbaceous Semi-Natural Alliance is dominated by slender wild oat (*Avena barbata*) and red brome (*Bromus rubens*), which comprise a minimum of 30 to 80 percent relative cover in the herbaceous layer, in accordance with the membership rules of the MCV. Co-dominant herbaceous species in order of descending dominance include smilo grass (*Stipa miliacea*), and tocalote (*Centaurea melitensis*). Emergent shrubs are sometimes present among the herbaceous layer, including white sage (*Salvia apiana*), California buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), and tree tobacco (*Nicotiana glauca*).

The Original Project Site supports approximately 3.83 acres of the *Avena barbata – Bromus rubens* Herbaceous Semi-Natural Alliance. In general, the alliance occurs in the southern half of the site and is primarily associated with previously burned areas.

DISTURBED/DEVELOPED AREAS

Disturbed/Developed Areas – SNAGNA

Disturbed/Developed Areas are areas with current or historical signs of land use that do not contain continuous vegetation. These places include roads, staging areas, trails, rubble piles, and areas with mowed or cleared vegetation.

The Original Project Site contains approximately 11.62 acres of Disturbed/Developed Areas. These areas are present throughout the site.

III. PROJECT DESCRIPTION

The Original Project Site is located in the City near the northeast corner of the Verdugo Hills. The Project is a hillside residential development that was substantially downsized relative to the project that was initially proposed and evaluated in the Draft Environmental Impact Report ("Draft EIR") for the Project. The current Development Site is limited to the north side of Interstate 210 and south of a prominent ridgeline [**Exhibit 1** – Regional Map and **Exhibit 2** – Vicinity Map]. The original project evaluated in the Draft EIR included 280 single-family homes on both sides of Interstate 210 with 194 impacted acres. In comparison, the approved, current Project includes 221 single-family homes on the north side of Interstate 210 with 164.63 impacted acres [**Exhibit 3** – Site Development Plan].

The Development Site is generally bounded by Interstate 210 on the south, existing development on the east, a prominent ridgeline on the north and a portion of the Open Space Mitigation Arean the west. Specific work areas and mitigation measures are described in the Draft EIR dated October 2003 and prepared by Christopher A. Joseph & Associates Environmental Planning and Research ("CAJA") for the City of Los Angeles, as well as the Final Environmental Impact Report ("Final EIR") for the Project dated September 7, 2004, also prepared by CAJA for the City.

Habitat Dedication

The Los Angeles City Council approved a Development Agreement for the Project on July 5, 2006 pursuant to Ordinance No. 177701, which the City and California Whitebird, Inc., the project applicant, subsequently executed and caused to be recorded on October 11, 2006 as Instrument No.

06-2263468 in the Official Records of Los Angeles County, California ("Official Records"). Pursuant to Section 3.1.3.1 of the Development Agreement, the applicant voluntarily agreed to permanently preserve the approximately 600-acre Open Space Mitigation Area as open space, including the entirety of the portion of the Original Project Site located south of Interstate 210 and the western portion of the Original Project Site located north of Interstate 210, and to first offer the Open Space Mitigation Area to the Santa Monica Mountains Conservancy ("SMMC").

Thereafter, Whitebird Real Estate Holdings LLC ("WREH"), which owned the Open Space Mitigation Area, and the Mountains Recreation and Conservation Authority, an affiliate of SMMC, entered into a Grant of Conservation Easement ("Conservation Easement") that was recorded on January 3, 2011 as Instrument No. 2011-0000626 in the Official Records. Pursuant to the Conservation Easement, the Public Open Space must be preserved as open space and to assure that it will be used exclusively for public outdoor recreational and related educational purposes. Pursuant to Section 4(h) of the Conservation Easement, the applicant reserved the right to perform biological mitigation within the Open Space Mitigation Area for the purpose of mitigating biological impacts associated with the development of the Project, provided that the aggregate size of such mitigation areas cannot exceed 25 acres.

Following the recordation of the Conservation Easement, WREH transferred to Desert and Mountain Conservation Authority ("DMCA"), another affiliate of SMMC, fee title to the Open Space Mitigation Area pursuant to two Grant Deeds recorded on December 29, 2011 as Instrument No. 2011-1771199 in the Official Records and August 1, 2013 as Instrument No. 2013-1132822 in the Official Records. DMCA has now held title to the Open Space Mitigation Area for more than a decade.

IV. PROJECT IMPACT ON THE CBB

As depicted on **Exhibit 3**, occurrences of the CBB were identified on the Development Site, including observations on March 27, 2023, and June 16, 2023, as recorded on CNDDB Forms. The report for March 27, 2023, noted one adult "flying loudly in circles overhead then landing on Salvia mellifera to forage. It visited two plants before flying off." The report for June 16, 2023 stated that 10 individuals were detected "foraging on Acmispon glaber, Salvia mellifera, and Eriogonum fasciculatum. Nesting – witnessed male drone fly out of small hole 1-2 in wide." GLA detected one additional location shown on **Exhibit 3**, which is located at the northwest corner of the Development Site and essentially straddles the development/open space boundary.

Grading for the Project will impact up to approximately 164.63 acres of suitable habitat for the CBB within the Development Site, as summarized in Table 2 below. Fuel modification will impact an additional approximately 63.89 acres. This habitat impact on a State Candidate species, which receives the same protection as species listed under the CESA, would be

considered significant without mitigation. However, the Project's impact on the CBB would not have a new or substantially increased significant biological impact because the Final EIR identified the Project's potentially significant impact on any special-status wildlife species that could occur on the Project Site and the permanent preservation of approximately 600 acres of the approximately 900-acre Original Project Site as open space mitigated the Project's impact on those special-status wildlife species, including the CBB.

The Project could have related adverse impacts to the CBB related to increased habitat fragmentation and edge effects. These potential impacts could include: decreased food supply through changes in composition of floral nectar resources (starvation); increased interaction with non-native honey bees (competition for food and space, introduction of disease, introduction of parasites). Individuals displaced due to habitat loss and degradation may be unable to survive in adjacent areas if these areas are at carrying capacity or are unsuitable for colonization. Again, however, and as more specifically discussed below, the prior preservation of the Open Space Mitigation Area as open space has already mitigated those potential related impacts.

Table 2. Summary of Vegetation/Land Use Impacts for the Development Site

VEGETATION ALLIANCES/LAND USE TYPE	ONSITE	OFFSITE	TOTAL
GRADING IMPACTS			
Habitat Potentially Suitable for CBB			
Quercus agrifolia Woodland Alliance	2.13	0.0	2.13
Platanus racemosa – Quercus agrifolia Woodland Alliance	0.96	0.02	0.98
Ceanothus crassifolius Shrubland Alliance	0.70	0.0	0.70
Dendromecon rigida Shrubland Alliance	12.68	0.0	12.68
Heteromeles arbutifolia Shrubland Alliance	0.84	0.0	0.84
Adenostoma fasciculatum Shrubland Alliance	0.14	0.14	0.28
Quercus berberidifolia Shrubland Alliance	0.27	0.0	0.27
Malosma laurina Shrubland Alliance	111.76	12.04	123.80
Acmispon glaber Shrubland Alliance	8.66	0.29	8.95
Artemisia californica Shrubland Alliance	0.14	0.0	0.14
Eriogonum fasciculatum Shrubland Alliance	9.10	0.93	10.03
Eriodictyon crassifolium Shrubland Alliance	3.79	0.04	3.83
Subtotal (Habitat Potentially Suitable for CBB)	151.17	13.46	164.63
Land Cover Not Suitable for CBB			
Disturbed/Developed	1.94	0.15	2.09
TOTAL	**153.11**	**13.61**	**166.72**
FUEL MODIFICATION IMPACTS			
Habitat Potentially Suitable for CBB			
Acmispon glaber Shrubland Alliance	4.72	0.0	4.72
Artemisia californica Shrubland Alliance	0.09	0.0	0.09

VEGETATION ALLIANCES/LAND USE TYPE	ONSITE	OFFSITE	TOTAL
Ceanothus crassifolius Shrubland Alliance	0.97	0.0	0.97
Dendromecon rigida Shrubland Alliance	3.72	0.0	3.72
Eriogonum fasciculatum Shrubland Alliance	6.32	0.0	6.32
Heteromeles arbutifolia Shrubland Alliance	1.97	0.0	1.97
Malosma laurina Shrubland Alliance	43.71	0.0	43.71
Platanus racemosa – Quercus agrifolia	2.34	0.0	2.34
Quercus agrifolia Woodland Alliance	0.05	0.0	0.05
Subtotal (Habitat Potentially Suitable for CBB)	63.89	0.0	63.89
Land Cover Not Suitable for CBB			
Disturbed/Developed	0.77	0.0	0.77
TOTAL	**64.66**	**0.0**	**64.66**
TOTAL COMBINED GRADING AND FMZ			**231.38**

V. PRIOR MITIGATION

As previously discussed, the Project's impact on the CBB would not have a new or substantially increased significant biological impact that was not previously mitigated by the permanent preservation of the Open Space Mitigation Area as open space, which mitigated the Project's impact on any special-status wildlife species that could occur on the Development Site, including the CBB. As discussed further below, the Open Space Mitigation Area includes the conservation of sufficient open space with substantial amounts of suitable habitat to mitigate the Project's impact on the CBB, as confirmed GLA's surveys this year. In addition, the Individual Take Permit (ITP) requested from CDFW would include reasonable and necessary conditions to be implemented during construction to reduce potential take of the CBB through biological monitoring.

Habitat Conservation

As shown in Table 3 below, the approximately 600 acres of permanently preserved open space within the Open Space Mitigation Area includes approximately 571.58 acres that consist of the vegetation alliances noted above that contain suitable floral resources for the CBB. The surveys conducted in 2024 by GLA biologists confirmed the CBB at ten locations within the Open Space Mitigation Area, as depicted on Exhibit 3, with an additional observations immediately offsite. In addition to CBB, yellow-faced (*Bombus vosnesenskii*), California bumble bee (*Bombus fervidus californicus*), and blacked-tailed (*Bombus melanopygus*) bumblebees were also observed.

The location of other species of bumblebee and carpenter bees (*Xylocopa* spp.) observed within and immediately adjacent to the Open Space Mitigation Area are also depicted as green stars on

Exhibit 3. Many of the green stars represent floral resources such as *Phacelia* spp., that have been documented nectar plants on other sites in southern California. Such observations regarding presence of other bumblebee species and favored CBB nectar plants. One of the GLA's senior wildlife biologists, who conducted the surveys noted that "…there are far more floral resources across the open space than are mapped. The entire Open Space Mitigation Area is suitable for floral resources for CBB. The scrub and chaparral are diverse and supports many plant species on which we have detected CBB including deerweed and all sages. There is also phacelias and honeysuckle that we have observed as nectaring [plants] on other sites". Thus, all the vegetation alliances listed in Table 3, accounting for 571.58 acres, are documented to provide some form of suitable habitat for the CBB within the Open Space Mitigation Area.

Table 3. Summary of Mitigation Area Within Open Space Mitigation Area

VEGETATION ALLIANCE/LAND USE TYPE	ACREAGE
OPEN SPACE MITIGATION	
Habitat Potentially Suitable for CBB	
Acmispon glaber Shrubland Alliance (Deerweed Scrub)	91.93
Artemisia Californica Shrubland Alliance (California Sagebrush Scrub)	92.60
Avena barbata Bromus rubens Herbaceous Semi-Natural Alliance (Wild Oats	3.83
Baccharis salicifolia Shrubland Alliance (Mulefat Thickets)	0.07
Ceanothus crassifolius Shrubland Alliance (Hoary Leaf Ceanothus Chaparral)	15.43
Centaurea melitensis Herbaceous Semi-Natural Alliance (Star-Thistle Fields)	5.82
Eriogonum fasciculatum Shrubland Alliance (California Buckwheat Scrub)	46.96
Heteromeles arbutifolia Shrubland Alliance (Toyon Chaparral)	1.30
Malosma laurina Shrubland Alliance (Laurel Sumac Scrub)	271.11
Platanus racemosa Quercus agrifolia Woodland Alliance (California Sycamore Coast Live Oak Woodland)	5.19
Quercus agrifolia Woodland Alliance (Coast Live Oak Woodland)	33.64
Salix gooddingii Woodland Alliance (Goodding Willow Woodland)	1.19
Salvia mellifera Shrubland Alliance (Black Sage Scrub)	2.51
Subtotal (Habitat Potentially Suitable for CBB)	571.58
Land Cover Not Suitable for CBB	
Disturbed/Developed Areas	7.60
TOTAL	**579.18**
AVOIDANCE	
Acmispon glaber Shrubland Alliance (Deerweed Scrub)	10.50
Adenostoma fasciculatum Shrubland Alliance (Chamise Chaparral)	3.32
Artemisia Californica Shrubland Alliance (California Sagebrush Scrub)	4.81
Ceanothus crassifolius Shrubland Alliance (Hoary Leaf Ceanothus Chaparral)	12.93
Dendromecon rigida Shrubland Alliance (Bush Poppy Scrub)	1.47
Disturbed/Developed Areas	1.16

Eriodictyon crassifolium Shrubland Alliance (Yerba Santa Scrub)	0.41
Eriogonum fasciculatum Shrubland Alliance (California Buckwheat Scrub)	9.91
Heteromeles arbutifolia Shrubland Alliance (Toyon Chaparral)	1.64
Malosma laurina Shrubland Alliance (Laurel Sumac Scrub)	36.90
Platanus racemosa Quercus agrifolia Woodland Alliance (California Sycamore Coast Live Oak Woodland)	2.98
Quercus agrifolia Woodland Alliance (Coast Live Oak Woodland)	3.41
Quercus berberidifolia Shrubland Alliance (Scrub Oak Chaparral)	0.90
TOTAL	90.34

The CESA stipulates that the measures or alternatives required for an ITP shall be roughly proportional in extent to any impact on the covered species as a result of a Project. The approved Project includes 221 single-family homes on the Development Site, of which approximately 164.63 acres would be impacted by development activity (see Exhibit 3 – Site Development Plan). The Open Space Mitigation Area includes the permanent conservation of approximately 600 acres of open space, of which approximately 571 acres consist of vegetation alliances that are suitable and, based on surveys in 2025, consist of occupied habitat for covered species. Thus, the conserved habitat, which is occupied by the covered species, will more than meet the "roughly proportional" criterion necessary to mitigate impacts to the covered species.

In this regard, it is important to note that for a recently issued ITP[1] for CBB, the CDFW required a ratio of 1.5:1 consisting of a combination of restoration and enhancement. The preservation of the Open Space Mitigation Area as part of the Project results in conservation of substantial areas of high-quality chaparral and coastal sage scrub that are both suitable for and occupied by the CBB at a ratio (noted below) that is more than double (by acres) than required for the ITP referenced above. In addition, the value of the conserved habitat is enhanced due to its being situated within a substantially larger block of regionally important open space associated with the Verdugo Mountains. This large area of regional open space includes large areas of chaparral and coastal sage scrub that is suitable for CBB. The percentage of suitable habitat for the CBB within the Project's Open Space Mitigation Area is a larger percentage of suitable habitat for the CBB within the impacted portion of the Development Site (approximately 164.63 acres for grading and 63.89 acres for fuel modification, for a total of 228.52 acres) than for the ITP noted above. Specifically, the conservation of approximately 600 acres of land as permanent open space, of which approximately 571.58 acres provide some form of suitable for the CBB, including oak woodland and riparian habitats that contribute to the overall integrity of the Open Space Mitigation Area), results in an effective mitigation ratio of approximately 2.5 to 1 (571.58 ÷ 228.5).

[1] California Department of Fish and Wildlife, 2024. California Endangered Species Act Incidental Take Permit No. 2081-2023-035-06 for the Shady View Project in Chino Hills, California.

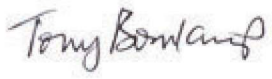
The CBB is subject to the rules and guidelines of 14 CCR § 783 regarding take of listed animals, which allow CDFW to issue permits using the same procedures and the same conditions as take authorizations issued pursuant to 14 CCR §783 *et seq*.: Take Prohibition; Permits for Incidental Take of Endangered Species, Threatened Species and Candidate Species, which implements Sections 2080 and 2081 of the California Fish and Game Code (CFGC).

The project applicant is seeking authorization, through submittal of an application pursuant to Section 2081(b) of the CESA, for coverage of incidental take that will result from removal of 228.5 acres of potentially occupied habitat for the CBB and authorization for conversion of occupied habitat to residential development, while conserving approximately 600 acres of habitat of which approximately 571.58 acres are suitable for and occupied by the covered species. This report supports the above-referenced application.

If you have any questions, please contact me at tbomkamp@wetlandpermitting.com or (949) 929-1651.

Sincerely,

GLENN LUKOS ASSOCIATES, INC.



Tony Bomkamp
Senior Biologist/Technical Director

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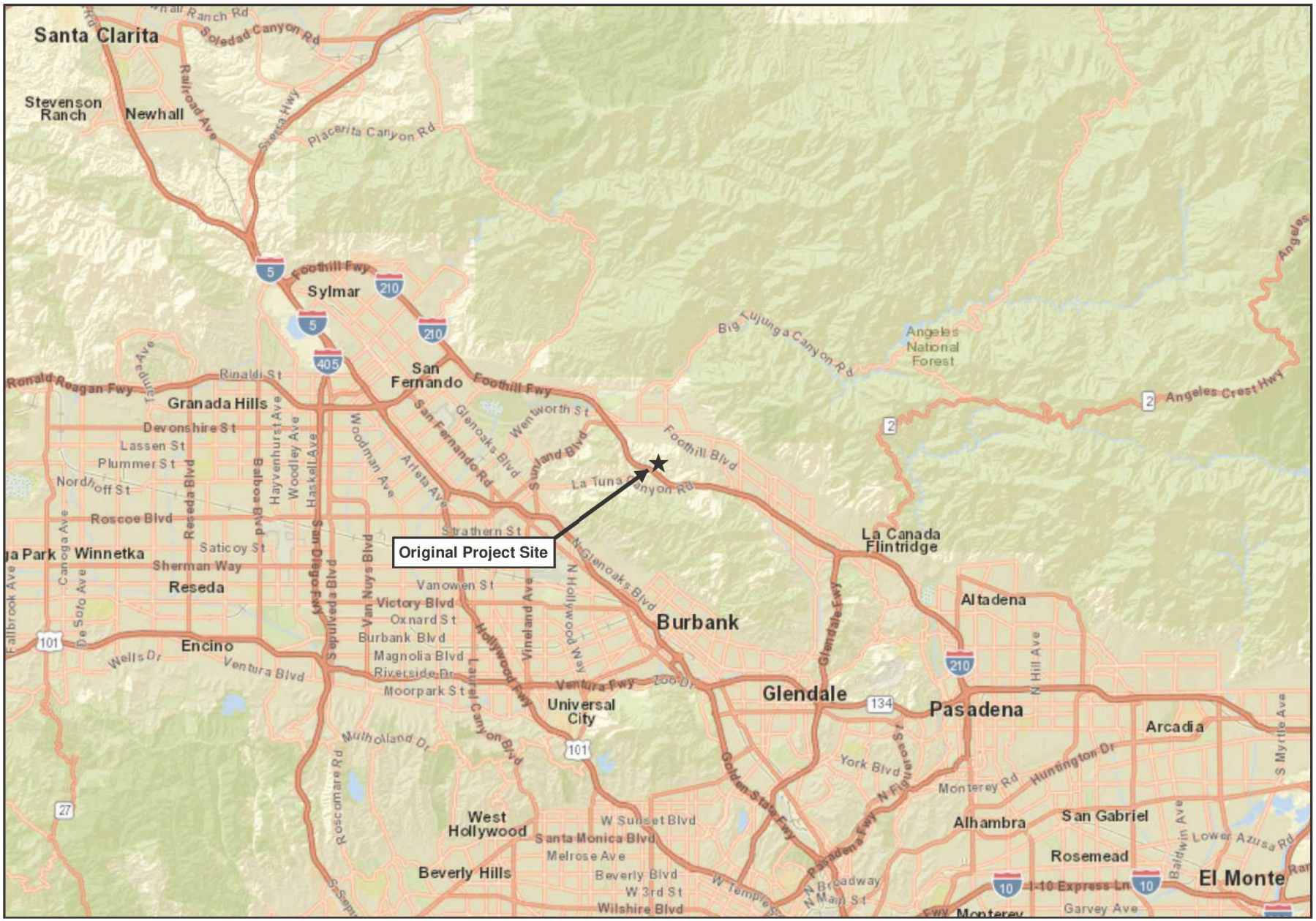


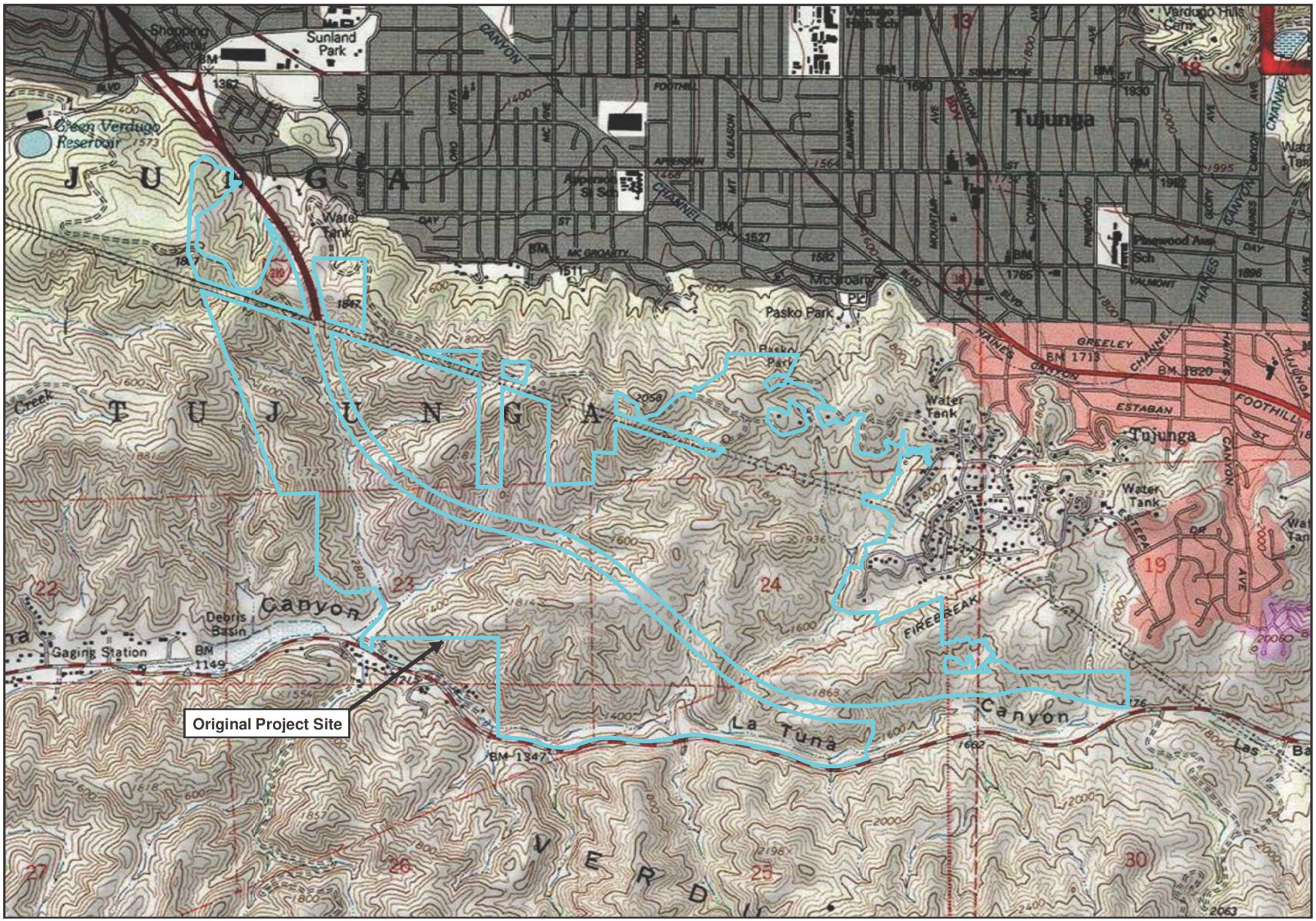
Source: ESRI World Street Map

CANYON HILLS

Regional Map

GLENN LUKOS ASSOCIATES

Exhibit 1



CANYON HILLS

Vicinity Map

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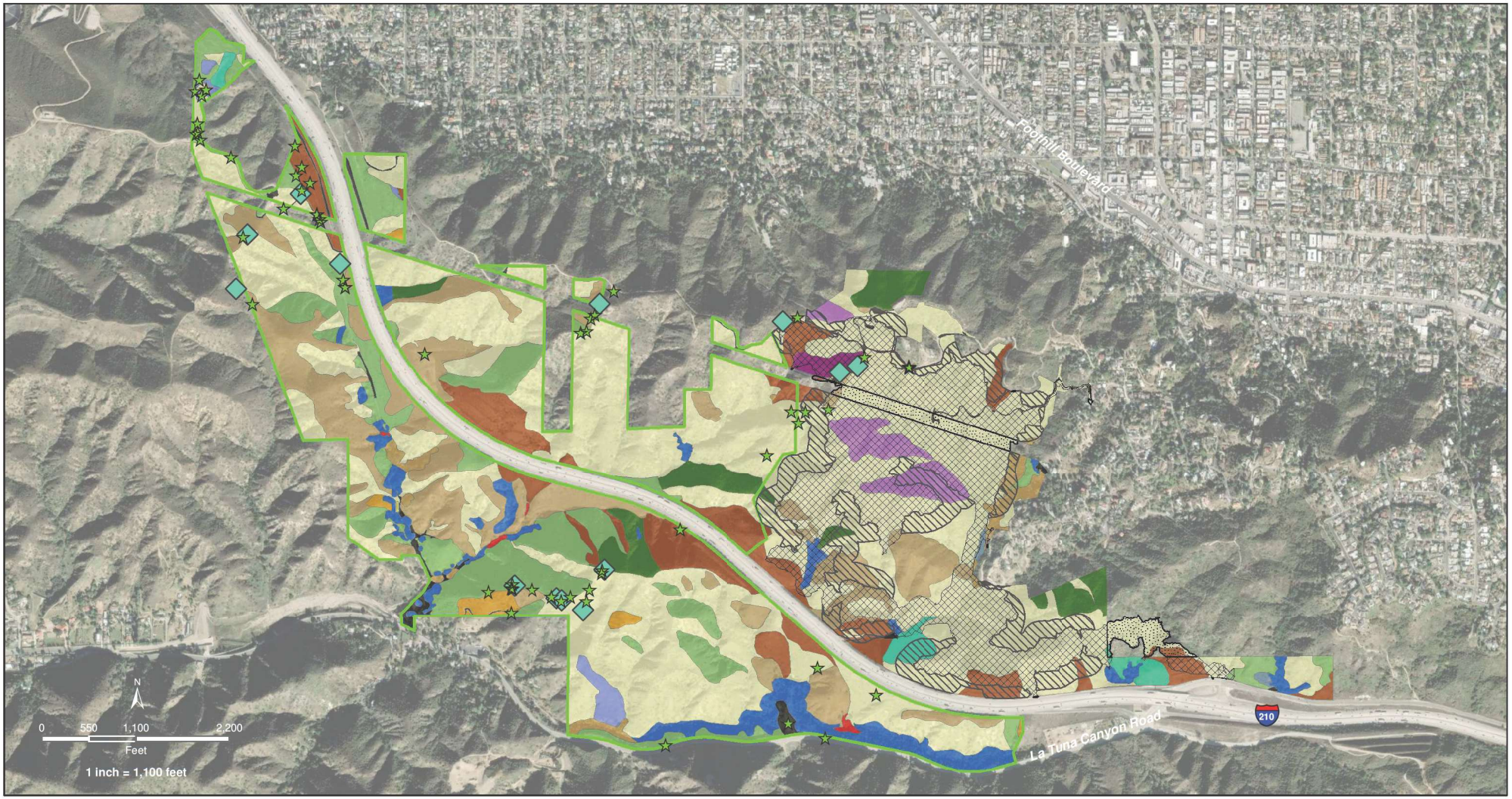
Exhibit 2



- Disturbance Limits (Onsite)
- Disturbance Limits (Offsite)
- Fuel Modification (Onsite)
- Dedication Limits
- Acmispon glaber Shrubland Alliance (Deerweed Scrub)
- Adenostoma fasciculatum Shrubland Alliance (Chamise Chaparral)
- Artemisia Californica Shrubland Alliance (California Sagebrush Scrub)
- Avena barbata – Bromus rubens Herbaceous Semi-Natural Alliance (Wild Oats and Annual Brome Grasslands)
- Baccharis salicifolia Shrubland Alliance (Mulefat Thickets)
- Ceanothus crassifolius Shrubland Alliance (Hoary Leaf Ceanothus Chaparral)
- Centaurea melitensis Herbaceous Semi-Natural Alliance (Star-Thistle Fields)
- Dendromecon rigida Shrubland Alliance (Bush Poppy Scrub)
- Disturbed/Developed Areas
- Eriodictyon crassifolium Shrubland Alliance (Yerba Santa Scrub)
- Eriogonum fasciculatum Shrubland Alliance (California Buckwheat Scrub)
- Heteromeles arbutifolia Shrubland Alliance (Toyon Chaparral)
- Malosma laurina Shrubland Alliance (Laurel Sumac Scrub)
- Platanus racemosa – Quercus agrifolia Woodland Alliance (California Sycamore – Coast Live Oak Woodland)
- Quercus agrifolia Woodland Alliance (Coast Live Oak Woodland)
- Quercus berberidifolia Shrubland Alliance (Scrub Oak Chaparral)
- Salix gooddingii Woodland Alliance (Goodding's Willow Woodland)
- Salvia mellifera Shrubland Alliance (Black Sage Scrub)
- Other
- Crotch's Bumble Bee

CANYON HILLS

Crotch's Bumble Bee Map

GLENN LUKOS ASSOCIATES

Exhibit 3

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Photograph 1: Looking north at areas with deerweed, suitable nectar plant for CBB.



Photograph 2: View of Mariposa lily in open space. GLA has observed CBB using Mariposa lilies for night-time sheltering.



Photograph 3: Dense deerweed, common nectar plant for CBB.



Photograph 4: View of site looking south showing the mix of vegetation alliances.

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Exhibit 4 – Site Photos

CANYON HILLS

Site Photographs