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Los Angeles City Planning Dept.  
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200 North Spring Street  
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**RECEIVED**  
CITY OF LOS ANGELES  
**DEC 29 2003**  
ENVIRONMENTAL  
UNIT

RE: ENV-2002-2481-EIR; SCH#2002091018  
Canyon Hills Project – DEIR Comments

Dear Ms. Zaitzevsky:

I am a resident of Tujunga and my home is adjacent to the Canyon Hills Project Area. I am a Computer Scientist and have a BS degree in Biology with a Zoology Emphasis. I have reviewed the DEIR and have found that the information in that report has many flagrant inaccuracies and omissions. The DEIR fails to address the Environmental Impacts that the project will have.

121-1

The entire project needs to be re-engineered using current city building codes, and in accordance with the Community Plan and the Scenic Preservation Specific Plan. This means for starters that the entire project must be scaled down to no more than 87 homes, and probably somewhat less than that based on the slope density formula.

121-2

In this response to the DEIR, I will identify areas that are in Error. There just isn't enough time to comment on the entire report. Every single page of the report that I start to read, I have some conflict with, and since the report is quite huge, it would take a team of reviewers to do a thorough analysis. This report is very difficult to filter out the essential components that paint the big picture. There are pages upon pages of fluff that make everything sound beautiful, then 1 key sentence that is buried, and you are not likely to understand the full impact of that 1 key sentence since you are overwhelmed with beautification talk. You really have to know how to read between the lines. This report writing practice makes it very difficult to know what is really going on with this project.

121-3

**Section III PROJECT DESCRIPTION**

In figure III-1

The entrance to the Duke Development has a dead end road.  
The use of this road is not specified in detail.  
There is reference to this as being a possible "main road" to the complex.  
But the map does not detail where the road is going or what it is used for.  
There is some secret intent for this access to the project site.

121-4

**Section IV. A. GEOLOGY AND SOILS**

**Appendix D Section 1**

Geotechnical evaluation

**7.1 Topography**

*(Quote)*

*The project site is steep, hilly terrain with distinctive ridgelines dropping sharply into deep "V" shaped canyons. These "V" shaped canyons are abundant throughout the canyons. Also they reference many scenic ridgelines.*

Note: there is a Scenic Preservation Specific Plan.

They plan to grade up to 100ft vertical relief of the scenic ridgelines.

This is not acceptable.

They also plan to build houses that can tower 35ft above the scenic ridgelines.

This is not acceptable. I will discuss this point more in another section.

121-5

They plan to grade the scenic ridges and create in **their own words** :

*(Quote)*

*"The majority of cut slopes will cause slope failures requiring stabilizing measures.*

*Slope instability could lead to slope failures that would propose a hazard to property and life safety."*

Following their mitigation measures, they do not consider their grading and filling a significant impact to the project site stability. They use the term significant(ly) a lot. Everywhere I see the term significant(ly), I see a really bad picture of the feature in question.

**Appendix D Section 2**

They are planning to do Blasting which would significantly affect noise, air quality, and vibration. Not to mention what affect it will have on any wildlife that is left. And once again they say this will not have any significant impact.

121-6

The community will not tolerate this.

The community is a peaceful and quiet place to live and the air quality is the best air in the entire Greater Los Angeles area. Their proposed plans will totally change the characteristics of the community forever. How can they say that there will be no significant impact?

**Appendix D Section 13**

**4.3 Import**

In this section they discuss bringing in foreign dirt required for grading.

This will introduce alien species that cause a secondary succession to over take the native species. The foreign land fill can be brought on site without quarantine. This will further destroy the environment. The 48 hours they talk about, for lab work to be performed, before bringing foreign land fill on site is a play on words. It doesn't take 48 hours to get routine lab

121-7

work performed. The foreign land fill should be quarantined totally and completely until the results are reviewed by qualified independent Botanists and signed off on.

121-7

**7.0 Excavation**

In this section, if you read in between the lines, they talk about during the grading process, they can

(Quote)

*Further excavation or overexcavation and refilling of cut areas shall be performed.*

Which means that they can basically over excavate to their own desire.

Bad planning on their part, only means a lot of over excavating.

121-8

**Appendix D Section 14**

**Duke entry alternative plan**

This is the last section in appendix D.

This plan was conveniently buried at the end where most people won't even read it.

**The proposed alternative plan is out of bounds of the development site.**

Who owns the land?

Why wasn't it included in the overall plan scope? The writing is on the wall.

This is a big secret "alternate" entrance that the entire development is dependent on.

121-9

**In 3.0 Proposed Development,**

**There is no mention of the Duke Entry Alternative Plan.**

There is mention of the Verdugo Crestline Road or Inspiration Way Emergency Access.

This means that the proposed plan cannot support Emergencies.

Emergency Services have to be incorporated into the primary plan.

**The primary site entrance is inadequate** and will be discussed in a separate section.

Their way to address the main entrance short comings is to have

Secretly kept alternative entrance plans that will solve all the problems.

When the Main entrance fails to adequately support the needs of the project,

On other maps, the short road to the Duke property is a Cul De Sac, and I was asking myself, what is the true purpose of this. There has to be a hidden secret agenda for this Cul De Sac.

121-10

The reason this is here is because they plan to use this in the development as soon as the short comings of the main entrance are recognized.

There was a reason why they couldn't include it in the formal plans in the first place.

**Section IV. B. AIR QUALITY**

**Appendix E**

**Air Quality Report**

(QUOTE)

*The need for and amount of blasting required is uncertain.*

They don't have accurate information about the amount of blasting needed.

I didn't see any accurate statistics about how much air pollution will be generated by the blasting.

(QUOTE)

*The project would not have a significant cumulative adverse impact on local air quality.*

There are 22 pages of charts and figures and mitigation measures to come to the conclusion that there will be no significant impact on air quality. This community has the best air quality in the greater Los Angeles area, and they will destroy it.

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121-12

**Section IV. D. BIOLOGICAL RESOURCES**

**1. FAUNA**

On page 16 of 66:

*(Quote)*

*A detailed discussion of wildlife movement is discussed in section Section IV. D. 3. Wildlife Movement*

When I reviewed that section of wildlife movement, Birds and small mammals are NOT addressed by the study at all. The following statements are from Section IV. D. 3:

*(Quote)*

*All resident and migratory avifauna (birds) can simply go somewhere else, And therefore the birds will not be addressed in this study.*

*(Quote)*

*The proposed project would not change the existing conditions relative to dispersal/movement of small mammals and reptiles.*

121-13

**Corrective action needed:**

There was no study of these movements.

The movements of Birds and Small Mammals need to be scientifically studied in detail.

The planned development would be a barrier that would prevent or hinder the free movement of small mammals and some birds to and from the adjacent areas.

Have you ever seen a road runner fly?

I have.

If a road runner attempted to cross the 210 freeway, it would likely become road kill.

**Appendix G**

**Section IX Bio.PDF**

On P. 60 of 69

**Section 7.5 Minimum Replacement Standards**

I am very disturbed by what this section has to offer to the community.

This section is attempting to justify the removal of Mature Oak Trees, but that they do not need to follow the city ordinance of replacing the trees, because they are a "Large Property". In other words, since they are destroying such a large amount of Oak Trees and other trees, it should not be necessary to replace them.

This section says very clearly that they intend to destroy the trees by grading, And are not planning to follow city ordinance to replace them.

If you read between the lines,

They are planning to first grade and totally destroy a very large swath of Mature Trees.

They only plan to replace the 15 gallon trees and boxes very minimally only along the road sides, Common areas, and entry way.

They state that it is only significant to replace the Oaks, where people will easily see them.

The environment doesn't care about what people see from the road.

The Oaks and other trees are part of the environment, and cannot be removed because they are not in the line of site of people driving along in their cars.

121-14

In all other areas of total destruction,

They plan to replace with some 1 and 5 gallon trees (over time meaning many years?),

But only if they are in a direct line of site.

If you close your eyes then you don't need to replace any trees?

They are also planning to "Enhance the Habitat" by planting Acorn seeds. That is worded such that it sounds like they are doing a favor by removing Mature Trees, And improving the habitat by replacing them with Acorns.

121-14

The planned replacement of trees is not acceptable by any stretch of the imagination.

**I have some general comments about the Wildlife and how the project will affect them:**

I don't think there was enough time observing the species. That would explain why they failed to observe many species that exist on the property. 4 days of tracking is not sufficient sampling time. Also it appears that their sampling stations were right next to the freeway. Location has a lot to do with population studies.

121-15

The grading and removal of natural cover, will expose many critters to predation.

121-16

There is no mention of the study of insects.

In other words, there were no scientific methods used in classifying and counting insects. They are part of the ecosystem.

121-17

By grading, you will remove insects, the bird population that feed on the insects will decline. And so on.

The Coyotes I see almost every day. The studies did not accurately count the Coyote population. The studies did seem to accurately count the road killed Coyotes, and there will be a lot more dead Coyotes when they are displaced by the planned project site. They daily navigate the planned project site which will become a barrier for their movements. I expect that the Coyotes will be perceived as a threat to some of the new tenants. The new tenants may even try to poison the Coyotes.

121-18

I frequently hike the project site north of the 210 freeway.

I have observed a Long Eared Owl at night and early in the morning.

The Owl stays away from well lit areas at night. The increased lighting produced by the project would have a direct impact on the owl behavior.

I have observed the Owl on my early morning walk along Verdugo Crestline.

The owl is disturbed by my presence at ¼ mile away and fly's away. This is a very delicate balance between the Owl and the land.

121-19

I often see large groups of California Quail. You will be walking along, then all of a sudden out of the brush out comes a bunch of 15 or so Quail. Removal of the brush will have direct impact on bird nesting and population.

121-20

**Section IV. E. NOISE**

*(QUOTE)*

*The estimated blasting sound levels are expected to be well below these published Maximum Allowable Exposure Limits.*

Does that mean that I will not have permanent hearing damage?

What if I have a heart condition,

My neighbor Amir Sharmad told me that his wife Angela has a heart condition and that loud noises affect her condition. That means that people with a similar heart condition may need to sell their house and relocate.

121-21

This section did not describe the impact of noise on Wildlife. Animals cannot co-exist with this magnitude of development. Wildlife will be stressed out and will move out.

There will be an increase in road kill on the 210 freeway.

As well as an increase in traffic accidents on the 210 freeway.

There will be loss of life due to traffic accidents caused by vehicles swerving to avoid an animal trying to escape the construction noise.

121-22

Most pets will not adjust to blasting and other noise created from the blast site.

How many people in the surrounding community have pets that will be adversely affected by construction noise? That is just about every single person in the community.

121-23

121-24

**Section IV. F. ARTIFICIAL LIGHT AND GLARE**

**Appendix F**

**Artificial Light and Glare**

Photo 5 in Figure IV F-4

Typical Southwesterly View from Tranquil Drive toward Interstate 210.

This is incorrect.

Should be

Typical southwesterly View from Reverie Road toward Interstate 210.

121-25

This plan has not sufficient knowledge of the adjacent community.

Note that all of the houses are facing towards the Scenic Ridge line and not the Freeway.

You cannot actually see or hear the Freeway from inside of one of these houses.

**IV G Land Use**

**Table IV.G-4**

**P. 16 Community Plans**

I urge the City Council that they do not allow the development to change the Land use designation as stated in this section. They should only be allowed to build within the current zoning laws and in accordance with the Scenic Preservation Specific Plan.

121-26

**1-3.1**

The Project is not consistent with Community Plan Policies. The Neighborhood Character and Identity will be totally destroyed. There will be significant Impacts on Services, Public Facilities, Traffic Levels, and Environmental Impacts.

121-27

**1-3.3**

Most of the existing views of hillsides and mountainous areas would be affected. Not only would their views be affected, but they would be looking at total destruction of the environment for Years and Years to come. The proposed development would not conform to the Scenic Specific Plan as is stated here.

121-28

**1-6.3**

The proposed grading would totally destroy the environment. I have discussed this to some degree in other sections. They are not doing minimal grading. They are doing the most damage by grading possible.

121-29

**1-8.1**

They are building a gated community. How does this preserve the equestrian oriented neighborhood? The proposed equestrian park and facilities is not adequate to address this issue.

121-30

**5-1.5**

The Foothill (210) freeway and La Tuna Canyon Road are designated as scenic highways. These are designated as scenic corridors. This project is going to look like a disaster area from these highways.

121-31

**13-2.1**

These statements made here just are not real. I have commented about the impact that the project will have on traffic.

121-32

**14-1.1**

Anybody attempting to leave the gated community to access La Tuna Canyon by bicycle, would be in danger of being hit by traffic. The traffic here is very fast. It is right next to several freeway exits and a freeway entrances.

121-33

**14-2.3**

(QUOTE)

*Neither development area is appropriate for horsekeeping due to the steep topography. I have seen horses kept in some pretty steep and hilly areas. If the land is deemed too steep for horses, how can we justify to change the zoning to accommodate 280 houses?*

121-34

The Scenic Preservation Specific Plan is intended to preserve, protect, and enhance the unique natural and cultural resources of the Plan area.

121-35

The Foothill (210) freeway and La Tuna Canyon Road are designated as scenic highways. This project is going to look like a disaster area from these highways.

**IV H Population and Housing**

I cannot imagine that these 280 luxury built homes are going to only have 2.97 persons per house. I believe the number will be much higher. This is going to be a gated, large capacity dwellings. We are going to see large families, and multiple families, which will stretch the infrastructure of the community. It is common to see multiple families living in a large house. My neighbor has a large house and there are 3 families living there. There are 9 people living in that house, and it is not even half the size of the proposed luxury houses. The 2.97 persons per house statistic should not be used to gage population estimates or the impact they will have. In some cultures it is common for many families of relatives to live together in the same house.

121-36

**IV I Transportation/Traffic**

In addition to the large families that will probably live in these luxury homes. There are other factors that contribute to Traffic problems:

**Construction Equipment that contribute to traffic:**

Since Area A & B is an outside in approach, all of the initial staging will occur on La Tuna Canyon Blvd. Area B which is immediately adjacent to the 210 freeway. Traffic that will exit west bound at La Tuna canyon will be right to the center of the staging area for Area B. This construction will cause gridlock for all traffic attempting to travel from Sun Valley/Burbank area to the Foothill community via La Tuna Road.

121-37

**(QUOTE)**

*There would be no trips generated by trucks hauling dirt to and from the project site.*

This is a grossly inaccurate statement.

The grading is considered a balanced site. They grade and fill, re-using the existing dirt that has been "cleaned" to remove rocks and bolders. The rocks and bolders are not re-used to fill. Rocks and Bolders probably make up a very large percentage of the graded material. This material will likely be hauled off site. There will be a long line of dump trucks hauling to and from the construction sites.

121-38

**In Appendix D section 13 – 4.3 import**

They discuss the import of foreign dirt (they plan to bring in foreign dirt in that section). Note that the import of foreign dirt will introduce alien species and secondary succession of unwanted species. Also will increase traffic to and from the project site.

121-39

**On Page 13 of 46.**

**(Quote)**

**Emergency access.**

*The purpose of emergency access is to permit adequate vehicular access to the project site by emergency vehicles (eg., police, fire, ambulance), as well as to allow the evacuation of the project site by residents in case of emergency (eg., fire, earthquake, landslide, etc.).*

121-40

Example of Verdugo Crestline or Inspiration Way.



So what this is saying that they plan to open the flood gates in an emergency to let all of the 1000 cars evacuate the emergency access at the same time that the emergency vehicles are trying to enter the community. This is not acceptable for obvious safety reasons.

The emergency access should only be planned for Emergency Access.  
This does not mean that the Emergency Access part of the plan is acceptable.  
It is not.

The roads are narrow and twisting and turning.  
The roads are also OUR (the adjacent community) only evacuation routes,  
Which means that any the emergency vehicles would have road blocks to their planned  
Emergency Access to the new development.

121-40

This kind of general statement regarding access and evacuation from the project, opens the door to general access to and from the project site by the residents. This means that eventually, most of the traffic to and from the new project will be through these corridors.

The Verdugo Crestline is currently a park and hike location.  
This would further impare access. 28 feet minimum is required for this plan.  
Some of the areas along the planned Emergency Access are not currently 28 feet.  
To implement the plan would mean that current residents would be denied parking.

**Service Providers that contribute to additional traffic:**

- Utilities of all types: Electric, Gas, Cable, Water & Power, Garbage pickup.
- Landscaping and Gardening.
- Pool Maintenance.
- House Maintenance: Handy Man, Plummer, Electrician, Painters, etc...
- Home Improvements like Concrete patio additions.
- Maids and Butlers.
- Baby Sitters.
- Tutors, Special Education, and Private Lessons.
- Deliveries of Furniture, Appliances.
- Pizza, Food, and Grocery delivery.
- Home Buisness.

121-41

There is the traffic that is generated by the lookie loos that want to see first hand the total destruction of the environment that is generated by the new development. They will use the existing community access to try to find a place to park their car. This will cause a Fire Hazard as they will be parking in No Parking areas that must be kept clear for the Fire Engines and other Emergency Vehicles. Even if they do not park their car and get out, the additional flow of traffic will cause hazardous conditions. These adjacent areas cannot handle the traffic created either directly or indirectly by the development.

If the Development was to proceed as planned, people goods and services would attempt to gain access to the gated community by traveling through the adjacent communities. As I just stated, the adjacent community cannot handle any increased flow of traffic that this would create.

In figure IV.I-4

There is no mention that the Duke property is being planned as an emergency entrance. They are concealing the hidden intent that the property will be used as an emergency access. A few words about the planned secondary emergency access. Once they are in place, they would become

121-42

primary main entrances to the complex (the writing is on the wall). The primary entrances cannot handle the traffic.

121-42

**Impact construction will have on the 210 freeway.**

I am a resident expert.

The 210 freeway west in the morning commute is traveling at up to 80 miles per hour. Some cars go faster, some slower. This is also a road heavily traveled by 18 wheelers. Now picture a displaced animal attempting to cross the 210 freeway to escape from the development. Cars are going to swerve to avoid hitting the animals. Multicar pile ups are going to occur very frequently involving 18 wheel trucks. This will likely result in not only property damage, but loss of life. What once used to be a great commute on the West 210 in the morning commute, will now be a disaster area.

121-43

There will be a debris field created by dump trucks that and other construction traffic that are leaving the project and entering the freeway. Also any cars driving by the project will pick up debris and deposit on the freeway. Debris on the freeway will cause a huge amount of damage. Cracked windshields, chipped paint, broken headlights, etc...

Also dump trucks that and other construction traffic that are leaving the project and entering the freeway will likely be dropping rocks on the freeway.

*(QUOTE)*

*The proposed mitigation to install a traffic signal at that intersection will reduce the cumulative impact to a less than significant level. Therefore, no significant cumulative impacts will occur. Correct me if I am wrong.*

They are saying that by installing a single traffic signal at one of the construction site entrances, that single act will reduce all traffic issues to less than significant.

Here again we have 46 pages of facts and figures, more than enough to get lost in, and then at the very end, the mitigation measure that doesn't amount to much.

121-44

**Quality of the maps on the Canyon Hills Figures Page:**

The maps are poor quality and many are not legible.

The detail in the maps are required to make intelligent decisions about the plan.

The legend text and graphical icons are often totally unreadable.

The map detail is often totally unreadable.

The map detail often looks like a giant grouping of indistinguishable blobs of ink.

After trying to find a detail in these maps,

It becomes futile and I want to just give up.

121-45

Human nature will accept unreadable maps as if they are depicting the truth.

I do not accept these maps or anything that they are trying to detail to the public.

**Corrective action needed:**

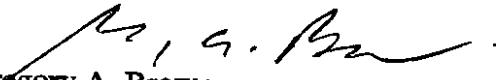
We need better quality maps.

Rework all of the graphics that are not legible into a more readable format.

In closing, I would like to request that the City will require that the Canyon Hills Project re-issue the DEIR to address the Errors that are stated within my report. I also request that the Project Plan stays within the Community Plan, current Zoning laws, and the Scenic Preservation Specific Plan.

121-46

Sincerely,

  
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