

December 16, 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,

However minor a concern, we would like to address the level of mitigation set forth in the Canyon Hills Draft Environmental Impact Report relative to the controversy over the potential effects of Electro-Magnetic Fields. There is such great controversy over whether there is or is not any significant effect on public health to those living in the vicinity of transmission towers emitting high levels of electro-magnetic waves that we do not wish to take a stand on one side or the other. However, we do feel that persons wishing to purchase homes in the Canyon Hills Project should be provided with information publicly available regarding suspected potential health risks. In the DEIR, EMF mitigation is defined as providing purchasers with information on where they themselves must go to obtain the information. Not everyone is computer-savvy enough to utilize the Internet to research this information and to obtain this information from public offices is not always the easiest. We feel that Canyon Hills should provide purchasers pamphlets with information about the controversy and do this not as a part of the purchase package, but as part of an information packet that all real estate agents make available to potential buyers.

A totally different subject: The DEIR did mention that excavation of cut slopes adjacent to existing neighborhoods may expose seepage associated with the drainfields of existing private sewage disposal systems. The DEIR claims that even if this were to happen they do not expect any negative effect to groundwater and that due to its distance from Development A fails to suggest potential impact. We beg to differ with this evaluation. Odors that would be associated with exposure of the drainfields would most certainly effect not only Development A, but the existing neighborhoods to the northeast. Cut slopes anywhere near possible sewage drainfields must be eliminated from the site plan

The DEIR also is highly lacking in full consideration of all "Cumulative Impacts" within the area. As per CEQA Section 15355, all EIR's are required to consider the environmental impacts not only of the project itself, but also of impacts of ALL other projects in the vicinity. The DEIR has referenced only projects in already crowded urban and suburban areas totally different in character from the La Tuna Canyon with no reference to the more open, more rural neighborhoods of the canyon itself nor the mountains of the Verdugos as a whole that have been or may be notably impacted in the near future. The language of the CEQA regulations also implies that within a single project there can be cumulative environmental impacts. While addressing each individual issue and providing mitigation measures for individual factors, the DEIR never looks at the entire project, along with all its environmental impacts, as a cumulative whole to be addressed. A true picture of the entire impact of the Canyon Hills Project due to losses of biological resources is never addressed as a whole, but segregated into eg "trees" with no connection of the tree's place in the whole biological picture in terms of their integration with animals, soils, aesthetics etc. Thus the DEIR lacks focus on the total environment which this development would impact, thereby missing the whole inherent purpose of an EIR. The full impact of issues even within the Canyon Hills Project itself is often not undertaken using the excuse of "unable to evaluate due to inaccessible terrain." This illustrates a lack of true first-hand knowledge of the specific terrain on the part of the surveyors and the developers. The DEIR repeatedly cites other studies failing to integrate them into a comprehensive analysis of the total impacts of Canyon Hills. Cumulative Impact Analyses should include current, past AND reasonably foreseeable future projects in the region of the proposed project. A current project, of far greater impact than eg the Taco Bell on Foothill Blvd, is the 34 unit development under construction in the western portion of the canyon itself. Cumulative impacts of projects of the recent past - Oakmont I-IV which has markedly impacted the environmental habitat of the Verdugos. And the reasonably foreseeable future - there are a lot of sale signs - some for multi-acreage. What potential for future development and its cumulative effect on the environment do these bring to the Verdugo's. The EIR should discuss the cumulative effects of all proposed or planned projects in the region. The EIR should identify all private holdings in the Verdugo Mountains with some reference to their potential as future development areas. It is necessary to have a complete cumulative impact analysis to ensure that a project is not approved that when viewed separately may not appear to have a markedly significant environmental impact, but when taken together with others have a very significant adverse effect on the environment. The ever-shrinking habitat for Verdugo wildlife, the ever-increasing traffic congestion of La Tuna Canyon Rd and the I-210, the ever-increasing demands on already over-taxed services and the very worse for us in the northeast corner of the city, the precedent for ever-increasing higher density zone changes that will forever totally alter the rustic rural equestrian atmosphere of the canyon and its ecosystem. I reference Section 12.27 of the LAMC related to the subject of Variances. A Variance shall not be used to grant a special privilege or to permit a use substantially inconsistent with the limitations upon other properties in the same zone and vicinity. It should be denied if the need for the variance were self-imposed. Canyon Hills as designed in the DEIR is totally inconsistent with the rural, equestrian lifestyle of the remainder of the canyon and is totally contrary to the zoning in the map of the Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Community Plan. The so-called need for variance is strictly financial for a land-speculative company.



December 20, 2003

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City of Los Angeles Dept. of City Planning
200 North Spring Street, Room 763
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Re: Canyon Hills Project
ENV-2002-2481-EIR
SCH No. 2002091018
October 2003

Ms. Zaitzevsky,

We find several aspects of the cultural, archeological and paleontological surveys of the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") to be inadequate.

References in the body of this letter come from the DEIR IV-O and Appendix L. Cultural, archeological and paleontological records reviews were conducted through a variety of information sources seeking any references to recorded resources on or within ½ mile radius of the Project Site. This records check revealed no presence of these reviewed resources. Mention was made in the DEIR of two prior field surveys that had assessed "portions of the property." The DEIR did not clarify what constituted "portions of the property", failed to define the nature of the items sought nor provided even the slightest indication of how thorough these "assessments" were. The DEIR mentioned five additional field surveys conducted on adjoining parcels, however references to these assessments were no more complete than those for the project site itself. A two-day field survey of the project site was conducted on July 24/July 25, 2001. Quoting the DEIR: "This was necessary to determine the current status of previously recorded cultural resources and to document any prehistoric or historic sites or features which have not been previously recorded." "Because of the lack of a previous survey over the entire 887-acre of the project site, it was prudent to conduct a survey of the project site in order to determine if any cultural resources would be impacted during the construction phase. Only those portions of the parcel possessing an angle of slope of fifteen degrees or less could be examined. The survey was conducted by two field persons walking parallel tracts approximately ten meters (30 feet) apart over all accessible portions of the property. Access to much of the project site was limited due to private roads, lack of access from I-210 and overall ruggedness of the project site. More than two-thirds of the project site is located on slopes greater than 15 degrees. It is highly unlikely that

archeological remains would exist in these locations. A total of less than **fifty** acres was accessible. No cultural remains, either prehistoric or historic, were noted in those portions of the project site where access was possible." Fifty acres? What happened to "because of the lack of a previous survey over the **entire 887-acre of the project site it was prudent to conduct a survey of the project site**". I am not the worlds greatest mathematician, but:

50 acres surveyed/887 total acreage = X% project site surveyed/100%
X% = approximately **5.7%**

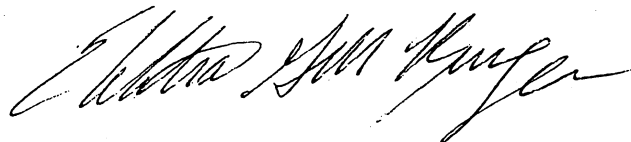
Even considering nothing more than the Development footprint acreage:

50 acres surveyed/194 acres Dev. A + Dev. B = X% development footprint surveyed/100%
X% = slightly less than **30%!**

5.7% (or even 30%) hardly constitutes a thorough cultural or archeological survey of the site. Additionally, the archeologists conducting the field survey did not indicate whether they disturbed any earth looking for artifacts that might be buried. There should have been some field search, however simplistic, for buried artifacts in areas which may have harbored human habitation or nomadic hunting/gathering camps – however unlikely they may be. The paleontological survey should also be expanded to include a number of cuts or bores in areas of potential fossil bearing strata. If access to even just the development footprint of the acreage is so limited **on foot**, one can not even begin to imagine the magnitude of grading that the Canyon Hills Project will require and the immense impact this grandiose operation will have in this otherwise environmental island of nature encircled by the City of Los Angeles.

While perhaps not listed on any official historic register, the Cross of San Ysidro has been of great historic significance to the residents of the Sunland-Tujunga Valley. The Cross was named in honor of San Ysidro, the Patron Saint of Little Homes, which held great significance to the early inhabitants of Tujunga known as the Little Landers. (Sunland and Tujunga from Village to City, Marlene A. Hitt, Pgs 111-113). While itself not located directly on Canyon Hills property, the original trail walked annually since 1923 for the Easter Sunrise Service does cross the property. Many people today still walk this trail for this annual event and fear that Canyon Hills may eventually block this original access. The Cross, being on adjacent property, also should classify as Cumulative Impact of a historical resource.

While noted mitigation measures for cultural resources are standard and the best one can expect once grading has commenced, it is obvious that by the time an unearthed resource is recognized, the damage done to the site by the large earth-moving equipment would be irreparable. It is for this reason that the inadequacy of this cultural survey is unacceptable.



December 21, 2003

Maya Zaitzevsky, Project Coordinator
City of Los Angeles Dept. of City Planning
200 North Spring Street, Room 763
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Re: Canyon Hills Project
ENV-2002-2481-EIR
SCH No. 2002091018
October 2003

Ms. Zaitzevsky,

We find the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") highly misleading in its impact analysis of the Canyon Hills Project with respect to the issue of overcrowding of the school system.

Firstly, we feel that the estimate of school-age children that will come with the Canyon Hills Project at full residential capacity to be woefully underestimated. Additionally, conversations with PTA leaders of neighborhood schools lead us to believe that the present over/under school capacity numbers quoted in Table IV.J-3 of the DEIR to be highly questionable. Further, the DEIR cumulative analysis dealt with anticipated effects of the Canyon Hills Project alone. A true cumulative impact analysis relative to increased school-age population is **not** limited to the entries of "Related Projects" as listed in Table II-3 of the DEIR which concentrates on urban commercial projects located primarily on Foothill Blvd which include such things as a fast-food restaurant and gas station, but on an analysis of the cumulative effect of a radius of all communities impacting a given school's population. That would include the entire radius of cumulative impact surrounding eg John H. Francis Polytechnic High School, Verdugo Hills High School, etc. That radius of impact would include the community of Shadow Hills. I am not familiar with the entire impact radius of these schools, but I can speak for the small portion of the impact radius that is Shadow Hills. A 15-unit single family home development recently fully sold out. A 57-unit single-family home development is under active construction and has already sold a number of its units. A 21-unit single-family home development, fully approved, will soon begin construction. A 14-unit single-family home development, not yet applied for, but imminently coming. A number of additional 1 to 4 unit single-family homes under construction throughout the community. This speaks for the impact of Shadow Hills alone. What further developments are under active construction throughout the impact radius that should be included in this School-Impact Cumulative Analysis of the DEIR?

Following is a response to a totally different subject – that of the Equestrian Park. The DEIR leaves much to the imagination rather than effective planning. The DEIR Project Description III-4 states that “It is anticipated that the City’s Department of Recreation and Parks or a non-profit organization would operate the Equestrian Park.” There is no evidence of any formal conversations with or negotiations with either of the above to assure that this will come to pass. In the absence of such outside support, the DEIR presents no alternatives to assure the construction of and maintenance of the Park.

Further, there is a serious oversight in the design of the Park. The Verdugos are much enjoyed and used by equestrians. Weekend rides are often a group activity. Parking capacity for only two horse trailers in a Public Equestrian Park is markedly inadequate. They do not easily stack one atop the other.



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

December 22, 2003

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

Ms. Zaitzevsky,

We commend Canyon Hills for accepting among its traffic mitigation measures the funding of the design and installation of a much-needed signalization system at the proposed WB I-210 ramp/La Tuna Canyon Rd./Development A access intersection – this being noted in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the “DEIR”). The anticipated marked increase in traffic volume from the Canyon Hills Project, which we feel is quite understated in the DEIR, will most certainly effect not only La Tuna Canyon Rd but also the EB/WB on-ramps of the I-210. Therefore, the installation of a metering system at the head of the on-ramps, to be in operation at least during the AM peak hours, should be seriously considered.

Aside from questioning the projections made by Linscott, Law and Greenspan as to the anticipated LOS at the I-210/La Tuna Canyon Rd. on-ramp/off-ramp figures, some information in Table 6 of the Traffic Impact Survey in the Technical Appendices are difficult to follow: What is the reason behind entry #3, I-210 EB ramps and La Tuna Canyon Rd in addition to entry #9, I-210 EB on-ramp and La Tuna Canyon Rd.?

A feature that also fails to ease the burden of increased traffic volume is the lack of reasonably accessible public transportation. The nearest bus route is 2 miles away – and that is measured from the Canyon Hills Entry Point which is a further ½ mile distant to the nearest home. I refer you 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 1-2 of the Community Plan states “To locate new housing in a manner which reduces vehicular trips and which increases accessibility to services and facilities.” Policies to obtain this Objective includes 1-2.1 “Locate higher residential densities near commercial centers and major bus routes where public service facilities, utilities and topography will accommodate this development.” The recommended Program to achieve

approved as proposed, in the interest of safety, we will have to accept major mitigation measures that will markedly impact the current rural atmosphere of the Canyon.)

Again, information gleaned from data presented in Table 9 of the Traffic Analysis, DEIR Appendices:

Average annual ADT between 1900 to 2000 = 11, 510 (*)

Average annual # of accidents between 1900 to 2000 = 18.4 (**)

Current ADT = 13,081 (2002) (Page 43, Traffic Analysis, DEIR Appendices) (***)

$11,510 (*) / 13,081 (***) = 18.4 (**) / X$ $X = \#$ anticipated accidents for 2002
 $X = 20.9$

Canyon Hills forecasts an additional ADT of 2,694:

$13,081$ (ADT in 2002) + $2,694$ (Canyon Hills forecasted ADT) = $15,775$ (Total ADT)

$13,081$ (ADT in 2002) / $15,775$ (Total ADT) = 20.9 (Anticipated # accidents in 2002) / Y

$Y = 25.2$ (Anticipated # accidents post- construction of Canyon Hills)

20.9 (Anticipated # accidents in 2002) / 25.2 (Anticipated # accidents w/ Canyon Hills) = 100% (2002) / Z

$Z = 120.6\%$ **(a 20.6% anticipated increase in the annual accident rate on La Tuna Canyon Rd. as an impact of the Canyon Hills Project as proposed.)**

By reason of this anticipated increase in accident rate due to construction of Canyon Hills as proposed, any utility poles to be installed at any point along La Tuna Canyon Rd that is in any way related to the needs of the Canyon Hills Project should be placed underground at the expense of Canyon Hills since collision with a fixed object such as a utility pole would increase the severity of injuries as a result of that collision.

Mitigation for improving La Tuna Canyon Rd to minimize the potential accident rate increase must take into account two ½ mile segments of the otherwise 2-lane per direction secondary roadway which narrows to a single lane per direction, located at a point in the roadway where curvatures are at their tightest around the 8300 to 9000 block. These points, located west of the Project Site about 0.5 mi and 1.5 mi west of the EB I-210/La Tuna Canyon Rd intersection respectively, are currently already known points of congestion and points of numerous accidents and would be notably effected by the increased traffic volume of the Canyon Hills Project along with that of any cumulative projects within the Canyon itself. La Tuna Canyon Rd is a designated Secondary Hwy as per the City's General Plan. However, the roadway currently consists of this variable width roadway as described above generally with unimproved sidewalk. Standard Plan S-470-0, effective Nov. 10, 1999 dictates that the standard cross-section for a secondary highway is 35 ft half-roadway on a 45-ft half right-of-way. The Canyon Hills developer should firstly dedicate and widen, at his expense, the entire project frontage up to the standard required by the General Plan possibly

This Policy is "The Plan designates lands for higher residential densities within and adjacent to transit-convenient locations." Canyon Hills has elected to ignore the recommendations for residential densities as proposed in the Community Plan, therefore Canyon Hills should take it upon itself to undergo negotiations with the MTA to bring a reasonably accessible bus stop to Canyon Hills residents.

Additionally, in support of the State's Congestion Relief efforts, a suitable Park and Ride lot might be designated near the Canyon Hills Project/I-210 Fwy intersection.

I question the thoroughness of the 24-hour machine traffic count on La Tuna Canyon Road, which was taken "west of the I-210 interchange", as presented in the Traffic Analysis of the DEIR Appendices (Page 29). The exact location "west" was not clearly defined. And what about any counts of La Tuna Canyon Road traffic east of the I-210 interchange, especially considering that the current LOS of the La Tuna Canyon Rd/Tujunga Canyon Blvd is running at an LOS F at AM peak hours and LOS E at peak PM hours. Also, should there not also be an LOS study of the intersection of La Tuna Canyon Rd/Sunland Blvd to help evaluate the potential impact of Canyon Hills on traffic that may be attempting to use this route as an access to the I-5. Mitigation Measures lists the following anticipated changes in LOS as "incremental but not significant" therefore requiring no mitigation (Table 6): 1.) I-210 EB/Sunland Blvd, AM peak LOS D to LOS E w/mitigation 2.) I-210 EB/Sunland Blvd, PM peak LOS C to LOS E w/mitigation 3.) I-210 WB/Sunland Blvd, AM peak LOS D to LOS F w/mitigation 4.) I-210 WB/Sunland Blvd PM peak LOS B to LOS C w/mitigation 5.) Tujunga Canyon Blvd/Foothill Blvd AM peak LOS D to LOS E w/mitigation and 6.) Tujunga Canyon Blvd/Foothill Blvd PM peak LOS D to LOS E w/mitigation. I do not find these increases in LOS "incremental" and suggest that Canyon Hills seriously consider the cumulative impact of their project, as proposed, on these LOS'. This cumulative impact evaluation should also consider the effect of the development under active construction in the western portion of the La Tuna Canyon as well as any other projected or imminently potential further developments within the Canyon itself. The low traffic volume projects which are primarily such things as a fast-food restaurant, a gas station or a church expansion located along Foothill Blvd (Page 32, Traffic Analysis, DEIR Appendices) taken under consideration for the cumulative impact evaluation in the DEIR will not directly effect intersections more intimately associated with the Canyon.

Information gleaned from data presented in Table 9 of the Traffic Analysis, DEIR Appendices:

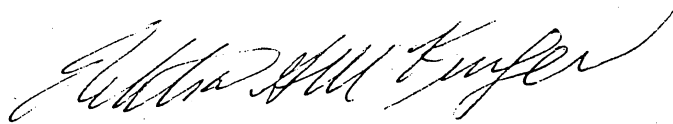
Average Annual Increase in ADT between 1900 to 2000 = 223
Highest Annual Increase in ADT (2000) = 237

And the Canyon Hills Project is forecasted to generate **2,694 ADT all by itself!**

Can you imagine what this might do to the accident statistics if no major mitigation measures are undertaken along La Tuna Canyon Rd. (Unfortunately, if the Project is

replacing the sidewalk with a 12 ft wide dedicated multi-use trail which would be, at least, somewhat consistent with the character of the Canyon. Also left-turn channelization should be considered at Dev A and Dev B ingress/egress sites. Further, the developer should be responsible for his fair-share percentage of the cost of La Tuna Canyon Rd improvements at the sites of road narrowing west of the Project Site. However, according to the NOP response letter submitted by Paul/Virginia Sloane, these narrowings are located in a portion of the roadway that is squeezed between a flood-control channel on one side and residential property on the other leaving no space available to widen or re-engineer the road at these critical locations. If true, I must ask whether La Tuna Canyon Road could ever accommodate the increased traffic volume of a 280-home Canyon Hills Project. Can this truly be reasonably mitigated?

Also, given the LOS of La Tuna Canyon Rd/Tujunga Canyon Blvd and the LOS of Tujunga Canyon Blvd/Foothill Blvd, there should be some very serious consideration of widening Tujunga Canyon Blvd from a 1-lane to 2-lane road to accommodate increased traffic from the Canyon and to provide room for passenger vehicles to side-line allowing for safe passage of emergency vehicles certain to be needed at a notably increased rate with the completion of Canyon Hills as proposed. Again, the Canyon Hills developer should be expected to pay a fair-share percentage of this improvement.



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

December 26, 2003

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

Ms. Zaitzevsky,

The equestrian community is voicing some concern over the potential need for blasting procedures during the grading process of the Canyon Hills Project as per the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") IV-A-32.

Horses are highly sensitive to sudden loud noises and even the most insignificant level of ground vibrations, therefore the developers should make every attempt to provide advance notification to the ENTIRE equestrian community at least 48 hours prior to the procedure. We understand that it would be totally unfeasible for Canyon Hills to make personal contact with each and every person potentially effected by these procedures, however we do recommend that they utilize contact with local community organizations through which information can be passed on to their members and to the community at large through their various E-mail trees and Web-sites. Information passes through the community quite thoroughly by this method so that person without computer access will certainly get the information by word-of-mouth. A number of organizations that would be helpful to contact would include the Sunland-Tujunga Neighborhood Council, the Foothill-Trails District Neighborhood Council, ETI-Corral 20, La Tuna Canyon's Homeowner's Association and Shadow Hills Property Owners Association. Such notification would provide warning to equestrians to avoid riding on days of anticipated blasting. A spooked horse could result in serious injury to himself and a thrown rider.

Following are responses to mitigation measures noted on pages IV-A-33 to IV-A-36 of the Geology and Soils section of the DEIR.

I quote from pg IV-A-33: "significant impacts to geology and soils would occur with implementation of the proposed project due to the potential for rock fall, landslides, and cut slopes." Mitigation measure A-1 states: "The project developer shall incorporate setback

zones from potential rock fall areas (as shown in Figure IV.A-1). In areas where proposed structures may encroach within the setback area, rock fall containment devices shall be incorporated into the design . Examples of such devices include debris fences or walls, rock bolting and netting, or rock fall containment basins.” First, **no** structure should be allowed to encroach in set-back zones of rock fall areas. With the possible exception of rock fall containment basins, all suggested containment devices are flawed in concept. Debris fences are unsightly. Debris walls may or may not be unsightly depending on their design, however in no way are they in keeping with any attempt to retain as much of the natural viewshed of the area as possible. Rock-bolting has been known to dislodge under stress bringing rock with it and netting will rust and break down overtime thus, in the long-term, leaving rock fall areas a danger to property and person.

Response to Mitigation A-3 (DEIR IV-A-33/34): All roadways and lots should avoid landslide areas. No amount of stabilization or shear-key construction can fully assure against slope instabilities and it’s subsequent potential for damage and injury.

Under the “Cumulative Impacts” section (DEIR IV-A-35): A reference was made to the 13 related projects that the DEIR took under consideration. It was here claimed to be referenced in “Figure II-1”. This statement is erroneous. Figure II-1 is a mapping of “Project Location and Regional Vicinity”. It is actually Table II-3 and Figure II-2 that provide the listing and mapping of the locations of related projects respectively.

Proceeding to the chapter on Air Quality (DEIR IV-B):

Firstly, it becomes difficult to follow the anticipated effects of the Canyon Hills Project as Table IV-B-1, a listing of Ambient Air Quality Standards, are in units of ppm and ug/mmm whereas Emissions Thresholds of Significance for the Project (DEIR Table IV-B-3) and Operational Emissions (Table IV-B-6) are in units of pounds/day. I am sure there is a conversion factor from one unit to the other, but why make it so difficult for the average community resident, who must reasonably understand these tabulated figures and their respective emission-load increase information as forecasted for the Canyon Hills Project, to follow these tabulated figures? Please tabulate these emission factors in the same units.

I also question why a monitoring station for CO concentrations at the intersection of Tujunga Canyon Blvd/Foothill Blvd (Table IV-B-7) would be expected to provide a fair evaluation of the forecasted impact of increased CO emissions as a result of the construction of the Canyon Hills Project. A more honest impact study should be performed at the I-210 Westbound ramps/La Tuna Canyon Rd/Development A Access intersection. This due not only to the anticipated notable increase in traffic volume at this location, but also due to the signalization system that this traffic will require which will lead to a marked concentrated emission rate especially at peak Am and PM hours as slow-moving vehicles from the 211 homes of Development A queue at this single ingress/egress point.

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



December 27, 2003

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200 North Spring Street, Room 763
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Re: Canyon Hills Project
ENV-2002-2481—EIR
SCH No. 2002091018
October 2003

Ms. Zaitzevsky,

We would like to express a difference of opinion relative to the “clustering concept” as interpreted by Whitebird, Inc. as well as some missing and perhaps incorrect information presented in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the “DEIR”) which, had it been made available, would have greatly helped the average resident follow Whitebird’s explanations for their proposed zone change requests.

A missing bit of information includes a map of the break-down of the proposed zone changes. The DEIR does provide maps of Land Use Designations both Current and Proposed (DEIR Figure IV-G-1 and Figure IV-G-6) and a Map of Current Zone Designations (DEIR Figure IV-G-4). It does not provide a map of Proposed Zone Designations throughout the Canyon Hills Project Site. The DEIR Figure IV-G-3 does provide a mapping of the prominent ridgelines of the entire San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (heretofore to be referred to as the “Scenic Preservation Plan”), however fails to provide an enlarged pull-out map, or map of any kind, illustrating how these ridgelines lie relative to the Canyon Hills Project Site and it’s immediately adjacent lands only. There is some serious question as to a number of ridgeline endpoints that appear at the very point where these ridgelines meet the Canyon Hills Project Site border as seen in full-size maps available for examination at the Planning Department.

A confusing or erroneous statement noted on page DEIR IV-G-16 makes reference to 237 acres **within** Development Areas. We are given to understand that there are 142 acres associated with Development A and 52 acres associated with Development B – this adds up to 194 total acres within Development Areas, not 237.

I proceed now to our differing opinions as to the "clustering concept" as interpreted by Whitebird Inc. Canyon Hills is currently zoned A1 or A1-K in its entirety (DEIR Figure IV-G-4). Footnote 7 of the Community Plan emphasizes that it is only the total density that would otherwise be allowed over the entire ownership that may be clustered. If the existing zoning, the Hillside Ordinance restrictions and the Slope Density Formula were taken into consideration, the total number of units that Canyon Hills may be allotted would be 87 units, not 280. These 87 units could easily be clustered into RA zones which would make the entire Canyon Hills Project an equestrian-oriented project which would be in keeping with the Objectives of the Sunland – Tujunga – Lake View Terrace – Shadow Hills – East La Tuna Canyon Community Plan (heretofore to be referred to as the "Community Plan"). I reference Objective 1-8 of the Community Plan: "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." The DEIR made reference to Footnote 7 of the Community Plan (DEIR IV-G-18) to point out that the proposed density of the Canyon Hills Site Plan does not exceed the maximum density permitted under the proposed Low Residential land use designation quoted in Footnote 7. While indeed Footnote 7 does state: "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. Density clusters shall not **exceed** that permitted in the Low Density housing category for areas that are not in "K" Districts, and shall not **exceed** that permitted in the Very Low I category for areas that are within a "K" District." Indeed, the majority of Canyon Hills is not within a "K" District, however being located in a highly equestrian oriented canyon neighborhood, Canyon Hills should seriously consider clustering at equestrian-size lots. Footnote 7 does not lock you into the Low Density housing category, it merely restricts you from **exceeding** the zoning of Low Density housing. This would allow Canyon Hills to seriously consider clustering into lot sizes of an RA zone ie a minimum of 17,500 sq ft/lot equestrian lots, a very viable option with approximately 2.6 houses per net acre as opposed to the 9 quoted in the DEIR IV-G-18 when RA zoning was not taken into consideration. Canyon Hills would actually have two options given the 192 acres proposed for development. One would be to reduce the proposed development footprint for RA zoned lots or a second would be to increase the lot sizes for the 87 units to a higher zoning to fill the proposed footprint. Additionally, one should keep in mind that, as per the Community Plan, the area of Canyon Hills Development A is already foreseen to become zoned within the Very Low 1 density category (RE40 or RA). It is the intent of the Community Plan that the entitlements granted be of the zone designations set forth in the Plan unless accompanied by a concurrent Plan amendment.

We obviously also differ somewhat in our opinion relative to the DEIR's interpretation of Land Use Compatibility. (IV-G-15 and IV-G-19, 1-1.2 & 1-3.1). We assume that the DEIR's reference to "existing homes adjacent to Development A" are references to the North and Northeast along eg Verdugo Crestline Area. The lots to the North and Northeast were subdivided many years ago and initially served as summer homes to the "city-folk" – they were never designed to be full-time residences and, as such, were never subdivided to