

December 25, 2003

Darci Kahan  
9609 Hillhaven Avenue  
Tujunga, CA 91042

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

RE: EVN-2002-2481-EIR  
SCH #2002091018  
Canyon Hills Project -  
DEIR Comments

Dear Ms. Zaitzevsky:

This letter serves as a response to the objectives and proposed mitigation concerning the above-mentioned DEIR, which affects a large portion of beautiful canyons only a few blocks from my home. We moved to Tujunga after researching several surrounding communities, and learned that Tujunga was renowned for better air quality than adjacent areas, not to mention that it is very peaceful, not too bright at night, and a great place for one person to work from home. Especially after driving along La Tuna Canyon Road, we came to appreciate the rural character of our community as a rare and priceless gift, to be preserved and revered much like the author's of the Scenic Preservation Plan and Community Plans intended, who clearly understood that in order to properly protect the incredible natural landscape and wildlife of the area, there was a need for regulation of hillside development. These efforts are clearly aimed at the preservation of the low-density, rural character and the equestrian lifestyle.

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I have studied the DEIR, and while there are dozens of inaccuracies and omissions regarding the total environmental impacts I have identified as a "citizen expert", there are some key omissions in particular I want to target.

**AIR QUALITY:**

The DEIR states that construction emissions of NOx and PM10 will be significant, along with dust emissions with or without mitigation. It is further stated, "adherence to SCAQMD regulations, combined with distance from the source, would reduce PM10 emissions...". Specifically what is meant by "distance from the source"? Mitigation factors include wetting soil 15 minutes prior to movement, or as well, there could be applied a "chemical stabilizer to maintain a stabilized surface". The DEIR does not identify the chemical stabilizer nor addresses the

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effects of that chemical. The mitigation factors also suggest that moistening soil 15 minutes prior to soil movement is satisfactory, yet community residents adjacent to the construction activity who suffer greatly from allergic reactions and hundreds of basic allergies, must consider the cumulative impact the construction will have on air quality. Specifically, the consistent stream of emissions from large trucks entering and departing the project site (not to mention the amount of diesel fuel used by tractors at the site), the immense amount of dust emissions from constant grading activities, and other long-dormant allergens disrupted by equipment and the general restructuring of the landscape, will significantly impact the air quality.

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Residents adjacent to the project site will be required to consistently initiate measures for the exterior of their property to control the dust, however, most interior household duct systems do not filter-out, and cannot withstand, a great amount of allergens released into the air over a long period of time. Also, the DEIR states that "odors are not significant on a regional scale", not taking into consideration the region is prone to prolonged and excessive winds, which can cause great damage, and is a weather condition known to be much harsher in Sunland/Tujunga than in adjacent communities. I urge the City not to approve any zoning changes, which would allow a much greater area of development and thus disturbance of soil, and other factors contributing to potentially serious and ongoing allergic reactions.

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**TRAFFIC**

There are omissions in the Transportation/Traffic section of the DEIR, that I'd like to point out. Although the DEIR takes pains to average vehicle trips, and count vehicles and turns at nine intersections, they fail to discuss the potential effects of increased traffic on Tujunga Canyon Road, a dark, narrow, two-lane stretch of highway, that connects to Foothill Blvd., where the closest shopping is located. I feel the DEIR fails to consider that Tujunga Canyon Road is not a typically straight avenue, but in fact, is quite curved and dangerous, certainly not a street meant as a major highway, and one limited to improvements or expansion, due to the close proximity of residential and business properties on either side. The DEIR explains how the intersection of La Tuna Canyon Road at Tujunga Canyon Road has been improved however, the dark stretch of highway that is Tujunga Canyon Road between La Tuna and Foothill is prone to head-on collisions due to driver's missing the curves, over-corrections by drivers, and excessive speed. Additional information is needed on the impact of traffic for Tujunga Canyon Road.

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Also, Honolulu/Tujunga Canyon Road traveled from the Westerly direction (as in exiting from the I-210 West and continuing west), has three (3) lanes that merge into two (2) lanes after the intersection of Lowell Avenue. This merge occurs with the two (2) right-most lanes, which are the busiest lanes. This merge is difficult and surprising, with drivers frequently unaware, and again, this stretch of road has no

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room for improvement due to the nature of a narrow canyon road with development close on either side. Further, the right-most lane at this merge often has large trucks and delivery vehicles protruding into the area of the merge, thereby blocking a portion of the lane. Additionally, Honolulu/Tujunga Canyon merges again into one-lane heading North towards Foothill Blvd (after La Tuna Canyon). The DEIR estimates 2,694 net new daily trips during a 24-hour period, and many of these trips must be made to shopping centers on Foothill Blvd. via Tujunga Canyon Road. Potential residents of Canyon Hills requiring shopping, fuel and errands will certainly travel Tujunga Canyon Road, both from La Tuna Canyon Road and also from the I-210 West exiting from Lowell (instead of La Tuna Canyon Road), further impacting the difficulty of the above-mentioned merge, as well as adding to the risks frequently encountered on the two-lane, narrow strip of Tujunga Canyon Road. The DEIR states only ONE intersection will be significantly impacted (Development Area A/I-210 Westbound Ramps & La Tuna Canyon Road), yet Tujunga Canyon Road/Honolulu is the logical access to Foothill Blvd, a necessary route that serves as the closest link to basic shopping and services. We feel the DEIR needs to further address the impact of increased traffic upon Tujunga Canyon Road/Honolulu, both at the merge occurring near Lowell Avenue and also the stretch of road between La Tuna Canyon and Foothill Blvd.

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Also, concerning "Emergency Access" for Development Area A through either Verdugo Crestline Drive or Inspiration Way, another potential hazard exists in regard to increased traffic, however limited the intent. Both Verdugo Crestline and Inspiration Way must use Hillhaven Avenue for access to Foothill Blvd. Hillhaven Avenue, which cannot be widened due to the proximity of residential development on both sides, is another steep, narrow and curving roadway, susceptible to collisions due to excessive speed, driver overcorrection and flooding conditions. One such collision occurred recently in December 2003, resulting in an overturned car. Further, the DEIR states emergency access will be "closed for day-to-day use at all other times" (p IV.1-13), omitting information on whom will have the authorization to open and close said access. The potential for the "emergency access" to remain open at all times is a logical possibility, and given this possibility, potential residents of Canyon Hills would certainly find the "emergency access" route a much faster way to Foothill Blvd. (as opposed to reaching Foothill Blvd. via La Tuna Canyon and Tujunga Canyon Road), thus seriously compromising the impact of increased traffic and congestion on Hillhaven Avenue. Since Hillhaven Avenue is very narrow, there is also a problem with parked cars further constricting the street (from Alene to Foothill Blvd.), not allowing driver's enough room to pass each other safely (one car has to stop). Further, the DEIR states that Hillhaven Avenue "terminates at Alene drive (p IV.1-16) which is incorrect information. As a citizen of the neighborhood who frequently drives both Hillhaven Avenue and Tujunga Canyon Road, I attest to the fact that in one year alone I have experienced three serious near-collisions, two on Hillhaven and one on Tujunga Canyon Road, due to

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the particularly curved and narrow design, a design meant to handle limited traffic. The project's impacts are unavoidable and unmitigatable under the current proposal.

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**FLORA and FAUNA**

It appears there are several types of plants and trees that are listed as "a rare, natural community" and/or "sensitive vegetation types", which support special-status plant and animal species. These include Venturan Coastal Sage Scrub, which is the preferred habitat for the Coastal California Gnatcatcher, a bird federally listed as threatened.

And although the DEIR states that the Coastal California Gnatcatcher prefers gentler slopes than the existing (steep) terrain, and that no Gnatcatchers were in the area at the time of the survey, it also clearly states that there have been "recent observations" in parts of Los Angeles County, "including the western portion of the Verdugo Mountains", where it has been recorded (p IV.D-30). It appears the DEIR seeks to downplay the importance of the Coastal Sage Scrub and the Gnatcatcher; 1.85 acres (and more that is "thinned") is nevertheless considered "rare" and "threatened". The Venturan Coastal Sage Scrub is the natural habitat for many animals that rely upon it for survival, including sensitive, interrelated dependencies that make up the kind of ecosystems for which Tujunga is known. It is obvious the destruction of this ecosystem will irreparably affect a great portion of the area, most likely never to return.

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Further, the mixed Riparian Forest, Southern Coast Live Oak Riparian Forest and Southern Willow Scrub are listed as "rare natural communities", or in the case of the Southern Willow Scrub, subject to a "high level of threat", with significant impacts. The proposed mitigation measure of revegetation provides young plants that cannot sustain the mature habitat required for the existing ecosystem, therefore revegetation is ineffective. The DEIR admits that new trees will take 10-20 years to be fully effective for their habitat, with many years for other types of flora as well. Again, an attempt is made to downplay the impact; the DEIR authors seem to think that trees which are less visible, are somehow less valuable, not taking into consideration their crucial roles in sustaining their habitats. And since the "impact on Coast Live Oaks would remain significant" (p IV.D-124), perhaps an alternative would be to preserve the Oaks, and plant new growth as well.

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Further, Los Angeles has experienced years of short rainfall seasons and drought. The DEIR states that endangered plant species, such as the Plummer's Mariposa Lily, Braunton's Milkvetch, Nevin's Barberry, Santa Susana Tarplant, San Gabriel Mountains Dudleya, Many Stemmed Dudleya, Roninson's Pepper Grass, Davidson's Bushmallow or Slender Horned Spineflower were not found in the study

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area in 2002. The years 2001 and 2002 were not high rainfall seasons; after a normal amount of rain, these native plant species will return. The rare, threatened or endangered Slender Mariposa Lily, however, WAS observed in the study area, as well as the Ocellated Humboldt Lily, which is listed as special-status. Canyon Hills is a naturally occurring habitat for these delicate plant species, therefore, special attention should be given when considering the destruction of their fundamental environment. To simply relegate the amount of property affected as limited, to imply that certain dried-up plants mean a species is struggling for survival, or to minimize impact by stating a special-status plant is common, undermines not only the damaging cumulative effects upon a delicate environment, but also undermines the Community Plan and the Scenic Preservation Plan for this area.

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The DEIR also discusses the removal of 232 of the estimated 1,247 Coast Live Oak trees, which are protected and require a permit (does this 232 include the twenty (20) trees that will be impacted by the bridge crossings?). The Coast Live Oaks are both a valuable habitat and aesthetic resource, providing an integral link to the ecosystem for numerous bird and animal species, regardless of location, health or visibility. To assume that protected, valuable trees, which can live 200 to 250 years, have minimal impact because of their location, or to state that replacing removed trees with extra saplings is more than sufficient, is arrogant and disrespectful of the protective ordinance. Perhaps that is why the DEIR ultimately acknowledges the impacts to be significant.

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If the DEIR makes statements like "these facts represent evidence of an initial effort at mitigating project impacts through the minimization and avoidance of impacts to oak trees and native plant communities" (p I-21), and that "entire habitats" of the "lost community" (p I-23) will be replaced, then why request zoning variances for a much larger, much more destructive development? Why not SHOW the respect by building/grading the amount of homes/sites currently allowed by zoning laws?

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Further, how can the community trust a project arborist and the project engineer, both on the Canyon Hills payroll, to make and implement appropriate mitigation measures or protections, when it is simply easier to remove the problem (before anyone notices)?

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**BIRDS/WILDLIFE MOVEMENT**

There are several species of birds and wildlife listed as "special concern" or "threatened", all indigenous to the area. The DEIR however, does not find many of these species at the project site, or as "not common in the study area", some conclusions that were drawn from a survey duration of about a month in 2002, or from an old report dated from 1930-1968. The DEIR is deficient in proving these species do not use the project site, especially since residents see them regularly.

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As mentioned above, the Verdugo Mountains serve, and continue to serve, what is considered a delicate ecosystem, contributing greatly to the ongoing and important lifecycle of plants, reptiles, birds and animals. Both the Ashy Rufous-Crowned Sparrow and the Cooper's Hawk thrive in the area, and there is no doubt that long-used habitat currently in use will be lost. The author's of the DEIR seem to feel that the large amount of open-space to be preserved is the key mitigating factor, despite the devastating effects of massive grading to hundreds of acres, noise pollution and the possibility of construction during nesting season. It is hard to imagine a biologist flagging an active bird's nest as effective mitigation, when completely surrounded by the constant disturbance of development anywhere from 25 to 200 feet away, for miles in any direction. An interruption this violent will most likely not save the active nest(s), and it is equally unimaginable that construction would cease based on the findings of a single threatened or even endangered species, or that a threatened nest would be "protected until nesting activity has ended" (p IV.D-60). Logically, the proposed development will significantly disrupt the bird population, including the California Gnatcatcher (which has been identified in the Verdugo Mountains), the Orange Throated Whiptail, the Yellow-Breasted Chat, the Yellow Warbler, the Cooper's Hawk, the Coastal Range California Newt, and several types of lizard, rabbit, and frog.

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Although the "missing link" theory may be valid to an extent, as development in the mountains has already seriously encroached upon wildlife, the DEIR admits there are animals that regularly traverse the greater areas (i.e. the San Gabriel Mountains) into the Verdugo Mountains, such as coyote and gray fox, which have adapted to the "wildland/urban interface". Therefore, it is fair to say the "missing link" is not a complete barrier, as animals continue to find their way in and out of the Verdugo Mountains, including the project site. Rather, it is more likely these animals have somewhat adapted to the obstacles caused by urban development, despite the fact that the Wildlife Corridors continue to be threatened, and should be more earnestly protected from further encroachment. Further, it is absurd for a citizen expert of the area to read that local wildlife movement North of the I-210 is limited due to fencing and development, and "which accounts for the general lack of sign (sic) on the north side of I-210" (p IV.D-146). This information is incorrect; the local Canyon Hills area includes almost 900 acres, the DEIR states that animals regularly traverse the local corridors (such as coyote, mule deer and gray fox), and any hiker traversing the area can hear and observe the wildlife at any time of day or night. As well, residents near areas of wildland in Sunland/Tujunga, and especially near the project site, know a large coyote population thrives and continues to grow here, from evidence based upon daily sightings, problems encountered and of course, the frequent and resounding chorus. Yet the DEIR states "...it is expected that up to five coyotes would use the project site and Duke property at any given

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time" (p IV.D-141). Perhaps the coyote population should be re-evaluated, as it may have changed considerably since April of 2002.

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From years of personal observation, it is obvious that the wildlife has adapted to the mixed chaparral terrain by creating an extensive myriad of narrow, almost undetectable trails throughout the underbrush, allowing them to easily and freely traverse the dense chaparral with the safety of cover. Yet the DEIR states that coyote movement is "occurring almost entirely on existing trails, ridgelines and fire roads" (p IV.D-150). This statement is directly refuted by the evidence of the terrain. In particular, the mixed chaparral in the area of Verdugo Crestline Drive and the SCE Transmission Line Row clearly indicate extensive wildlife movement in the underbrush, taking full advantage of the dense vegetation. Yet, the DEIR states "steep topographic and dense vegetation characterize the existing conditions along the SCE Transmission Line Row and, as such, local wildlife movement is limited or essentially non-existent" (footnote #33 on p IV.D-155). The DEIR then goes on to say that Bobcats could use the SCE Transmission Line Row for movement, and, like the Bobcat, the Gray Fox exhibits some potential for using the dense chaparral within the SCE transmission Line right-of-way for local movement in the existing condition..." (p IV.D-159). It also states that Bobcats, although not detected by the study, have "appropriate habitat" and it is fully expected that Bobcats cross Verdugo Crestline Drive..." (p IV.D-150). The DEIR acknowledges the SCE transmission area in the northern part of Development Area A as an East-West movement corridor, "however, due to the dense chaparral & steep topography, this feature does not represent an existing corridor or link through this portion of the project site" (p IV.D-131). They go on to explain that animals moving from the San Gabriel Mountains through the "missing link" area and into the Verdugo Mountains don't necessarily travel through the project site, but move Westerly (p IV.D-131). In fact, animals travel Eastward, Southward and Southeast, right through the project site. Further, p IV.D-135 says, "initial surveys on the North side of the I-210 detected no sign of wildlife movement" (not even coyotes), when later, the DEIR found considerable wildlife. These statements appear inconsistent, if not contradictory, and it appears the author's of the DEIR know their proposed development for Area A will seriously affect wildlife movement and patterns, as well as the Verdugo Crestline Drive Corridor. The DEIR also states "In accordance with Appendix G to the CEQA Guidelines, a project may have a significant impact on the environment if it would...interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors..." (p IV.D-49).

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The fact is Verdugo Crestline Drive is an existing fire road which runs closely parallel to the SCE Transmission Line Row for many miles, and certainly acts as a major local and regional movement Corridor for East-West movement. Other fire roads exist near the SCE Transmission Line Row, and due to the simple access of

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this terrain, not only is extensive wildlife movement clearly evident, and not only is it a major Corridor for movement East, West and South, this terrain also enables the animals to move along fire roads or through the underbrush. The proposal for Development Area A is located at this essential Corridor, which will impede wildlife by blocking wildlife movement to the East, West and South. The proposal for Development Area A should be amended, and not be allowed to restrict this crucial wildlife Corridor, and use of either Inspiration Way or Verdugo Crestline Drive for "emergency access", yet another significant impact, should not be granted. Additionally, it is difficult to imagine even low-level lighting in this area. The DEIR does not adequately mitigate the impact of lighting on the wildlife.

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In summary, I agree with the DEIR that potential loss of wildlife, habitat, ground-nesting sites and aquatic resources are great. And also with regard to "indirect impacts: "For many development projects constructed adjacent to areas of native habitat, indirect impacts are often associated with various phases of the development project, beginning at the time of initial grading and construction, and possibly continuing INDEFINITELY. These impacts may occur as a single event, or can interact cumulatively to adversely affect native wildlife, plants, and their habitats" (p IV.D-60).

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**NOISE**

The DEIR states the possibility of blasting, as well as the use of a "rock-crusher" and loader (p IV.1-11). This appears a significant problem to the equestrians in the area, who have horses adjacent to the project site. The DEIR needs to provide more information on specifically when and where this type of activity could occur.

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Further, constant construction noise from 7am to 9pm, is too disruptive. That's 11 hours of noise, SIX days a week. And limiting the hours on Saturday from 8am to 6pm within 500' of residences does not satisfactory mitigate the cumulative effect. The constant noise from large trucks, tractors, machinery, digging, deliveries, workers, basic grading, blasting and other hydraulic/electric equipment will severely affect residents, domestic animals and wildlife. I agree with the DEIR that "due to the quiet ambient conditions in these residential areas, the mitigation measures are UNLIKELY to reduce construction noise to a level of insignificance..." (p IV-29). Approval of this project must include reasonable hours for controlling the noise pollution, as well as the details, and residential notice, for any blasting or rock-crushing activities.

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**ALTERNATIVES/APPROVALS**

There is no justification to allow for a General Plan Amendment and Zone changes, which would be required to increase the allowed 87 homes on the project site to 280 homes. The larger development would irreparably harm the Verdugo Mountains, as approval of this project would irrevocably alter the protective and restrictive nature of the Sunland/Tujunga Community Plan, which directs "efforts aimed at

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preservation of the low density, rural character and of the equestrian lifestyle", and to "encourage the retention of passive and visual open space which provides a balance to the urban development of the Community".

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Thank you for the opportunity to comment.

Sincerely,

*Darci Kahan*  
Darci Kahan