



Shadow Hills Property Owners Association

Dedicated To Preserving Rural Community

December 22, 2003

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

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 ENVIRONMENTAL
 UNIT

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

Ms. Zaitzevsky,

We commend Canyon Hills for accepting among it's 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.

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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.?

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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 1/2 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

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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.

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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

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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

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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

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Bvd, 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

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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

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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

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
 $X = 20.9$

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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 1/2 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


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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?

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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.

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