

Requested Incidental Take Permit for Crotch's Bumble Bee (Canyon Hills Project)

7000 La Tuna Canyon Road, City of Los Angeles, California

Draft Supplemental Environmental Impact Report

City of Los Angeles Case No. ENV-2002-2481-EIR
State Clearinghouse No. 2002091018

October 2025

Responsible Agency:
California Department of Fish and Wildlife



South Coast Region 5
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1 Executive Summary and CEQA Principles

1.1 Introduction

This document is a Draft Supplemental Environmental Impact Report (Draft Supplemental EIR) associated with the Canyon Hills Project (Approved Project), City of Los Angeles Case No. ENV-2002-2481-EIR and State Clearinghouse No. 2002091018. The City Council of the City of Los Angeles (City) certified a Final Environmental Impact Report (Final EIR) on October 19, 2005 for the Approved Project.

In accordance with the California Environmental Quality Act (CEQA), this Draft Supplemental EIR analyzes the Approved Project's impact on Crotch's Bumble Bee (CBB), which was recently discovered on the remaining project site of approximately 300 acres of undeveloped land located at 7000 La Tuna Canyon Road, Los Angeles (Project Site).

This Draft Supplemental EIR has been prepared in connection with the request by the applicant Whitebird, Inc. doing business in California as California Whitebird, Inc. (Applicant), for an Incidental Take Permit (ITP) under Section 2081(b) of the California Endangered Species Act (CESA). The Applicant is seeking authorization from the California Department of Fish and Wildlife (CDFW) to incidentally take CBB because it is expected to be incidentally taken during the removal of up to 164 acres of potentially occupied CBB habitat.

This Draft Supplemental EIR demonstrates that the Approved Project would have a potentially significant impact on CBB associated with the requested ITP and that significant impact will be mitigated below a level of significance as a result of the permanent preservation of approximately 579 acres of the original, approximately 900-acre Project Site (Original Project Site) as open space.

CDFW is acting as a responsible agency with respect to the requested ITP and has prepared this Draft Supplemental EIR as the public agency that is considering a subsequent discretionary approval for the ITP.

1.2 Purpose of the Supplemental EIR

The purpose of this Draft Supplemental EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the Approved Project's impact on the CBB associated with the requested ITP.

As described in Section 15121(a) and 15362 of the CEQA Guidelines,¹ an environmental impact report is an informational document that informs public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to mitigate any significant

¹ The CEQA Guidelines (Title 14, Division 6, Chapter 3 of the California Code of Regulations) are administrative regulations governing implementation of the California Environmental Quality Act. The CEQA Guidelines reflect the requirements set forth in the Public Resources Code, as well as court decisions interpreting the statute and practical planning considerations. Among other things, the CEQA Guidelines explain how to determine whether an activity is subject to environmental review, what steps are involved in the environmental review process, and the required content of environmental documents. The CEQA Guidelines apply to public agencies throughout the State, including local governments, special districts, and State agencies, <https://cci.ca.gov/ceqa/guidelines/#what-are>, accessed August 15, 2025.

environmental effects, and if significant environmental effects are anticipated to occur identify and evaluate a reasonable range of alternatives to the project that have the potential to mitigate or avoid the project's potential significant environmental effects while feasibly accomplishing most of the project's basic goals.

1.3 Scope of Responsible Agency Authority

CDFW is a responsible agency with respect to the requested ITP and is authorized to prepare this Draft Supplemental EIR to address the Approved Project's potential impact on the CBB associated with the requested ITP. CEQA Guidelines Section 15041(b) outlines the authority of a responsible 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.

Similarly, CEQA Guidelines Section 15096(g)(1) limits the responsible agency compared to lead agencies when it comes to imposing mitigation measures:

(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, this Draft Supplemental EIR focuses solely on the Approved Project's impact on the CBB and the appropriate mitigation with regard to that impact because the requested ITP relates solely to the Approved Project's impact on the CBB.

Members of the public expressed that an additional ITP should be required because the Approved Project would result in the take of mountain lions. As discussed in this Draft Supplemental EIR solely for informational purposes, however, the Approved Project is not expected to result in the incidental take of mountain lions, and as a result the Applicant is not seeking incidental take authorization for mountain lion. In any event, the Final EIR adequately analyzed the Approved Project's impact on the mountain lion.

1.5 Project Background

The City of Los Angeles Department of City Planning determined that the project as originally proposed (Original Project), which included 280 single-family homes on both the north and south sides of Interstate 210 (I-210 Freeway), required the preparation of an EIR. On September 6,

2002, the City issued a Notice of Preparation (NOP) regarding the preparation of a Draft Environmental Impact Report (Draft EIR) for the Original Project in order to solicit comments on the proposed content of the Draft EIR. On October 2, 2003, the City released the Draft EIR for public comment for a period of 90 days.²

The Final EIR, which incorporated responses to all comment letters received on the Draft EIR from the public and governmental agencies, was released on September 7, 2004.³ On October 19, 2005, the Los Angeles City Council (City Council) certified the Final EIR and granted certain discretionary approvals for the Approved Project, including the final approval of Vesting Tentative Tract Map No. 061672. The Approved Project includes 221 single-family homes, all of which are located solely on the north side of the I-210 Freeway.

In May 2014, an Addendum to the Final EIR (Addendum) was prepared in connection with in-depth surface and subsurface field explorations of the soils onsite.⁴ The soils were found to bulk (expand) instead of shrink as had been assumed, which increased the grading balance and export condition. The Approved Project's street and pad grades were raised in strategic areas of the Project Site to accommodate the bulk soil and thereby allow for balanced grading onsite, consistent with the environmental analysis in the Final EIR.

1.6 Environmental Review Process

1.6.1 Notice of Preparation

In compliance with Section 15082 of the CEQA Guidelines, a NOP of this Draft Supplemental EIR was prepared by CDFW and distributed to the State Clearinghouse, California Governor's Office of Land Use and Climate Innovation (LCI), and other interested parties on August 1, 2025.

The NOP was circulated for public review and comments for a minimum 30-day review period beginning on August 1, 2025 and ending on September 2, 2025.

Appendix A to this Draft Supplemental EIR contains a copy of the NOP.

189 comment letters were received, raising the following issues:

- Providing housing in the proposed location
- Wildfire and the Very High Fire Hazard Severity Zone

² The Draft EIR is available on the City of Los Angeles Department of City Planning website: <https://planning.lacity.gov/eir/CanyonHillsProject/CanyonHillIDEIR/Canyon%20Hills.htm>

³ The Final EIR is available on the City of Los Angeles Department of City Planning website: <https://planning.lacity.gov/eir/CanyonHillsProject/CanyonHillFEIR/Canyon%20Hills%20FEIR%20Web%20Page.htm>

⁴ The 2014 Addendum is available on the City of Los Angeles Department of City Planning website: https://planning.lacity.gov/eir/CanyonHillsProject/Additional_Docs/Canyon_Hills_May_2014_FEIR_Addendum.pdf

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- Presence of mountain lions
 - Disruption of wildlife corridor
 - Cumulative impacts on species from habitat fragmentation and development
 - Tribal cultural resources
 - Utilities, energy, greenhouse gas emissions
 - Climate resilience and ecological sustainability

Appendix B to this Draft Supplemental EIR contains the written comments received by CDFW in response to the NOP.

As explained above, this Draft Supplemental EIR focuses solely on the Approved Project's impact on the CBB and the appropriate mitigation with respect to that impact because the requested ITP relates solely to the Approved Project's impact on the CBB. The other topics in the comment letters are beyond the scope of the requested ITP and CDFW's limited authority here. CEQA does not require a responsible agency to address environmental issues outside its statutory authority. Issues raised in the comment letters that pertain to unrelated species, environmental resources and project elements fall outside both the defined scope of the ITP process and CDFW's authority and therefore are not considered in this focused Draft Supplemental EIR.

1.6.2 Environmental Review Process

This Draft Supplemental EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days. After completion of the 45-day review period, a Final Supplemental EIR will be prepared that responds to comments submitted during the review period that raise environmental issues. This Draft Supplemental EIR will then be modified if and as required.

CDFW will make the Final Supplemental EIR available to agencies and the public prior to considering certification of the Final Supplemental EIR. All comments or questions about the Draft Supplemental EIR should be addressed to:

California Department of Fish and Wildlife
Attention: Canyon Hills ITP

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

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

1.7 Organization of Draft Supplemental EIR

This Draft Supplemental EIR analyzes the Project's impact on the CBB and is organized in the following sections:

Section 1 (Executive Summary): This section provides an introduction to the environmental review process per CEQA, a summary of the project description, environmental impacts and alternatives.

Section 2 (Project Description): A discussion of the requested ITP, including the location of the Project Site and its characteristics, project objectives, and required discretionary actions. In addition, an overview of the environmental setting is provided, including a description of existing and surrounding land uses, and a list of related projects.

Section 3 (Environmental Impact Analysis): The Environmental Impact Analysis section is the primary focus of this Draft Supplemental EIR. The analysis addresses the Approved Project's potential environmental effects on the CBB.

Section 4 (Alternatives to the Approved Project): This section provides an overview of the alternatives previously evaluated in the Final EIR for the Approved Project and an additional reduced development footprint/reduced density alternative with respect to the requested ITP for the Approved Project. This section also includes a discussion of the project objectives and considers them in the context of the new reduced development footprint/reduced density alternative.

Section 5 (Preparers of the EIR and Persons Consulted): This section presents a list of the agencies and consultant team members that contributed to the preparation of this Draft Supplemental EIR.

Section 6 (References and Acronyms): This section provides definitions for all of the acronyms and abbreviations used in this Draft Supplemental EIR.

1.8 Alternatives to Requested ITP

Pursuant to CEQA Guidelines Section 15126.6, subd. (b) “[b]ecause an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project.”

Pursuant to CEQA Guidelines Section 15163(b), this Draft Supplemental EIR “need contain only the information necessary to make the previous EIR adequate for the project as revised.” Therefore, the alternatives analysis identifies and analyzes new project alternatives that relate to the Approved Project's impact on the CBB. The alternatives include:

- **No Project Alternative.** No development and the Project Site remains unchanged.
- **Reduced Development Footprint/Reduced Density Alternative.** Reduction in the number of homes by 30 percent, or 67 units, from 221 to 154, and reduction in number of developed acres by 25 percent, or 41 acres, from 164 to 123.

CEQA Guidelines Section 15126.6(e)(2) states that an analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR.

Section 15126.6(e)(2) also states that, should it be determined that the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

Here, the No Project Alternative would be the environmentally superior alternative because the Project Site would remain undeveloped. In this circumstance, pursuant to Section 15126.6(e)(2), the Reduced Development Footprint/Reduced Density alternative is considered the environmentally superior alternative. This alternative, however, would not meet certain project objectives, and would not meet other project objectives to the same extent as the Approved Project, due to the substantial reduction in the number of housing units in the City.

1.9 Summary Of Environmental Impacts

The recently discovered presence of the CBB on the current, approximately 300-acre Project Site led CDFW to evaluate the Approved Project's potentially significant impact on the CBB with respect to the requested ITP.

The Final EIR determined that the Approved Project's impact was less than significant with mitigation with respect to Biological Resources significance threshold question (a):

Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Section IV.D.1 of the Draft EIR for the Original Project analyzed the Original Project's biological impacts, including its impacts on special-status wildlife species. That analysis was based in part on the Biological Technical Report for the Project dated June 2003 and prepared by Glenn Lukos Associates (GLA), which report is attached as Appendix G to the Draft EIR. The Draft EIR effectively determined that the Original Project could potentially have a significant impact on any special-status wildlife species that had been detected or was expected to occur within the original development areas, including the Cooper's Hawk (*Accipiter cooperii*), the Ashy Rufous-Crowned Sparrow (*Aimophila ruficeps canescens*), the San Diego Coast Horned Lizard (*Phrynosoma coronatum blainvillii*), the Silvery Legless Lizard (*Anniella pulchra pulchra*) and the Orange-Throated Whiptail (*Cnemidophorus hyperythrus*).⁵

The Draft EIR determined, however, that this potentially significant impact would be less than significant with respect to all special-status wildlife species because approximately 652 acres of the Original Project Site would be preserved and remain undeveloped, and that land included sufficient native habitat similar to the habitat in the original development areas to mitigate the potentially significant biological impact.⁶

⁵ See Section IV.D.1, Biological Resources—Flora & Fauna, pages IV.D-58 through 60 of the Draft EIR, October 2003.

⁶ *Id.* The Draft EIR noted that the Project could nonetheless have a significant impact on the Cooper's Hawk, a raptor, if construction occurred during breeding season, so the Draft EIR recommended additional mitigation measures (D.1-5 and D.1-6) to mitigate that distinct impact.

The Draft EIR concluded with respect to the Original Project, as the Final EIR subsequently did regarding the less biologically impactful Approved Project, that the permanent preservation of most of the Original Project Site as open space effectively mitigated the Original Project's potentially significant impact on all special-status wildlife species (including the CBB) that could occur on the portion of the Original Project Site subject to development.

As discussed in more detail in Section 3 (Environmental Impact Analysis), in 2011, an affiliate of the Applicant and the Mountains Recreation and Conservation Authority recorded a conservation easement to permanently preserve approximately 579 acres of the Original Project Site (Public Open Space) as open space for public outdoor recreational and related educational purposes. Subsequently, in 2011 and 2013, fee title to the Public Open Space was transferred to the Desert and Mountain Conservation Authority (DMCA). The recordation of the conservation easement and subsequent transfer of fee title of the Public Open Space to DMCA ensured that the Public Open Space will be permanently preserved as open space. Therefore, no mitigation or alternatives that are considerably different from the permanent preservation of approximately two-thirds of the Original Project Site are necessary to reduce the Approved Project's impact on the CBB to below a level of significance.

In addition, if CDFW issues the requested ITP, it will be subject to numerous construction conditions that would minimize the impacts of the authorized take of the CBB. This will be through biological monitoring and other requirements that will further ensure that any impact to CBB will be less than significant.

2 Project Description

2.1 Project Summary

This Draft Supplemental EIR focuses solely on the Approved Project's impact on the CBB because the requested ITP relates solely to the Approved Project's impact on the CBB.

Members of the public previously expressed that an additional ITP should be required because the Approved Project would result in the take of mountain lion. As discussed below for informational purposes, however, the Approved Project is not expected to result in the take of mountain lions, and as a result the Applicant is not seeking incidental take authorization for mountain lion. In any event, the Final EIR adequately analyzed the Approved Project's impact on the mountain lion.

2.2 Project Details

The Project Site is located at 7000 La Tuna Canyon Road, City of Los Angeles, California.

The Original Project Site included approximately 900 acres of land. See **Figure 2-1, Original Project Site and Regional Vicinity**, for the location of the Original Project Site within the larger context of the local area. As discussed in the Draft EIR, the Approved Project as originally proposed included the development of 280 single-family homes on subdivided residential lots and approximately 652 acres of open space (Original Project), and that is the project that was analyzed in the Draft EIR. 211 of those 280 homes would have been constructed on approximately 142 acres of land north of the I-210 Freeway (Development Area A) and 69 homes would have been constructed on approximately 52 acres south of the I-210 Freeway (Development Area B). Development Area A would be accessed by a proposed roadway that connects to La Tuna Canyon Road at its intersection with the I-210 Freeway.

The reduced-size Approved Project ultimately approved by the City Council included 221 single-family homes, all located within Development Area A on the north side of the I-210 Freeway, with all development eliminated on the portion of the Original Project Site located south of the I-210 Freeway. The entitlements for the Project approved by the City Council included Vesting Tentative Tract Map. No. 061672, as amended, which established the lots on which the single-family homes, streets and other improvements will be developed. The Final EIR and the Addendum include more details regarding the Original Project and the Approved Project.

As discussed in the Glenn Lukos Associates report dated April 10, 2025 (GLA Report), and as shown in **Table 2-1** below, the Approved Project, as compared to the Original Project, reduced the impacted portion of the development site that includes habitat for the CBB from 194 acres to approximately 164 acres.¹

As part of the Approved Project, the City Council also approved a Development Agreement on July 5, 2006, pursuant to Ordinance No. 177701, which the City and the Applicant subsequently executed and caused to be recorded on October 11, 2006, as Instrument No. 06-2263468 in the

¹ GLA Report, page 13, **Appendix C** to this Draft Supplemental EIR.

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 preserve as permanent open space approximately 579 acres of the Original Project Site (Public Open Space), including the entirety of the portion of the Original Project Site located south of the I-210 and the western portion of the Original Project Site located north of the I-210, and to first offer the Public Open Space to the Santa Monica Mountains Conservancy (SMMC). See **Figure 2-2, Original Project Site, Current Project Site, and Public Open Space**, which shows the location of the Public Open Space.

Table 2-1
Summary of Vegetation Impacts for the Project Site

Vegetation Alliances	Total (Acres)
<i>Quercus agrifolia</i> Woodland Alliance	2.13
<i>Platanus racemosa</i> – <i>Quercus agrifolia</i> Woodland Alliance	0.98
<i>Ceanothus crassifolius</i> Shrubland Alliance	0.70
<i>Dendromecon rigida</i> Shrubland Alliance	12.68
<i>Heteromeles arbutifolia</i> Shrubland Alliance	0.84
<i>Adenostoma fasciculatum</i> Shrubland Alliance	0.28
<i>Quercus berberidifolia</i> Shrubland Alliance	0.27
<i>Malosma laurina</i> Shrubland Alliance	123.80
<i>Acmispon glaber</i> Shrubland Alliance	8.95
<i>Artemisia californica</i> Shrubland Alliance	0.14
<i>Eriogonum fasciculatum</i> Shrubland Alliance	10.03
<i>Eriodictyon crassifolium</i> Shrubland Alliance	3.83
Total (Habitat Potentially Suitable for CBB)	164.63
Table 2, GLA Report, Appendix C to this Draft Supplemental EIR.	

Thereafter, Whitebird Real Estate Holdings LLC (WREH), which owned the Public Open Space, 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.

Following the recordation of the Conservation Easement, WREH transferred to Desert and Mountain Conservation Authority (DMCA), another affiliate of SMMC, fee title to the Public Open Space 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. Therefore, DMCA has held title to the Public Open Space for more than 12 years.

2.3 Project Objectives

The Draft EIR set forth the objectives for the Approved Project, as follows:²

1. To provide a substantial amount of high-quality housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.
2. To provide greater regional housing opportunities for homebuyers and assist in satisfying the housing needs for the region.
3. To invigorate the local economy by providing employment and business opportunities associated with the construction, use, and occupancy of the proposed project.
4. To permanently preserve over 75 percent of the project site as open space.
5. To provide ample equestrian and other recreational amenities, as well as significant passive open space and landscaping areas.
6. To establish a low-density residential community that avoids the crowded appearance of a typical subdivision.
7. To provide a peaceful, attractive residential development within the context of the surrounding man-made and natural environment, and separate and shield the development to maximize environmental and land use compatibility with surrounding uses.
8. To locate the residential development in proximity to existing infrastructure and services where possible.
9. To provide safe, efficient and aesthetically attractive streets in the residential development with convenient connections to adjoining arterials and freeways, while minimizing traffic impacts on existing residential neighborhoods.
10. To minimize impacts to important natural landforms and significant natural resources.
11. To develop a residential project on the project site that is financially viable and thereby permits (1) the donation or dedication of all of the project site located outside the Development Areas to an appropriate public agency or nonprofit entity and (2) the development of public and private equestrian and other recreational amenities on the project site.

2.4 Related Projects

CEQA requires that an EIR analyze “cumulative impacts,” which are defined in the CEQA Guidelines Section 15355 as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines Section 15130(a) requires that an EIR discuss the cumulative impacts of a project when the

² See Section III, Project Description, pages III-9 to III-10 of the Draft EIR, October 2003.

project's incremental contribution to a significant cumulative effect is cumulatively considerable. In addition, an EIR is required to identify facts and analysis supporting its conclusion that the cumulative effect is less than significant, or that the project's contribution to a significant cumulative effect will be rendered less than cumulatively considerable. CEQA Guidelines Section 15130 indicates that the analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to "be guided by the standards of practicality and reasonableness." The cumulative impacts analysis considers the anticipated impacts of the relevant project aspect along with reasonably foreseeable growth. According to CEQA Guidelines Section 15130(b)(1), reasonably foreseeable growth may be based on:

- A list of past, present, and probable future projects producing related or cumulative impacts; and/or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary, along with the related projects contained within the study area. The Los Angeles Department of Transportation (LADOT) provided a list of three development projects within three miles of the Project Site³, two of which have since been completed and were operational at the time the Notice of Preparation for this Draft Supplemental EIR was released. Internal research disclosed one additional development project. Therefore, as shown in **Table 2-2, Related Projects**, there are two Related Projects. See **Figure 2-3, Related Projects Map**, for the locations of the Related Projects.

**Table 2-2
Related Projects**

#	Address	Distance from Site ¹	Proposed Use	Size	Existing use	Status ²
1	7577 Foothill Boulevard	2,100 feet north	Multi-Family Residential	46 units	Vacant (previous building removed)	Approved 2023, pending construction ²
2	7335 Foothill Boulevard	1,600 feet north	Office	3,250 sf	Vacant (Previous building removed)	Pending application ²

¹ Distance from Project Site is an approximate measurement from the nearest onsite boundary.

² Los Angeles City Planning, Bi-Weekly Entitlement Case Filings (2020-2024):

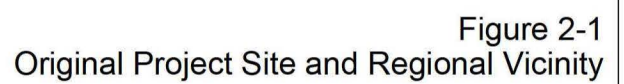
<https://planning.lacity.gov/resources/case-reports>, accessed January 23, 2025. This website was reviewed by CAJA for additional filed cases and to clarify the status of each case.

Los Angeles Planning Case Numbers:

No. 1: CPC-2021-9909-DB-SP-SPP-HCA

No. 2: DIR-2024-8266-SPPC

³ Related Projects List, Related Projects Summary from Case Logging and Tracking System Los Angeles Department of Transportation, January 22, 2025. This list provided by LADOT showing nearby Related Projects that have filed traffic reviews with LADOT.



Source: Google Maps 2025.

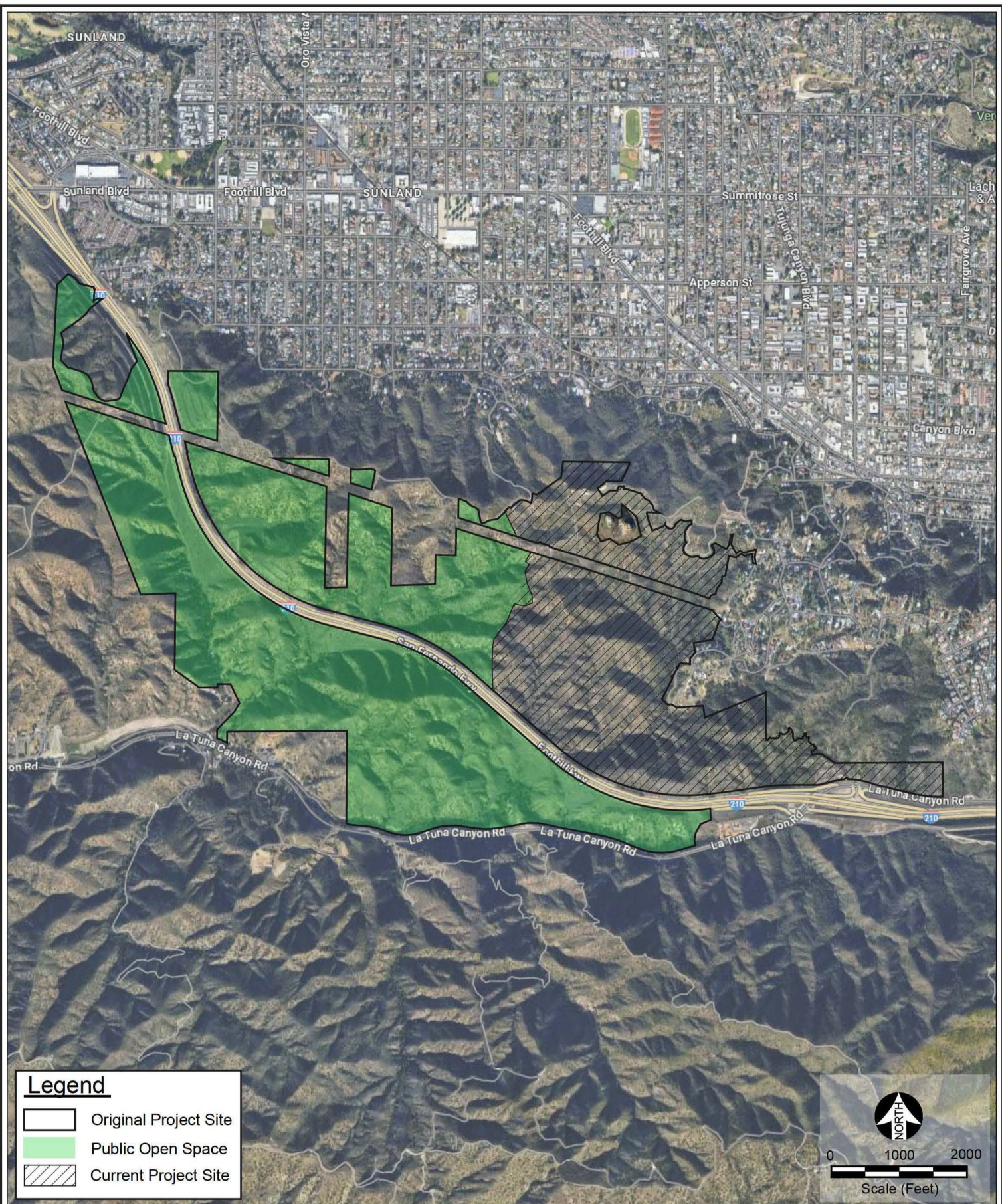


Figure 2-2
Original Project Site, Current Project Site, and Public Open Space

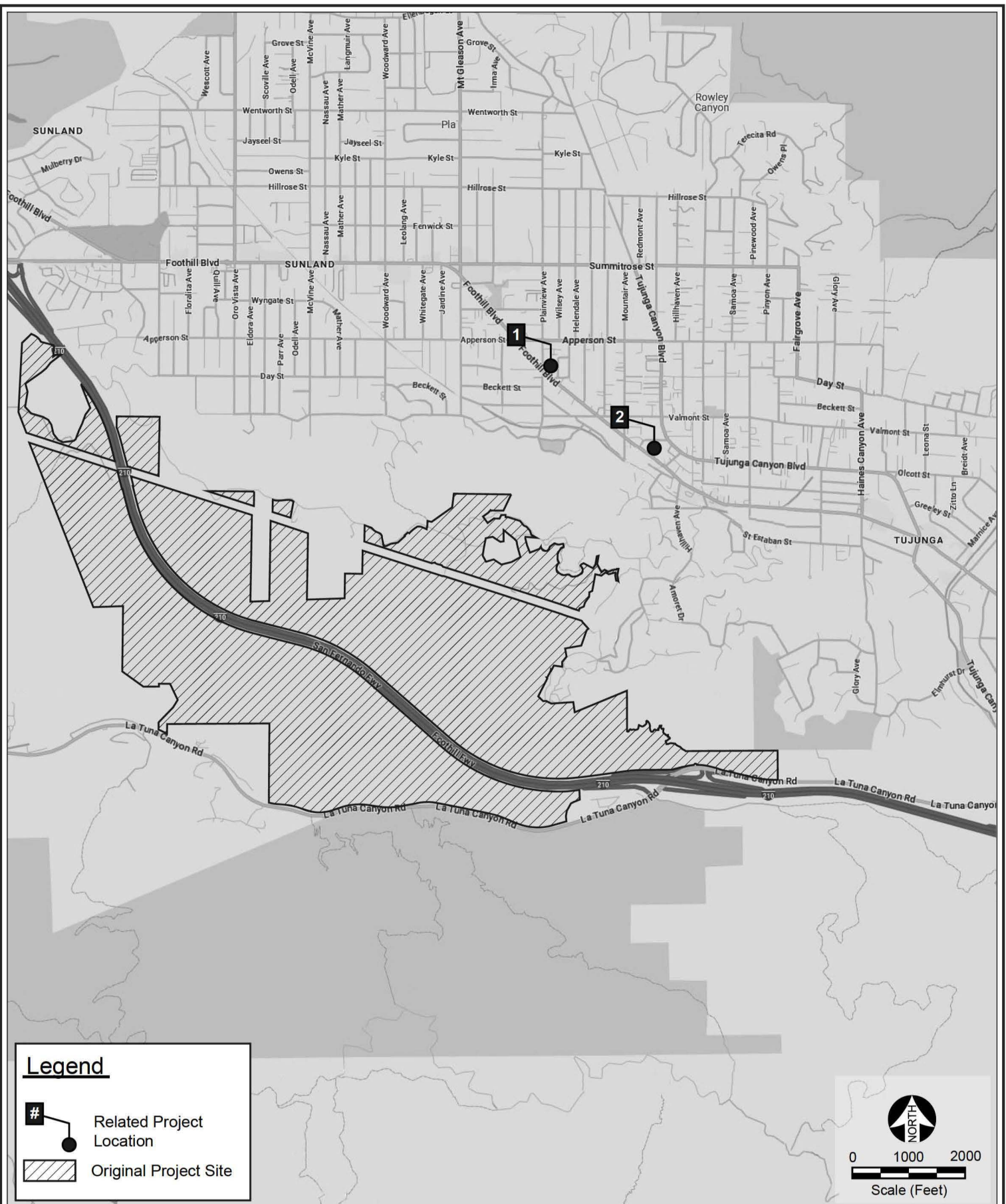


Figure 2-3
Related Projects Map

Source: Google Maps 2025.

3 Environmental Impact Analysis

The analysis below is based in part on a report of the CBB on the Original Project Site conducted by GLA, the project biologist, and related analysis, as summarized in its report dated August 4, 2024, updated April 10, 2025 (GLA Report), included as **Appendix C** to this Draft Supplemental EIR.

3.1 Regulatory Setting

3.1.1 California Endangered Species Act

Under CESA, the California Fish and Game Commission (Commission) is responsible for maintaining a list of threatened and endangered species.¹ The Commission also maintains a list of candidate species, which are species formally under review for addition to either the list of endangered species or the list of threatened species.

CESA prohibits the taking of plant and animal species that the Commission has designated as either threatened, rare, or endangered in California. “Take” in the context of this regulation means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill a listed species.² The take prohibitions also apply to candidates for listing under CESA. However, CESA Section 2081(b) allows CDFW to issue permits for incidental take of a CESA-listed species or CESA candidate species.

3.2 Crotch’s Bumble Bee

3.2.1 Background Information

The City of Los Angeles received a letter (CBB Letter) dated November 7, 2023³ that claimed the verified presence of the CBB on the Project Site in 2023. It included two California Natural Diversity Database (CNDDDB) Online Field Survey Form Reports submitted to the CDFW on March 27, 2023, and June 16, 2023.

The CNDDDB tracks 6 bumble bees (*Bombus* sp.) that are identified as species of greatest conservation need. Four of these bumble bees, including the CBB, were petitioned to the State of California in 2018 and the Fish and Game Commission advanced them to a Candidate species

¹ Pursuant to California Fish and Game Code Section 2070, the California Fish and Game Commission shall establish a list of endangered species and a list of threatened species and shall add or remove species from either list if it finds, upon the receipt of sufficient scientific information pursuant to this article, and based solely upon the best available scientific information, that the action is warranted.

² California Fish and Game Code Sections 86 and 2080.

³ Notice Of Presence Of Protected Species-Crotch’s Bumblebee - On Canyon Hills Development Site 7000 La Tuna Canyon Road, Los Angeles; Objection To Issuance Of Permits, Carstens, Black & Minter LLP to Los Angeles City Council and City Attorney, November 7, 2023.

under the CESA in June 2019.⁴ The CBB has a historic range that includes the Project Site and the rest of the Original Project Site (*i.e.*, the approximately 579 acres of Public Open Space).

3.2.2 Methodology

In response to the CBB Letter, GLA, the Approved Project's biological consultant, conducted an onsite investigation of the CBB. GLA biologists performed focused surveys for the CBB within suitable habitat areas within the Public Open Space. They did not survey the approximately 300-acre Project Site since the presence of the CBB has already been documented there. Based on previous vegetation mapping for the Original Project Site conducted for the Biological Technical Report previously prepared by GLA, the Public Open Space, similar to the current 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. The Public Open Space is therefore considered suitable habitat for the CBB.

3.2.3 Impact Discussion

The Final EIR determined that the Approved Project's impact was less than significant with mitigation with respect to Biological Resources significance threshold question (a):

Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Section IV.D.1 of the Draft EIR for the Original Project analyzed the Original Project's biological impacts, including its impacts on special-status wildlife species. That analysis was based in part on the Biological Technical Report for the Original Project dated June 2003 and prepared by GLA, which report is attached as Appendix G to the Draft EIR. The Draft EIR effectively determined that the Original Project could potentially have a significant impact on any special-status wildlife species that had been detected or was expected to occur within the original development areas, including the Cooper's Hawk (*Accipiter cooperii*), the Ashy Rufous-Crowned Sparrow (*Aimophila ruficeps canescens*), the San Diego Coast Horned Lizard (*Phrynosoma coronatum blainvillii*), the Silvery Legless Lizard (*Anniella pulchra pulchra*) and the Orange-Throated Whiptail (*Cnemidophorus hyperythrus*).⁵

The Draft EIR determined, however, that this potentially significant impact would be less than significant with respect to all special-status wildlife species because approximately 652 acres of the Original Project Site would be preserved and remain undeveloped, and that land included

⁴ CDFW, Updates to the legal status of bumble bees in California: <https://wildlife.ca.gov/Data/CNDDB/News/updates-to-the-legal-status-of-bumble-bees-in-california>: <https://wildlife.ca.gov/Data/CNDDB/News/updates-to-the-legal-status-of-bumble-bees-in-california>, accessed August 22, 2025.

⁵ See Section IV.D.1, Biological Resources—Flora & Fauna, pages IV.D-58 through 60 of the Draft EIR, October 2003.

sufficient native habitat similar to the habitat in the original development areas to mitigate the potentially significant impact.⁶

The Draft EIR concluded with respect to the Original Project, as the Final EIR subsequently did regarding the less biologically impactful Approved Project, that the permanent preservation of most of the Original Project Site as open space effectively mitigated the Original Project's potentially significant impact on all special-status wildlife species that could occur on the portion of the Original Project Site planned for development.

As discussed in the GLA Report with respect to the requested ITP for the CBB located on the Project Site, grading for the Approved Project will impact up to approximately 164.63 acres of suitable habitat for the CBB within the Project Site (see **Table 2-1** in Section 2, Project Description), which is expected to result in take of the CBB. Fuel modification associated with the operation of the Approved Project will impact an additional approximately 64.66 acres. Consistent with the analysis of the Approved Project's impact of special-status wildlife species in the Final EIR, this habitat impact on a State Candidate species, which receives the same protection as species listed under the CESA, is considered significant without mitigation. However, the Final EIR has already determined that the permanent preservation of approximately 579 acres of the approximately 900-acre Original Project Site as open space would mitigate the Approved Project's impact on any affected special-status wildlife species within the Project Site.⁷ The recordation of the Conservation Easement and subsequent transfer of fee title of the Public Open Space to DMCA ensured that the Public Open Space will be permanently preserved as open space.

Therefore, no mitigation that is considerably different from the permanent preservation of approximately two-thirds of the Original Project Site is necessary to reduce the Approved Project's impact on the CBB to below a level of significance. Furthermore, as discussed below, the GLA Report includes additional evidence that such preservation is sufficient to mitigate the Approved Project's impact on the CBB.

In addition, if CDFW issues the requested ITP for the CBB, it will be subject to numerous construction conditions that would minimize the impacts of the authorized take of the CBB. This will be through biological monitoring and other requirements that will further ensure that any impact on the CBB will be less than significant.

The Approved 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

⁶ *Id.* The Draft EIR noted that the Project could nonetheless have a significant impact on the Cooper's Hawk, a raptor, if construction occurred during breeding season, so the Draft EIR recommended additional mitigation measures (D.1-5 and D.1-6) to mitigate that distinct impact.

⁷ The Draft EIR states that the preserved open space includes 652 acres of land. That figure differs somewhat from the approximately 579 acres of land that comprise the Public Open Space because (1) while the development footprint for the Approved Project was reduced from approximately 194 acres to approximately 164 acres due primarily to the elimination of the development on the south side of the I-210 Freeway, the boundaries of the current Project Site and the portion therein that will be graded have been determined with more precision, and (2) the remaining Project Site includes additional open space areas that will be permanently preserved as open space. It remains the case, however, that a substantially greater portion of the Original Project Site will be permanently preserved as open space than would have occurred under the Original Project, which means that the Approved Project will have a reduced impact on special-status wildlife species as compared to the Original Project.

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 Final EIR effectively identified this type of potentially significant impact and the prior, permanent preservation of the Public Open Space was already determined to have mitigated those potential related impacts to below a level of significance.

3.2.4 Prior Mitigation

As discussed below and in the GLA Report, the preserved Public Open Space includes sufficient open space with substantial amounts of suitable habitat to mitigate the Approved Project's impact on the CBB to below a level of significance.

3.2.4.1 Habitat Conservation

As discussed in the GLA Report and shown in **Table 3-1** below, the approximately 579 acres of permanently preserved open space within the Public Open Space includes approximately 571.58 acres of land that consist of the vegetation alliances noted above that contain suitable floral resources for the CBB. GLA's surveys confirmed the CBB at 10 locations within the Public Open Space.

Table 3-1
Summary of Mitigation Area Within Open Space Mitigation Area

Vegetation Alliance	Acres
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 and Annual Brome Grasslands)	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
Total (Habitat Potentially Suitable for CBB)	571.58
Table 3, GLA Report, August 5, 2024, updated April 10, 2025, Appendix C to this Supplemental EIR.	

The Approved Project includes 221 single-family homes on the approximately 300-acre Project Site, of which approximately 231.38 acres would be impacted by development (166.72 acres) and fuel modification activity (64.66 acres). The Public Open Space includes the permanent preservation of approximately 579 acres of open space, of which approximately 571.58 acres consist of vegetation alliances that are suitable and, based on GLA's 2025 surveys discussed in

the GLA Report, consist of occupied habitat for the CBB. Thus, the conserved habitat, which is occupied by the covered species, exceeds the impacted acreage by more than two times in order to mitigate the Approved Project's impact on the CBB below a level of significance.

Moreover, the preservation of the Public Open Space as part of the Approved 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. 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 the CBB. The percentage of suitable habitat for the CBB within the Public Open Space is a larger percentage of suitable habitat for the CBB within the impacted portion of the Project Site (approximately 166.72 acres for grading and approximately 64.66 acres for fuel modification, for a total of approximately 231.38 acres) than noted above. Specifically, the conservation of approximately 579 acres of land as permanent Public Open Space, of which approximately 571.58 acres provide some form of habitat suitable for the CBB, including oak woodland and riparian habitats that contribute to the overall integrity of the Public Open Space), results in an effective mitigation ratio of approximately 2.5 to 1 ($571.58 \div 231.38$).

Therefore, the prior, permanent preservation of the Public Open Space has mitigated the Approved Project's significant impact on the CBB to below a level significance. However, to further ensure that the Approved Project's impact on the CBB will be less than significant, it is recommended that the following additional mitigation measures be implemented as part of the Approved Project:

Mitigation Measure CBB-MM-1:

- **Repeat Surveys Following Periods of Inactivity.** If project activities are suspended for longer than three (3) days during the Queen Flight Season (February 1 through March 31), the designated biologist shall perform one visual survey when survey conditions are met prior to re-starting project activities.
- **Pesticides.** Permittee shall not use pesticides such as insecticides or rodenticides within the project area. If pesticides must be used, including for habitat restoration and enhancement, Permittee shall consult with CDFW and may only use pesticides upon CDFW's written approval.
- **Designated Biologist(s).** Permittee shall submit to CDFW in writing the name, qualifications, business address, and contact information of the designated biologist(s) using the Biologist Resume Form or another format containing the same information at least 30 days before starting project activities. Permittee shall ensure that the designated biologist(s) are knowledgeable and experienced in the biology, natural history, collecting and handling of the CBB. The designated biologist(s) shall be responsible for monitoring project activities to help minimize and fully mitigate or avoid the incidental take of individual CBB. Permittee shall obtain CDFW approval of the designated biologist(s) in writing before starting project activities and shall also obtain approval in advance, in writing, if the designated biologist(s) must be changed.

-
- **Delineation of Habitat.** To minimize the disturbance of CBB habitat adjacent to the project area, Permittee shall clearly demarcate the boundaries off all project area disturbance limits relative to avoidance areas with posted signs, stakes, flags, rope or cord, and/or fencing as necessary.
 - **Education Program.** Permittee shall conduct an education program for all persons employed or otherwise working in the project area before performing any work. The program shall consist of a presentation from the designated biologist that includes a discussion of the biology and general behavior of the CBB, information about the distribution and habitat needs of the CBB, sensitivity of the CBB to human activities, its status pursuant to CESA including legal protection, recovery efforts, penalties for violations and Project-specific protective measures described in the ITP. Permittee shall prepare and distribute wallet-sized cards or a fact sheet handout containing this information for workers to carry in the project area. Permittee shall provide interpretation for non-English speaking workers, and the same instruction shall be provided to any new workers before they are authorized to perform work in the project area. Upon completion of the program, employees shall sign a form stating they attended the program and understand all protection measures.
 - **Trash Abatement.** Permittee shall initiate a trash abatement program before starting project activities and shall continue the program for the duration of the Project. Permittee shall ensure that trash and food items are contained in animal-proof containers and removed, ideally at daily intervals but at least once a week, to avoid attracting opportunistic predators.
 - **Hazardous Waste.** Permittee shall immediately stop and, pursuant to pertinent state and federal statutes and regulations, arrange for repair and clean up by qualified individuals of any fuel or hazardous waste leaks or spills at the time of occurrence, or as soon as it is safe to do so. Permittee shall exclude the storage and handling of hazardous materials from the project area and shall properly contain and dispose of any unused or leftover hazardous products off-site.
 - **Refuse Removal.** Upon completion of project activities, Permittee shall remove from the project area and properly dispose of all temporary fill and construction refuse, including, but not limited to, broken equipment parts, wrapping material, cords, cables, wire, rope, strapping, twine, buckets, metal or plastic containers, and boxes.

3.3 Cumulative Impacts

Pursuant to CEQA Guidelines Section 15355, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

Neither of the Related Projects identified in **Table 2-2** (Section 2, Project Description) would impact CBB as each Related Project is situated on previously disturbed and developed land, which is part of the existing environment and does not contribute to any cumulative impact. As a result, the Approved Project combined with the other Related Projects will not result in a significant cumulative impact. Accordingly, specific to the Approved Project, it will not have a cumulatively

considerable contribution to any significant cumulative effect on CBB and therefore the Approved Project's cumulative effect on CBB is less than significant.

3.4 Conclusion

As demonstrated by the discussion above, because the CBB is a Candidate Endangered species under the CESA, the Approved Project would have a significant impact on the CBB because it would eliminate approximately 164 acres of suitable habitat for the CBB and the presence of the CBB has been identified there. However, also as mentioned above, the permanent preservation of the approximately 579 acres of Public Open Space would mitigate the Approved Project's impact on CBB, as well as any other affected special-status wildlife species within the Project Site as determined in the Final EIR, to below a level of significance. In addition, if CDFW issues the requested ITP, it will be subject to numerous construction conditions that would limit take of the CBB to the Project Site through biological monitoring and other requirements.

3.5 Mountain Lion

This Draft Supplemental EIR has been prepared in connection with an ITP application with respect to the Approved Project's potential to incidentally take CBB. Members of the public previously expressed that an additional ITP should be required because the Approved Project would result in the take of mountain lions. As discussed below solely for informational purposes, however, the Approved Project is not anticipated to take mountain lions, and as a result the Applicant is not seeking an ITP for mountain lions. Therefore, the ITP would be limited to CBB and as a result, this Draft Supplemental EIR need only analyze the Approved Project's impact on CBB.

3.5.1 Background

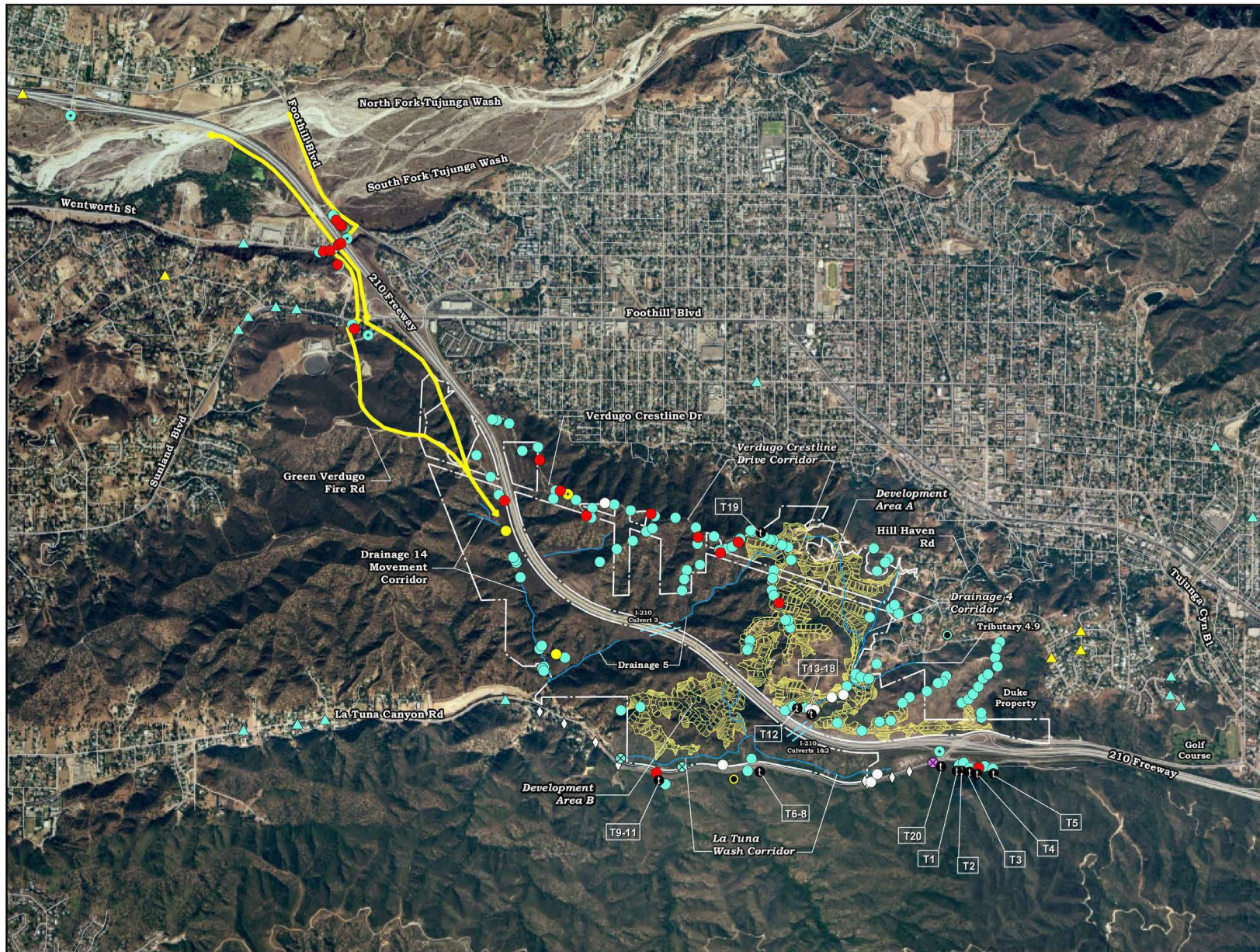
It is first noted that the Original Project's and Approved Project's potential impact on the mountain lion has already been analyzed. In connection with the preparation of the Draft EIR, GLA biologists prepared a Wildlife Movement Study dated April 2003 (2003 Study), based on extensive onsite investigations of the Original Project Site between March and December 2002, with a focus on mountain lion, mule deer, bobcat and coyote. While GLA did not observe any mountain lion, or physical evidence of any mountain lion, on the Original Project Site during its onsite investigations, the 2003 Study acknowledged that mountain lion could potentially use the Original Project Site for regional or local movement.

The 2003 Study identified the most likely regional pathway for large mammals, including the mountain lion, to travel between the Verdugo Mountains and the San Gabriel Mountains. As shown on **Figure 3-1, Wildlife Movement** (which is Exhibit 2 in the 2003 Study), and **Figure 3-2, Detail Of Missing Links, Linkage #27** (which is Exhibit 4 in the 2003 Study), this path of travel, from north to south, involves travel through the Tujunga Wash, then under Interstate I-210 (I-210) and along the southwest side of the I-210 through the tenuous "Missing Link" connection, then through Drainage 14, through the La Tuna Canyon Wash, across La Tuna Canyon Road and into the Verdugo Mountains. This tenuous regional wildlife movement corridor is a minimum of 1,800 feet from the current Project Site. Given this distance, and because this potential wildlife corridor for the mountain lion is in any event unlikely, GLA concluded with respect to the Original Project, as did the Final EIR regarding the less biologically impactful Approved Project, that the Original

Project would not impact regional wildlife movement because no development activity associated with Original Project would occur in or near the tenuous regional wildlife movement corridor.

While of substantially less importance than the potential regional movement path discussed in the preceding paragraph, the 2003 Study also identified a potential local wildlife corridor for mountain lions and other large mammals. Starting from the south in the Verdugo Mountains, this local movement corridor crosses La Tuna Canyon Road, then moves eastward through the La Tuna Canyon Wash, then goes under the I-210 at La Tuna Canyon Road, then through the adjacent undeveloped property to the east (referred to in the 2003 Study as the "Duke Property"), where it would cross the entry road for the Approved Project. From that point, a mountain lion would then move west in the vicinity of Drainages 4.9 and 4.14, then northward through Drainage 4 along the eastern boundary of the Project Site to Verdugo Crestline Drive. The Final EIR determined that there would be no significant impacts to regional or local wildlife movement associated with implementation of the Original Project.

Since GLA completed the 2003 Study, no material changes have occurred with respect to the Approved Project that affect the ability of mountain lions to use the tenuous regional movement path or the identified local movement path.



CANYON HILLS

City of Los Angeles | California

L E G E N D

- COYOTE SCAT
- ⊙ COYOTE SIGHTING
- COYOTE TRACK
- ⊗ DEAD COYOTE
- ▲ DEAD COYOTE (Swift et al. 1993)
- DEER SCAT
- ⊙ DEER SIGHTING
- DEER TRACK
- ⊗ DEAD DEER
- ▲ DEAD DEER (Swift et al. 1993)
- RACCOON TRACK
- FOX SCAT
- ⊗ DEAD SKUNK
- ◇ LA TUNA ACCESS
- TRACK STATIONS
- BLUELINE STREAM
- LOT LINES
- MISSING LINKS

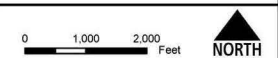


Figure 4

WILDLIFE MOVEMENT



andCanyonHills_memo_042003.mxd

April 2003

Figure 3-1
Wildlife Movement



CANYON HILLS

City of Los Angeles | California

L E G E N D

← "MISSING LINKS"
(Potential Movement Paths)

0 500 1,000 Feet N

Figure 5
DETAIL OF MISSING LINKS
LINKAGE #27

FS
FORNA SYSTEMS

WENTWORTH_2018_03_08_000000000000

March 2003

Figure 3-2
Details of Missing Links, Linkage #27

3.5.2 Subsequent Developments

Since the 2003 Study was completed, mountain lions have been observed on or in the vicinity of the Project Site. The mountain lion has been designated as a candidate species for listing as endangered or threatened under CESA. As a candidate species, it receives all the protections accorded to species listed as threatened or endangered under CESA. As a result, members of the public expressed that the Approved Project could impact the mountain lion.

CESA's take prohibition is found in section 2080 of the Fish and Game Code and states:

No person or public agency shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided in this chapter, the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of this code), or the California Desert Native Plants Act (Division 23 (commencing with Section 80001) of the Food and Agricultural Code).

Section 86 of the Fish and Game Code defines "take" as to hunt, pursue, catch, capture or kill.

Recently, according to a CNDDB form dated January 18, 2024, a mountain lion was observed on the Project Site. The entry describing the observation is as follows:

Adult female mountain lion was documented on a wildlife trail camera walking downstream at 10:30PM. At this location she paused, tripped the camera, and entered the streambed. The lion had previously been observed at 6AM at 34.238494°, -118.292020° heading NE along a ridge, and was subsequently observed again on 1/18/2024 at 6:05PM, heading SW following the same ridge. At this time she was observed scent marking in front of the camera. Same animal observed by Trailcam on 1/19/2024 at 1 :34 AM at 34.235928°, -118.286297° by Johanna Turner, animal heading south.

This is consistent with the other recent documentation of mountain lion use of the Verdugo Mountains, including P-41, which is now deceased, and an unnamed female mountain lion that has been observed on both the north and south sides of the I-210 in the vicinity of the Project Site. These observations reflect that mountain lion use the Project Site for local movement, a possibility that was discussed in the 2003 Study.

3.5.3 Take of Mountain Lion is Not Anticipated to Occur

GLA, the project biologist, indicated that it does not expect implementation of the Approved Project to take mountain lion and, as a result, the Applicant is not seeking take authorization from CDFW. As previously described, a "take" is defined as hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture, or kill. Based on that definition, GLA believes that the Approved Project would not result in any of the following actions: hunt, pursue, catch, capture, or attempt to hunt, pursue, catch or capture. GLA explained that first, there would be no potential for the Approved Project to include individuals constructing the Approved Project or who would live

in the development once constructed to hunt, or attempt to hunt, mountain lions because such activities are unrelated to the construction and occupancy of the Approved Project and are not legal and would be subject to enforcement by CDFW.

Second, there would be no potential for the Approved Project to include individuals constructing the Approved Project or individuals that would live in the development to pursue, or attempt to pursue, mountain lions because such activities are unrelated to the construction and occupancy of the Approved Project and are not legal and would be subject to enforcement by CDFW.

Third, there would be no potential for the Approved Project to include individuals constructing the Approved Project or individuals who would live in the development to catch, or attempt to catch, mountain lions because such activities are unrelated to the construction and occupancy of the Approved Project and not legal and would be subject to enforcement by CDFW.

Fourth, there would be no potential for the Approved Project to include individuals constructing the Approved Project or individuals who would live in the development once constructed to capture, or attempt to capture, mountain lions because such activities are unrelated to the construction and occupancy of the Approved Project and are not legal and would be subject to enforcement by CDFW.

The only remaining inquiry, then, is whether the Approved Project could in some manner result in the "killing" or attempted "killing" of a mountain lion. GLA advised that the remaining Project Site is adjacent to existing residential development to the north and east with the same conditions that could affect mountain lions as the additional 221 homes included in the Approved Project. Therefore, from an operational standpoint, the Approved Project would not introduce any new condition that could affect mountain lions, but rather would simply extend the existing residential areas.

That leaves the potential for the construction of the Approved Project to result in the killing of mountain lions. GLA believes, for many reasons however, the construction of the Approved Project would not result in the killing of mountain lions. First, construction would occur during daylight hours. The mountain lion is less active during daylight hours and is wary of humans and the type of noise that would be associated with grading and other construction activity, and would therefore avoid areas where development was occurring. It is particularly and extremely unlikely that a mountain lion would approach operating construction equipment, which would present the only material risk to a mountain lion during construction. GLA noted that a thorough search of the internet did not identify any instances where mountain lion mortality has been associated with construction equipment or construction activities.

In addition, the potential for vehicle collisions with mountain lions during construction is extremely low due to the nature of construction sites with accessways that do not allow for high-speed travel during periods of mountain lion activity. In like manner, the roadways within the completed development will not allow for high-speed travel and associated collisions with mountain lions and other wildlife.

For these reasons, GLA believes there is no potential for mountain lions to be killed in connection with the construction or operation of the Approved Project. As a result, the Applicant is not seeking

take authorization related to mountain lion. As such, this Draft Supplemental EIR only analyzes the Approved Project's impacts on CBB, the species covered in the requested ITP.

3.6 Tribal Cultural Resources

The Fernandeano Tataviam Band of Mission Indians (Tataviam Tribe) requested consultation with CDFW in an email dated July 16, 2025. In response to the request for consultation, CDFW had a remote meeting with the Tataviam Tribe on August 29, 2025. In that meeting, CDFW explained that CDFW is acting as a responsible agency associated with its potential issuance of an ITP for CBB. CDFW further explained that as a result of the ITP being limited to CBB, this Draft Supplemental EIR's analysis of the Approved Project's environmental effects is limited to such effects on CBB that are associated with the requested ITP. Accordingly, the Approved Project's impact on tribal cultural resources is beyond the scope of this Draft Supplemental EIR. The Tataviam Tribe representatives recognized the limited scope of analysis arising from CDFW's role as a responsible agency associated with it preparing this Draft Supplemental EIR for the ITP, and expressed appreciation for the consultation.

4 Alternatives to the Approved Project

4.1 Introduction

An EIR is generally required to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR must also evaluate the “no project” alternative. An EIR is not required to consider alternatives that are infeasible.

Given that this Draft Supplemental EIR is a supplement to the previously certified Final EIR, this alternatives analysis includes a summary of the prior alternatives that were analyzed in the Final EIR, a modified no project alternative and an additional Reduced Development Footprint/Reduced Density Alternative.

4.2 Project Objectives

The purpose of the alternatives analysis in an EIR is to evaluate a reasonable range of alternatives which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. For context, set forth below are the project objectives for the Approved Project stated in the Draft EIR:¹

1. To provide a substantial amount of high-quality housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.
2. To provide greater regional housing opportunities for homebuyers and assist in satisfying the housing needs for the region.
3. To invigorate the local economy by providing employment and business opportunities associated with the construction, use, and occupancy of the proposed project.
4. To permanently preserve over 75 percent of the project site as open space.
5. To provide ample equestrian and other recreational amenities, as well as significant passive open space and landscaping areas.
6. To establish a low-density residential community that avoids the crowded appearance of a typical subdivision.
7. To provide a peaceful, attractive residential development within the context of the surrounding man-made and natural environment, and separate and shield the development to maximize environmental and land use compatibility with surrounding uses.

¹ See Section III, Project Description, pages III-9 to III-10 of the Draft EIR, October 2003.

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8. To locate the residential development in proximity to existing infrastructure and services where possible.
 9. To provide safe, efficient and aesthetically attractive streets in the residential development with convenient connections to adjoining arterials and freeways, while minimizing traffic impacts on existing residential neighborhoods.
 10. To minimize impacts to important natural landforms and significant natural resources.
 11. To develop a residential project on the project site that is financially viable and thereby permits (1) the donation or dedication of all of the project site located outside the Development Areas to an appropriate public agency or nonprofit entity and (2) the development of public and private equestrian and other recreational amenities on the project site.

4.3 Analytical Assumptions And Methodology

The same level of detail is not required in the alternatives analysis as is required in the analysis of the project. Rather, an EIR should include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.”² As such, the alternatives analysis is presented as a comparative qualitative and quantitative analysis to the project, and assumes that all applicable mitigation measures proposed for the project would apply to each alternative. Impacts associated with each alternative are compared to the project’s impacts and are classified as increase, reduced, or essentially equivalent to the level of impact associated with the project.

4.4 Overview Of Project Alternatives In Final EIR

An EIR is required to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The project alternatives should feasibly attain “most of the basic objectives of the project,” even though implementation of the project alternatives might, to some degree, impede the attainment of some of those objectives or be more costly. The discussion of alternatives, need not be exhaustive, but rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

The following alternatives were evaluated in the Final EIR:

Alternative A: No Project Alternative.

Alternative B: Development Area A Only, 280 Lots.

Alternative C: Duke Property Alternative Access, 280 Lots (Access to Development Area A via the Duke Property). This was included as part of the Approved Project.

² Section 15126.6(d) of the State CEQA Guidelines.

Alternative D: Reduced Density, 87 Lots (87 single-family homes throughout the entire Project Site).

Alternative E: Reduced Density, 210 Lots (25% reduction in density in Development Areas A and B).

4.5 Alternatives Previously Rejected as Infeasible

As described above, Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. In addition to the five alternatives listed above, several other alternatives were considered and rejected in the Final EIR.

An alternative involving both hillside residential development and commercial uses on the flat portions of the Project Site along La Tuna Canyon Road was considered and rejected because the Project Site is not zoned for commercial uses. Furthermore, the development of commercial uses would not satisfy any of the project objectives other than invigorating the local economy by providing employment and business opportunities associated with the construction, use and occupancy of the project site.

An alternative involving the development of 569 single-family homes solely on the northern portion of the Original Project Site was considered and rejected for a variety of environmental considerations, including incompatibility with surrounding land uses, extensive grading, and impacts to biological and visual resources, traffic generation, and impacts to public services and utilities. This alternative was formulated by a prominent Southern California homebuilder several years ago after Whitebird acquired the Original Project Site.

Subsequently, the Applicant developed a proposal to construct approximately 375 single-family homes on the Original Project Site. This proposal was presented to the community and the former Councilmember for District 2. Based on comments received at that time, the Applicant revised the proposal to substantially reduce the project density to 280 single-family homes and preserve more than 75 percent of the Original Project Site as open space.

During the Notice of Preparation scoping period (for the Draft EIR), a reduced-footprint alternative was suggested that limited all development to two clusters. The first cluster, located north of the I-210 Freeway, would apparently have included all lots shown on the project site plan north of the SCE transmission lines, together with the lots that bordered the southern boundary of the transmission lines. These homes would have access from Verdugo Crestline Drive. The second cluster, located south of the I-210 Freeway, would have included approximately 15 lots located in the western portion of Development Area B. These lots would have a single means of access from La Tuna Canyon Road from a bridge shown on the project site plan. This alternative was considered and rejected because it would substantially increase traffic in the residential neighborhood north of the Original Project Site and would not be financially viable.

Alternative sites were not analyzed because the Applicant did not own or control other property within the City that would satisfy the project objectives.

With respect to Development Area A, an alternative was considered to provide secondary emergency access through Woodward Avenue, an existing 40-foot-wide public right-of-way adjacent to the northerly boundary line of the project site and near the northwest boundary of Development Area A. Most of Woodward Avenue south of Glenties Lane is unimproved, except for the portion of the road located near Foothill Boulevard that travels through an existing Sunland residential area. The improvement of Woodward Avenue for secondary access would provide little benefit for existing residents at the north end of the street because the neighborhood at the north end of Woodward Avenue is already fully developed in a grid pattern with many existing options for secondary emergency egress.

4.6 Updated and New Alternatives

To supplement the alternatives analysis in the Final EIR, this Draft Supplemental EIR reevaluates the No Project Alternative in the context of the requested ITP and evaluates an additional alternative, the Reduced Development Footprint/Reduced Density Alternative. This Draft Supplemental EIR is limited to the analysis of the Approved Project's impact on the CBB associated with the requested ITP, so this alternatives analysis focuses on the comparative differences in impacts on the CBB. The summary of the two alternatives is as follows:

- **No Project Alternative.** No development and the Project Site remains unchanged.
- **Reduced Development Footprint/Reduced Density Alternative.** Reduction in the number of homes by 30 percent, or 67 units, from 221 to 154, and reduction in number of developed acres by 25 percent, or 41 acres, from 164 to 123.

4.6.1 No Project Alternative

As required by CEQA, the Draft EIR analyzed a No Project Alternative. Under that No Project Alternative, the Approved Project, despite having already been approved, would not be constructed and the entire 900-acre Original Project Site, including the remaining approximately 300-acre Project Site, would remain undeveloped. The analysis of the No Project Alternative assumes the continuation of existing conditions. The potential environmental impact on the CBB associated with the No Project Alternative are described below and are compared to the potential environmental impact on the CBB associated with the Approved Project.

The No Project Alternative would not involve any grading or disturb any biological resources on the Project Site. In comparison, the Approved Project would impact the CBB. Under this alternative, the impact on the CBB would be reduced by 100 percent because no development would occur. Therefore, the biological resources impact with respect to the CBB under the No Project Alternative would be less than significant and less than those associated with the Approved Project's impact on the CBB.

Relationship to Project Objectives

The No Project Alternative with respect to the remaining Project Site would not satisfy most of the project objectives because no development would occur on the Project Site. It would not provide any housing or development (objectives 1, 2, 3, 6, 7, 8, 9), would not provide open space and recreational amenities and landscaped areas (objectives 4 and 5), and would not result in a

financially viable project (objective 11). The No Project Alternative would only satisfy one project objective:

10. Minimize impacts to important natural landforms and significant natural resources.

4.6.2 Reduced Development Footprint/Reduced Density Alternative

The Reduced Development Footprint/Reduced Density Alternative includes a 25 percent reduction in the developed acres on the Project Site, from 164 to 123 acres, a decrease of 41 acres, as shown in the red outlines on **Figure 4-1, Reduced Development Footprint/Reduced Density Alternative**, and a related 30 percent reduction in the number of homes, from 221 to 154 homes, a decrease of 67 homes. This alternative would require single-loaded portions of the internal streets, meaning that development would occur on only one side of some streets. The streets would not be modified because fire safety and evacuation requirements require full circulation. This configuration would reduce the overall footprint and intensity of development while maintaining necessary infrastructure for safety and access. This alternative also includes the elimination of a planned park area in the southwest portion of the Project Site.

Under this alternative, the impact on the CBB would be reduced by 25 percent because the development footprint would be reduced by 25 percent. However, the impact on the CBB would remain significant prior to mitigation because grading activities in the remaining 75 percent of the development area would impact the CBB and an ITP for the take of the CBB would still be required. In addition, and as discussed in Section 3, Environmental Impact Analysis, the Approved Project's impact on the CBB has been mitigated to a less-than-significant level by the permanent preservation of the approximately 600-acre Public Open Space. The permanent preservation of Public Open Space would similarly mitigate the impact of the Reduced Development Footprint/Reduced Density Alternative on the CBB to a less-than-significant level. Therefore, the Reduced Development Footprint/Reduced Density Alternative would have a lesser impact on the CBB than the Approved Project, but in either case the impact on the CBB with the previously implemented mitigation would be less than significant.

Relationship to Project Objectives

The Reduced Development Footprint/Reduced Density Alternative would not satisfy all of the project objectives because it would result in the development of substantially fewer homes with fewer recreational facilities. It includes only 154 homes, as compared to the 221 homes that comprise the Approved Project and the 280 homes included in the Original Project that was analyzed in the Draft EIR. Specifically, this alternative would not satisfy the following project objectives:

1. To provide a substantial amount of high-quality housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.
11. To develop a residential project on the project site that is financially viable and thereby permits (1) the donation or dedication of all of the project site located outside the Development Areas to an appropriate public agency or nonprofit entity and (2) the

development of public and private equestrian and other recreational amenities on the project site.

The Reduced Development Footprint/Reduced Density Alternative would satisfy the following project, although to a lesser extent than the Approved Project or the Original Project:

2. To provide greater regional housing opportunities for homebuyers and assist in satisfying the housing needs for the region.
3. Invigorate the local economy by providing employment and business opportunities associated with the construction, use and occupancy of the project site.
5. To provide ample recreational amenities, as well as significant passive open space and landscaping areas.

The Reduced Development Footprint/Reduced Density Alternative would satisfy all of the other project objectives.

4.7 Environmentally Superior Alternative

In addition to the discussion and comparison of impacts of a project and alternatives to that project, Section 15126.6(e) of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, the No Project Alternative, in which the entire Project Site would remain undeveloped, would result in no impact on the CBB. However, Section 15126.6(e)(2) states if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Among the other alternatives evaluated in the Final EIR and this Draft Supplemental EIR, the Reduced Development Footprint/Reduced Density Alternative would result in the least impact on the CBB because it would involve the fewest acres of grading and resulting ground disturbance (123 acres) within the Original Project Site. It is therefore considered to be the environmentally superior alternative. However, as previously discussed, the Reduced Development Footprint/Reduced Density Alternative would not meet certain project objectives and would not meet other project objectives to the same extent as the Approved Project, due to the substantial reduction in the number of housing units in the City.



Figure 4-1
Reduced Development Footprint/Reduced Density Alternative

5 Preparers of the EIR and Persons Consulted

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6 References and Acronyms

6.1 References

Almond Alliance of California v. Fish and Game Commission (2022) 79 Cal.App.5th 337

California Fish and Game Code Sections 86, 2070, 2080, 2081

CDFW, Updates to the legal status of bumble bees in California: <https://wildlife.ca.gov/Data/CNDDB/News/updates-to-the-legal-status-of-bumble-bees-in-california>: <https://wildlife.ca.gov/Data/CNDDB/News/updates-to-the-legal-status-of-bumble-bees-in-california>, accessed August 22, 2025

Canyon Hills Project, Draft Environmental Impact Report, October 2003, and Final Environmental Impact Report, October 2005, City of Los Angeles Case No. ENV-2002-2481-EIR and State Clearinghouse No. 2002091018

CEQA Guidelines Section 15041, 15096, 15126.6, 15162, 15163, 15355

Crotch's Bumble Bee Surveys, Glenn Lukos Associates, April 10, 2025

Friends of Westwood, Inc. v. City of Los Angeles, 191 Cal. App. 3d 259, 266-267, 272 (1987)

Notice Of Presence Of Protected Species-Crotch's Bumblebee - On Canyon Hills Development Site 7000 La Tuna Canyon Road, Los Angeles; Objection To Issuance Of Permits, Carstens, Black & Minter LLP to Los Angeles City Council and City Attorney, November 7, 2023

Public Resources Code Sections 5024.1, 5097.5, 5097.99, 21002.1(a), 21074(a), 21166, 21080.3.1, 21080.3.2.

6.2 Acronyms and Terms

Approved Project	221 single-family homes in Development Area A
CBB	Crotch's Bumble Bee
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFGF	California Fish and Game Code
City Council	Los Angeles City Council
CNDDB	California Natural Diversity Database
Conservation Easement	Grant of Conservation Easement to MRCA

DMCA	Desert and Mountain Conservation Authority
EIR	Environmental Impact Report
Draft EIR	Draft Environmental Impact Report
Final EIR	Final Environmental Impact Report
GLA	Glenn Lukos Associates
I-210	Interstate 210
ITP	Incidental Take Permit
LADOT	Los Angeles Department of Transportation
LCI	Governor's Office of Land Use and Climate Innovation
MRCA	Mountains Recreation and Conservation Authority
NOP	Notice of Preparation
Original Project	280 single-family homes in Development Areas A and B
Original Project Site	The approximately 900-acre project site for the Original Project
PRC	California Public Resources Code
Project Site	The approximately 300-acre project site for the Approved Project
SCH	State Clearinghouse
SMMC	Santa Monica Mountains Conservancy
Supplemental EIR	Supplemental Environmental Impact Report
Tataviam Tribe	Fernandeño Tataviam Band of Mission Indians
WREH	Whitebird Real Estate Holdings LLC