

Maya Zaitzevsky, Project Coordinator  
December 29, 2003  
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(1973) 10 Cal.3d 110, 120.) The California Legislature intended that General Plans provide stability rather than flexibility for parcel-by-parcel readjustment. Additionally, the Los Angeles City Charter states that amendments for particular geographic areas should only be made "provided that the part or area involved has significant social, economic or physical identity." (Los Angeles City Charter section 555 (a).) The applicant's parcel has no such unique identity. Amendments to the City's General Plan should only be made as part of a larger planning process, not in response to individual requests.

The Community Plan presently designates 884 acres of the 887 acres Project site as A1 Agricultural or A1K Equestrian, each of which would allow the development of property on lots large enough for horsekeeping. (DEIR, p. IV.G-26.) Neither RE-9 or RE-11 as is proposed for 237 acres of the Project development (DEIR, p. IV.G-26) allows lots that are legally large enough for the keeping of horses under Los Angeles Municipal Code section 12.07.01-A-3-b.

The amendment and zone change would contribute to the erosion of the equestrian nature of the community that is highly prized by residents of the area, and would detract from the quality of life of the entire area. Once the plan is amended and zoning is changed in one location, such as the applicant's property, similar proposals are likely to follow for nearby properties. Therefore, a precedent for development that endangers horsekeeping would be set in contravention of the Community Plan.

#### **VII. The DEIR Must be Recirculated Because Significant New Information Must Be Added.**

The DEIR must be recirculated after information is added to make it legally adequate. It will not be possible to rely upon the response to comments because the DEIR is so deficient as to render public comment "in effect meaningless." (*Laurel Heights I, supra*, 6 Cal.4th at 1130.) The purpose of an EIR is to provide the public with detailed information about a project before it is approved. (Pub. Resources Code sections 21002.1; 21003.1.) "[W]hen significant new information is added to the EIR after public notice is given of the availability of the DEIR, but before certification, the EIR must be recirculated for public review. . . ." (CEQA Guidelines section 15088.5; Pub. Resources Code section 21092.1.) After the information to address the deficiencies identified here and by other public comments is added, a revised DEIR must be recirculated.

Comment Letter No. 172  
Attachment 172a

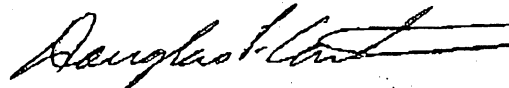
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### CONCLUSION

The DEIR is seriously inadequate. The analysis of the extent of various significant impacts must be augmented, additional mitigation for the impacts must be developed, and alternatives that avoid the impacts analyzed. These inadequacies must be corrected in order for the EIR to meet CEQA's minimal requirements. Therefore, we urge that a Revised DEIR be prepared and circulated to fully and adequately comply with CEQA's requirements. Even with mitigation, where impacts remain significant and conflict with Community Plan policies intended to minimize grading in hillside areas and preserve scenic views and ridgelines, the Project must be modified to eliminate any inconsistency.

Thank you for consideration of these comments. We sincerely hope that they will be helpful to the City in producing a document which is meaningful to the decision-makers and the public, and that will afford the protection for our environment envisioned by CEQA.

Sincerely,



Douglas P. Carstens

**JANICE VOGEL ACKLES  
7100 FLORA MORGAN TRAIL  
TUJUNGA, CALIFORNIA 91042**

December 22, 2003

Los Angeles City Planning Department  
Maya E. Zaizevsky  
200 North Spring Street  
Los Angeles, CA 90012

**Re: ENV-2002-2481-EIR: SCH#2002091018  
Canyon Hills Project-DEIR Comments**

Dear Ms. Zaitzevsky:

As a resident of Tujunga for the past 26 years, I have become quite attached to the natural beauty and cultural diversity of the surrounding communities. Because I live in the Verdugo Hills, I am situated a short distance from the proposed Canyon Hills project area and therefore take an interest in the impact this project will have on the community.

I have studied the DEIR and have noted dozens of inaccuracies and omissions in the total environmental impact. While I recognize I am not an environmental expert, I feel it is important to underscore two major existing conditions which have far-reaching ramifications for the well-being of all citizens.

**1) Fire Protection:**

There are only three fire stations in an already heavily taxed, high fire area. The total area to be covered by these facilities is vast in both wild, mountainous terrain and close-density urban sprawl and the resources are currently stretched to the limit. Should we experience fires in this vicinity like those of the past months in Simi, San Bernardino and Riverside counties, I suspect the death toll could be even higher and hundreds of acres of wilderness would perish. This area cannot support another cluster of high-density homes as proposed by the Canyon Hills developers.

**2) Police Protection:**

There are currently two police officers assigned to cover all crime-related incidents in a huge, sprawling area of the Northeast San Fernando Valley. While they are diligent in their assignment, they are unable to respond to most calls in under ½ hour. This certainly can mean the difference between life and death in many instances. Any more additional strain on the current system will inevitably result in greatly-increased crime rates. We want our community to be as safe as is possible.

While I can certainly understand anyone wanting to better themselves through commerce, land development being one such area, I also believe it is possible to make money and still have regard for the people in a community and for the environment.

Perhaps Edward Abbey, noted writer and naturalist, expressed it best, "Though men now possess the power to dominate and exploit every corner of the natural world, nothing in that fact implies that they have the right or the need to do so."

I urge the City to require the Canyon Hills DEIR to be re-issued after all the environmental impacts have been adequately addressed, and to hold the Project to comply with all laws and to the Scenic Plan.

Sincerely,

Janice Vogel Ackles

PAUL ARMBRUSTER

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12/28/03

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

**RE: ENV-2002-2481-EIR**  
**SCH#2002091018**  
**Canyon Hills Project**

To Whom it may Concern:

I have great concerns about the Canyon Hills Project that is being proposed. At recent meetings, the attorneys for the project ensured the community that the environmental impact on our community has been studied and would be considered throughout the process of the project. It was presented to us, for example, that the coyote population has been studied and that the project would not interfere with their tracking and movement throughout our community based on the data they have collected. It was also presented that the sensitive ecology of our community would not be compromised based on recent data they collected as well. I do not think that Canyon Hills has taken into consideration what actually happens to our community when the natural ecology of our community is interrupted. For example: Recently, a property owner in the area that Canyon Hills is proposing to build, "clear cut" five acres of land expecting to build a small housing development. He did this under the guise of fire/brush clearance. The beautiful trails, oak trees, and other native foliage were completely destroyed. The daily hikes that we enjoyed with our dogs and son were not only compromised, they were eliminated. In response, the coyote population who had dens and territorial establishments in the area were absolutely displaced. We lost more cats and dogs in our area than we have in many years. This was a direct response to eliminating an established ecology on merely five acres. We, as neighbors, had to keep close watch on our children - as they were threatened as well. Imagine what could happen if 300 acres were involved. Certainly the city would not like to risk the extraordinary amount of lawsuits that will likely follow if the safety of our children and pets was consistently compromised. Ironically, when this developer realized that he could not build his proposed homes - due to restrictions regarding the support of hillside septic tanks - he immediately sold the property and was released from liability for all the natural flora and fauna that he decimated.

After thoroughly reading the proposed DEIR, I'm confident that these concerns have already been addressed in letters opposing the Whitebird/Canyon Hills Project already, - that fact that the beauty and existing aesthetics of the neighborhood we all purposely purchased homes to live in will be severely compromised by a development the size that Whitebird is proposing. Therefore, I will express another one of my greatest concerns about the pending development. Canyon hills has proposed -that Hillhaven avenue will be utilized as an emergency access road providing response to the community that they intend to build. Although Hillhaven *is* an avenue, there is less than 16 feet of paved road in front of my home at 9618 Hillhaven. When neighbors drive through, we respectfully move to one side to let other "regular sized" vehicles pass by - as our access is compromised by the size of our neighborhood streets. When the occasional emergency vehicle attempts to access emergency response through our limited space, they have difficulty responding to the population that already exists. If Hillhaven is designated to accommodate emergency access to a proposed 300 more homes - possibly over 1000 new residents - the response time to these new neighbors will be greatly compromised. I can only imagine the amount of lawsuits that will be generated against the city if this new "proposed" neighborhood is allowed to be built. There is no possible

way that emergency access can be provided adequately due to the nature of our existing roads - that we as residents already have a hard time driving through with "regular sized" vehicles. Canyon Hills is proposing an emergency response nightmare that *will* happen if the project is approved. Our roads can barely support the existing traffic in an adequate manner. To add 300 more residences above us - potentially 1000 more individuals, is a disaster in the making. I urge you to consider all of the impacts that a development like Canyon Hills will create. If you are prepared for more lawsuits, loss of life, loss of aesthetic beauty, loss of natural ecology, and the loss of a community that supports the city and all the services you provide, then I suppose the revenue of a new development is clearly more important than the quality of life that we all purchased our properties in this area for. I saddens me to think that my family may someday have to move because the power of "big business" outweighs the desires of a community of taxpayers that already exists. I certainly hope that you take into consideration the feelings of those of us who have established community and appropriate growth when you make you decision to approve or disapprove a development of this magnitude. I sincerely believe that the Canyon Hills project only cares about profit - profit that they will take out of state - and feels no commitment or concern about the lifestyle and community that we value as a small neighborhood - a neighborhood that supports local business and government.

Again, I urge you to look at all the impacts that this project will create - a lack of safety, security, a deluge of traffic, and an absolute disregard for a community that those of us in the Verdugo Mountains have assiduously worked hard to create and maintain.

Sincerely,

Paul C. Armbruster

**PAUL R. AYERS, ESQ.**  
Post Office Box 29011  
Glendale, California 91209-9011  
(818) 500-4800, FAX (818) 500-4822

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

Re: CANYON HILLS PROJECT, EIR Case no: ENV-2002-2481-EIR and Reference  
Nos: SCH # 2002091018

Dear Ms. Zaitzevsky:

I believe that the EIR regarding the above referenced project is deficient because it seriously understates the impact of this development on the community. Accordingly, I urge you, in your response to the EIR, to (1) have the consultant revise the EIR to correct the deficiencies, and (2) have the City of Los Angeles re-release the EIR for additional comments once said deficiencies are corrected.

I believe the following concerns are not adequately addressed by the EIR:

\*The Development threatens the rural nature of the surrounding communities without adequate mitigation.

\*The number of daily vehicle trips generated by the development.

\*The disruption caused by 5 years of construction necessary for full development

\*Scarring from grading visible from the 210 and La Tuna Canyon.

\*Light pollution from new street lights.

\*Elimination of areas, and access to areas, used by equestrians, hikers, and mountain bikers.

\*Grading of ridgelines by as much as 80 feet and permanent alteration of 310 acres.

\*Increase air pollution and dust during and after construction.

\*Significant loss of mature trees.

\*Loss of rare habitat and significant impact to other area plants and animals.

\*Addition of 420 children to our local area schools.

\*Danger of loss of life and property during a wildfire, as the northern portion of the development would effectively have only one way to escape a fire.

\*numerous trash truck trips to haul out the estimated 5,000,000 lbs of trash generated during construction.

Sincerely

Paul R. Ayers

December 27, 2003

Los Angeles City Planning Dept.  
Maya E. Zaitzevsky  
200 North Spring Street  
Los Angeles CA 90012

Dear Ms. Zaitzevsky:

I have lived in the Sunland-Tujunga community for over 50 years and am concerned with over-development. I've seen traffic congestion increase tremendously and wildlife decrease over the last few years. I want to comment on the Canyon Hills Project DEIR. Under current zoning laws, a maximum of 87 homes is permitted on the Canyon Hills property. I urge the City to require the Canyon Hills project to stay within all current laws and codes, and within the guidelines of the Scenic Preservation Specific Plans and the Community Plan.

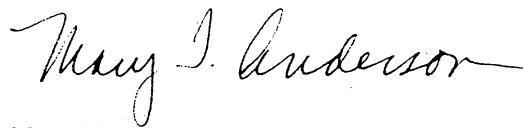
Specifically, I'd like to comment on the 210 Foothill Freeway Scenic Highway status. Currently, the 210 Freeway has been qualified as a State Scenic Highway, which provides for the enhancement and protection of the natural scenic beauty and requires scenic conservation. The construction of 87 homes on the Canyon Hills property would not constitute a major intrusion on this scenic highway. However, building 280 homes on 194 acres is considered a major intrusion.

Additionally, the proposed construction of noise barriers along the freeway would also be considered a major intrusion on the scenic beauty, effectively blocking view of the landscape. In all probability, sound walls would not be effective in lessening the noise impact on the proposed homes because the sound of traffic would be carried up the canyons.

I urge that the City Council require Whitebird Development Group to reissue the DEIR and address these concerns.

Thank you for your consideration.

Sincerely,



Mary T. Anderson  
9953 Amanita Avenue  
Tujunga CA 91042

ENV-2002-2481-EIR  
SCH# 2002091018 CANYON HILLS PROJECT