

Fred Dong – Canyon Hills EIR Comments

Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. That plan says,

Sec. 2. **PURPOSE.** The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan is intended to preserve, protect, and enhance the unique natural and cultural resources of the Plan area. The Plan accomplishes these goals by establishing four general areas of regulation:

1. *Prominent Ridgeline Protection* measures protect from grading and/or development Designated Prominent Ridgelines that are visible from the Right-of-Way (ROW) of any of the Scenic Highways listed in Section 4.
2. *Biological Resource Protection* measures protect oak trees and help protect unique native plant communities of the Specific Plan area.
3. *Scenic Highway Corridors Viewshed Protection* measures establish standards for site design, landscaping (including parking lot landscaping), and signage to assure that the design of projects and related improvements within designated scenic highway corridors preserve, complement and/or enhance the views from these corridors.
4. *Equinekeeping District Standards, Equestrian Trails, and Domestic Livestock* measures: define minimum standards for subdivisions located within existing and future "K" Equinekeeping Districts within the Plan area; provide for the designation and development of existing and future equestrian trails; re-establish the right of property owners to keep domestic livestock in conjunction with residential uses in the RE40 zone, and protect non-conforming equine uses in "K" Districts in order to preserve the historic use of the area for equestrian and domestic livestock.

The EIR must discuss the project's conformity with the Specific Plan Application of the Scenic Plan. The Scenic Plan enhances the existing Los Angeles Municipal Code. The plan says,

Sec. 3. **SPECIFIC PLAN APPLICATION.**

- A. The regulations of this Specific Plan are in addition to those set forth in the planning and zoning provisions of Chapter 1 of the Los Angeles Municipal Code (LAMC) and any other relevant ordinance and do not convey any rights or privileges not otherwise contained therein, except as specifically provided for herein.
- B. Wherever this Specific Plan contains provisions regarding grading, building height, landscaping, signage, biological resources, and/or density that are more restrictive, or equinekeeping and domestic livestock provisions that are less restrictive than provisions contained elsewhere in Chapter 1 of the LAMC, the Specific Plan shall prevail and supersede the other applicable provisions of that Code.
- C. It is the intent of this Specific Plan that provisions regarding grading and development

Fred Dong – Canyon Hills EIR Comments

contained in the Slope Density Ordinance (LAMC 17.05 C), the Hillside Ordinance (LAMC 12.21 A 17) and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan including, but not limited to, Footnotes 4 and 7 shall apply to areas within the Specific Plan boundaries that are not within Prominent Ridgeline Protection Areas.

Some of the proposed grading and land form alterations will not be in conformity with the Scenic Plan. Any non-conformity with this plan must lead to the finding that this development will have a significant impact on land use. The Scenic Plan has ridge and ridgeline protection that this development would violate. Some of the development in the project would be within 60 feet of a prominent ridgeline or would actually eliminate or reduce peaks and other ridgeline features. The new plan says as definitions of what a prominent ridgeline and ridgeline protection area are,

Prominent Ridgeline. A mountain ridge as shown on Map No. 2, that has significant aesthetic quality as a scenic resource, defines a region or is unique and visually prominent as determined by the Director of Planning or the Advisory Agency. Prominent Ridgelines are identified by a line connecting the series of elevation points running through the center of the long axis of the ridge, including endpoint elevations, which are provided to indicate the approximate terminus of the prominent ridgeline.

Prominent Ridgeline Protection Area. The area 60 vertical feet from any point along the long axis of the crest of a Prominent Ridgeline and designated on Map No. 2 as a shaded area. Final determination of the Prominent Ridgeline Protection Area is made by the Director of Planning or the Advisory Agency using a topographic survey provided by the applicant as part of any Project Permit Compliance Review or subdivision action.

Further, the Scenic plan incorporates the following provisions that the EIR must discuss how it does comply with all of them.

Sec. 6. PROMINENT RIDGELINE PROTECTION.

A. Protection Measures. Application of the following protection measures to a Project shall be determined by the Director of Planning or the Advisory Agency.

1. No Project may be constructed within any Prominent Ridgeline Protection Area or portion of the area except as permitted pursuant to Section 6 B.
2. No Project shall be constructed so that the highest point of the roof, structure, or parapet wall, is less than 25 vertical feet from the designated Prominent Ridgeline directly above the highest point of the building or structure.
3. Where Prominent Ridgeline Protection Areas are shown on only one side of a

Fred Dong – Canyon Hills EIR Comments

ridgeline, buildings or structures built on the portion of the Site without Prominent Ridgeline Protection Areas shall not be allowed to break the silhouette of the applicable protected ridge.

4. No grading or berming shall occur that alters the elevation of the crest of the Prominent Ridgeline on the Site.

5. Graded slopes should be Landform Graded where practical in accordance with the provisions of the Department of City Planning's Landform Grading Manual. In order to create slopes that reflect as closely as possible the surrounding natural hills, graded hillsides should have a variety of slope ratios, should not exceed a ratio of 2:1, and should transition to the natural slope in a manner that produces a natural appearance.

6. No native vegetation shall be removed within any Prominent Ridgeline Protection Area, except for driveways, building footprints and any required equine pad or stable areas, or as necessary to meet fire safety and brush clearance regulations, to develop recreational trails, or for landscaping associated with residential lots.

7. No fire pits, picnic tables, or other similar structures associated with residential lots shall be located within any Prominent Ridgeline Protection Area unless they are screened so that they are not visible from the ROW of any of the Scenic Highways.

8. Where the provisions of Subsection A (1) above necessitate preserving a portion of the Site in an undeveloped state, the Advisory Agency in approving an application pursuant to LAMC Section 17.00, *et seq.* where the map contains a Prominent Ridgeline Protection Area, shall permit the portion of the total allowable number of dwelling units (per LAMC Section 17.05) that otherwise would be permitted within the Prominent Ridgeline Protection Area to be located on other portions of the Site with less than a fifteen percent slope, unless such property does not have sufficient area below fifteen percent slope. No increase in the maximum number of dwelling units beyond what is allowed by LAMC Section 17.05 shall be permitted, and where lot averaging is used, no lot having less than 20,000 square feet shall be created. The determination of density, adequate access, fire, and safety provisions shall be made by the Advisory Agency, in consultation with the Bureau of Engineering and Fire Department as part of the subdivision action.

B. Exceptions. Notwithstanding the provisions of Subsection A above, a Project may encroach into the Prominent Ridgeline Protection Area where it can be demonstrated that:

1. Compliance with the provisions of Subsections A(1) and (2) above, would result in greater impact on existing natural terrain and landscape than would alternative building locations on the same Site, if the Director finds that:

Fred Dong – Canyon Hills EIR Comments

(a) The lot was legally existing before the effective date of the Specific Plan, as evidenced by a recorded Tract or Parcel Map or by a Certificate of Compliance; and

(b) All or most of the Prominent Ridgeline remains undisturbed; and

(c) The Project incorporates design elements that consider the natural terrain, utilizes a minimum of grading, and protects streams and oak trees (*Quercus agrifolia*, *q. lobata*) to the extent feasible; and

(d) The Project is placed or constructed to preclude silhouettes against the skyline above the Prominent Ridgeline on the Site.

2. The Prominent Ridgeline Protection Area or a portion of the Area is not visible from the ROW of any of the Scenic Highways, and the Project is placed or constructed to preclude silhouettes against the skyline above the Prominent Ridgeline on the Site.

3. Compliance with Subsections A(4) and (5) above would: (a) substantially restrict access to a substantial portion of a Site; (b) create a land-locked Site; or (c) result in a greater impact on the existing natural terrain and landscape than would alternative access ways, then a street or private street and related improvements may be allowed to cross a Prominent Ridgeline Protection Area in accordance with the applicable regulations in the LAMC, if the following findings are made by the Advisory Agency:

(i) That the proposed street or private street is located in a manner that protects the most valuable scenic resources on the Site. The "most valuable scenic resources" shall include, but not be limited to, significant natural drainage areas located within the applicable Prominent Ridgeline Protection Area, or the highest and/or most visible ridgelines that comprise the applicable Prominent Ridgeline Protection Area on the Site, as seen from the ROW of any of the Scenic Highways.

(ii) That the proposed street or private street is located in a manner that reduces grading, and/or uses balanced grading methods.

The project as proposed does not seem to comply with these provisions of the Scenic Plan.

The project is also modifying the land form of at least 3% of the remaining open space in the Verdugo Mountains. This is a significant impact on land use. The cumulative effects of this project and all project impacting the Verdugo Mountains within the past 10 years are significant if Canyon Hills is added to it. Any type of land form alteration is an impact.

Any variance or change in the laws, ordinances, and guidelines regarding land use requested by the applicant represents a significant impact on land use. If the proposed project follows all land

use laws, ordinances, and guidelines, then it may not have a significant impact on land use. However, the proposals by the applicant are not in conformity with all applicable laws, ordinances, and guidelines, otherwise the applicant would be limited to 87 units. The requests for these variances also is a departure from the intended land use established for this area many years before the applicant purchased this property.

The EIR must change its findings to reflect that the proposed zoning and other land use changes constitute a significant and unavoidable impact of the development that cannot be mitigated. The EIR must also discuss how it does or does not conform with the goals and objectives of the local Community Plan. The EIR must be modified to conform with the local scenic plan which is in the final stages of drafting.

Section IV. H POPULATION AND HOUSING

The EIR only uses estimate projections of population from the community plan. However, these projections of population growth estimates should be tempered with actual growth rates. Using data from the Los Angeles General Plan and the U.S. Census for 2000, the Sunland - Tujunga - Lakeview Terrace - Shadow Hills - East La Tuna Canyon Community Plan Area grew from 52,920 residents in 1990 to 58,228 residents in 2000. This is a growth rate of 11.0%. The City of Los Angeles grew from 3,485,399 residents in 1990 to 3,852,993 residents in 2000. The City growth rate was 10.5%.

The Sunland-Tujunga plan area for the most recent 10 year measurement period had a growth rate only .5% faster than the city growth rate. Therefore, it is unreasonable to believe that for the projected period from 2000 to 2010, that the growth rate of this area would be substantially higher than the citywide rate. The projected citywide rate for 2000 to 2010 is 11.8% which is higher than the actual rate for the previous 10 years of 10.5%. But based on the actual growth rates, it should not be anticipated that the Sunland-Tujunga projected area growth rate from 2000 to 2010 would not exceed 12.5% instead of the 15.4% used.

In the most recent 2000 Census of the area, the average household was 2.86 persons per household and 2.93 persons occupied each owner occupied unit. The households include all rental and non-rental units. The size of the units could range from just 1 bedroom to multiple bedrooms. The owner occupied units would include condominiums and single-family residences. These dwellings could range in size from 1 bedroom to multiple bedrooms. There is no analysis of the ratio of residents per bedroom. It would seem reasonable that not many 1 bedroom units had 3 or more persons and not that many 5 bedroom units would have only 1 resident. It would seem reasonable that the average ratio of residents per bedroom unit would approach 1 resident per bedroom. The ratio could be greater than 1, but to be conservative, we will use the ratio of 1 resident per bedroom per residential unit.

The developer has not stated how large the houses may be exactly. The EIR must give a size range of the expected house size and number of bedrooms that would be expected in the project to measure the true impact of the development.

Fred Dong – Canyon Hills EIR Comments

I expect that the developer proposes that these homes have 3, 4 or 5 bedrooms typically. Some could exceed this number. The average home in project should have 4 bedrooms. Therefore, the average Canyon Hills household should be 4 persons using a ratio of 1 resident per bedroom. Even that figure of 4 persons per household may be low.

The number of expected residents per household in the EIR is only 2.97. This is low because this projected average uses dwellings that have only 1 or 2 bedrooms per residential unit. As the number of bedrooms in this development is expected to be much larger than 1 or 2 bedrooms, it is unreasonable to use 2.97 residents per unit. Using this ratio would significantly understate the number of residents per household in the development.

As we have stated above, we expect the number of residents to be 4 instead of 2.97. This is about a 33% increase in project residents than the EIR states. This is a significant impact. Instead of the 831 residents expected in the EIR, the number of residents of this project may instead be 1,120. This greater number of residents will effect the impacts described in other sections. The EIR must be change to reflect those impacts.

The growth rates in this area have been less than would be expected historically. From 1970 to 1980, the area actually declined in population from 46,529 to 45,819, a loss of about 1.5% while the city grew about 5.5%. Even from 1990 to 2000 the projected population increase was from 52,919 to 59,843 with a projected increase of 13.1%. The actual increase was from 52,919 to 58,228 with an actual increase of only 10.0%.

The development will have a significant impact on the population increases of the area. Even if you use the projected growth rates from 2000 to 2010 where the population is expected to grow from 59,843 to 69,032, an increase of 9,189 residents and use the EIR projection of new residents from the development of 831 residents, this would mean that the Canyon Hills project would account for 9.0% of the entire area increase in population for those ten years. If you use our estimates of population increase at a 12.5% rate, the area would grow from 58,228 residents in 2000 to 65,506 residents by 2010. An increase in population of 1,120 residents from the Canyon Hills development account for a 15.4% increase in the area population for the ten years ending in 2010. The increase in population from this development would constitute a significant impact on the community as this development would account for a substantial amount of the area growth.

Section IV. I TRANSPORTATION/TRAFFIC

The traffic consultant made some errors in Appendix J of the EIR. In the Traffic Consultant's Appendix A-3, on the first count taken 10/17/2002 for La Tuna Canyon, the consultant scratches out NB and puts WB for Westbound. The direction is actually Eastbound, not Westbound. The traffic consultant makes a similar error on the same page, scratching out SB and putting EB for Eastbound. This direction is actually Westbound, not Eastbound. On the next page, In the Traffic Consultant's Appendix A-3, on the second count taken 10/24/2002 for La Tuna Canyon, the consultant scratches out NB and puts WB for Westbound. The direction is actually

Fred Dong – Canyon Hills EIR Comments

Eastbound, not Westbound. The traffic consultant makes a similar error on the same page, scratching out SB and putting EB for Eastbound.

On Page IV.I-7, the second automated traffic count is listed as occurring on Friday, October 25, 2002. The actual date of the count was Thursday, October 24. These are a few errors on dates and directions that we found in the EIR. I do not know what other errors are contained in the EIR by this consultant. Some may be very serious. These corrections must be made and the Traffic Consultant's work must be review for further errors, especially significant errors that may influence the findings of significance that this project has on traffic.

The applicant should not be allowed to build the project with private streets. It seems like this is a way for the applicant to build substandard roads or streets within the project. A road or street that is too narrow could cause traffic problems especially in an emergency like a fire where residents will have to leave quickly while emergency personnel are trying to enter the area. The residents will be relying on the city for public services such as police, fire, and waste removal. A gated community will impede access to these services that residents will depend on.

Also, if the residents of the development decide to remove the gates, the street maintenance will then revert back to the city. There was a gated emergency access in the Crystal View development which was subsequently petitioned to be opened successfully by the residents. If these streets or roads in the project are below the standards that are required for public streets, the city will be burdened with this problem.

The EIR does not address the impacts if the emergency access gate in Development Area A is removed. There seems to be no legal constraint that would prohibit residents of Development Area A to eliminate the emergency access gate and use this as a normal ingress or egress route out of that part of the development. As this event is not a remote possibility if the removal of the emergency gate is not prohibited, the impacts must be discussed as a likely possibility. Removal of the emergency gate in the Development A area would probably have significant impact on the residents where this traffic would traverse.

Also, the EIR must discuss the potential traffic impact on the area if the emergency access gate will be used by residents escaping Development Area A in a natural disaster like a wildfire. This emergency access gate is built for the specific purpose of exiting the development in an emergency. As it is built for this purpose, it is likely that it will be used. The EIR must discuss the impact of this gate use on the residents in the adjoining neighborhoods and also in an emergency scenario how many residents could actually use this gate to escape. The EIR must consider the width of the roads on the escape route(s) to Foothill Boulevard and the number of other neighborhood residents who will also be escaping the area. This is important to determine if the emergency access gate in Development A will allow enough residents out in a timely fashion without creating a traffic bottleneck that will trap residents in the Development. We do not want to read in the paper about residents trying to escape a fire that were trapped in their vehicles while trying to escape through the emergency access gate.

Fred Dong – Canyon Hills EIR Comments

The new road that is built into the Development Area A that connects with La Tuna Canyon Road must be at least 60 feet wide. It will serve 210 households and is a collector street. It needs to be at least 4 lanes wide, 2 lanes in each direction, plus turn pockets where it intersects La Tuna Canyon Road. The Duke Project, even though it only proposed a development with 41 households, had the project access road 60 feet wide. It said in the Duke EIR, “The new access road would be approximately 60 feet in width (right of way), and would commence on the north side of La Tuna Canyon Road approximately 660 feet easterly of the Foothill Freeway on and off-ramps. The entry road would then proceed westerly approximately 1,320 feet at an average grade of approximately 4 ½ percent until it would intersect the proposed internal loop street (proposed as a 60-foot right of way).”

The access road must be at least 60 feet wide into Development Area A for safety reasons. A road this size is necessary both to facilitate the flow of traffic in the area and to help during an emergency evacuation of the development. If the emergency access route is cut-off, there will be hundreds of vehicles trying to exit this one point. A wide access road is necessary to accommodate exiting traffic. This must be recommended as a mitigation measure if the project is built.

Also, the grade of this access road must not exceed 10 percent. LAMC §17.05.D. says, “

D. Streets.

1. **Right of Way and Roadway Widths.** All streets and alleys shall be designed to conform with standards adopted by the Commission.
2. **Street Grades. Grades of all streets shall be as flat as consistent with adequate surface drainage requirements and the approved development of the proposed subdivision.** The minimum grade permitted shall be four-tenths of one per cent, except in extremely flat areas where a grade of two-tenths of one per cent may be used. The maximum grade permitted for major and secondary highways shall be six per cent, except where a grade not to exceed ten percent will eliminate excessive curvature, fill or excavation. **The maximum grade permitted for collector streets shall be ten per cent** and for local streets shall be 15 per cent. Variations from these requirements may be granted by the Advisory Agency upon recommendation by the City Engineer in individual cases in accordance with the provisions of Section 17.11.

Changes in grade greater than four-tenths of one per cent shall be connected by vertical curves. The length of vertical curves shall conform to standards for sight distance and riding qualities established by the City Engineer.

It is necessary that the collector road in and out of Development Area A have a grade in excess of 10 percent for safety reasons for the ingress and egress out of the development.

In Appendix J, a letter dated July 17, 2003 from Sergio Valdez, Transportation Engineer, Los Angeles Department of Transportation to Emily Gabel-Luddy, Associate Zoning Administrator, Department of City Planning, shows that a significant adverse impact on traffic will occur if the project is built. Please refer to Attachment A of this letter in Appendix J. It shows that in year 2009, that the traffic at Tujunga Canyon Blvd & Foothill will go from an E LOS without the

Fred Dong – Canyon Hills EIR Comments

project to a F LOS with the project. This is going from the level E with represents near capacity and capacity operation-where all drivers wait through more than one red signal and frequently wait through several to level F that represents jammed conditions and traffic is backed up from a downstream location on one of the streets that restricts or prevents movement of traffic through the intersection. In the same attachment, it shows that in year 2009, that the traffic at Tujunga Canyon Blvd /Honolulu Ave & La Tuna Canyon Road will go from an A LOS without the project to a B LOS with the project.

Each of these represents a significant impact by the development on the traffic in the area. These impacts are not mitigated or have been proposed for mitigation. For the project to worsen the Level of Service at two traffic intersections is significant especially, when it puts one intersection into a traffic jam condition. Therefore, the EIR must make a finding that the development will have a significant impact on traffic.

The traffic study was done utilizing manual counts of traffic on Thursday October 10, 2002 and Thursday September 20, 2001 at nine intersections. Also the report indicates that 24 hour machine counts were conducted on La Tuna Canyon Road on Thursday, October 17, 2002 and Friday October 25, 2002. The report indicates on Page IV.I-5 that traffic counts should be conducted mid-week (Tuesday, Wednesday, or Thursday) which usually represent typical travel patterns. We question why the consultant did a count on Friday if this is a day that may not be representative of typical traffic patterns. This reference to Friday is probably an error that is discussed above.

The traffic counts are based on a very small population of readings. All the readings occurred in the fall months. There may be some variance in traffic patterns between spring, winter and fall months. Readings must be taken in other months of the year to eliminate seasonal traffic variances. All traffic counts were also taken only on Thursdays for both manual counts and machine counts. Traffic patterns do vary during each weekday. Taking traffic counts only on Thursdays may create a bias in the counts collected. This could lead to errors if you were to believe that this data collected is truly representative of the actual average counts for the area. We believe that the traffic count may not be accurate.

The number of readings taken is also not statistically significant because of amount of sample population is so small. The total population of readings that could be taken during a year would be 365 days except in a leap year. If you eliminate Saturdays and Sundays and observed Federal and State holidays assuming the holidays fell on a weekday instead of a weekend, you would eliminate 114 days from the possible population of observation days. If you also exclude non-school holiday period weekdays from the middle of June through the first week of September, Christmas-New Years Holiday period, Spring break holiday period, and an additional 5 weekdays that Los Angeles City Schools may not be in session due to administrative conference or workdays, another 77 days would be eliminated from the possible population of observation days. This would leave a possible population of 174 observation days.

The observation of traffic at nine intersections was done only 1 day each of two years. The

observation of traffic on La Tuna Canyon Road was done only 2 days in one year.

The sample size calculating software was provided by Creative Research Systems.

I did some same size calculations to determine the statistical significance of such small population samples. The traffic count at the nine intersections was done only 1 day from a possible 174 observation days. The results calculated at a 95% confidence level indicates that the confidence interval is 98 with 1 measurement taken out of a population of 174. That means that the EIR consultant can be 95% confident that the traffic count represents the actual area traffic count only 3 % to 100% of the time. Since the confidence interval is so large, there is a great chance that with only 1 observation in 1 year that the results do not reflect the actual area traffic for a typical work day.

If the EIR consultant chose 4 days out of the 174 days in a year, at a 95% confidence level, the confidence interval would be about 49. That would mean that if the EIR consultant measured the traffic at the nine intersections only 4 days each year, he would be 95% confident that the traffic count represents the actual area traffic count 51% to 100% of the time. Though this confidence interval still is large, it would at least mean that the traffic counts would likely to represent the true actual area traffic for those nine intersections about half the time or more.

If we calculate the statistical significance of making two different day traffic counts on La Tuna Canyon road, we get the following results. The results calculated at a 95% confidence level indicates that the confidence interval is 69 with 2 measurements taken out of a population of 174. That would mean that if the EIR consultant measured the traffic on La Tuna Canyon Road only 2 days each year, he would be 95% confident that the traffic count represents the actual area traffic count 31% to 100% of the time. With the confidence interval so large, there is a great chance that these results are not representative of the true traffic count. Since the confidence interval is so large, there is a great chance that with only 2 observations in 1 year that the results do not reflect the actual area traffic for a typical work day.

The traffic data gathered does support our position that data on too few days were gathered. The traffic information gathered at intersections 7 and 8 on October 10, 2002 should be the same or similar to the automated traffic counts taken on October 17 and 25, 2002. These measurements were taken from the same point on different days. At both intersections 7 & 8, for AM peak hour, the volume per hour was 436 eastbound and 732 westbound for a total of 1,168 vehicles passing that point during AM peak hour. At both intersections 7 & 8, for PM peak hour, the volume per hour was 683 eastbound and 439 westbound for a total of 1,122 vehicles passing that point during PM peak hour.

However, the average vehicle travel at the same points taken by the automated systems at peak hours yields different results. The average for the AM peak hour was 1,192 vehicles per hour. This difference is only 24 vehicles more per hour or about a 2% difference. The average for the PM peak hour was 1,473 vehicles per hour. This difference is 351 vehicles more per hour or a 31.3% difference. If there is errors of these magnitude where the actual traffic count is more

Fred Dong – Canyon Hills EIR Comments

than 30% more than the count, the traffic numbers discussed are meaningless.

It seems apparent with the low number of observation days that more observation days must be done to validate that the traffic numbers used in the EIR are accurate. The numbers that are used in the EIR may have substantially understated the impact on local traffic.

I did an analysis of two of the manual counts of October 10, 2002 and September 20, 2001 and the automated counts taken on October 17, 2002 and October 24, 2002. This is the data for Intersections 7 & 8, Development Area B Access East and West and La Tuna Canyon Blvd. The counts measured existing traffic on those dates on La Tuna Canyon Road Eastbound and Westbound at that location.

I have compiled the data from these counts showing the cars going east and west on those dates at the hours the measurements were taken. We summarized the counts from all four dates and calculated an average count for each hour for each direction of travel.

I found that on any individual date, for any individual hour measurement, for any direction, the variation from the average for the hour and direction varied from -31% to 46%. This is a 77% variance range from the average. This analysis bears out what we presented above indicating that the data collected had too few collection days and is most likely not representative of the true average traffic count at any location. The traffic consultant is telling us that the traffic count at these nine intersections is representative of the true average amount of traffic that normally goes through these points on any school workday. But the actual average counts could be 31% lower than the data presented or 46% higher than what is presented. The actual average count could be even much higher or lower than the data presented in the EIR.

Thus, the existing Levels of Service (LOS) and Volume to Capacity Ratios (V/C) are probably incorrect. This means that the EIR consultant’s finding that this project will not have a significant adverse impact on area traffic most likely is incorrect too. Please refer to our analysis below:

**CANYON HILLS ENVIRONMENTAL IMPACT REPORT
TRAFFIC MEASUREMENT VARIANCE**

La Tuna Canyon Traffic Manual Count 10/10/2002						
Hours	Eastbound Total	% Variance from Average	Westbound Total	% Variance from Average	East West Total	% Variance from Average
7-8	376	-5.65%	642	-12.38%	1,018	-10.01%
8-9	392	3.70%	613	-8.58%	1,005	-4.15%
9-10	198	-0.75%	281	-13.20%	479	-8.46%
3-4	436	-9.78%	394	-19.10%	830	-14.46%

Fred Dong – Canyon Hills EIR Comments

4-5	587	-1.51%	370	-28.47%	957	-14.04%
5-6	754	-1.05%	435	-24.41%	1,189	-11.10%

La Tuna Canyon Traffic Machine Count 10/17/2002

Hours	Eastbound Total	% Variance from Average	Westbound Total	% Variance from Average	East West Total	% Variance from Average
7-8	419	5.14%	733	0.03%	1,152	1.83%
8-9	367	-2.91%	712	6.19%	1,079	2.91%
9-10	202	1.25%	379	17.07%	581	11.04%
3-4	517	6.98%	537	10.27%	1,054	8.63%
4-5	576	-3.36%	587	13.48%	1,163	4.47%
5-6	753	-1.18%	671	16.59%	1,424	6.47%

La Tuna Canyon Traffic Machine Count 10/24/2002

Hours	Eastbound Total	% Variance from Average	Westbound Total	% Variance from Average	East West Total	% Variance from Average
7-8	399	0.13%	833	13.68%	1,232	8.91%
8-9	399	5.56%	743	10.81%	1,142	8.92%
9-10	195	-2.26%	361	11.51%	556	6.26%
3-4	507	4.91%	653	34.09%	1,160	19.56%
4-5	654	9.73%	754	45.77%	1,408	26.48%
5-6	745	-2.23%	778	35.19%	1,523	13.87%

La Tuna Canyon Traffic Manual Count 9/20/2001

Hours	Eastbound Total	% Variance from Average	Westbound Total	% Variance from Average	East West Total	% Variance from Average
7-8	400	0.38%	723	-1.33%	1,123	-0.73%
8-9	354	-6.35%	614	-8.43%	968	-7.68%
9-10	203	1.75%	274	-15.37%	477	-8.84%
3-4	473	-2.12%	364	-25.26%	837	-13.73%

Fred Dong – Canyon Hills EIR Comments

4-5	567	-4.87%	358	-30.79%	925	-16.91%
5-6	796	4.46%	418	-27.37%	1,214	-9.23%

La Tuna Canyon Traffic Totals & Average of All 2001 & 2002 Counts

Hours	Eastbound Total	Eastbound Average Count	Westbound Total	Westbound Average Count	East West Total	East-West Total Average Count
7-8	1,594	399	2,931	733	4,525	1,131
8-9	1,512	378	2,682	671	4,194	1,049
9-10	798	200	1,295	324	2,093	523
3-4	1,933	483	1,948	487	3,881	970
4-5	2,384	596	2,069	517	4,453	1,113
5-6	3,048	762	2,302	576	5,350	1,338

I have included an explanation of the terminology used and other factors involving sample size from the Creative Research Systems website in the Noise Section of our EIR response.

The increased potential for traffic congestion or delays at key intersections near the project site have been understated for AM times. Many if not most of the households in this development will have 2 primary wage earners that will go to work each day. Those that do not have a minimum of two wage earners in a household may actually have more than 2. Additionally, some households that have only one working spouse might generate a number of two-way am trips during peak hour period to transport children to school. In the Oakmont V traffic report prepared by the same consultant, they used a ratio of .869 one-way trips per household at peak a.m. times in the EIR. However for this development, they used a ratio of .564 one-way exiting trips per household at peak a.m. times in the EIR. Why did this traffic consultant use a number that was about 35% lower than it did in a similar traffic study only about 2 years ago?

This ratio may be closer to 1.500 one-way trips out of the development per household at peak AM times. This would mean that 280 homes will generate 420 one way exiting trips. The consultant must take into account that there is no public transportation in this area and the ratio that they use may include residents use of public transportation. Also, households in this area do drive more than the average Los Angeles household. Sunland-Tujunga households according to the community plan drive alone 17% more than households citywide. The community plan reports that 76.2% of the area residents drive to work alone compared to 65.2% citywide.

The increased potential for traffic congestion or delays at key intersections near the project site may be understated for PM peak hour traffic too. The EIR has a ratio of .646 one way trips entering the development at the peak PM times. The Oakmont V EIR had a ratio of 1.18 one-

Fred Dong – Canyon Hills EIR Comments

way trips per household entering that development at peak PM times. Why did this traffic consultant use a number that was about 45% lower than it did in a similar traffic study only about 2 years ago?

I agree that the number of PM trips should be higher because people are doing errands, visiting, attending evening or afternoon functions. I believe that the ratio of one-way trips per household entering that development at peak PM times should be closer to 2.00. This means that 280 homes will generate 560 one-way entry trips.

The applicant must pay for any traffic mitigation required for street improvement. Such as traffic lights, any widening of La Tuna Canyon Road, reconfiguration of the freeway offramps at La Tuna Canyon, or building turn lanes on La Tuna Canyon for entry into the development.

I do not agree that 280 homes will generate only 2,680 daily trips. This results in only 9.57 daily trips per household. The same consultant about two years ago in the Oakmont V EIR, another proposed hillside development in the Verdugo Mountains used 11.15 daily trips per household. Why is the consultant using a figure that is 14% less than it used in a previous recent EIR? The consultant must take into account that there is no public transportation in this area and the ratio that they use may include residents use of public transportation. Also, households in this area do drive more than the average Los Angeles household. Sunland-Tujunga households according to the community plan drive alone 17% more than households citywide. Even the use of 11.15 daily trips per household may be low. This assumes that 2 drivers per household only make about 5 ½ roundtrips out of their house on a typical weekday. At 11.15 daily trips per household, it would result in 3,122 total trips from the development excluding use of the equestrian park. If the actual number is closer to 14 roundtrips per household as there are no services, businesses or schools that are in the development or in close enough proximity that residents would use alternate means of transportation such as walking or bicycling, the number of trips generated from this development would be 3,920 total trips.

I also believe that as a mitigation measure that a traffic light must be installed on one of the entrances into the Development Area B. In the morning, if a vehicle traveling east bound on La Tuna Canyon Road wanted to make a turn into Development Area B, during peak hour 732 vehicles during that hour would prevent an east bound vehicle from entering the development. This would mean that 12.2 westbound vehicles per minute would cross the path of an east bound vehicle trying to enter Area B. That would be about 1 car heading westbound every 5 seconds. With a 2% compounded traffic growth each year, by 2009 west bound peak hour traffic in the morning would be 841 vehicles. This would mean that 14.0 westbound vehicles per minute would cross the path of an east bound vehicle trying to enter Area B. That would be about 1 car heading westbound every 4 seconds. Clearly, unless mitigation measures are taken, access to Development Area B would be dangerous. La Tuna Canyon road is winding mountain road and only two lanes in some places.

Also, the traffic growth rate for future traffic of 2%, though it is the recommended rate of growth by the City of Los Angeles is an inaccurate measure. If the traffic figures for this project and the