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CANYON HILLS PROJECT
LA TUNA CANYON, CALIFORNIA

OBJECTIONS TO SEVERAL POINTS OF ANALYSIS CONTAINED WITHIN THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CANYON HILLS PROJECT IN LA TUNA CANYON, SUN VALLEY, CALIFORNIA

File # 2002091018

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DECEMBER 31, 2003
DEPARTMENT OF CITY PLANNING
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MAYA ZAITZEVSKY AND ALL WHOM IT MAY ALSO CONCERN:

As an 18 year owner of property located immediately adjacent to the proposed Canyon Hills Project in La Tuna Canyon, Sun Valley, California, I have studied the Draft Environmental Impact Report (EIR) prepared by the project's developers and am **dismayed** by some of the report's inaccurate conclusions and faulty methods of conducting research. Based on my comments contained herein, I DEMAND that the Department of City Planning perform an intensive review of the various components contained within the EIR and refuse to accept it as an accurate study as it currently is written.

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My objections are in these 4 areas:

- 1) Hydrology
- 2) Wildlife presence
- 3) Wildlife Movement
- 4) Traffic Impact
- 5) Fire Prevention/Brush Clearance Requirements & Impact

HYDROLOGY

RUNOFF: The Hydrology report prepared by Crosby Mead Benton & Associates in May 2003 admits that the Canyon Hills Project will cause extra water runoff during storms because of the "...new impermeable surfaces (paved roads, driveways, structures, residential hardscape)" that will be present after the construction. They propose a mitigating solution to this extra runoff, which will end up in the La Tuna Canyon Wash, by

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series of debris catch basins which they claim will actually reduce runoff by 10% over what actually exists now.

OBJECTIONS: I AM VERY SENSITIVE TO THE HANDLING OF ANY WATER RUNOFF THAT MAY ENTER La Tuna Canyon Wash, as the wash runs right through my property for a distance of about 700 feet. The wash appears in my property as a delightful natural stream surrounded by gracefully sloping banks. There are no retaining walls containing this wash (as appears farther downstream) anywhere on my property.

There has been a history of flooding in La Tuna Canyon that has destroyed homes and property. In 1978, a storm runoff incident related to construction of the 210 freeway destroyed 2 homes on my property. In years where storms deliver more water than is typical, the Wash as it runs through my property overflows its banks with raging waters at least 5 feet deep, clogging the nearby bridge culverts with debris which, if not cleared during the storm, will always threaten to wash out the dirt road which adjoins it and which serves 5 current residences. *The Wash currently overflows and simply can not take even another drop of water without resulting property damage!*

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The proposed mitigating debris catch basins will have inherent hazards that have not been adequately addressed:

Maintenance: as they catch debris, the basins will FILL with debris. Will they be built big enough to catch all possible debris and not overflow during a heavy storm? Will the homeowner's association of the Project indeed be **legally bound** to provide adequate (which means annually, at the least) maintenance of the basins? ***If they are not legally bound, and the basins do not adequately catch the extra runoff caused by the Project, the extra water will find its way through my property destructively!***

During my university education in Engineering, we were taught to always add a safety factor of 10 times above our calculations when figuring human protection factors. **THEREFORE, I SUGGEST THAT THESE CATCH BASINS ALL BE CONSTRUCTED 10 TIMES LARGER THAN CURRENTLY PROPOSED!**

WATER QUALITY: The Report takes into consideration that the water quality of storm runoff entering La Tuna Canyon Wash will be subjected to pollution from the Project, particularly auto-related (oil, coolant, gasoline), pesticides, fertilizers, and pet waste.

OBJECTIONS: The La Tuna Canyon Wash is a 2-mile long, beautiful Riparian forest area that is a habitat for many types of animals and which runs right through my property for about 700 feet. My dogs drink the water. My trees and plants tap into the water. My other animals drink the water. Wild animals RELY on the water for life! The Wash is currently a beautiful, relatively clean idyllic stream of water.

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The Project's pollution additions will be NEW problems rarely encountered before. *Now the Wash will become more like a sewer rather than a thread of life for all concerned.* Canyon Hills Project has no right to pollute this waterway! If this polluted water is allowed to flow onto my property, the usage of my agriculturally-zoned property for the keeping of livestock and pets will be severely hampered while being fraught with hazard!

There has been no effective mitigating factors suggested for containing pollution from the Project (they suggest education and signs for their residents). **THERE HAS TO BE BETTER CONTROLS ADMINISTERED TO CONTAIN WATER POLLUTION IN THE LA TUNA CANYON WASH! THEY NEED TO PIPE ALL OF THEIR STORM RUNOFF OUT OF THE AREA OR BUILD A WATER TREATMENT PLANT ON THEIR PREMISES.**

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TRAFFIC

The firm of Linscott, Law, & Greenspan Engineers, (LLG) prepared a traffic impact report for La Tuna Canyon Road and drew very suspect conclusions that the project will have no significant impact on La Tuna Canyon Road, despite the fact that any reasonable person, standing on the side of the road at about the 8400 address and observing traffic flow, would readily see the dangerous situation caused by the westernmost of the two "bottlenecks" (a zone where the highway's 4 lanes converge into two, one traveling lane for each direction) on La Tuna Canyon Road, yet the conclusion of the report was "Therefore, no mitigation measures are required or recommended" (page IV.I-39).

The Westernmost bottleneck at about the 8400 block of La Tuna Canyon Road is fraught with beeping horns, screaming driver voices, loud engines, screeching tires and even grinding metal collision sounds during many hours of the day because of the heavy amount of traffic, the elevated speed limit (45 mph) but typically 60 to 70 mph speed of vehicles, the fact that the bottleneck occurs through two relatively tight road curves. Many minor accidents occur on about a weekly basis at the bottleneck, judging by the various automobile part torn from vehicles that I have to pick up and dispose of on the side of my 700 feet of highway frontage and by my trash cans that are periodically. At least once a year we have a major accident that often sends a vehicle crashing through the metal barrier down into the La Tuna Canyon Wash (One barrier still remains crushed and mangled from the last collision). In one incident, an accident resulted in an axle and wheel crashing through the side of my house, destroying my bathroom while I wasn't home. A tenant on my property helped the axle's owner retrieve it but did not get the driver's information because it was dark and the damage wasn't seen.

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I utilize the left-hand turn lane provided in the bottleneck every time I turn into my driveway entrance from the highway. And EVERY time I have to encounter a vehicle traveling westbound down the highway I have to witness a near accident condition, as vehicles invariably swerve partially into the turning lane because of their high speed or as they battle for position with other vehicles or as they attempt to negotiate the two sharp highway curves. Too many times I have seen my life flash before my eyes as I anticipate a seemingly imminent collision from a swerving oncoming vehicle as I wait in the left-hand turn lane. Once, a vehicle swerved so abruptly to avoid me in the left-hand turn lane that they "got sideways" and temporarily lost control of their vehicle.

Traffic report inadequacies:

- 1) The Linscott firm based their report conclusions on accidents occurring between 1990 and 2000, and then diluted their findings by spreading the

accident density over the entire 5 miles of La Tuna Canyon Road (most of the road is a wide, straight, well-constructed 4-lane highway).

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- 2) They also did studies at "nine intersections" in the area, strangely ignoring the important intersection at Sunland Blvd and La Tuna Canyon Road, a mere 3 1/2 miles from the Development B area.

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- 3) When analyzing the distribution of Project residential vehicle traffic expected after 2009 when the Project is to be completed, there were inadequate assumptions on traveling direction. It is my observation that the majority of residents in La Tuna Canyon tend to travel West, as the markets, shopping, and employment opportunities in the San Fernando Valley, Burbank, Glendale, and Downtown Los Angeles, are best accessed by this route which leads to Interstates 5 and 170. Yet the report indicates that most of the traffic will try to access the 210 and nearby Sunland/Tujunga.

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The traffic volume Westbound and back from the Project has been drastically underestimated! And this traffic's impact, however slight it could minimally be, will be gigantic at the bottleneck on La Tuna Canyon Road! This bottleneck needs to be eliminated! **THE ROAD NEEDS TO BE WIDENED AT THIS POINT AND STRAIGHTENED AROUND THE TWO CURVES IN ORDER TO SAFELY ACCOMMODATE THE EXTRA TRAFFIC THAT THE PROJECT WILL OBVIOUSLY CAUSE. IT ISN'T SAFE NOW! HOW CAN IT BE ANY SAFER ONCE ADDITIONAL TRAFFIC IS POURED THROUGH IT UNLESS MITIGATIONS ARE ADDED?**

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FLORA AND FAUNA
WILDLIFE MOVEMENT

The Glenn Lukos Associates performed a wildlife study in La Tuna Canyon and made many inaccurate and suspect conclusions:

- 1) On pages IV.D-45 and 46, they concluded that in reference to the two-striped garter snake which is a CDFG species-of-special-concern. "...species was not detected during surveys and is not expected to occur in the study area..." despite the fact that I have seen several of these snakes on my property, immediately adjacent to the Project property, as recently as summer 2003 over all the years I have owned it.
- 2) Similarly, they made erroneous conclusions regarding sightings of Cooper's Hawks, (a nest of which exists in an Oak tree on my property only a few feet from the Project boundary), Opossum (which abound in the wash area), mule deer (page IV.D-149) whose scat and footprints and sightings I have seen in heavy abundance in the hills and wash of the Project property, bobcats, and other animals.
- 3) They counter their own conclusions. Regarding Local Animal movements, they say that the project won't have any effect on the movements, yet they say that the animals affected, principally mule deer, coyotes and Raccoons, are adept at changing their habits, and that they can access the wash if they can't get through the project property. Please see pages IV.D-149, 151, 153, 155, 156 and 161.

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- 4) **GLOW BUG** :They saw no other endangered animals or animals of special concern, yet they missed a very strange and unusual animal that I have seen on five different occasions: there exists on my property, the Project property, and the surrounding hills, an insect which has luminescent properties! This insect is a small, ¼"long worm or caterpillar which glows in the dark so brightly that it illuminates many inches around. The glow is a fluorescent green and is akin to a Firefly. I have only seen the insect in the hot summer months, usually in July. I have seen it at close range and have been accompanied by witnesses who have also seen it. It exists! I brought this to the attention of biologists at the Canyon Hills Project Open House and they ignored me, claiming I must have seen a reflection in the moonlight. I submitted written comments at that Open House regarding the glow-bug.

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FIRE PREVENTION/BRUSH CLEARANCE REQUIREMENTS

There was no mention that I could find of how Project designers would reduce the impact on their neighbors that the Project would cause regarding annual Brush Clearance requirements set and enforced by the City Of Los Angeles Fire Department. Currently, owners are responsible for clearing brush for a distance of 200 feet around their own and neighbors' structures and combustible fences. The Canyon Hills Project borders my property for perhaps a total of 500 feet, with 200 to 300 of bordering at the actual construction site. Adjacent to the actual construction site, my property is extremely steep, relatively inaccessible hillside, yet according to the plans that I have seen, Project developers are planning on building several homes nearly right on the boundary with my property, ignoring the fact that I will be required to clear for 200 feet all around, for a distance as much as 300 feet, their development. Given the steep terrain, this task could cost me thousands of dollars annually in payment to brush contractors and subject me to additional insurance concerns for the tough hillside hazards that exist.

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A concerned developer should have expressed a reasonable sentiment toward this issue and designed their construction to be at least **200 Feet And Probably More Reasonably 300 Feet** (given future Fire Department footage extensions) so as to not burden their neighbors beyond reasonable levels. **THEY ULTIMATELY ARE EXPOSING THEIR OWN PROJECT STRUCTURES TO HAZARDOUS HILLSIDE BRUSH CONDITIONS IF I AM NOT ABLE TO COMPLY WITH FIRE DEPARTMENT REQUIREMENTS IN THIS PARTICULAR HILLSIDE AREA.**

LAND USE COMPATIBILITY

The EIR Report made an erroneous conclusion regarding compatibility of the Project with nearby and adjacent neighbors. On page IV.G-15, they state: "The proposed low-density single-family homes in Development Area B would be functionally compatible with the existing homes along La Tuna Canyon Road." Yet, they are proposing 70 homes on only 52 acres in La Tuna Canyon, much of the 52 acres being local and access roadway and storm runoff basins. My adjacent property has 2 dwelling units over about 7 acres. All of my neighbors typically have one dwelling unit for several acres of land. They also state:

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"The Proposed low-density single-family homes would be constructed adjacent to existing residential communities to the North, Northeast, and Southwest. These adjacent communities are more dense than the proposed homes." ***My property is on the southwest! How can my 2 homes in 7 acres be more dense than their project?***
THE PROJECT WILL CROWD MANY HOUSES INTO CERTAIN SPECIFIC ACRES AND WILL NOT BE FUNCTIONALLY COMPATIBLE WITH THE NEIGHBORING HOMES IN LA TUNA CANYON!

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

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

I urge the City Of Los Angeles to deny any tract development in La Tuna Canyon because an area with a delicate ecosystem is no place for this kind of project. I know that the project is to be divided into two parts. The portion nearest Sunland-Tujunga must be cut down in size to avoid the problems mentioned in this letter. The portion in the Canyon itself should not be subject to a zoning variance because this area is appropriate for only agricultural type residences. By maintaining the current Agricultural zoning laws, the city might find fuel enough to limit or prevent any of the development from taking place at all. Developers can find hillside somewhere else to build; there is no room for this in a delicate wilderness area.

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

FOR THE GOOD OF THE CANYON AND FOR THE GOOD OF RESIDENTS PLEASE DENY THE ZONING CHANGES REQUEST OF THE CANYON HILLS PROJECT!!!!!!

SINCERELY,

FRANK BUCHANAN