

Charlie Marko  
7930 Apperson Street  
Sunland, CA 91040

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December 28, 2003

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

Re: Canyon Hills Draft EIR , ENV-2002-2481-EIR , SCH #2002091018

Dear Ms. Zaitzevsky,

The Draft Environmental Impact Report for Canyon Hills is, in my opinion, inadequate, incomplete, and misleading. In particular, the section dealing with *Aesthetics (IV.N)* blatantly tries to downplay the enormity of the project and it's irreversible harm to our community's visual resources. Key information (found elsewhere in the DEIR) is omitted and/or contradicted in the *Aesthetics* section in an attempt to fool the reader into thinking that the project will be "invisible".

131-1

Here are some examples:

- 1) **There will not, as the DEIR claims, be 693 acres of "permanently preserved open space"**. Throughout the DEIR, the claim is made that 693 acres of the 887 acre project area will be set aside as "permanently preserved open space". The developer apparently has arrived at this figure by subtracting the 194 acres that the homes will be "clustered" on from the 887 acre total project area. But on page III-6 (*Project Description, Grading and Construction*) we are told that "the combined grading operations for the entire project site would affect a total area of approximately 240.23 acres". Then, on page *IV.N-14*, (only one page after making the "693 acres of open space" claim) it's stated that "...grading and brush clearance/fuel modification will permanently alter the appearance of 310.7 acres within the project site." This would leave us with only 576.3 acres of open space. Unless, of course, one turns to page *IV.C-3 (Hydrology)*, and learns that only 448 acres would be unaffected by the proposed development.

131-2

On page III-8 (*Project Description*), the report concedes that the “permanently preserved open space” will consist of both “modified open space” and “natural open space”. Obviously, the developer is trying to call any patch of land where there isn’t a house “permanently preserved open space”. The parking lot of our local Kmart has plenty of “modified open space”, but you won’t find anyone hiking or picnicking there on a Sunday afternoon.

131-2

- 2) **Use of contradictory and/or misleading language:** The proposed project would require a massive amount of grading. Ridgelines would be reduced in height by as much as 80 feet. Artificial slope walls would reach as high as 200 feet. Grading operations “would involve a total earthwork quantity of 4.6 million cubic yards (plus 20 percent for remedial grading).” The Aesthetics section (*page IV.N-11*) of the DEIR says: “Overall, the effect is that of a community perched on the land, rather than forced onto it.”

131-3

I can think of no bird that needs to move 4.6 million cubic yards in order to “perch”.

- 3) **The Aesthetics Section fails to even mention the construction of two 1.5 million gallon water tanks.** According to page IV.L-3 (*Utilities and Service Systems-Water*), “the proposed project would be required to provide two 1.5 million gallon water tanks.” One would be “at an elevation of approximately 1,900 feet” and the second would be “at an elevation of approximately 2,200 feet”. It goes without saying that these two massive structures would have a significant adverse effect on the visual character and quality of our community. Yet there isn’t a single word about them in the section of the DEIR dealing with aesthetics.

131-4

- 4) **“Aesthetics” does not address the construction of sound barriers along Interstate 210.** Figure IV. E-2 (*Receptors and Barriers used in Traffic Model*) maps out the placement of sound barrier walls along Interstate 210. These walls, ranging in height from 6 to 16 feet, would obviously have a significant adverse effect on the visual character of the freeway. “The Sunland-Tujunga Community Plan designates Interstate 210 as a scenic freeway” (*page IV.N-2*). Despite this, the DEIR never discusses their impact on our community’s visual resources.

131-5

- 5) **No measurements are ever given for the minimum distance between houses.** The DEIR claims that the development has been “designed to create a low-density, clustered residential community that avoids the appearance of a ‘tract’ development”... “Hence, the design avoids the look of large house squeezed onto small lots.” But in section III (*Project Description*) we are told that these homes will average 4,000 square feet in size and be situated on lots as narrow as 70 feet.

131-6

The only distance the report ever provides for the space between these large homes is "ample side-yard spacing" (page IV.N-11, *Aesthetics*). One can only assume that "ample" can be interpreted as "legal". **"Legal" side-yard spacing could result in very large homes spaced only 10 feet apart.**

131-6

6) **No measurement is given for the proximity of homes closest to Interstate 210 or La Tuna Canyon Road.** In addition to designating Interstate 210 as a scenic freeway, the Sunland-Tujunga Community plan designates La Tuna Canyon Road as scenic secondary highway. The proximity of the development's "clustered" homes will help determine it's impact on the visual character of these roadways. The DEIR fails to provide this information, and therefore fails to fully assess the project's impact on our community.

131-7

7) **The Visual Simulations are vague, incomplete, and misleading.** The DEIR's Visual Simulations (*Figures IV.N-12 through IV.N-20*) do not depict the housing development proposed in this report. The spacing between houses is far too great to accommodate 280 homes on 194 acres. The lots appear much larger than the 70 to 90 foot parcels described in Section III, *Project Description*. There is no evidence of the massive landform alterations that will occur after 4.6 million cubic yards of grading. The simulations from Interstate 210 do not show the 6 to 16 foot sound barrier walls. There is no evidence of brush clearance/fuel modification; the homes in these fanciful "simulations" seem to be completely enveloped in native vegetation. As depicted, these homes would most likely fail to comply with brush clearance standards.

131-8

The DEIR (page IV.N-17) claims that, "The photo simulations include generic streetscape and residential landscaping, aged to show what the growth could look like after approximately 10 years of growth." This statement begs the question: If they find it necessary to artificially age these photos by a decade, just how bad will this site look for the first 10 years?

131-9

Overall, these simulations are very vague. The "photos" are taken from an extreme distance, with the houses appearing as blurry objects that are smaller than the cars and bushes in the foreground. They fall far short of providing an accurate picture of what this project will look like.

131-10

8) **The "Observation Points" chosen for the DEIR seem to be carefully chosen.** Observation Points 1 through 6 of the DEIR (IV.N-15) are probably the only spots on the planet where there would be little or no view of this massive development. Any reasonable person looking at the site map will conclude that this project will be seen from a great distance and from virtually any angle.

131-11

9) **The report attempts to minimize the loss of visual resources along Interstate 210 and La Tuna Canyon Road.** By using numerous hypothetical situations that sound like grade school math word problems-- "At 65mph, it takes a vehicle approximately two minutes thirty seconds to traverse the length of the

131-12

property.”—the DEIR (pages IV.N-7 through 9) tries to downplay the enormous adverse visual impact of this project on our scenic roadways. Yes, one will only see it for two and a half minutes when traveling at 65mph, because at 65mph, you’re covering over a mile a minute. By the DEIR’s own admission, this project will have 2.7 miles of frontage along Interstate 210 and stretch approximately one mile along La Tuna Canyon Road. Yet the author(s) attempt to bury these facts under pages of frivolous “word problem” text.

131-12

The visual character of the Verdugo Mountains is more than just a backdrop. Our community’s visual resources are one of it’s most precious. These resources are non-renewable. The authors of this report must realize this, as well. That would explain why the section on “Aesthetics” is so vague and incomplete. This section of the report, as well as the rest of the DEIR, is inadequate. It must be revised so that it reflects not just the developer’s opinion, but the truth, as well.

131-13

Thank you for your time and consideration.

Sincerely,



Charlie Marko