

uproar, or file a lawsuit and even the fire dept. would likely support opening the gate at that time.

Once the gate is opened and traffic unrestricted, it is easy to see that residents of the proposed development would begin to use the route as a shortcut to Sunland, rather than going around via La Tuna Canyon and up Tujunga Canyon Blvd. to Foothill. Such a shortcut would cut about 10 minutes from the drive, *and more during busy times*, and thus would be very attractive.

Additionally, the residents and businesses in Sunland around the Mt. Gleason Corridor would discover this same route as a shortcut to the 210 freeway, going up over the hill and through the proposed new residential area to enter or exit the 210 at La Tuna Canyon.

**Thus, this route that began as “emergency access only” could become an unplanned busy thoroughfare through residential areas for access to the 210 freeway by residents and businesses in the entire Mt. Gleason region of Sunland and Tujunga.** Nowhere in the DEIR is this mentioned. The DEIR does not describe anything about this gate other than the statement: “The access to this portion of the project site would be controlled so that it could only be utilized on an emergency basis (i.e., not available for day-to-day use by project residents or visitors.)” 1.

In the DEIR, Section VI Alternatives to the Proposed Project mentioned extending Woodward Avenue as a possible emergency access route. Although the developer less favored this option than either an extension of Inspiration Way or Verdugo Crestline Drive, it is still on the table as an alternative. As a resident living near Woodward, I know that on weekdays around 8:00am and 2:00pm, the traffic flow on Woodward Avenue between Day Street and Apperson slows to a crawl because of parents, school kids and school busses dropping off and picking up children at Apperson School. **Emergency vehicles would be slowed when attempting to travel that section of Woodward. Elementary school children that might be in the path of fast moving fire dept. vehicles would be endangered.** There is nothing in the DEIR about this.

In Summary:

- ◆ The DEIR does not specify exactly how traffic on Inspiration Way, or another emergency route is going to be restricted to emergency vehicles only, nor is there any indication in the report that the Fire Dept. or the LAPD has approved of this plan. A locked gate is not adequate for a community the size of the proposed Area A.

- ◆ **There is no indication in the DIER of how this vague traffic restriction is guaranteed to be in place FOREVER so that the emergency access road does not become a de facto freeway access route for Sunland and Tujunga in general.**
- ◆ The DEIR does not cover how the residents of Area A could self evacuate through the Inspiration Way gate if it somehow did not get unlocked during a fast moving emergency (such as a Santa Ana driven wild fire breaking out on La Tuna Canyon, landslide, etc.)
- ◆ The DEIR does not mention how the emergency vehicle route through the existing quiet neighborhoods leading up to Inspiration Way (or other emergency route) will adversely affect these quiet neighborhoods or how this emergency vehicle traffic through residential streets will affect the safety of residents and school children.
- ◆ The DEIR does not cover if there is adequate response time to Area A for Fire Dept. and Police who will need to travel at reduced speeds through the narrow residential streets leading up to the proposed emergency access route at Inspiration Way (or alternate) including time to gain access through a locked a gate or other means of restriction. Should the alternate plan of extending Woodward Avenue for emergency access be selected there is no study showing the impact of fast-moving emergency vehicles attempting to travel up Woodward during the two busy times each day the area is swarming with elementary school kids.
- ◆ There is no study on how such a thoroughfare would affect the migration of animals along the ridge above the proposed development. In my estimation, a busy road bisecting the whole mountain would drive the local coyotes and other wildlife down into both the proposed new residential neighborhoods of the development and the older neighborhoods on the Sunland side of the hill.
- ◆ Should the emergency access route be the alternative of Woodward Avenue, there is no study of how the grading would affect the existing neighborhoods, nor how McGroarty would be widened to allow for passage of emergency vehicles.

I urge the city to have this DEIR redone so that it is more complete, accurate, and correctly states the impact on the existing community. Also, I urge the city to allow an additional community comment period so that the impact of adding this many homes in such a concentrated area is fully assessed as to the consequences to our community.

Should this project be approved and then constructed, the developer will eventually leave with hundreds of millions of dollars and for DECADES we in the community will be left dealing with the problems overlooked or understated in this Draft Environmental Impact Report.

Sincerely,

David Long  
Sunland Resident

1. p. 15 Section IV. I Transportation and Traffic.
2. J.1-2 p. 9 Section IV.J.1 Public Services

cc: Councilperson Wendy Gruel

Biology Expert (Eaton Canyon)

Michael C. Long  
6128 No. Reno Ave.  
Temple City, California 91780

Comment Letter No. 172  
Attachment 172ss

November 16, 2003

**Comments on Canyon Hills Development DEIR  
Biological Sections**

The following comments are provided following the review of the biological portions of the Canyon Hills Draft EIR:

**Appendix G (Section 1 and 2) Biological Technical Report:**

**Sensitive Biological Resources, Pg. 2:**

The Orange-throated Whiptail (*Cnemidophorus hyperythrus beldingi*) is well out of range, has never been recorded in Los Angeles County, and should not be expected on the site. The Coastal Western Whiptail (*Cnemidophorus tigris multiscutatus*) would be the expected *Cnemidophorus* on site (as listed in Table, Pg. 16). Likewise, the "Northern Red-diamond Rattlesnake" (properly spelled Red Diamond, no hyphen) does not occur north of Orange County. These species and other reptiles and amphibians are mapped and described in the several standard references used by biological consultants throughout California, but not cited in the references in the DEIR. These are, at a minimum, Jennings, M.R. and M.P. Hayes 1994, Amphibian and Reptile Species of Special Concern in California, California Department of Fish and Game and Stebbins, R.C. 2003, A Field Guide to Western Reptiles and Amphibians (3<sup>rd</sup> Edition), Houghton Mifflin Co.. In addition, work in the Verdugo Mountains should also utilize Schoenherr, A.A. 1976 (1996 reprint), The Herpetofauna of the San Gabriel Mountains, Los Angeles County, California, Southwestern Herpetologists Society. Inclusion of the above species in the focused surveys list and/or expected species list suggests either careless use of range maps, literature or a lack of knowledge of reptile distributions.

**Mitigation p. 4:**

The loss of 232 Oaks and 27 sycamores in a natural open space setting is highly significant and is **not** mitigated by plantings in rows or artificial clusters along "entryways", road right-of-ways", "parks and common areas", "detention basins", "flood control", "fuel modification areas", "private lots" and "equestrian trails". These plantings, in and adjacent to heavy disturbance do not replace the full ecosystem support of the wild oaks and their understory. The presumably narrow, strip plantings along entryways, right-of-ways, etc. and vehicle, human recreational and flood control maintenance disturbances in these proposed sites greatly reduces the ecosystem value of the trees. The statement in Significance After Mitigation paragraph, suggesting that planted trees will provide "seed production" to "compensate fully for the loss of mature trees" is **false**. Seedling oaks will not regenerate under planted oaks on artificially manicured and disturbed human-use sites listed. Mitigation for this loss needs to be

completely reconsidered. How will the native plantings under oaks be protected from adjacent recreational disturbances?

Pg. 16 Table of Sensitive Species

“Logger-Head Shrike” should read Loggerhead Shrike.

Pg. 18: While Cactus Wren was listed in the Table on page 15, it was not mentioned here as a survey species, during surveys for other sensitive Coastal Sage Scrub-obligate avifauna.

Pg. 19: Again, focused surveys for Orange-throated Whiptail, a species completely out of range here, is foolish.

Pg. 20: The limitation mentioned of rare plant surveys conducted during a year with about 30% of normal, annual rainfall should require a re-survey in the next Spring season with closer to normal rainfall.

Pg. 26: Southern Coast Live Oak Riparian Forest:  
The Jepson Manual, a cited reference, lists no such species as California Buckwheat (*Eriogonum californicum*).

Pg. 27: Reptiles – Coastal Sage Scrub:  
Gilbert’s Skink would not be expected at this location nor elevation. It is a mountain or desert species not recorded from the Verdugo Mtns.

Pg. 28: Birds – Scrub Communities:  
A number of birds listed as expected to use the site as migrants, during winter, are not found in winter in southern California (Black-chinned Hummingbird) or are more likely year-round resident (Song Sparrow), summer resident (Orange-crowned Warbler) or strictly migrants (spring and fall, i.e. Allen’s Hummingbird, Costa’s Hummingbird, Black-throated Gray Warbler, Ash-throated Flycatcher)  
Woodland and Riparian Communities:  
The “plain titmouse” was re-named “oak titmouse” and scientific name changed, a number of years ago (American Ornithologists Union).  
The Rufous-crowned Sparrow is a resident species, not migratory as listed.  
Suggests a weak knowledge of bird distribution by the consultants.

Pg. 41: *Dudleya densiflora* actually occurs from “300-520 m” (Jepson Manual), far below the “4000-9300 ft.” stated; but is restricted to the San Gabriel River area and would certainly not be expected in the Verdugo Mountains.

Pg. 51, Pg. 65: Orange-throated Whiptail is again considered, and while not detected is treated as if “it likely occurs within areas of suitable habitat, which occur in small pockets throughout the study area.” As mentioned above, this species does not occur in Los Angeles County.

Pg. 52: The Mountain Yellow-legged Frog was listed as Federally Endangered in 2002. Concur that it probably is absent from the Study Area.

Pg. 65: The Ashy Rufous-crowned Sparrow was recorded at four locations and all mapped sites on the Sensitive Species Location Map are impacted directly by the proposed development grading. The species was apparently not located anywhere else in the open space areas of the property. Thus the statement that "Although some construction will occur in or near areas where this species was observed foraging, sufficient habitat would be preserved on the project site for the small number of birds observed, and, as such, a less than significant impact would occur." is wishful thinking at best or patently false at worst. This resident, non-migratory subspecies is very habitat specific, occurring where there are openings in coastal sage scrub/chaparral, often on rocky slopes with grasses. No mitigation to avoid the direct impact to this species is indicated.

**Appendix G (Section 9) – Biology**

**Appendix A – Faunal Compendia**

The listing of Speckled Rattlesnake, *Crotalus mitchellii* (misspelled in list), in the Faunal Compendium as "likely to occur on site" is another indication that consultants lack knowledge of reptile distributions. This species is restricted to the Mojave Desert region and mountains and deserts to the south of Los Angeles County.

The Western Meadowlark is in the Family Icteridae, not Emberizidae as listed.

The **Vascular Flora** list, while quite extensive, needs proofreading for spelling errors. At least 10 were noted in Scientific and Common Names.

The **Vegetation Map** and site photographs clearly indicates that virtually the entire property and proposed project site is in natural, remarkably undisturbed condition with dense mixed chaparral, coastal sage scrub and oak woodlands. The proposed project would cause significant impact to this large, intact and undeveloped portion of the Verdugo Hills. There is insufficient information that a biological constraints analysis was performed prior to project planning, to avoid impacts to resources.

Charlie Marko  
7930 Apperson Street  
Sunland, CA 91040

December 28, 2003

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

Re: Canyon Hills Draft EIR , ENV-2002-2481-EIR , SCH #2002091018

Dear Ms. Zaitzevsky,

The Draft Environmental Impact Report for Canyon Hills is, in my opinion, inadequate, incomplete, and misleading. In particular, the section dealing with Aesthetics (IV.N) blatantly tries to downplay the enormity of the project and it's irreversible harm to our community's visual resources. Key information (found elsewhere in the DEIR) is omitted and/or contradicted in the Aesthetics section in an attempt to fool the reader into thinking that the project will be "invisible".

Here are some examples:

1) There will not, as the DEIR claims, be 693 acres of "permanently preserved open space". Throughout the DEIR, the claim is made that 693 acres of the 887 acre project area will be set aside as "permanently preserved open space". The developer apparently has arrived at this figure by subtracting the 194 acres that the homes will be "clustered" on from the 887 acre total project area. But on page III-6 (Project Description, Grading and Construction) we are told that "the combined grading operations for the entire project site would affect a total area of approximately 240.23 acres". Then, on page IV.N-14, (only one page after making the "693 acres of open space" claim) it's stated that "...grading and brush clearance/fuel modification will permanently alter the appearance of 310.7 acres within the project site." This would leave us with only 576.3 acres of open space. Unless, of course, one turns to page IV.C-3 (Hydrology), and learns that only 448 acres would be unaffected by the proposed development.

On page III-8 (Project Description), the report concedes that the “permanently preserved open space” will consist of both “modified open space” and “natural open space”. Obviously, the developer is trying to call any patch of land where there isn’t a house “permanently preserved open space”. The parking lot of our local Kmart has plenty of “modified open space”, but you won’t find anyone hiking or picnicking there on a Sunday afternoon.

2) Use of contradictory and/or misleading language: The proposed project would require a massive amount of grading. Ridgelines would be reduced in height by as much as 80 feet. Artificial slope walls would reach as high as 200 feet. Grading operations “would involve a total earthwork quantity of 4.6 million cubic yards (plus 20 percent for remedial grading).” The Aesthetics section (page IV.N-11) of the DEIR says: “Overall, the effect is that of a community perched on the land, rather than forced onto it.”

I can think of no bird that needs to move 4.6 million cubic yards in order to “perch”.

3) The Aesthetics Section fails to even mention the construction of two 1.5 million gallon water tanks. According to page IV.L-3 (Utilities and Service Systems-Water), “the proposed project would be required to provide two 1.5 million gallon water tanks.” One would be “at an elevation of approximately 1,9000 feet” and the second would be “at an elevation of approximately 2,200 feet”. It goes without saying that these two massive structures would have a significant adverse effect on the visual character and quality of our community. Yet there isn’t a single word about them in the section of the DEIR dealing with aesthetics.

4) “Aesthetics” does not address the construction of sound barriers along Interstate 210. Figure IV. E-2 (Receptors and Barriers used in Traffic Model) maps out the placement of sound barrier walls along Interstate 210. These walls, ranging in height from 6 to 16 feet, would obviously have a significant adverse effect on the visual character of the freeway. “The Sunland-Tujunga Community Plan designates Interstate 210 as a scenic freeway” (page IV.N-2). Despite this, the DEIR never discusses their impact on our community’s visual resources.

5) No measurements are ever given for the minimum distance between houses. The DEIR claims that the development has been “designed to create a low-density, clustered residential community that avoids the appearance of a ‘tract’ development”... “Hence, the design avoids the look of large house squeezed onto small lots.” But in section III (Project Description) we are told that these homes will average 4,000 square feet in size and be situated on lots as narrow as 70 feet. The only distance the report ever provides for the space between these large homes is “ample side-yard spacing” (page IV.N-11, Aesthetics). One can only assume that “ample” can be interpreted as “legal”. “Legal” side-yard spacing could result in very large homes spaced only 10 feet apart.



6) No measurement is given for the proximity of homes closest to Interstate 210 or La Tuna Canyon Road. In addition to designating Interstate 210 as a scenic freeway, the Sunland-Tujunga Community plan designates La Tuna Canyon Road as scenic secondary highway. The proximity of the development's "clustered" homes will help determine its impact on the visual character of these roadways. The DEIR fails to provide this information, and therefore fails to fully assess the project's impact on our community.

7) The Visual Simulations are vague, incomplete, and misleading. The DEIR's Visual Simulations (Figures IV.N-12 through IV.N-20) do not depict the housing development proposed in this report. The spacing between houses is far too great to accommodate 280 homes on 194 acres. The lots appear much larger than the 70 to 90 foot parcels described in Section III, Project Description. There is no evidence of the massive landform alterations that will occur after 4.6 million cubic yards of grading. The simulations from Interstate 210 do not show the 6 to 16 foot sound barrier walls. There is no evidence of brush clearance/fuel modification; the homes in these fanciful "simulations" seem to be completely enveloped in native vegetation. As depicted, these homes would most likely fail to comply with brush clearance standards.

The DEIR (page IV.N-17) claims that, "The photo simulations include generic streetscape and residential landscaping, aged to show what the growth could look like after approximately 10 years of growth." This statement begs the question: If they find it necessary to artificially age these photos by a decade, just how bad will this site look for the first 10 years?

Overall, these simulations are very vague. The "photos" are taken from an extreme distance, with the houses appearing as blurry objects that are smaller than the cars and bushes in the foreground. They fall far short of providing an accurate picture of what this project will look like.

8) The "Observation Points" chosen for the DEIR seem to be carefully chosen. Observation Points 1 through 6 of the DEIR (IV.N-15) are probably the only spots on the planet where there would be little or no view of this massive development. Any reasonable person looking at the site map will conclude that this project will be seen from a great distance and from virtually any angle.

9) The report attempts to minimize the loss of visual resources along Interstate 210 and La Tuna Canyon Road. By using numerous hypothetical situations that sound like grade school math word problems-- "At 65mph, it takes a vehicle approximately two minutes thirty seconds to traverse the length of the property."—the DEIR (pages IV.N-7 through 9) tries to downplay the enormous adverse visual impact of this project on our scenic roadways. Yes, one will only see it for two and a half minutes when traveling at 65mph, because at 65mph, you're covering over a mile a minute. By the DEIR's own admission, this project will have 2.7 miles of frontage along Interstate 210 and stretch

approximately one mile along La Tuna Canyon Road. Yet the author(s) attempt to bury these facts under pages of frivolous "word problem" text.

The visual character of the Verdugo Mountains is more than just a backdrop. Our community's visual resources are one of it's most precious. These resources are non-renewable. The authors of this report must realize this, as well. That would explain why the section on "Aesthetics" is so vague and incomplete. This section of the report, as well as the rest of the DEIR, is inadequate. It must be revised so that it reflects not just the developer's opinion, but the truth, as well.

Thank you for your time and consideration.

Sincerely,

Charlie Marko



Comment Letter No. 172  
Attachment 172uu

Dr. John A. Davitt  
Superintendent/President

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Dr. Martin Z. Pilgreen

December 25, 2003

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

Dear Ms. Zaitzevsky,

As a Ph.D. biologist, lifelong resident of the Foothill area, and full-time biology professor at Glendale College, I have serious objections to many of the conclusions drawn in the Canyons Hills Development Project DEIR (file #2002091018) prepared by Glenn Lukos Associates, Inc. (GLA). In my opinion, the report greatly understates the environmental impact of this proposed development.

Specifically:

1. Regarding the removal of up to 232 coast live oaks, followed by mitigation in the form of replanting.

The assertion that the removal of up to 232 coast live oaks would be, after mitigation and the passage of 10-20 years, "less than significant," is very difficult to accept. For one thing, the assumption is being made that a significant fraction of the 1770 oaks (mostly seedlings) to be planted<sup>1</sup> will survive to maturity. To replace the 232 slated for removal would require a survivorship of 13%. I view this as overly optimistic and would predict an actual survivorship of 1% or less. The question of survivorship is not even discussed in the report.

But even if a substantial fraction did survive, the time frame of 10-20 years is absurd, given that the most valuable trees in the area are 100-200 years old or more. I suggest that the mature coast live oak population and the plants and animals they help support will be substantially impacted for much longer than 10-20 years.

I also take issue with the conclusion that "the loss of many of the impacted trees would not result in a negative aesthetic impact because they do not contribute to the existing visual environment."<sup>2</sup> (This is in reference to trees that are not easily seen from existing highways or trails.) This statement reveals a striking lack of understanding of the nature of ecosystems. (Unseen trees support birds, mammals and reptiles and that *are* seen and *are* desirable, not to mention understory plant species, invertebrates, etc.) Ecosystems are complex webs, not simply collections of autonomous species. The statement causes me to question the credentials of the author that wrote it.

2. Regarding "re-vegetation of graded areas with native habitat," as part of the mitigation plan.

It is well-known that disturbed areas in Southern California, even when seeded with native species, rarely return to a native state. Instead they offer prime new habitat for invasive species like pampas grass, fountain grass, black mustard, Spanish broom, and others. Because of the size of the proposed development, this would represent a major "land-grab" for these species, and a concentrated new source of wind-blown seed which would certainly spread into surrounding areas. This prospect is given only scant mention in the report, but in my opinion, is sufficiently serious by itself to question the conclusion of a "less than significant" impact following mitigation.

<sup>1</sup> 1,951 minus 181 western sycamores = 1770 (Table 9, Section 7.3 of Appendix G: Biological Technical Report)

<sup>2</sup> Section 5.6, Appendix G.





Dr. John A. Davitt  
Superintendent/President

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Robert K. Holmes  
Victor I. King  
Dr. Martin Z. Pilgreen  
Dr. Kenneth N. Sweetnam

3. Regarding the wildlife corridor issue.

I agree that the development would not be a major physical impediment to movement of large animals like mountain lions between the Verdugos and San Gabriel mountains. But the report is in error in saying "the area would not represent suitable habitat," (for mountain lions), and in citing "low density of mule deer, the main food source" as a reason.<sup>3</sup> Mountain lion sightings on Mt. Verdugo *are* reported, and since the animals do *not* reside there permanently, it means the "Missing Link" corridor discussed in the report, tenuous as it may be, *is* in fact used by mountain lions. A major new development on the corridor's edge would squeeze them more tightly, perhaps enough to ensure that mountain lion sightings on Mt. Verdugo are a thing of the past. (Desirable to some perhaps, but not to me.)

Regarding the density of mule deer on Mt. Verdugo, it is documented that deer populations throughout Southern California's natural areas (as well as the nation's) would better be described as "over-populated" than too low to support mountain lions. Indeed it is the extreme rarity of mountain lions that has pushed the deer population to considerably *higher* levels than in historic times.

In conclusion, the Canyon Hills DEIR contains some erroneous assumptions, factual errors, and seems to reveal a low level of understanding of the biology of ecosystems. The environmental impact of this proposal is clearly **not**, in my view, "less than significant," as the report concludes. I therefore ask you to consider requiring that the study be redone, and that an improved version be released for additional review and comment. Thank you.

Sincerely,

Robert H. Mauk, Ph.D.  
2121 Valderas Dr. #67  
Glendale, CA 91208

<sup>3</sup> Section 4.5, Appendix G.



December 29, 2003

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

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

Dear Ms. Zaitzevsky:

The purpose of this letter is two-fold:

- 1) To provide analytical response to specific sections of the Canyon Hills DEIR; and
- 2) To provide a comprehensive response to the implications of the Canyon Hills DEIR on the larger issues of Los Angeles City planning in general, and Sunland-Tujunga community planning in particular.

These two purposes are intertwined and inseparable, as your office well knows. However, the Canyon Hills DEIR neither adequately analyzes the specific impacts of the proposed project, nor adequately addresses the larger questions which any DEIR must answer – namely, how a development project will actually bring tangible benefit to the local community and the City as a whole.

For example - in terms of a project providing tangible benefit to the City, I am assuming it is not enough if the City can just collect tax revenues from the new residents of a development project. If there is to be any integrity to City Planning at all, per California State Code, there must also be compatibility between the project's goals and the City's goals, between the project's goals and the General Plan, between the project's goals and the Community Plan, and between the project's goals and the Specific Plan. The Canyon Hills project woefully lacks such compatibility with any level of these plans.

In fact, the Canyon Hills DEIR is so inadequate in its analysis, so misleading in its conclusions, and so deceptive in its choice of words as to obfuscate the real impacts on the surrounding environment as well as on the City's stated planning objectives and total planning philosophy as described in the General Plan.

The Canyon Hills DEIR fails as an adequate environmental analysis of the potential impacts of this project. CEQA requires that an EIR contributes to informed decision making and a public participation process, yet this DEIR is

written in such a manner that distorts and obscures the bigger picture, and consequently hinders informed decision making. In this letter I have explained several specifics regarding this substantial flaw throughout the report.

A few words about my background and perspective as a commenter on the DEIR so you'll know the context for certain comments:

- I have been a resident and homeowner in Tujunga for 20 years, live very near the proposed development site, and have walked the hills near and around the project site several times a week throughout those 20 years. Consequently, I am a citizen expert based on first-hand observations of the area - throughout all seasons of the year and under all weather conditions – for a range of environmental impacts.
- I am an organizational consultant, with a Ph.D. in Organizational Psychology. For good or ill, I am all too familiar with the type of tactics that are used to sway any group of people to “buy in” to an idea, project or goal – even when it is not to their benefit. This is called “conditioning”. I have watched this developer for the past few years attempt to condition the community via “focus groups” and networking, per the tactics alluded to on the website for Consensus Planning Group – the public relations firm with the same address as the developer, Whitebird. Translation: I am not fooled by these tactics, many community members are not fooled by these tactics, and I hope neither is the Planning Department nor other City officials.

Given these aforementioned “tactics”, there is something quite fundamental at stake here – the City's integrity regarding how and why it may or may not approve of a particular developer's project. This is the broader context in which the DEIR is reviewed, analyzed, and approved or not – in whole or in part. It has everything to do with how transparent – i.e., how public – the City's approval process actually is – and how the City does or does not hold firm and steadfast in its support of the General Plan, the Community Plan, and the Specific Plan – and the fragile links across these Plan levels.

Therefore, due to serious flaws, omissions and misstatements, the Canyon Hills DEIR needs to be revised and reissued to the public again, so that the public can participate in a transparent, fully-informed process in accordance with CEQA regulations and the spirit of the City's stated planning process.

There are numerous aspects of the DEIR which are seriously flawed. I will discuss just a few of these issues as follows:

- 1) **The Project Objectives are misleading and inaccurate based on their own disclosure and analysis, and therefore will not be achieved as stated.** In addition, the Objectives inherently serve to undermine the links between the General Plan and the Community Plan. While there are flaws with each of the Objectives, I will analyze only some of them to illustrate the point. For example: