

Comment Letter No. 111

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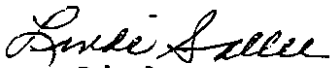
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ENVIRONMENTAL
UNIT

To

Los Angeles City Planning Department
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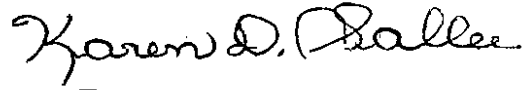
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Regarding

Draft Environmental Impact Report (and Appendices)
Canyon Hills Project
ENV-2002-2481-EIR
SCH No. 2002091018
City of Los Angeles

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INSUFFICIENT FACTS AND SUPPRESSION OF FACTS ALWAYS INVITES DANGER.

AESTHETICS

"The availability of truly natural environments with plenty of fresh air, wildlife, and clean water is of critical importance to us all. Their value is profound, obvious in many physical ways, but beyond human comprehension in most." Leon Gorman, President, L. L. Bean.

The 887 acres tucked into the Verdugo Mountains, also known as the Canyon Hills project site, currently has the above mentioned fresh air, wildlife, and clean air. If the development is permitted to be built, the profound benefit the land now has in its natural state will be lost forever. Throughout the EIR it is stated that the construction of the proposed project would result in substantial unmitigable adverse aesthetic impacts. "As indicated therein, none of the alternative designs would reduce all of the significant impact associated with the proposed project to less than significant levels (with the exception of the NO Project Alternative.)" (EIR V-1)

The project site is directly adjacent to the Foothill Freeway (210) a designated scenic freeway, and La Tuna Canyon Road, a designated scenic highway. This project would adversely affect these scenic roadways, not just in the immediate vicinity, but literally for miles. It is doubtful the term "scenic highway" was meant to describe continual views of asphalt and houses. If it were, then all of the freeways in Los Angeles must be so designated.

The proposed development will be located in a steep walled box canyon. Three sides are steep canyon walls, and the fourth is a man made steep wall on top of which is the 210 Freeway.

The construction of this project requires massive grading of ridge lines and canyons. This grading will grossly and permanently alter the topography, open space, and vegetation on these acres. The developer proposes to replant the area so it will blend in with the surrounding landscape. This is preposterous. Native vegetation will not replant well, plus it is considered combustible material. The grading plan also calls for the destruction of oak trees. Oak trees do not survive transplantation.

The EIR states that elements will be used to integrate the proposed project with natural open space. This seems to be a contradiction. How can anything be integrated into an open space? Once something is placed into an open space it is by definition no longer open. How can 280 houses with their accompanying ribbons of asphalt, concrete sidewalks, drainage systems, noise barrier walls, fences, retaining walls, and street lights ever be integrated into "open space?" The construction of this project will create permanent scars on the land that will never be "integrated." This project is not a haircut whose unsightly effects will be unnoticeable in two weeks. This project is an amputation of the land. That which has been cut will never regrow. Some greenery band-aids may be applied, but the deep and irreparable scars will be visible in perpetuity.

111-2

The aesthetic summary (EIR I-47) states that "while the proposed project has been designed to preserve the existing visual character and quality of the project site (by creating a low density clustered residential community that avoids the appearance of a "tract" development), the proposed project would transform undisturbed hillsides into a 194 acre residential community." The houses will be clustered on land that has to be cut and filled in order to make the building pads. It seems that the developer needs to look at his schematic map to see that this development looks exactly like those tract developments that are built in flat land in our local desert, Texas, Las Vegas, and Henderson, Nevada. This is to me a sign of tract development.

111-3

The EIR section IV N page 37 states, "However, while the project has been designed to minimize the visibility of the proposed homes, based on the close proximity of the Development Area to two designated scenic highways, the proposed development should be considered to have a substantial adverse effect on scenic vistas, and the proposed project's impact on scenic vistas would therefore be considered significant."

111-4

This development would affect the visual character and quality of open space for the residential community to the north and northeast. Contrary to EIR (IV N-10) views are not restricted to

Tranquil Drive, Reverie Road, Inspiration Way, Glen-O-Peace Parkway, and Verdugo Crestline. Homes to the northeast along Amoret, Estepa Drive, Tranquil Place, and Tranquil Drive as well as homes located in Crystal View will have views of all the topography (except at the base) of area A.

111-4

The area adjacent to the project site is semi-rural with narrow streets and low density housing. In essence, to those who live there it is an oasis from the crowded urban four lane streets with houses that are only a few feet from each other. If this project goes forward then the cancer known as urban sprawl will have a foothold in one of the few open areas remaining in Los Angeles. Left unchecked this foothold will become a stranglehold and all of Los Angeles will be consumed by urban sprawl. For the sanity of Los Angeles' humanity should not we leave some large contiguous areas untouched so their natural beauty can nurture our eyes and our souls?

111-5

OPEN SPACE

Throughout the EIR report the developer keeps referring to "remaining open space." Why? Regarding the remaining land, all that is said is that the rest of the acreage is open space "for now." "...are currently no roads or tracts into this area A." (EIR IV D-61) Are there future plans to develop the remaining area? This is repeated in EIR IV H-7 which states "roadways and other infrastructure are not anticipated to be extended into previously undeveloped area that would be available for future development." I thought the remaining land would be open space and turned over to the Santa Monica Conservancy.

111-6

RIDGE LINES

"The majority of the cut pads proposed in the development plan are situated along ridge lines with a portion of the proposed pad cut extending to the vertical slope face." (EIR IV A-31) The District Plan recommends that there be no grading on principle ridge lines. Your design to build on the ridge lines, to me, is wrong. Yes, ridge line houses do give a view, but the effect of the ridge line houses will be seen all over the area plus across the valley. (example--homes built adjacent to Seven Hills, Tujunga)

Why lower a secondary ridge line? (EIR IV B) Why do developments have to destroy any ridge lines? If one has to build, keep it off the ridge lines, but then, of course, the developer would not make as much money.

111-7

"If all or a portion of a Prominent Ridge Line Protection Area is not visible from any listed "Scenic Highway," then a single dwelling may encroach into such Prominent Ridge Line Protection Area or portions thereof..." (EIR IV G-24, Section 6 B) The dwellings would be seen from La Tuna Canyon Blvd. and Foothill Blvd., Tujunga/Sunland. Therefore, there should be no development on any portion of the ridge lines. Once a precedent is made others will no doubt follow. A prominent ridge line is just that, and no building or part of a building may encroach upon said ridge line.

In conclusion, there should be no ridge line development!

RIDGE LINE GRADING

This project proposes to grade 125,000,000 cubic feet of earth. This amount of earth represents approximately 463 football fields each covered to a depth of six feet. Such an excessive amount of grading creates numerous problems. "...grading in the project would transform the rugged skyline and complex terrain of the hillside into more regular patterns of horizontal planes." "...central portion of Development A, grading would reduce the height of an existing ridge line by as much as 80 feet."

111-8

"...substantial portion of Development A would involve the removal or alteration of existing scenic resources such as land forms and undisturbed natural native vegetation, which would substantially impact scenic resource." (EIR IV N-38) All of this is unmitigatable.

111-8

Cutting off 80 feet of a ridge line is unmitigatable. The topography of the area would be drastically changed for eternity. To even suggest cutting that much of a ridge line is reprehensible. Money, money, money, is the only motive for even suggesting such an atrocity.

FIFTEEN PERCENT SLOPE DENSITY ORDINANCE

What happened to the 15% Slope Density Ordinance that the developer seemingly does not have to abide by? Even with the cut and fill the land will exceed the 15% slope. According to the ordinance (No. 162,144), if the developer is permitted to build, he is only allowed 177 houses on the 887 acres (one house per five acres), not the 280 houses he wants.

111-9

DENSITY

As stated under Impacts in the EIR "...the proposed homes would be less dense than is permitted under the current General Plan use designation for the project site, and therefore would be consistent with the City's growth projections." What is the definition of dense? Putting 280 houses clustered into 194 acres to me seems high density. This land is not flat, rather, a steep canyon. These houses are not spread out over the entire acreage. That would be too expensive for the developer.

111-10

ELECTROMAGNETIC FIELD EMISSION

The EIR states that the proposed project does not have enough evidence pro or con concerning electromagnetic radiation and its adverse effects on people living in the project site. "...some estimates of electromagnetic field exposure might be related to cancer." (EIR IV M-20) The Edison power lines transverse the project site. Many houses will be built as close as permissible parallel to the power lines. To absolve any future claims by the residents of the proposed houses, the developer will give each prospective buyer a "disclosure statement" absolving them of any future illness claims. Buyer Beware!

111-11

WILDLIFE CORRIDOR

Have signed receipt letters been sent out to the following: ants, spiders, bugs, rabbits, chipmunks, moles, gophers, ground squirrels, tree squirrels, raccoons, coyotes, deer, quail, road runners, bobcats, rats, mice, lizards, gopher snakes, king snakes, garter snakes, and rattle snakes telling them that they have a wildlife corridor all to themselves via Edison power lines and Verdugo Crestline Drive? Does the developer really believe that the wildlife will just stay in the boundary of the Edison wires? Have the wildlife been informed about the electromagnetic field emissions under or near the Edison power lines? Let us be realistic, wildlife will go where they please. I know, as the wildlife meanders through our property all the time. That is what makes this area unique. I wonder if the future residents of this development will appreciate this wildlife in their area.

111-12

EQUESTRIAN

This development was originally presented as a horse keeping area. Now only three acres and two parking stalls have been allocated for horse keeping. (EIR IV E-20) Wow! Can they afford it?

111-13

OAK TREES--ENVIRONMENT

There is an Oak Tree Preservation Ordinance No. 154,478. If this project is approved, it will greatly affect the oak trees located on the project site. The Coast Live Oaks are part of the city of Los Angeles' Oak Tree Preservation Ordinance. They are of significant importance and an environmental resource. Oak trees that are removed will not survive replanting. If extirpation and replanting is the mitigation for the oak trees, then, in essence, there is no mitigation for the oak trees.

111-14

The removal of all natural features and the flora and fauna in the graded areas will result in overall adverse effects in the plant life and animal life. Loss of food for the wildlife would be caused by the development. Loss of food equals loss of animals in the area. This is significant. The grading would also do selective removal of vegetation for fire prevention. The impact would be considered adverse and unmitigatable. All of this will be gone forever.

111-15

LIGHTS

Your writer believes that the lights will only affect the area directly adjacent to your project. This is not true. In fact, the lights, especially from your "planned ridge line" houses, will be seen clear across the valley, and from Hillhaven Ave., Estepa Dr., Tranquil Place, Tranquil Drive, Reverie Rd., and Crystal View. All of the lights for the houses planned south of Verdugo Crestline Dr. (according to your schematic) would be seen from Foothill Blvd. Obviously, your staff is not familiar with this area. We will be living in a giant light bulb.

111-16

TRAFFIC

Inspiration Way or Verdugo Crestline Dr. to the north is proposed to be the ingress/egress road into the area. Inspiration Way would be the less costly to the developer, as it is the shorter of the streets to Alene Dr. which then feeds into Hillhaven Ave., the main road out of the area. Not only does Hillhaven Ave. absorb the traffic from Verdugo Crestline Dr., Inspiration Way, and Alene Dr., but it also handles all of the traffic from all of the roads south of the Alene Dr./Hillhaven Ave. intersection. In addition, Amoret intersects Hillhaven Ave. a short distance from the Alene Dr./Hillhaven Ave. intersection as Hillhaven Ave. winds its way down to Foothill Blvd. All of these streets are narrow. The width at some portions of Hillhaven Ave. is only twelve feet. At times, if one encounters a garbage truck, fire truck, large delivery truck, dump truck, ambulance, etc. backing up becomes mandatory. Hillhaven Ave. itself was not constructed to handle this much traffic. Widening the road is not an option. Where will the land be obtained? One-half of the street has homes built on pads. The other side has homes built on the side of a canyon. Must these people lose their driveways and yards so they can have traffic where their children once played?

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The ingress/egress road south of the project site will require a ridge line to be cut to make the ingress/egress road connect to

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La Tuna Canyon Blvd. This is, of course, only if Caltrans gives them the right of way on the property adjacent to the 210 Freeway. If Caltrans does not give permission for the right of way, the developer plans to access his property using Duke Development land. Here, too, a ridge line would have to be cut. If this occurs, the cars using this ingress/egress could then use the Duke Development ingress/egress to get to Foothill Blvd. They would drive down Amoret to Hillhaven Ave. instead of going up La Tuna Canyon Blvd. to Tujunga Canyon Blvd. From there the traffic on Hillhaven Ave. becomes a nightmare as this street is extremely narrow and hilly. Emergency roads will in all probability be used to go to school, churches, or grocery stores as they will be shorter than the previously stated route of having go to via La Tuna Canyon Blvd., Tujunga Canyon Blvd., etc.

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Your writer of the EIR report stated that Hillhaven Ave. ends at Alene Dr. (EIR IV I-16) This is an error. Just what do you think the home owners south of that intersection use for access to their homes?

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In addition, the developer wants a signal installed for his development. Since when does a private gated community have a signal installed for its exclusive use? (EIR I-36)

111-20

FIRE

As you well know we have had devastating fires in Southern California. The way the houses are laid out in the proposed development it will be difficult to keep any fires from spreading to all the clustered houses. Ridge line houses, especially, according to one fire report, will be difficult to save. Firefighters had to leave local fires. Due to the terrain they were unable to fight the blazes. In November, 1980, we had a fire which started on Inspiration Way. This fire burned the canyon and subsequent canyons all the way to the Castaway Restaurant in Burbank.

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The development will no doubt meet all the necessary fire safety building requirements, but will that be enough should a fire start, as they usually do, during a Santa Ana wind? How will this be mitigated?

SCHOOLS

The need for a new high school requires the students to be bused or driven by carpools to the Van Nuys area where the new high school is currently being built. Any of the other high schools in the area would also require bussing or other modes of transportation. All of the schools are some distance away thus, walking or bicycling from the proposed site is not feasible. Younger children living in the project site will also require transportation to their schools because the distance is too far and the streets are too dangerous for the children to walk or bicycle to and from the elementary and middle schools. (EIR I-36)

111-22

SEISMICITY

The Canyon Hills project site is located near several active faults. The nearest known fault is the Verdugo-Eagle Rock fault zone located three miles to the southwest of the project site. In geological terms, the Sierra Madre fault zone, six miles east and

111-23

the Ramond fault, twenty-two miles east are very close to the project site. Did your geologist find the "inactive" fault located on the Duke Development project site? I believe it is close to the entrance to that project site.

As your geologist knows, earthquakes occur on "inactive" faults or even on faults that were not previously known to exist (for example Northridge, Sunland, and Landers in San Bernardino County). "Inactive" and "dormant" do not indicate a permanent condition as those near Mt. St. Helens in 1980 will attest.

111-23

AREA B

The area bounded by La Tuna Canyon and the 210 Freeway is an area where the water drains to a catch basin. All the planned water flow from Area A and B into the La Tuna Canyon wash is stated to be less than significant even though there will be more water and the runoff will be swifter. (EIR IV L-13) The additional water from the houses and runoff from the streets will increase the volume and therefore the rate of the runoff.

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Sound walls are to be built in Area A and B, especially Area B, since according to the graphic many of the houses will be elevated above La Tuna Canyon Road and will be visible to passerbys and freeway users. Sound walls will not stop all the freeway noise. In fact, sound does not travel in a straight line, but spreads out much like a megaphone due to the topography. The noise will rise and be louder the further the distance from the project.

111-25

COMPUTER DRAWINGS

The computer generated houses are way out of proportion to the house used in the foreground. It would be assumed that the houses would be far away from the foreground "real" house. That is again incorrect. The canyon in question is narrow and with fill, the houses will be raised on their pads to be much larger than shown. The "small" houses are to give the illusion that the houses will be unobtrusive. If you were to show the houses as they are in the schematic these "small houses" are really going to be all crammed into a "mess" of tall buildings.

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CONCLUSION

Any development of "tract housing" in a small confined area would in essence abolish the District Plan and ultimately the General Plan of this area.

Land use should not be designated for the profit of a few, but for the health, safety, and aesthetic enjoyment of all--wildlife, vegetation, and humans. If land use is only for the profit of a few, then the wisdom and foresight of the City Council will have been in vain. The solution is for the city and state to purchase the site for the use of all. Are the needs of a few more important than the needs of the many, or is the need of money more important than the needs of all? The Constitution answers that question.

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