

CANYON HILLS NOP COMMENTS SUMMARY OF WRITTEN COMMENTS	Summary			Project Description				General Description of Environmental Setting		Long-Term Implications of the Proposed Project			Growth-Inducing Impacts of the Proposed Project		MMP	General	Comments		
	Summary of Proposed Project	Location	Project Background	Areas of Controversy	Alternatives	Summary Table	Statement of Objectives	Location and Boundaries	Construction Process	Project Characteristics	Overview of Environmental Setting	Related Projects	Relationship Between Local Short-Term Uses of Land vs. Long-Term Productivity	Irreversible Environmental Changes	How Project Could Foster Growth	Cumulative Impacts of Related Projects		Mitigation Monitoring and Reporting Program	General Comments
	Aerial of the project site.																		
<b>National Agencies</b>																			
<b>United States Department of Interior Fish and Wildlife Service</b> Carlsbad Fish and Wildlife Office Karen A. Evans Assistant Field Supervisor 2730 Loker Avenue West Carlsbad, California 92008																			
	X			X		X				X									
<b>State Agencies</b>																			
<b>Department of Transportation</b> Stephen J. Buswell IGR/CEQA Branch Chief District 7, Advance Planning 120 South Spring Street Los Angeles, California 90012																			
<b>Santa Monica Mountains Conservancy</b> Michael Berger Chairperson Ramirez Canyon Park 5750 Ramirez Canyon Road Malibu, California 90265																			
				X										X				Is requesting detailed information concerning on-site easements.	
<b>Department of Fish and Game</b> Morgan Wehtje Environmental Scientist IV 4949 Viewridge Avenue San Diego, California 92123																			
				X											X	X		Requesting a range of alternatives which avoid or minimize impacts to sensitive biological resources. A CESA permit must be obtained.	

CANYON HILLS NOP COMMENTS SUMMARY OF WRITTEN COMMENTS	Summary			Project Description				General Description of Environmental Setting		Long-Term Implications of the Proposed Project		Growth-Inducing Impacts of the Proposed Project		MMP	General	Comments			
	Summary of Proposed Project	Location	Project Background	Areas of Controversy	Alternatives	Summary Table	Statement of Objectives	Location and Boundaries	Construction Process	Project Characteristics	Overview of Environmental Setting	Related Projects	Relationship Between Local Short-Term Uses of Land vs. Long-Term Productivity	Irreversible Environmental Changes	How Project Could Foster Growth		Cumulative Impacts of Related Projects	Mitigation Monitoring and Reporting Program	General Comments
	<p><b>Native American Heritage Commission</b>  Rob Wood  Environmental Specialist III  915 Capitol Mall, Room 364  Sacramento, California 95814</p>																		
<p><b>Department of California Highway Patrol</b>  C.S. Klein  Commander, Altadena Area  2130 Windsor Avenue  Altadena, California 91001-5963</p>																		Request to place all utility poles near the interchange of La Tuna Canyon Road and Sunland Boulevard underground.	
<b>Regional Agencies</b>																			
<p><b>South Coast Air Quality Mangement District</b>  Steve Smith, Ph.D.  Program Supervisor, CEQA Section  21865 E. Copley Drive  Diamond Bar, California 91765-4182</p>																		Request for project to follow the CEQA Air Quality Handbook	
<p><b>Southern California Association of Governments</b>   Jeffrey M. Smith  Senior Regional Planner  Intergovernmental Review  818 West 7<sup>th</sup> Street 12<sup>th</sup> Floor  Los Angeles, California 90017-3435</p>																		No comments were submitted.	



















Gray Davis  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse



Tal Finney  
Interim Director

Notice of Preparation

September 5, 2002

To: Reviewing Agencies

Re: Canyon Hills Project  
SCH# 2002091018

Attached for your review and comment is the Notice of Preparation (NOP) for the Canyon Hills Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Maya Zaitzevsky  
Los Angeles City Planning Department  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Becky Frank  
Project Analyst, State Clearinghouse

Attachments  
cc: Lead Agency



**State Clearinghouse Data Base**

**SCH#** 2002091018  
**Project Title** Canyon Hills Project  
**Lead Agency** Los Angeles City Planning Department

**Type** NOP Notice of Preparation  
**Description** Vesting Tentative Tract Map, Development Agreement, and Major Plan Review to permit the construction of 280 single-family homes to be clustered on approximately 246 acres of the 887-acre project site. Approximately 210 homes will be constructed on approximately 176 acres north of Interstate 210 (Development Area A). The remaining 70 homes will be constructed on approximately 70 acres south of Interstate 210 (Development Area B). Approximately 641 acres (72.3 percent) of the project site will be preserved as permanent open space.

**Lead Agency Contact**

**Name** Maya Zaitzevsky  
**Agency** Los Angeles City Planning Department  
**Phone** 213 978-1355  
**small**  
**Address** 200 North Spring Street, Room 763  
**City** Los Angeles  
**Fax**  
**State** CA **Zip** 90012

**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Cross Streets** Verdugo Crestline Drive on the North and La Tuna Canyon Road on the South  
**Parcel No.**  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** 210  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use**

**Project Issues** Aesthetic/Visual; Air Quality; Biological Resources; Archaeologic-Historic; Geologic/Seismic; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Water Quality; Landuse; Population/Housing Balance; Noise; Public Services; Recreation/Parks; Traffic/Circulation; Other Issues

**Reviewing Agencies** Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Native American Heritage Commission; State Lands Commission; Caltrans, District 7; Department of Housing and Community Development; California Highway Patrol; State Water Resources Control Board, Division of Water Rights; Regional Water Quality Control Board, Region 4

**Date Received** 09/05/2002 **Start of Review** 09/05/2002 **End of Review** 10/04/2002

Note: Blanks in data fields result from insufficient information provided by lead agency.

Resources Agency

- Resources Agency  
Nadell Gayou
- Dept. of Boating & Waterways  
Bill Cunny
- California Coastal Commission  
Elizabeth A. Fuchs
- Dept. of Conservation  
Roseanne Taylor
- Dept. of Forestry & Fire Protection  
Alan Robertson
- Office of Historic Preservation  
Hans Kwartberg
- Dept. of Parks & Recreation  
B. Noah Tighman
- Reclamation Board  
Pam Bruner
- S.F. Bay Conservation & Dev't Comm.  
Steve McAdam
- Dept. of Water Resources  
Nadell Gayou

Fish and Game

- Dept. of Fish & Game  
Scott Fink
- Environmental Services Division
- Dept. of Fish & Game 1  
Donald Koch
- Dept. of Fish & Game 2  
Barry Curtis
- Dept. of Fish & Game 3  
Robert Fiorike
- Dept. of Fish & Game 4  
William Laudermilk
- Dept. of Fish & Game 5  
Don Chadwick
- Dept. of Fish & Game 6  
Gabrina Gatchel
- Dept. of Fish & Game 6 IMA  
Tamiy Allen
- Region 6, Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Game 6  
Tom Napoli

Independent Commissions

- California Energy Commission  
Environmental Office
- Native American Heritage Commn.  
Debbie Treadway
- Public Utilities Commission  
Ken Lewis
- State Lands Commission  
Betty Silva
- Governor's Office of Planning & Research  
Stata Clearinghouse Planner

Colorado River Board

- Colorado River Board  
Gerald R. Zimmerman
- Tahoe Regional Planning Agency (TRPA)  
Lyn Barnett
- Office of Emergency Services  
John Rowden, Manager
- Delta Protection Commission  
Debbie Eddy
- Santa Monica Mountains Conservancy  
Paul Edelman

Dept. of Transportation

- Dept. of Transportation 10  
Tom Dumas
- Dept. of Transportation 11  
Bill Fidge
- Dept. of Transportation 12  
Bob Joseph
- Housing & Community Development  
Cathy Crowell
- Caltrans - Division of Aeronautics  
Sandy Howard
- California Highway Patrol  
L. Julie Page
- Dept. of Transportation  
Ron Helgeson
- Dept. of General Services  
Robert Sheppy
- Air Resources Board
- Airport Projects  
Jin Lemar
- Transportation Projects  
Kurt Karpeno
- Industrial Projects  
Mica Tolstrup
- California Integrated Waste Management Board  
Sue O'Leary
- State Water Resources Control Board  
Diane Edwards

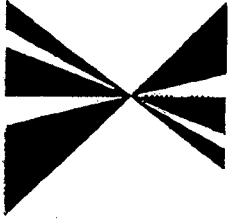
Dept. of Transportation

- Dept. of Transportation 1  
Mike Egan
- Dept. of Transportation 2  
Don Anderson
- Dept. of Transportation 3  
Jeff Pulverman
- Dept. of Transportation 4  
Jean Finney
- Dept. of Transportation 5  
David Mumay
- Dept. of Transportation 6  
Miro Blimbaum
- Dept. of Transportation 7  
Stephen J. Buewell
- Dept. of Transportation 8  
Linda Giffms.
- Dept. of Transportation 9  
Katy Wallon

State Water Resources Control Board

- State Water Resources Control Board  
Greg Frenz
- State Water Resources Control Board  
Mike Falkenstein
- Dept. of Toxic Substances Control  
CEQA Tracking Center
- Regional Water Quality Control Board (RWQCB)
- RWQCB 1  
Cathleen Hudson
- RWQCB 2  
Environmental Document Coordinator
- RWQCB 3  
Central Coast Region (3)
- RWQCB 4  
Jonathan Bishop
- RWQCB 5S  
Central Valley Region (5)
- RWQCB 5F  
Central Valley Region (5)
- RWQCB 5R  
Central Valley Region (5)
- RWQCB 6  
Lahontan Region (6)
- RWQCB 6V  
Lahontan Region (6)
- RWQCB 7  
Colorado River Basin Region (7)
- RWQCB 8  
Santa Ana Region (8)
- RWQCB 9  
San Diego Region (9)

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

Main Office

818 West Seventh Street  
12th Floor  
Los Angeles, California  
90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

September 19, 2002

Ms. Maya Zaitzevsky  
Project Coordinator  
Department of City Planning  
200 N. Spring Street, Room 763  
Los Angeles, CA 90012

RE: SCAG Clearinghouse No. I 20020484 Canyon Hills Project

Dear Ms. Zaitzevsky:

Thank you for submitting the Canyon Hills Project to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Canyon Hills Project, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). The proposed project is not a residential development of more than 500 dwelling units. Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's September 1-15, 2002 Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP  
Senior Regional Planner  
Intergovernmental Review

Officers: President: Councilmember Hal Bernson, Los Angeles • First Vice: Franklin Mayer Prothro, Los Angeles • Second Vice President: Supervisor Charles Smith, Orange County • Immediate Past President: Supervisor Jon Mikels, San Bernardino County

Imperial County: Hank Kuiper, Imperial County • San Diego County: Shields, Brawley

Los Angeles County: Yvonne Braithwaite Burke, Los Angeles County • Zev Yaroslavsky, Los Angeles County • Melanie Andrews, Compton • Harry Abowit, San Gabriel • Bruce Bartow, Covington • George Bass, Bell • Hal Bernson, Los Angeles • Ken Berkwood, Lomita • Robert Brusch, Rosemead • Eric Daniels, Paramount • Ruth Galanter, Los Angeles • Eric Garcetti, Los Angeles • Wendy Reuel, Los Angeles • James Hahn, Los Angeles • Alice Hahn, Los Angeles • Nate Holden, Los Angeles • Sandra Jacobs, El Segundo • Tom Ullonge, Los Angeles • Bonnie Lowenthal, Long Beach • Lawrence Kirkley, Inglewood • Eddie McCarty, Downey • Cindy Mischowski, Los Angeles • Pam O'Connor, Santa Monica • Nick Scheco, Los Angeles • Alex Padilla, Los Angeles • A Perry, Los Angeles • Bettina Poon, Mira Mesa • Mark Ridley Thomas, Los Angeles • Ed Rojas, Los Angeles • Karen Rosenthal, Claremont • Dick Sanford, Arcata • Tom Sykes, Walnut • Paul Talbot, Sanford • Shirley Tyler, Irwindale • Dennis Hubbard, Calabasas • Jack Weiss, Los Angeles • Jo Yousefian, Glendale • Donna P. Zier, Los Angeles

Orange County: Charles Smith, Orange County • Bob Bates, Los Alamitos • Ralph Bauer, Huntington Beach • Art Brown, Buena Park • Lou Bone, Tustin • Elizabeth Cowan, Costa Mesa • Cathryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Alta Cole, La Palma • Shirley McCracken, Anaheim • A Perry, Brea • Tod Ridgeway, Newport Beach

Riverside County: Bob Buster, Riverside County • Dan Lovetridge, Riverside • Greg Peulis, Cathedral City • Ron Roberts, Temecula • Jan Rudman, Corona • Charles White, Moreno Valley

San Bernardino County: Jon Mikels, San Bernardino County • Bill Alexander, Barchinaramonga • Lee Ann Garris, Grand Terrace • Bob Jones, Victorville • Susan Lora, San Bernardino • Guy Orndt, Ontario • Debra Robertson, Redlands

San Diego County: Judy Mikels, Warner County • Eric Botcher, Santa Valley • Carl Macleaner, San Marcos • Paul Young, Fort Huachuca

Ventura County Transportation Commission: John Lowe, Hemet

Imperial County Transportation Commission: Bill Davis, San Diego



# South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • <http://www.aqmd.gov>

September 17, 2002

RECEIVED  
CITY OF LOS ANGELES

SEP 19 2002

ENVIRONMENTAL  
UNIT

Ms. Maya Zaitzevsky  
Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

Dear Ms. Zaitzevsky:

## **Pre-Draft Environmental Impact Report Request for Comments for the Canyon Hills Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The AQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR).

### **Air Quality Analysis**

The AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the AQMD's Subscription Services Department by calling (909) 396-3720.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be considered. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the evaluation. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

**Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, AQMD's Rule 403 - Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

**Data Sources**

AQMD rules and relevant air quality reports and data are available by calling the AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the AQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The AQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Dr. Charles Blankson, Transportation Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development and Area Sources

SS:CB:li

LAC020911-02L1  
Control Number

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, REGIONAL PLANNING  
IGR/CEQA BRANCH  
120 SO. SPRING ST.  
LOS ANGELES, CA 90012  
PHONE (213) 897-6536  
FAX (213) 897-1337



*Flex your power!  
Be energy efficient!*

Ms. Maya Zaitzevsky, Project Coordinator  
Office of Planning  
City of Los Angeles  
200 N. Spring St., Room 763  
Los Angeles, CA. 90012

IGR/CEQA# 020907NY  
Canyon Hills Project/280 Units

LA/210/14.17

September 6, 2002

Dear Ms. Zaitzevsky:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Canyon Hills Project in the City of Los Angeles.

Based on the information received, and to assist us in our efforts to completely evaluate and assess the impacts of this project on the State transportation system, a traffic study in advance of the DEIR should be prepared to analyze the following information:

Please reference the Department's **Traffic Impact Study Guideline** on the Internet at <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to state route 210.
2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.
3. Analysis of ADT, AM, and PM peak-hour volumes for both existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be



Ms. Zaitzevsky

September 6, 2002

specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.

4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include: existing + project + other projects + other growth.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
  - description of transportation infrastructure improvements
  - financial costs, funding sources and financing
  - sequence and scheduling considerations
  - implementation responsibilities, controls and monitoringAny mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.
6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The ratio should be estimated, of additional traffic due to the project, to that amount of increase in traffic for which real mitigation must be provided (see Traffic Impact Study Guidelines). We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-link travel forecast modeling might be used.

We look forward to reviewing the DEIR. We expect to receive a copy from the State Clearinghouse. However, to expedite the review process, you may send two copies in advance to the undersigned at the following address:

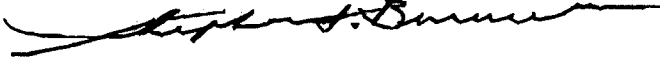
Stephen Buswell  
IGR/CEQA Branch Chief  
Caltrans District 07  
Regional Transportation Planning Office  
120 S. Spring St., Los Angeles, CA 90012

Ms. Zaitzevsky

September 6, 2002

If you have any questions regarding this response, please call the Project Engineer/Coordinator Mr. Yerjanian at (213) 897-6536 and refer to IGR/CEQA # 020907NY.

Sincerely,



STEPHEN J. BUSWELL  
IGR/CEQA Branch Chief  
Transportation Planning Office



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Ecological Services  
Carlsbad Fish and Wildlife Office  
2730 Loker Avenue West  
Carlsbad, California 92008



SEP 25 2002

In Reply Refer To:  
FWS-LA-3142.1

Maya Zaitzevsky  
Project Coordinator  
City of Los Angeles  
200 North Spring Street, Room 763  
Los Angeles, California 90012

RECEIVED  
CITY OF LOS ANGELES

SEP 27 2002

ENVIRONMENTAL  
UNIT

Re: Notice of Preparation of a Draft Environmental Impact Report for Canyon Hills Project,  
City of Los Angeles, Los Angeles County, California

Dear Ms. Zaitzevsky:

We have reviewed the above referenced Notice of Preparation (NOP) for a Draft Environmental Impact Report (EIR) received by our office on September 6, 2002. The project proposes to construct 280 single-family homes on approximately 246 acres of the 887-acre project site. Approximately 210 homes will be constructed on approximately 176 acres north of Interstate 210 (Development Area A). The remaining 70 homes will be constructed on approximately 70 acres south of Interstate 210 (Development Area B). Approximately 641 acres (72.3 percent) of the project site will be preserved as permanent open space.

We offer the following comments and recommendations regarding project-associated biological impacts based on our review of the NOP and our knowledge of declining habitat types and species within Los Angeles County. We provide these comments in keeping with our agency's mission to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." Specifically, we administer the Endangered Species Act of 1973, as amended. We also provide comments on public notices issued for a Federal permit or license affecting the Nation's waters pursuant to the Clean Water Act.

To facilitate the evaluation of the proposed project from the standpoint of fish and wildlife protection, we request that the Draft EIR contain the following specific information:

1. A description of the environment in the vicinity of the project from both a local and regional perspective, including an aerial photograph of the area with the project site outlined.
2. A complete discussion of the purpose and need for the project and each of its alternatives.

3. A complete description of the proposed project, including the limits of development, grading, and fuel modification zones.
4. Quantitative and qualitative assessments of the biological resources and habitat types that will be impacted by the proposed project and its alternatives. An assessment of direct, indirect, and cumulative project impacts to fish and wildlife associated habitats, particularly growth-accommodating effects of the project (e.g., increased population, increased development, increased traffic). All facets of the project (e.g., construction, implementation, operation, and maintenance) should be included in this assessment. Proposed developments in the surrounding area should be addressed in the analysis of cumulative impacts.

The assessments should include a list of Federal candidate, proposed, or listed species; State-listed species; and locally sensitive species that are on or near the project site, including a detailed discussion of these species and information pertaining to their local status and distribution. We are particularly interested in any and all information and data pertaining to potential impacts to populations of federally listed species.

The analysis of impacts to biological resources and habitat types should include detailed maps and tables summarizing specific acreages and locations of all habitat types, as well as the number and distribution of all Federal candidate, proposed, or listed species; State-listed species; and locally sensitive species, on or near the project site that may be affected by the proposed project or project alternatives.

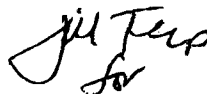
5. A detailed discussion of measures to be taken to avoid, minimize, and offset impacts to biological resources.
6. A detailed analysis of impacts of the proposed project on the movement of wildlife and measures proposed to avoid, minimize, and offset impacts to wildlife movement.
7. An assessment of potential impacts to wetlands and jurisdictional waters of the United States. Section 404 of the Clean Water Act prohibits the unauthorized discharge of dredged or fill material into such waters, including wetlands. This section also provides that the U.S. Army Corps of Engineers (Corps) may issue permits for discharges of dredged or fill material into jurisdictional waters and wetlands. Potential areas of Corps jurisdiction should be evaluated and wetlands should be delineated using the methodology set forth in the Corps' Wetland Delineation Manual (Environmental Laboratory 1987). The Draft EIR should disclose all impacts to jurisdictional waters and wetlands, and proposed measures to be taken to avoid and minimize impacts, and mitigate unavoidable impacts.

Maya Zaitzevsky (FWS-LA-3142.1)

3

We appreciate the opportunity to comment on the referenced NOP for potential impacts on sensitive and endangered species, wildlife and wetlands. Should you have any questions pertaining to these comments, please contact Kerri Davis of my staff at (760) 431-9440.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen A. Evans".

Karen A. Evans  
Assistant Field Supervisor

cc: Brad Henderson CDFG

## NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364  
 SACRAMENTO, CA 95814  
 (916) 653-4082  
 (916) 657-5390 - Fax



September 27, 2002

RECEIVED  
 CITY OF LOS ANGELES

SEP 30 2002

ENVIRONMENTAL  
 UNIT

Maya Zaitzevsky  
 Los Angeles City Planning Department  
 200 North Spring Street, Room 763  
 Los Angeles, CA 90012

RE: SCH# 2002091018 - Canyon Hills Project, City and County of Los Angeles

Dear Ms. Zaitzevsky:

The Native American Heritage Commission has reviewed the Notice of Preparation (NOP) regarding the above project. To adequately assess and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

- ✓ Contact the appropriate Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measurements should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check.
  - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures.
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5 (e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Rob Wood  
 Environmental Specialist III  
 (916) 653-4040

CC: State Clearinghouse



**DEPARTMENT OF FISH AND GAME**

http://www.dfg.ca.gov  
4949 Viewridge Avenue  
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CITY OF LOS ANGELES

SEP 27 2002

ENVIRONMENTAL  
UNIT

September 25, 2002

Ms. Maya Zaitzevsky  
Los Angeles City Planning Department  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

Dear Ms. Zaitzevsky:

**Notice of Preparation of a Draft Environmental Impact Report  
for Canyon Hills Residential Development  
SCH # 2002091018, Los Angeles County**

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. The proposed project involves the development of approximately 280 single family residences on 246 acres of a 687 acre undeveloped site located north and south of Interstate 210 near Verdugo Crestline Drive and La Tuna Canyon Road within the Verdugo Mountains in the City of Los Angeles.

To enable Department staff to adequately review and comment on the proposed project we recommend the following information, where applicable, be included in the Draft Environmental Impact Report:

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.
  - a. A thorough recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (Attachment 1).
  - b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.

- c. **Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380).**
  - d. **The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.**
2. **A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.**
- a. **CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.**
  - b. **Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic and outdoor artificial lighting.**
  - c. **A cumulative effects analysis should be developed as described under CEQA Guidelines, § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.**
  - d. **Impacts to migratory wildlife affected by the project should be fully evaluated. This can include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code**



prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.

- e. Impacts to all habitats from City or County required Fuel Modification Zones.(FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.
  - f. Proposed project activities (including disturbances to vegetation) should take place outside of the breeding bird season (February 1-September 15) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If project activities cannot avoid the breeding bird season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by a biological monitor (the Department recommends a minimum 500 foot buffer for all active raptor nests).
3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub, coastal sage scrub, native woodlands, etc. should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
- a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed.
  - b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).
  - c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless

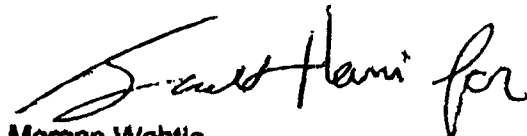
Ms. Maya Zaitzevsky  
September 25, 2002  
Page 4 of 5

the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:

- a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
  - b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
5. The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations.
- a. The Department requires a streambed agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a stream bed alteration agreement may be a project that is subject to CEQA. To facilitate our issuance of the agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

The Department suggests a pre-project or early consultation planning meeting for all projects. To make an appointment, please call Scott Harris, Wildlife Biologist, at (818) 360-8140. Thank you for this opportunity to provide comment.

Sincerely,



Morgan Wehtje  
Environmental Scientist IV

**Ms. Maya Zaitzevsky**  
**September 25, 2002**  
**Page 5 of 5**

**Attachments**

**cc: Mr. Scott Harris**  
**Ms. Betty Courtney**  
**Department of Fish & Game**

**Mr. Scott Morgan**  
**State Clearinghouse**

## ATTACHMENT 1

State of California  
THE RESOURCES AGENCY  
Department of Fish and Game  
May 4, 1984

### GUIDELINES FOR ASSESSING THE EFFECTS OF PROPOSED DEVELOPMENTS ON RARE AND ENDANGERED PLANTS AND PLANT COMMUNITIES

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted and what information should be contained in the survey report.

Botanical surveys that are conducted to determine the environmental effects of a proposed development should be directed to all rare and endangered plants and plant communities. Rare and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare and/or endangered under the following definitions.

A species, subspecies or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition or disease. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare plant communities are those communities that are of highly limited distribution. These communities may or may not contain rare or endangered species. The most current version of the California Natural Diversity Data Base's Outline of Terrestrial Communities in California may be used as a guide to the names of communities.

It is appropriate to conduct a botanical field survey to determine if, or the extent that, rare plants will be affected by a proposed project when:

- a. Based on an initial biological assessment, it appears that the project may damage potential rare plant habitat;
- b. Rare plants have historically been identified on the project site, but adequate information of impact assessment is lacking; or
- c. No initial biological assessment has been conducted and it is unknown whether or not rare plants or their habitat exist on the site.

Botanical consultants should be selected on the basis of possession of the following qualifications (in order of importance):

- a. Experience as a botanical field investigator with experience in field sampling design and field methods;
- b. Taxonomic experience and a knowledge of plant ecology;
- c. Familiarity with the plants of the area, including rare species; and
- d. Familiarity with the appropriate state and federal statutes related to rare plants and plant collecting.

Field surveys should be conducted in a manner that will locate any rare or endangered species that may be present. Specifically, rare or endangered plant surveys should be:

- a. Conducted at the proper time of year when rare or endangered species are both "evident" and identifiable. Field surveys should be scheduled (1) to coincide with known flowering periods, and/or (2) during periods of

phenological development that are necessary to identify the plant species of concern.

- b. Floristic in nature. "Predictive surveys" (which predict the occurrence of rare species based on the occurrence of habitat or other physical features rather than actual field inspection) should be reserved for ecological studies, not for impact assessment. Every species noted in the field should be identified to the extent necessary to determine whether it is rare or endangered.
  - c. Conducted in a manner that is consistent with conservation ethics. Collection of rare or suspected rare species (voucher specimens) should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit regulations. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.
  - d. Conducted using systematic field techniques in all habitats of the site to ensure a reasonably thorough coverage of potential impact areas.
  - e. Well documented. When a rare or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form should be completed and submitted to the Natural Diversity Data Base.
5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations, EIR's and EIS's, should contain the following information:
- a. Project description, including a detailed map of the project location and study area.
  - b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
  - c. Detailed description of survey methodology.
  - d. Dates of field surveys.
  - e. Results of survey (including detailed maps).
  - f. An assessment of potential impacts.
  - g. Discussion of the importance of rare plant populations with consideration of nearby populations and total species distribution.
  - h. Recommended mitigation measures to reduce or avoid impacts.
  - i. List of all species identified.
  - j. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
  - k. Name of field investigator(s).
  - l. References cited, persons contacted, herbaria visited, and disposition of voucher specimens.

ATTACHMENT 2

Sensitivity of Top Priority Rare Natural  
Communities in Southern California\*

\*Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

- 1.- Less than 6 known locations and/or on less than 2,000 acres of habitat remaining
- 2.- Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining
- 3.- Occurs in 21-100 known locations and/or 10,000-50,000 acres of habitat remaining

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

- S1.1 = very threatened  
S2.2 = threatened  
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

<u>Rank</u>	<u>Community Name</u>
S1.1	Mojave Riparian Forest
	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Mesquite Bosque
	Maritime Succulent Scrub
	Elephant Tree Woodland
	Riversidean Alluvial Fan Sage Scrub
	Crucifixion Thorn Woodland
	Southern Maritime Chaparral
	Allthorn Woodland
	Valley Needlegrass Grassland
	Arizonan Woodland
	Great Basin Grassland
	Southern California Walnut Forest
	Mojave Desert Grassland
	Mainland Cherry Forest
	Pebble Plains
	Southern Bishop Pine Forest
	Southern Sedge Bog
	Torrey Pine Forest
	Cismontane Alkali Marsh
	Desert Mountain White Fir Forest

Sensitivity Rankings (Cont.)

Community Name

- S1.2 Southern Foredunes  
Mono Pumice Flat  
Southern Interior Basalt Fl. Vernal Pool
- S2.1 Venturan Coastal Sage Scrub Coastal and Valley Freshwater Marsh  
Diegan Coastal Sage Scrub S. Arroya Willow Riparian Forest  
Riversidean Upland Coastal Sage Southern Willow Scrub  
Scrub  
Riversidean Desert Sage Scrub Modoc-G. Bas. Cottonwood Willow Rip.  
Sagebrush Steppe Modoc-Great Basin Riparian Scrub  
Desert Sink Scrub Mojave Desert Wash Scrub  
Mafic Southern Mixed Chaparral Engelmann Oak Woodland  
San Diego Mesa Hardpan Vernal P. Open Engelmann Oak Woodland  
San Diego Mesa Claypan Vernal P. Closed Engelmann Oak Woodland  
Alkali Meadow Island Oak Woodland  
Southern Coastal Salt Marsh California Walnut Woodland  
Coastal Brackish Marsh Island Ironwood Forest  
Transmontane Alkali Marsh Island Cherry Forest  
S. Interior Cypress Forest  
Bigcone Spruce-Canyon Oak Forest
- S2.2 Active Coastal Dunes  
Active Desert Dunes  
Stab. and Part. Stab. Desert Dunes  
Stab. and Part. Stab. Desert Sandfield  
Mojave Mixed Steppe  
Transmontane Freshwater Marsh  
Coulter Pine Forest  
S. California Fellfield  
White Mountains Fellfield
- S2.3 Bristlecone Pine Forest  
Limber Pine Forest

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

September 19, 2002

TO: City Planning  
Attn: Maya E. Zaitzevsky

FROM: Fire Department

SUBJECT: CANYON HILLS PROJECT CASE #ENV-2002-2481-EIR

RECEIVED  
CITY OF LOS ANGELES

OCT 02 2002

ENVIRONMENTAL  
UNIT

**PROJECT LOCATION**

La Tuna Canyon Road – north and south of 210 Freeway.

**PROJECT DESCRIPTION**

280 single family dwellings on 246 acres and 641 acres open space.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use.

The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 2,000 G.P.M. from 2 fire hydrants flowing simultaneously.

B. Response Distance

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:



Fire Station No. 74  
7777 Foothill Boulevard  
Tujunga, CA 91042  
Task Force Truck and Engine Company  
Paramedic Rescue Ambulance  
Staff – 12  
Miles – 2.8

Fire Station No. 24  
9411 Wentworth Street  
Sunland, CA 91040  
Single Engine Company  
Staff – 4  
Miles – 3.4

Fire Station No. 77  
8943 Glenoaks Boulevard  
Sun Valley, CA 91352  
Paramedic Engine Company  
Staff – 4  
Miles – 4.5

The above distances were computed to La Tuna and 210 Freeway.

Based on these criteria (response distance from existing fire stations), fire protection would be considered inadequate.

C. **Firefighting Access, Apparatus, and Personnel.**

Improvements to the water system in this area may be required to provide 2,000 G.P.M. fire-flow. The cost of improving the water system may be charged to the developer. For more detailed information regarding water main improvements, the developer shall contact the Water Services Section of the Department of Water and Power.

Based on a required fire-flow of 2,000 G.P.M., the first-due Engine Company should be within 1.5 miles, the first-due Truck Company within 2 miles.

Environmental Impact

Project implementation will increase the need for fire protection and emergency medical services in this area.

At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required.

**Adverse Effects:** Project implementation will increase the need for fire protection and emergency medical services in this area.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.

All landscaping shall use fire-resistant plants and materials. A list of such plants is available from the Fire Department.

All homes shall have noncombustible roofs. (Non-wood)

The brush in the area adjacent to the proposed development shall be cleared or thinned periodically by the homeowner's Association under supervision to the Los Angeles City Fire Department in order to reduce the risk of brush fires spreading to the homes.

In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems will be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07.

Submit plot plans indicating access road and turning area for Fire Department approval.

Construction of public or private roadway in the proposed development shall not exceed 15 percent in grade.

Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.

Standard cut-corners will be used on all turns.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

At present, there are no immediate plans to increase Fire Department staffing or resources in those areas, which will serve the proposed project.

All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

The entrance or exit of all ground apartment units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Private roadways for general access use shall have a minimum width of 20 feet.

Where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Adequate public and private fire hydrants shall be required.

Definitive plans and specifications shall be submitted to this Department and requirements for necessary permits satisfied prior to commencement of any portion of this project.

Maya Zaitzevsky  
September 19, 2002  
Page 5

## CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact Inspector Michael Theule of the Construction Services Unit at (213) 482-6543.

**WILLIAM R. BAMATTRE**  
Fire Chief



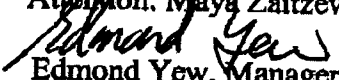
Alfred B. Hernandez, Assistant Fire Marshal  
Bureau of Fire Prevention and Public Safety

ABH:MT:gm  
c:Cyn Hills Proj

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

Date: October 7, 2002

To: Mr. Con Howe, Director  
Department of City Planning  
City Hall, Suite 763  
Attention: Maya Zaitzevsky

From:   
Edmond Yew, Manager  
Land Development Group  
Bureau of Engineering  
201 N. Figueroa Street, Suite 200

Subject: Comments on Notice of Preparation (NOP) of an Environmental Impact Report for the "Canyon Hills Project", Case No.: ENV-2002-2448-EIR

The staff of the Bureau of Engineering has reviewed your referral dated September 6, 2002, and has the following comments for inclusion into the Draft Environmental Impact Report (DEIR):

**STREET:**

The proposed streets both onsite and offsite should be designed and improved according to the Bureau of Engineering' Standard Plan Dimensions S-470-0. The project site plan shows a secondary emergency access road. The DIER should thoroughly analyze the alignment of this access road and the existing streets beyond this access road to make sure the streets can handle the emergency traffic in conjunction with the development. If the existing streets are to be upgraded in conjunction with an emergency access, the DEIR should address the impacts associated with the streets.

The project site plan also indicates street connections through the Southern California Edison (SCE) transmission line area will be required. The DEIR should address the process of SCE granting public street easement through the transmission line. Any potential impacts should be addressed in the DEIR.

**SANITARY SEWERS**

A comprehensive analysis of the wastewater flows for the entire proposed project site, including capacity of the existing and future sanitary sewers in a cumulative context and in conjunction with the proposed development should be discussed in the DEIR.

**DRAINAGE**

The DEIR should include a hydraulic/ hydrology study and to address the drainage discharge from the development site, together with any necessary drainage facilities to mitigate the additional storm runoff in conjunction with the development of the site. If

debris basins are required, the DEIR should include the location of the basins and the responsibility of maintaining the basins.

Should you have any questions regarding the above-mentioned comments, please contact Ray Saidi of my staff at (213) 977-7097.

grs

**DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**

2130 Windsor Avenue  
Altadena, CA 91001-5963  
626.296.8100  
(800) 735-2929 (TT/TDD)  
(800) 735-2922 (Voice)



October 4, 2002

File No.: 575.10929.5932

Maya Zaitzevsky  
Los Angeles City Planning Department  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

Dear Ms. Zaitzevsky:

We have received from the State Clearinghouse (SCH# 2002091018) your Notice of Preparation (NOP) for the Canyon Hills Project draft Environmental Impact Report (EIR). In reviewing the NOP, we have the following traffic safety and congestion concerns that should be addressed before the beginning of work on this project.

Improved Off-Ramp Design – The westbound off-ramp to La Tuna Canyon Road will need to be redesigned to accommodate the increased traffic flow as a result of the project. There is a sharp curvature on the off-ramp, which has not been a significant problem because of the lower volume of traffic. However, the Canyon Hills Project's increase in the number of vehicles using the interchange and will generate more collisions due to its current design. Re-aligning the off-ramp to eliminate the curve's current radius and align it with a main access street into the project, coupled with a signalized intersection at La Tuna Canyon Road, will expedite traffic safely off the freeway and into the project.

Installation of Traffic Signals – Due to the increased volume of traffic using the La Tuna Canyon Road interchange as a result of this project, traffic signals need to be installed at the freeway ramps north and south of the Foothill Freeway (I-210).

Improved On-Ramps to Support HOV – To facilitate the state's High Occupancy Vehicle program to reduce traffic congestion, the on-ramps will have to be widened to accommodate HOV lanes and metering. This change is necessary because of the anticipated increase in the traffic flow from the Canyon Hills Project.

Underground Utility Poles – Any utility poles that are to be installed near the interchanges of La Tuna Canyon Road and Sunland Boulevard need to be placed underground to reduce the chances of vehicles colliding with fixed objects. Collisions with fixed objects increase the severity of injuries.



Maya Zaitzevsky  
Page 2  
October 4, 2002

Installation of Sound Walls -- Past experience has shown that with large housing developments such as this one, which is also situated close to a freeway, there will be a need for the developer to install sound walls to protect residents from freeway noise.

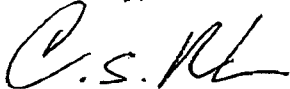
Bus Stop Location -- To prevent traffic congestion and potential pedestrian collisions, a bus stop area should be designed so that the bus can leave the freeway proper and the roadway portion of La Tuna Canyon Road and Sunland Boulevard to pick-up/drop-off passengers. It is reasonable to assume that many homeowners will use public transportation in lieu of private vehicles. Additionally, low-income domestic workers will need access to safe transportation services.

Sidewalks -- South of the interchange of La Tuna Canyon Road are hiking trails that are frequented by hikers. Obviously, the residents of the development will also utilize these trails. Adequate and safe sidewalks need to be installed around the interchanges to allow pedestrian travel to the hiking trails without unnecessary conflict with vehicles.

Park and Ride Lot -- In support of the state's congestion relief efforts, a suitable Park and Ride Lot should be designated near the Canyon Hills Project and the freeway.

If you require additional information, please feel free to contact Lieutenant Alan K. Henderson at 626.296.8100.

Sincerely,



C. S. KLEIN, Captain  
Commander  
Altadena Area

cc: OPR, State Clearinghouse  
CHP Headquarters, Special Projects Section



**CITY OF LOS ANGELES**  
DEPARTMENTAL CORRESPONDENCE

**DATE:** October 7, 2002

**TO:** Maya Zaitzevsky  
Environmental Review Section  
Department of City Planning  
Mail Stop 395

**FROM:** Marjorie Matthews, Division Head  
Planning and Construction



**SUBJECT: PRE-DRAFT ENVIRONMENTAL IMPACT REPORT - PROPOSED CANYON HILLS PROJECT**

The following information has been prepared in response to your request for comments relative to the Pre-Draft Environmental Impact Report (EIR), Proposed Canyon Hills Project.

The project is located in a primarily undeveloped area that spans the Foothill Freeway (I-210). There are recreational facilities and parks in the area including:

- Haines Canyon Park (35 acres) (undeveloped)
- Howard Finn Park (2.0 acres), Fehlhaber-Houk Park (1.2 acres), and Little Landers Park (1.16 acres) (small parks)
- Verdugo Hills Pool (0.69 acres)
- McGroarty Park and Recreation Center (16.16 acres) (Cultural Arts facility)
- Sunland Park and Recreation Center (16.45 acres)

However, several of these sites are not readily accessible from the project site, with major boulevards and distance issues.

The ratio of neighborhood/community parks to 1,000 people in the area is below the City standard of 4 acres per 1,000 people. In addition, the project will add approximately 1,100 more people to the area that will further impact the existing facilities. The recreational needs of the future residents of the project will not be met and will need to be provided to mitigate the lack of services. The majority of the parks in the area have only outdoor features and small or no facilities (e.g., undeveloped and small parks). They do not provide recreational facilities usually found in neighborhood/community parks, which include features such as sportsfields, baseball diamonds, basketball courts, gymnasiums, and community rooms. In addition, Verdugo Hills Pool and McGroarty Park and Recreation Center, a Cultural Arts Center, have specific facilities that do not address many of the recreational needs of the community. Sunland Park and Recreation Center is the only facility near the area that provides active recreational opportunities for children, youth, and their families and is currently heavily used. Further, this site is separated from the project area by Foothill Boulevard.

Although the project proposes an equestrian park and other private recreational facilities within the development, these facilities will not provide the types of recreational opportunities needed by the residents of the area, especially with the increase of new residents, whose equestrian needs are not

Maya Zaitzevsky

October 7, 2002

Page Two

related to the project. Large areas for sportsfields, baseball diamonds, basketball courts, gymnasiums/community centers are facilities found at neighborhood/community recreation centers and provide for the needs of the community, especially youth and families.

Neighborhood parks are 5 acres, ideal 10 acres, and have a service radius of approximately one-half mile and located so that the users are not required to cross a major arterial street or highway/freeway when walking to the site. Community parks are 15 acres, ideal 20 acres, and easily accessible to the area served. Access for the new residents of the project to existing parks and recreational facilities is difficult, especially for those that would live on the south side of the Foothill Freeway. The children and youth will require an adult to drive them to participate in programs and use the facilities of neighborhood parks outside of the project area, if future recreation and parks facilities are not included in the project, including areas for sports field, baseball, etc.

In subdivisions containing more than 50 units, land may be required to be dedicated for recreation and parks purposes, in lieu of fees (per L.A. Municipal Code 17.12). There is a serious lack of neighborhood/community park facilities for the future residents of the project. The Department has undeveloped property in the area and requires property that does not require extensive grading, landscaping/erosion measures or brush clearance maintenance. The Department prefers and the neighborhood needs, a neighborhood/community park to be developed that is easily accessible to those in the project, and as well as for the current population that lacks sufficient facilities and large active recreational facilities (e.g., sports fields, ball diamonds, basketball courts, gymnasiums).

The Department is interested in the Canyon Hills Project Proposal, however, there have not been any discussions or formal meetings relative to the *Public Services, Recreation* portion of the Pre-Draft EIR or relative to any proposed recreation and park improvements or facilities within or near the project. We welcome the opportunity to discuss these key issues as they relate to recreation and park opportunities and this proposal.

Thank your for the opportunity to review these documents.

If you have any questions or comments regarding this information, please contact, Camille Didier, of my staff, at (213) 485-8168.

MM/CD:asl

cc: Kevin Regan, Superintendent, Valley Region  
Tony Coroalles, Assistant General Manager, Regional Operations  
Robert D. Fawcett, Project Manager II  
Reading File



Los Angeles County  
Department of Regional Planning

*Planning for the Challenges Ahead*



October 7, 2002

James E. Hartl, AICP  
Director of Planning

Maya Zaitzevsky  
Project Coordinator, Environmental Review Section  
City of Los Angeles Planning Department  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

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OCT 07 2002

ENVIRONMENTAL  
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**SUBJECT: Notice of Preparation Draft Environmental Impact Report  
Canyon Hills Project**

Dear Ms. Zaitzevsky:

Thank you for providing this Department the opportunity to comment on the content of the Draft Environmental Impact Report (DEIR) for the proposed Canyon Hills project. The Canyon Hills project is located both north and south of the 210 Freeway, north of La Tuna Canyon Road.

The proposed project site is located within the Los Angeles County designated Verdugo Mountains Significant Ecological Area (SEA No. 40; see enclosed description). This large mountain range contains one of the best stands of Ceanothus-dominated chaparral in Los Angeles County outside of the Angeles National Forest. The range provides core habitat for a variety of wildlife species and the project site contains one of the last wildlife corridors linking the Verdugo Mountains with the San Gabriel Mountains. The DEIR must completely analyze the significant impacts that this project will cause on biological resources, including wildlife movement.

The stretch of the 210 Freeway that runs through the proposed project site is one of the last undeveloped sections of hillside along this urban freeway. The proposed project design would permanently change the character of this visual corridor and significantly impact the aesthetic quality of this respite from urban sprawl.

The alternatives discussion to the proposed project design should include a design with all of the project development, include the equestrian park, confined north of the 210 Freeway. Such an alternative design will essentially eliminate the potentially significant impacts to the critical wildlife corridor and greatly minimize the potential visual impacts that the proposed design would generate.

Since the project is located within the Verdugo Mountains SEA, Los Angeles City should consider requesting that Los Angeles County's Significant Ecological Areas Technical Advisory Committee (SEATAC) review the biological resources assessment and the project design for compatibility with the SEA resources.

The Department of Regional Planning of Los Angeles County appreciates this opportunity to provide input into the CEQA environmental review process for this proposed project. If you have any questions, please contact Daryl Koutnik at (213) 974-6461, Monday through Thursday between 7:30 a.m. and 6:00 p.m. Our offices are closed on Fridays.

Very truly yours,

DEPARTMENT OF REGIONAL PLANNING

James E. Hartl, AICP

Director of Planning

A handwritten signature in black ink that reads "Daryl Koutnik". The signature is written in a cursive style with a large, stylized "D" and "K".

Daryl Koutnik  
Senior Biologist  
Impact Analysis

JEH:DLK:dlk

c: Chief Administrative Office

## **Significant Ecological Area #40 Verdugo Mountains**

**Resource Description:** The Verdugo Mountains are an extensive, relatively undisturbed island of natural vegetation in an urbanized metropolitan area. Their geographic location makes them important for scientific study, genetic interchange between otherwise isolated populations, and recreation to urban residents.

Chaparral and coastal sage scrub cover the hillsides of the mountains, with riparian vegetation, including California bay (*Umbellularia californica*), sycamore (*Platanus racemosa*), ferns, and tiger lilies, found in many of the stream drainages. These plant communities provide habitat essential to the diverse and abundant fauna found in the area. The mountains are also home to the northernmost population of *Xylococcus bicolor*.

The area serves as an island refuge, providing what remains of a link between plant and animal populations found in the Santa Monica and San Gabriel Mountains. Genetic interchange, by way of this linkage is important in perpetuating the genetic variability in isolated populations, and consequently the maintenance of healthy ecosystems.

The proximity of the mountains to urban areas provides an excellent opportunity to study the interaction between wild animal populations and humans. The area has already been used for studies concerned with public health.

**Status:** In general, only dirt roads, firebreaks, transmission lines, and structures such as isolated houses, radio towers, and water tanks have lightly impacted the area. A paved road through La Tuna Canyon traverses the area. The Foothill Freeway (Interstate 210) crosses the northern edge. However, present human use of the area has been low and has not significantly affected the natural resources found here.

**Information Source(s):** Survey/Interview, ERC/UCLA.

**Nature of Information:** The scientific, recreational, and ecological values of the area have long been recognized and used by professional and non-professional biologists. Considerable information exists on the area.

**Buffer Zone Requirement:** None, the area included should be sufficient to preserve the value of the mountains.

**Compatible Uses:** Medium intensity recreational uses are compatible with the resources in the area.

**Quadrangle(s):** Burbank, Sunland, Pasadena  
**Class 7**



**AHEAD WITH HORSES INC.**

9311 Del Arroyo Drive • Sun Valley, CA 91352 • (818) 767-6373 • fax: (818) 767-6231

October 7, 2002

Maya E. Zaitzevsky  
Project Coordinator  
Environmental Review Section  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

EAF NO: ENV-2002-2481-EIR  
PROJECT NAME: Canyon Hills Project

Dear Ms. Zaitzevsky:

This project cannot pretend that the negative environmental impacts can be mitigated and is a breach of faith and trust in the City's planning agreements with area residents.

Specifically the following are of critical concern:

West Nile Virus. The last two proposed developments included a "pond" or catch basin for water control. These are prime breeding places for mosquitoes and spraying chemicals is equally hazardous to health.

Grading, paving, erosion, flooding. Our properties are drastically affected by flooding as a blue-line stream becomes a river in heavy rain (see enclosed photocopy).

Wildlife corridors. We use our properties as a valuable educational resource which benefits thousands of disabled and disadvantaged children each year.

Light and noise pollution. We want to keep seeing the stars and bought here because it was quiet with minimal traffic and other noise. It is unfair to cheat us out of what we purchased.

Dust and smog cannot be denied.

HEAT. Already a noticeable shift to wet heat instead of former dry heat and the nights are no longer always cool. Paving a comparable area to the proposed in Atlanta for the Olympics raised the temperature 15 degrees.

Fire danger and no water. Perhaps the 8 drought years are forgotten when we could not wash our horses or water plants or flush toilets -- how has this changed? The aquifers that made Sun Valley grow are under our properties.



**AHEAD WITH HORSES INC.**

9311 Del Arroyo Drive • Sun Valley, CA 91352 • (818) 767-6373 • fax: (818) 767-6231

We are so respectful that we do not use chemicals that would find their way into them -- no toxic substances. The proposed emergency fire road is just another destroyer of the hills and more paving and fire danger.

Population, traffic and housing density. Rats die when crowded -- we bought here for space and low density .

Crime, graffiti, insurance costs. All increased

Power outages. There are brown outs now. How will this change. We do not want street lights.

What about the Kangaroo Rats who live here who are endangered?

AESTHETICS. One of the last beautiful unpaved-over areas will be lost to future generations without any chance for restoration or replacement.

PLEASE FIND A WAY TO SAVE THIS AREA AS IT IS.

Sincerely,

Elizabeth Helms for  
Ahead With Horses Inc (40 acres) 9311 Del Arroyo Drive, Sun Valley 91352  
Elizabeth Helms (44 acres) 9311 Del Arroyo Drive, Sun Valley 91352  
Jennifer Dahlquist (3 acres) 9250 Del Arroyo Drive, Sun Valley 91352



AHEAD WITH HORSES INC. • 9311 Del Arroyo Drive • Sun Valley, Ca. 91352 • (818) 767-6373

April 1, 1999

Dear Most Valuable Friend(s):

PLEASE help us with a donation if you cannot attend . . . El Nino hit us **very hard** and we are still struggling to overcome the damage and losses.

Medical technology is keeping more and more children with multiple and severe disabilities alive. These are the ones AHEAD WITH HORSES specializes in helping -- no one is turned away. This is where the money goes.

Please consider becoming a T-Shirt Advertiser (\$750.00), Special Day Sponsor (\$250.00, special events, field-trips, etc.) or Contributor (any amount, really needed and appreciated).

\$5 will purchase a small model horse for a sick or needy child or an AWH coloring book we can send to a child in the hospital, or to one with AIDS, or to a school class to be copied, to a homeless shelter, housing project, or to other disadvantaged kids.

Gratefully, the money from last year's event enabled us to face the consequences of the El Nino storms which damaged our roads, ramps, rings, power and office equipment. As we have no tractor, we shoveled in the road, ramps, and rings **THREE TIMES BY HAND**--a discouraging and daunting effort--but, somehow, we kept going and **DID NOT FAIL THE CHILDREN!!!**

PLEASE find it in your heart to send a gift -- WE CAN NEVER THANK YOU ENOUGH!

Sincerely,

Liz Helms  
Director

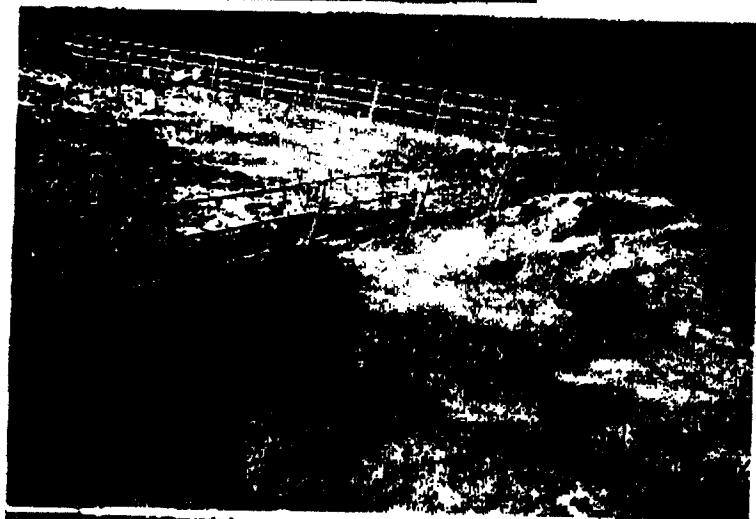
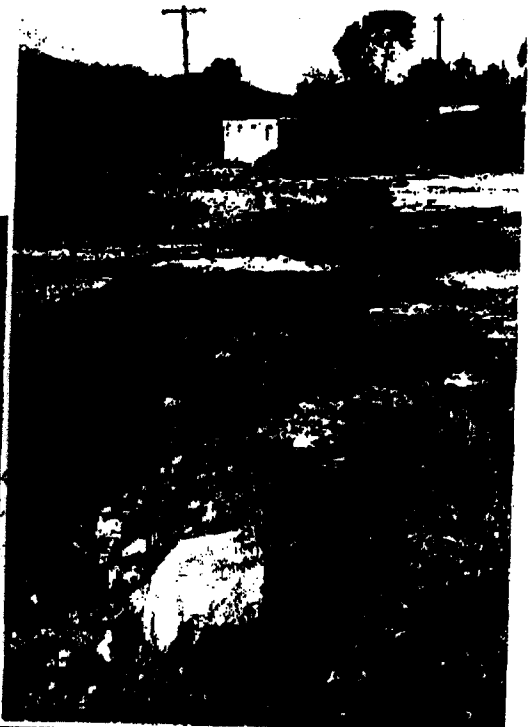
Pa. 20:7



**WE SHOVELED THIS IN THREE TIMES BY HAND!!!**

non-profit therapeutic/developmental riding for the handicapped





WE SHOVELED IN ALL THIS  
THREE TIMES BY HAND!!!

September 30, 2002

Maya E. Zaitzevsky  
Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

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Dear Ms. Zaitzevsky,

This letter is really a follow-up regarding the Public Scoping Meeting held on September 23, 2002 at the Sunland-Tujunga Municipal Building. We do thank all of you who attended the meeting and listened to our message about the proposed development of the Canyon Hills Project.

As we related at that meeting, we are unconditionally opposed to the construction of 280 residences in the La Tuna Canyon area. We are opposed to the construction of ANY residences in the mountain and canyon area near the 210 Freeway.

Some of our specific concerns were stated at the meeting but let us reiterate the major concerns we have regarding such a development.

We are opposed to the demolition of the mountains, hills and canyons in the region. This, in turn, will destroy vegetation that is necessary to prevent soil loss and flooding. This will also be a disaster for what animal life we have left now.

The increased traffic not only on the 210 Freeway but the traffic on many near-by streets: La Tuna Canyon Road, Sunland Boulevard, Foothill Boulevard and the many streets in La Crescenta, La Canada, Burbank, Montrose and Glendale.

The increased traffic will exacerbate the noise pollution and air pollution. This area is already at peak capacity for vehicles on the 210 Freeway and major access routes to that freeway. Try getting on the freeway at peak commuter times at the onramp at Sunland. The increased traffic is already a serious problem.

If and when, construction begins, the freeway and nearby roads will be veritable parking lots of commuter vehicles, normal trucking vehicles and the trucking needed for the construction.

We are concerned about the plans for entrance and egress for the Canyon Hills site in any kind of emergency. We saw a recent brush fire leap over the hills toward Tujunga. At best this area is difficult to reach. One can imagine the residents trying to get out and fire fighting equipment trying to get to this area. And the idea of a road along Crestline Drive with break-away gates is about as ludicrous as anyone can imagine. We have lived through several brush fires where we live on Day Street and we can tell you how difficult it is to reach a fire area when it is behind homes.

With the 280 homes in the proposed development one can assume that each family will have two (and more likely three) vehicles. With members of the family making at least two (and more likely) three or four trips per day to other parts of the area for work, going shopping, taking children to school; this will add to the increased traffic and pollution.

Which brings us to the question of schools. Just where will these elementary, middle and high school children attend school be they public or private schools?

This area of development is within the Los Angeles Unified School District. The nearest elementary school is in the La Tuna Canyon area, west of the development. Two other schools are located in Sunland with several in Tujunga. All are small schools, already overcrowded. The only nearby middle school is Mt. Gleason with the Verdugo Hills High School close by. ALL are not close enough for the students to walk to school. Thus it follows that all of the students must be driven to school, or receive bus transportation. High schoolers may also have their own transportation...adding to the over-use of the streets.

Another concern that we mentioned had to do with the proposed removal of oak trees in the Honolulu-Tujunga Canyon-La Tuna Canyon conjunction area. This supposedly has to do with the safety factor which would be solved by widening La Tuna Canyon Road. It doesn't take a rocket scientist to see the handwriting on the wall. This is preparation for the onslaught of construction traffic and the eventual traffic for the Canyon Hills Project. And if anyone thinks this will make drivers slow down, think again or check out the speeds of commuters on Day Street and Sherman Grove as they go to and from work. And this is a residential area with Sherman Grove leading to the 210 Freeway entrance.

The time-frame of construction is horrendous (2004-2009) and will be a period of misery for people who live in the area and those who use the 210 daily as well as the near-by streets. The developers and construction workers for all purposes do not live in the area, will go home at night to peace and quiet. How nice for them...especially the developers who live in far-off Texas. Put this project somewhere in Texas where they have already put in a development. Leave our hills and canyons alone.

And the insistence that La Tuna Canyon Road will be the ONLY access road needed for the 280 homes, is blowing smoke. Wait until the complaints start about how long it takes to get out of the area, wait for signals, on-coming traffic to and from the 210 Freeway, delivery trucks, service trucks and equipment going in and out on a daily basis and see how long it takes for someone to get the idea of cutting another road through those hills.

Many of the people in attendance on September 23 expressed their concerns in a far more articulate fashion than this letter. Many of those people live much closer to the development area than we do. We share their fears, concerns and, yes, well-concealed anger. We thought everyone was exceptionally civil about something that will deeply change their lives. Is this just another lesson in futility? Is this Canyon Hills Development already "on the books" as a fore-gone conclusion? Will those making the final decision really think about the future and good of this truly beautiful area and the people who live here? We hope so. Sunland has been home to us since about 1946. We'd like to see some of the great qualities retained.

Sincerely yours,

*Andrew M. Al Porter*

September 30, 2002

9142 Wheatland Av.  
Sun Valley, CA 91352

To Whom It May Concern:

Greetings!

As my address displays, I am a resident within the La Tuna Canyon area.

I want to comment on the fact that I am not in approval of allowing the North East Valley, involving La Tuna Canyon, Shadow Hills, Sunland, Tujunga, and Lake View Terrace, to be rezoned from its present rural of A1 status.

Residents and homeowners have chosen to make this their living space in life for its rural setting. Animals of various kinds are allowed to be raised in this setting. The unobstructed mountains bring beauty to all of the North East Valley.

To the land developers who covets to earn 100,000's of dollars or even millions at the expense of a quiet rural setting is not something someone should give acclaim to take place. Even if it brings taxes and volumes of more people into the area, this can never compensate for what would be relinquished at the hands of rezoning.

We should take pride in what we have – not in what we are challenged to give up.

My vote is "NO" for rezoning the stated areas.

Thank you.

Sincerely,

  
David Martinez

Maria Mejia  
9951 Wheatland Ave.  
Shadow Hills, CA 91040

October 6, 2002

VIA FACSIMILE  
213-978-1343

Ms. Maya Zaitzevsky  
Project Coordinator  
City Planning Associate  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

Re: ENV-2002-2481-EIR/Canyon Hills Project/Whitebird Development

Dear Ms. Zaitzevsky:

The magnitude and location of the above referenced project require that the scope of the EIR include all of the categories listed in the City's Initial Study and Checklist pursuant to the California Environmental Quality Act. More specifically, the EIR should address the various sub-categories that are listed under the following headings: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Utilities/Energy Conservation, and Mandatory Findings of Significance.

In addition, I emphasize that the project should conform to the Sunland-Tujunga-Lakeview Terrace-Shadow Hills-East La Tuna Canyon and the Sun Valley-La Tuna Canyon Community Plans and all zoning requirements. It is misleading to focus on the project site's total acreage to determine the project's compliance. Each lot must comply with the respective Community Plans and zoning requirements, regardless of the total acreage.

Finally, thank you for holding the Scoping Meeting on September 23, 2002 and for your attention to this matter.

Very truly yours,

MARIA MEJIA

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# CANYON AREA PRESERVATION

Information about preserving our canyons, hillsides, and the foothills.

October 6, 2002

Maya E. Zaitzevsky  
Dept. of City Planning Project Coordinator  
200 N. Spring Room 763  
Los Angeles, CA 90012

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RE: Canyon Hills Project  
EAF No.: ENV-2002-2481-EIR

Dear Ms. Zaitzevsky:

The following are some of the issues that need to be addressed by the applicant in the Environmental Impact Report to be prepared, and other considerations regarding the Community Plan and Specific Plan for the area:

## General

1. Send out future notices to all residents in the affected communities. By notifying only those within 500' of the project, many people who will have to contend with this project are missing their opportunity to comment. Extend the notification radius to the entire affected zip codes in Sunland, Tujunga, Lake View Terrace, Shadow Hills, La Tuna Canyon, and Sun Valley.
2. Identify and notify all community organizations in the affected communities. Include homeowner associations, chamber of commerce groups, service organizations, neighborhood watch groups, community associations, school groups (PTA, etc.).
3. The community was not adequately prepared to comment on this project at the Notice of Preparation on September 23, due to unfamiliarity with the process. Please hold another scoping meeting to take input, now that residents are more familiar with what information can be provided. Begin the next meeting with a discussion of the process and encourage questions.
4. Instruct the developer to provide current maps and descriptions of his project considering the changes that will be required due to the recent passage of the Scenic Preservation Specific Plan. It was a waste of everyone's time to sit through a hearing based on incorrect maps and plans.
5. Please provide the maximum amount of time, 90 days or more, for the community to respond to the DEIR. This is a very hot issue in the community. Since we all work at other jobs, it is important to allow enough time for groups to get together and thoroughly discuss the proposed project.

# CANYON AREA PRESERVATION

Information about preserving our canyons, hillsides, and the foothills.

## Community/Specific Plans

1. Determine existing entitlements. Developer claims to be allowed 280 homes over entire owned area that he wants to cluster. First, an independent body needs to make that determination showing methodology for calculating allowable buildings. Area is now zoned mostly A1-1, but Slope Plan Amendment and Hillside Density Ordinance affect a majority of the area, since the land is primarily slopes and hills. The community needs to know what is the starting point. If the project site is 887 acres, initial calculation based on A1-1 of one house every five acres indicates a starting point of 177 homes or less, and this number should be significantly reduced by applying the other ordinances.
2. Determine current restrictions on existing property. The developer has stated that a large portion of the land he owns will be dedicated as open space, as part of his justification for asking for zone changes and Plan amendments. What parts of that land are now encumbered by drainage easements, utility and street easements, blue-line stream designations, or other agreements or rights-of-way issues. These kinds of determinations help assess the value and/or legalities of his offer.
3. Require that one alternative development proposal reflect what would be allowed currently under existing zoning and land use regulations, without any zone changes or plan amendments. This is important to help everyone realize the true impact of any request for changes beyond what would be allowed under the existing Community and Specific Plans.
4. Require disclosure of all other property owned in the area and plans to develop this property. This would apply to any property in which the applicant has an interest but is not listed as an owner, and should include property in nearby Glendale in the Verdugo Mountains. For example, there is a flat piece of land at the southwest corner of the La Tuna Canyon Road exit (heading east) from the 210 Freeway and La Tuna Canyon Road, that the head of Whitebird told me was in a family trust, which he would pass along to his children. Will there be a commercial center put onto this land in the future? This kind of information is important to disclose now to properly evaluate the current project.
5. Consider the cumulative impact of this project on other approved and proposed projects in the area, especially as it relates to traffic. Other existing projects already include the Red Tail Golf Course, All Nations Church, Duke Development, and several developments in Shadow Hills, Lake View Terrace, and La Tuna Canyon. When the traffic studies are done, they should start with the elevated traffic figures of these projects and build on that.
6. The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan was just recently passed, and many people may not be familiar with it's terms and conditions. Also, many people may not be familiar with the basic Community Plan, and the other ordinances that pertain to the region. Please hold a community meeting to discuss these issues and inform as many people as possible, to avoid confusion in the future.

## Environmental

1. Wildlife corridors. How will this project affect the movement of existing wildlife through the area, extending from the Verdugo Golf Course to the east down to Sunland Blvd.

# CANYON AREA PRESERVATION

**Information about preserving our canyons, hillsides, and the foothills.**

2. Open Space dedicated by Duke Development. Duke had dedicated approximately 30 acres of open space on their adjacent development to ensure wildlife movement through the area, including on a now-designated Prominent Ridgeline. If Canyon Hills develops the lower portion of that ridgeline, and builds a road cutting off animal movement, what will be done to mitigate the loss of a major wildlife corridor?
3. How will the main access road for Area A (above the 210 Freeway), which comes off La Tuna Canyon impact the existing Duke Development project. That developer designated a significant amount of open space in his plan approval, and will any variances need to be granted on that project.
4. Water basin drainage. How will the local aquifer be affected when a significant amount of land will be graded and paved, and existing drainage patterns are disrupted?
5. Light pollution. The area currently has no night lighting, including no street lamps along the 210 freeway between La Tuna Canyon Road and Sunland Blvd. Evaluate how the new lighting required for the project will affect residents and animal life in the area.
6. Underground utilities. The Community Plan calls for underground utilities, and this should apply to the lines feeding any new project, even if the City built the lines. If existing power lines need to be upgraded to feed the project, they should be placed underground at the time of upgrading.
7. Identify any canyons, streams, or prominent landforms that will be affected or cut off by grading on other parts of the project.
8. It is already apparent that the proposed project may not meet fire department access rules. What are their alternatives for secondary access to the main Area A that do not include locked gates? If the project will require secondary access from Foothill Blvd., that should be considered a major change requiring a completely different application, rather than a simple amendment, due to the major impact that would have on additional communities.

We are familiar with the general requirements of Environmental Impact Reports, so we won't repeat requests for information that is already required. However, it is extremely important that the EIR follow CEQA rules, and that issues required to be addressed are done so objectively and without equivocation.

Thank you in advance for considering the effects of this significant project on the existing community. It will be very difficult to coordinate all the input required, and I hope that you will take the time to make a thorough evaluation.

Sincerely,

Steve Crouch

Candace A. Young, PhD

Via e-mail



**Virginia A. Sloane  
Paul G. Sloane  
8511 La Tuna Canyon Road  
La Tuna, CA 91352  
818-352-5214**

---

October 7, 2002

Maya Zaitzevsky, Project Coordinator  
**Los Angeles Department of City Planning**  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

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OCT 08 2002  
ENVIRONMENTAL  
UNIT

**EAF NO: ENV-2002-2481-EIR**

**PROJECT NAME: Canyon Hills Project**

**Re: COMMENTS on PRE-DRAFT EIR**

I am submitting the following comments as trustee of the trust which owns the real property and home located at 8511 La Tuna Canyon Road and on behalf of my mother, Virginia A. Sloane, who has resided at 8511 La Tuna Canyon Road for 53 years. Our property is located within 500 feet of the proposed project and will be directly impacted by all the project impacts discussed below.

**1. Flooding:**

The flood control channel that facilitates all of the winter runoff from rains down La Tuna Canyon is adequate only to handle normal/moderate rainfall. Historically, whenever the rainfall is heavy, the control channel overflows and causes significant road damage. In fact, in 1978 when a series of conditions came together to create an over abundance of flood water, the residence at the aforementioned location was destroyed by floodwaters.

If this project is allowed to be built at the density proposed it will create a hard scape made up the new driveways, patios, pools, streets, roof tops, and lawns, that will greatly reduce the dispersion and absorption of the land in its natural state and thus greatly augment runoff. The overabundance of runoff created by the development can be expected to more readily overwhelm flood control channels, which have already proven susceptible to flooding. We fear for our property and my mother's safety since our property is in the direct path of the winter runoff. In addition, there are several clusters of other homes located in the narrow canyon, west of the proposed development and east of the flood control catch basin. In other words, these properties, like ours, are below the proposed development but above the flood control basin. Thus nothing stands between them and the augmented run-off from the new development.

**See exhibit photos C, D, E & F attached.**

A thorough study of the effects of the proposed development on winter water runoff in the control channel and mitigation measures for future runoff at build out must be completed, and necessary mitigation measures undertaken by the developer

**2. Traffic:**

The upper portion of La Tuna Canyon Road was originally built around 1970 using primarily inmate labor. The road was inadequately engineered causing many accidents, creating landslides, mud and debris on the road during the wet seasons. More importantly, the design of the road will not facilitate the Level of Service (LOS) required to service the increased traffic created by the development.

La Tuna Canyon Road at the 8500 block is a historically dangerous stretch of roadway with a multitude of serious accidents occurring at this location over the years. The road is squeezed between the flood control channel and residential property. There is no land available to widen or re-engineer the road.

**See exhibit photos A & B attached:**

A thorough, neutral study of the existing Level of Service (LOS) and projected LOS at build out must be completed, as well as a historical report of accidents and injuries that have occurred at this location over the past decade. The City would do well to consider its obligation to the existing residents and driving public generally if it allows increased vehicle trips to be dumped into this already dangerous stretch of road without any mitigation.

**3. Noise:**

Presently La Tuna Canyon Road is less than 150ft from the residences and at the high speeds that cars travel through this section of the canyon, it is already impossible to leave windows or doors open due to the noise. Once the project is completed the LOS will be significantly higher and the noise level will be at an un-acceptable level for comfortable living.

Decibel levels at the 8500 block must be recorded and new decibel levels calculated at project build out.

**4. Environmental and cultural issues:**

La Tuna Canyon is an untouched pristine wilderness with an abundance of flora and fauna whose mere existence is continuously threatened by ongoing encroachment. Long-term studies by genuinely neutral experts of the various species now present must be conducted to determine the current inventory and health of plants and animals in this rich riparian canyon habitat, the long-term effects on both after project build out, and appropriate mitigation measures, if any are possible. In addition, the use of this canyon by the pre-European indigenous peoples must be examined by genuinely neutral experts, the facts developed in good faith, and if called for, mitigation measures developed. Naturally, all related state agencies should be consulted with respect to the entire range of potential effects of the project. The City would do well to ask itself whether it is appropriate to allow this kind of development at all in a pristine area such as this within its boundaries. Such areas should be preserved and protected, not exploited. Los Angeles hardly has a shortage of build able land for such developments.

**5. Fire; earthquake; geological:**

Over the past 53 years we have lived through many fires both small and very destructive. We have seen our neighbors loose their homes to fire due to the steep terrain and difficulty in fighting these fires. Clusters of homes imbedded into the hillsides will only exacerbate the fire danger and make evacuation even more difficult for those who live in the canyon bottom,

where direction of travel is very limited. In addition the EIR must address the project's geological effect, such as the potential for slides and increased damage in the event of earthquakes.

**6. Zoning:**

La Tuna Canyon has historically been zoned A-1 which allows for the keeping of horses and animals. The proposed project requires the altering of the A-1 zoning to facilitate the clustering and density of the housing. Consequently, the environment of La Tuna Canyon will be forever altered, as the animals, plants and open space are replaced with denser, suburban housing. The EIR must address these long-term, radical effects of the project on the existing community.

What will the environmental impacts be if the project is built at present A-1 or A1-1 zoning? And what will the environmental impacts be if the project is built at the proposed more dense zoning?

**7. Scenic Specific Plan:**

The Los Angeles City Council has recently adopted an amended Scenic Specific Plan. What impact will the project have at build out on the environment if the Scenic Specific Plan is not further altered? And how will the environment be impacted if the Scenic Specific Plan is further modified?

**8. Community Plan:**

The City of Los Angeles has a Community Plan that has been in effect and un-modified for the past twenty years. What will the environmental impacts be on the community as a whole if the City's Community Plan is modified to facilitate this project? What will the environmental impacts be if the Community Plan is not modified to facilitate the project, and the project is required to be configured to fit within the scope of the Community Plan?

We need a reasoned, neutral and complete document. The residents of the community will not tolerate a white-wash job controlled by the developer to facilitate project approval. Rather, we expect this Department to respond to the community's concerns by making sure that the EIR identifies the real effects of the project, conceives imaginative and effective mitigation measures where possible, and realistically acknowledges the impossibility of mitigation. Once such realistic information is before the Department, we hope you will have the courage to determine, as supported by the facts, the appropriateness of changing all the existing government restrictions and criteria for development in this area to accommodate this project.

Respectfully submitted,

Paul G. Sloane

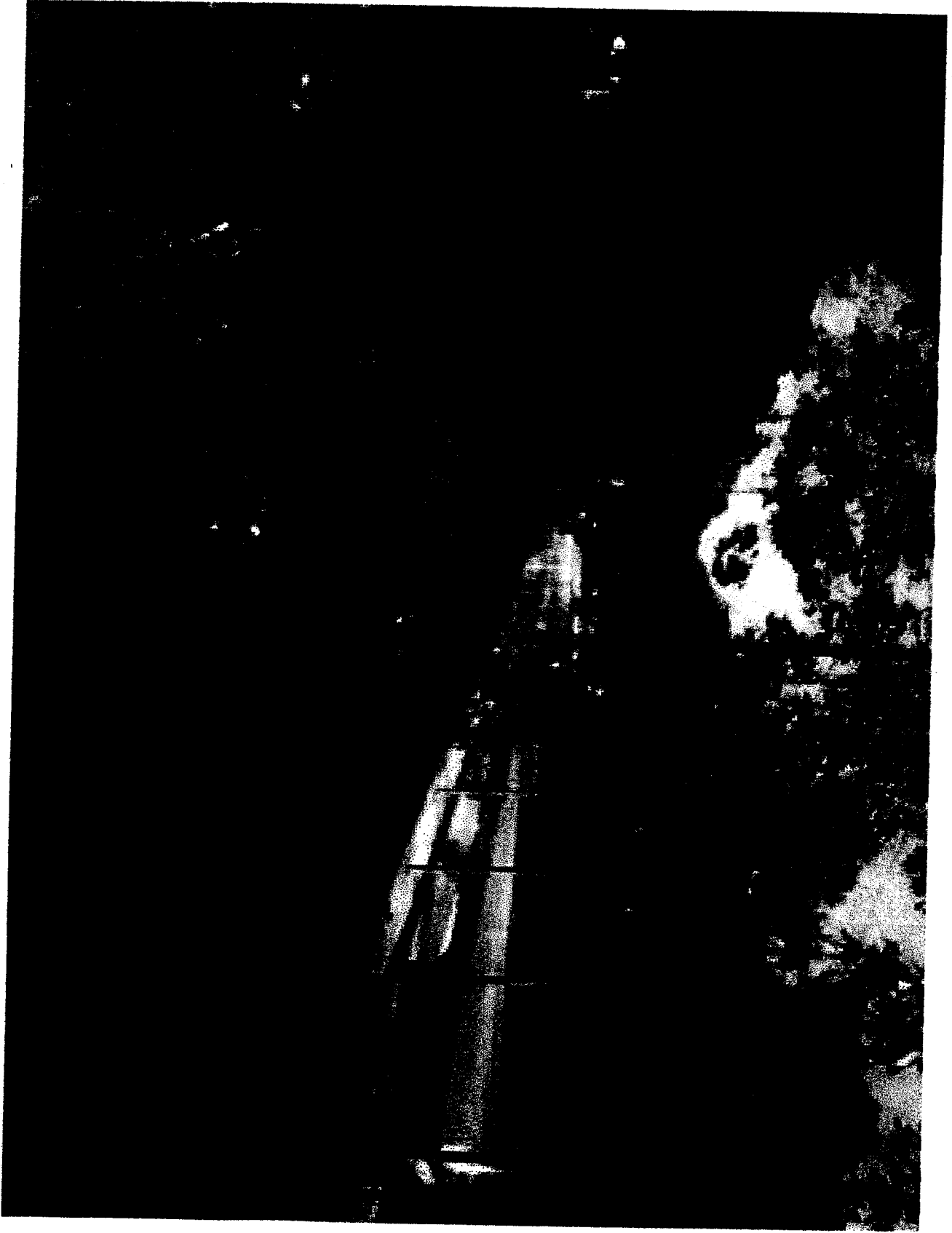


Exhibit A



Exhibit F

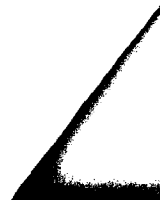




Exhibit E



Exhibit D





Exhibit C





Exhibit B

October 4, 2002

Ms. Maya Zaitzevsky  
Project Coordinator  
Department of City Planning  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

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CITY OF LOS ANGELES

OCT 08 2002

ENVIRONMENTAL  
UNIT

Dear Ms. Zaitzevsky,

RE: Notice of Pre-Draft Environmental Impact Report Request for Comments  
EAF No.: ENV-2002-2481-EIR

As Whitebird was so involved in the writing and negotiations of the recently passed Scenic Preservation Plan, I feel very strongly that Whitebird be held to all of its stated restrictions, with the city granting NO General Plan Amendments. A direct, private participant in the process of determining public policy should, AT THE VERY LEAST, abide by that policy. I quote from the addition passed by City Council, Section 3.B.


"However, it is the intent of this Specific Plan that its provisions regarding grading or development shall control within those parts of the plan area that are designated as Prominent Ridgeline Protections Areas and that the grading or development provisions of the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan (including, but not limited to, footnotes 4 and 7), the Slope Density Ordinance and the Hillside Ordinance, shall control outside the areas designated as Prominent Ridgeline Protection Areas."

As Whitebird successfully removed prominent ridgeline designations from some of their properties, they should now be held accountable to the aforementioned restrictions.

I would also like to reiterate one point made by Fred Dong, Chairman of the Crescenta Valley Sierra Club for the Sierra Club:

1. Besides the Project and No Project alternatives that should be fully discussed in the EIR, there should be at least one other alternative. This alternative should fully discuss the impacts of a development conforming to the current zoning for the properties, Very Low I Residential, Very Low II Residential, A1 Agricultural, and RE11 Residential Estate, conforming to the recently passed San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, and conforming to any Los Angeles City slope density and hillside ordinances. This alternative is very important as a benchmark comparison of the present proposal to what is currently allowed. This alternative would be important for the Planning Department to make an informed recommendation, each of the City Commissions that further review the project, and City Council who will make a decision on this project.

Sincerely,



Fred Fehlau  
9360 Reverie Road  
Tujunga, CA 91042

Cc: Wendy Greuel, Dale Thrush

**RECEIVED**  
CITY OF LOS ANGELES  
OCT 07 2002

CITY PLANNING  
DIVISION OF LAND

FRANK BUCHANAN  
8351 LA TUNA CANYON ROAD  
SUN VALLEY, CA 91352

**CANYON HILLS PROJECT**  
**LA TUNA CANYON, CALIFORNIA**

**INFORMATIVE COMMENTS REGARDING THE PREPARATION OF THE  
ENVIRONMENTAL IMPACT REPORT AS IT AFFECTS LA TUNA CANYON**

MAYA ZAITZEVSKY  
DEPARTMENT OF CITY PLANNING  
CITY OF LOS ANGELES, CALIFORNIA  
200 NORTH SPRING STREET, ROOM 763  
LOS ANGELES, CALIFORNIA, 90012  
(213) 978-1355

OCTOBER 7, 2002

MAYA ZAITZEVSKY AND ALL WHOM IT MAY ALSO CONCERN:

I consider the comments in this letter to be of the utmost importance as the property I own is immediately adjacent to the portion of the Canyon Hills Project that is contained within La Tuna Canyon. In fact, my property is the final property of the residential district on the North side of the highway as you head East up La Tuna Canyon Road from Sunland Blvd. in Sun Valley before the Whitebird development company's property acquisition begins, which means that I am immediately subject to the natural rain water drainage as it emerges from the project site.

I have owned my property for 17 years. I own 5 adjacent parcels with the following addresses: 8351, 8350, 8321, 8320, 8341, and 8340 La Tuna Canyon road (the strange and numerous addresses involve a long story). 2 houses are located on my 5 parcels. Due to my long history in the canyon, I believe that I am an expert in the area regarding water flow and flood control, traffic patterns, highway construction problems, animal population, and public recreation. I have a B.S. in Engineering and a B.A. in Law.

It is my position that I must state that the Canyon Hills Project will have an extremely deleterious impact on La Tuna Canyon for the following reasons:

- 1) **FLOOD CONTROL/ RAIN WATER DRAINAGE:** A natural streambed runs down the center of La Tuna Canyon, providing drainage from rainfall in the surrounding mountains. This streambed runs through the properties of several residents, including mine. I estimate that the stream runs about 800 feet through my property. In some years the water runs year-round if we've had consistent rain during the rainy season. Despite the common idyllic nature of the stream, during heavy rains water empties down off the highway and floods the narrow channel. The water surges over the banks as it torrents 5 to 10 feet deep with sufficient force that would easily kill anyone who should fall into it.

Not every year does the stream flow so mightily. Standing out are the flood years of 1978, 1986, 1992, and 1998. In 1978, coupled with the construction of the 210 freeway, the floodwaters reached such force that many people lost their homes. On my property alone, 2 homes were destroyed. The owners at the time were saved from drowning only by a miracle: trapped in their home as the waters filled their house, their faces pressed against the ceiling gasping for their final breaths, the wife managed to break a skylight out with a floating water ski and pulled her family to safety on the roof!

Somehow 2 homes on my property survived that 1978 flood but the other 2 were destroyed. The two that still stand were built in 1938 and 1927. If it hadn't been for the construction of the 210 freeway, almost certainly the other 2 would still be standing today.

The drainage in the area has proven to be a delicate one. There is no underground storm drain system in upper La Tuna Canyon. Instead, drainage of the highway is directed through many culverts down to the streambed. The streambed finally empties into the earthen dam that is constructed 0.7 miles downstream from my property. The residents below this dam are protected against flooding by this construction. Above it, we residents are at the mercy of the terrain.

**PROJECT IMPACT:** The addition of new streets, sidewalks, rooftops, cement pads, etc. in the large proposed housing project will undoubtedly send additional water regularly every rainy season because there will be less ground surface area and natural foliage to soak this water up. Even if much of the new runoff is diverted into collecting ponds or somehow redirected, it will be virtually impossible to collect it all! **WE CAN'T TAKE EVEN ONE MORE DROP OF WATER IN THAT STREAM BED DURING A HEAVY RAIN. I HAVE NO DOUBT THAT IF THIS PROJECT IS IMPLEMENTED, I WILL LOSE MY HOUSES TO HEAVIER FLOODING!**

FURTHERMORE, there will be further destruction downstream. There is a bridge just west of my property boundary that is used by neighbors that is constructed from 2 concrete-covered steel corrugated culverts that has clogged many times over the years with branches and debris that float down during flooding (this bridge was completely destroyed in 1978 and immediately rebuilt). If not for the gallant efforts of all our neighbors to free the clogging during floods, this bridge and the surrounding channel banks would long ago have been washed out. Additionally, continuing downstream the banks of the channels are supported by a restraining wall made up of chain-link fence and rock fill. The chain-link fence is rusting through and many support poles have become unearthed or broken. A heavy flood will compromise these failing walls, and if that happens, homes and the highway could be washed out.

- 2) **TRAFFIC AND THE CONDITION OF THE HIGHWAY:** I read in the newspaper many years ago that La Tuna Canyon Road was constructed so poorly that accidents frequently occur. The City Of Los Angeles became so accustomed to being sued so frequently when road conditions were the cause of traffic accidents that they began to simply pay off these lawsuits without even contesting them. The problems with the highway were many: water collected on the road because of inadequate drainage and cars would skid out of control due to hydroplaning; the road is too narrow in spots; it has some relatively tight curves and was not "banked" correctly; the speed limit is high and speeding is the norm on this isolated rural road; there are no street lights through about half of the canyon and it is VERY dark at night.

About 5 years ago the City finally came through, closed down the highway, and attempted to reconstruct it. They added more culverts and improved the slope of the highway to achieve better drainage. They repaved it and changed the orientation of the lanes to address the narrow spots. They lowered the posted speed limit because they could not remove the tight curves or change the "banking". They passed laws that prevent trucks over 6000 lb gross from using La Tuna Canyon Road as a thoroughfare to limit potentially dangerous traffic and reduce disintegration of the delicate cliff-side roadway; there are signs posted at either end of the Canyon stating the prohibition.

While their efforts did improve the road somewhat, it is still ridiculously hazardous! Water still collects on the road in places and the hydroplaning has nearly sent me off the road several times! And the lane reduction bottlenecks that were implemented have increased the danger dramatically!

Previous to the rework, the highway had consisted of 4 lanes, 2 in each direction its entire length. Because of the curves, the narrow road space between mountain cutouts, and the necessity for residents to make left turns into their driveways, the road was reduced for two stretches to 1 lane in each direction with a turning lane installed in the center. While this turning lane has made it much

safer to make left turns and the driving lanes are now much wider, the bottleneck formed has made driving on the road even more perilous.

There are two bottlenecks where 2 lanes in each direction reduce to 1. They total 1 mile in length over a combined span of 1-½ miles. They occur where the speed limit is 45 miles an hour and the curves in the highway are the tightest. One of the bottlenecks converges right in front of my driveway and visibility is reduced due to the tight curves there. It runs approximately between the 8300 block and the 9000 block of La Tuna Canyon Road.

Accordingly, there seems to be more accidents than ever right in front of my property! I estimate that at least 5 accidents a year occur in the same spot at the mouth of my driveway where the bottleneck culminates. One vehicle careened off the road last year into the streambed channel, taking out a neighbor's fence and guardrail. 2 other accidents wiped out my mailbox each time. In another accident, the rear axle of a vehicle with its wheel and tire still attached flew down from the highway and blasted through the wall of my house, completely destroying my bathroom sink. The owner actually came down and retrieved his axle with the assistance of my elderly tenant while I was away. He didn't notice the damage to my house, did not think to gather information and I was left with no way of obtaining compensation.

The guardrails on the highway are constructed of simple wood-post and galvanized steel. They will not prevent a vehicle from flying over the side of the road down onto my house if there is a head-on collision. It is only a matter of time until this happens!

The occurrence of horn-honking, angry yelling, and squealing tires and brakes at this bottleneck have reached ridiculously high levels. As a resident, I find it is a distressing existence to be subjected to this onslaught of violent noise, especially since the reason that I bought canyon property was in pursuit of privacy and peace & quiet. This noise did not occur before the highway rework, and I am certain that it is due to the bottleneck!

**PROJECT IMPACT:** The two bottlenecks occur in the immediate vicinity of La Tuna Canyon Road where the Canyon Hills Project plans to construct two access bridges to connect to the highway. The bottlenecks comprise a full mile of the highway, which means it constitutes 20% of the total Canyon highway length between where it begins at Sunland Blvd. and ends at the intersection with the 210 freeway! **Please visualize this! 20% of the highway, centered at the outlet of the Canyon portion of the project, is only 1 lane in each direction!** Only a complete rebuilding of the upper half of La Tuna Canyon Road, including widening and straightening, will allow the highway to safely accommodate the new traffic from the project! The road is already ridiculously unsafe! **Allowing the Canyon Hills Project to be built without reshaping the highway will make it absolutely deadly!**

**QUICK-FIX IS AN ADMISSION OF NEGLIGENCE:** If the City's decision is to perform a quick-fix solution by remarking the existing lanes back into 4 lanes (which the City 5 years ago determined was an unsafe orientation), thereby erasing the bottlenecks and eliminating the turning lane, then this will provide legal, sure evidence that the road as it exists today has been negligently maintained in an unsafe manner. Combined with the unsafe orientation as it existed 5 years ago, this should provide fodder for further legal action against the City for anyone involved in an accident on La Tuna Canyon Road at any time, then, now, or in the future!

**LOCAL TRAFFIC VERSUS COMMUTER TRAFFIC:** The Canyon Hills Project will introduce a new element into the traffic on La Tuna Canyon Road. Most of the current traffic is commuter traffic traveling through connecting areas such as Sunland-Tujunga. This is readily evidenced by the wide differential of traffic patterns throughout the day. At rush hour periods, traffic is heavy, but drastically tails off at all other hours. Local traffic is always light! The Canyon Hills Project will change this. Local traffic will more than double, which means ALL hours will experience moderate to heavy traffic. For current residents located immediately on the edges of the highway, **La Tuna Canyon will be more like a freeway** than the peaceful scenic road which naturally characterizes rural areas in general. The

noise! The traffic! The accidents! The hazards to residents! The air pollution! How can the City possibly allow this project to be built and introduce these factors in such a beautiful area?!?

- 3) **SCENIC PRESERVATION PLAN:** Several years ago the City of Los Angeles elected to make an effort to maintain La Tuna Canyon as a scenic avenue and limit development and growth. The Scenic Preservation Plan was implemented to keep new building from interfering with the visibility of the beautiful mountainsides. Zoning laws were changed that require a minimum 2.5 acres per land parcel in order to build one residential unit. Utility, grading, and shoring requirements were maximally enforced in order to discourage further building. One realtor expressed to me that "there is a moratorium on building" in La Tuna Canyon to metaphorically express the extent to which the City had steered its building plan approval policies. I personally experienced this on my property and the properties of 3 adjacent neighbors

Many acres of land on the South side of the highway (coincidentally in the immediate vicinity of the proposed Canyon Hills Project site) were obtained in a deal with a developer and permanently converted into public recreation land under the administration of the Santa Monica Mountain Conservancy Group which constructed hiking trails and picnic benches. In exchange for his donation of this land, the developer was allowed to build a 25-home tract on the 9100 block of the newly created Morning Glow Way immediately adjacent to the 9800 block of La Tuna Canyon Road. In response to the objections to this project by residents, at the time that the deal with the developer was announced, a City official was quoted in the Los Angeles Times newspaper as proclaiming that this would be the last major development ever allowed in La Tuna Canyon again as he propounded the benefits that the donated land would provide! What happened to that proclamation? Just a decade later and the City is once again about to allow the biggest development ever in La Tuna Canyon with the Canyon Hills Project!

**PROJECT IMPACT:** there is no room for any kind of tract development in La Tuna Canyon that conforms with the scenic and recreation nature for the Canyon as it currently exists. The development will completely obliterate any semblance of nature that the Canyon currently possesses and DESERVES.

- 4) **NATURE:** there are several factors of nature that are inherent in La Tuna Canyon. The streambed itself runs through 2 miles of wilderness before it reaches my property. This area is very beautiful and enjoyed by hikers and nature lovers. The stream meanders through groves of trees and rock formations as it serves as the basis of an ecological biosystem for the animal inhabitants that call it home. Many different animals live in this area and depend on the stream for their livelihood. I have personally seen all these animals in abundance using the grounds adjacent to the stream as their homes: Deer, Raccoon, Skunk, Owls (several types) hawks, opossum, wild cats (such as bobcats), coyote, snakes (many types: king, rattle, gopher, & garter), rabbits, and many, many birds. Many of these animals use the hills as their grazing/roaming grounds as it all encompasses one huge system.

**PROJECT IMPACT:** The natural living grounds will be destroyed for ALL the animals living everywhere in La Tuna Canyon. The development will remove the actual place they live. It will remove their grazing/roaming grounds. It will destroy the delicate & unique hierarchical structure that Coyotes live within that actually limits their growth (according to scientific studies): Coyotes will actually increase in population, endangering current residents even further, if their hierarchy is destroyed (this has been proven!) Grading will destroy the beautiful streambed above my land which is the lifeblood for all these animals. Ecological disaster will be unavoidable.

- 5) **LOT BOUNDARIES:** Surveyor lot lines as written in the official descriptions by the Assessor's officer to define the property lines for all residents in the upper canyon are so antiquated that it may be impossible to accurately discern where individual parcels actually lie. For example, the property lines for my five parcels is centered "a nail place in the base of an old Oak Tree located in the bottom of the Canyon". The old Oak Tree has since died before I purchased the property. Although I was shown

where it used to stand, there is absolutely no sign of exactly where it used to be. The identifying points for establishing property lines were established long before the highway was built.

**PROJECT IMPACT:** It is likely that the large, overbearing development company will build wherever it thinks it can get away with it. As I share about 500 feet of property line with the Canyon Hills Project, I fear greatly that I may get into a legal war over where the actual lines are, especially as it is steep, rough-terrained hillside that it is in question. I cannot afford an independent surveyor's fees to establish lot lines; I have checked in the past, and it is likely that to have my 7 acres accurately surveyed will cost over \$10,000. I would look to the City to protect residents from this kind of conflict with the developer by footing the bill for an independent surveyor's report or requiring the developer to employ an independent developer.

- 6) **POLLUTION:** The Canyon is a beautiful scenic wilderness area relatively free of pollution. The skies are blue. The air feels fresh. A gentle breeze always blows through the canyon. It is relatively quiet (except at rush hours). The sky is black at night and you can see many stars.

**PROJECT IMPACT:** The noise pollution from the heavier traffic will become intolerable as it is already distressing. The lights from the new home and streetlights will make it seem that I am living in the city. I won't be able to see the lights at night. The water coming from the stream, already in question because of illegal dumping, will likely become intolerably polluted (I use some of this water for watering my grounds). Increased traffic will increase the amount of local air pollution.

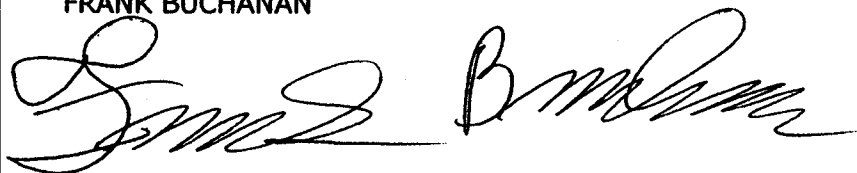
**SUMMARY:** I urge the City Of Los Angeles to deny any tract development in La Tuna Canyon because a scenic area with a delicate ecosystem is no place for this kind of project. I know that the project is to be divided into two parts. The portion nearest Sunland-Tujunga must be cut down in size to avoid the problems mentioned in this letter. The portion in the Canyon itself must be completely denied or else the canyon will be reduced to a mere hillside development area rather than a scenic recreation area. By maintaining the current Agricultural zoning laws, the city might find fuel enough to limit or prevent any of the development from taking place at all. Developers can find hillside somewhere else to build; there is no room for this in a beautiful wilderness area.

Residents for years have sought La Tuna properties to make their homes in order to get away from the crime, noise, and business that city living involves. I thought that I was protected against development by the policies that the City had maintained regarding La Tuna Canyon; else I may have never bought or sold out years ago. I don't want to live in an area where neighbors are looking down into my yard from hillside homes that I thought could never have been allowed to be built!

**FOR THE GOOD OF THE CANYON AND FOR THE GOOD OF RESIDENTS WISHING TO LIVE IN PEACE AND QUIET, PLEASE DENY THE CONSTRUCTION OF THE CANYON HILLS PROJECT!!!!!!**

Sincerely,

FRANK BUCHANAN

A handwritten signature in black ink, appearing to read 'Frank Buchanan', written in a cursive style.

Maya Zaitzevsky, Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES  
OCT 08 2002  
ENVIRONMENTAL  
UNIT

October 3, 2002

Re: Response to Canyon Hills Project (EAF NO. ENV-2002-2481-EIR) EIR NOP

Ms. Zaitzevsky;

I am writing to you on behalf of the Glendale/Crescenta Volunteers Organized In Conserving the Environment, or VOICE. VOICE represents over 5,000 people in Glendale, Burbank, Los Angeles, and surrounding communities. Our primary focus is on the Verdugo Mountains and the surrounding area.

We believe it is essential that the Canyon Hills EIR thoroughly and rigorously examine the following:

- **Traffic**
  - Trip generation estimates use per-household factors typical of the specific type of housing to be built, not just a blanket average.
  - Careful attention to the location and timing of traffic counts.
  - A assessment of the public safety impact of proposed mitigations.
  - An assessment of the environmental impact of any proposed road widening or new connections, including cumulative and growth-inducing effects.
- **Cumulative Impacts and Land Use**
  - Consider land that is buildable under current regulations, not just proposed projects.
  - Consider projects outside the Los Angeles city limits.
  - Consider the project in the light of pre-existing cumulative effects from 200 years of poorly planned development.
  - Consider the grow-inducing effects of any infrastructure improvements. For example, will new sewers and water mains increase the likelihood that neighboring properties will be developed?



- If zone changes or other regulatory relief are requested as part of the project, similar zone changes and relief should be assumed for nearby properties under the lead agency's jurisdiction, and the cumulative effects analyzed.
- ***Biological impacts and wildlife corridors***
  - The Verdugo Mountains are a fragile ecosystem that has been almost entirely cut off from the Santa Monica Mountains and San Gabriel Mountains: assess the impact on the future viability of this ecosystem as a result of the project's impact on wildlife corridors.
  - Ensure that biological surveys are done at the appropriate time of year, and in sufficient depth to ensure that a comprehensive job is done.
  - Thoroughly investigate reports of the presence of threatened or endangered species.
  - Identify mitigations that create new habitats instead of displacing or "improving" existing resources.
  - Consider requiring construction of, or enhancement of existing, wildlife pathways between the San Gabriel and Verdugo Mountains, including a bridge or tunnel to facilitate wildlife crossing the 210 freeway.
  - Consider the potential impact of livestock waste on surrounding subsurface and surface waters.
- ***Public Health***
  - Identify any potential sensitive receptors who might be disproportionately affected by noise, construction dust, earth shaking, or any others environmental disturbances during construction or operation of the project.
- ***Public Safety***
  - Provide realistic estimates of emergency response time.
  - Assess the public safety impacts of increased traffic on La Tuna Canyon Road.
  - Assess the impact of proposed public safety mitigations such as additional ingress and egress as though they were part of the proposed project, especially if such mitigations will be required to comply with applicable regulations.
- ***Visual impacts***

- Select sites for visual simulation that provide a clear view of the project; views from locations where the project is not clearly visible communicate only that “you can’t see it from here”, and do not convey an accurate understanding of what the project will look like.
  - Use accurate representations of the development in visual simulations; home size, setbacks, landscaping and building materials should all follow applicable regulations or typical values.
  - Provide simulations that show what the project will look like at construction, in five years, and twenty years, not just an idealized view after all potential landscaping has grown to maturity.
- ***Recreation***
    - Require construction of recreational facilities instead of accepting cash payments.
    - Consider requiring construction of improvements to nearby hiking and riding trails as part of a mitigation package.
- ***Public Services***
    - If the existing service infrastructure is insufficient to serve the project, require construction of facilities prior to issuing the first occupancy permit.
- ***Alternatives Analysis***
    - Include detailed information on the size and characteristics of development that would be allowed if the zone changes, general and/or specific plan amendments, and other regulatory relief requested as part of the project were not granted.

In addition to the above analyses, we request that:

- Proposed mitigations be feasible, effective, and rigorously enforced,
- Mitigations for all impacts be required as a condition of entitlements,
- A realistic plan for monitoring compliance be in place when the EIR is certified,
- And continued compliance with all applicable mitigations be demonstrated prior to issuing the first occupancy permit.

Although CEQA does not provide specifically for this analysis, we would encourage the authors of this EIR to remain sensitive to the issue of quality of life. No other term better summarizes what the California Environmental Quality Act is all about. We care about the environment because it directly affects our lives. How will this project affect the lives of those who live and work nearby? If it will improve their quality of life, we would like to know how. Conversely, if their lives are likely to be adversely affected, we want a clear understanding of those effects.

Above all we need a well-organized document written in clear, easy to understand language, well supported by objective facts and analysis. The EIR is an information document, not just for the technocrats, but most importantly for the community. An obscurely written report will effectively bar local residents from the decision-making process.

We thank you for the opportunity to participate in the Canyon Hills environmental review process.

Sincerely,



Steve Larson

Chair, Environmental Review Committee  
Glendale/Crescenta VOICE  
PMB 369  
249 N. Brand Blvd.  
Glendale, CA 91203

10825 Tuxford Street  
Sun Valley, CA 91352

September 30, 2002

Maya E. Zaitzevsky, Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES  
OCT 03 2002  
ENVIRONMENTAL  
UNIT

Dear Ms. Zaitzevsky,

As a voter and resident of La Tuna Canyon I would like to express my strong opposition to the Canyon Hills Project, EAF NO.: ENV-2002-2481-EIR.

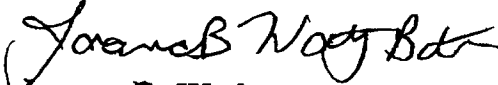
I also oppose the proposed General Plan Amendment that would permit the change in the Sunland-Tujunga Community Plan land and use designations, on the developed portion of the site, from Minimum Residential, Very Low I Residential, and very Low II Residential to Minimum Residential and Low Residential. I also oppose proposed zone changes for the developed portions of the site from A1 Agricultural and RE 11 Residential Estate to RE9-H Residential Estate and RE11-H Residential Estate. I also oppose the proposed conditional use permit for an equestrian park on the proposed three acre site adjacent to La Tuna Canyon Road.

The Canyon Hills Project will ruin the rustic/rural atmosphere of both South Sunland and La Tuna Canyon, the rural atmosphere is the primary reason people live in these two areas. This proposed project will negatively affect and eliminate a significant portion of one of the last Coastal Sage Scrub Ecosystems. The building of approximately 210 homes North of the Interstate 210 will; eliminate wildlife habitat (some possibly endangered), eliminate indigenous plants (some possibly endangered) eliminate the view of beautiful natural hillsides for people driving on Interstate 210 and replace it with yet another ugly scarification of the hillsides and nests of houses similar to what one sees has been done in Glendale as one drives along the 2 Freeway, and the solitude and natural ridgelines of South Sunland homes will be eliminated by these homes which will loom over the existing homes. The building of approximately 70 homes South of Interstate 210 in La Tuna Canyon will eliminate the rural nature of this horse property community by adding two access streets (possibly with traffic lights), people driving along

La Tuna Canyon Road will not see their beloved natural views of the hillsides, but more tract homes on small lots that will decrease the property values of the neighborhood. Residents of La Tuna Canyon like the fact that this is the last vestige of agricultural property in Los Angeles where they can have large parcels of land to keep horses or other animals or to have orchards or beautiful gardens with seclusion.

I would like to be added to the list of stakeholders who are informed of the status of this project, and of community meetings.

Sincerely,

  
Joanna B. Watkyns-Batchelor

10825 Tuxford Street  
Sun Valley, CA 91352

September 30, 2002

Maya E. Zaitzevsky, Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

OCT 02 2002

ENVIRONMENTAL  
UNITS

Dear Ms. Zaitzevsky,

As a voter and resident of La Tuna Canyon I would like to express my strong opposition to the Canyon Hills Project, EAF NO.: ENV-2002-2481-EIR.

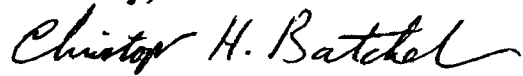
I also oppose the proposed General Plan Amendment that would permit the change in the Sunland-Tujunga Community Plan land and use designations, on the developed portion of the site, from Minimum Residential, Very Low I Residential, and very Low II Residential to Minimum Residential and Low Residential. I also oppose proposed zone changes for the developed portions of the site from A1 Agricultural and RE 11 Residential Estate to RE9-H Residential Estate and RE11-H Residential Estate. I also oppose the proposed conditional use permit for an equestrian park on the proposed three acre site adjacent to La Tuna Canyon Road.

The Canyon Hills Project will ruin the rustic/rural atmosphere of both South Sunland and La Tuna Canyon, the rural atmosphere is the primary reason people live in these two areas. This proposed project will negatively affect and eliminate a significant portion of one of the last Coastal Sage Scrub Ecosystems. The building of approximately 210 homes North of the Interstate 210 will; eliminate wildlife habitat (some possibly endangered), eliminate indigenous plants (some possibly endangered) eliminate the view of beautiful natural hillsides for people driving on Interstate 210 and replace it with yet another ugly scarification of the hillsides and nests of houses similar to what one sees has been done in Glendale as one drives along the 2 Freeway, and the solitude and natural ridgelines of South Sunland homes will be eliminated by these homes which will loom over the existing homes. The building of approximately 70 homes South of Interstate 210 in La Tuna Canyon will eliminate the rural nature of this horse property community by adding two access streets (possibly with traffic lights), people driving along

La Tuna Canyon Road will not see their beloved natural views of the hillsides, but more tract homes on small lots that will decrease the property values of the neighborhood. Residents of La Tuna Canyon like the fact that this is the last vestige of agricultural property in Los Angeles where they can have large parcels of land to keep horses or other animals or to have orchards or beautiful gardens with seclusion.

I would like to be added to the list of stakeholders who are informed of the status of this project, and of community meetings.

Sincerely,



Christopher H. Batchelor

**WILLIAM E. EICK**  
ATTORNEY AT LAW  
2604 FOOTHILL BOULEVARD, SUITE C  
LA CRESCENTA, CALIFORNIA 91214

TELEPHONE: (818) 248-0050

FACSIMILE: (818) 248-2473

October 2, 2002

Maya E. Zaitzevsky, Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, California 90012

**RECEIVED**  
CITY OF LOS ANGELES

OCT 03 2002

ENVIRONMENTAL  
UNIT

Re: ~~Canyon Hills Project~~  
EAF No-ENV-2002-2481-EIR

Dear Ms. Zaitzevsky:

These are the issues which need to be addressed in the Draft EIR in addition to those in the Areas of Probable Environmental Impact.

1. Heavy truck traffic is prohibited on La Tuna Canyon Boulevard due to the winding and dangerous roads. How will garbage trucks after completion of construction and construction equipment during construction enter and exit the property? What effect will the heavy truck prohibitions have on other access roads?
2. In order to protect the Scenic Corridor views, all utilities should be underground including the recently constructed electric lines from Honolulu to Topanga Canyon to the project site.
3. Wildlife corridors should be studied, maintained, and encouraged.
4. Two points of ingress and egress to the 211 residences in Part A is mandatory. An emergency exit through winding roads creates a fire trap. How many other residences will also be using that emergency exit? These roads are narrow, treacherous, unpaved in places, and unable to safely accommodate two way traffic especially if one of the vehicles is a fire engine.
5. The sound from the freeway will reverberate through the Canyon. Construction should provide for extra sound proofing.
6. If the proposed grading reduces the hills and ridges which act as a noise buffer, this could cause more noise to reach existing houses. Any grading plan must take acoustics into consideration, including acoustics to existing houses not part of this project.
7. The grading plan must comply with the recent Scenic Corridor plan and Footnote 4 and Footnote 7 of the community plan. These footnotes are attached.



Maya Zaitzevsky  
Re: Canyon Hills Project  
September 24, 2002  
Page 2

8. Grading should be balanced on site.
9. Lot averaging should not be allowed. The recently completed Premier homes have pads which are too narrow and small and make the houses too close together. In order not to block views, the houses should comply with standard side yards and standard requirements that second stories have an additional offset from the property line. This will protect the views of the prominent ridgelines from the new houses.
10. The area which is included to determine the number of allowed structures should not include the drainage easement condemned and paid for by Cal Trans as part of the construction of the 210 freeway. Alternate calculations of slope density and numbers of lots should be made which exclude the drainage easement property as part of the calculation.
11. The lots in Part B have an equestrian park but none of the lots are equestrian. They do not meet the equestrian lot requirement of a minimum of 20,000 square feet with a clear pad for the keeping of horses. The plan should provide an alternative which would require the lots in Part B to be equestrian lots in size and configuration.
12. Any transfer of property to the Santa Monica Mountains Conservancy must provide annual payments to that agency to maintain the property and provide for the construction and maintenance of trails. Such funding must come from the developer until the project is finished in 2009 and thereafter by the homeowners associations. This will allow for the environmental quality to be retained.
13. What is the effect of the 200 foot brush clearance requirement of the City of Los Angeles on the sensitive habitat, especially that in part B which is so sensitive that it must be crossed with two bridges to avoid the riparian habitat? No home should be built closer than 200 feet to the sensitive habitat as the mandatory brush clearance may destroy such habitat.
14. One alternative should provide that density transferred from minimum lots must not be less than 40,000 square feet. Small lots should not be allowed to be averaged into the number of lots allowed.
15. In Part A, when grading is complete new houses viewed from the 210 Freeway must be configured so as to protect the view of the prominent ridgeline from the scenic highway.
16. In Part B the houses should be limited in height and location so as not to obstruct the view of prominent ridgeline from La Tuna Canyon Boulevard.

Maya Zaitzevsky  
Re: Canyon Hills Project  
September 24, 2002  
Page 3

17. All houses must be on sewer lines and the location of those lines and the capacity must be established.
18. The impact on community services such as schools, police and fire must be reviewed. This project is in a mountain fire district and may require the building of a new fire house to serve this area since the travel time from the existing fire station to the normal entrance is very far away. ~~Also schools are already impacted.~~ The mere payment of money to LAUSD will not solve the overcrowding issues. The project should discuss providing sufficient funding for a new grammar school and a new middle school.
19. The traffic effects of all houses including trips to and from school, work and the grocery store should be studied including the almost certain increased traffic onto Big Tujunga Canyon Boulevard and other streets which lead to local shopping centers and grocery stores.
20. While access to the 210 Freeway is close, the nearest access to the 5 Freeway is down La Tuna Canyon which is a winding, twisting road which vacillates from 1 to 2 lanes. The developer should be required to fully improve La Tuna Canyon to two lanes in each direction.
21. Perhaps the second point of ingress and egress to Part A is a bridge to span the 210 Freeway so as to connect Part A and Part B. I believe this was allowed when Cal Trans condemned the property. This would also allow the horses from the equestrian park to have access to the portion of Part A which is to remain open space.
22. Stop signals should be installed at the 210 off ramp. Exiting the Freeway is dangerous because of the curved nature of the road.
23. Every part of this project currently requires lots to be at least 17,500 square feet while most only allow 2 houses per five acres. No lots under 17,500 square feet should be permitted. RE 11 and RE 9 lots will lead to lots being too small in relationship to the current zoning.
24. The possible requirement of streambed alteration permits and 404 permits indicates very sensitive areas. The full extent of these riparian habitats need to be addressed in relationship to the project including what effect the water from the Cal Trans drainage easements have on this habitat.

Maya Zaitzevsky  
Re: *Canyon Hills Project*  
September 24, 2002  
Page 4

If you have any questions, please do not hesitate to contact me.

Very truly yours,



William E. Eick

cc: Honorable Wendy Greuel  
Dale Thrush  
Mary Meyers - California Department of Fish and Game  
Paul Edelman - Santa Monica Mountains Conservancy

**SUNLAND-TUJUNGA-LAKE VIEW TERRACE-SHADOW HILLS-EAST LA TUNA CANYON**

**MAP FOOTNOTES**

1. Boxed symbols denote the general location of a potential facility. The symbol does not designate any specific property for acquisition.
2. Location of Equestrian Trails are general and may be varied as required. Trails shown on private property are contingent upon approval of the property owners. The Plan does not intend that such property be purchased by the City.
3. The Public Facility (PF) planning land use designation is premised on the ownership and use of the property by a government agency. The designation of the PF Zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency officially determines that a property zoned PF is surplus, and no other public agency has indicated an intent to acquire, and the City is notified that the agency intends to offer the property for sale to a private purchaser, then the property may be rezoned to the zone(s) most consistent within 500 feet of the property boundary and still be considered consistent with the adopted Plan.
4. Densities shall not exceed that which would be permitted using the slope density formula in LAMC Section 17.05C for lots: (a) in areas of steep topography planned for Very Low I, Very Low II and Minimum density; and, (b) which would otherwise require extensive grading, involve soil instability erosion problems or access problems, as determined by the Deputy Advisory Agency.
5. Minimum density residential uses are permissible on privately-owned open space.
6. Desirable Open Space is land which possesses open space characteristics which should be protected and where additional development controls such as proposed in the Open Space Plan are needed to conserve such characteristics. These lands may be either publicly or privately owned.
7. Subdivision in steep hillside areas shall be designed in such a way as to preserve the ridgelines and the steeper slopes as open space, limit the amount of grading required, and to protect the natural hillside views. The total density allowed over the entire ownership shall be clustered in the more naturally level portions of the ownership. Density in the clusters shall not exceed that permitted in the Low density housing category for areas that are not in "K" Districts, and shall not exceed that permitted in the Very Low I category for areas that are within a "K" District.
8. Mt. Gleason Avenue north of Foothill Boulevard, Wentworth Street between Mt. Gleason Avenue and Tujunga Canyon Boulevard, Tujunga Canyon Boulevard between Wentworth Street and Apperson Street, and Mountair Avenue between Foothill Boulevard and La Tuna Canyon Road are designated "Modified Collector" streets and shall have roadways no greater than 50 feet in width.
9. Local streets and freeways are shown for reference only.
10. Areas designated Low Medium II are limited to density no greater than that permitted in the RD2 Zone.
11. Sunland Boulevard should be limited to "Secondary Highway" standards.
12. Landfills and surface mining are prohibited in "Ecologically Important" areas until the year 2025.
13. It is the intent of this Plan that multiple residential zoning not be permitted at this location.

14. Equinekeeping "K" Districts are for the purpose of fostering the preservation of horsekeeping areas. These districts should facilitate the keeping and riding of horses through the minimization of sidewalks and the provision of separated riding trails connected to equestrian centers.
15. Development located between the Sunland-Tujunga-Lake View Terrace-Shadow Hills-La Tuna Canyon Community Plan boundary line on the south, the DWP right-of-way on the northeast, and Sunland Boulevard on the northwest having a natural average grade of 2:1 or steeper shall be limited to Minimum Density.
16. Height District No. 1VL
17. Height District No. 1L
18. Existing mobilehome parks are consistent with the Plan. Future mobilehome parks shall be consistent with the Plan when developed in the RMP Zone.
- ~~19. There shall be no grading of the principal ridge lines within the Plan boundaries. Designation of principal ridge lines shall be determined by the Advisory Agency.~~
20. Development should be limited to no greater than that permitted by the RD5 Zone and shall be detached housing. Slope density regulations shall apply to areas of this site having a 15% or greater slope.
21. The location and improvement of Big Tujunga Canyon Road from Oro Vista Avenue to Foothill Boulevard, presently shown along the southeast boundary of the Tujunga Wash, shall be determined by the final determination of CPC Nos. 96-0243 CU and 96-0241 CUB or its successor.
22. In Equinekeeping "K" District lots shall be 20,000 square feet or larger in size for new subdivisions or parcel maps.
23. Each Plan category permits all indicated corresponding zones as well as those zones referenced in the Los Angeles Municipal Code (LAMC) as permitted by such zones unless further restricted by adopted Specific Plans, specific conditions and/or limitations of project approval, Plan footnotes or other Plan map or text notations.

Zones established in the LAMC subsequent to the adoption of the Plan shall not be deemed as corresponding to any particular Plan category unless the Plan is amended to so indicate.

It is the intent of the Plan that the entitlements granted shall be one of the zone designations within the corresponding zones shown on the Plan, unless accompanied by a concurrent Plan Amendment.

*All apply except 19.*

Michèle Stone  
7354 Verdugo Crestline Drive • TUNJUNGA CA 91042

Phone 818-353-2422 • Fax 818-353-1012 • micheledale@earthlink.net

September 24, 2002

Maya Zaitzevsky, Project Coordinator  
200 N. Spring Street, Room 763  
Los Angeles, CA 90012

EAF NO: ENV-2002-2481-EIR

PROJECT NAME: Canyon Hills Project

RECEIVED  
CITY OF LOS ANGELES

SEP 26 2002

ENVIRONMENTAL  
UNIT

A ~~Public Scoping Meeting~~ was held on September 23, 2002 at the Sunland Tujunga Municipal Building regarding a proposed development in Sun Valley, Sunland and Tujunga. My individual testimony will follow in a separate letter, but I'm communicating to you several comments by community members who attended this meeting.

Some questioned how the meeting was conducted and feel the necessity to personally involve CD2 Councilmember Wendy Greuel to insure a fair procedure.

1. They felt Planning did not allow adequate time to address all participants' concerns about the permit process concerning the development.
2. They think Planning didn't allow adequate time for the developer to address the audience with their proposal and to answer questions.
3. They thought it was unfair to limit the first participants to 3 minutes speaking time and the last group only 2 minutes. If this scoping session was to obtain public input in the scoping process, which is the intention of the meeting, Planning was limiting the scope of public input. (Since this meeting concerned several Planning Areas, many in attendance learned new information that other residents were concerned about, which should be included in the EIR from additional meetings).
4. It seems apparent that there will need to be yet another EIR public Scoping Meeting to address these and other issues.

I communicate this to you in the spirit of cooperation and hope to have a productive working relationship with you.

Kind Regards,



Michele Stone

September 23, 2002

City of Los Angeles  
Dept. of City Planning  
200 No. Spring St. Room 763  
Los Angeles, Calif. 90012

Maya Zaitzevsky  
Project Coordinator

I am writing about the proposed project at 8000 La Tuna Cyn. Rd for the building of 280 homes. I am afraid we are going to lose our rural setting and zoning for horse property that we now have. We do not want ANY zoning changes. In the past we have had this problem only to be told that the new homes built will conform to the zoning and almost on every occasion once the homes are built the new owners are complaining about the traffic on La Tuna Cyn Rd.. and about the horses, the dust and everything else that goes along with being in horse property. Changing the zoning only allows more of this to happen.

As it is now, there is so much traffic on La Tuna Cyn. Rd. at times, that residents have to wait 5 minutes for a break in the traffic to get out of their own driveways. In addition to the traffic it will increase pollution from emissions as well as noise pollution.

We as home owners hope you do not allow this project to go forward.

  
Blaine Sutliff  
10514 La Tuna Cyn. Rd.  
Sun Valley, Calif. 91352  
818-767-4265

RECEIVED  
CITY OF LOS ANGELES

SEP 26 2002

ENVIRONMENTAL  
UNIT

SEPT 18, 2002

MAYA ZAITZEVSKY  
PROJECT COORDINATOR  
200 NORTH SPRING ST.  
ROOM 763  
LOS ANGELES, CA 90012  
TEL 213/978-1355

Mrs Milton D Cushman  
9522 Revere Rd  
Tujunga CA  
91042

RECEIVED  
CITY OF LOS ANGELES

SEP 24 2002

ENVIRONMENTAL  
UNIT

REF EAF-2002-2481-EIR  
PROJECT NAME: CANYON HILLS PROJECT

DEAR MR ZAITZEVSKY

I RECEIVED YOUR LETTER NOTICE (DATED 9-6-02) AND MAPS AND AFTER SERIOUS REVIEW AND EVALUATION OF THE PROPOSED PROJECT AT ADDRESS LOCATION: 800 WEST LA TUNA CANYON RD THAT I CANNOT ENDORSE THIS PROJECT BECAUSE OF THESE ENVIRONMENTAL IMPACTS: AESTHETICS, AIR QUALITY, BIOLOGICAL RESOURCES, CULTURAL RESOURCES, GEOLOGY & SOILS, HAZARDS AND HAZARDOUS MATERIALS, HYDROLOGY/WATER QUALITY LAND USE & PLANNING, NOISE, POPULATION/HOUSING PUBLIC SERVICES, RECREATION, TRANSPORTATION TRAFFIC, & UTILITIES/ENERGY CONSERVATION.

I WISH TO STATE THAT I AM AGAINST PROPOSED PROJECT CANYON HILLS PROJECT EAF-2002-2481-EIR

KINDEST REGARDS,  
Milton D Cushman  
Home owner & TAXPAYER

FILE COPY



**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207



September 23, 2002,

**RECEIVED**  
CITY OF LOS ANGELES  
SEP 26 2002  
ENVIRONMENTAL  
UNIT

Ms. Maya Zaitzevsky, Project Coordinator  
Department of City Planning, Environmental Review Section  
City of Los Angeles  
200 North Spring Street, Room 763  
Los Angeles, California 90012

**Canyon Hills Project-Verdugo Mountains  
Pre-Draft Environmental Impact Report Comments  
ENV-2002-2481-EIR**

Dear Ms. Zaitzevsky:

The Santa Monica Mountains Conservancy (Conservancy) owns 1,100-acre La Tuna Canyon Park located directly across La Tuna Canyon Road from the proposed 887-acre project. In the greater context, the Conservancy and the California Department of Parks and Recreation are committed to developing an ecologically sustainable open space park in the Verdugo Mountains. The Draft Environmental Impact Report (DEIR) for the subject project must address the compatibility of the proposed project with both La Tuna Canyon Park and the overall development of a contiguous regional open space park in the range. For example, how specifically would the project affect the viewshed from the Conservancy's existing park?

The Verdugo Mountains comprise a 15-square-mile block of urban wilderness that provides regionally significant educational, ecological, recreational, scientific, watershed, and visual resources. The Draft Environmental Impact Report (DEIR) for the subject project must fully disclose how the proposed project, and each of its DEIR alternatives, would irreversibly diminish these resource values of the Verdugo Mountains.

The ecological and visual significance of the subject property warrant the inclusion of a detailed constraints analysis in the DEIR. Only with such an ecological and visual constraints analysis can decision makers understand the complexity of developing the subject property.

**Inter and Intra-Mountain Range Habitat Linkages**

The DEIR must address how the portions of the Verdugo Mountains ecosystem on both sides of the 210 Freeway contain the full range of mammalian predators found in the

adjacent San Gabriel Mountains with the exception of black bears. The medium and long term sustainability of these sub-populations of predators—such as grey fox, mountain lion, bobcat and American badger—is unknown. The proposed project would irreversibly sever the northwestern corner of the mountain range from the core Verdugo Mountains habitat area. The DEIR for the subject project must fully disclose how the proposed project, and each of its relevant DEIR alternatives, would fragment the mountain range and how such fragmentation could adversely affect the sustainability of native mammalian predators.

The DEIR must examine how the proposed project, and any relevant DEIR alternative projects, could effectively sever the portion of the Verdugo Hills ecosystem located north of the 210 Freeway and west of the proposed development from the remainder of the mountain range. In addition, the DEIR must examine how the proposed project, and any relevant DEIR alternative projects, would block, or greatly restrict, wildlife movement between the habitat near the southeast intersection of Sunland Boulevard and the 210 Freeway. Our analysis shows that this corner of the Verdugo Mountains provides the only viable wildlife corridor for the targeted mammalian predator species, and mule deer, to move between the range and the San Gabriel Mountains via the Big Tujunga Wash. It appears, as currently configured, the proposed project would effectively sever all remaining portions of the Verdugo Mountains (on both sides of the 210 Freeway) located northwest of the proposed development.

The most obvious existing structure that allows night time wildlife crossing under the 210 Freeway in the La Tuna Canyon Road undercrossing. The DEIR must examine how the proposed project, and any relevant DEIR alternative projects, could adversely affect wildlife movement potential through this underpass. For example will the proposed entrance road to the project require night lighting? How would the signalization, hardscaping, landscaping, and signage required by the project entrance adversely affect wildlife movement under this underpass.

The DEIR must also address the full range of other existing, and potential, undercrossings for wildlife to move across the 210 Freeway in the Verdugo Mountains. For example, there supposedly is a culvert under the 210 Freeway located in the southwestern quadrant of Section 24 of the Burbank Quadrangle USGS topographic map. This culvert coincides with a USGS blue line stream and supposedly provides some functionality as a wildlife crossing. The proposed project, and any alternative project on the north side of the 210 Freeway that requires access from La Tuna Canyon Road, would sever habitat connections on the north side of this culvert.

#### **Inclusion of Specific "Reduced Footprint-210 Viewshed Protection" Alternative**

The DEIR should include a reduced footprint alternative project that limits all development to the following two defined clusters. The first cluster, located north of the 210 Freeway, would include all lots shown in the proposed project north of the Southern California Edison transmission line along with all those lots shown to border the southern boundary of the transmission line. The second cluster, located south of the 210 Freeway, would include approximately fifteen lots shown in the proposed project in the southwest corner of the 887-acre project site. These lots would have a single means of access defined by the westernmost access point along La Tuna Canyon Road shown for the proposed project.

### **Fuel Modification Impacts**

The DEIR must address both the potential ecological and visual impacts of the proposed project, and any relevant DEIR alternative projects, of fuel modification and brush clearance on the project perimeter. The representation of open space acreage in the DEIR must distinguish between open space that would remain entirely undisturbed, would just be thinned, would contain only existing native plants, and that which would be irrigated and contains some non-native plants. The DEIR should also disclose how much of the entirely undisturbed open space is isolated by the combination of the project's road system, the 210 Freeway, existing roads, and those proposed by the adjacent Duke Project.

The subject property contains a long interface with existing homes sites. The DEIR must include adequate analysis of the required amount of brush clearance on proposed public open space lots. That analysis is important to understand the permanent annual maintenance costs of any public open space dedication.

### **Growth-Inducing Impacts of Secondary Access Road to Duke Project**

The DEIR must disclose how the proposed access road to the approved Duke Project (VTTM 48754) would increase the potential for that project to be constructed. The DEIR must also specifically disclose how the subject access road could benefit the Duke project.

### **Impacts of Proposed La Tuna Creek Bridges**

The portion of La Tuna Creek proposed to be bridged by the project is one of the most remote and ecologically significant riparian corridors in the western half of the Verdugo Mountains. The resources of this riparian corridor are fundamental to the home ranges of many species and to other species that depend solely on riparian habitat. The proposed bridges and their associated lighting will adversely affect this riparian corridor. The DEIR must analyze these impacts and the benefits of DEIR alternative projects that either eliminate both or one of these bridges.

### **Disclosure of Easements**

Department of City Planning, Environmental Review Section  
Canyon Hills Project - Pre-Draft Environmental Impact Report Comments  
September 23, 2002  
Page 4

The DEIR must disclose, in detail, all access and utility easements that exist on the subject property that benefit any other properties. The DEIR should include a figure that plots these easements on a USGS topographic map base. The DEIR must address how any such easements could effect development of surrounding and nearby properties.

The City of Los Angeles parcel data shows a public right of way that branches to the northwest from La Tuna Canyon Road and then parallels La Tuna Canyon Road for several thousand feet. The proposed project shows two access road bisecting this right of way. The DEIR must disclose the nature of the applicant's easements across this right of way. When were these easements obtained. How wide are they and are there conditions associated with them? If the obtainment of such easements is required as part of the approval process, the DEIR should disclose the rights of the City to deny access across the rights of way.

Please direct any questions to Paul Edelman, Deputy Director for Natural Resources and Planning, at (310) 589-3200 ext. 128

Sincerely,



MICHAEL BERGER  
Chairperson

# Lisa Gelber & Associates

7214 FLORA MORGAN TRAIL  
TUJUNGA, CA 91042-3006

TEL : (818) 352-6679  
FAX: (818) 896-6577

September 30, 2002

Maya Zaitzevsky, Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES  
OCT 01 2002  
ENVIRONMENTAL  
UNIT

Re: EAF NO: ENV-2002-2481-EIR  
PROJECT NAME: Canyon Hills Project

Dear Ms Zaitzevsky,

***Regarding the proposed new development in my neighborhood.***

I grew up and live in the Sunland/Tujunga area, my family has lived here for longer than most, my Mother's parents moved to Sunland in 1920 (give or take a couple years) and lived there the remainder of their lives. I mention this bit of family history so you'll know I love the area and feel it is a special small town within a huge city.

My concerns regarding this development are as follows.

1. I purchased my home because of its rural setting, the unique wild life and it's private yet open location. This is a very unique place, many of the homes in the foothills (including mine) are not fenced allowing the wild animals to quietly move thru the hills. My greatest fear is if the development is allowed to proceed the wildlife will be gone forever. The small amount of native habitat will not be enough to sustain even a meager population and surely not the variety of animals that now frequent the area.
2. Many of the existing birds are shy creatures and if they notice someone trying just to get a glimpse of them they leave for several months. With the constant noise and commotion of a development that will span over several years I fear they will abandon the area entirely.
3. My next huge concern is rain water runoff and how grading, reshaping, and especially paving (and roofs) will effect the natural runoff flow, the rivers and streams, and the long term effect on them, and eventually on the water table. As I stated earlier I have lived in the area my entire life and remember the massive flood in 1969, and in the early 70's there was again flooding as a result of the 210 freeway construction, several families lost their homes and property. This new construction will cause added runoff that the current flood basins are not equipped to handle (especially in La Tuna Canyon).

# Lisa Gelber & Associates

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4. In La Tuna Canyon there are several hiking trails that go through ravines and crevices in the mountains, they are so beautiful and untouched. These things will be gone forever. Again I am worried about the lasting affect if changing this treasure.
5. The streets are old, narrow, some are unpaved, most of the streets do not have sidewalks, and overall are not equipped or capable of handling any added volume of cars and pedestrians. There is no room to widen most the streets unless homes are removed, and then most of the streets are on hilly terrain with steep mountains on one side and cliffs on the other side. The added traffic will also add to the noise through the canyons.
6. When I first became aware of this development proposal I asked where the main access to the houses would be and was told it would be on the La Tuna Canyon side of the development. This makes no sense because the homes would use the schools on the Sunland/Tujunga side of the mountain. The drive around the mountain to drop off kids at school or to shop or run any other house hold errands would be unbearable for those new residents, and add to the already congested local traffic, and at the peak travel times.
7. In the proposal the existing streets (Hillhaven for example) are supposed to be used for emergency purposes only, I have a real concern how this will work, and that at some point these emergency access streets would be opened up as regular city street. Again the noise, volume of traffic on a relatively quite residential street.
8. I question the adaptability of the roads and other services in this neighborhood for this type of development.
9. Are these new homes going to be on sewers? What is the impact of the additional waste if on sewers or septic tanks? What is the contingency plan if something goes wrong?
10. I spend many nights outside looking at the stars from my yard, it is spectacular, with this development will bring street lights, house lights, porch lights, and lights from vehicles. How will this affect the ability to star gaze, and again the birds in the area.
11. The schools in the neighborhood are old (they were old when I went there 30 - 40 years ago) and are already over crowded. There must be something done to accommodate added students and the traffic they would bring to the rest of the

# Lisa Gelber & Associates

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TUJUNGA, CA 91042-3006

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Sunland/Tujunga Community not only those of us who live in the adjacent properties.

12. I was also told these would be big homes with at least a 3 car garage. Multiply every house by 3 cars, that's a lot of added traffic in a tiny community, and onto La Tuna Canyon Blvd. La Tuna Canyon Blvd is a street that already has it's share of deadly accidents, the added homes would most surely increase the number of these incidents.
13. The map of the development does not have any area for the wild animals to move from one undeveloped area to another and this is a huge concern. There are no hiking, biking, or horse trails through the area.
14. The map of the area does not clearly show where the current native streams are and what will happen to them.
15. The map of the development does not show the terrain clearly and so it is difficult to envision what the new home development would look like. I believe that most of the home owners purchased in the hills because of the lack of track homes and the rural feel the area has, how will this change these things. Additionally a huge reason for buying in the area is the lack of noise. It is a very quiet area with the most sounds coming from the wild life, these things would be changed forever.
16. There are many earthquake faults in the area, what effect will moving and grading and any other means of reshaping the hills have with regard to the stability of the area and the new and existing homes?
17. I have a concern about the noise, the dirt and the dust that will be created over the several years that is planned for the construction of the new homes, not only as it affects me but again how it will affect the native animals.
18. Security is also a big concern, in the area I live in it is rear to see a police car, my house alarm went off and the police showed up 13 hours later. This is potentially a huge problem when there will be new easy access from the 210 Freeway and La Tuna Canyon.
19. Will the Fire and Police Departments be able to handle the added burden of responding to the new development?
20. What happened to the legislation to protect the area along the 210 freeway?

# Lisa Gelber & Associates

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7214 FLORA MORGAN TRAIL  
TUJUNGA, CA 91042-3006

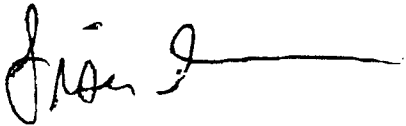
TEL : (818) 352-6679  
FAX: (818) 896-6577

Thank you for considering my concerns.

Please take the time to personally drive through our neighborhoods, and visit the nature walks in La Tuna Canyon (especially the one ½ way between the La Tuna Canyon 210 off ramp and the homes on the south side of the freeway) to get a feel of the area and I'm sure you will come to understand how I feel.

Any questions or comments please feel free to call or email. 818 352-6679 or [lisa.gelber@verizon.net](mailto:lisa.gelber@verizon.net)

Thank You,

A handwritten signature in cursive script, appearing to read "Lisa Gelber", followed by a long horizontal line extending to the right.

Lisa Gelber



Dale Echnoz • Michèle Stone  
7354 Verdugo Crestline Drive • TUJUNGA CA 91042  
Phone 818-353-2422 • Fax 818-353-1012 • micheledale@earthlink.net

---

September 26, 2002

Maya Zaitzevsky, Project Coordinator  
Department of City Planning  
200 N. Spring Street, Room 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES  
SEP 30 2002  
ENVIRONMENTAL  
UNIT

Dear Ms. Zaitzevsky,

RE: Notice of Pre-Draft Environmental Impact Report Request for Comments  
EAF No: ENV-2002-2481-EIR

Since this project will impact a much larger area than the proposed scope I ask that in addition to the 500-foot radius, Planning also notify community organizations in the affected communities. The project is along the 210 Foothill Freeway, a major regional thoroughfare and a Scenic Corridor designated by the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. Future notifications should include:

Sunland Tujunga Neighborhood Council  
Foothill Trails Neighborhood Council  
La Tuna Canyon Community Association  
Valley Horse Owners Association  
Shadow Hills Homeowners Association  
Lake View Terrace Homeowners Association  
Sun Valley Neighborhood Improvement Organization.

If you require contact information, CD2 staff can assist.

Also, notifications should be given to the Los Angeles Times Valley Edition, the Daily News and our local newspaper:

The Foothill Sentinel  
10762 Sherman Grove  
Sunland, CA 91040

At the September 23<sup>rd</sup> Scoping Meeting it was apparent that many of the attendants didn't understand the planning process. Planning should have another public meeting, forthwith, to educate residents about the EIR and permit process. Perhaps you could also mail out a flow chart of these processes with projected minimum time frames.

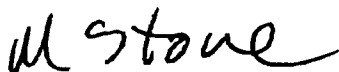
Another Scoping Meeting should be held since at the September 23<sup>rd</sup> meeting Planning limited public input by not allowing adequate time for speakers to comment and the attendants felt there was not enough dialogue with the applicant's representatives.

The DEIR should include, but not be limited to:

- Existing wildlife habitat and plant communities; wildlife corridors; migratory, estivating, hibernating and dormant species and any effects this project will have on the general ecosystem of the region.
- Traffic surveys that address the impact on current and future residents, especially with regard to La Tuna Canyon Boulevard, the 210 Foothill Freeway and all possible emergency fire access roads.
- Hydrological and economic analysis of what modifications will occur to the existing watershed, the San Fernando Valley aquifer and LA City water system, what any additional urban runoff will occur, and specifically how this would relate to flooding and hydroplaning in downstream communities such as Sun Valley and La Tuna Canyon.
- How this project relates to the General Plan, the Specific and Community Plans of the target area, the Hillside, Slope Density and Oak Tree ordinances and other regional plans such as the one that concerns adjacent parks in La Tuna Canyon recently preserved by the Santa Monica Mountains Conservancy.
- Detailed explanation of the history and rationale of the existing zoning of the site and projected impact of any proposed zone change.
- Discussion of how much open space will be preserved, its exact location and who will govern it.
- Location of the project in relationship to known and inferred earthquake fault zones, debris flows and landslide areas and evaluation of any possible slope failure.
- Applicability of all current and pending Federal, State, County or City legislation that would concern this project. Identification of any area or regional Boards or Commissions who have relevant authority in this matter.
- Matters relating to noise, lighting, pollution, particulate matter, changes in the microclimate and regional climate, wind patterns and pesticides.
- Electromagnetic Fields effects, since the SCE power line bisects part of the property.
- Infrastructure improvements required: including utilities, roads and public schools, and estimated costs.
- What the effect of existing upstream septic tanks and cesspools will be on this project.
- Archaeological, Paleontological and Historical resources of the site and impacts to the adjacent historical landmarks.

We hope that both the Planning Department and the applicant's Consultant, Christopher Joseph and Associates, will not only incorporate all community input into this EIR but also widen the scope to consider the relationship between this project and the general Southern California region. There are many issues of transportation, housing, air quality, education, public safety, and recreation that need to be addressed in a coordinated fashion between all local agencies, and I hope you will take this into consideration.

Sincerely,



Michèle Stone

Cc: Wendy Greuel, Councilmember District 2  
Dale Thrush, Chief Planning Deputy District 2  
Dan Scott, Planning Department, North Valley  
Mitchell Menzer, City Planning Commission President  
Sandor Winger, North Valley Area Planning Commission President



ANGELES CHAPTER • SIERRA CLUB

3435 WILSHIRE BOULEVARD • SUITE 320 • LOS ANGELES • CALIFORNIA 90010-1904 • (213) 387-4287 • FAX (213) 387-5383

September 25, 2002

Ms. Maya Zaitzevsky  
Project Coordinator  
Department of City Planning  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

SEP 27 2002

ENVIRONMENTAL  
UNIT

Dear Ms. Zaitzevsky,

RE: Notice of Pre-Draft Environmental Impact Report Request for Comments  
EAF No.: ENV-2002-2481-EIR

The Sierra Club has reviewed the Pre-draft Environmental Impact Report Request for Comments and appreciates this opportunity to review and comment on the scope of the above referenced project's Draft Environmental Impact Report (DEIR).

To insure the adequacy of the DEIR, we recommend that the document include:

1. A thorough and accurate project description including the project concept, construction activities, build-out assumptions, conceptual drawings, and reasonably foreseeable future phases. This project description should include a list of approvals for which the EIR will be used, as well as a list of the related environmental review and consultation requirements required by federal, state, or local laws, regulations and policies.
2. Clearly written project objectives which will enable the lead agency to develop reasonable alternatives and aid decision makers in preparing findings or a statement of overriding considerations, if necessary. These objectives should be publicly discussed and agreed-upon.
3. Thresholds and levels of significance should be clearly defined and stated in the EIR. This will help in determining if mitigation or the degree of mitigation is necessary for project impacts.
4. An explanation of how the proposed project conforms or does not conform to the recently passed amendment to the Los Angeles City General Plan, San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan.
5. An explanation of any other non-compliance with Los Angeles City Ordinances by this project such as any ordinances regarding slope density and hillside building.
6. Besides the Project and No Project alternatives that should be fully discussed in the EIR, there should be at least one other alternative. This alternative should fully discuss the impacts of a development conforming to the current zoning for the properties, Very Low I Residential, Very



Low II Residential, A1 Agricultural, and RE11 Residential Estate, conforming to the recently passed San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, and conforming to any Los Angeles City slope density and hillside ordinances. This alternative is very important as a benchmark comparison of the present proposal to what is currently allowed. This alternative would be important for the Planning Department to make an informed recommendation, each of the City Commissions that further review the project, and City Council who will make a decision on this project.

7. An analysis of the policy and planning context in which the project is proposed, including a discussion of the inconsistencies between the proposed project and the City's general plans and any regional plans such as parkland preserved by the Santa Monica Mountains Conservancy in the adjacent part of La Tuna Canyon.
8. A thorough and accurate assessment must be made of all oak trees regardless of size as the developer would be mitigating the destruction or removal of oaks from the site.
9. A discussion in the EIR must include how the proposed open space be preserved. Who will own the proposed open space if a development is made? How will this open space be maintained and preserved from future development or destruction?
10. The EIR must discuss problems that will be specific to this project such as shielding freeway noise from residents of this proposed development.
11. The EIR must discuss the cumulative effects of all proposed or planned projects in the region and identify all private holdings in the Verdugo Mountains as possible development areas. The EIR should identify all other holdings that the applicant, the applicant's associates, and parties or entities related to the applicant hold in the Verdugo Mountains as areas for future projects.
12. The EIR must include a discussion on wildlife corridors and how the project will impact the regional ecosystem.
13. Wildlife surveys should be done at the appropriate time of year when plant and animal species would be found rather conduct surveys at times that it would not be likely to find these plants and animals.
14. The EIR should be clearly written and understandable by the general public.
15. The EIR should include traffic surveys that are meaningful and relevant to the likely number of trips and vehicles that these residents of the proposed development would be driving.
16. Any simulations, photo renderings, or other models of the project would be realistic showing the impact of grading, filling, buildings, vegetation removal and any other changes that are proposed by this development.
17. The EIR must clearly disclose any assumptions, estimates, and assertions used in preparation of this document.



18. The EIR must clearly state the times and dates that any surveys or fieldwork was done for both on or offsite work. Also, outside consultants that may do survey or fieldwork must be identified in the EIR.
19. Any mitigation or other project impact minimization be clearly disclosed and part of conditions for granting necessary permits for this project.
20. The EIR must clearly disclose the proposed construction process including the types and numbers of different machines to be used, the likelihood that blasting or explosives may be used as part of the process, and whether there will be an import or export of soil, vegetation, or other features that are currently on site.

The DEIR must include a full discussion on the project and alternatives on the areas of probable environmental impact that are identified in the Pre-draft Environmental Impact Report Request for Comments. These include but are not limited to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Utilities/Energy Conservation.

A section on the impact on local and regional public schools must be included in the DEIR. Additionally, the EIR must include a discussion of the Paleontological resources. The EIR must also include a discussion on the impacts of Electromagnetic Fields as a major powerline bisects part of the proposed development. The EIR must also include a discussion on Archaeological resources if they are not already discussed as part of the Cultural resources discussion. The discussion on Aesthetics must include a discussion on the Visual Resources of the project. This would include but are not limited to how the project looks, light or glare pollution created by the project, altering natural features, obscuring natural features, adversely impacting public view, how the project fits in the natural terrain, and the elimination of natural beauty that currently exists on the property.

To further insure adequacy, the EIR process should include:

1. A meeting (or meetings) of concerned parties to obtain further information as to the scope and content of the DEIR. Such meetings would help address residents concerns about the project and streamline discussion at future public forums such as a public meeting to solicit comments on the DEIR.
2. Ample opportunity for public review and comment of the DEIR.
3. Public comment period of the DEIR of ninety days and notice of the DEIR's release date no less than sixty days before the proposed release.
4. Disclosure of an approximate timeline by the developer when the developer expects to complete each phase of the EIR process.



5. Adequate time for speakers to comment at relevant stages of the EIR process where comments are allowed in a public forum.
6. That at least thirty days be given before future public meetings such as the DEIR and Final EIR comment meetings.
7. A public meeting should be held to educate residents about the EIR and permit process. It was apparent from the Scoping Session held on Monday September 23<sup>rd</sup> that many of the speakers and presumably many of the audience did not know or understand the process. Such a meeting would help the public understand the process and streamline future meetings. If people understood what each stage of the process is about, they would make comments that are more relevant to the particular public forum.
8. All concerned citizens, groups, and civic organizations besides those that are within 500 feet of the proposed development be informed of public events or news concerning this development. Certainly, potential impacts of the project will have an effect on a larger regional and local area than merely 500 feet from the project. Therefore, public notice must be given in local area newspapers that would reach those that are potentially impacted regionally.

We hope that the applicant's EIR consultant, Christopher Joseph and Associates, will be reasonable and fair in incorporating input from the public scoping session and comments submitted during the Notice of Preparation period in the style, form, and content of the EIR.

We hope that the EIR process will be fair to allow adequate public input to make the EIR a useful and meaningful decision making tool, for the City Council and all other city commissions and departments that involved in the process.

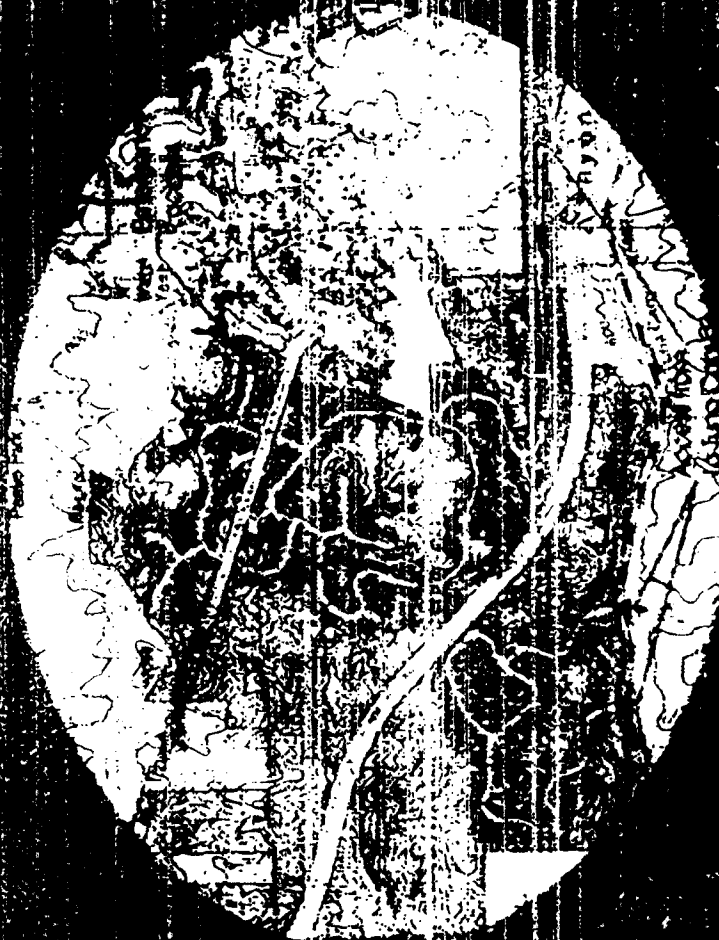
Sincerely,

Fred Dong

Chairman of the Crescenta Valley Sierra Club for the Sierra Club

Cc: John Lajeunesse, Conservation Chair of the Crescenta Valley Sierra Club  
Delphine Trowbridge, Chair of the Verdugo Hills Sierra Club  
David Czamanske, Chair of the Pasadena Sierra Club  
Don Bremner, Conservation Chair of the Pasadena Sierra Club  
Johanna Zeterberg, Conservation Coordinator of the Angeles Chapter Sierra Club

future location of the Canyon Hills Project aka Whitebird Development



Proposed development: orange shading Whitebird property: blue shading

For more information contact: MicheleDale@earthlink.net

## CANYON HILLS PROJECT aka WHITEBIRD DEVELOPMENT

Whitebird is a Texas entity that owns 887 acres in the Verdugo foothills between La Tuna Canyon and Sunland Blvd. A Las Vegas, Nevada developer has been hired to sub-divide the acreage for 280 single-family luxury homes on 246 of the total 887 acres. The development, part of which will be a gated community, will straddle the Foothill Freeway west of the La Tuna Canyon / 210 Freeway crossing, and extend north to the ridge line at Mt. McGroarty. (See map opposite side)

This land is currently zoned agricultural. A-1 zoning permits one house per five-acres which would allow about 50 homes on the 246 acre site. Whitebird plans to construct 280 houses. (The remaining 640 acres Whitebird proposes to be dedicated as open space, presumably because it would be cost prohibitive for profitable development.)

On September 23, 2002 a meeting was held by the L.A. City Planning Department to introduce the proposed project and obtain public input on the scope of the required Draft Environmental Impact Report (DEIR). The next step will be to issue a DEIR, after which there will be a 45 to 90 day period for public comment before the EIR is published.

The project site is subject to numerous land use restrictions including the L.A. City General Plan, Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan, San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, and Hillside Slope Density and Oak Tree Ordinances. The proposed development requires exemption from provisions in these land use regulations. The developer is applying for tentative tract and zone changes, in addition to other permits and plan amendments.

There are both benefits and detriments from this development to Sunland, Tujunga and La Tuna Canyon residents & businesses that need to be addressed. If you did not receive notice of the "scoping meeting" held September 23<sup>rd</sup> by the L.A. City Planning Dept. and want to receive future notifications, please contact:

Maya E. Zaitzevsky  
Environmental Review Section  
Department of City Planning  
200 North Spring Street, Room 763  
Los Angeles, CA 90012  
Mzaitzev@Planning.Lacity.Org  
213-978-1355

Re: Canyon Hills Project  
EAF No: ENV-2002-2481-EIR  
(1-213) 478-1343

If you want to learn more about the LA City planning process, go to their web site:

<http://www.lacity.org/PLN>  
(link to "Processes")

### Additional contact information:

Honorable Wendy Greuel  
Los Angeles City Council, District 2  
200 N. Spring Street, Room 430  
Los Angeles, CA 90012  
213-485-3391

Dale Thrush, Chief Planning Deputy, Dist. 2  
213-485-3391  
dthrush@citycouncil.lacity.org

Pat Davenport, Field Deputy  
Sunland-Tujunga Field Office, District 2  
818-352-3267  
pdavenport@lacity.org

Sunland Tujunga Neighborhood Council  
SunlandTujungaNC@mindspring.com  
(Meets 2nd Wednesday each month at the Elk's Lodge, 10137 Cornerstone Ave, Tujunga)

Foothill Trails Neighborhood Council  
Foothill-Trails-District@wildwildwest.org  
<http://www.foothill-trails.org>  
for meeting times & locations

Canyon Area Preservation  
(Information about preserving our canyons, hillsides and the foothills)  
CAPViews@atlb.net

*"Never doubt that a small group of thoughtful, committed citizens can change the world; indeed it's the only thing that ever has." - Margaret Mead*



# STROOCK

October 7, 2002

Matthew C. Thompson  
310-556-5944  
MThompson@stroock.com

BY FAX NO. (213) 978-1343 AND BY MESSENGER

Maya E. Zaitzevsky  
Project Coordinator  
City Planning Associate  
Environmental Review Section  
200 North Spring Street  
Room 763  
Los Angeles, CA 90012

Re: Project Name: Canyon Hills Project  
Developer: Whitebind, Inc.  
EAF No. ENV-2002-2481-EIR

Dear Ms. Zeitzevsky:

This letter is in response to your letter of September 6, 2002 and the public scoping meeting of September 23, 2002, both regarding the proposed construction of 280 single family homes in the La Tuna Canyon area (the "Project") by Whitebind, Inc., a company owned in whole or in part by Richard Percell and Associates (collectively, the "Developer").

My name is Matthew C. Thompson and I reside with my wife and one-year old son at 8545 La Tuna Canyon Road, Sun Valley, CA 91352. My property is bordered on one side by La Tuna Canyon Road, on another side by the property of Virginia Sloane, and on two sides by the proposed Project. I share several hundred feet of property line with the so-called Equestrian Park (the "Equestrian Park") component of the proposed Project. In fact, the Equestrian Park, as diagramed on the Preliminary Site Plan enclosed with your letter of September 6, 2002, is within twenty feet of my house.

My wife and I purchased our home in 1999 in order to raise our family away from the overcrowding of Los Angeles' urban and suburban sprawl. While we presently have numerous objections to the proposed Project, as requested by your letter and as instructed at the hearing, we will limit our comments to the scope and contents of the Draft Environmental Impact Report (the "EIR").

50190989v1

Maya E. Zaitzevsky

October 7, 2002

Page 2

You'll note that I am a lawyer, but by no means do I specialize in environmental, land use or real estate law. This letter is written as a concerned citizen whose property and family's way of life will be substantially impacted and forever changed by the proposed Project.

**I. Purpose of EIR.** The EIR is "an environmental alarm bell, whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." County of Inyo v. Yorty, 32 Cal. App. 3d 795, 810 (1973). A well-planned and executed EIR "helps insure the integrity of the process of decision-making by precluding stubborn problems or serious criticism from being swept under the rug." People v. County of Kern, 39 Cal. App. 3d 830, 841 (1974). While I am certain that you and your office will be fair and impartial throughout this process, I ask that you bear in mind that those of us opposed to the Project are speaking out as best we can, both on behalf of ourselves and the voiceless environment in which we live.

It is my understanding that your office has contracted directly with the entity preparing the EIR, but that the Developer is paying for the EIR preparation costs. I am concerned that the entity preparing the EIR will feel beholden to the Developer and not the general public as represented in these proceedings by your office. To this end, I ask that you provide me with the name of the entity preparing the EIR, its contact information and a copy of the contract between your office and such entity. In addition, I request that your office remind the entity preparing the EIR of the holdings of the California Court of Appeal in Mission Oaks Ranch, Ltd. v. County of Santa Barbara, 65 Ca. App. 4th 713 (1998) (disapproved on other grounds in Briggs v. Eden Council For Hope & Opportunity, 19 Cal. 4th 1106 (1999)):

- Your office, not the Developer, has the discretion to determine the scope, content, and adequacy of the EIR;
- Your office has no obligation to include information or conclusions in the EIR just because the Developer wants them included; and
- The Developer, even though it is paying for the EIR, is merely an incidental beneficiary of the EIR – the primary purpose of the EIR is to serve the public not the Developer or the Project.

50190989v1

Maya E. Zaitzevsky

October 7, 2002

Page 3

**II. Contents of EIR.** 14 Cal. Code of Reg. Sections 15122 through 15131 sets forth those items that must be included in the EIR. Some of the more important components are discussed briefly below.

A. The EIR must contain a summary of the proposed action which must address in detail each of the following items:

- Each significant effect;
- Proposed mitigation measures or alternatives to reduce or avoid each significant effect;
- Areas of controversy, including issues raised by other agencies and the public; and
- Issues to resolve, including the choice of alternatives and mitigation measures.

B. The EIR must contain a general description of the Project's technical, economic and engineering characteristics and a statement of objectives sought by the Developer. The purpose behind this statement is to allow your office to develop a reasonable range of alternatives.

C. The EIR must include a detailed and accurate description of existing environmental conditions in the Project vicinity from both local and regional perspectives. In particular, the "environmental setting" of the EIR must provide a clear and definite analysis of the location, extent, and character of the resources on and adjacent to the Project site.

D. The EIR must discuss inconsistencies between the proposed Project and applicable general plans and regional plans that have been adopted (i.e., the recently adopted San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (the "Scenic Preservation Plan")).

E. The EIR must discuss all of the Project's environmental effects, including with respect to:

- Relevant specifics of the area;

50190989v1

Maya E. Zaitzevsky

October 7, 2002

Page 4

- The resources involved;
- Changes in the physical environment
- Alternatives to ecological systems;
- Changes in population distribution and concentration and human use of the land (including commercial and residential development);
- Health and safety problems caused by the physical changes;
- Other resources such as water, scenic quality, and public services; and
- Exposure of people and animals to environmental hazards.

F. The EIR must discuss the cumulative impact of the Project in addition to the direct environmental impact of the Project. For example, the impact of the Project should be analyzed in connection with the impact of the so-called Duke Project (VTTM 48754), the project further west on La Tuna Canyon behind the community church, and any other proximate projects. As pointed out by the California Court of Appeal in Kings County Farm Bureau v. City of Hanford, 221 Cal. App. 3d 692, 720 (1990), "one of the most important lessons evident from past experience is that environmental damage often incurs incrementally from a variety of small sources. Those sources appear insignificant, assuming threatening dimensions only when considered in light of the other sources with which they impact. . . . CEQA has responded to this problem of incremental environment degradation by requiring analysis of cumulative impacts."

G. The EIR should discuss economic and social information. For example, will the increase in local population require new schools, firehouses, police substations, etc.

H. The EIR must discuss the impact of the Project on archeological resources.

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**III. Mitigation.** The EIR must discuss all possible mitigation measures, and thoroughly address the impact of each on the Project and the environment. This discussion must address each of the following:

- Avoiding the environmental impact altogether by not taking a certain action;
- Minimizing the impact by limiting the degree or magnitude of the action;
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation or maintenance actions; and
- Compensating for the impact by providing replacement or substitute resources or environments.

Proposals that merely defer mitigation to future studies and their resulting recommendations are unacceptable. Gentry v. City of Murrieta, 36 Cal. App. 4th 1359, 1393-1397 (1995). Similarly, proposals to merely document the importance of a resource prior to its destruction are unacceptable. League For the Protection of Oakland's Historic Resources v. City of Oakland, 52 Cal. App. 4th 896, 909 (1997). Mitigation measures in an EIR must include all feasible measures unless your office determines that a given measure is "facially" infeasible. Los Angeles Unified School District v. City of Los Angeles, 58 Cal. App. 4th 1019, 1028-1031 (1997). With respect to each mitigation measure proposed, the EIR must specify whether or not the environmental impact is being completely avoided or substantially lessened. Rural Landowners' Assn. v. City Council, 143 Cal. App. 3d 1013, 1024 (1983).

Importantly, with respect to each proposed mitigation measure, the EIR must clearly delineate between measures proposed by the Developer and all other measures that could reduce the adverse impact of the Project. 14 Cal. Code Reg. Section 15126.4(a)(I)(A).

**IV. Alternatives.** The EIR must describe and compare all available alternatives to the Project and its location. 14 Cal. Code Reg. Section 15126.6(a). As held by the

California Supreme Court, one of the major functions of an EIR is to ensure that public agencies thoroughly assess all reasonable alternatives to proposed projects. Laurel Heights Improvement Assn. v. Regents of the University of California, 47 Cal. 3d 376, 400 (1988). Moreover, the alternatives section of the EIR is its core. Citizens of Goleta Valley v. Board of Supervisors, 52 Cal. 3d 553, 564 (1988). The alternatives section of the EIR must focus on alternatives that are capable of avoiding or substantially lessening the Project's significant effects, even if the alternatives would impede attainment of Project objectives or be more costly. 14 Ca. Code Reg. Section 15126.6(b).

The alternatives section of the EIR must identify all selected alternatives and identify all rejected alternatives together with the reason for their rejection. 14 Ca. Code Reg. 15126.6(c) and (f). The conclusion that an alternative is infeasible must be supported by substantial, articulated, evidence. City of Fremont v. San Francisco BART, 34 Cal. App. 4th 1780, 1788 (1995). In determining feasibility, your office must consider:

- Site suitability;
- Economic viability;
- Availability of infrastructure;
- General plan consistency;
- Jurisdictional boundaries; and
- Whether the proponent can acquire control, or otherwise access an alternative site.

Most importantly, the EIR must analyze the impact of a no-project alternative. 14 Ca. Code Reg. Section 15126(e). In Goleta, the California Supreme Court established the analysis to be followed in considering an alternative location for the project:

- Determine whether or not any significant effects of the project would be avoided or lessened by selecting an alternative location;
- The feasibility of alternative locations must be evaluated (and, if your office concludes that no feasible alternatives exist, the reasons for such

conclusion must be documented and included in the EIR); and

- Alternative sites will be deemed feasible if they meet any of the following criteria:
  - a. The project proponent owns or controls feasible alternative sites;
  - b. The project proponent has the ability to purchase or lease such properties;
  - c. The project proponent otherwise has access to suitable alternative sites;
  - d. Two or more developers are seeking approval from a local agency for the same type of development at different locations (i.e., the Duke Project); or
  - e. Other circumstances necessitate review of alternative sites; or
  - f. The proposed development is inconsistent with adopted regional/local plans (i.e., the Scenic Preservation Plan).

Finally, the EIR must designate the environmentally-superior alternative even if it is the no-project alternative. 14 Cal. Code Reg. Section 15126.6(e)(2).

**V. General Environmental Concerns To Be Included In EIR.** I am not an environmental specialist. Accordingly, what follows is a layman's list of environmental concerns derived from my time and experiences living in the area impacted by the Project. As an avid horseman and hiker, not to mention resident of the canyon, the following concerns are based on my personal experiences riding and hiking the area impacted by the Project.

A. **Fauna.** In the Project area, I have personally seen deer, skunks, raccoons, squirrels (ground and tree), rabbits, hawks, owls, hummingbirds, quail, numerous other migratory and non-migratory birds, bats, frogs, lizards and snakes. The EIR must include a thorough discussion of the Project's impact on the habitat of these and other canyon animals, including the impact on their migration, reproduction and living areas.

Maya E. Zaitzevsky  
October 7, 2002  
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B. Flora. In the Project area, I have personally seen numerous trees (California oak, scrub oak, red oak, white oak, sycamore, alder, Douglas fir, Monterey pine, other pine, eucalyptus and maple), various bushes, various flowers (including California poppy), ferns, cacti, etc. The EIR must include a thorough discussion of the Project's impact on the habitat of these and other canyon plants.

C. Hydrology Report. There are several seasonal streams that run through the Project. The Project's impact on these streams must be included in the EIR. In particular, the stream that runs through the Project adjacent to La Tuna Canyon Road floods on an almost annual basis. Moreover, this stream flows under the only bridge providing access to my property. Following a heavy rain, the clearance between the surface of the rapidly moving water and the underside of my bridge can be measured in inches, not feet. Any increase in the flow of water (i.e., increased runoff) will wash my bridge out (as well as that of my neighbors). This and the overall impact of grading, bridging and adding runoff to the Project's streams must be analyzed. The stream adjacent to the Equestrian Park is discussed in greater detail below.

D. Fire Hazard. Annually, the residents of La Tuna Canyon greet the fire season with great trepidation. There has not been a major fire in La Tuna Canyon for quiet some time (more than twenty years, I'm told). The time is ripe for another big fire. The EIR must discuss the impact of the Project (both during construction and post-completion) of fire risks in the canyon.

E. Grading. The Project site is filled with peaks and valleys. While few of the peaks (and none of the valleys) are designated as "prominent" in the Scenic Preservation Plan, all will have to be destroyed to complete the Project. The Project will irreversibly change the topography of the Project site. This must be discussed in the EIR. Moreover, the amount of grading contemplated by the Project (multiple cubic tons) will raise a dust cloud for miles around. The environmental impact of all that dust must be analyzed in the EIR.

F. Traffic. La Tuna Canyon Road is a motor speedway in the morning and at night. Throughout the rest of the day, it is busy. The environmental impact of several hundred additional drivers in the area must be included in the EIR. In particular, the increased air pollution, noise pollution, traffic congestion and risk of accident should be analyzed.

G. Light. As someone pointed out at the public hearing, you can actually see the stars from La Tuna Canyon. An analysis of the impact of several hundred

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homes on the quality of night light (or lack thereof) in the canyon must be included in the EIR.

H. Noise. If you have spent any time in the canyon, you know that it acts as a noise funnel. Every sound (music, cars, voices, appliances, etc.) carries throughout the canyon. The environmental impact of several hundred additional homes on noise levels in the canyon must be included in the EIR.

I. Other Projects. Previously, your office has approved other projects in the canyon (i.e., the Duke Project and the project behind the Community Church). The environmental impact of these projects, together with the Project must be considered in the aggregate.

J. Archeological. While I haven't, several of my neighbors have found Native American artifacts in the Project area (arrowheads, pottery shards, etc.). While I don't believe the canyon was heavily populated by Native Americans, a thorough archeological survey of the Project area should be undertaken and an analysis of the Project's impact on archeological resources should be included in the EIR.

**VI. Specific Environmental Concerns To Be Included In the EIR**. The greatest impact of the Project on me and my family is the so-called Equestrian Park. When I discussed the Equestrian Park with Mr. Percell, he indicated that it was not his idea. He indicated that you (or your office) required its inclusion in the Project. As an avid horseman and an owner of two horses, I am all for a public equestrian facility in the canyon. However, the proposed location (next to my house) is not in the best interest of the public or my family. Below, I explain why and propose a far better and infinitely more feasible alternative.

A. Problems With Proposed Site. The proposed Equestrian Park is approximately three acres, less than half of which is flat. That portion which is flat is bordered on one side by my property, on one side by La Tuna Canyon Road, and on a third side by property owned by Cliff Beck. Moreover, the property is bordered on two sides by two different seasonal streams that merge at the corner of the site before feeding into the La Tuna wash.

Annually, both streams tear away at the sides of the area where the Equestrian Park is to be situated. Annually, I do what I can to shore up the sides (which range in height from eight feet to over twenty feet). Annually, I am unsuccessful in protecting the

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equestrian area and more land is lost. It makes little if any sense to commit city or private funds to an Equestrian Park that will disappear in the near future.

Access to the proposed site is across the stream from La Tuna Canyon Road. While the Preliminary Site Plan (enclosed with your letter) shows the Equestrian Park as being adjacent to La Tuna Canyon Road, in fact, it is not. Creating a horse facility would require the construction and maintenance of a substantial bridge (particularly if it is contemplated that horse trailers would have access to the site from the bridge). Why not locate the facility at a similar (or better) site that does not require the bridge? Moreover, the Equestrian Park is directly across from one of the most dangerous curves on La Tuna Canyon Road. Making the turn into and out of the facility, while pulling a loaded horse trailer, would be no less than terrifying.

The site contains numerous mature trees (including oaks, maples, eucalyptus and probably the oldest living sycamore in the canyon). Creating an arena, parking facilities and the like would require the destruction of some or all of these trees.

Finally, one of the reasons this site has been proposed as the Equestrian Park is that it purportedly provides access to equestrian trails in the hills above the canyon. While this is true in a technical sense, it is not true in a legal one. There is only one remotely rideable trail (not for the feint of heart) out of the area of the proposed facility. However, for the first quarter mile (possibly more), it traverses private land owned by Cliff Beck. While Mr. Beck has been kind enough to tolerate the occasional rider in the past, I can't imagine that he will welcome with open arms the general public riding through his property. The only alternative would be to cut new trails through the Developer's existing property, thus substantially increasing the environmental impact of the Project and forcing canyon horse lovers to use new trails that they otherwise would never ride.

B. The Perfect Alternative. Mr. Percell (or a trust controlled by him) owns approximately ten acres of flat, undeveloped land at the southwest corner of La Tuna Canyon Road and the 210 Freeway. This not to be confused with the land that he controls at the southeast corner of the same intersection frequented by Los Angeles' mountain biking community.

The southwest corner would be the perfect location for an Equestrian Park for, among other reasons, the following:

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- It provides direct access to La Tuna Canyon Road. No bridge would be necessary.
- It is comprised of ten usable acres (as opposed to approximately one and a half adjacent to my house). Therefore, there would be ample parking for horse trucks and trailers, not to mention plenty of room for horse facilities themselves.
- The site provides direct access to existing horse trails without having to cross privately-owned property (other than other property already owned by the Developer). I am told that the site even provides access to the horse tunnel that exists under the 210 Freeway connecting the north and south sides.
- There would be no adverse impact (noise, lights, dust, traffic, vandalism, crime, etc.) on me and my neighbors. In fact, there would be no neighbors impacted by the facility.
- The site would not need stabilization to avoid further deterioration from water erosion.
- No trees would have to be destroyed to create the site.
- The site is at a spot on La Tuna Canyon Road that would not be dangerous to access. Trucks towing horse trailers could make the turn without problem or danger.

Notwithstanding the foregoing, you will receive substantial resistance from Mr. Percell if you propose this site as an alternative to the designated Equestrian Park site. Why? Because Mr. Percell intends to commercially develop this alternative site in the future (to me he mentioned a gas station, McDonald's, 7-Eleven and Starbucks). Without engaging in a diatribe as to the inappropriateness of these businesses in the canyon, let me remind you of the California Supreme Court's admonition in Goleta. An alternative site is feasible for a private project if:

- The project proponent owns or controls feasible alternative sites. Mr. Percell does; or

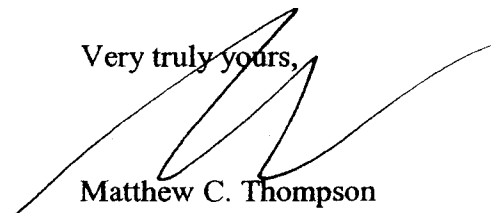
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- The project proponent has the ability to purchase or lease such properties. Mr. Percell doesn't need to since he already controls the alternative site.

The alternative site is better for the general public and my family. A discussion of this issue and the feasibility of the alternative site must be included in the EIR.

**VII. Conclusion.** I appreciate you taking the time to read this rather lengthy letter. I am available to discuss all of the foregoing at your convenience. Please contact me any time at the address and phone number listed above or feel free to call me at home at 818-451-1840.

Very truly yours,



Matthew C. Thompson

MCT:ea

cc: Wendy Greuel (Fax No. 213-680-7895 and by mail)  
Richard Percell

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