On page IV.D-139, the DEIR states, "mountain lions require home ranges with average home range of a female covering approx. 48 sq. miles and male requiring up to 187.3 square miles....." I am concerned that the mountain lion I saw is now on 18 sq. miles, and what space will the mountain lion have once the Canyon Hills Project begins? I believe the DEIR minimizes the impacts of the Canyon Hills Project on wildlife, and the DEIR fails to address how it will protect the wildlife on or near the project site.

I don't think the new community in the Canyon Hills Project area will tolerate mountain lions, coyotes and rattlesnakes, etc. in their area. I feel the project will have detrimental effects on wildlife and rare habitat.

TRAFFIC:

I believe the expected traffic the DEIR predicts is inaccurate and an understatement. What about other sources of traffic (gardeners, delivery trucks, maids, visitors, baby-sitters, driving to schools, etc.); the DEIR did not account for such traffic.

I think the traffic will have a huge negative impact on the community, and decrease the quality of life for the current residence. (Increase of smog and traffic on streets, in markets and in stores).

EMERGENCY ACCESS PROPOSED FROM AREA A:

In my opinion there will be dangers to the cyclist, pedestrians walking, and children that play in the streets on Hillhaven, Inspiration Way and Verdugo Cresline Drive if large construction trucks are allowed to use these roads. Most of these streets have no sidewalks. I walk from my house at 9755 Hillhaven Ave. up to the Verdugo Mountains very often, and I already feel the walk is a bit dangerous because of the lack of sidewalks. When I am walking and lined up with two cars that are passing each other, I have to get off of the street and stand on the side of the road until the two cars pass by, because when there are two cars passing each other, the cars usually move to the side of the road where pedestrians may be walking. When the cars are gone, then I can return to the street. How is this going to work with a large construction truck? There is just no room on these narrow streets to allow for the proposed 20-foot minimum.

There is a blind curve on Hillhaven, which makes it close to impossible for any vehicles to see the opposing traffic and any pedestrians, which might be walking in the street in the area of the blind curve, and there are no sidewalks in the area of the blind curve. Large construction trucks will endanger any other cars, pedestrians or even adjacent properties since it is also plagued with a very steep incline. A truck loosing control in this curve due to its adverse conditions could have catastrophic consequences.

What about the children that live in the area of the emergency access road and play in the streets - I believe that the driver of a construction truck has restricted vision of the road, and that could be unsafe for children or anybody on such narrow streets that have no sidewalks. I let my 2 1/2-year-old walk these streets because there are very few cars that drive by on Inspiration Way and Verdugo Crystalline Drive, but what are we and people like me going to do when large trucks start using these streets? It's currently a very popular spot for cyclist, and the localist to walk.

What about after the project - is this emergency access road proposed from Area A going to be open to the home owners that live in the new Canyon Hills homes? Though the access is proposed as limited with a locked gate, there is precedence for such gates to be removed by area residents, which occurred in the Crystal View development. What will this do to the quality of life for the people who live in the homes on the way to the Canyon Hills homes. They will have much more traffic and pollution. My real-estate agent informed me that the value of our home has already decreased because of increased traffic on Hillhaven Ave., due to new scattered houses that were built above us, and the same will be for all of these homes on the emergency road, the new traffic after the project will decrease the value of their homes.

The potential impact of this access road needs a more complete study. The DEIR is inadequate in its failure to address many issues about the access road.

Pollution:

Large construction trucks that run on diesel fuel will increase pollution on the streets on the emergency access road.

Noise:

Large construction trucks are loud, and some of the houses on the narrow emergency access road don't have much of a front yard and are close to the street, and thus will experience a significant decrease in quality of life due to the trucks noise and pollution.

CONCLUSION:

I urge the City to require the Canyon Hills DEIR to be re-issued after all of the issues are adequately analyzed. I believe the EIR is inadequate and seriously understates the impact of this development on the community.

The current zoning law allows for the building of no more than 87 homes on the Canyon Hills property. I urge the City to require the Canyon Hills project to stay within all the current laws and codes, and within the guidelines of the Scenic Preservation Specific Plan and the Community Plan.

Thank you for giving me and many others the opportunity to express our comments. I hope you will take my considerations and those of other people in mind. Many of the people I know that live in this area chose to move here because of the rural atmosphere and beauty, and would like to preserve it. I feel I really know this area, and I moved here for the same reasons many others I know did. All of my neighbors I've talked to about the project are very disappointed that there may be an increase in traffic on Hillhaven Ave.

Sincerely,

Tina Krippendorf

Tima Kruppenday

December 3, 2003

Maya Zaitzevsky, Project Coordinator City of Los Angeles Department of City Planning 200 North Spring Street, Room 763 Los Angeles, California 90012

Re: Canyon Hills Project ENV-2002-2481-EIR SCH No. 2002091018 October 2003

Ms. Maya Zaitzevsky,

On behalf of the Shadow Hills Property Owners Association (SHPOA), I wish to express loud and clear that the proposed Canyon Hills Project fails to meet even the most basic guidelines of the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan (heretofore to be referred to as the "Community Plan") despite the frequent claims throughout the Canyon Hills Project Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") that it does so. According to the Community Plan, the Canyon Hills Development Area B is located in an area designated to remain at Minimum Density development ie zone designations of RE-40, A2 or A5. As per the Generalized Summary of Zoning Regulations of the City of Los Angeles RE-40, the smallest allowable Minimum Density Lot at 40,000 sq. ft./lot is approximately 0.91 acres/lot. According to the DEIR Summary Page I-4/I-5, Development B is projected to have 69 homes on 52 acres which would average out to approximately 0.67 acres/lot. The Community Plan places Canyon Hills Development A in an area foreseen to be developed as Low Residential I density ie Zone designations of RE-20 or RA. The proposed Canyon Hills Project Development Area A asks approval of 211 lots (DEIR I-4/I-5), most of which are requesting a zone variance to either RE-9-H or RE-11-H (DEIR IV.G-16). Neither an RE-9 (minimum 9,000 sq. ft./lot) nor an RE-11 (minimum 11,000 sq. ft./lot) zoned property is legally large enough for the keeping of equines as per the LAMC Sec. 12.07.01-A-3-b which states that the minimum size lot for the keeping of equines within the bounds of the City of Los Angeles must be 17,500 sq. ft./lot. The Canyon Hills DEIR erroneously claims equine-keeping capacity of it's proposed RE-11 lots (DEIR IV-G-4).

The above figures, by no means, honor the heart and goal of the Community Plan which offers guidelines to help future developments preserve the rural and equestrian characteristic of the residential neighborhoods of our corner of the City.

I refer to just a few entries within the Community Plan:

- 1-1.2 Protect existing single residential neighborhoods from encroachment by higher density residential and other incompatible uses.
- 1-1.4 The City should promote neighborhood preservation in existing residential neighborhoods.

Program: Residential land use categories, zone changes, subdivisions, parcel maps, variances, conditional uses, specific plans, community and neighborhood revitalization programs for residential projects shall be consistent with Plan recommendations.

- 1-3 To preserve and enhance the varied and distinct residential character and integrity of existing single and multifamily neighborhoods.
- 1-3.3 Preserve existing views of hillside and mountainous areas
- 1-6 To limit residential density and minimize grading in hillside areas (Esp. as per) 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.
- 1-7.1 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.
- 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.
- 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.

La Tuna Canyon is one of the last vestiges of agricultural property in the City of Los Angeles with lots large enough for people to keep horses or other animals, or to grow a small orchard or beautiful expansive garden or simply to call a segment of a natural ecosystem their own. The existing neighborhood of western La Tuna Canyon is one of rural equestrian Minimum Density properties, often larger than the A5's minimum 5 acres, with a strong equine population. The properties are somewhat set back from La Tuna Canyon Road, but remain on the flatlands never encroaching on the hillsides thereby retaining the natural beauty and serenity of the canyon. The topography, flora and fauna of the hillsides remains undisturbed. This is the rustic rural equine-keeping character of the canyon today, this is the character that we ask Canyon Hills – that the Canyon Hills Project should – respect and make every attempt to preserve.

If the Canyon Hills Project is approved as designed, it would irrevocably alter the protective and restrictive nature of the Community Plan thereby literally paving a precedent-setting pattern for future developments and variances. If this is allowed to happen, we may just as well burn the Community Plan for that is all the value it would actually appear to posses.

Elektra G.M. Kruger, President

Shadow Hills Property Owners Association

December 5, 2003

Maya Zaitzevsky, Project Coordinator City of Los Angeles Department of City Planning 200 North Spring Street, Room 763 Los Angeles, California 90012

Re: Canyon Hills Project ENV-2002-2481-EIR SCH No. 2002091018 October 2003

Ms. Zaitzevsky,

The Community certainly understands that it is a property owners' right, including those of the Canyon Hills Project, to develop their lands. We ask only that they abide by the development guidelines provided in the Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Community Plan (heretofore to be referred to as the "Community Plan") and similarly to abide by the restrictions laid out in the Los Angeles City Hillside Ordinance and Slope Density Formula (LAMC Sec. 17.05). The development guidelines set forth in the Community Plan assigns the Canyon Hills Development Area B as Minimum Density (A1, A2, or RE40) and the area of Canyon Hills Development A as Very Low Residential I (RE20 or RA). The Community Plan's Objective 1-8 States: "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." This very clearly states that zone changes, especially those that might alter the existing La Tuna Canyon equestrian character is markedly undesirable. If the Canyon Hills Development were to follow the existing zoning of it's entire 887 acres and abide by all Los Angeles City Hillside Ordinances and all Slope Density Formula restrictions, it would be allowed 87 units. To apply for a zone change permitting the construction of 280 units is totally out of line. This request is highly inconsistent with the Community Plan, although the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") frequently states, throughout the document, that it is in compliance with the Community Plan.

Given the topography of the Canyon Hills Project, the concept of "clustering" would be fully acceptable if it follows the intent of Footnote #7 and Footnote #4 of the Community Plan. While the clustering of lots in non-K districts might allow for RE-9 zoning, this should

be considered in combination with Objective 1-8 and Footnote #4 of the Community Plan which states: "Densities shall not exceed that which would be permitted using the slope density formula in LAMC Section 17.05C for lots: (a) in areas of steep topography planned for Very Low I, Very Low II and Minimum density; and (b) which would otherwise require extensive grading, involve soil instability erosion problems or access problems, as determined by the Deputy Advisory Agency." One should keep in mind that, as per the Community Plan, the area of Canyon Hills Development A is designated to be Very Low Residential I density (RE40 or RA). It is the intent of the Community Plan that the entitlements granted should be of the zone designations set forth in the Plan unless accompanied by a concurrent PLAN amendment. Once again, compliance with the Community Plan is in question.

If zone variances were to be seriously considered, it might well be in the interest of Whitebird to consider a variance inclusive of a K-overlay. This would reduce, to some extent, Community resistance against the development as a whole. These words come not from an equestrian, but from one who has served as President of a Homeowners Association of an equestrian community.

With one exception, that of Alternative D, all so-called "alternatives" are essentially mere re-orientations of the same picture. This hardly constitutes "alternatives" as should be presented in a DEIR. How about considering a clustered 87-unit equestrian estate development – one that has the somewhat "tucked-in" appearance as seen in the DEIR map Figure IV-N-20 – rather than units placed atop a ridgeline (not necessarily "prominent") from which they might break the skyline as some do in Figures IV-N-13, IV-N-14 and IV-N-17 of the DEIR.

Elektra G.M. Kruger, President

Shadow Hills Property Owners Association

December 5, 2003

Maya Zaitzevsky, Project Coordinator City of Los Angeles Department of City Planning 200 North Spring Street, Room 763 Los Angeles, California 90012

Re: Canyon Hills Project ENV-2002-2481-EIR SCH No. 2002091018 October 2003

Ms. Zaitzevsky,

The Community is of the opinion that the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") has sorely understated the increased traffic volume that the proposed Canyon Hills Development will add to the roads of our community. Based on the table IV-I-3, the DEIR assumes each new household to have less than 0.65 vehicles leaving at peak traffic hours of the morning and less than 0.80 vehicles returning at peak traffic hours of the evening. We must keep in mind that these homes are intended to be 4 or 5 bedroom homes with 3 car garages. From this one could easily extrapolate to the need for a two-income family resulting in a minimum of two vehicles leaving and returning at peak morning and evening hours respectively. Even in the rare instance in which a single income would suffice, a second vehicle trip might well be required to bring a child to his/her elementary or middle-school. A high school student may well provide his/her own transportation as would the occasional post-graduate student spending a few extra years in the family home while attending community college classes. All these additional potential peak hour drivers need to be considered as there is no reasonable public transportation service available. The nearest bus service is two miles away - and that is from the development entryway. The nearest of homes is still located a great distance further away along the proposed internal access way.

Even utilizing the figures determined by Linscott, Law and Greenspan Engineers for the Traffic Impact Study Pg 13/14 and Table 2 of the Technical Appendices of the DEIR, the present-day Average Daily Traffic (ADT) on La Tuna Canyon Road is13,081 vehicles per day. This was based on an automatic 24-hour machine traffic count conducted on La Tuna Canyon Road west of the I-210 interchange taken on two independent days. The DEIR states: "Over a 24-hour period, the proposed project is forecasted to generate 2,694 net new daily trip ends during a typical weekday." From these figures alone, the increased traffic

volume of a 280 home development would be totally unacceptable, especially if one were to take into account any future cumulative additions. By this, I am also not referring to such things as the Taco Bell on Foothill Blvd which the DEIR lists as a source of potentially significant local cumulative traffic volume increase, but such things as the 34 unit housing development that is now under construction in the western part of La Tuna Canyon itself. We are looking at a 20.6% total increase.

2,694 (New ADT)/13,081 (pre-dev ADT) = X%/100%X = 20.6% increased post-development A+B ADT

And of this, 15.5% is expected to pass through the proposed single ingress/egress of Development A.

211 (Dev. A homes)/280 (total homes) = X% (Dev. A homes)/100% (total homes) X = 75.4% (of total homes are in Area A) 20.6% (total post-development increased ADT) x 0.754 (portion coming from Dev A only) = 15.5% (total post-development increased ADT from Area A)

The existing intersection of I-210 and La Tuna Canyon Road can already be terribly congested especially at peak traffic hours. The Canyon Hills Project is proposing to construct it's single ingress/egress for the 211 Development A homes as a north leg of the existing WB I-210 on/off-ramp and La Tuna Canyon Road (Summary I-34). No traffic signal system can possibly be expected to mitigate the vehicle queue that will develop with the peak traffic of 211 homes and this proposal would certainly further clog the WB on/off-ramps of the I-210 which are already subject to congestion at peak traffic hours. The DEIR admits to the proposed project potentially creating significant traffic impact at this location during the AM and PM peak hours with an increased v/c ratio of 0.087 (0.700 to 0.787) to an LOS C (Summary I-34). This, I feel, is grossly understated for much of the same reasons expressed above for greater AM/PM traffic volume sources. The DEIR claims that at the eight other study intersections, traffic volume would be "incremental, but not significant" (Summary I-35). How can a 20.6% increase in total traffic volume be "incremental, but not significant"?

Furthermore, the DEIR has given no consideration to non-resident traffic – domestic help, gardeners, pool service, delivery trucks, babysitters, guests, etc.

Concern has been expressed by existing residents of Inspiration Way and Verdugo Crestline Drive. While the proposed Canyon Hills Project looks upon these as choices for the potential secondary emergency-only gated access, those gates may come down in the future at the demand of Canyon Hills residents tired of dealing with a single ingress/egress for daily traffic. This has happened before in a nearby development.

Elektra G.M. Kruger, President

Shadow Hills Property Owners Association

December 6, 2003

Maya Zaitzevsky, Project Coordinator City of Los Angeles Dept. of City Planning 200 North Spring Street, Room 763 Los Angeles, California 90012

Re: Canyon Hills Project ENV-2002-2481-EIR SCH No. 2002091018 October 2003

Ms. Zaitzevsky,

We have some serious reservations about the proposed Canyon Hills Project grading plans. Not meaning to be totally facetious, but what will they rename the project after they have cut up to 80 feet off the top of ridgelines (Canyon Hills Draft Environmental Impact Report IV-N-14) and used this to fill the project site canyons in order to maintain "balanced grading"?

4,600,000 or more cubic yards of grading effecting 240.2 acres of land (DEIR IV-N-38)! What happened to the Sunland – Tujunga - Lake View Terrace – Shadow Hills – East La Tuna Canyon Community Plan (heretofore to be referred to as the Community Plan) Objective 1-6 which states: "To limit residential density and minimize grading in hillside areas." We further reference Community Plan Policies:

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

1-6.3 "Require that grading be minimized to reduce the effects on environmentally sensitive areas."

We further reference Footnotes of the Community Plan:

Footnote #7 "Subdivision in steep hillside areas shall be designed in such a way as to preserve the ridgelines (note: this is not limited to "prominent" ridgelines!) and the steeper slopes as open space, limit the amount of grading required and to protect the natural hillside views. The total density allowed over the entire ownership shall be clustered in the more naturally level portions of the ownership." (Please take note of the phrase "naturally level" as opposed to "artificially created level".)

Footnote #19 "There shall be no grading of <u>principal</u> ridgelines (note: this again is not limited to "prominent ridgelines") within the Plan boundaries."

Footnote #4b "Densities shall not exceed that which would be permitted using the Slope

Density Formula in LAMC Section 17.05C for lots which would otherwise require extensive grading, involve soil instability erosion problems or access problems as determined by the Deputy Advisory Agency".

Readdressing Footnote #7 above, I quote from the DEIR IV-N-14: "Project development would require cut and fill grading operations to prepare the project site for the proposed residential construction. Within Development Area A, site preparation would require the landform alteration of approximately 156.7 acres. This grading would include the lowering of a secondary ridgeline, in some places by as much as 80 feet. I now quote the DEIR from IV-N-25/26: From this perspective (Photo simulation Figure IV-N-16), substantial alteration of the skyline would be apparent. The natural irregularities of the skyline would be removed and be replaced by a manufactured plateau effect. While the main portion of Development Area A would not be seen from this location, the edge of the development would appear as a line of homes arranged along the skyline and descending along a minor ridge which is not a designated Prominent Ridgeline in the Draft Specific Plan." I further quote the DEIR from IV-N-26/27. "Substantial landform alterations would be visible from this perspective. (Photo simulation Figure IV-N-18). Irregularities on the existing skyline would be straightened out and replaced with horizontal lines." These quotes stand in total disregard of the Community Plan thereby hopefully negating the Canyon Hills Project as proposed. I now quote the DEIR from IV-N-25/26: From this perspective (Photo simulation Figure IV-N-16), substantial alteration of the skyline would be apparent.

The DEIR often refers to being in compliance with the San Gabriel/Verdugo Mountains Scenic Preservation Plan (heretofore to be referred to as the Scenic Preservation Plan). Although technically not required to do so as the Scenic Preservation Plan is not yet a Council approved City Ordinance, the proposed Canyon Hills Project snubs the very essence of one of the major elements of the Scenic Preservation Plan – that of preserving the skyline viewshed as seen from designated Scenic Corridors. While not being constructed atop a designated "prominent ridgeline", many homes are proposed to be built atop secondary ridgelines and deliberately modified terrain causing them to break the silhouette of the modified skylines as seen from Scenic Corridor Highways such as La Tuna Canyon Road (DEIR IV-N-24, DEIR photo simulation figure IV-N-13). I further quote the DEIR from IV-N-24/25: ".... the proposed grading in this area would lower the existing skyline in order to create building sites. While easily visible from La Tuna Canyon Road, the homes in this area are well set back from the highway and several appear to be tucked into their building sites, although others clearly break the silhouette of the graded ridgeline." (Photo simulation Figure IV-N-14). I further quote the DEIR from IV-N-25: "This view of the eastern portion of Development A illustrates how the secondary ridgeline would be lowered and contoured to create building sites. New homes located along the west face of the ridgeline would not be visible from approaching westbound vehicles. However, new homes along the ridgeline would break the silhouette of the ridgeline as seen from eastbound vehicles." (Photo simulation Figure IV-N-15). I further quote the DEIR from IV-N-26: As the Prominent Ridgeline descends toward the south, the new homes can be seen to break the silhouette of the ridgeline." (Photo simulation IV-N-17). UNACCEPTABLE!

Elektra G.M. Kruger, Shadow Hills Property Owners Association

Hellin JM Kylon

December 7, 2003

Maya Zaitzevsky, Project Coordinator City of Los Angeles Dept. of City Planning 200 North Spring Street, Room 763 Los Angeles, California 90012

Re: Canyon Hills Project ENV-2002-2481-EIR SCH No. 2002091018 October 2003

Ms. Zaitzevsky,

The Community harbours serious reservations about the grading plans proposed by the Canyon Hills Project. We believe little effort has been made to honor the Sunland – Tujunga – Lake View Terrace – Shadow Hills – East La Tuna Canyon Community Plan (heretofore to be referred to as the "Community Plan").

I quote Footnote #7 from the Community Plan: "Subdivision in steep hillside areas shall be designed in such a way as to preserve the ridgelines and the steeper slopes as open space, limit the amount of grading required, and to protect the natural hillside views. The total density allowed over the entire ownership shall be clustered in the more naturally level portions of the ownership." I quote from the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") from IV-N-26: Substantial landform alterations would be visible from this perspective. (Photo simulation Figure IV-N-18). Irregularities in the existing skyline would be straightened out and replaced with horizontal lines." I further quote the DEIR from IV-N-37: "In some places, the existing skylines would be lowered and their natural forms reshaped into horizontal planes to support the proposed development." I further quote the DEIR from IV-N-38: "However, the proposed project would cause landform alterations to approximately 240.2 acres of land due to grading." "Within the proposed Development Areas, grading would transform the rugged skyline and complex terrain of the hillsides into more regular ordered patterns of horizontal planes. In some locations, such as the central portion of Development Area A, grading would reduce the height of an existing secondary ridgeline by as much as 80 feet." This hardly constitutes the "minimized grading and hillside viewshed protection" that Footnote #7 of the Community Plan promises us. I further quote the DEIR from IV-N-39: "While there is existing residential development along La Tuna Canyon Road west of the project site, it is tucked in along the sides of the road and does not dominate the landscape. However, some of the proposed homes in Development Area B would be elevated above La Tuna Canvon

Road and visible to passersby. Consequently, the substantial increase in the number of homes in the canyon and their high visibility from La Tuna Canyon Road would substantially impact the rural ambiance of that portion of La Tuna Canyon. For these reasons, the project could be considered to substantially degrade the existing visual character or quality of the Development Areas and the proposed projects impact on the visual character and quality of the project site would therefore be considered significant." We ask that Canyon Hills take a very close look at the existing residential development along La Tuna Canyon Road west of the project site and take some development guidelines away with him – homes set back from the roadway and tucked away at level terrain, undisturbed hillsides, respect for the minimum density development as laid forth in the Community Plan maps, etc. further keeping in mind our Community Plan Objective 1-3 which states: "To preserve and enhance the varied and distinct residential character and integrity of existing single and multi-family neighborhoods.

And what happened to Mitigation Measures?:

- 1. I quote from the DEIR IV-N-39: "All structures on the project site shall comply with the applicable requirements of the Draft San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan." Frequent breakage of skyline silhouettes hardly exemplifies any effort to honor the essence of the Draft Specific Plan. Furthermore, one might seriously question any honest commitment on the part of the Canyon Hills Project to honor the concept of the "Prominent Ridgeline" as designated "Prominent Ridgelines" have altered altitude in successive proposed Canyon Hills Project Development Maps resulting in the elimination of designation as "Prominent Ridgelines" at the very border of Canyon Hills land ownership.
- 2. I further quote from the DEIR IV-N-41: "Project impacts with respect to scenic vistas, scenic resources and existing visual character would remain significant following implementation of the recommended mitigation measures." If impacts will remain "significant" despite mitigation, how can this project possibly be approved as proposed?

This thoughtless landform alteration is totally unacceptable by a community so wholeheartedly dedicated to preserving the wonderful natural contours of the hills about us while still allowing for reasonable population expansion – here that allowance being for the 87 units permissible by existing Zoning, Hillside Ordinance and Slope Density restrictions imparted on the totality of the Canyon Hills 887 acre ownership. As proposed, the Canyon Hills Project irrevocably alters the topography of the project site. I quote from the DEIR IV-N-37: "While some may consider the introduction of a residential development into an undisturbed hillside as a significant intrusion under any circumstances, others may consider a sensitively-designed project as an asset to the community and desire to purchase homes there." Yes, a "sensitively-designed" project certainly could be an asset to the community, but as so many submitted letters to yourself must be making very clear, Canyon Hills hardly classifies as a "sensitively-designed" project.

Gliller Jun Hingen

December 8, 2003

Maya Zaitzevsky, Project Coordinator City of Los Angeles Dept. of City Planning 200 North Spring Street, Room 763 Los Angeles, California 90012

Re: Canyon Hills Project ENV-2002-2481-EIR SCH No. 2002091018 October 2003

Ms. Zaitzevsky,

We seriously question the program of native California Coast Live Oak and Western Sycamore tree loss mitigation on the Canyon Hills Project as proposed in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR"). The proposed plan to mitigate the loss of up to 232 native California Coast Live Oaks and 27 Western Sycamores (DEIR CD-rom Biology File under Summary section Native Trees) is as follows according to the DEIR (Table IV-D-16 and CD-rom Biology File under Summary section Native Trees):

- 1. Entry points: 15 California Coast Live Oaks, 60" to 36" boxes
- 2. Parks and Common Areas: 205 California Coast Live Oaks, 36" to 24" boxes
- 3. Road Right-of-ways: 515 California Coast Live Oaks, 24" boxes to 15 gal
- 4. Private Lots: 250 California Coast Live Oaks, 15 gal
- 5. Detention Basins: 60 California Coast Live Oaks, 15 gal, 5 gal and 1 gal 90 Western Sycamores, 15 gal, 5 gal, and 1 gal
- 6. Slopes: 100 California Coast Live Oaks, 5 gal and 1 gal
- 7. Flood Control: 60 California Coast Live Oaks, 15 gal, 5 gal and 1 gal 91 Western Sycamores, 15 gal, 5 gal and 1 gal
- 8. Fuel Modification Areas: 365 California Coast Live Oaks, 1 gal, seedlings and acorns
- 9. Proposed Equestrian Trail: 200 California Coast Live Oaks, seedlings and acorns
- 10. Damaged Riparian Habitat: 0

This certainly appears impressive at the outset when compared to the requirements of the LAMC Oak Tree Ordinance Section 46.02 (c)1 which requires the replacement of any oak approved for removal by at least two trees within the same property boundaries and that