

Sunland-Tujunga Neighborhood Council

IMPROVING THE QUALITY OF LIFE IN SUNLAND TUJUNGA

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RE: The Verdugo Hills Golf Course Project - RP-DEIR
6433 La Tuna Canyon Road Project
Case No. ENV-2007-3083 - EIR
SCH No. 2007121012

BACKGROUND:

The Sunland-Tujunga Neighborhood Council [STNC] was formed in 1999 and certified in 2003 as part of the City of Los Angeles' effort to provide community members the opportunity to be more directly involved in issues impacting their neighborhoods. The STNC and the Land Use Committee (LUC) consider the proposed development and loss of the Verdugo Hills Golf Course [VHGC] to be a critical land use matter, one that we have been following very closely since the release of the first Draft Environmental Impact Report in 2009. The STNC and its Land Use Committee commented on the DEIR and that correspondence is attached (Appendix A).

Both the STNC and the Land Use Committee have held numerous meetings on the VHGC and have been actively involved in the review of this project and its evolving nature. We have considered and discussed the potential for keeping the VHGC as an important recreational component of our community's life. This has included discussions regarding the use of Proposition "O" funds to retain the property for public use, as well as exploring options available to purchase the property and to turn it over to a public lands conservation authority. Throughout these discussions, we have been kept mindful of the property owner's intentions to develop the property with the currently proposed project or a variant thereof. The applicant's project architect has attempted to engage the community and solicit input on the currently proposed project and has attended numerous meetings of the Land Use Committee throughout the past year.

DRAFT ENVIRONMENTAL IMPACT REPORT (2009)

The original Draft EIR for the project was circulated for public review in May 2009. Public comment on the DEIR was extensive and included a broad range of opinions and analyses of the EIR's adequacy in addressing potential project impacts. To date, the community has not seen or been made aware of any responses to comments made on the 2009 DEIR. As a result, we are concerned that much of this commentary might be dismissed or inadequately addressed as these comments addressed a prior version of the project. Our presumption is that the comments received by the Lead Agency on the 2009 DEIR will be fully addressed, as will the comments on the RP-DEIR.

The community has changed since 2009. Many new residents have moved into the area and are unaware of the pending development of the project site. They were not able to comment on the 2009 EIR nor were they made aware of the impacts of the project. This includes residents that currently live in close approximation to the VHGC.

Of equal concern is the Lead Agency's decision not to recirculate the entire 2009 DEIR, but only the sections addressing cultural resources, transportation/traffic, updated alternatives, and greenhouse gases (new). As indicated above, the many new residents in our community should have been given the opportunity to comment on the entire DEIR, as they were not around in 2009. In addition, the "shelf life" of a CEQA document is typically only five years. After that, the analysis in the document can no longer be seen as valid and should be updated. The baseline used for analysis of environmental impacts has shifted since 2009. We ask the Lead Agency to re-circulate the entire EIR for public comment, not just the chosen sections. The Lead Agency must address environmental impacts posed by this project in the context of current baseline conditions across all sections of the DEIR.

Chapter III.A - GREENHOUSE GAS EMISSIONS:

Our comments on the Air Quality section of the 2009 DEIR noted that that analysis failed to describe the project or the construction activities in detail. Construction activities will involve major grading (including 96,000+ cubic yards of import) and other intense activities, and would last for a period of 29 months. This level of grading and duration of grading activities will result in significant NO_x and PM impacts. The Lead Agency should have required that this section of the 2009 DEIR also be re-circulated and include an updated analysis of air quality impacts.

Comments on the Air Quality section in the 2009 DEIR included the following:

- Some of the construction mitigation measures proposed are not feasible; many of the types of equipment fixtures they are requiring are not yet available to contractors (i.e. diesel oxidation catalyst systems).
- According to the DEIR, NO_x emissions will be reduced by mitigation measures from 261.41 lbs/day to 64.95 lbs/day. This is a huge percentage reduction in NO_x emissions that is very rare and likely not to be achieved through the recommended mitigation.
- PM₁₀ and PM_{2.5} emissions portrayed in the DEIR are unrealistically low at 18.13 and 6.05 lbs/day, respectively. The amount of grading and duration of grading activities for such a large-scale project can *not* realistically have emissions that are that low. The rule of thumb is 10 lbs/day of PM₁₀ for every acre of grading.
- It is possible that the authors of the DEIR have misapplied the URBEMIS model and dispersion models to get the results they wanted, because the emission volumes are not feasible.
- Localized concentrations of NO₂ during construction were found to be 0.18 ppm - which is equal to the threshold of significance. Yet the DEIR concludes "less than

significant” without any explanation. If the air quality model were run objectively, NO₂ concentrations would be notably higher.

- The project proposes placing homes within 500 feet of the 210 Freeway. Per CARB’s guidance, this requires a Health Risk Assessment (HRA); yet no HRA was conducted. Rather, the 2009 DEIR includes mitigation measures that require homes be fitted with HVAC filters. This is *not* an effective mitigation measure for homes, because residents will undoubtedly open their windows, rendering the filtration system useless. However, since no analysis was conducted, it is impossible to know if the filters are even adequately effective in principal.

In our experience, greenhouse gas emissions analyses are closely correlated with the analyses of air quality impacts resulting from the project. For example, it’s expected that both the air quality and greenhouses gases impact modeling exercises would use the same software to predict impacts in addition to using the same identical software program modeling inputs. Our review of the Greenhouse Gases section in the RP-DEIR found that a different software was used to model greenhouse gases impacts (*URBEMIS 2007*) while, in 2009, the model chosen to analyze air quality impacts was the *CalEEmod* air quality impact model. As discussed below, this introduces and inconsistency between the analyses of air quality impacts included in the 2009 DEIR and the analysis in the 2015 RP-DEIR.

A review of the 2009 DEIR Air Quality section, Table IV.C-10 indicates the project has a potential 170.72 lbs./day of CO (Carbon Dioxide) emissions. The Greenhouse Gases section of the RP-DEIR indicates a reduction in CO emissions to approximately 78 lbs./day. This is to be expected as improvements in vehicle fuel emissions technology, along with the implementation of other air quality regulatory measures, has resulted in less impacts to air quality in 2015. Nevertheless, the Air Quality section of the DEIR should be updated to reflect the more recent analytical methodology and conclusions in the Greenhouse Gas section of the RP-DEIR.

Chapter III.B - CULTURAL RESOURCES/HISTORIC RESOURCES

The STNC and LUC had previously commented on the impacts of the proposed project on cultural/historical resources on the project site. Those comments are included in the correspondence sent to the Lead Agency in 2009 (Appendix A). The re-circulated analysis of these impacts is helpful in describing the history, actions, and events that have transpired since circulation of the 2009 DEIR, especially as it relates to the proposed Tuna Canyon Detention Station (TCDS) Memorial. However, there are discrepancies and misrepresentations of historical facts included in the narrative provided by the EIR consultant.

The impacts of the project on said resources is more adequately addressed in correspondence from Ms. Nancy Kay Oda and Dr. Lloyd Hitt, addressed to the City of Los Angeles (Appendix B). We fully support their comments regarding the misrepresentations of the past history of this site and the inadequate mitigation that is currently being proposed. For example:

- While the 2009 DEIR indicated that there was no evidence that cultural resources or human remains were located on the project site (due to the site’s

- high archaeological sensitivity) there remains a possibility that the construction phase of the proposed project could encounter important cultural resources. To address this possibility, the DEIR included mitigation requiring that an archeologist be retained if sensitive cultural resources are encountered during the construction phase of the project (Mitigation Measure E.2-1, E.2-2). Both of these measures, while commonly applied to projects of this type, are inadequate. Because of the past known use of the project site as an Indian Camp, the Lead Agency should undertake a more thorough analysis of potential buried resources on the project site. This should include both archeological and paleontological subsurface investigations of the site. At the very least, this project requires full-time monitoring by a qualified archeologist as well as monitoring by Native American representatives during the construction phase of the project.
- There is no discussion in the RP-DEIR regarding the notification and consultation with Native American tribes as required by Assembly Bill 52 (AB-52), and codified as Section 21080.3.1 of the California Environmental Quality Act (CEQA).
 - The proposed mitigation measures (E.1-1, E.1-2, and E.1-3) are inadequate and do not fully address the impacts of the project. They also defer mitigation to some future date period. This is a violation of CEQA. (*CEQA Guidelines Sec. 15126.4, sub. (a)(B)(2)*). It does this by leaving the future of the TCDS memorial in the hands of a committee (“Working Group”) without providing guidance on how the mitigation is to be accomplished or implemented.
 - Mitigation Measure No. E.1-3 should identify the performance standards, which must be met by the mitigation measure. While it is appropriate for the Working Group to make recommendations, the EIR should determine who is making the decision. The mitigation measure improperly delegates the decision-making function to the City of Los Angeles without providing proper guidance. This measure should identify what agency or department of the City has decision-making responsibility.
 - Mitigation measure E.1-3 states “implementation of the commemoration plan would result in adverse impacts to the HCM (Historic-Cultural Monument) designated one-acre site.” The measure goes on to require a qualified preservation consultant be retained to validate compliance with the Secretary of the Interiors standards. This is an unnecessary and costly requirement. The commemoration plan IS the mitigation and, if implemented, mitigates the project’s impacts on cultural and historic resources.
 - The analysis and mitigation does not go nearly far enough in securing a publicly accessible and meaningful commemoration site for the TCDS. The community has not seen a fully rendered site plan of the memorial. The RP-DEIR does not provide even basic details of the layout of the memorial, where public parking would be provided, how it would be accessed, and maintained.
 - No schedule is provided for implementation of the TCDS memorial. The RP-DEIR should provide a basic timeline for implementation of the memorial. Project conditions could, for example, require the conveyance of land for the memorial site by the property owner by a certain date. The issuance of

building permits and/or occupancy permits should be withheld until such conveyance is accomplished. Additional insurances and guarantees (such as right of public access) should be obtained prior to the issuance of such permits.

For further comment regarding the updated Cultural/Historical Resources section of the RP-DEIR please refer to correspondence from Ms. Nancy Kay Oda and Dr. Lloyd Hitt which are addressed to the City of Los Angeles (Appendix B). The STNC and LUC fully concur with the opinions contained in this correspondence.

Chapter III.C - TRANSPORTATION & TRAFFIC:

The STNC previously commented on the Transportation and Traffic section of the 2009 EIR. At that time, both the STNC and community found the analysis of transportation and traffic impacts to be inadequate, erroneous, and flawed. In addition, we found the proposed mitigation measures to be inadequate. Our key concerns regarding traffic conditions in the area in 2009 included the following:

- Tujunga Canyon Boulevard has seen a steady rise in vehicle volume since 2009 and well before that. In the last two decades it has become a de facto extension of the 210 Freeway access ramps at and around Lowell Avenue.
- As the volume of vehicles has increased so has the speed at which motorists drive the winding road. The DEIR refers to a posted 30 mile an hour speed limit for Tujunga Canyon Boulevard. That limit is seldom observed. It is difficult to drive 30 miles an hour (downhill) when the cars behind you are pushing 50 miles an hour. When cars are not bumper to bumper in traffic the actual speed range for Tujunga Canyon Boulevard is closer to 40 to 55 miles an hour. This combination of high vehicle volume and excessive speed creates a very dangerous traffic corridor which runs from Foothill Boulevard to the north and winds its way along Tujunga Canyon Boulevard down to Honolulu Avenue, and eventually Lowell Avenue.
- In projecting the number of trips that would be generated by the proposed project, the consultants used the Institute of Transportation Engineers (ITE) Trip Generation manual, 7th Edition, 2003. However, the formulation used by the consultants involved a critical error. They based the 'Persons Per Dwelling Unit' on the 1997 Sunland-Tujunga-Shadow Hills-Lake View Terrace-East La Tuna Canyon Community Plan and its projections for 2010 (2.91 persons per household). The Community Plan is very outdated and does not accurately reflect current persons per residence ratios in our area. According to the most recent estimates from the State Department of Finance, the projected persons per household (PPH) for 2015 was 2.97 with a 2030 estimate of 2.98 PPH.

The Traffic and Transportation section of the RP-DEIR continues to underestimate the traffic impacts of the project. Mitigations described in the section are not adequate. Our concerns include the following:

- Traffic count data was collected in 2012 and 2013. This count data was collected at five intersections in the project area and at the on and off-ramps

- for the 210 freeway at Lowell Avenue. Future traffic was generated using a 2% growth factor. This growth factor was used to determine existing (2014) traffic volumes and future volumes with project and future volumes with project and cumulative projects. Because traffic volumes have increased significantly over traffic volumes analyzed in the 2009 EIR, the traffic consultant should have taken new manual counts (2015) at the five intersections and freeway ramps rather than simply applying a 2% growth factor to existing and projected traffic counts. The environmental consultant/project applicant should pay for a traffic counting firm to take new and more current traffic counts and base their analysis of traffic impacts on these new counts.
- The proposed traffic signal at Pali Drive and Tujunga Canyon Road (Mitigation Measure PDF-1) is problematic. What will the timing of this signal be and how will it improve traffic flows on Tujunga Canyon Road between Tuna Canyon Road and Pali Drive? We believe this new signal will *aggravate* traffic at this location. In all likelihood, traffic will gridlock between the two intersections.
 - The RP-DEIR states that the intersection of Pali Drive and Tujunga Canyon Boulevard “is expected to continue to operate at LOS F during both the weekday AM and PM peak hour.” The analysis goes on to conclude that cumulative traffic impacts would be less than significant. How can this conclusion be reached regarding the future operations of the intersection? Will the proposed signalization of this intersection alleviate traffic conditions at this location by improving the level of service?
 - We are aware that planned cumulative projects in the area have the potential, along with the proposed project, to severely impact traffic in the area. There are, for example, the planned and already approved Canyon Hills (221 homes) and the proposed Canyon Park (242 homes) developments. These projects, plus the currently proposed project and incremental increases in the housing stock in our area, require a more rigorous analysis of future traffic impacts and mitigation measures that address the very real traffic problems in this area.
 - Nowhere in this re-circulated Transportation and Traffic section of the RP-DEIR is the future Tuna Canyon Detention Station (TCDS) memorial addressed. Assuming such a memorial is established on the project site, what will the trip generation for such a use be? How will traffic and access in the area be affected by such a memorial site? The RP-DEIR is insufficient by not analyzing potential traffic impacts associated with the establishment of such a publicly-accessible memorial.
 - The credit for existing vehicle trips credited to the golf course are inaccurate. The ITE Trip Generation Manual describes vehicular trip generation for golf courses and for driving ranges separately. The consultant traffic engineer has assumed a higher trip generation for the golf course because the golf course and driving range uses are combined on the same property. For example, Land Use Code 432 in the ITE Trip Generation Manual is for a “standalone” driving range, not for a driving range affiliated with a full-size golf course. Once you remove the 382 weekday daily trips attributed incorrectly to a non-existent standalone driving range from the “existing use” category, the number of new

trips attributable to the proposed development goes from 1,155 to 1,537. In other words, the DEIR is underestimating the number of new trips attributable to the proposed development by about 20%.

- The DEIR traffic consultant should have directly counted the existing golf course traffic instead of merely estimating it. The consultant would have been granted permission to access the property, as they were hired by, and are working for, the property owners.
- When the original DEIR was issued in 2009, there was a list of other developments in the area that would contribute to cumulative traffic impact (Table IV.N-11 - Related Projects Trip Generation. The table included 25 related projects in the City of Los Angeles and 2 projects in the County of Los Angeles. In the RP-DEIR, the list of other developments is much shorter and includes only three projects: Canyon Hills, the Foothill Commerce Town Center, and the Canyon Parks Home developments. The Traffic/Transportation section of the RP-DEIR needs to include an updated list of related projects, accounting for all related projects that will affect cumulative traffic trip counts.
- As far back as 2006, then Councilmember Wendy Greuel recognized that traffic flow at the intersection of Big Tujunga Canyon Boulevard and La Tuna Canyon Road as being “near capacity” (Council Motion 06-2413). This determination was made prior to knowing the vehicle trip impacts of 200+ homes of the entitled (though not yet constructed) Canyon Hills Project and without consideration of the recently applied for 242 home Canyon Park Project. In addition, there are 30 acres adjacent to 6433 La Tuna Road now for sale which likely will be developed and which will add its share of vehicle trips to the Tujunga Canyon Boulevard and its intersection with La Tuna Canyon Road.

Chapter IV. ALTERNATIVES:

2009 DEIR Alternatives

The 2009 DEIR prepared for the project analyzed four project alternatives: (1) No Project; (2) All Residential Townhomes; (3) Mixed Use Residential and Retail; and, (4) Mixed Use Residential/Retail/Office. The DEIR identified Alternative 2 (All Residential Townhomes) as the “environmentally superior” alternative since it created less impacts than the other alternatives studied at that time (with the exception of the No project Alternative) and still met the project’s objectives. However, Alternative 2 is similar to the other alternatives studied in 2009 (with the exception of the No Project Alternative) that resulted in project impacts that cannot be mitigated to a level of insignificance. Primary among these impacts are aesthetics and the project’s impact on scenic vistas in the area.

The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan seeks to preserve the view sheds of the San Gabriel and Verdugo mountains. The proposed development described in Alternative 2 clustered townhomes on the eastern periphery of the project site and retained the golf course. This alternative ignores the unmitigated aesthetic impacts it would cause. Neither the project nor Alternative 2

described in the 2009 DEIR would have been consistent with the Specific Plan because they would both drastically alter the view shed of the area from La Tuna Canyon and the I-210 Freeway (both are Scenic Highways) and from other viewpoints surrounding the project site.

2015 RP-DEIR Alternatives

The 2015 RP-DEIR retains the four alternatives discussed above and adds two new alternatives: Existing Zoning Equestrian Estates Alternative and Walkable Village Alternative (Preferred Project). In regards to the Walkable Village Alternative (or the Preferred Project) we ask why this is being presented as an Alternative when it actually is the proposed project. The Lead Agency should have revised the 2009 DEIR to include this new alternative as The Project. Then, the entire EIR (all sections) should have been revised to address the impacts of the new project and re-circulated for public review. The City/Applicants have proposed a “short cut” to the environmental review of this project by presenting the preferred project as an alternative rather than recirculating the entire DEIR.

In addition to the foregoing, the 2009 DEIR provided detailed color graphics that clearly depicted three of the four alternatives presented in the DEIR. The 2015 RP-DEIR does not include graphics of this kind in its discussion of either for the two new alternatives. Consequently, it’s not possible to understand the full nature of these alternatives and their impacts on the environment.

Alternative V - Existing Zoning Equestrian Estates

Our comments on this alternative include the following:

- The Existing Zoning Equestrian Estates Alternative is treated in the RP-DEIR incompletely. Figure IV-1 (partial site plan) is inadequate in describing the alternative or how it would be implemented on the project site. A complete site plan is required for this alternative.
- We recommend changing the zoning of these 12 acres of developable area on the project site to RA that would still retain the status of “Equestrian Estates” and would make a few additional units available to the developer. Additionally, it would be imperative that the land also be granted K-Overlay status to preserve equestrian uses on the property. This will assure the community that the required 2,288 sq. ft. equestrian set-aside in accordance with the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan is honored. It is important to the community to provide strict rules and enforcement against the construction of McMansions on large lots - a serious potential threat without the K-Overlay status.
- Development of this alternative, as presented in the RP-DEIR, would cause a massive amount of landform grading required in comparison to the other alternatives. No development should take place on any portion of the Project Site at greater than 15% grade to reduce the potential for erosion, loss of topsoil and greater risk of loss/injury to people/structures. At the very least, 20 acres of the steeper hillsides should remain undeveloped. Some level of

native habitat, so much part and parcel of the La Tuna Canyon, must be preserved.

- This alternative could easily be redesigned to encourage the protection of trees. Tree replacement can occur along the Project Site perimeter and along internal streets. In addition, the alternative should include recreational amenities such as setting aside one 20,000 sq. ft. lot with the greatest density of protected/mature trees for every 25 developed Equestrian Lots. That should allow for three such “pocket parks” each of which may have enough room to provide a recreational opportunity.
- The RP-DEIR argues that the impacts of this alternative are greater than that of the Walkable Village alternative because the amount of disturbance would be far greater than the clustered housing in the Walkable Village. However, little or no credit is given to the Equestrian alternative for its benefits, which include less housing density on the site and therefore less vehicular trips generated by the alternative and less traffic impacts.
- The Equestrian Estates Alternative would add half the mobile as well as operational emissions of the other alternatives with the exception of the “No Project” alternative which would be expected not to change emission levels at all.
- Whether in drought or in an El Nino cycle, water run-off is a significant impact. The Equestrian Estate Alternative has far greater potential for water retention and percolation (a precious commodity in drought and a protective commodity during El Nino) as compared to the other alternatives with their far greater impervious surface areas (with the exception of the “No Development” option which would have even greater water retention and percolation capability than the Equestrian Estate Alternative).
- The Community Plan does not include policies that foster clustered development on the project site. San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan does not include policies that promote clustered housing. In fact, the word “clustered” doesn’t appear in either document. While clustering housing to preserve open space is a laudable design concept, the scale of this project and its density are not a good fit for this location. Where is the reduced-scale clustered housing alternative?
- San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan includes policies regarding equine keeping and the preservation of oak trees, none of which is adequately analyzed for this alternative in the RP-DEIR.

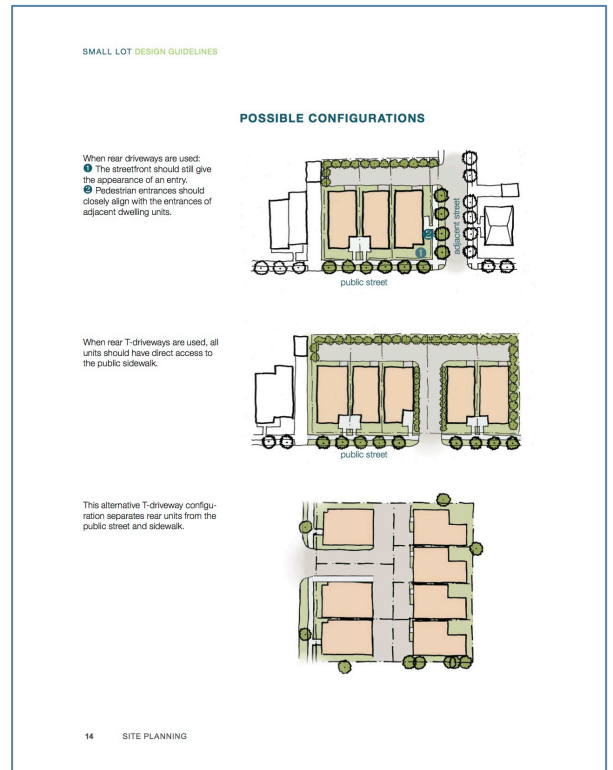
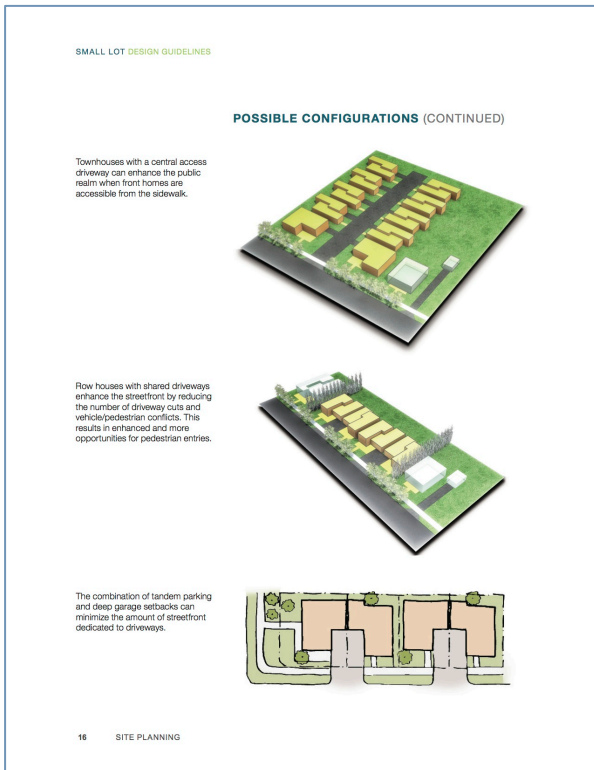
Alternative VI - Walkable Village Alternative (Preferred Project)

Our comments on this alternative include the following:

- This project alternative violates **Intent** of Small Lot Ordinance. The Small Lot Ordinance was intended as an innovative housing tool to encourage the development of alternative fee- simple homeownership in areas *zoned* for multi-family and commercial uses. The Ordinance creates incentives for *infill*

residential development to spur more housing production. As such, it was never intended to be used as a tool to promote dense housing on properties similar to the VHGC. The City's Small Lot Design Guidelines clearly depict the intended use of the ordinance, namely to allow owner-occupied infill housing to be constructed on narrow lots in already developed neighborhoods.

Diagrams from the Guidelines that depict this intended use of the regulations include the following:



As depicted above, the intent of the ordinance was to encourage infill residential development (fee-simple home ownership) on existing City streets with properties having access from those streets and from public alleys, if available. The proposed project does not comply with these guidelines. It perverts the intent of the ordinance by using its provisions to create fee-simple home ownership small lots in a clustered housing project that is highly dense and inappropriate for the proposed location.

- When the Small Lot Ordinance was adopted, it was not anticipated that large housing developments, such as the proposed project, would be utilizing the Small Lot process. It was intended for infill developments, so no provisions were required for larger projects. A series of amendments are being proposed to the Ordinance in which a subdivision creates a community of small lots involving 20 or more Small Lot Homes (“Small Lot Community”). These projects will be required to provide open space, bike parking, and additional design features. Guest parking will be required on site for projects creating 8 or more Small Lot Homes. These amendments are not discussed in the RP-DEIR, nor is there a comprehensive analysis of the proposed project’s

adherence to these new regulations.

- The visual perspectives of the project site for Alternative 6 (taken from 7 different viewshed areas that surround the project site) do not appear to be publicly available. View simulations that are accessible are from the 2009 DEIR Aesthetics section and those were for a 229-unit project. Therefore, it is not possible to comment on the aesthetic/visual impacts of this current alternative.
- Many of the measures described to be implemented to address the aesthetic impacts of the Walkable Village Alternative are included Project Design Features (PDF's). It is unclear whether these are actual mitigation measures for the Walkable Village Alternative. The original 2009 EIR included 15 mitigation measures addressing aesthetic impacts of the project. Will these mitigation measures apply to the Walkable Village Alternative? Even with their implementation, the EIR concluded they would be insufficient in addressing aesthetic impacts without a complete redesign of the project.
- The Walkable Village Alternative purports to meet community recreational needs by setting aside 28.4 acres of open space for public use and by providing project trails "that connect existing and proposed trail segments to lookouts and scenic vistas." However, the RP-DEIR does not provide a figure depicting these new project trails, nor does it describe who would own and maintain them. Furthermore, it's specious to argue that either of these two "features" of the project compensate for the loss of the golf course. In fact, *most of the recreational amenities of this project seem to be meant for use only by future residents of the project.*
- Many of the impacts analyzed in the 2009 DEIR for the original project (229 units) are the same for the currently proposed project (Preferred Project Alternative) - 221 units. Both site plans concentrate residential development in the southeast corner of the project site and have access from Tuna Canyon Road. As such, neither site plan resolves or mitigates the two significant and unavoidable impacts associated with this current project: *the loss of a major recreational resource for the community and the unmitigated and intrusive interruption of existing viewsheds in the project area caused by the project.*

Conclusion

This RP-DEIR is woefully inadequate, bifurcates the CEQA review of the project, and offers either inadequate or deferred mitigation for project impacts. The DEIR and RP-DEIR preparers should be instructed to substantially revise it to include a more substantive analysis of project impacts, and to provide additional/revised mitigation measures. Specifically, the DEIR and RP-DEIR preparers and Lead Agency should:

- Re-circulate the entire DEIR and not just the sections chosen by the Lead Agency (cultural resources, transportation/traffic, updated alternatives, and greenhouse gases (new)). This will give newer community members an opportunity to review the whole of the project and its impacts and make comments.

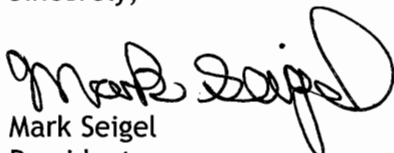
- The baseline for analysis of impacts has shifted since 2009, requiring that all sections of the DEIR be updated.
- The “new” 221-unit project should be addressed in a recirculated DEIR as The Project, not as a Project Alternative.
- Manual traffic counts (2015) are required to accurately depict and analyze existing traffic and intersection operating conditions, existing conditions with project, and project with cumulative projects.
- The Air Quality section of the 2009 EIR needs to be updated and recirculated for public review (making it’s content consistent with the more recent Greenhouse Gases section of the RP-DEIR).
- This RP-DEIR does not adequately address the proposed TCDS memorial site and the needed mitigations. The RP-DEIR authors must improve these mitigation measures, eliminate deferred mitigation, and provide measures that secure the TCDS memorial site and its future.
- The Traffic and Transportation section in the RP-DEIR does not adequately address the future of this project’s impacts on the surrounding streets. It must readdress the future of this project’s impacts on the surrounding streets and specifically provide mitigation for the project’s impacts to the intersection of Tujunga Canyon Boulevard and Pali Drive.
- The project applicants have subverted the intent of the Small Lot Ordinance by attempting to apply its provisions to a large-scale, clustered-housing residential project. They need to use the ordinance appropriately.
- The Walkable Village alternative needs to address and mitigate the recreational resources and aesthetics impacts it causes.

Finally, there is no compelling public benefit that would result from the approval and construction of this project:

- There is no affordable housing component in this project.
- There are no major infrastructure upgrades being proposed that would benefit other properties nearby.
- There is no alternative active recreational feature of this project that can compensate for the loss of the golf course.
- *We find no basis for the adoption of findings that would support a conclusion that the project’s benefits outweigh its negative impacts.*

As proposed, this project (at its current density) will further degrade the quality of life of our residents who live and commute in this area and will rob them of an important recreational asset - the Verdugo Hills Golf Course. No EIR can truly gauge or accurately depict the nature of this loss to our community.

Sincerely,



Mark Seigel
President
Sunland-Tujunga Neighborhood Council

Attachments

- A. Sunland-Tujunga Neighborhood Council, Land Use Committee, The Verdugo Hills Golf Course Project DEIR, Correspondence, August 19, 2009.
- B. Tuna Canyon Detention Station Coalition (Coalition), Ms. Nancy Kay Oda, Dr. Lloyd Hitt, Comment Letter, dated January 30, 2016.
- C. Little Landers Historical Society, Bolton Hall Museum, Correspondence, Harrold Egger, President, January 25, 2016.