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**ENVIRONMENTAL
UNIT**

23 December 2003

Los Angeles City Planning Department
Maya E. Zaitzevsky
200 North Spring Street
Los Angeles, California 90012

Reference: ENV-2002-2481-EIR
SCH#2002091018 Canyon Hills Project - DEIR Comments

Everyone in our community is talking about the incredible increase in volume and changing patterns of traffic that has occurred here over the past two years. A quick study of the referenced DEIR reveals what could be contributing to the problem. The intersection of Foothill and Tujunga Canyon Boulevards is listed as a heavily trafficked intersection near the Canyon Hills project and the just completed Tujunga Shopping Center (a related project). All vehicular movement studies and results were completed before the end of March 2003. In April 2003 two left-turn lanes were constructed at the northbound portion of Tujunga Canyon at Foothill. That same day another left-turn lane was constructed on northbound Tujunga Canyon just 200 feet south of the intersection - diverting traffic onto Shady Grove, a narrow one block long residential street. Thousands of vehicles now turn left here, the majority seeking to avoid the traffic signal. For many years Shady Grove had been protected by a no-left-turn designation for just this reason. Presently none of these left-turning vehicles are on any traffic study. The newly created access artery of Shady Grove is nowhere mentioned in the DEIR, which was published in October 2003. It is also missing from the Tujunga Shopping Center (related project) traffic study issued February 2003, even though the construction of the two northbound Tujunga Canyon left-turn lanes are documented. This glaring omission casts doubt on the thoroughness and validity of the entire traffic distribution reports. Such oversight should trigger a reissue of a corrected DEIR.

89-1

The DEIR also exposes a problem with the sewer planning. There is reference to 25 percent of the existing La Tuna Canyon wastewater disposal system capacity being open and available to the proposed project. This notation appears as a footnote referring to a telephone conversation. The importance of this issue should require that this assertion be substantiated by a written document and included in the DEIR. Aside from this, the DEIR claims that the 280 homes proposed by Canyon

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Hills would use only 15 percent of this remaining 25 percent capacity of the 15-inch La Tuna wastewater main. It is interesting that currently La Tuna Canyon itself contains less than 500 homes, half of which are likely still using private waste disposal systems, such as cesspools or septic tanks. This raises the question of the accuracy of this data. In view of the enormous expense that public wastewater disposal systems demand, a new DEIR should be issued which presents a more thorough representation of existing homeowner sewer use and facility conditions within the La Tuna Canyon.

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In order to meet the land use designations required to meet Los Angeles water use impact requirements, Canyon Hills is calculating the project's housing density using 280 dwelling units on 851 net acres (887 acres minus 36 acres of road improvements). Canyon Hills is employing this method in order to achieve the desired result of 0.33 dwelling units per net acre. This established the acreage as one integral project. The community has repeatedly asked Canyon Hills for assurance that preservation of 692 acres of open space will indeed be guaranteed. A reissued DEIR should contain specific written legal instructions on just how the 692 acres would be guaranteed preservation as open space.

89-3

Noise barriers bring up another problem with the referenced DEIR. Canyon Hills has planned for thousands of feet of non-continuous sound barriers from 8 feet to 16 feet in height. Even with this mitigation, dozens of the proposed homes would be within the 67dB noise contour of the freeway. At this noise level telephone usage is difficult. It can be described as standing in the kitchen with the garbage disposal running. A more serious problem exists in that all projected noise calculations are based on recorded noise data processed through a Caltrans noise prediction computer model LEQV2 using Sound32/Sound 2000. No corrective adjustments were made to allow for the transformation of acoustically absorptive natural terrain and flora into sound reflective surfaces such as roads, sidewalks, homes and hardscape. Even more importantly, there is a Caltrans Technical Advisory acknowledging that this computer model is only accurate to within 200 feet. Canyon Hills is using the computer model to project sound levels for distances up to 2000 feet. In addition, the LEQV2 computer model cannot account for atmospheric conditions or topography, particularly undulating terrain. The project site is a series of deep V-shaped canyons! In other words, at this time the LEQV2 computer model cannot accurately predict the noise levels to which the inhabitants of the proposed project would be exposed. Completion of the project, as designed, could result in two gated communities demanding more and more legally mandated sound walls due to excessive decibel levels. That would cost state taxpayers millions of dollars. A new DEIR is required which thoroughly incorporates and analyzes all noise parameters.

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Under California Senate Bill 1467 both the La Tuna Canyon Boulevard and the Foothill Freeway portions involved in the above referenced project qualify for California Scenic Highway status. The State has established guidelines of MINOR, MODERATE, and MAJOR intrusions which effect the continued qualification of these scenic highways. "Widely dispersed buildings", such as the 87 homes permitted by current zoning on the 887-acre project site, constitute a MINOR intrusion. "Dense and continuous development", such as the 280 homes on 194 acres proposed by Canyon Hills, constitutes a MAJOR intrusion. The designation "Grading blends with adjacent landforms" is a MINOR intrusion. "Extensive cut and fill. Canyons filled in", such as proposed by Canyon Hills constitutes another MAJOR intrusion. If these MODERATE and MAJOR infractions cannot be remedied, the State's scenic highway qualification will be revoked. Retention of these local highways as State qualified scenic highways warrants special attention. A new DEIR is required which specifically examines what steps will be taken to prevent irreversible damage to our local State scenic highway status.

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If a primary objective of the EIR is to protect public health and safety, the process should be revisited and a new, corrected DEIR generated. This opportunity to comment on the DEIR is very much appreciated by our community. Thank you for your attention.

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Respectfully submitted,

Maryellen Eitgroth

cc: Mayor James K. Hahn