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ENVIRONMENTAL
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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.

101-1

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.

101-2

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.

101-3

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.

101-3

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.

101-4

Emergency Access

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

101-5

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.

101-6

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.

101-7

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.

101-8

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.

101-9

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.

101-10

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?

101-11

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.

101-12

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.

101-13

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

101-14

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.

101-15

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.

101-16

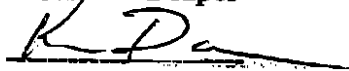
Once again we urge the City of Los Angeles to have the developer redo the EIR to address the deficiencies in the current DEIR.

101-17

Sincerely,



Teresa M. Draper



Kevin Draper