



Shadow Hills Property Owners Association
Dedicated To Preserving Rural Community

December 10, 2003

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ENVIRONMENTAL
UNIT

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

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

Ms. Zaitzevsky,

The Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the DEIR) is highly incomplete in it's evaluation of it's potential cumulative impact relative to traffic, fire and police protection services and any number of additional significant public services. The DEIR lists in Table II-3 it's version of significant cumulative projects which include such relatively **insignificant** items as a fast-food restaurant, auto-repair shop and single family residence. Such projects as the fast-food restaurant and auto-repair shop would be quite minimally significant to La Tuna Canyon as they are located on Foothill Blvd. No reference is made in this table or anywhere else in the DEIR to the 34-unit development now under construction in a more westerly portion of the Canyon itself and it's potential cumulative effects on traffic, fire and police protection services, etc.

25-1

In regard to police services – the Project Site is located in Reporting District RD-1694 of the Foothill Station. Table IV-J-1 provides 2002 statistics for crime rates in RD-1694, however ~~fails to compare this to population levels. One must search the appendices to find statistics prepared by the LAPD Community Relations Section Crime Prevention Unit which notes in it's Table of 2001 statistics that there were 32 crimes per 1,000 population committed.~~

25-2

The LAPD preferred emergency call response time is 7.0 minutes. The DEIR provides statistics for response times for the entire Foothill division (DEIR IV-J-15/16) which is 11.4 minutes, but makes no reference to average emergency call response times for RD-1694, a statistic that would be far more significant to us. RD-1694's average emergency response time is 14.7 minutes.

25-3

Should the entire Canyon Hills Project be approved as set forth in the DEIR, each police officer will have to face a 93% increase in crime rate from this development alone.

25-4

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32 (crimes)/1,000 population) = X (crimes)/1,831 (pop. in 2001 + pop. of Canyon Hills)
 X = 58.6

Increased # of crimes committed = 58.6 - 32.0 = 26.6

26.6 (increased # of crimes committed)/32 (# crimes committed in 2001 = X%/100%

X = 93.1%

25-4

The Canyon Hills Project, as set forth in cumulative conjunction with other significant projects as referred to above, will noticeably further strain the already chronic shortage of the Police Department thereby increasing even further the emergency response time to a totally unacceptable level.

25-5

Fire protection services also will be facing a number of problems. For starters, the primary response Station for the Canyon Hills Development would be Station # 74 on Foothill Blvd, located at a distance of 2.8 miles, a distance out of compliance with the Fire Code which specifies the maximum response distance for a truck company to be 2.0 miles. The primary route that this Station would utilize to reach the Canyon Hills Project area would be via Tujunga Canyon Blvd, a one-lane road with no shoulder on which cars can pull over. A similar condition exists on Lowell Ave., a potential alternate route for Station 74. It is already difficult for Fire trucks to maneuver on these roads in emergency situations due to traffic, the notable increase in traffic levels on Tujunga Canyon Blvd. from the Canyon Hills Project alone would make it next to impossible.

25-6

All entries under the DEIR Fire Mitigation Measures (DEIR IV-J-9/10/11) are already existing specifications under Fire and Building Codes and, as such, hardly serve as mitigation measures. Their pat on the back with the following quote from the DEIR (DEIR IV-J-9): "With the implementation of Mitigation Measure J-1-1 (installation of automatic sprinkler systems), the proposed project would not have a significant impact on fire protection services." Aside from the fact that automatic sprinkler systems are already required in High Fire Zone Districts by Code, in the event of a wildfire what good would a sprinkler system, designed to squelch a fire internal to a structure, serve as the structure burns from external flames leaving the sprinkler system to defend a long gone building.

25-7

The suggested secondary access routes leading to Inspiration Way or Verdugo Crestline Drive are unimproved and sub-standard with roadways approaching these access roads ie Alene Dr. and Hillhaven Ave. being too narrow, too steep, and with their numerous hair-pin turns making them impossible to mitigate.

25-8

And what about all the traffic heading for La Tuna Canyon Road – the only real exit – in the event of a wildfire? Does anyone remember the southern California fires of October 2003? The bumper-to-bumper traffic, totally congested and moving at a snail's pace because all developments fed into one main road – just like La Tuna Canyon Road!

25-9


 ELEANOR G.M. KRUEGER