

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

certainly did not expect was to find this outright denial of the obvious incompatibility with the adopted Sunland-Tujunga-Shadow Hills-Lake View Terrace-East La Tuna Canyon Community Plan, which is an integral part of the Los Angeles General Plan. It's worrisome that the "public" is cautioned by City staff to use only facts and stay clear of argument and speculation when this DEIR clearly uses argument and speculation, while it attempts to dismiss potential negative impacts to the community out of hand, or ignore them altogether, occasionally anchoring itself within the technical language of the Los Angeles Municipal Code only where it can attempt to argue alignment to the project, (even when substantially incorrect). I will not insult either my own intelligence or yours in pretending to be able to out-lawyer the lawyers in citing all the code and case references, but will summarize my assessment, before going into some details, by saying that this DEIR falls considerably short of the basic intent and purpose of exploring potential environmental impacts of the proposed project, and therefore also falls short of exploring feasible mitigation measures, reasonable and feasible project alternatives, and informing the affected community, and the decision makers who will use this information.

In view of the significant and serious omissions and errors in numerous sections of the the draft environmental impact report (DEIR), the environmental impact report consultant(s) should incorporate revisions based on omissions and inadequacies stated herein and in other comment letters submitted in response to the DEIR and re-circulate the DEIR for public comment. Revisions should be made and recirculation should occur under the California Environmental Quality Act (CEQA) Guideline Section 15088.5. The errors and omissions are of a significant nature that would require re-circulation under Section 15088.5.

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

I. SUMMARY, ENVIRONMENTAL SETTING, PROJECT DESCRIPTION & OBJECTIVES

The project description is inadequate, vague and misleading.

The courts have noted that an accurate, stable, finite project description is an essential element of an informative and legally sufficient EIR under CEQA (*County of Inyo v. City of Los Angeles (1977)*).

The DEIR reveals that this project is highly speculative, appearing to be without a bona fide plan to construct the homes in place at this time. If one were to just read the "summary" section, this would not necessary be revealed and you would assume the construction plan was in place and that this was just a nice little "housing construction" project on some big swath of land (wow, where did they find that). However, if you were to read further into the "project description" section, you will find a statement about the phasing of the plan being subject to real estate market conditions (DEIR III-7). *"As currently proposed, Development Areas A and B would be graded and constructed independently. A construction-phasing schedule has not been developed at this time, since the timing is a function of demand in the marketplace at the time of construction. However, for planning purposes, the following discussion represents current scheduling expectations for grading and construction. It is anticipated that construction of the proposed project would last approximately 60 months (beginning in 2004 and completing in 2009).*

This becomes even more troublesome in light of having heard the applicant's representatives contradict the notion in public meetings. At the Sunland-Tujunga Neighborhood Council ("STNC") meeting of November 12, 2003, Mr. Percell's response to an attendee's question of whether or not any homes would actually be built by the project applicant, or if the land was to be sold after grading and installation of infrastructure, to the best of my recollection was that "they weren't sure but at this time they are thinking that they will". This response differed from prior discussions with area residents that indicated that they in fact did not think that they would be involved in the actual construction phase. **This uncertainty supported by the lack of discussion of the full extent of the construction impacts in sections of this DEIR constitutes corroboration of an inadequate project description by itself, although more issues will be discussed.**

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

Based on the summary section, in addition to the lack of a bona fide plan to actually construct houses, you also wouldn't necessarily see any of these significant issues:

- **There is little, if any, existing infrastructure** near the proposed site, requiring the extension and installation of sewers, electricity, water, natural gas, and two 1.5 million gallon water tanks with pumping stations. The extension of the sewer line to the project site alone is nearly a mile.
- **Massive grading will occur** (somewhere between 4.6 to 5.5 million cubic yards) over an estimated period of 19 to 28 months and significant landform alteration. (You do find some abstract mention of grading & blasting in certain discussion so mitigation measures, but not even a brief indication of the *extent and duration which is what makes it particularly significant*.)
- **The proposed project exists within an area of High Wind Velocity** which is well known to anyone with a passing acquaintance to the geographic region. This is a Santa Ana wind tunnel which will present serious challenges to some of their proposed mitigation measures, rendering some of them relatively ineffective, as well as introduce potential negative impacts when combined with the proposed project. (Don't worry, the grading operations will take place during the dry weather periods of October 15 to April 1). See Exhibits D1,D2,D3
- **The proposed project is entirely within a "Significant Ecological Area"**. You are not introduced to that fact until page II-5 of the "environmental setting" description where it is dismissed as a "county policy" and refers you again to the Land Use section where it dismisses it again in the same way. (Refer to the letter in the Technical Appendices from the County describing the SEA and the wildlife corridor and encouraging the City's collaboration with the SEATAC which was apparently ignored like most other letters in the NOP response section).
- **Sound walls** will be constructed to shield the project from freeway and/or highway noise
- **The proposed project is NOT compatible with the existing Land Use plan**, (although they incorrectly assert that it is) and they are requesting a MAJOR PLAN REVIEW.
- **How much of the land** involved in the proposed project, or other land in the region, is actually owned or controlled by the applicant (or who else owns and controls any of the land included in the project.)
- **Emergency response personnel face very considerable challenges to reach the proposed project site.**
- **Police and Fire departments stated the project will be a significant impact in the area.**

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

- There is an indication from some of the property owners neighboring the project site that **there may be unresolved property boundary disputes**. This was not disclosed in the DEIR.
- The **693 acres of "open space"** does **not** translate into "**undisturbed**". You must look to page III-8 to see that at least 111 acres of it will be "modified open space" and other adjustments which are only revealed by fishing through contradictory descriptions of the acreage in various impact category discussions.
- How **tax dollars will be spent** when any number of **geological hazards** occur and cause significant damage to the homes. There should be exploration of setting up a separate tax district or something similar to a "Geological Hazard Abatement District" to protect the taxpayers from such ill sited development projects. See Exhibit E1,E2
- There is **no analysis** of Emergency Medical personnel (**paramedics**)

What you **would** see in the Summary section, however, is:

- It's **no big deal** to them that the site is within a **Very High Fire Hazard Severity Zone (VHFHSZ)**. See Exhibits D1,D2,D3
- They think that an adequate **mitigation measure** within a project site where they emphasize time and time again the "preservation" of so many acres of **relatively undisturbed and important native habitat** is to **plant grasses** (DEIR I-10, item A-7). It does not specify to use any native grass species. Non-native grasses are among the very worst "alien invasive species" which threaten eco-systems. **That should also help them retain their status as a Very High Fire Hazard Severity Zone!** See Exhibits F1, F2, F3
- A big part of the **mitigation plan regarding runoff pollution** is completely unenforceable because it's to essentially **tell people to not do bad things** and they'll even post signs.
- **Particulate Matter and NOx** emissions would be significant, but since nobody will be around, it will not be significant, besides they'll stop grading when the wind blows and they will not drive very fast to stir up dust. See Exhibits G1, G2, G3, G4
- They have **insufficient data** regarding possible effects of living within such close proximity to the **Electro Magnetic Field (EMF)** associated with the SCE transmission lines running straight through a large portion of the proposed development site, so that renders it less than significant. Buyer beware! The mitigation is disclosure.
- **They incorrectly assert that the project is compatible with the existing Land Use plan and they claim compliance with a Draft "Scenic Plan" which is yet to be determined since it was still undergoing the process of being written into operational language at the time the DEIR was prepared.**

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

- The applicant's listed address is that of a prominent lobbyist firm registered with the LA Ethics Commission.

The consultants have demonstrated considerable ignorance and indifference regarding the environmental setting that would be impacted by the proposed project.

A. CEQA guidelines 15125(c) state "Knowledge of the regional setting is critical to the assessment of environmental impacts. **Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project.** The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." (emphasis added)

Regarding subsection (c), in *Antioch v. Pittsburg* (1986) 187 Cal. App. 3d 1325, the court underscored that mere conformity with a general plan (in and of itself) will not justify a finding that the project has no significant environmental effects. In the instant case, a developer sought a site development permit from the City of Pittsburg and the initiation of an assessment district for the construction of major infrastructure for three parcels of land. Although consistent with the general plan, the court found the project level environmental review to be inadequate and ordered an EIR prepared. Subsection (c) further emphasizes the importance of examining the project in its regional context. This is intended to ensure that the environmental setting is comprehensively described.

Yet, the DEIR environmental setting description (II-5) only devotes two sentences to the fact that the entire project site is within the County of Los Angeles Verdugo Mountains Significant Ecological Area (SEA) No. 40, and does so only with the purpose to dismiss it as unimportant since it is a "County" policy. With the pressure for development encroaching into more sensitive and significant ecological areas in the region, each remaining "SEA" becomes an even more significant, not less significant, opportunity or responsibility for conservation when viewed in context.

Here is a key description of this SEA from a letter which has apparently been completely ignored from the County of Los Angeles Department of Regional Planning Department (see appendices). "Status: In general, only dirt roads, firebreaks, transmission lines, and structures such as isolated houses, radio towers, and water tanks have lightly impacted the area. A paved road through La Tuna Canyon traverses the area. The Foothill Freeway (Interstate 210) crosses the northern edge. However, present human use of the area has been low and has not significantly affected the natural resources found here."

On page II-1, the DEIR rather accurately describes the project site as follows: "...the Verdugo Mountains remain a largely undeveloped island of steep terrain. Much of the

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

higher elevations of the Verdugo Mountains have been preserved as permanent open space through public acquisitions”.

The DEIR should discuss whether the intensive land use changes proposed by this project would forever remove this area from inclusion in the proposed “Rim of the Valley Corridor” addition to the Santa Monica Mountains National Recreation Area as is currently under study in accordance with H.R. 407 (2003 – Schiff, Feinstein). The U.S. Senate voted unanimously in favor of the Rim of the Valley Study Act in April 2003. Several environmental organizations also support the Rim of the Valley Corridor Study Act, including the Altadena Foothills Conservancy, the California Wilderness Coalition, Scenic America, and the Angeles Chapter of the Sierra Club, as well as the cities of La Canada Flintridge, Glendale, Pasadena, and South Pasadena. In the House of Representatives, the Rim of the Valley Corridor Study Act enjoys bipartisan support from cosponsors, California Reps. Howard Berman, David Dreier, George Miller, Brad Sherman, Buck McKeon and Hilda Solis.

To implement major land use changes in order to permit the density of development and installation of infrastructure proposed by the project would most likely permanently exclude this section of the Verdugo Mountains, previously undeveloped, from being included in this potentially important initiative which could benefit many in the region and assist the City in meeting it’s goals, objectives, and policies of it’s Open Space and Conservation Elements of the General Plan in a manner which avoids the substantial negative impacts being proposed by this project.

From the City of Los Angeles’s Framework Element:

Chapter 6

Open Space and Conservation

INTRODUCTION AND SUMMARY OF ISSUES

INTRODUCTION

The Framework Element contains goals, objectives, and policies for the provision, management, and conservation of Los Angeles’ open space resources, addresses the outdoor recreation needs of the City’s residents, and are intended to guide the amendment of the General Plan’s Open Space and Conservation Element. As established by the State legislature, “open space” is defined at a broader level than the traditional zones that have been used by the City. It encompasses both publicly- and privately-owned properties that

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

are unimproved and used for the preservation of natural resources, managed production of resources, outdoor recreation, and protection of life and property due to natural hazards. The inclusion of policies affecting private open space in this Element should not be interpreted to mean that the City intends to change fair market values or purchase such land.

The Framework Element's Open Space and Conservation policies also examine unconventional, non-statutory ways that the City of Los Angeles may create and utilize open space, particularly in parts of the City where there is a significant deficiency of this resource. These open space policies therefore address matters of land use, urban form, and parks development; subjects that are also addressed in other chapters of this document.

SUMMARY OF OPEN SPACE CHARACTERISTICS AND CONDITION

Although Los Angeles has open space resources located throughout its many neighborhoods, the City is properly characterized as an urbanized area framed by open space. The Pacific Ocean, San Gabriel Mountains, Santa Susana Mountains, Baldwin Hills, and the Santa Monica Mountains are examples of natural open space resources that bound the City and help define its geography and influence its development patterns.

Within these open space areas, a wide variety of environmental and recreational activities take place: from bird-watching to horseback riding, making Los Angeles unique among cities of its size.

Economic, social, and ecological imperatives require that Los Angeles take full advantage of all existing open space elements in the City, and create an extensive, highly interconnected Citywide Greenways Network. The economic dimension of this proposition is based on the development of places of pride and amenity that will maintain and augment property values, attract new investment, and establish greater economic stability in the neighborhoods. The social dimension is founded on the availability and distribution of open space resources to all residents of the City, on the way in which open space can instill and/or increase pride of place, and on the ability of open space to connect neighborhoods and people throughout the entire City. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

The City's open space policies seek to resolve the following issues:

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

1. *Open space conservation and development are often competing goals.*

Conserving ecologically and aesthetically important areas while meeting the needs of the developing community can create some difficult choices. **During the 1980s, Los Angeles County created a network of Significant Ecological Areas (SEAs) to save remnants of the State's natural heritage. The status of many of these SEAs is not known to County officials, however, because very few resources were available to monitor and preserve them.** Despite this lack of information, it is clear that development such as housing construction, commercial projects, roads and landfills has encroached upon many of the SEAs. Given that the City is largely built out, the pressure for development to intrude into these areas will likely continue.

2. *There is a deficiency of open space in the City.*

As the City urbanizes, and the pressures of population growth and encroaching development activity increases, the amount of land available for open space continues to diminish. The difficulty in acquiring large, contiguous tracts of land reduces the likelihood of creating new regional parks the size of Griffith Park or smaller community and neighborhood parks. In addition, there are insufficient local funds to purchase open space land.

3. *The Los Angeles River presents numerous opportunities for enhancing the City's open space network.*

Since the Los Angeles River and its tributaries pass through much of the City, they could become the "spine" of the Citywide Greenways Network. Where appropriate, these waterways could be developed as places for outdoor recreation and become amenities in the communities through which they pass.

4. *Park acquisition is limited due to existing patterns of development and lack of funding.*

Since the availability of open space acquisition funds is based in part on local development activity, areas of Los Angeles that experience little or no development have more limited resources to acquire open space. Not surprisingly, such communities are often also the areas with the greatest open space need.

The City has traditionally acquired open space through Quimby fees,

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

park dedication requirements, and a dwelling unit construction surcharge. Quimby fees differ from the construction tax in that they are collected from development projects and must be spent in the community in which they are collected. Some areas of the City are recipients of both the Quimby fees and the construction surcharge fee. Older areas of the City in which little new residential development occurs receive considerably lesser levels of funds and are characterized by the highest development densities. Discrepancies in the amount of open space that exists among communities results in the more densely populated areas having insufficient open space to meet the needs of their population.

5. *Park standards do not reflect current conditions and needs.*

Standards for various categories of parks, which were created when the availability of open space was not as limited, should be re-examined in view of changing population and urban form dynamics. If the population continues to grow and the amount of open space available remains more or less the same, the discrepancy between what is and what should be will continue to widen.

Existing open space standards (and, more significantly, existing open space acquisition policies) do not sufficiently recognize the full range of potential open space resources at the neighborhood and community levels. As opportunities for traditional open space resources are diminished, it is important to identify areas of open space that have not traditionally been considered as resources. Thus, vacated railroad lines, drainage channels, planned transit routes and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of City residents in communities where those resources are currently in short supply. **Additionally, as resources diminish, the quality, intensity, and maintenance of existing open space (especially in more dense neighborhoods) becomes more important.**

GOALS, OBJECTIVES, AND POLICIES

The following presents the goals, objectives, and policies related to open space and conservation in the City of Los Angeles. Programs that implement these policies are found in the last chapter of this document. Programs are also referenced after each policy in this document.

GOAL 6A

An integrated citywide/regional public and private open space system that serves

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

and is accessible by the City's population and is unthreatened by encroachment from other land uses.

RESOURCE CONSERVATION AND MANAGEMENT

Objective 6.1

Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.

Policies

- 6.1.1** Consider appropriate methodologies to protect significant remaining open spaces for resource protection and mitigation of environmental hazards, such as flooding, in and on the periphery of the City, such as the use of tax incentives for landowners to preserve their lands, development rights exchanges in the local area, participation in land banking, public acquisition, land exchanges, and Williamson Act contracts. (P2)
- 6.1.2** Coordinate City operations and development policies for the protection and conservation of open space resources, by:
- a. Encouraging City departments to take the lead in utilizing water re-use technology, including graywater and reclaimed water for public landscape maintenance purposes and such other purposes as may be feasible;
 - b. Preserving habitat linkages, where feasible, to provide wildlife corridors and to protect natural animal ranges; and
 - c. Preserving natural viewsheds, whenever possible, in hillside and coastal areas.
(P2, P9, P59, P60)
- 6.1.3** Reassess the environmental importance of the County of Los Angeles designated Significant Ecological Areas (SEAs) that occur within the City of Los Angeles and evaluate the appropriateness of the inclusion of other areas that may exhibit equivalent environmental value. (P2, P59)
- 6.1.4** Conserve, and manage the undeveloped portions of the City's watersheds, where feasible, as open spaces which protect, conserve,

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

and enhance natural resources. (P2, P8)

- 6.1.5** Provide for an on-site evaluation of sites located outside of targeted growth areas, as specified in amendments to the community plans, for the identification of sensitive habitats, sensitive species, and an analysis of wildlife movement, with specific emphasis on the evaluation of areas identified on the Biological Resource Maps contained in the Framework Element's Technical Background Report and Environmental Impact Report (Figures BR1A-D). (P2)
- 6.1.6** Consider preservation of private land open space to the maximum extent feasible. In areas where open space values determine the character of the community, development should occur with special consideration of these characteristics. (P70)
- 6.1.7** Encourage an increase of open space where opportunities exist throughout the City to protect wild areas such as the Sepulveda Basin and Chatsworth Reservoir. (P1, P2, P59)

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

The control and/or ownership of at least some of the property included in the proposed project is in question based on property records as compared to the data available in the DEIR, and this also introduces much uncertainty into many aspects of possible impacts. Evidence of ownership in the way of Assessor's Parcel Numbers (APN's) has not been disclosed in the DEIR.

It is unclear as to whether the actual project applicant is correctly stated, in that there may be agreements with related or unrelated third parties that are a material part of the project and which may represent a significant contingency sufficient to be considered as "co-applicants". This also calls into question whether these "third parties" may be taking advantage of the opportunity to register their support for the project into the public record in anonymity so that it appears that just another independent community member or landowner is supportive of the proposal, when they actually have a vested interest in the approval of the project.

In light of all the data both included and omitted, this document seems to indicate:

1. A General Plan change (local land use element), circulated incorrectly under the misleading description of a single (yet complex) subdivision proposal. A lot of the community probably tossed any and all of the slick marketing materials from the public relations firm into the trash with the rest of the junk mail. Many members of the community have not been informed as to the significance of the implications of this project's proposals.
2. A public benefit project and private enterprise all rolled into one. It seems as though the goal is to generate enough profit from the private enterprise to enable them to fund the acquisition of additional land for dedication as public open space to possibly fulfill "statistical" open space requirements not otherwise met by the City, while at the same time opening up the plan area for denser development.. This is of course, not known, but to an ordinary layperson, it is the impression conveyed when considering the interrelationship with the uncertainties.

It's even more troublesome when viewed in light of the mystery surrounding the project applicant. The address listed for the applicant is that of a prominent lobbyist firm, registered with the City of Los Angeles Ethics Commission, although (Whitebird, Inc, is not found currently listed as a registered client of lobbyist activities under this firm):

Consensus Planning Group Inc

May 19, 2003

Playa Capital Co LLC
St Joseph Center
Trammell Crow Residential

Consensus Planning Group, Inc lists a number of large and esteemed organizations as clients in their own marketing materials, including the Southern California Association of Governments (SCAG) and the City of Los Angeles Community Redevelopment Agency.

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

Objectives

Since project objectives are essentially subjective, rather than fact based, but are included as part of this review process, I have no choice but to comment on them in generally the same fashion here. One stated objective, however is very easy to see cannot be met by any project or alternative thereto. I refer to the following statement:

“To locate the residential development in proximity to existing infrastructure and services where possible.” Boy, did they pick the wrong site!!! There is virtually nothing there.

Most of these arguments of de facto altruism appear to set up a vague statement of rubber-stamp-ready “overriding considerations” regarding “housing needs in the City”, implicitly begging permission to impose negative externalities upon the existing community by materially changing the existing land use plan to draw population from other areas into this community under the guise of a single development (albeit a large single development within the context of this community). Anyone seeking to subdivide land can easily use the same arguments of wanting to provide “badly needed housing”. To focus on altruistic ideals, with only a brief mention of “financial viability” within the project objectives is disingenuous. Financial viability must logically be the most essential objective for a group of real estate investors proposing to subdivide and sell land, particularly that within a geographically unsuitable location and it hasn’t been well established how much of it they own or control. However, “space”, aka “land” is not an inexhaustible resource and even after the last foothill has been shaved and the last canyon filled, there will still be innumerable people in need of a decent place to live. The exhaustive references to “housing needs” in the objectives stated in the DEIR seem to indicate that it is the City of Los Angeles itself, not the speculative land investor group, who is the true applicant of this project. Even if that is not true, why should the reference to only one element of the General Plan be considered as paramount over all other elements which are also the responsibility of the local government. It as if to say “well, we need more houses, so pretense of compliance with the other elements shall be sufficient”. **The assessment of many of the impacts are built upon assumptions, the foundation of which is presumption of meaningful implementation of other elements of the General Plan, including but not limited to Noise, Transportation/circulation, Safety, Public Services, Air Quality, Open Space and Conservation.** It’s sad to say that history has shown, as do the current circumstances, that this is not necessarily reality and the City is not fulfilling many of it’s primary responsibilities to the health, safety and overall well being of the citizens. Our tax dollars go to support staff in the Planning Departments to ease major developers through the process, but the ordinary citizen is not given the time of day. By no means should the health, safety, and well being of the citizens who already reside in any community, including Los Angeles, be viewed as subordinate to the needs of persons who do not yet live here and whom the commercial interests seek to attract for their own financial gain. To imagine that the issues are

Rhonda Herbel
7647 McGroarty St.
Tujunga, CA 91042

December 29, 2003

mutually exclusive is for the local government to abandon the broader responsibility to the citizens. Their arguments for this project don't speak to the biggest challenge faced by local government in the face of the ever increasing problem of overpopulation which is maintaining the decent places to live which people already have here and which this project will serve to take from them by way of the impacts it will impose, just as has happened in so many other communities in the Los Angeles region which now suffer from any combination of unbearable traffic, congestion, pollution, noise, blight and an utter lifelessness and bleakness that breeds only despair, conflict and crime. Projects such as this suggest that only the wealthiest who arrive last in a community are entitled to a decent environment in which to live their daily lives, as they can use their considerable financial resources to persuade the local government to take a quality living environment from the less affluent who preceded them. **I believe this may be in violation of the basic intent of California's Environmental Justice law.** Further, one of the biggest crises in the Los Angeles region is not the lack of housing, but the lack of "affordable" housing. Although I don't quite see how a local government can seek to control the dynamics of the real estate market, this project certainly does nothing to promote the attainment of that goal. In fact, if anything, it may serve to inflate the prices of the neighboring existing homes which, up to this point, have tended to lag behind the inflation of the Los Angeles real estate prices in general. On the subject of choices, indeed, if you investigate why many people chose to live in this community, you will find that it is the physiological benefits of the environment and proximity to wildlife afforded by the Verdugo or San Gabriel mountains on either side of the Foothill corridor, or the relative affordability of the homes, or combination thereof. It is truly one of the best opportunities in Los Angeles for young families with children, or other individuals with lower income levels, to be able to afford a decent home in a decent environment. Logic suggests it would be very expensive to undertake such a huge grading project in such a geographically inappropriate site, thereby resulting in relatively expensive homes. I cannot see the greater good in considering the destruction of a Sensitive Ecological Area in order to install expensive luxury homes. It seems to me that the applicant should have considered a more appropriate area for a housing development, and the City of Los Angeles should have long ago seized the opportunity to satisfy important open space and conservation goals by protecting this SEA. (Before you write me off with the tired label of "NIMBY", consider that it is normally reserved for referencing individuals who are against having affordable housing in their neighborhood, when our neighborhood is already, by definition, "affordable".)