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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,

I believe that the Canyon Hills Draft EIR grossly understates the amount of incompatibility of the proposed project with the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan (the "Community Plan").

On page III-2, the Community Plan states:

The community includes large areas of open space and natural landforms. It is one of the more rural areas of the City and supports a substantial equestrian-oriented population. It is a policy of the Plan to protect these areas from encroachment by incompatible uses.

138-1

The proposed development is an incompatible use. Converting hundreds of acres of open space into a housing development that will not have any sort of rural character goes against the spirit of the Community Plan.

The Community Plan Policy 1-3.3 reads: "Preserve existing views of hillside and mountainous areas." The proposed development is obviously incompatible with this.

138-2

Policy 1-6.2: "Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area." The "Program" entries go on to cite the Minimum and Very Low densities and the Citywide Hillside Ordinance, but the DEIR blithely states that "the proposed project takes into account the steepness of topography..." while asking for changes in land-use designation and, effectively, exemption from the Hillside Ordinance. In fact, the project is inconsistent with the plan, as evidenced by its need for such changes in public policy.

138-3

Policy 1-6.3: "Require that grading be minimized to reduce the effects on environmentally sensitive areas." The DEIR, on page IV.G-20, when addressing this policy, begins: "While the proposed project would require approximately 4.6 million cubic yards (including remedial) of grading..." then goes on to say how this is, in some sense minimal. This is nonsense! This is a huge amount of

138-4

grading. It may be minimized in some sense, assuming that the project goes forward as proposed, but this amount of grading is clearly inconsistent with the Plan.

138-4

Community Plan Goal 5-1 reads: "To preserve existing open space resources and where possible develop new open space." While it may be laudable that a large portion of the project would still consist of open space, the conversion of 194 acres of open space into housing developments is inconsistent with this goal. It's also inconsistent with Policy 5-1.4: "Preserve as much of the remaining undeveloped hillside land, as feasible, for open space and recreational uses." It would be far better if the City would follow the "Program" that follows this policy: "The City should encourage continuing efforts by the County, State and Federal agencies to acquire vacant lands for publicly-owned open space."

138-5

The project is also incompatible with Policy 5-1.5: "Protect Scenic Corridors by establishing development controls in harmony with each corridor's individual scenic character." The proposed development would make a major negative change in the aesthetics of the Scenic Corridors designated in the Community Plan (top of page III-13), particularly I-210 and La Tuna Canyon Road. Virgin hillsides which are gratifying to the eye would be replaced with relatively dense housing developments.

138-6

The Community Plan (top of page III-16) finds that the area it covers is "grossly underpoliced." The Program following Policy 8-1.1 states that "The decision-maker should include a finding as to the impact on police protection service demands of the proposed project or land use change." This finding could only be negative: adding another 280 homes will stress police resources even further.

138-7

The "Transportation Demand Management" section of the Community Plan begins (on page III-19) by stating: "It is the City's objective that the traffic level of service (LOS) on the street system in the community not exceed LOS E." The projections in the DEIR (in Table IV.I-6, page IV.I-28) show that the LOS projected for I-210 Westbound Ramps and Sunland Boulevard is LOS F. This table projects the increase in V/C at 0.006, which is not "significant," but this projection is based on the trip volumes forecast in Table III.I-3 on page IV.I-18, which are way too low for this area. The projection in that table is that the total vehicle trips during the AM peak hour from 280 homes will be 53 in and 158 out. This may be reasonable as an abstract city-wide average, but these are to be large, expensive homes, suitable for families with several cars and maids, gardeners, etc. A better estimate would be double these figures (for both AM and PM peak hours), which would make the impact at I-210 WB/Sunland and Tujunga Canyon Blvd/Foothill Blvd. significant.

138-8

The DEIR, on page IV.G-16, in discussing compatibility of the proposed project with the Community Plan proposes changing the land-use designation for 237 acres from Minimum Residential, Very Low I Residential or Very Low II Residential to Low Residential. Of course the project will be compatible with the Community Plan and existing land-use designations if these are changed to fit the project! But we should not change our land-use policies to suit the developer.

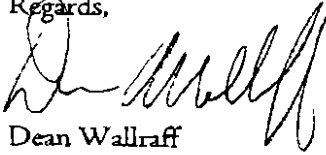
Similarly, at the top of page IV.G-26, the DEIR proposes changes to the existing zoning designations for the portion of the site where homes will be built, and goes on to show that the proposed land-use will be compatible with the new zoning rules. Of course it will be, if these changes are approved, but neither they nor the proposed land-use designations should be changed. The proposed project with the surrounding neighborhoods, and we residents of the area would much prefer that the developer propose an alternative project that's consistent with existing land-

138-9

use designations and zoning regulations. No such alternative was proposed in the DEIR, which is a significant omission that needs to be rectified.

138-9

Regards,



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