

December 26, 2003

TO:  
 Ms. Maya Zaitzevsky, Project Coordinator  
 City of Los Angeles Department of City Planning  
 200 North Spring Street, Room 763  
 Los Angeles, CA 90012

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 CITY OF LOS ANGELES

DEC 30 2003

ENVIRONMENTAL  
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RE: Comments to Canyon Hills Project D.E.I.R.  
 ENV-2002-2481-EIR  
 REF: SCH 2002091018

**BIOLOGICAL RESOURCES-WILDLIFE MOVEMENT**

1. On page IV.D-129, the author states "The rugged landscape and dense vegetation generally restrict wildlife movement by larger animals, such as Coyote and Mule Deer, to existing wildlife trails along ridgelines, roads and firebreaks (Emphasis added). This is categorically false. During the fourteen (14) years that I have lived in the area, I have personally hiked the three (3) riparian habitats located within Development Area A, on more than one (1) occasion. If the author had done this as well, it would have been obvious, as it was to me, that numerous wildlife trails come down to the riparian habitats from the ridgeline area above. They occur in such frequency as to create a "tentacled web" of travel by an assortment of wildlife species, as evidenced by animal prints and scat in those areas. It is entirely misleading for the author to speculate on the true extent of local animal movement if they have not extensively examined the areas noted. 107-1
  
2. On page IV.D-131, while summarizing the "fragmented character" and "tenuous link" for regional movement of wildlife, the author claims that "It is important to note that, even if animals move out of the San Gabriel Mountains via the Tujunga Wash, they would not necessarily move toward the Verdugo Mountains..." This would appear to be incorrect by virtue of a sighting this year of a Mountain Lion in the ravine between Inspiration Way and Reverie Road, by a resident. This also speaks of the very real possibility of a community of Mountain Lions living within the Verdugo Mountains. 107-2
  
3. On page IV.D-141, the author states "It is difficult to determine the exact number of Coyotes; however, based upon documented home range sites for Coyotes, it is expected that up to five (5) Coyotes would use the project site and Duke property at any given time." I would invite the author to visit the adjacent residential community in the evening hours, when two (2) or more **PACKS** of Coyotes yell to one another from the two (2) blue-line stream areas directly on the project site. Additionally, a total of four (4) Coyotes were personally viewed on our property during the week of November 10, 2003, and again during the week of November 24, 2003. It is difficult for me to envision that 80% of the author's estimated quantity of Coyotes just happened to be present on our property at that time. 107-3

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4. In summarizing the regional and local movement of wildlife as they would be affected by the proposed development, the author states, in effect, that there is no impact and that mitigation is unnecessary. Then, under "cumulative impacts", the author states that "only the Duke Project (related project no. 7) is sufficiently close to the project site to potentially and cumulatively interfere with movement of wildlife species" (Emphasis added). This is a contradictory and often repeated example of the author's "double speak" relative to the wildlife movement issue. The incremental loss of additional wildlife habitat in the Verdugo Mountains would continue if this proposed development would be approved. This point is conveniently underplayed and dismissed as unimportant.

107-4

**ENVIRONMENTAL IMPACT ANALYSIS - LAND USE**

1. On page IV.G-6, in describing the legislative status of the Draft San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, the author accurately states that "Since the Specific Plan has not been formally adopted yet, it currently has no legal force or effect and does not have to be considered in this Draft E.I.R. However, given the significant public interest and community involvement in the Draft Specific Plan, it's principal components are discussed below for informational purposes." It is encouraging to see that the Developer has included discussion on it's main points in the D.E.I.R., and is considered politically correct in doing so, but they have also specifically excluded all relevant dialog relative to how their proposed development might be affected by the State-Recognized Scenic Corridor status of the 210 Freeway and La Tuna Canyon Highway. The final E.I.R. should include all dialog relevant to it's restrictions.

107-5

2. On page IV.G-28 (and preceding pages as applies), under "Cumulative Impacts", the author states that "The Duke Project is to be considered to be compatible with the proposed project and the existing residential uses Northeast of the project site." It is conveniently not discussed that the original request for the Duke Project was to build a total of 41 homes by virtue of its request to change the existing zoning and strike footnotes from the Community Plan. These requests were summarily rejected by the City in their final approval of the 10 homes for the Duke Project. It is inaccurate and misleading for the author to draw comparisons with projects that have not changed existing land use designations for their implementation, as this project proposes doing.

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3. In reference to the author's statement on page IV.G-29 that "the proposed project's land use impacts would be less than significant", it truly boggles the mind that this statement is made when, in point of fact, the proposed project goes against the grain of the spirit of all existing land use designations. There is a consistency in all statutes, guidelines and ordinances that specifically intend to prevent developments, such as this, from being approved. To quote appropriate jurisdictional guidelines:

(a) Statutory Regulations of California State Policy Re: Environment, Public Resources Code no. 21001:

"Additional legislative intent to take all action necessary to provide the people of this State with clear air and water, enjoyment of aesthetic, natural and scenic and historic environmental qualities, and freedom from excessive noise,"

and

"Insure the long term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian shall be the guiding criterion in public decisions."

(b) CEQA, Section 15021 (a):

"CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible and (1) in regulating public and private activities, Agencies are required to give major consideration to preventing environmental damage." (Emphasis added)

107-7

**ENVIRONMENTAL IMPACT ANALYSIS - POPULATION AND HOUSING**

1. On page IV.H-4, the author states that approximately 693 acres (i.e. 78% per cent) will be designated as "permanent open space." By what legal means will this process take place? How can the Community be assured that this will occur? I suggest that the Developer give the land as a grant to the Santa Monica Mountains Conservancy if they truly are interested in appeasing a distrusting public.

107-8

**ENVIRONMENTAL IMPACT ANALYSIS - TRANSPORTATION/TRAFFIC**

1. On page IV.I-15/16, in describing the emergency access to Development Area A, it is mentioned that Hillhaven Avenue, Inspiration Way, and Verdugo Crestline Drive all have a "40 foot wide dedicated public street" width. This is entirely misleading considering the actual street width. There are portions of these streets where the actual

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and functional travel width narrows to less than 15 feet! In an emergency situation, when traffic from fleeing vehicles on the site would be opposed by emergency vehicles heading towards the project site, this would create a situation where traffic would be impeded in both directions. This would create an extremely dangerous situation for all citizens, and this attempt at providing for a required secondary access from Development Area A is totally inadequate. Additionally, the author states that the emergency access would be controlled, in that it would not be used by the project's residents on a day to day basis. Historically, these types of access controls have been overcome by residents looking for a "quick way into town." Reference the Crystal View Development to the East of the project site for just the closest example of how good intentions gave way to public pressure. Just who would be responsible for repairing any damaged access control elements when (not if) they are overcome by the residents? When this occurs, the entire provision of "emergency access only" is relegated to a very dangerous joke.

107-9

**ENVIRONMENTAL IMPACT ANALYSIS - PUBLIC SERVICES/FIRE**

1. On page IV.J-4, in discussing fire hazards and specifically the fire on August 5, 1999, it is stated that "The LAFD's records are not conclusive regarding the precise location of the fire." As a resident who lived through the nightmare of this fire, I and many other residents can confirm that this fire originated along La Tuna Canyon Road, and was an arson fire. The prevailing winds, at the time of this fire, pushed the flames toward the Northwest, directly towards the proposed Development Area A. This was also not the only arson-induced fire in the immediate vicinity. With the likelihood of a similar fire in the future, all means of reasonable egress from the site would be eliminated. This is an unmitigatable danger for the residents of this community.

107-10

**ENVIRONMENTAL IMPACT ANALYSIS - AESTHETICS**

1. The author has gone to considerable depth in this section to describe how the project will ultimately "fit in" to the surrounding areas. One only has to look on page IV.N-41, under "Level of Significance After Mitigation", to understand the net result of the proposed development. In the author's own words, "Project impacts with respect to scenic vistas, scenic resources, and existing visual character would remain significant following implementation of the recommended mitigation measures (Emphasis added)." **THE BLIGHT THAT THE PROPOSED DEVELOPMENT WOULD HAVE RELATIVE TO THIS ISSUE SHOULD NOT BE ALLOWED TO HAPPEN.**

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ADDITIONAL COMMENTS TO THE D.E.I.R.

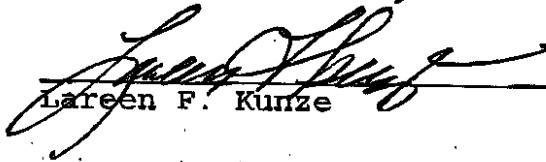
- Existing land use designations and other ordinances specifically restrict the allowable number of homes over the entire 887 acres to 87 homes. This Developer should be required to abide by the same restrictions as any other land owner also affected by them. Simply because a developer wants to increase their profits should not be a reason to entertain changes to land use designations. The proposed 280 homes exceeds the currently allowable number of homes by 193!!! What justification does the Developer give for this?? The actual reason is their interest in making more money. If the Developer wishes to donate 78% of the area's open space, the Community would welcome that with open arms. But by doing so, they should still only be able to construct as many homes as is currently allowed over the remaining 22% of land.

107-12

Respectfully submitted,



Charles E. Kunze



Lareen F. Kunze

Residents of:  
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