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The City of Los Angeles
Department of City Planning
Environmental Review Section
200 North Spring Street, Room 763
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES

DEC 31 2003

**ENVIRONMENTAL
UNIT**

Attn: Ms. Maya E. Zaitzevsky, Project Coordinator

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

The City of Los Angeles has issued a Draft Environmental Impact Report (DEIR) for the Canyon Hills Project. This is a proposed development on an 887-acre parcel located in the Verdugo Mountains of the northeast San Fernando Valley. I am submitting the following comments in review of this Draft EIR.

I. The Project Description is Inadequate, Incomplete and Inaccurate

Other than a general, vague description there is no quantitative information to locate this property. "The Canyon Hills project site includes approximately 887 acres of land and is located at 8000 West La Tuna Canyon Road in the City of Los Angeles. The project site is located entirely within the Verdugo Mountains in the northeastern San Fernando Valley."

175-1

The project description must be complete, accurate, and consistent throughout the DEIR. If the project description is incomplete, inaccurate, confusing, truncated or misleading, the usefulness of the DEIR as a document will be impaired. [*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 729-734; *Kings County Farm Bureau v. City of Handford* (1990) 221 Cal.App.3d 692, 736-738; *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193.]

175-2

There are no Assessor Parcel Numbers (APN) given to identify this "irregularly-shaped property". Figures III-1 (Site Plan) and III-2 (Site Plan Detail) have no map coordinates or any grid references, thus it is impossible to establish exactly where this property exists. Without all the APNs, the accuracy of the Site Plan is questionable, especially given the shape of project site. Without the APNs it is impossible to determine the property boundaries or if the applicant owns or controls the land discussed in the DEIR.

This is not a theoretical question, since there are several boundary questions concerning this property. The DEIR makes repeated references to a disputed boundary at the southern portion of the project site, adjacent to the proposed equestrian park. In the existing neighborhood located northeast of proposed "Development Area A" a property owner at Reverie Road has determined that the applicant is claiming some of his property as part of their project site.

175-3

Additionally, even though the Site Plan is not a reference map it is possible to determine from it that the project site shown is incomplete. The applicant owns or controls additional parcels in the 7400-7500 blocks of Verdugo Crestline Drive that are not included in Figures III-1 or III-2. These parcels are bordering the proposed development and have been omitted from the project site.

175-4

The Site Plan and other maps in the DEIR show a cul-de-sac road that is on the Duke Development property. Since the DEIR states that the applicant does not own or control the Duke property, an explanation must be given why this road is included as part of the Canyon Hills project.

175-5

The Applicant is not properly identified in the DEIR. It is stated as:

Whitebird, Inc.
c/o 444 S. Flower Street, Suite 1300
Los Angeles, California 90071
Richard Percell

This address is for Consensus Planning Group, a public relation firm and consultant for Whitebird, Inc. The applicant Whitebird, Inc. is listed by the City of Los Angeles Ethics Commission with a location in Arlington, Texas. Further research discloses that Whitebird, Inc is a Nevada Corporation with officers in Arlington, Texas. As of the date of the publication of the DEIR (October 2, 2003) there is no record that this corporation was licensed to conduct business in the State of California.

175-6

The applicant's information in the DEIR is incomplete and misleading and must be completely and accurately provided. Why is the applicant apparently unwilling to disclose its identity in this document? It should also be verified that the applicant is legally entitled to proceed with this project otherwise this entire document is a moot point.

Additionally, to satisfy CEQA's requirements, a DEIR "must consider a reasonable range of alternatives to the project, or to the location of the project" [*Citizens of Goleta Valley v. Board of Supervisors (Goleta II)* (1990) 52 Cal.3d 533, 566] The DEIR states that "Alternative sites were not analyzed because the project applicant does not own or control other property within the City that satisfies the objectives for the proposed project." This is an insufficient and self-serving statement, allowing the applicant to define a project that will only apply to one specific location that they hope to develop. If the applicant owns or controls land that is similar to the project site, such as additional property in the Verdugo or San Gabriel Mountains, this must be presented to comply with CEQA requirements regarding the range of alternative projects.

175-7

Off-site alternatives should not be restricted to the City of Los Angeles, especially since this project is virtually at the edge of the LA City limits and is adjacent to the Cities of Glendale and Burbank and unincorporated areas of Los Angeles County.

175-7

Due to the above deficiencies:

- The DEIR must list all the APNs for the Canyon Hills project site
- An accurate site map must be provided showing the project’s precise location
- A survey must be conducted of the project site to determine the accuracy of the property boundaries
- The applicant must disclose all property that they own or control in the County of Los Angeles that are currently undeveloped and list the APNs of all such additional property holdings.

175-8

175-9

175-10

175-11

According to CEQA Guidelines, one of the fundamental purposes of an EIR is to provide public decision-makers with enough meaningful information “to make a decision which intelligently takes into account environmental consequences.” The Draft EIR states that it “includes a detailed description of the proposed project” However the cornerstone of this description, the actual proposed parcels lots and related improvements, is again vague, incomplete and inconsistent. This is especially relevant since the applicant is asking for approval of a General Plan Amendment and Zone changes.

The only information describing the Canyon Hills development is:

“The project proposes to cluster all residential development onto approximately 194 acres in the eastern portion of the project site.” and “The proposed homes would have lot sizes ranging between approximately 9,000 and 39,000 square feet and would be two stories high” and “approximately 693 acres of the 887-acre project site would be permanently preserved as open space.”

Table III-1 shows that the 280 building pads would be Custom (40), 90 x 115 feet (129), 80 x 115 feet (69) and 70 x 115 feet (42).

175-12

Table III-3 and Table IV.G-5 (Proposed Zoning Designations) show that there would be 626 acres of A1 Agricultural, 24 acres of A1-K Equestrian, 147 acres of RE9-1-H Estate (9,000 square feet) and 90 acres of RE11-1-H Estate (11,000 square feet).

This is all the information provided and it is unnecessarily cryptic and convoluted. A clear and detailed map must be provided showing the exact locations of each of the proposed RE9, RE11 and A1 lots. A map must also be provided showing the exact locations of each of the proposed 280 building pads and the “steep and winding roads”. Without knowing how or where this proposed development is situated it is impossible to properly evaluate other parts of the environmental review such as geologic hazards, water drainage, grading, biological impacts, visual impacts, cultural resources, public health risks and compliance with the Sunland-Tujunga and Sun Valley-La Tuna Canyon Community Plans.

The “permanent preservation” of open space is repeated throughout the DEIR as a justification and benefit of this project. The DEIR frequently states that approximately 693 acres would be permanently preserved as open space without specifying how this would be accomplished. The applicant will also be asking for 237 acres to be re-zoned as RE9 and RE11. If the project site is actually 887 acres and there are no plans to develop the 693 acres that are asserted to be permanent open space, then why does the applicant need 237 acres re-zoned for higher density? It would appear that only 456 acres would not be developed for this project. There is also no guarantee that these 456 (or 693) acres will not be developed in the future.

175-13

A straightforward and accurate representation of this project is not provided. Such a fundamental part of the DEIR must be given in clear language with accompanying maps that are understandable to the general public. It shouldn't be necessary to search through multiple sections of a long document with a topographical map, calculator and copy of the LA Municipal Code to understand what is being proposed.

175-14

The Project Description alone is seriously deficient and must be rewritten to provide meaningful information for both the public and the decision-makers who will ultimately be deciding the merits of this proposed project.

II. The Review of Significant Environmental Impacts is Inadequate and Incomplete

The following sections have deficiencies that must be corrected:

IV.B. AIR QUALITY

According to CEQA Guidelines, a DEIR needs to disclose and discuss any potential related health problems.

It is known that auto exhaust emissions are a major source of air pollution and prolonged exposure to auto emissions constitutes a serious health hazard. There are at least 20 homes proposed within 500 feet of the centerline of the 210-Freeway [Appendix H, p 9] yet there is no analysis the impact this will have on the future residents of Development Area A or B. In the Air Quality Section it states “Sensitive receptors may warrant additional mitigation. Facilities and structures where sensitive people live or spend considerable amounts of time are known as sensitive receptors.”

175-15

The EIR is deficient in this section and must measure the pollution levels from the auto emissions from the freeway and other roads, describe in detail where the proposed building pads are located by the freeway and La Tuna Canyon Road and analyze the health hazards that residents would be exposed to. This is especially important for infants, pregnant women and people with respiratory conditions.

While an entire paragraph in the Air Quality section is devoted to odors resulting from the proposed equestrian park, which only purpose seems to be to restate the assertion that an adjacent property owner has encroached on the project site, it is a serious omission that this section does not even mention the serious public health risk from auto emissions. Since these hazards are not discussed or disclosed, there are no mitigation measures proposed. The DEIR must correct this omission, study this hazard and mitigate if necessary any health threats. This would require scientific measurement and review that is not included in the DEIR.

175-15

Even the possible alternative of moving some homes away from the 210-Freeway would still require further scientific analysis to be adequate and ensure that the location of all the proposed homes do not place any residents in jeopardy from air pollution.

IV.C. HYDROLOGY AND WATER QUALITY

Runoff from both development areas will eventually drain into La Tuna Canyon Wash. The DEIR does not describe the flow capacity of La Tuna Canyon Wash or the historic flooding problems downstream on La Tuna Canyon Road. Storm water runoff from the new impermeable surface areas in Areas A & B (streets, sidewalks, etc) will impact both these areas and needs to be discussed in detail.

175-16

Detailed site drainage plans and descriptions of the other drainage and debris control facilities must be included. The storm drain system needs to be specified since "Project site development would result in minor alterations of drainage patterns, due to the construction of a storm drain system." The conclusion that no mitigation is required in this area is impossible to determine without prior review of these plans.

175-17

IV.G. LAND USE

This section has many inadequacies and misrepresentations, many of which are addressed in comments submitted by Canyon Area Preservation, the Sierra Club and other individuals. However, the following inaccuracies should be noted:

175-18

The EIR references LAMC regarding equestrian properties. Though RE11 zones permit horse keeping, it requires 17,500 ft sq lots for a horse and 20,000 ft sq lots for a stable. Table IV.G-5 shows that the RE-11-E lots would be 11,000 ft sq, thus these would not be adequate for horse keeping. The description of RE11 zoning regarding horse keeping is misleading in context of the proposed development. The rezoning of these lots is incompatible with the Sunland-Tujunga Community Plan's goal of preserving the equestrian and rural nature of the area.

Verdugo Crestline Drive runs through the project site and the houses at 7675 and 7717 would be cut off from the existing community by a locked gate. The conclusion that there will be no community division is incorrect.

175-19

Consistency with Land Use Plans, Policies and Regulations: Sunland-Tujunga Community Plan

Table IV.G-4 [*italics* are sections of the Sunland-Tujunga...Community Plan that are omitted]

1-3.3 **Inconsistent** with preserving existing views of hillside and mountainous areas. 175-20

- The DEIR states “The majority of the cut pads proposed in the development plan are situated along ridgelines”

- The Draft Specific Plan referred to is unenforceable, has been changed since September 2002 and is not relevant until it becomes an ordinance.

- There are no specifics in the DEIR on how or if the 693 acres would be preserved as permanent open space.

1-5.1 **Inconsistent:** A private gated community of luxury homes does not promote greater individual choice in housing. 175-21

Objective 1-6: (To limit residential density and minimize grading in hillside areas) The project is inconsistent with this objective by proposing major changes to existing land-use designations and zoning, with resulting significantly higher density. The project does not provide an alternative that is consistent with the community plan and relevant LA City land-use ordinances. 175-22

1-6.3 **Inconsistent:** The proposed road in Drainage Area 4 will significantly impact a sensitive riparian area. 175-23

1-7.1 Place a high priority on the preservation of horsekeeping areas. **Inconsistent:** The proposed zone changes to RE-9 & RE-11 would not allow for horsekeeping and would permanently withdraw approximately 200 acres from equestrian usage. 175-24

1-8.1 **Inconsistent:** A 3-acre equestrian park with space for two horse trailers doesn’t provide much for the community. The proposed residential density is much higher than the surrounding residences. 175-25

1-8.2 **Inconsistent:** The proposed project would not be a horsekeeping area, as the land is currently designated. 175-26

Objective 5-1: To preserve existing open space resources – the proposed development is inconsistent with all policies of this section. 175-27

14-1.1 **Inconsistent:** The proposed bike paths are within a private, gated community and not accessible to the public. 175-28

14-2.3 **Inconsistent:** The assertion that both Development Areas are too steep for horsekeeping is incorrect. There are many residential properties in Tujunga and Shadow Hills that have horses, corrals and stables in similar terrain. There are no plans for equestrian trails in Area A. 175-29

The statement that the proposed project’s land use impacts would be less than significant is obviously an incorrect conclusion. One of the core elements of the Community Plan is to preserve and expand equestrian properties; this project would permanently remove almost 200 acres from such usage. Another principle of the Community Plan is to preserve hillsides and the rural nature of the area: grading ridgelines by 80 feet and creating a development that is “perched on the land” is incompatible with these goals. 175-30

The DEIR does not show anywhere how many homes could be built in development areas A & B if the project fully complied with current land use designation, zoning and other elements of the LA Municipal Code such as the Hillside, Slope Density and Oak Tree Ordinances. This information is necessary for the public to evaluate the impacts of the proposed development and is one of the most serious deficiencies of this DEIR.

175-31

IV.H. POPULATION AND HOUSING

Project Impacts:

Direct Growth: The figure of 0.33 units/acre based on 280 homes on the 887-acre project site is misleading. Since there is no guarantee that the 694 acres will not be developed in the future, the direct growth figure should reflect the actual scope of the currently proposed project. The proposed development is 280 homes on 194 acres, which is 1.44 units/acre. This is one of numerous examples where statistics are manipulated to support a questionable conclusion. The DEIR contains many different figures about housing density and acreage depending on what point is trying to be supported in a particular section.

175-32

Indirect Growth: The statement that additional roads and infrastructure would not induce growth is incorrect. There are approximately 40 subdivided parcels adjacent to the northern portion of Area "A" on the 7400-7500 blocks of Verdugo Crestline Drive and 9700 block of Viewpoint Drive. These parcels are presently undeveloped, mainly due to the cost of bringing in needed utilities, sewers and other infrastructure. Several of these parcels have changed ownership repeatedly in the past 10 years because of the unforeseen infrastructure expenses involved.

- 25 of these parcels on Verdugo Crestline and Viewpoint Drives are owned by a single party who has expressed an interest in developing these properties if financially profitable. One of the greatest barriers to developing these properties, in addition to the cost of extending the sewer line, is the expense of improving these streets, which are currently substandard, unmaintained dirt roads.
- The sewer line ends on Alene Drive and the existing homes on Verdugo Crestline Drive are all on septic systems. Due to the geology of the area, septic systems for new homes are unable to be installed in compliance with current codes.
- The Southern California Gas line ends at the intersection of Verdugo Crestline Drive and Estaban Way. The homes at 7675 & 7717 are powered by propane and the house at 7600 is electric. The Comcast television cable line also ends at this point and the three residences to the west have been unable get cable service extended to their homes.
- DWP water service (meter) ends at 7451 Verdugo Crestline Drive. The homes at 7600, 7675 & 7717 are responsible for service and maintenance of their water lines.

175-33

The conclusion must be made that this development will induce growth in the immediate vicinity. Even if Development Area A was redesigned so the proposed houses and their utilities were not in proximity to these already subdivided parcels, if Verdugo Crestline Drive is ultimately used as the emergency access route for Area A, this alone would induce growth.

Currently the City requires a property owner to pave any unimproved dirt road as a condition of developing even a single parcel with one home.

175-34

If Verdugo Crestline Drive is paved for emergency fire access this would remove one existing barrier to development and provide a financial incentive for some of the current property owners to build additional housing.

175-34

The DEIR must examine how this project could induce the construction of additional housing at all the adjacent properties to Development Areas A and B. The omission of this analysis is a serious deficiency since growth-inducing impacts are a key element of adequate EIR review.

The project site is currently undeveloped open land. A community of 280 homes would be the largest residential development proposed for the area in decades. Most recent projects under construction or being proposed in the region are for between 10 to 60 houses. They also are located in existing residential neighborhoods or adjacent to prior subdivisions.

175-35

If approved, the size of this development will set a precedent for other projects of this scale. Other recent residential projects in the area did not impact several riparian areas, grade primary ridgelines, cut off important wildlife corridors, destroy so many mature oak trees or require the major changes in land-use designations and zoning that are being proposed for this project. The DEIR must address the Canyon Hills project's potential growth inducing impacts, which are significant and profound. The inadequacies in this section do not consider the consequences of suburban sprawl or help the decision-makers judge how this project conforms with the goals of the Sunland-Tujunga and Sun Valley-La Tuna Canyon Community Plans.

IV.I. TRANSPORTATION AND TRAFFIC

Project Impacts not adequately addressed in this section include the Emergency Access to Development Area A. The emergency access routes proposed are either Inspiration Way or Verdugo Crestline Drive which connect to Alene Drive and Hillhaven Avenue, ultimately connecting with Foothill Boulevard.

175-36

Inspiration Way and Verdugo Crestline Drive are substandard, unimproved dirt roads and not maintained by the City. Alene Drive and Hillhaven Avenue are currently too narrow to satisfy LAFD standards to accommodate emergency vehicles, as are Inspiration Way and Verdugo Crestline Drive.

This section states that Inspiration Way and Alene Avenue "can and would" be improved to comply with standards required by the LAFD. There is no explanation how this would be done or who would pay for these improvements. Inspiration Way can't be improved to provide a minimum 20-foot paved roadway without the city exercising eminent domain on currently developed residential properties. All of these properties adjoin the existing unimproved dirt road and some houses have no setback. The intersection of Inspiration Way and the site access can't be improved to provide the minimum 30-foot turning radius required by LAFD without condemning portions of current properties. Necessary improvements of both Inspiration Way and Hillhaven Avenue would also require relocating telephone and other utility poles.

175-37

Verdugo Crestline Drive would be improved where "As indicated on the project site plan, Verdugo Crestline Drive encroaches into the northerly portion of Development Area A."

175-38

It cannot be determined from the project site plan where this “encroachment” is located. (It also can not be determined from the project site plan where the northerly portion of Development Area A is located Verdugo Crestline Drive.) If this road is ultimately used for emergency access there is no commitment by the applicant that Verdugo Crestline Drive “can and would” be improved between Alene Drive and the northern part of Area A, an estimated distance of approximately ½ mile.

175-38

There is also no commitment that Hillhaven Avenue “can and would” be improved to LAFD standards.

175-39

An engineering study must be done to show whether these required road improvements can be actually be implemented. The City currently has a project to pave all existing dirt roads to comply with AQMD requirements. Both Inspiration Way and Verdugo Crestline Drive have repeatedly been evaluated by the City for street paving and determined to present serious “engineering issues”. The DEIR must analyze the impacts of improving these roads since this would require significant grading of hillsides and/or the filling of steep canyon slopes. The applicant must pay for all improvements of these roads, including the relocation of utility poles and reimbursement to land owners for loss of their property.

175-40

The intersection of Hillhaven Avenue and Foothill Boulevard is a stop sign, with no traffic signal. This intersection is inadequate to handle traffic during an emergency. During previous wildfires requiring evacuation of the residents in the existing community south of Hillhaven Avenue, traffic was diverted from Hillhaven at St. Estaban onto Commerce Avenue and the traffic signal at the intersection of Commerce and Foothill Boulevard. As condition of the approval of Development Area A, if Inspiration Way or Verdugo Crestline Drive are used for emergency access, a traffic signal must be installed at the intersection of Hillhaven Avenue and Foothill Boulevard. The applicant must also pay for this improvement.

175-41

The secondary emergency access for Development Area “A” through Woodward Avenue needs a more complete environmental review. As it is possible that the proposed access via Verdugo Crestline Drive or Inspiration Way are unfeasible, Woodward may be the resulting access road. Since Woodward is currently unimproved and uninhabited it wouldn’t impact any existing houses or infrastructure. The rationale that it would be “much less expensive” not to consider Woodward Avenue is not sufficient to reject this alternative and the DEIR should include the environmental impact of building a road there.

175-42

The Safety Review section is incomplete regarding the accident frequency on La Tuna Canyon Road. While acknowledging that a portion of this street is subject to hydroplaning and that road improvements were made in 1997, this road still has drainage and hydroplaning problems. A complete disclosure of the accident history of this stretch of road since 1997 must be included, as it is the main access from both development areas. If 2,694 daily trips are estimated to result from the additional population, there will not be a “small increase in traffic on this portion of La Tuna Canyon Road relating to the proposed project” The DEIR must address the safety problems that still exist on this road and mitigate these.

175-43

IV.J. PUBLIC SERVICES

The Public Services section is especially inadequate in its analysis and conclusions. The proposed mitigation measures do not address the identified problems. Proper resolution of police and fire safety issues and impact on other public services will require much additional infrastructure. These improvements must be financed by the applicant and not be paid for at taxpayer's expense.

175-44

The Cumulative Impacts in these sections refer mainly to Related Project No. 9, which is never identified in Section II.C except to say it's single-family residences in La Crescenta. It is impossible to evaluate the impacts of a related project without knowing what and where it is. The constant references to this unidentified project is confusing and misleading. If it is regarding the Oakmont View V development, that project has been withdrawn in December 2002 and is now a public park (The Verdugo Hills Open Space Preserve). The repeated reliance on an unidentified project to dismiss cumulative impacts is a serious deficiency in the DEIR and must be corrected. There are several residential projects in Tujunga, Sunland and Shadow Hills that are more relevant to these cumulative impacts and should be included.

175-45

• IV.J.1 FIRE PROTECTION

The project site exceeds the Fire Code's maximum response distance of for an engine company and a truck company. LAFD has said that the service ratio and response times for this proposed development are inadequate and significant. The only proposed mitigation for this is to install interior sprinklers in the proposed dwellings (Measure J.1-1), which is already required by building codes. This is clearly inadequate and serious safety issues are not rectified.

175-46

- *Response Distance and Access:* There is no data presented on fire department response time to either Area "A" or "B", and no mention of Paramedic response. The last page of this section says "Mitigation measures are provided below to ensure that adequate response time and access to the project site are provided". No such measures follow and must be included. Data for response time must also be included.

175-47

- *Emergency Access/Evacuation:* The proposed emergency access for Area "A" from either Verdugo Crestline Drive or Inspiration Way connect to Alene Drive and Hillhaven Avenue to get to Foothill Blvd. Neither of these streets can be expanded to satisfy LAFD standards to accommodate emergency vehicles, and can't be widened due to existing homes on one side and a canyon on the other. Further comments on this are in the Transportation and Traffic response of this letter.

175-48

• IV.J.2 POLICE PROTECTION

LAPD has suggested that "the proposed project could have a significant environmental impact on police protection services in the Foothill Area...the LAPD's concern related to safety stems from the current understaffing of the LAPD." The only new police station is one under construction in Mission Hills, which wouldn't address the staffing shortage in Foothill Division or provide additional police protection in the Sunland/Tujunga/La Tuna Canyon area.

175-49

In the Environmental Setting "...the project site is within Reporting District (RD) 1964." Development Area "B" is south of Interstate 210 and in a different RD, no data about this provided. This information must be included.

175-50

LAPD's preferred response time is 7.0 minutes, the Foothill Division average was 11.4 minutes, but no data is provided for RD 1964. According to a representative of the Foothill Police Advisory Board the average response time is for RD 1964 is currently 14.7 minutes, which is more that double the preferred standard of LAPD.

175-51

The DEIR concludes that "police units are most often in a mobile state; hence, actual distance between a headquarters facility and the project site is of little relevance." No data is provided on the distance from RD 1964 and Foothill Division Station, where patrol units have to file their police reports. The conclusion that the distance to the Foothill Station is irrelevant is incorrect. Patrol units that are filing their reports are not available to respond to emergency situations.

175-52

The DEIR looks mainly at the Foothill Division & LAPD in general, but the only specific data for RD 1964 are Crime Statistics. There is also no information on how many police units are regularly assigned to RD 1964. Mitigation Measure J.2-4 doesn't guarantee that mobile units will have access codes and/or keys to gated portion of project site.

175-53

This project will increase demand for police services, result in a reduction in services, lengthening of response times and strain already inadequate facilities. The DEIR must provide complete information about the police resources available for the proposed development including: how many units are currently assigned to patrol the area, the current and projected response times for patrol units, and all available LAPD data for the Sunland, Tujunga and La Tuna Canyon reporting districts. These facts are necessary for an adequate review of the police safety issues relating to the added population that will result from this project.

175-54

• **IV.J.4. LIBRARIES**

The proposed project would increase demand for service at Sunland-Tujunga Branch Library. LAPL has stated the additional residents from this development would adversely affect Sunland-Tujunga Branch Library. The DEIR identifies that 745.5 square feet of additional library space would be needed, but does not demonstrate how this will be accomplished. The Sunland-Tujunga Branch Library was re-built in 1995 with bond funds. Expansion of this facility is not feasible given the current footprint of the library and available funding.

175-55

The conclusion that proposed project wouldn't require physically altering existing library contradicts the previously identified adverse impact to Sunland-Tujunga Branch Library. Again, improvements to the local public library system must be financed by the applicant and not come from taxpayer dollars.

IV.L. UTILITIES & SERVICE SYSTEMS: WATER

This section states that “the proposed project would be required to provide two 1.5 million gallon tanks” however the location of these tanks are not given. Since these water tanks are generally described by elevation and approximate situation it can be inferred that the position of these units have already been determined and must be revealed. This section further notes that a new water main will be built along Inspiration Way. The construction of two 1.5 million gallon water tanks and new water mains through an existing community constitutes a major building project that is not analyzed in this document. The full environmental impacts of these improvements must be studied and disclosed.

175-56

III. General Deficiencies in the Draft EIR

Throughout this DEIR there appears to be a deliberate attempt to obfuscate basic facts, obscure the impacts of this proposed project and make it as difficult as possible for the decision-makers to determine the cumulative environmental effects of this project.

175-57

Several significant adverse environmental impacts that cannot be mitigated have been identified in this DEIR. According to CEQA Guidelines the DEIR must describe why this project is being proposed, in spite of these unavoidable significant environmental impacts. There is no such section in this DEIR.

There are many elements of this project that are not fully described and will be prepared at a later date. This circumvents the Environmental Review Process and is a serious deficiency in the DEIR. Additionally, “Lead and responsible agencies should not be allowed to rely on mitigation measures that will be formulated after project approval”. [*Kings County Farm Bureau v. City of Handford*, (1990) 221 Cal.App.3D at 728; *Sundstom v. County of Mendicino* (1988) 202 Cal.App.3d, at 306-308]

Some of these elements include:

175-58

Storm Water Runoff: “The proposed project will be required to submit site drainage plans to the City Engineer and other responsible agencies for review and approval prior to development of any drainage improvements...with the implementation of the approved drainage plans, no significant long-term operational impact from storm water runoff would be expected” This is inadequate and the conclusion that no mitigation is required is impossible to determine without prior review of the site drainage plans by the responsible agency. “Permanent drainage and debris control facilities shall be constructed to the satisfaction of the City Engineer.” This will be formulated after the project approval and again is inadequate.

Traffic (Emergency Access): “The emergency vehicle access plan, including the related onsite and offsite roadway improvements, is submitted for review and approval by the LAFD and the Bureau of Engineering prior to recording of the tract map.” If the emergency access plan is not approved by these agencies, alternative plans would require additional environmental review.

175-59

Fire Protection: Mitigation J.1-21 “Definitive plans and specifications shall be submitted to the LAFD and requirements for necessary permits satisfied prior to commencement of construction.” Why are these plans and specifications not disclosed in the DEIR?

175-60

Police Protection: Mitigation J.2-2 “The project developer shall submit a plot plan for the proposed development to the LAPD’s Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.”

175-61

IV. Conclusion

The cumulative deficiencies in the Canyon Hills Draft Environmental Impact Report require significant revisions to this document. To correct these inadequacies a new EIR must be prepared that fully analyzes the environmental impacts of this proposed project, includes suitable mitigation measures and proposes meaningful alternatives.

175-62

Respectfully,



Michèle Stone