



**OBJECTIONS TO THE CANYON HILLS PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT**

CASE NO. ENV-2002-2481-EIR

REFERENCE NO. SCH 2002091018

Prepared for:

Los Angeles City Planning Department

Prepared by:

William M. Funkhouser, Esq.
Law Office of William M. Funkhouser
6903 Beckett Street, Tujunga, CA 91042-2036 (818) 446-0137

The proposed draft environmental impact report [hereinafter referred to as the "draft report"] fails to comply with the standards for EIR adequacy as stated in section 15151 of the CEQA Guidelines:

"An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. ... The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

170-1

The draft report does not provide the planning department with the type of information needed to make informed decisions about the environmental consequences of this ill-conceived project. For example, Pages 11-4 and 11-5 of the draft report acknowledge that the project site is governed by, inter alia, the Sunland-Tujunga Community Plan and the Sun Valley Community Plan. The draft report then blandly and falsely asserts that "[T]he proposed project is consistent with the applicable policies of the Sunland-Tujunga and Sun Valley Community Plans."

A brief review of the policies of the Sunland-Tujunga and Sun Valley Community Plans [hereinafter referred to as the "community plan"] shows that the proposed project is not consistent with those policies:

- The community plan seeks to "limit residential density and minimize grading in hillside areas." In order to accomplish this objective, important land use policies are established.

- The planning department must consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan areas.
- To implement this policy, the community plan designates hillside areas in the Minimum and Very Low Densities of the Los Angeles General Plan land use designations.
- The proposed project lies in steep hillside areas. 748 acres are designated Minimum residential (1 dwelling unit per acre), 120 acres are designated Very Low 1 Residential (1 to 3 units per acre) and 10 acres are Very Low 2 Residential (3 to 4 units per acre). The proposed project seeks a variance from the community plan allowing a radical departure from existing housing density limitations in order to cluster approximately 280 homes on two adjacent, heavily-graded sites which total 194 acres.
- The community plan implements the Citywide Hillside Ordinance, the 15% Slope Density Ordinance, and requires that grading be minimized to reduce the effects on environmentally sensitive areas. The proposed project is incompatible with the community plan because it seeks authorization for massive grading of environmentally sensitive watershed areas in order to accommodate the clustering of 280 large homes on 194 acres.
- The community plan seeks to insure compatibility between equestrian and other uses found in the RA Zone. The policy places a high priority on the preservation of horse keeping areas and provides that a decision maker involved in a discretionary review should make a finding that the zone

170-1

170-2

170-3

variance, conditional use, or subdivision sought by a developer does not endanger the preservation of horse keeping uses within the community.

- The community plan seeks to promote and protect the existing rural, single-family equestrian-oriented neighborhoods in RA zoned areas and cautions against possible precedent-setting actions including zone variance, conditional use, or subdivision that might endanger the preservation of horse keeping areas.
- The policy of the community plan is to protect existing single-family equestrian oriented neighborhoods from encroachment by higher density residential developments.
- New development within the areas covered by the community plan should be designed to encourage and protect the equestrian keeping lifestyle.
- The proposed project seeks exactly the sort of variance the community plan cautions against- a variance which would cut off existing equestrian neighborhoods in La Tuna Canyon from the lush Verdugo Mountain watershed.

170-3

The Verdugo Mountains are a unique recreational resource. Hundreds of bicyclists, horsemen, and hikers use the trails in the Verdugo Mountains every day. A large portion of the higher elevations of the Verdugo Mountains have already been incorporated into designated open space areas. Driving West bound along I210 [through Tujunga and Sunland] one observes a nearly pristine mountain environment, completely unmarred by massive, heavily-graded hillside developments.

170-4

According to the draft report, 637 acres (72% of the project), lies on land within the boundaries of the Sunland-Tujunga Community Plan area. The community plan area contains approximately 15,899 acres and is generally bounded by permanent open space, including the Santa Monica Mountain Conservancy parkland to the south, the Angeles National Forest and Lopez Canyon Restoration Project on the north, the Shadow Hills and Lake View Terrace communities on the west and the Angeles National Forest and the City of Glendale on the east.

This unique urban resource should be protected for the enjoyment of the people of the City of Los Angeles. Development along the northern side of the Verdugo Mountain watershed should be constructed in conformity with the land use provisions of the community plan.

170-4

The draft report itself acknowledges that the project site could be developed in accordance with the community plan [See Overview of Selected Alternatives, Alternative D: Reduced Density, 87 lots, page VI-42]. The draft report describes the reduced density alternative as follows:

"Under this alternative, the entire 887-acre project site would be developed with 87 large single-family lots, or 'ranchettes'. This is the maximum number of homes that can currently be developed on the project site under the current General Plan land use designations for the project site and the City's slope density ordinance (see Section 17.05 C of the LAMC). Lots under this design would range in size from 5 acres to 26.9 acres, and would average 10.2 acres ..."

The draft report completely fails to address the significant and adverse environmental impacts the project will have on our community. It also completely fails to explain why variances from the existing land use designations should be granted. The City will lose a unique resource if the

170-5

project proceeds. Yet the proponents of the project have not addressed the very substantial environmental impacts the project will have on the Verdugo Mountain watershed and the adjacent communities. Accordingly, the draft environmental report should be rejected and withdrawn or revised to squarely address (rather than gloss over) the adverse environmental impacts of the proposed project.

170-5

Dated: December 30, 2003

Law Office of William M. Funkhouser



William M. Funkhouser