

serve as a full-time residence. It is the equestrian-oriented lots to the west in the canyon that should be taken into consideration when discussing neighborhood land use compatibility and Canyon Hills should be comparing it's Site Plans from the functional perspective of the western canyon neighborhood which has made every effort to retain equestrian lot size zoning.

A handwritten signature in black ink, appearing to read 'Elektra G.M. Kruger', written in a cursive style.

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

December 28, 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 differ somewhat in our opinions with the Canyon Hills Project developers in terms of their claims of consistency with the Objectives and Goals of the Sunland – Tujunga – Lake View Terrace – Shadow Hills – East La Tuna Canyon Community Plan (heretofore to be referred to as the “Community Plan”). We differ in opinion with many of the items listed in Table IV-G-4 of the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the “DEIR”), however most have been addressed in prior response letters submitted by the Shadow Hills Property Owners Association (heretofore to be referred to as “SHPOA”). We wish to address here only two, that of entry numbers 14-2.3 and 14-2.4. The Community Plan Policy statement of entry number 14-2.3 states: “Encourage the development of equestrian trails through residential areas appropriate for horsekeeping.” The Community Plan Policy entry number 14-2.4 includes among its statement: “New trails should be expanded where appropriate and feasible.” The Consistency Discussion of the DEIR responds to statement number 14- 2.3 stating that neither of the Canyon Hills Project Development Areas are appropriate for horsekeeping due to the steep topography and no part of the DEIR’s “Consistency Discussion” for entry number 14-2.4 addresses potential expansion of new trail systems. We appreciate that the developers may not understand the capabilities of the horse and rider or nature of the trails utilized in the Verdugo Mountain region, therefore I would strongly recommend that the developer meet with representatives of organizations holding a strong interest in the overall future development of the Canyon Hills Project. This would include such organizations as the Foothill Trails District Neighborhood Council, ETI Corral 20 and the Trails Committee of SHPOA.

A very different subject: I remind the Los Angeles Planning Department and the Canyon Hills Project Developer of the tragic incident in December 2003 in which extensive mudslides were responsible for a great deal of damage to property and worse to loss of life in

the Devore Waterman Canyon Area near San Bernardino. This resulted from heavy rains following recent wildfires which had engulfed the hillsides. La Tuna Canyon is highly susceptible to wind-driven wildfires and will be all the more so with the increased population of the Canyon Hills Projects' proposed 280 homes. A heavy rain following a canyon fire will surely saturate the bare soil resulting in liquefaction. Absolutely NO lot, home or roadway should be constructed near a known rock-fall area or known landslide area and no cut or fill should be greater than 10 feet.

A further very different subject: This in reference to Consistency Discussion Section 7A.2 page IV-G-25. I quote: "No grading or removal of native vegetation shall occur within any Prominent Ridgeline Protection Area(s), except as necessary to meet fire safety and brush clearance requirements, to develop recreational trails, or for landscaping associated with residential lots." We believe that no grading should be permitted more than 10 feet beyond a residential footpad. While there are structural restrictions relative to Prominent Ridgeline Protection Areas, lot lines may extend into these said areas. It is therefore very important to restrict grading and removal of native vegetation for residential landscaping which may disrupt the viewshed of the ridgeline.

I am confused by the wording of the Consistency Discussion Section 7A (DEIR IV-G-25). I quote: "As reflected in the site plan for the proposed project, none of the proposed homes would be located in whole or in part in a Prominent Ridgeline Protection Area and no proposed home located within five feet of a Prominent Ridgeline Protection Area would exceed 36 feet in height." If none of the homes for the proposed project are located even "in part" in the Prominent Ridgeline Protection Area, then how could there be an option for a home located within 5 feet of the Protection Area with a height limit of 36 feet. This would imply that these homes would be "in part" inside a Ridgeline Protection Area. If I am misreading this paragraph, I am sure I am not alone. I recommend that this paragraph of the DEIR be more clearly written.

A response to the Land Use Mitigation Measure noted on page IV-G-28. I quote: "The proposed project would not physically divide an established community or conflict with any applicable land use plan, policy regulation, habitat conservation plan or natural community conservation plan." The proposed site plan would most definitely conflict with "any applicable land use plan", that being the Community Plan which projects an eventual development to Very Low Residential I density for the Development A Area and Minimal density for the Development B Area. Thus, this Mitigation Measure, as stated, is in error.

Response to the DEIR's Project Growth calculations on page IV-H-5. While the calculations were based correctly on Community Plan housing density projections, no consideration was given to the lot size effect of hillside ordinance restrictions and the slope density formula. While indeed the unit allotment would be greater than the 87 we used in arguments in previous letters which were based on the current A1 zoning, the allotted units would still be much less than the 359 calculated here. Please repeat these calculations taking the hillside ordinance and slope density formula into consideration.

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



December 29, 2003

Maya Zaitzevsky, Project Coordinator
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,

We have some serious reservations about a proposed design feature for the waste-water connection system for the Canyon Hills Project as described in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") Page IV-L-10. Some of the sewer lines are planned to be suspended under some proposed bridges. We ask simply whether this concept has ever been utilized elsewhere and done so with no negative effects such as odor or leakage.

Different subject – natural gas infrastructure connections as addressed on page DEIR IV-K-7. We feel that the project developer should be held financially responsible not only for all necessary connection costs, but any and all expansion costs required by the Canyon Hills Project.

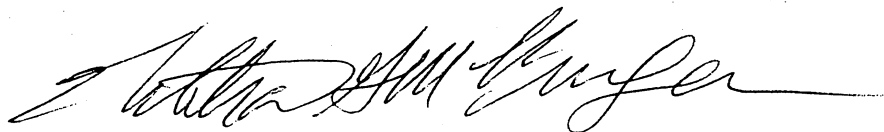
Different subject – Level of Significance after Mitigation of Aesthetics on Page DEIR IV-N-41. I quote: "Project impacts with respect to scenic vistas, scenic resources, and existing visual character would remain significant following implementation of the recommended mitigation measures." If destruction of scenic visual features cannot be mitigated, the project should not be approved as designed! Perhaps a reduction in the number of home units along with a marked reduction in grading would improve development aesthetics as seen from the I-210 and La Tuna Canyon Road which are the designated Scenic Corridors of the La Tuna Canyon. This means a reduction in the grading that cuts whole ridgelines into flattened building pads, a reduction in the grading that straightens to horizontal whole current skyline irregularities, maintaining as much of the natural landform terrain as possible and creating a site plan that removes home units from a silhouetting appearance to one of a "tucked-in" appearance throughout the project. This approach will not take away from the general rural ambiance of the Canyon.

Different Subject – The DEIR appears to consider the concept of “balanced grading onsite” a marvel of engineering ingenuity. Yes, it is nice to think that no dirt will have to be disposed of somewhere off-site, however when considering that the proposed project intends to grade 4,600,000 cu yds of dirt – cutting off whole mountain tops, filling in whole canyons, destroying natural landform terrain, destroying natural water-collection pathways with their limited Riparian Habitat upon which wildlife depends for forage and nesting - my amazement at this “marvel of engineering ingenuity” fades fast.

Different subject – Response to Alternative B presented in the DEIR beginning with Page VI-14. It is frightening enough to consider the traffic, the horrid picture of an essentially impossible complete evacuation in the event of a fire, etc. with vehicles from a full 280 homes as opposed to a mere (?) 211 of Development A of the proposed project entering and exiting the single ingress/egress of Development A. In all honesty, in an emergency situation, one does not think clearly enough to consider a secondary emergency exit that is not a regular daily ingress/egress road. All these vehicles are exiting the single access that emergency vehicles must use to enter. Alternative B, therefore, is absolutely and totally unacceptable.

I quote from the DEIR Page VI-16 “Similar to the proposed project, it is anticipated that, without mitigation, this alternative (ie alternative B) could result in significant impacts in Development Area A due to the potential for rock fall, landslides and instability of cut slopes.” We have seen over and over again that potential rock falls, landslides and unstable cuts & fills **CANNOT BE MITIGATED!** How many times have we seen tragedies of loss of life and/or property as a result of heavy rains, ground vibrations from earthquakes – even ones centered many miles away and something as simple as a response to day-to-day natural stresses. **NO** home should be placed near any known rock fall area or landslide area whether considering Alternative B or the Proposed Project. And no cut or fill should be greater than 10 ft. Even something this minor could result in a real mess, but should not result in total loss of property and should not result in injury.

Different subject – A question about the estimated ADT of the Equestrian Park. The DEIR lists the estimated ADT as 14 (Pg VI-21). Where are these 7 horse trailers supposed to park? One atop the other in the two proposed available parking spaces? The Park is intended to be available to the public. Whitebird Inc. must realize that they are constructing a development in the heart of an equestrian corner of the City – three whole equestrian communities, all of which ride the Verdugos from time to time. Aside from, more than likely being underestimated, the available parking spaces will not adequately serve the ADT of the Equestrian Park.



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

December 26, 2003

TO:
Ms. Maya Zaitzevsky, Project Coordinator
City of Los Angeles Department of City Planning
200 North Spring Street, Room 763
Los Angeles, CA 90012

RE: Comments to Canyon Hills Project D.E.I.R.
ENV-2002-2481-EIR
REF: SCH 2002091018

BIOLOGICAL RESOURCES-WILDLIFE MOVEMENT

1. On page IV.D-129, the author states "The rugged landscape and dense vegetation generally restrict wildlife movement by larger animals, such as Coyote and Mule Deer, to existing wildlife trails along ridgelines, roads and firebreaks (Emphasis added). This is categorically false. During the fourteen (14) years that I have lived in the area, I have personally hiked the three (3) riparian habitats located within Development Area A, on more than one (1) occasion. If the author had done this as well, it would have been obvious, as it was to me, that numerous wildlife trails come down to the riparian habitats from the ridgeline area above. They occur in such frequency as to create a "tentacled web" of travel by an assortment of wildlife species, as evidenced by animal prints and scat in those areas. It is entirely misleading for the author to speculate on the true extent of local animal movement if they have not extensively examined the areas noted.
2. On page IV.D-131, while summarizing the "fragmented character" and "tenuous link" for regional movement of wildlife, the author claims that "It is important to note that, even if animals move out of the San Gabriel Mountains via the Tujunga Wash, they would not necessarily move toward the Verdugo Mountains..." This would appear to be incorrect by virtue of a sighting this year of a Mountain Lion in the ravine between Inspiration Way and Reverie Road, by a resident. This also speaks of the very real possibility of a community of Mountain Lions living within the Verdugo Mountains.
3. On page IV.D-141, the author states "It is difficult to determine the exact number of Coyotes; however, based upon documented home range sites for Coyotes, it is expected that up to five (5) Coyotes would use the project site and Duke property at any given time." I would invite the author to visit the adjacent residential community in the evening hours, when two (2) or more **PACKS** of Coyotes yell to one another from the two (2) blue line stream areas directly on the project site. Additionally, a total of four (4) Coyotes were personally viewed on our property during the week of November 10, 2003, and again during the week of November 24, 2003. It is difficult for me to envision that 80% of the author's estimated quantity of Coyotes just happened to be present on our property at that time.

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RE: Comments to Canyon Hills Project D.E.I.R.
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cont'd

4. In summarizing the regional and local movement of wildlife as they would be affected by the proposed development, the author states, in effect, that there is no impact and that mitigation is unnecessary. Then, under "cumulative impacts", the author states that "only the Duke Project (related project no. 7) is sufficiently close to the project site to potentially and cumulatively interfere with movement of wildlife species" (Emphasis added). This is a contradictory and often repeated example of the author's "double speak" relative to the wildlife movement issue. The incremental loss of additional wildlife habitat in the Verdugo Mountains would continue if this proposed development would be approved. This point is conveniently underplayed and dismissed as unimportant.

ENVIRONMENTAL IMPACT ANALYSIS - LAND USE

1. On page IV.G-6, in describing the legislative status of the Draft San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, the author accurately states that "Since the Specific Plan has not been formally adopted yet, it currently has no legal force or effect and does not have to be considered in this Draft E.I.R. However, given the significant public interest and community involvement in the Draft Specific Plan, it's principal components are discussed below for informational purposes." It is encouraging to see that the Developer has included discussion on it's main points in the D.E.I.R., and is considered politically correct in doing so, but they have also specifically excluded all relevant dialog relative to how their proposed development might be affected by the State-Recognized Scenic Corridor status of the 210 Freeway and La Tuna Canyon Highway. The final E.I.R. should include all dialog relevant to it's restrictions.
2. On page IV.G-28 (and preceding pages as applies), under "Cumulative Impacts", the author states that "The Duke Project is to be considered to be compatible with the proposed project and the existing residential uses Northeast of the project site." It is conveniently not discussed that the original request for the Duke Project was to build a total of 41 homes by virtue of its request to change the existing zoning and strike footnotes from the Community Plan. These requests were summarily rejected by the City in their final approval of the 10 homes for the Duke Project. It is inaccurate and misleading for the author to draw comparisons with projects that have not changed existing land use designations for their implementation, as this project proposes doing.

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RE: Comments to Canyon Hills Project D.E.I.R.
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3. In reference to the author's statement on page IV.G-29 that "the proposed project's land use impacts would be less than significant", it truly boggles the mind that this statement is made when, in point of fact, the proposed project goes against the grain of the spirit of all existing land use designations. There is a consistency in all statutes, guidelines and ordinances that specifically intend to prevent developments, such as this, from being approved. To quote appropriate jurisdictional guidelines:
- (a) **Statutory Regulations of California State Policy Re: Environment, Public Resources Code no. 21001:**
"Additional legislative intent to take all action necessary to provide the people of this State with clear air and water, enjoyment of aesthetic, natural and scenic and historic environmental qualities, and freedom from excessive noise,"
and
"Insure the long term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian shall be the guiding criterion in public decisions."
- (b) **CEQA, Section 15021 (a):**
"CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible and (1) in regulating public and private activities, Agencies are required to give major consideration to preventing environmental damage." (Emphasis added)

ENVIRONMENTAL IMPACT ANALYSIS - POPULATION AND HOUSING

1. On page IV.H-4, the author states that approximately 693 acres (i.e. 78% per cent) will be designated as "permanent open space." By what legal means will this process take place? How can the Community be assured that this will occur? I suggest that the Developer give the land as a grant to the Santa Monica Mountains Conservancy if they truly are interested in appeasing a distrusting public.

ENVIRONMENTAL IMPACT ANALYSIS - TRANSPORTATION/TRAFFIC

1. On page IV.I-15/16, in describing the emergency access to Development Area A, it is mentioned that Hillhaven Avenue, Inspiration Way, and Verdugo Crestline Drive all have a "40 foot wide dedicated public street" width. This is entirely misleading considering the actual street width. There are portions of these streets where the actual

RE: Comments to Canyon Hills Project D.E.I.R.
ENV-2002-2481-EIR
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and functional travel width narrows to less than 15 feet! In an emergency situation, when traffic from fleeing vehicles on the site would be opposed by emergency vehicles heading towards the project site, this would create a situation where traffic would be impeded in both directions. This would create an extremely dangerous situation for all citizens, and this attempt at providing for a required secondary access from Development Area A is totally inadequate. Additionally, the author states that the emergency access would be controlled, in that it would not be used by the project's residents on a day to day basis. Historically, these types of access controls have been overcome by residents looking for a "quick way into town." Reference the Crystal View Development to the East of the project site for just the closest example of how good intentions gave way to public pressure. Just who would be responsible for repairing any damaged access control elements when (not if) they are overcome by the residents? When this occurs, the entire provision of "emergency access only" is relegated to a very dangerous joke.

ENVIRONMENTAL IMPACT ANALYSIS - PUBLIC SERVICES/FIRE

1. On page IV.J-4, in discussing fire hazards and specifically the fire on August 5, 1999, it is stated that "The LAFD's records are not conclusive regarding the precise location of the fire." As a resident who lived through the nightmare of this fire, I and many other residents can confirm that this fire originated along La Tuna Canyon Road, and was an arson fire. The prevailing winds, at the time of this fire, pushed the flames toward the Northwest, directly towards the proposed Development Area A. This was also not the only arson-induced fire in the immediate vicinity. With the likelihood of a similar fire in the future, all means of reasonable egress from the site would be eliminated. This is an unmitigatable danger for the residents of this community.

ENVIRONMENTAL IMPACT ANALYSIS - AESTHETICS

1. The author has gone to considerable depth in this section to describe how the project will ultimately "fit in" to the surrounding areas. One only has to look on page IV.N-41, under "Level of Significance After Mitigation", to understand the net result of the proposed development. In the author's own words, "Project impacts with respect to scenic vistas, scenic resources, and existing visual character would remain significant following implementation of the recommended mitigation measures (Emphasis added)." **THE BLIGHT THAT THE PROPOSED DEVELOPMENT WOULD HAVE RELATIVE TO THIS ISSUE SHOULD NOT BE ALLOWED TO HAPPEN.**

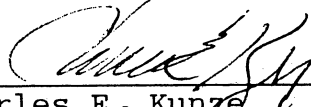
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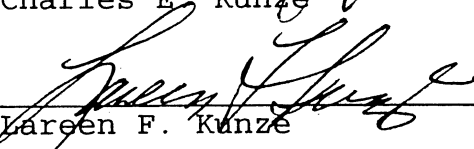
ADDITIONAL COMMENTS TO THE D.E.I.R.

1. Existing land use designations and other ordinances specifically restrict the allowable number of homes over the entire 887 acres to 87 homes. This Developer should be required to abide by the same restrictions as any other land owner also affected by them. Simply because a developer wants to increase their profits should not be a reason to entertain changes to land use designations. The proposed 280 homes exceeds the currently allowable number of homes by 193!!! What justification does the Developer give for this?? The actual reason is their interest in making more money. If the Developer wishes to donate 78% of the area's open space, the Community would welcome that with open arms. But by doing so, they should still only be able to construct as many homes as is currently allowed over the remaining 22% of land.

Respectfully submitted,



Charles E. Kunze



Lareen F. Kunze

Residents of:
9413 Reverie Road
Tujunga, CA 91042

Melinda A. Lirones
7032 Flora Morgan Trail
Tujunga, Ca. 91042

December 20, 2003

Los Angeles City Planning Department
Maya E. Zaitzevsky
200 North Spring Street
Los Angeles, Ca. 900112

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

Dear Ms. Zaitzevsky:

I have been a resident of this area since 1990 and we have owned property here since 1978. Our property is just north, across the mountain, from the proposed Canyon Hills Project. The main reason for loving this area is the magnificent mountain views and wildlife.

This project, in my opinion, would involve much grading, which is an obvious destruction of the natural terrain. There was an impact study of the wildlife which lasted 4 days. How can they possibly come to a definite conclusion after only 4 days! Our own observations of the coyotes (just one species) are that they move in-and-out of our area on a constant basis. Sometimes we observe them daily and hear them nightly for weeks at a time, and then they migrate to another area for a short time, before returning. Over the years, I have observed deer, skunks, raccoons, opossums, bobcats, and mountain lions, plus the many birds.

Also of major concern is the traffic and safety issue. This project is supposed to take 5 years to complete, and the traffic problems are supposed to be solved by putting a traffic light at La Tuna Canyon and the 210 Freeway. Who are they trying to convince?

Thank you for your consideration.



Melinda A. Lirones

Samuel S. Lirones
7032 Flora Morgan Trail
Tujunga, Ca. 91042

December 20, 2003

Los Angeles City Planning Department
Maya E. Zaitzevsky
200 North Spring Street
Los Angeles, Ca. 90012

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

Dear Ms. Zaitzevsky:

I have been a property owner in the mountains of Tujunga since 1978 and have been a resident since 1990. We love the natural scenic beauty and wildlife of this area.

I also own 1.7 acres of mountain and view property (2 lots) just a short distance from our home, which we built. We would like to build one single-story house on this property to eventually live in when we are no longer able to climb stairs. I am finding it nearly impossible (2 years of trying) to get a permit to begin this building process. The previous owners of this property, who happened to be developers, had plans to build four houses on these lots. I purchased them to decrease the number of homes in our area.

Why should a developer from another state be able to get a variance to build cluster 280 cluster homes and destroy this area's natural beauty and wildlife?

I think very strongly that the maximum amount of homes, even with a variance, should not exceed the total allowed in the previous (1987) scenic plan.

Thank you for your consideration.



Samuel S. Lirones
7032 Flora Morgan Trail
Tujunga, Ca. 91042

David Long
8015 Glenties Lane
Sunland, CA 91040
(818) 352-3727

Dec 20, 2003

Los Angeles City Planning Dept.
Maya E. Zaitzevsky
200 North Spring Street, Room 763
Los Angeles, CA 90012

Re: CANYON HILLS PROJECT
EIR Case no: ENV-2002-2481-EIR

Ref. No: SCH # 2002091018

Dear Ms. Zaitzevsky,

I am David Long, a resident of Sunland for 11 years. As an interested member of the community, I reviewed a copy of the Draft Environmental Impact Report (DEIR) for the proposed Canyon Hills Housing Project.

This DEIR is certainly a bulky document, but as I began to read it, I felt that much of it was "word padding" that could give it the appearance of being a comprehensive evaluation without it actually addressing many serious impacts this proposed development would have on our community **FOREVER. I urge the City to have the developer re-do this environmental impact study addressing the issues others and I may bring up. Additionally, I urge the City to allow time for community members to respond to this second DEIR so that further inadequacies in can be brought to light.** This project and its impact are **HUGE** and care must be taken to not overlook important consequences or rush through this process.

I feel the DEIR is inadequate in the areas of aesthetics, noise, light pollution, detrimental impact on habitat for wildlife, violation of the community plan, and understated impact of a highly concentrated development (whether acknowledged by the developer as such or not). I have decided to pick one area of the DEIR to comment upon in detail-Traffic Congestion. As a resident of Sunland, this is a subject I know.

There is no mention in the DEIR of potential impact to *existing neighborhoods* regarding traffic congestion resulting from the proposed connection of either Inspiration Way, Verdugo Crestline Drive, or especially, Woodward Avenue as a secondary emergency access for Development Area A of the project. **The impact is potentially devastating to the residential neighborhoods along the McGroarty Corridor and adjacent areas.**

The DEIR indicates that an existing road (Inspiration Way, Verdugo Crestline Drive, or Woodward Avenue) would be extended to the new development Area A to provide secondary emergency access for Area A. Open passage by residents and visitors would be restricted. How this restriction would occur is not even mentioned in the DEIR but it is presumed to be a locked gate. My wife attended a Neighborhood Council meeting and she said the Canyon Hills representative that spoke stated the gate would be locked with a key that only the firemen would have a key to.

Using a locked gate or other similar means to restrict access to emergency vehicles is potentially catastrophic because for fire and paramedic services, *seconds count*. **Wild fires or heart attacks do not wait while someone is fumbling with a padlock on a gate.** Or what if some young vandal stuffs bubble gum in the lock, forcing the fire dept. to backtrack and go all the way around, wasting precious minutes. These existing padlocked gates I see around the hillside areas are mostly used to control access to dirt fire roads. They probably work fine for occasional passage by forest service personnel, but to have such a gate as emergency access for a community the size of proposed Area A is a very inadequate solution.

The DEIR is inadequate in discussing the other important purpose of this secondary emergency access route and that is the evacuation of the residents of the new development because of fire, earthquake, landslide, etc. **The Fire department clearly requires this access route is usable by the residents to evacuate, but there is no mention of how the residents are to get through this locked gate.**2. What if the residents need to get out before the fire department can unlock the gate? Will each resident be given a key or a pair of industrial strength bolt cutters?

So if this proposed extension of Inspiration Way were to be built, and blocked by a locked gate, it is only a small step for the residents to then petition to have the access opened up and allow free flow of traffic. This is not wild conjecture; this is a real likely hood. All it takes is for one resident in the new development to suffer or possibly die because the fire dept. couldn't get to them in time. Then the residents of the new development would get into an