

Teresa & Kevin Draper  
9528 Hillhaven Place  
Tujunga, CA 91042

December 26, 2003

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

Re: **ENV-2002-2481-EIR**  
**Sch # 2002091018**  
**Canyon Hills Project**

Dear Ms. Zaitzevsky:

As homeowners in the area where the project noted above is to be built my husband and I believe the DEIR is inadequate because it seriously understates the impact this development would have on the communities of Sunland-Tujunga. We strongly urge the City of Los Angeles to require that developers redo the EIR and once the deficiencies are corrected to have it re-released for comment.

There are three areas of specific concern that we would feel we are qualified to comment on as we have been residents of the area adjacent to Development Area A for twelve years.

**Transportation/Traffic**

We believe that the project trip generation number need to be reassessed because they fail to take into account additional sources of traffic that a project of this size will generate for example; delivery vehicles, domestic employees, postal vehicles, pool maintenance vehicles. Considering the size of this project this could have a substantial impact on the traffic in the area.

The DEIR fails to address the increase in traffic on Tujunga Canyon Blvd. This road is a major north south roadway, which currently provides only one through travel lane in each direction on the majority of the road. Tujunga Canyon Blvd would be the principal access road for project residences to connect to Foothill Blvd and the commercial/business area of Sunland-Tujunga.

Currently Tujunga Canyon Blvd is congested during the peak hours both morning and evening. And yet the DEIR fails to even consider the impact this project would have on Tujunga Canyon Blvd beyond mentioning the recent improvement made at the intersection of Tujunga Canyon Blvd, La Tuna Canyon Road and Honolulu Avenue.

Tujunga Canyon Blvd would also be the primary route that emergency vehicles would use to access the project area. With only one through travel lane and the congested traffic conditions that currently exist on Tujunga Canyon Blvd an emergency situation such as wildfire could prove even more disastrous if emergency vehicles were delayed in reaching the site.

### **Site Access**

Although the DEIR states there is currently no plan to connect the two sites the possibility that this could occur in the future should be addressed in the DEIR.

### **Emergency Access**

The secondary emergency access points according to the DEIR are yet to be determined.

Both of the proposed access points Inspiration Way and Verdugo Crestline Dr. are unimproved, substandard roads that cannot practically be mitigated. There are reasons that these roads have never been improved and yet the DEIR suggests that improvement can and will be made but doesn't provide any specifics on how this will be done.

The DEIR also specifies improvements to be made on Alene Drive and Hillhaven Avenue both of which are too narrow to allow for the proposed 20-foot minimum. Hillhaven Avenue is also a very steep roadway, which would make it extremely difficult for emergency vehicles to maneuver.

This secondary emergency access is proposed as limited with locked gates but there is precedence for such gates to be removed by residents as happened in the nearby Crystal View development at Elmhurst Street. We ask that additional study be done to truly assess the potential impact of this access road.

### **Review of La Tuna Canyon Road**

The DEIR does not address that it is essential that there be two lanes in both directions and left turn channelization along La Tuna Canyon Road. This was recommended in the LADOT letter of July 17, 2003, Condition D-3.

**Public Services/Fire Protection**

This section of the DEIR devotes ample space to discussing fire flows, fire hazards and other government boilerplate but fails to adequately address the issues of manpower for these new fire hydrants and how they are going to be accessed during an emergency situation such as a wildfire.

The project is located outside the Fire Code's specified response distance. This condition is to be mitigated by installing fire sprinklers in all residences. How does a sprinkler system located inside a home help in the event of a brush fire?

The DEIR addresses only the distance involved not the time required for emergency vehicles, both fire and paramedics, to reach the project area. It also does not address whether the current facilities are adequate to handle additional emergencies situations that will arise with the increase in population in the proposed development.

The DEIR recognizes only thirteen related projects that would increase the need for fire protection; therefore the cumulative impact would be less than significant. But there are other projects in the the area served by the fire stations impacted by this project such as, Rancho Verdugo Estates, a housing development built by Comstock Homes located 1.8 miles from Fire Station No. 24. The DEIR needs a revised survey that includes all related projects in the areas served by these three (3) fire stations.

We need further study of how well our existing needs are being met before approving a development of this size.

The City of Los Angeles Fire Department letter of September 19, 2002 contained the following comments, which were not adequately addressed in the DEIR:

- 1) Fire Protection would be considered inadequate.
- 2) Project Implementation will increase the need for fire protection and emergency medical services in this area.
- 3) At present there are no immediate plans to increase Fire Department staffing or resources in those areas, which will serve the proposed project.

Sunland-Tujunga and La Tuna Canyon corridor are presently being protected by a total 20 firefighters in three locations. Considering the preceding information it is not too much to ask that there be a better assessment of the impact of this development on the neighboring communities.

Once again we urge the City of Los Angeles to have the developer redo the EIR to address the deficiencies in the current DEIR.

Sincerely,

---

Teresa M. Draper

---

Kevin Draper

Comment Letter No. 172  
Attachment 172r

**WILLIAM E. EICK**  
ATTORNEY AT LAW

2604 FOOTHILL BOULEVARD, SUITE C  
LA CRESCENTA, CALIFORNIA 91214

TELEPHONE: (818) 248-0050

FACSIMILE: (818) 248-2473

December 30, 2003

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

**VIA FACSIMILE**  
**213-978-1343**

Re: Canyon Hills Project  
ENV-2002-2481-EIR  
SCH No. 2002091018  
October 2003

Dear Ms. Zaitzevsky:

As the land use chairman of the Shadow Hills Property Owners Association, I have the following comments to the above referenced DEIR:

1. The California Department of Transportation has extensive drainage easements throughout the project area. These easements were created as part of the construction of the 210 Freeway and were paid for by the State of California as part of the condemnation process. The DEIR does not adequately address the existence of those drainage easements. The following questions need to be addressed:
  - 1.1 A map of the drainage easement should be attached to the EIR, which map should include the acreage affected by that easement.
  - 1.2 What is the exact language which created the drainage easement?
  - 1.3 How does the existence of the drainage easement affect each project alternative?
  - 1.4 What development can take place on the land subject to the drainage easement without the approval of the California Department of Transportation?

*Maya Zaitzevsky, Project Coordinator*

*Re: ENV-2002-2481-EIR*

*12/30/03*

*Page 2*

- 1.5 Does the existing drainage easement protect the structural integrity of the 210 Freeway?
- 1.6 What development can take place on the drainage easements without affecting the structural integrity of the 210 Freeway?
- 1.7 If the drainage easement cannot be used to build houses or infrastructure then how many houses can be built under current zoning, and the slope density and Hillside ordinances on the project site if the land subject to the drainage easement is excluded from the project?
2. The project fails to adequately address the traffic issues in the following particulars:
  - 2.1 What is the traffic impact on La Tuna Canyon Boulevard since the major shopping complex in the area (Empire Center in Burbank), the major movie theatre in the area (AMC in Burbank) and the major private school in the area (Village Christian) are most closely accessed through La Tuna Canyon?
  - 2.2 If because of additional traffic as described in Section 2.1 the City required the developer to widen La Tuna Canyon Boulevard to two lanes in both directions (rather than sometimes one lane and sometimes two lanes), what would be the environmental effect of such a widening?
3. The DEIR fails to adequately address issues related to two points of ingress and egress. The DEIR needs to answer the following questions:
  - 3.1 What are the environmental effects if two non-emergency points of ingress and egress to the project are required by the city?
  - 3.2 What are the environmental effects on ingress and egress if the city does not permit roads within the project to transgress the prominent ridgeline and two points of ingress and egress are required for each side of a prominent ridgeline?
4. The DEIR fails to analyze reasonable alternates.
  - 4.1 What would the environmental effects be if the developers' analysis of the currently permitted number of structures (less than 90) were "clustered" into 20,000 square foot lots rather than spread out over the entire project area?

Maya Zaitzevsky, Project Coordinator


Re: ENV-2002-2481-EIR

12/30/03

Page 3

- 4.2 What would the environmental impact be of an alternative project which only allowed the number of houses permitted if the drainage easement area were not included as buildable?

Very truly yours,



William E. Eick,

Land Use Chairman of the  
Shadow Hills Property Owners Association

WEE/at

cc. Council Member Wendy Greuel

Maryellen Eltgroth  
6733 Shady Grove Street  
Tujunga, California 91042  
818-352-9424

23 December 2003

Los Angeles City Planning Department  
Maya E. Zaitzevsky  
200 North Spring Street  
Los Angeles, California 90012

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

Everyone in our community is talking about the incredible increase in volume and changing patterns of traffic that has occurred here over the past two years. A quick study of the referenced DEIR reveals what could be contributing to the problem. The intersection of Foothill and Tujunga Canyon Boulevards is listed as a heavily trafficked intersection near the Canyon Hills project and the just completed Tujunga Shopping Center (a related project). All vehicular movement studies and results were completed before the end of March 2003. In April 2003 two left-turn lanes were constructed at the northbound portion of Tujunga Canyon at Foothill. That same day another left-turn lane was constructed on northbound Tujunga Canyon just 200 feet south of the intersection - diverting traffic onto Shady Grove, a narrow one block long residential street. Thousands of vehicles now turn left here, the majority seeking to avoid the traffic signal. For many years Shady Grove had been protected by a no-left-turn designation for just this reason. Presently none of these left-turning vehicles are on any traffic study. The newly created access artery of Shady Grove is nowhere mentioned in the DEIR, which was published in October 2003. It is also missing from the Tujunga Shopping Center (related project) traffic study issued February 2003, even though the construction of the two northbound Tujunga Canyon left-turn lanes are documented. This glaring omission casts doubt on the thoroughness and validity of the entire traffic distribution reports. Such oversight should trigger a reissue of a corrected DEIR.

The DEIR also exposes a problem with the sewer planning. There is reference to 25 percent of the existing La Tuna Canyon wastewater disposal system capacity being open and available to the proposed project. This notation appears as a footnote referring to a telephone conversation. The importance of this issue should require that this assertion be substantiated by a written document and included in the DEIR. Aside from this, the DEIR claims that the 280 homes proposed by Canyon



23 December 2003

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

Hills would use only 15 percent of this remaining 25 percent capacity of the 15-inch La Tuna wastewater main. It is interesting that currently La Tuna Canyon itself contains less than 500 homes, half of which are likely still using private waste disposal systems, such as cesspools or septic tanks. This raises the question of the accuracy of this data. In view of the enormous expense that public wastewater disposal systems demand, a new DEIR should be issued which presents a more thorough representation of existing homeowner sewer use and facility conditions within the La Tuna Canyon.

In order to meet the land use designations required to meet Los Angeles water use impact requirements, Canyon Hills is calculating the project's housing density using 280 dwelling units on 851 net acres (887 acres minus 36 acres of road improvements). Canyon Hills is employing this method in order to achieve the desired result of 0.33 dwelling units per net acre. This established the acreage as one integral project. The community has repeatedly asked Canyon Hills for assurance that preservation of 692 acres of open space will indeed be guaranteed. A reissued DEIR should contain specific written legal instructions on just how the 692 acres would be guaranteed preservation as open space.

Noise barriers bring up another problem with the referenced DEIR. Canyon Hills has planned for thousands of feet of non-continuous sound barriers from 8 feet to 16 feet in height. Even with this mitigation, dozens of the proposed homes would be within the 67dB noise contour of the freeway. At this noise level telephone usage is difficult. It can be described as standing in the kitchen with the garbage disposal running. A more serious problem exists in that all projected noise calculations are based on recorded noise data processed through a Caltrans noise prediction computer model LEQV2 using Sound32/Sound 2000. No corrective adjustments were made to allow for the transformation of acoustically absorptive natural terrain and flora into sound reflective surfaces such as roads, sidewalks, homes and hardscape. Even more importantly, there is a Caltrans Technical Advisory acknowledging that this computer model is only accurate to within 200 feet. Canyon Hills is using the computer model to project sound levels for distances up to 2000 feet. In addition, the LEQV2 computer model cannot account for atmospheric conditions or topography, particularly undulating terrain. The project site is a series of deep V-shaped canyons! In other words, at this time the LEQV2 computer model cannot accurately predict the noise levels to which the inhabitants of the proposed project would be exposed. Completion of the project, as designed, could result in two gated communities demanding more and more legally mandated sound walls due to excessive decibel levels. That would cost state taxpayers millions of dollars. A new DEIR is required which thoroughly incorporates and analyzes all noise parameters.

23 December 2003

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

Under California Senate Bill 1467 both the La Tuna Canyon Boulevard and the Foothill Freeway portions involved in the above referenced project qualify for California Scenic Highway status. The State has established guidelines of MINOR, MODERATE and MAJOR intrusions which effect the continued qualification of these scenic highways. "Widely dispersed buildings", such as the 87 homes permitted by current zoning on the 887-acre project site, constitute a MINOR intrusion. "Dense and continuous development", such as the 280 homes on 194 acres proposed by Canyon Hills, constitutes a MAJOR intrusion. The designation "Grading blends with adjacent landforms" is a MINOR intrusion. "Extensive cut and fill. Canyons filled in", such as proposed by Canyon Hills constitutes another MAJOR intrusion. If these MODERATE and MAJOR infractions cannot be remedied, the State's scenic highway qualification will be revoked. Retention of these local highways as State qualified scenic highways warrants special attention. A new DEIR is required which specifically examines what steps will be taken to prevent irreversible damage to our local State scenic highway status.

If a primary objective of the EIR is to protect public health and safety, the process should be revisited and a new, corrected DEIR generated. This opportunity to comment on the DEIR is very much appreciated by our community. Thank you for your attention.

Respectfully submitted,



Maryellen Eltgroth

cc: Mayor James K. Hahn

LOS ANGELES CITY PLANNING DEPT.  
MAYA E. ZAITZEVSKY  
200 NORTH SPRING STR.  
LOS ANGELES, CA 90012

**RE: ENV-2002-2481-EIR ;  
SCH #2002091018  
CANYON HILLS PROJECT- DEIR COMMENTS**

FROM: SHARON AND EDWARD EMERY  
8225 OSWEGO, SUNLAND

DEAR MAYA:

We have lived in Sunland for almost 40 years. We raised our children here and our son owns his home a few miles away. As inhabitants of Sunland-Tujunga for so many years, we feel qualified to present 'citizen expert' comments which are based on our experiences here as a family and as homeowners.

We are deeply concerned over the impact the Canyon Hills Whitebird Project will have on our community. We feel that the DEIR issued was misleading and undeveloped as a guide in which the community and the project can participate in such a weighty decision. The bigger picture of the Project's impact cumulatively is vague and/or non-existent.

The DEIR should reflect accurate statements, comprehensive field studies, well-integrated findings and believable analysis. None of these elements are present in the current DEIR, regrettably.

There are areas of the DEIR that present information as fact, when as citizens who have lived here for so many years, can easily detect the misrepresentation of these facts. We love our community and this lends us to be especially aware of the changes and/or environmental happenings of this area.

Addressing the ENVIRONMENTAL IMPACT ANALYSIS  
BIOLOGICAL RESOURCES

Since we own a large area of land we are delightfully visited by many species of animals and insects. We get racoon, possum, hawks nesting in our oak tree, squirrels and butterflies. We feel especially sensitive to the flora / fauna section of the DEIR. In all the years we have lived here we have seen cougar, coyote, foxes, and mature white owls. The DEIR presents inconclusive evidence of preservation or concern for wildlife habitat. And what is presented appears obfuscated, and woefully understudied. And perhaps even misleading in conclusions since our observation of 40 years doesn't match up with the DEIR's results. Though we are not official environmentalists, we are residents who share their land with the natural inhabitants.

Next page please.

**RE: ENV-2002-2481-EIR ;  
SCH #2002091018  
CANYON HILLS PROJECT- DEIR COMMENTS**

FROM: SHARON AND EDWARD EMERY  
8225 OSWEGO, SUNLAND

Addressing the ENVIRONMENTAL IMPACT ANALYSIS  
BIOLOGICAL RESOURCES

Continued...

The DEIR is confusing in its approach to the wildlife corridor we know to exist right across the project sight. The DEIR states it has a solution, but other authorities are stating that the solution is not workable. The DEIR is inadequate in its results if its studies were not made over years of observation. The wildlife hereabouts is notoriously reticent on appearing to people. The DEIR does not address the treatment of this wildlife corridor with enough expert analysis or consultation. We feel it is deliberately misleading as to what THEY think will suffice for corridor preservation, or habitat preservation. The DEIR is remiss in its content on the cumulative effects of blocking the corridor to the surrounding preserves, mountains or cooperative human habitat.

Addressing the ENVIRONMENTAL IMPACT ANALYSIS  
TRAFFIC

In the years we have lived in Sunland and in Tujunga, we have seen such an increase of traffic on foothill blvd, we have noticed that all the side streets are backed up as well. In just the last five years, the traffic has become so congested; it can take twenty minutes to travel four blocks.

We understand that when the new shopping center went in at Foothill and Tujunga Canyon road, this would probably be the shopping center most frequented by new residents of Whitehill project. As it is now, driving around this new project is exceedingly tricky, with sheer number of cars coming up Tujunga onto Foothill and all the other smaller residential streets opening onto Foothill. I have seen near misses with delivery trucks, school buses, passenger cars and pedestrians.

We feel the DEIR has mitigated the impact of the extra passenger /resident traffic, gardner traffic, service persons traffic, and there is inconclusive information on the widening of roads, the paving of roads, the tearing up trees to widen roads, the restrictions already on roads such as La Tuna Canyon road. The impact on restricted equestrian areas or the added danger to animals/small children with excessive traffic is not mentioned in the DEIR. The DEIR is remiss in addressing these aspects.

RE: ENV-2002-2481-EIR;  
SCH #2002091018  
CANYON HILLS PROJECT- DEIR COMMENTS

FROM: SHARON AND EDWARD EMERY  
8225 OSWEGO, SUNLAND

Addressing the ENVIRONMENTAL IMPACT ANALYSIS

#### ARTIFICIAL LIGHT AND GLARE

We live here because we love it here. It's quiet. It's dark enough to see the stars and its peace is something we cherish. We can't imagine the unsightliness of the GLOW, which would wipe out our southern sky, over the McGroarty ridgeline.

There are numerous astronomy enthusiasts in this area. Each of our neighbors has a telescope! The purity of our night skies is very important to us.

The DEIR does not give any information on the impact the extra hundreds of streetlamps and houselights would do to this area and what is important about this area, namely its low impact on the environment. That the Whitebird Project would be a very high impact on light pollution is given very little credence or serious attention. That this light pollution is avoided as a subject and portrayed inadequately, we can only assume the research was insufficient.

The DEIR does not address the cumulative effects of years of environmental impact. The Canyon Hills DEIR report should be re-issued, as it appears insufficient, misleading, defective in its conclusions, shortsighted, and insensitive to a community.

Sincerely, we encourage the City Planning Office to require the Canyon Hills development to adhere and comply with all current laws, restrictions, codes; to abide the guidelines of the Scenic Preservation Plan and the Community Plan.

Please listen to our voices at your City Planning Department.

Thank you.

*Sharon L. Emery*  
*Edward P. Emery*

Ms. Maya Zaitzevsky, Project Coordinator  
City of Los Angeles Department of Planning  
200 North Spring Street, Room 763  
Los Angeles, California 90012  
Re: Canyon Hills Draft EIR

Dear Ms. Zaitzevsky,

I am a third generation resident-homeowner of Tujunga and am writing this letter to voice my opposition to the Proposed Canyon Hills Development as outlined in the Canyon Hills Draft EIR, which is inadequate and should be redone because it is flawed and seriously understates the impact of this proposed development on one of last remaining rural areas in Los Angeles thus negatively impacting the lives of all Angelinos and everyone in the immediate area.

I would like to bring to your attention the inaccurate and biased Overview of Selected Alternatives, specifically Alternative D: Reduced Density 87 Lots, which by complying with the General Plan, Slope Density Ordinance and the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan would be much more beneficial to our community and Los Angeles in general.

According to the EIR twelve out of the seventeen categories considered under Alternative D are equal to or more effective in reducing the negative impacts compared to those resulting from the proposed development, while the remaining five are questionable at best and could also be more effective if properly mitigated and or considered from the community's point of view as opposed to that of a developer. For example;

**BIOLOGICAL RESOURCES,**

**FLORA & FAUNA** - the largest difference between Alternative D and the proposed plan is in the fuel modification zone, which is a fifty percent impact area and would be beneficial in reducing the threat of brush fires.

**NATIVE TREES** - the questionable area here is the term "surveyed and estimated", according to this section of the EIR there are only 3 Western Sycamores and 28 Coast Live Oaks on 146 acres. It is obvious that the "estimate" is not correct.