

**LG Swan
8764 Apperson Street
Sunland CA 91040**

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CITY OF LOS ANGELES**

DEC 31 2003

**CITY PLANNING DEPT.
ZONING ADMINISTRATION**

**Maya Zaitzevsky
Environmental Review Unit
200 North Spring Street Room 763
Los Angeles CA 90012**

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

December 28, 2003

Environmental Review Unit
Maya Zaitzevsky
200 North Spring Street Room 763
Los Angeles CA 90012

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

Dear Ms Zaitzevsky:

I appreciate this opportunity to comment on the referenced DEIR. I have lived at this Sunland address, which is within 500 feet of the proposed project boundaries, for five years. The rural atmosphere is the reason I've stayed here.

In my review of the DEIR, I noted several areas worth submitting comments on. I am briefly listing these areas here, to be followed by my detailed comments.

135-1

Environmental Setting Section II C, Related Projects
Duke Property (frequently mentioned throughout the DEIR)
Environmental Setting Section (generally, in it's entirety)
Archaeology Section IV.O.2 and Appendix L
Biological Resources Section IV.D.1 Flora and Fauna
Environmental Setting Section II B, Overview page II-5

I first noted the Related Projects in the Environmental Setting Section II C. Figure II-2 shows locations of identified related projects. Table II-3 lists the identified related projects as shown on Figure II-2. I know of five related projects not identified. Although small and of infill nature, these five projects are just as 'related' as the thirteen identified in the report.

135-2

All of these unidentified projects are at the west end of Apperson Street and on Hidden Oak Drive, north and south of Apperson Street in Sunland where I live. One developer has built five rather large homes on five rather small lots (two projects). Another developer has built two rather large homes on five small lots (two projects) and is planning to build a third home on two very small lots combined with the proposed street vacation area (one project).

The property adjacent to the street vacation area is over a blue line stream. This property and the street vacation property (vacation stream property) have been graded 'flat' since October, 2003 in preparation for new construction. Actual construction will commence at the end of five years' street vacation application process. In my humble opinion, actual construction on the vacation stream property will further the 'tenuous' in the tenuous existence of Missing Link #27.

135-3

Wildlife has historically used this property for a multitude of wildlife community services. Food, water (the blue line stream) and access to wildlife paths/corridors connecting to and from the Verdugos, the Angeles National Forest and Missing Link #27 are three examples of the services sought here. The seekers include gray fox, quail, red tail hawk, peregrine falcon, owl, silvery legless lizard, rattlesnake, desert slender salamander, coyote, rabbit and many others. When the bulldozers arrived about three years ago, the wildlife activity deviated from the observed 'norm' in that fewer sightings of fewer species have been noted in these three years. Winter wildlife movement has resumed somewhat, though it is now diverted through our property and through a few other properties to the west of the 'vacation stream' property.

135-3

In my humble opinion, the foregoing exhibits major deficiencies in the DEIR.

Restrictions on wildlife movement and degradation of available wildlife community services are two cumulative impact areas that must be reassessed using revised impacts data. Traffic, air quality, population and public community services are also areas of impact that should be reassessed using revised impacts data that includes these 'unidentified' projects data and many other projects within this area. One specific data factor I would like to point out is a vehicle count. Associated with these five 'unidentified' related projects, I have noted a resident vehicle count of twenty-one (21).

135-4

The 'Duke Property' is frequently referenced throughout the DEIR. It is also identified as a Related Project. I'm not understanding the relationship between the project developers and the Duke Property. If the Duke Property is on the open market for sale, how can one (person or entity) maintain any claim of any rights? Moreover, how can results compiled using the Duke Property data as if it were an integral and undeniable actual property in the developer's possession be valid? This presents more discrepancy with the DEIR.

135-5

Many serious cumulative impacts of the proposed Canyon Hills project have been either summarily dismissed, downplayed in their significance, or based upon figures in obvious conflict with other figures used in the DEIR, e.g., in the Archaeology Section IV.O.2, and the related Appendix L. The *Investigation Methodology and Results, Onsite Investigation* paragraph of Section IV.O.2, The archaeologist states that only 50 acres were accessible to the investigators. Therefore, only 50 acres were examined. In the Archaeological Appendix L, the archaeologist discusses the on site walkover: "Because of the lack of a previous survey over the entire 600 acres of the property, it became prudent to conduct a walk over survey of the proposed parcel..." Here (Appendix L, Page 8), less than 50 acres of the project site was cited as accessible.

135-6

Going with the 887-acre site size estimate, if the bulk (837 of 887) of the project site were inaccessible to (unexamined by) the archaeologists, could not the other onsite reviewers have been similarly restricted? Extensive preparatory 'literature review' notwithstanding, would not such restrictions provide incomplete or insufficient data? This presents another deficiency in the DEIR.

The Biological Resources Section IV D.1 Flora and Fauna with its related appendices is a very

135-7

large subject for review. I did, however note the following for review.

A disturbingly large number of both flora and fauna species were 'dismissed' throughout the Biological Resources Section by the verbiage: "...However, it was not detected in the Study Area during the surveys and is not expected to occur based on lack of detection." This seems to me to be circular logic and deceptive. Biological surveys were not conducted across all seasonal occurrences of all species as set forth in the California Department of Fish and Game Guidelines document (dated 12.9.1983, rev. 5.8.2000). Conclusions, summaries and results compiled from such data are questionable, calling into question all of the DEIR analyzed impacts. This represents another deficiency in the DEIR.

135-7

Finally, I note that the proposed development areas and the entire 'Study Area' are entirely within what Los Angeles County has designated as 'Los Angeles Verdugo Mountains Significant Ecological Area (SEA) 40,' as stated in the DEIR on page II-5. Both of these aspects of the project also lie entirely within the boundaries of the City of Los Angeles. Though County SEA policies apply only to unincorporated areas, could not the City of LA bring Significant Ecological Area 40 into it's own planning? Perhaps the current Agricultural land use designations could be revised to reflect a new 'Environmental' land use designation. Such a revision could allow for continuance of vital wildlife community services, create environmental easement parameters and establish any number of other environmentally friendly guidelines that would prevent the further degradation of the City of LA's natural resources. Of particular preservation value is viewshed. One need only travel to Santa Clarita (north on Interstate 5) to encounter the effects of 'lost' viewshed resources due to high-density residential development.

135-8

Too many discretionary actions are required for the project to move forward. These discretionary actions include: amendments to land use and zoning designations set forth in the LA City General Plan and the Sunland-Tujunga Community Plan. Page 33 of the I. Summary Section of the DEIR states: "The proposed project would be consistent with the proposed zoning for the project site." This is more circular verbiage that I find insulting. I propose that this proposal be submitted for discretionary rejection by the lead agency, the City of Los Angeles.

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Thank you for your consideration and hosting this entire process as Lead Agency. Happy New Year 2004 to all at the Planning Department.

Regards,

LG Swan (nobody)
Sunland, CA

News Press / Burbank Leader • Real Estate • Saturday, November 15, 2003 • \$3

Approved Tentative Vested Map For 10 Homesites

(No. 48754)

LAND - 5.56 Acres
LOT SIZE - Min. 1 Acre
PARCEL SIZE - 24,000 SQ. FT.
VIEW - Gorgeous Views
GATED - Yes
EQUESTRIAN - Possible
PRICE - \$3,000,000



LA TUNA CANYON RD - YUINGA - L.A.
(10 Freeway)

Developed by [illegible] and [illegible] in partnership with [illegible]
[illegible] REAL ESTATE CO.