

Numerous project elements are currently inconsistent with Mission Canyon Specific Plan Policy Requirements, Hillside and Watershed Protection Policies, and Mission Canyon Tree Protection Policies, as acknowledged in the DEIR. Each of these elements requires a redesign in order for the County's decisionmakers to be able to establish consistency with applicable policies. Policy consistency is a non-negotiable project element; a project cannot be approved when inconsistent with applicable policies exist. These elements (described in detail below) include:

- a. West facing portions of the horticultural offices above the Gane House.
- b. Portions of the duplex and office/residence on the Cavalli site.
- c. The visitor admissions kiosk and restrooms on the west of Mission Canyon Road.
- d. The proposed Cavalli path
- e. The proposed detention basin.

The specific inconsistencies are described (by project element) below:

- **Horticultural Offices:** West-facing portions of the Horticultural offices above the Gane House protrude onto a slope in excess of 30%. A redesign of these structures to pull them off of the steep slope or reduce their footprint is necessary. Specifically, this project element is inconsistent with the Mission Canyon Area Specific Plan Landform Alterations policy that requires all development, including grading, on slopes of 30% or greater shall be avoided.
- **Duplex and Office/Residence on Cavalli Site:** Small portions of the proposed duplex and office/residence on the Cavalli site also protrude onto a slope of 30% or greater. These structures must be relocated off of the slope and redesigned. This project element is also inconsistent with the Mission Canyon Area Specific Plan Landform Alterations policy.
- **Visitor Admissions Kiosk:** The visitor admissions kiosk and restrooms on the west of Mission Canyon Road are located on the edge of an existing arroyo that runs along the western side of the main parking area. These structures must be moved off of the slope and closer to the parking area or in a flatter area of the entrance, requiring a redesign. This project element is also inconsistent with the Mission Canyon Area Specific Plan Landform Alterations policy.
- **Cavalli Path:** The proposed Cavalli path, a six-foot wide paved path winding up a steep hillside with slopes over 30%, would not be consistent with landform alteration policies, hillside and ridgeline policies, or tree protection policies. As the EIR states, it would result in significant vegetation removal, including several (13-15) mature oak trees, and would not minimize grading and site alteration. A less obtrusive path (i.e. narrower and unpaved) must be designed to avoid numerous biological and visual impacts, as well as potential erosion impacts. The potential erosion impacts, even with a path redesign, could result in erosion and runoff impacts. This trail should be eliminated from the project entirely.
- **Detention Basin:** The detention basin on the Hansen site adjacent to Las Canoas Road would require the removal of a large number of oak trees (approximately 10 trees). This basin must be redesigned or relocated in order to achieve consistency with County

policies related to tree protection and Hillside and Watershed protection policies related to slope stability issues (grading would be required on slopes greater than 30%).

Tree Protection: Additional inconsistencies exist with Mission Canyon Specific Plan Tree Protection policies. While the DEIR describes impacts to individual oak trees, it does not provide adequate impact details on other important trees, such as sycamores, California bays, alders, willows, and maples, as required by this policy. The policy analysis describing consistency with the Mission Canyon Area Specific Tree Preservation policy does not address the 80+ trees scheduled for removal. The DEIR policy consistency section only discusses approximately 25 of the proposed oak tree removals, and does not address other protected species as described above. Each of the protected trees to be removed must be discussed in adequate detail in the Policy consistency section of the document. The Policy consistency discussion is inadequate, addressing only the Cavalli path and the detention basin tree impacts.

The bottom line is that as described above, several elements of the project, as proposed, are INCONSISTENT with County policies. A new project description must be completed and a revised DEIR should be prepared in order for the public to be able to review any new environmental impacts created by the required redesign.