

Fred Dong – Canyon Hills EIR Comments

significant. The EIR must make this finding. This must be a conclusion of the EIR because there will be project residents after the development is built that are exposed to normally unacceptable levels of noise and thresholds of noise exceeding the test of significant.

The noise study was done utilizing manual counts of noise on September 12, 2002 which is actually Thursday and not Wednesday as noted by the Noise Consultant in Appendix H and September 13, 2002 which is Friday and not Thursday as noted by the Noise Consultant in Appendix H at five locations. Also the report indicates that 24 hour machine counts were conducted at two locations from September 13, 2002 which was Friday and not Thursday as noted by the Noise Consultant in Appendix H and Tuesday September 17, 2002.

The noise study at many locations is based on a very small population of readings. All the readings occurred in the fall months. There may be some variance in noise between spring, winter and fall months. Readings must be taken in other months of the year to eliminate seasonal noise variances. We believe that the noise readings that have been taken may not be accurate and represent the true noise levels found at those locations.

The number of readings taken is also not statistically significant because of amount of sample population is so small. The total population of readings that could be taken during a year would be 365 days except in a leap year. If you eliminate Saturdays and Sundays and observed Federal and State holidays assuming the holidays fell on a weekday instead of a weekend, you would eliminate 114 days from the possible population of observation days. If you also exclude non-school holiday period weekdays from the middle of June through the first week of September, Christmas-New Years Holiday period, Spring break holiday period, and an additional 5 weekdays that Los Angeles City Schools may not be in session due to administrative conference or workdays, another 77 days would be eliminated from the possible population of observation days. This would leave a possible population of 174 observation days.

If you take only 15 minute readings during the loudest times of the day for noise, between 7 am and 5 pm, a 10 hour time period per day, there would be 40 observation periods each day. This would mean that in any year, there would be 6,960 possible 15 minute observation times during business days at the busiest time of day.

The noise measurements at five locations were done only 15 minutes each for two days. The other locations were done for four consecutive days for 92.25 hrs at one location and 93.5 hrs at another location. This is about 4 days each. There are 278 observation days if you exclude non-school holiday period weekdays from the middle of June through the first week of September, Christmas-New Years Holiday period, Spring break holiday period, and an additional 5 weekdays that Los Angeles City Schools may not be in session due to administrative conference or workdays, and holidays.

The sample size calculating software was provided by Creative Research Systems.

I did some same size calculations to determine the statistical significance of such small population

Fred Dong – Canyon Hills EIR Comments

samples. The noise measurements at the five locations were done only 2 fifteen minute periods from a possible 6,960 observation periods. The results calculated at a 95% confidence level indicates that the confidence interval is 69 with 2 measurement taken out of a population of 6,960. That means that the EIR consultant can be 95% confident that the noise measurements represent the actual noise during the busy times of day only 31 % to 100% of the time. With the confidence interval so large, there is a great chance that these results are not representative of the true noise levels. Since the confidence interval is so large, there is a great chance that with only 2 observations that the results do not reflect the actual area traffic for a typical work day.

If the EIR consultant chose 4 days out of the 278 observation days in a year, at a 95% confidence level, the confidence interval would be about 49. That would mean that if the EIR consultant measured the noise at the two locations only 4 days each year, he would be 95% confident that the noise survey represents the actual area noise 51% to 100% of the time. Though this confidence interval still is large, it would at least mean that the noise measurement would more likely than not be representative of the actual area noise for those two sites.

It seems apparent with the low number of observation periods that more observation periods must be done to validate that the noise measurements used in the EIR are accurate.

We have included an explanation of the terminology used and other factors involving sample size from the Creative Research Systems website.

Sample Size Terminology

The **confidence interval** is the plus-or-minus figure usually reported in newspaper or television opinion poll results. For example, if you use a confidence interval of 4 and 47% percent of your sample picks an answer you can be "sure" that if you had asked the question of the entire relevant population between 43% (47-4) and 51% (47+4) would have picked that answer.

The **confidence level** tells you how sure you can be. It is expressed as a percentage and represents how often the true percentage of the population who would pick an answer lies within the confidence interval. The 95% confidence level means you can be 95% certain; the 99% confidence level means you can be 99% certain. Most researchers use the 95% confidence level. When you put the confidence level and the confidence interval together, you can say that you are 95% sure that the true percentage of the population is between 43% and 51%.

The wider the confidence interval you are willing to accept, the more certain you can be that the whole population answers would be within that range. For example, if you asked a sample of 1000 people in a city which brand of cola they preferred, and 60% said Brand A, you can be very certain that between 40 and 80% of all the people in the city actually do prefer that brand, but you cannot be so sure that between 59 and 61% of the people in the city prefer the brand.

Factors that Affect Confidence Intervals

There are three factors that determine the size of the confidence interval for a given confidence level. These are: sample size, percentage and population size.

Sample Size

The larger your sample, the more sure you can be that their answers truly reflect the population. This indicates that for a given confidence level, the larger your sample size, the smaller your confidence interval. However, the relationship is not linear (i.e., doubling the sample size does not halve the confidence interval).

Percentage

Your accuracy also depends on the percentage of your sample that picks a particular answer. If 99% of your sample said "Yes" and 1% said "No" the chances of error are remote, irrespective of sample size. However, if the percentages are 51% and 49% the chances of error are much greater. It is easier to be sure of extreme answers than of middle-of-the-road ones.

When determining the sample size needed for a given level of accuracy you must use the worst case percentage (50%). You should also use this percentage if you want to determine a general level of accuracy for a sample you already have. To determine the confidence interval for a specific answer your sample has given, you can use the percentage picking that answer and get a smaller interval.

Population Size

How many people are there in the group your sample represents? This may be the number of people in a city you are studying, the number of people who buy new cars, etc. Often you may not know the exact population size. This is not a problem. The mathematics of probability proves the size of the population is irrelevant, unless the size of the sample exceeds a few percent of the total population you are examining. This means that a sample of 500 people is equally useful in examining the opinions of a state of 15,000,000 as it would a city of 100,000. For this reason, The Survey System ignores the population size when it is "large" or unknown. Population size is only likely to be a factor when you work with a relatively small and known group of people (e.g., the members of an association).

The confidence interval calculations assume you have a genuine random sample of the relevant population. If your sample is not truly random, you cannot rely on the intervals. Non-random samples usually result from some flaw in the sampling procedure. An example of such a flaw is to only call people during the day, and miss almost everyone who works. For most purposes, the non-working population cannot be assumed to accurately represent the entire (working and non-working) population.

Also, the noise calculations on the project residents failed to take into account atmospheric conditions. If there are clouds or fog in the vicinity, these would reflect noise that would

Fred Dong – Canyon Hills EIR Comments

normally be dissipated into the atmosphere, back at the project residents. Many residents in the Crescenta Valley area will be able to tell you that freeway noise from I-210 is louder when those atmospheric conditions occur. When this happens, even if there are sound walls, many areas of the development may be subject to noise equal or exceeding 70 dBA. This level of noise would be considered Normally Unacceptable. There must be a discussion of this in the EIR because this condition is common in the winter and sometimes in the spring and fall when it is cooler. This condition is not a remote or uncommon occurrence.

There are additional areas concerning noise that the EIR must discuss. The EIR must be corrected to reflect the impacts of the average expected construction noise output and the maximum expected construction noise output.

Section IV. F ARTIFICIAL LIGHT AND GLARE

The EIR describes many vantage points that residents and road travelers can see no light from the project areas as there is no lighting currently in the project areas. The EIR should discuss what someone utilizing the public land that the Santa Monica Mountains Conservancy owns across the street from Development Area B. There is some possibility that there may be people that utilize this area at night. There are picnic tables and there are groups that conduct night hikes in local area trails. So, there would be impact on these people that use this public land and saw light from Development Area B.

The EIR states in several places that there currently is no light from the project area. On page IV.F-2 the EIR states, “Currently, there are no sources of lighting on the project site”. The EIR also calculates the amount of time traveling on I-210 both in the East and West directions and La Tuna Canyon how much time an observer traveling on these roads would see darkness looking into the project areas. The EIR also discusses what current residents that surround the project area experience in terms of light from the project area. These residents since there is no light from the project area experience no light pollution.

CEQA guidelines Section 15382 defines a significant effect on the environment as a substantial or potentially substantial, adverse change in any of the physical conditions with the area affected by the project. All area viewers, whether they are nighttime hikers, road travelers, nearby area residents, or wildlife that is also mentioned in the EIR see no light from the project area. No matter what mitigation measures are used unless the mitigation does not allow project residents the use of lights at night and no street lights are constructed and used will have a significant and unavoidable impact by artificial light and glare from the project. Since there is no light from the project area now, any light would be a significant impact.

The EIR must be changed to reflect that even after mitigation, the impact of artificial light and glare from the project is significant and unavoidable after mitigation. If this conclusion in the EIR is not changed to reflect this, it would be very misleading to a user of the EIR.

Fred Dong – Canyon Hills EIR Comments

Section IV. G LAND USE

According to Sunland-Tujunga Community plan, the implementation of the Land Use Map is the Zoning Ordinance. The Zoning Ordinance and the Zoning Map will identify specific types of land use, intensity of use and development standards applicable to specific areas and parcels of land within the community.

The Community Plan further states in the section on Plan Consistency the following.

Each Plan category indicates the corresponding zones permitted by the Plan unless further restricted by the Plan text, footnotes, adopted Specific Plans or other specific limitations on discretionary approvals. The Plan recognizes that achieving the full residential densities and the commercial and industrial intensities depicted on the Plan map will not occur due to Plan restrictions and economic limitations.

For each plan category, the Plan permits all identified corresponding zones, as well as those zones which are more restrictive, as referenced in Section 12.23 of the Los Angeles Municipal Code (LAMC). Any subsequent action that modifies the Plan or any monitoring review that results in changes to the Plan must make new Plan consistency findings at the time of the decision.

City actions on most discretionary projects require a finding that the action is consistent or in conformance with the General Plan. In addition to the required general finding, decision-makers acting on certain projects in the Plan area shall refer to each of the applicable additional findings that the Plan identifies as programs in Chapter 3 of the Plan. To further substantiate the consistency findings, decision makers may cite other programs, policies or objectives which would be furthered by a proposed project. In addition, Chapter 5 of the Plan requires a decision maker to make a finding of conformance with applicable design standards for discretionary projects.

The Community Plan further discusses what all new developments in the area must achieve.

Residential land use patterns vary greatly according to local conditions in the areas which comprise the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan. Topography, population characteristics, housing markets, age of housing and degree of existing development have a great influence on the density of development throughout the community. Much of the existing density in the community was established by natural controls such as topography, large amounts of existing available land and infrastructure.

There have been varying degrees of pressure for development in the Plan area. Some new development has been inconsistent with existing development. Some areas have experienced development pressure for higher density housing.

The proposed development must fulfill a number of objectives and policies to be consistent with the Community Plan. The EIR must discuss how the project does or does not meet these

Fred Dong – Canyon Hills EIR Comments

objectives and policies. We are listing some of the important Community Plan Land Use objectives and policies below.

GOAL 1 A SAFE, SECURE, AND HIGH QUALITY RESIDENTIAL ENVIRONMENT FOR ALL ECONOMIC, AGE, AND ETHNIC SEGMENTS OF THE COMMUNITY.

Objective 1-3 To preserve and enhance the varied and distinct residential character and integrity of existing single and multi-family neighborhoods.

Policies

1-3.1 Consider factors such as neighborhood character and identity, compatibility of land uses, impacts on livability, impacts on services and public facilities, impacts on traffic levels, and environmental impacts when changes in residential densities are proposed.

***Program:* The decision-maker should adopt a finding which addresses these factors as part of any decision relating to changes in planned residential densities.**

1-3.2 Seek a high degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.

***Program:* The Plan includes Design Guidelines which establish design standards for residential development to implement this policy.**

1-3.3 Preserve existing views of hillside and mountainous areas.

***Program:* Retention of the low density rural character of the community and height limitations, scenic highway designations, implementation of the Citywide Hillside Ordinance and the 15% Slope Density Ordinance will contribute to the preservation of these views.**

Objective 1-6 To limit residential density and minimize grading in hillside areas.

Policies

1-6.1 Ensure the availability of adequate sewers, drainage facilities, fire protection services and facilities and other public utilities to support development within the hillside areas.

***Program:* A decision-maker should adopt a finding which addresses the availability of these services and utilities as part of any decision relating to hillside residential development.**

1-6.2 Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area.

***Program:* The Plan designates hillside areas in the Minimum and Very Low Densities of the General Plan land use designations and corresponding zones.**

***Program:* Continue implementation of the Citywide Hillside Ordinance and the 15% Slope Density Ordinance.**

1-6.3 Require that grading be minimized to reduce the effects on

Fred Dong – Canyon Hills EIR Comments

environmentally sensitive areas.

Program: Compliance with the California Environmental Quality Act (CEQA) requires that local and state governmental agencies consider and disclose potential environmental effects of a project before rendering a decision, and provide methods to mitigate those impacts.

Objective 1-7 To insure compatibility between equestrian and other uses found in the RA Zone.

Policies

1-7.1 Place a high priority on the preservation of horsekeeping areas.

Program: A decision-maker involved in a discretionary review should make a finding that the zone variance, conditional use, or subdivision does not endanger the preservation of horsekeeping uses within the Community.

Objective 1-8 To promote and protect the existing rural, single-family equestrian oriented neighborhoods in RA zoned areas and “K” Districts. To caution against possible precedent-setting actions including zone variance, conditional use, or subdivision that might endanger the preservation of horsekeeping uses.

Policies

1-8.1 Protect existing single-family equestrian oriented neighborhoods and horsekeeping districts from encroachment by higher density residential and other incompatible uses.

Program: New development within these areas should be designed to encourage and protect the equestrian keeping lifestyle.

1-8.2 Horsekeeping areas should be developed at Minimum to Very Low densities appropriate to such use.

Program: The Plan Map identifies areas for lower residential densities.

1-8.3 New horsekeeping districts should be expanded where appropriate and feasible.

Program: The Plan Map identifies lower density residential areas appropriate for such districts.

The Community Plan has an objective 1-3 “To preserve and enhance the varied and distinct residential character and integrity of existing single and multi-family neighborhoods.” Policies in implementing this objective include “1-3.1-Consider factors such as neighborhood character and identity, compatibility of land uses, impacts on livability, impacts on services and public facilities, impacts on traffic levels, and environmental impacts when changes in residential densities are proposed” and “1-3.3-Preserve existing views of hillside and mountainous areas. Retention of the low density rural character of the community and height limitations, scenic highway designations, implementation of the Citywide Hillside Ordinance and the 15% Slope Density Ordinance will

Fred Dong – Canyon Hills EIR Comments

contribute to the preservation of these views.”

The proposed zoning and other land use changes do not conform with this objective and the policies discussed. This project will forever change the rural character of the area by having densities greater than what are currently allowed in the area and eliminating the possibility of having equestrian estates or property on the project site. Many of the area households are equestrian. It would be inconsistent to make large blocks of non-equestrian residences in this area. This development does not retain the low density rural character of the community nor does it help keep La Tuna Canyon Road and the Foothill Freeway as scenic highways. This project with its variances may be in conflict also with the Citywide Hillside Ordinance (Los Angeles Municipal Code Section 12.21.A.17) and the 15% Slope Density Ordinance.

The zoning changes and variances sought do not meet the Community Plan objective 1-6 of limiting residential density and minimize grading in hillside areas. This development is inconsistent with that objective. The zoning changes and variances conflict with the policy 1-6.2 of considering the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area. The applicant has not considered this policy and the programs of “The Plan designates hillside areas in the Minimum and Very Low Densities of the General Plan land use designations and corresponding zones.” and “Continue implementation of the Citywide Hillside Ordinance and the 15% Slope Density Ordinance.” The applicant’s proposal increases density and substantially increases grading that could be done compared to the 87 unit proposal. The development may be in violation of the Slope Density Ordinance LAMC §17.50 E. This project also violates Policy 1-6.3 that requires that grading be minimized to reduce the effects on environmentally sensitive areas. This project grades substantially more environmentally sensitive areas removing hundreds of oaks, sycamores, and other trees than a project like the 87 unit proposal.

The New Scenic Plan requires that the allowable dwelling be computed using the LAMC Slope Density Ordinance. The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan says,

Sec. 8. GENERAL DEVELOPMENT STANDARDS. The following regulations shall apply to all new projects within the Specific Plan area. Application of the following general development standards to a Project shall be determined by the Director of Planning or the Advisory Agency.

A. Slope Density. In acting on an application pursuant to LAMC Section 17.00, *et seq.*, for those Sites that are designated as Very Low I, Very Low II and Minimum density and are not located in whole or in part in a Prominent Ridgeline Protection Area, where the average natural slope of the Site is 15% or more, the Advisory Agency shall calculate the total allowable number of dwelling units pursuant to LAMC Section 17.05 C, *et seq.* Where feasible, the Advisory Agency shall require that the lots be situated on portions of the Site with less than a 15% slope unless the Site does not have sufficient area below the 15% slope portion of the Site.

Fred Dong – Canyon Hills EIR Comments

The zoning changes and variances sought do not meet the Community Plan objective 1-7 of insuring compatibility between equestrian and other uses found in the RA Zone. Community Plan's policy 1-7.1 requires that a high priority is placed on the preservation of horsekeeping areas. The La Tuna Canyon area where Development Area B is proposed is a rural equestrian community. Yet, Development Area B cannot have equestrian lots because the lot sizes are too small for equestrian residences. There are a number of equestrian residences that currently exist in the northern area, Development Area A. Again, this Development Area A will have lots too small for legal accommodation of new equestrian residences in the new development. This is also incompatible with the current area. The Community Plan places a high priority on the preservation of horsekeeping areas.

According to the Community Plan, the city which is involved in a discretionary review must make a finding that the zone variance, conditional use, or subdivision does not endanger the preservation of horsekeeping uses within the community. Clearly, this development proposal does endanger the preservation of horsekeeping and the city must make a finding against granting this project zoning changes or variances that would eliminate future equestrian use in both Development Areas A and B.

The zoning changes and variances sought do not meet the Community Plan objective 1-8 of promoting and protecting the existing rural, single-family equestrian oriented neighborhoods in RA zoned areas and "K" Districts. To caution against possible precedent-setting actions including zone variance, conditional use, or subdivision that might endanger the preservation of horsekeeping uses. Both the La Tuna Canyon area and the Sunland-Tujunga neighborhoods that would be adjacent to Development Areas A and B are rural single-family equestrian oriented neighborhoods. The project area land is primarily minimum density residential agricultural land. Allowing the change in zoning to RE-9 and RE-11 will significantly alter these neighborhoods. The community plan is to protect these areas. The community plan does not advocate changing zoning as it will be a bad precedent that would lead to the elimination of other rural and single-family equestrian areas.

To meet Community Plan objective 1-8, the Community Plan advocates that new development within these areas should be designed to encourage and protect the equestrian keeping lifestyle. This development does not encourage and protect the equestrian keeping lifestyle. The development providing a small 3 acre equestrian park while eliminating over 240 acres from future equestrian forever does little to encourage and protect the equestrian keeping lifestyle that is prevalent in that area.

A Community Plan policy for this area, 1-8.2 says that horsekeeping areas should be developed at Minimum to Very Low densities appropriate to such use. This project is not being developed at Minimum to Very Low densities. The project substantially increases density and eliminates this area as a future horsekeeping area. The Community Plan also says in policy 1-8.1 that existing single-family equestrian oriented neighborhoods and horsekeeping districts must be protected from encroachment by higher density residential and other incompatible uses. The proposed development is a higher density residential project that will encroach on the existing single-family

Fred Dong – Canyon Hills EIR Comments

equestrian oriented neighborhoods.

Most of the proposed area that would be developed is currently identified in the Community Plan for Minimum Residential. The balance of the proposed development area is Very Low I Residential. Based upon the conflicts with the Community Plan objectives and goals, the designations must not be changed and must remain as it is currently designated. The proposed development area that will be impacted is zoned as A1 Agricultural. Changes in the zoning would also conflict with the objectives and goals of the Community Plan. The current zoning must remain as the area is currently zoned to avoid conflicting with the Community Plan and creating a significant and unavoidable impact and inconsistency in the area land use.

The development site is within the Los Angeles County Significant Ecological Area (SEA) 40. The undeveloped areas of the Verdugo Mountains are within this SEA. The policies of the SEA are applicable to areas within Los Angeles County control. However, even though since the project is within the City of Los Angeles and not under Los Angeles County control, does not mean that the significance of this development's impact on the SEA must not be discussed.

Los Angeles County in the 1970s designated this as a SEA because this area is deemed to have significant ecological value. The Los Angeles County report on this SEA describes this area as an important habitat area. It indicates that compatible land uses for this SEA are open space and medium recreational uses. Thus a housing development is incompatible with the land use of the SEA. This is a significant and unavoidable impact that this development has on the SEA and this must be discussed as an impact of the development on land use.

The City of Los Angeles General Plan Policy 6.1.3 says "Reassess the environmental importance of the County of Los Angeles designated Significant Ecological Areas (SEAs) that occur within the City of Los Angeles and evaluate the appropriateness of the inclusion of other areas that may exhibit equivalent environmental value." The EIR must discuss the importance of this SEA in the EIR.

The zoning changes and other proposed modifications of the land use by this project are inconsistent with the Community Plan. Therefore, if the applicant continues to seek these changes, it would constitute a significant and unavoidable impact of the development that cannot be mitigated. The EIR must reach this conclusion, otherwise it would be misleading. CEQA guidelines Section 15382 defines a significant effect on the environment as a substantial or potentially substantial, adverse change in any of the physical conditions with the area affected by the project including land. A land use change from the current zoning would constitute a substantial change. Changing the character of the local neighborhoods would also constitute a substantial change.

Additionally, the development should meet all the standards of Community Design and Landscaping Standards contained in the Community Plan. We have included those in our discussion. If the developer cannot meet these standards, the EIR must explain why the development will not comply and any mitigation measures that the developer will use to comply

Fred Dong – Canyon Hills EIR Comments

with these standards.

COMMUNITY DESIGN AND LANDSCAPING STANDARDS

In addition to the establishment of Design Standards for individual projects, a community's identity can be enhanced through improvements to the streetscape and landscaping of public spaces and rights-of-way. It is the intent of this section to establish a set of guidelines that will serve to improve the environment, both aesthetically and physically, as opportunities in the Community Plan area occur which involve public improvements or other public and/or private projects that affect public spaces and rights-of-way.

A sense of entry should be created for the community from adjacent cities and communities, that serves to define boundaries, edges, and unique attributes. Public spaces and rights-of-way should capitalize on existing physical access to differentiate the community as a unique place in the City.

The presence or absence of street trees is an important ingredient in the aesthetic quality of an area. Consistent use of appropriate street trees provides shade during hot summer months, emphasizes sidewalk activity by separating vehicle and pedestrian traffic, and creates an area-wide identity which distinguishes neighborhoods within the Community Plan area from each other.

The following improvements are recommended:

ENTRYWAY IMPROVEMENTS-Provide improvements along principal streets and at major identified intersections and edges which clearly distinguish these locations as major streetscapes and entries. Such improvements may include elements such as signage, landscaping, vertical pylons and/or other distinctive treatments.

STREETSCAPE

1. Provide for coordinated streetscape design at identified entries to the Plan Area that includes street lighting, street furniture, and sidewalk/crosswalk improvements in the public right-of-way.
2. Establish a comprehensive streetscape and landscape improvement program for identified corridors and districts that will set standards and priorities for the selection and installation of the following:
 - a. Street trees
 - b. Street lighting
 - c. Streetscape elements (sidewalk/cross walk paving, street furniture)
 - d. Public signage
3. Identify locations for, and develop landscaped median strips within commercial streets, provided that there is adequate space, traffic flow, site access, and the proper street cross section to insert the medians.

STREET TREES

Select species which:

1. Enhance the pedestrian character, and convey a distinctive high quality visual image for the streets.

Fred Dong – Canyon Hills EIR Comments

2. Are drought and smog tolerant, and fire resistant.
3. Complement the existing street trees.

Establish a hierarchy for street trees which shall include:

1. **Major Accent Trees.** These trees should be located at entry location, intersections, and activity centers.
2. **Street Trees.** Select specific species to be the common tree for street frontages. A single flowering species may be selected for all residential neighborhoods and commercial districts or different species selected to distinguish one neighborhood, district, or street from another. In residential neighborhoods, the trees should be full, to provide shade and color. In commercial districts, the trees should provide shade, but be more transparent to promote views of store fronts and signs.
3. **Ornamental or Special Plantings.** At special areas along street frontages, such as linkages to pedestrian walkways and plazas and outdoor dining areas, ornamental trees providing shade and color should be utilized to emphasize and focus attention on those places.

STREET FURNITURE

Install street furniture that encourages pedestrian activity or physical and visual access to buildings and which is aesthetically pleasing, functional and comfortable. Street furniture may include such elements as bus and pedestrian benches, bus shelters, kiosks, trash receptacles, newspaper racks, bicycle racks, public telephones, landscaped planters, drinking fountains, and bollards. Priority should be given to pedestrian-oriented areas.

1. Install new street lights in commercial districts which are attractively designed, and compatible with facades and other street furniture, to provide adequate visibility, security, and a festive night time environment.
2. Establish a consistent street lighting type utilizing a light standard that is compatible with the overall street furniture and graphics/signage program.
3. Any new street lighting or pedestrian lighting system built in the public right-of-way must be designed to currently adopted City standards. Equipment must be tested and approved by the Bureau of Street Lighting.
4. New lighting systems will be designed to minimize glare and "light trespass".
5. No new or replacement street tree shall be planted closer than 20' from an existing or proposed streetlight. Exceptions will be considered by the Bureau of Street Lighting after reviewing mature tree characteristics.

Fred Dong – Canyon Hills EIR Comments

6. All new or replacement lighting systems require due process. Street lighting is installed through the formation of special assessment districts. Where any increase in special assessment is anticipated, public hearings are required.

7. Ornamental or historic poles can not be removed without the prior approval of the City's Cultural Affairs Commission.

SIDEWALKS/PAVING

1. Repave existing sidewalks and crosswalks where feasible and appropriate with brick pavers, concrete, or other safe, non-slip materials to create a distinctive pedestrian environment; and, for crosswalks, to visually and physically differentiate these from vehicle travel lanes and promote continuity between pedestrian sidewalks.

2. Develop sidewalk "pull-outs" at intersections, where they do not adversely impact traffic flow or safety, by extending the sidewalk to the depth of a parking stall to accommodate landscaping and street furniture and reduce the crosswalk width.

SIGNAGE

1. Establish a consistent design for all public signage, including fixture type, lettering, colors, symbols, and logos designed for specific areas or pathways.

2. Provide for distinctive signage which identifies principal entries to unique neighborhoods, historic structures, and public buildings and parks.

3. Assure that public signage complements and does not detract from adjacent commercial and residential uses.

4. Provide for signage which uniquely identifies the principal commercial areas.

PUBLIC OPEN SPACE AND PLAZAS

Establish public open space standards that will guide the design of new public plazas and open spaces. These standards should include the following:

1. Consideration of the siting of open space to maximize pedestrian accessibility and circulation.

2. Solar exposure or protection.

3. Adjacency to pedestrian routes and other open spaces.

4. Appropriate plant and hardscape materials.

The EIR must be modified and re-released to reflect the final local area Scenic Plan. The EIR discusses how the project may conform to the draft Scenic Plan. That plan has changed significantly. The EIR must discuss how the project conforms or does not conform to all elements of the Scenic Plan. No project must violate the final version of the Scenic Plan and modifications to the project may result from the passage of the Scenic Plan.

The EIR must discuss how this project meets or does not meet each of the goals of the San