

- Objective #1 claims that the project will “help alleviate the substantial housing shortage in the City”, while Objective #2 claims that the project “will assist in satisfying the housing needs for the region”. But in terms of the General Plan, the City’s housing shortage is primarily that of “affordable” housing – and for an average homebuyer– not that of an elite homebuyer who can afford to purchase a 4,000 square foot home, as the ones proposed for Canyon Hills. The Canyon Hills homes are for an economic elite who can both afford, and have the luxury to choose, to live in any number of areas. The economic elite also tend to seek “gated” developments as well, which further alienate them from the surrounding community – a direct contradiction to the culture and character of the area, and therefore an undermining of the Community Plan.
 - Objective #5 claims the project will “provide ample equestrian and other recreational amenities” – but this is ***an outright lie***. The truth is that this project serves to directly undermine the entire equestrian culture, history and unique character of one of ***the last remaining equestrian areas in the entire City of Los Angeles***. ***IF THIS PROJECT IS APPROVED*** – with its requests for zoning variances which will directly ***eliminate the capacity for horse-keeping*** on the reduced lots, and ***IF*** the joke of a so-called “equestrian park” in Area B is allowed, with its whopping ***two parking spaces*** for horse trailers – the City will have participated in the obliteration of the community’s unique, never to be replaced culture.
 - Objectives #8 & 9 claim that the project will be in “proximity to existing services” (#8) and provide safety (#9) – yet the facts are that there will be wholly inadequate safety services regarding fire, paramedics and police response. One of our local fireman was appalled at the lack of adequate analysis in the DEIR for Fire Department response. And since the entire area is in a high-risk fire zone, it is woefully ***irresponsible*** of the developer to give this subject such thin analysis.
- 2) **The essential yet fragile links in protections between L.A. City’s General Plan, the Sunland-Tujunga Community Plan and the Scenic Preservation Specific Plan will be undermined and fractured by the Canyon Hills Project as it is currently described.** This must not be allowed to happen. It is the City’s solemn duty and responsibility to protect and defend these fragile links between Plan levels and ensure their integrity.

On the City’s website, in Chapter 1 “The General Plan System” it is stated:

“The General Plan Framework Element is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. It is the product of numerous public workshops and events, advisory committee meetings, and economic, land use, and environmental

studies conducted by a team of city planners, engineers, and consultants.

*It provides a comprehensive strategy for accommodating long-term growth should it occur as predicted. Framework Element strategies build upon the historic physical form and character in a manner that enhances, **rather than degrades, the City's and region's environmental resources and quality of life for residents.**"*
(emphasis added)

Therefore, based upon the City's own Plan philosophy and strategies, it is imperative that no "entitlements" in the form of exceptions, variances or other changes to the General Plan, the Community Plan, the Specific Plan, or other laws, codes or guidelines are granted to any developer which may result in the degradation of the City's and region's environmental resources and quality of life for residents.

Since these Plan levels and strategies were developed with vast public input over a long period of time, it is also imperative that changes to them are also considered only within a well-informed and fully transparent public arena – not on a case-by-case basis nor based on partial or inaccurate information, as is provided in the Canyon Hills DEIR.

Are you familiar with the parable of the "boiled frog"? If you put a frog into a pan of boiling water, it will jump out to save its life. But if you put a frog into a pan of cold water, and slowly raise the temperature, it will adjust to the change and slowly boil to death.

This is **exactly** how the degradation of our communities and environments occur – bit by bit, parcel by parcel, development by development, exception by exception. They are the little nipping bites of the small-mouthed piranha which cumulatively leave nothing but a skeleton. Then one day a City or community looks around and finally sees that all they once loved has been eaten away because they were slowly adjusting as the heat was turned up. Just one more development. Just one more variance. Just one more change to the City's planning philosophy and environmental protections. Just one more "entitlement" granted to this developer because, after all, they're just one developer. This gradual erosion and degradation is exactly what has happened to the once-open spaces in Valencia and Santa Clarita, and the once-unbroken ridgelines in Burbank and Glendale.

This erosion is happening all around us in the Sunland-Tujunga community as well, and the entitlements requested by the Canyon Hills DEIR are a new school of piranhas ready to nip away at existing protections in order to maximize their private economic profit for their out-of-state corporation. The City of Los Angeles must not allow any protections, nor the well-developed planning strategies and objectives of the General Plan or Community Plan, to be altered or eroded for a private gain. As a consultant on organizational change management, I fully understand and support necessary change for the better – but change to the

City's General Plan or a Community Plan for a particular development is contradictory to the stated principles of the General Plan itself.

Please make no mistake – I fully respect property owners' rights to develop their property. BUT my point here is that every property owner must only be allowed to develop their property in full compliance with current laws and guidelines.

Let's examine the General Plan Framework Element further. It states that its "strategies are based on the following principles:

- Economic Opportunity
- Equity
- Environmental Quality
- Strategic Investment
- Clear and Consistent Rules -
 - Clear and consistent rules governing both public and private sector development are necessary to expand economic opportunity and protect the character of residential neighborhoods. These rules **should provide predictability to anyone who develops property**, including small businesses and individual homeowners. (emphasis added)
- Effective Implementation"

It seems that "predictability" would preclude the granting of entitlements or exceptions to any particular property owner when such changes would degrade the character of the community.

In addition, the General Plan System cites (in Chapter 1 – under "Internal General Plan Consistency") **California State Government Code Section 65300.5** – that

"a general plan must be integrated and internally consistent, both among the elements and within each element. This requirement applies to any optional Elements adopted by the City as well as the mandatory elements.

The internal consistency requirement also applies to the community plans which collectively comprise the City's Land Use Element. All principles, goals, objectives, policies and plan proposals set forth in the general plan must be internally consistent.

All adopted elements have equal status and no element may be made subordinate to another."

These statements, based on State code, **require** that neither changes to the General Plan system – nor to any community plans – are ever made in a

piecemeal fashion since such actions **undermine the internal consistency** of the Plan.

Further, under “Internal General Plan Consistency”, we find the following:

“3. The General Plan Framework Element and Its Relationship to Community Plans

*(quoted in part) The community plans are tailored to local conditions and needs. **Adoption of the Framework Element neither overrides nor mandates changes to the community plans... The final determination about what is appropriate locally will be made through the community plans...**” (emphasis added)*

These prior statements are clear in their intention that the City will not be a “heavy hand” in the local community, but that each level has its part to play in the total City environment – and that each community and its unique character contributes to the City as a whole – when all of these elements are coordinated and consistent.

Now let’s examine Chapter 3 of the General Plan – “Land Use” –

*“It is the intent of the Land Use policy to encourage a re-direction of the City’s growth in a manner such that **significant impacts** that would result from continued implementation of adopted community plans and zoning **can be reduced or avoided**. This will provide for the **protection** of the City’s important neighborhoods and districts, reduce vehicular trips and air emissions, and encourage economic opportunities, **affordable** housing, and **an improved quality of life**.” (emphasis added)*

Next, let’s link these statements to those also in Chapter 3 under “Community Plans” – that emphasize how Community Plans are intended to support the City’s land use which “**differentiates**” one community from another, and “**such differentiation can enhance the City as a collection of distinct places, which enhance both community identity and residents’ quality of life.**” (emphasis added).

Finally, let’s examine the language of Chapter 6 in the City’s General Plan – “Open Space and Conservation” – under “Goals, Objectives, and Policies”:

“Objective 6.1

Protect the City’s natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City’s natural resources to contribute to the sustainability of the region.

Policies (quoted in part) –

6.1.2 Coordinate City operations and development policies for the protection and conservation of open space resources, by:

b. Preserving habitat linkages, where feasible, to provide wildlife corridors and to protect natural animal ranges; and

c. Preserving natural viewsheds, whenever possible, in hillside and coastal areas

6.1.7 Encourage an increase of open space where opportunities exist to throughout the City to protect wild areas such as the Sepulveda Basin and Chatsworth Reservoir.

And under Objective 6.2 on "Outdoor Recreation" -

6.2.2. Protect and expand equestrian resources, where feasible, and maintain safe links in major public open space areas such as Hansen Dam, Sepulveda Basin..." etc.

Now, on the basis of all of the quotes cited above from the Los Angeles General Plan, and taken as a whole – within their proper context of internal consistency – we must next examine what the Canyon Hills DEIR states in Section III-10 under "Project Description" -

"The applicant seeks approval of the following entitlements from the City of Los Angeles:

- General Plan amendment to change the land use designation in the Sunland-Tujunga Community Plan on a portion of the project site from Minimum Residential, Very Low I Residential, Very Low II Residential and Open Space to Minimum Residential and Low Residential (see Figure III-6)*
- Zone changes to change the zoning designations for portions of the project site from A1 (Agricultural) and RE11 (Residential Estate) to RE9-H (Residential Estate) and RE11-H (Residential Estate) (see Figure III-7).*

Based on ALL of the exhaustive effort, time, and expertise that has gone into the careful, intelligent and strategic development of the City's Plan levels, with its well-crafted integrity between the General Plan and our Community Plan, including its zoning designations which were specifically intended to protect the unique character of this community - this request for such entitlements is ***outrageous!***

Exactly why should regulations, enacted to protect a unique part of Los Angeles from environmentally harmful development, be altered for any particular group or individual, and for this project in particular? The reasons for such a request are not supported in the DEIR, and are not supportable – given the principles and goals of the City's own General Plan and our Community Plan. The "Objectives"

of the project do not substitute as reasons why this project should be developed outside of the regulations which apply to the surrounding community.

It should be crystal clear that these “entitlements” must ***NOT*** be granted by the City because to do so would be in direct contradiction to State code for internal consistency across all levels of the Plan and its Elements, and alone would undermine the City’s General Plan and the Sunland-Tujunga Community Plan.

3) The analysis of cumulative impacts (as discussed in section II-C “Related Projects”) is *not linked* to the analysis of growth-inducing impacts (as discussed in section V-C “Growth Inducing Impacts of the Proposed Project”.

The analysis of cumulative impacts (as discussed in section II-C “Related Projects”) is inadequate, and is then deferred to each separate category within section IV – “Environmental Analysis”. This would *appear* to be more thorough and detailed, but ironically it *undermines* the purpose of an EIR – to analyze the impacts on the **total** environment. This method both inadequately analyzes the “parts”, and then also fails to see the “whole”. One logically leads to the other.

The chart of “Related Projects” is out of date, and does not take into account a range of developments occurring all over this area. For example, in my immediate neighborhood alone, there are several new homes being built on four separate sites, and when added to the additional new homes in adjacent blocks, I can easily conclude there is a local “boom” going on like never before – and it is obvious to me since I’ve lived here for 20 years. There has never before been such a momentum in new building in so many neighborhoods all at once.

None of this is addressed in the DEIR – nor does section V-C analyze how this project, once implemented, will exacerbate a domino effect of more and more development in the entire community. If this project is approved, such an effect is inevitable and predictable - and to think otherwise is to succumb to being a “boiled frog”.

- Per CEQA, Section 15355:
“CEQA requires that all EIRS consider the environmental impacts of a project, along with impacts from other projects in the vicinity. These impacts, referred to as cumulative impacts, are defined as the ‘effects of two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts’.”

The language of the CEQA regulations also implies that within a single project, there can be cumulative environmental impacts. The key flaw in the entire DEIR is that it fails to address the “cumulative impacts” of this project as a whole, and therefore fails to make sense of the total impacts in a meaningful way.

4) The impact of a “gated” community has not been adequately assessed in the DEIR in terms of its long-term and cumulative impacts on the cultural environment and character of the larger community

- It has not been considered in either section IV-N, “Aesthetics”, nor in section IV-O, “Cultural Resources” – that the whole character and uniqueness of the community will be permanently impacted by the introduction of a “gated” development. Tujunga’s “culture” is not just “Bolton Hall”, and its “history” is not adequately described via human stories alone. This community ***IS ITS NATURAL SETTING, ITS ANIMALS, TREES, AND ITS HUMAN INTERACTION OF FRIENDLINESS AND AN OPEN COMMUNITY AS A RESULT OF BEING SO CLOSE TO NATURE. The human-nature connection IS the culture here.***
- What is just **one** fact as evidence of this unique community culture? The ***enormous outpouring of response letters*** to the Canyon Hills DEIR! ***Our fervent passion for our human-nature connection IS our community culture – and anything which degrades this connection degrades our uniqueness as a community – and such degradation is in direct violation of the General Plan and the Community Plan.***
- Tujunga is highly unique in its connections as a community and the percentage of people who ***actually know*** their neighbors. In my experience, nowhere else do people know their neighbors as they do here. I have spoken to people from all over the State and the nation, and repeatedly people are stunned by the fact that I know and socialize with my neighbors for many blocks in all directions.
- The “character” of the community culture promotes openness, friendliness, interactivity and inclusion – the opposite of a “gated” development.
- A community member I recently met who lives about a mile from me stated that she has lived here for 30 years and never locks her door.
- Another community member I recently met who has lived here over 40 years told me with tears in her eyes that she can’t believe all of the problems in other parts of the City and how great it is to live here where we treat each other with respect.
- Even a person I recently met who lives as close as Montrose – just two communities away – remarked that her neighbors want nothing to do with each other.
- Our City Councilperson, Wendy Greuel, has also publicly remarked on how unique the Sunland-Tujunga community spirit is in comparison to other parts of the City.
- Why is this? Why is Tujunga so unique in its cultural character? I am not going to speculate further here on why that it so, beyond restating

that it is our close human-nature connection – but I am stating that ***IT IS SO***, and that a ***“gated” development is anathema to our unique and open community*** and will serve to harm our community environment over time.

- The DEIR *fails to take this into account and fails to assess the long-term impacts on the cultural environment and potential for eroding the community’s unique character*. When the Canyon Hills homes are advertised as a “gated” community, they will likely draw those residents who prefer to remain apart from the larger community, and this will become a self-fulfilling prophesy.
- One “gated” development paves the way for yet another, per the factors related to “growth-inducing” impacts – which have not been adequately addressed anywhere in the DEIR.

5) Aesthetics (section IV-N):

- This section provides completely misleading visual simulations and a distorted analysis of visual impacts. The simulations depict scenes of only a few scattered homes on the outer edges of the project site. For example, as if viewed heading NE on the 210 freeway:
 - i. Photo Simulation #3 shows only a dozen or so houses on the eastern ridge, with fully developed trees softening the views of the houses themselves. Just to the left (north) of this little section there would lie the 200+ houses in Area A – ***for which there is no visual simulation!*** How convenient to have omitted the very picture which would portray a very different environmental impact on the beholder!
 - ii. Photo Simulation #4 also depicts only a dozen or so homes with fully developed trees, as if viewed from only the western side of the western ridge – which lies on the OTHER SIDE of the ridge related to the project site. Again, the visual impact is minimized in the eye of the beholder. Yet, again, logic tells us that just over the ridge – within the project site – and looking north – BINGO – there they would be! Now you see them, now you don’t - those 200+ homes which magically do not exist in **ANY** of the visual simulations! Golly, where did they go?
- This section repeatedly minimizes and then masks the total environmental impacts to aesthetics by the following:
 - i. It “clocks” the exact number of seconds it takes to travel at 65mph along the 210 freeway, and view various areas of the project site, and then **minimizes the impact** of that time since one does not see the entire project area at any one point along the freeway. Well, of course not! There are ridgelines there – naturally! And in some instances the project will reduce those

ridgelines by 80 feet. **This is not in the visual simulations, nor is this fact integrated into the analysis. The semantic distortion and omission are misleading.**

- ii. Simulation #7 is the only visual that addresses the cluster of 200+ homes in Area A, but it is a view looking south from Verdugo Crestline Drive – **NOT** looking north from the 210 freeway. While the DEIR acknowledges the visual impact to residents to the north of the project area, yet again semantic distortion attempts to *minimize* the environmental impacts to the Scenic Corridor from the 210 freeway as follows:

“... the vast majority of the public who may view Development Area A would do so from Interstate 210. For those individuals, this area is almost invisible. (See Photo Simulations 3,4 and 5). ”

This is absurd. Laughable. **“Almost invisible”**??? First they “clock” the time it would take to view this section of Area A from the 210 as 77 seconds, then they minimize the reality and value of the time (stop and count up to 77 seconds – it is not just nothing!) – and THEN they determine that the view for those 77 seconds is “ALMOST INVISIBLE”. By whom – a sightless driver who shouldn’t be driving at all? This type of semantic distortion is manipulative and grossly inaccurate.

It would appear they reached their conclusion in order to minimize the reader’s perception of the project’s impact on those provisions within the Scenic Preservation Specific Plan which expressly protect the open vistas along the 210 freeway.

To correct this distortion, there should be visual simulations developed of Area A looking north from the 210 at several points, so that the public can actually SEE what the visual impact of 200+ homes might look like from the 210 freeway.

In addition, since Whitebird is not actually building the homes but only the pads, there should be visual simulations of what 200+ cement pads will look like for years at a time, clustered or scattered within Area A, from the 210 freeway.

Finally, there should be a visual simulation of what the sound walls will look like at up to 16 feet – and blocking vistas at key points.

6) Biology (Section IV-D)

Regarding Fauna and Wildlife Movement:

- There are many oversights, omissions and distortions in this section of the DEIR. It is obvious that there is a lack of first-hand, intimate

knowledge of the specific terrain and wildlife on the part of the report writer and even some of the “experts”, which is evidenced by the omissions of environmental issues specific to the terrain.

1. There is a conclusion that no cougars are found on the project site, when just recently a neighbor and her son clearly saw a cougar near their home - which is within a quarter mile of the project site. Certainly such a large mammal needs a large area to traverse, and it is likely that it and other large mammals have been on the project site.
2. There is a **highly distorted statement** in the DEIR regarding coyotes – “it is expected that up to five coyotes would use the project site and Duke Property at any given time”. Our community has been having a very hearty laugh about this statement for weeks, since all residents here know how abundant the population of coyotes is all over this area.
 - a. There is a coyote den on the property next door to me.
 - b. Nearly every day and night I see and hear several coyotes on my street and surrounding areas.
 - c. In early December, a mother coyote and her two adolescent pups were out hunting while I was walking my dog. The mother stopped only 20 feet from me and the hair was up on her back – as if my dog and I were a threat and she was prepared to defend her pups. This was scary, but fortunately a car drove by and she ran off. I respect and love these encounters – they are an integral part of living in Tujunga. In spite of potential danger, I do not want anything to reduce the population of coyotes **because coyotes ARE Tujunga**. Residents who seek to live in a “gated” development where “outside” people are unwelcome are even less likely to welcome coyotes. This needs to be addressed in the DEIR as a potential environmental impact.
 - d. How will coyote encounters be handled by the new residents? Will they poison or trap the coyotes? If so, such actions will undermine our community culture. Again, this needs to be addressed since such encounters will occur with predictability.

3. There is ***no mention of roadrunners in the DEIR***. They are elusive – and yet I’ve observed one or two roadrunners every year for the past 10 years. They live here – and feed on the ever-present snakes who live here too. Yet the experts quoted in the DEIR failed to observe or mention roadrunners. That they are not seen does not mean they are not here. This fact goes for other species as well.

One must be here to observe in every season, day and night, over several years – ***and be patient*** - to understand and appreciate the unique, rich and beautiful diversity of animals that live in this area. They are not available “on demand” – but are seen at unusual times and in surprising ways.

The DEIR fails to reflect this richness and diversity of animal life which IS the character of Tujunga. Without the diverse animal life, “Tujunga” as a unique culture is no more.

CEQA guidelines make it clear that the State wants to prevent the elimination of wildlife species “due to man’s activities”, and that local plans and ordinances must be applied to ensure that the spirit of the law - not just the letter - is upheld.

The DEIR does not uphold the spirit of the law regarding the protection of animals on and near the site.

7) Artificial Light and Glare (Section IV-F)

The DEIR states –

“The percentage of clear nights in the vicinity of the project site is low due to the ever-present pollution, haze and ‘marine layer’ in the Los Angeles area.”

THIS IS ABSOLUTELY FALSE. I can factually state from my experience of living here for 20 years – and for 10 of those years having a panoramic view of the city lights below to the west, and which overlooks the project site itself – that at least 75% of the time the night sky is clear and clean – and the stars bright for viewing with a telescope.

8) Finally, there is a lack of transparency in this project and the “interests” behind this project.

In numerous face-to-face conversations with the developer, there has been an unwillingness to answer questions about whose interests are represented. Something just isn’t right. Again – the fact that Whitebird and Consensus Planning Group share the same downtown L.A. address smells fishy, doesn’t it?

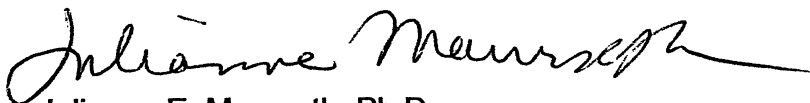
Is the City at all concerned about this, or not? Does any of this have relevance to the State code for "internal consistency" and "harmony" between all of the Plan elements and the spirit of a well-informed public process?

In conclusion, the DEIR is seriously inadequate and misleading as a total environmental analysis. Therefore it must be revised, reissued and redistributed to the public for review and comment.

Once we destroy the delicate environmental balance of this area, there is no repairing it through "mitigation measures". Let's take the steps now to be rigorous and thorough.

Thank you very much for the opportunity to address my "Comments" to you and your department. I hope the City Planning Department will carefully consider these issues. Those of us who live in this area not only enjoy and love its natural beauty, but are intimately familiar with and knowledgeable about the interdependent environmental factors that must be respected and protected for future generations.

Sincerely,



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