

Environmental Impacts and the Verdugo Hills Golf Course

When one is commenting on environmental impacts and how they affect our community, it is easy to become confused by the scientific and technical speak. Here are some plain English explanations for the possible impacts from development of the Verdugo Hills Golf Course. The L.A. Department of City Planning has invited you to comment on these impacts. **Remember, you are the local expert--not the preparers of the Environmental Impact Report, or even the City of Los Angeles. You live here. You know this area better than anyone else. This gives you the right and privilege to comment and be taken seriously. All comments will be collected as part of the official record and responded to by the preparer of the Draft EIR. So, please comment as an individual and as a group.**

AIR QUALITY: Grading large amounts of soil can create considerable amounts of dust and diesel fumes from heavy equipment, as well as other airborne debris during the construction period (estimated at two years in this case). After development completion, the additional amount of automobile exhaust from several thousand car trips per week will impact the air quality.

BIOLOGICAL RESOURCES: The golf course area was once part of the greater Verdugo Mountains. As a result of being cut off by the freeway, species of animals and plants that are threatened or endangered--such as the Horned Lizard, Spineflower, Nevin's Barberry and some species of Dudleya, among others--may still exist at the golf course. Additionally, there are several hundred mature, California Live Oaks, Sycamore and other trees that will be cut down or removed as a result of the grading and building operations. To what extent will the City of Los Angeles protect these heritage tree species in perpetuity (for all time)? What protection will they receive from the state level? Also, sightings of large predators such as mountain lions, bobcats, eagles, etc., are of significance, as is the lost potential for habitat restoration.

CULTURAL RESOURCES: There is evidence that the golf course could have been home to part or all of Wiqanga, the Gabrielino-Tongva village that existed in this end of the Crescenta Valley, and artifacts may have been found by various workers at the course. The onsite spring gave rise to habitation near to or on the golf course site, and provided a water source for the Native people in drier months. It is known that Las Bassas Canyon--the name of the canyon that was filled by the 210 freeway construction--was the passage for the missionary fathers as they traveled from the Mission San Gabriel to Mission San Fernando, and the spring was probably a well-known water source for them. Pioneer Phil Begue commented on the "Old Padre Trail which was the Old Indian Trail before," and such documentation is archived at Bolton Hall. During the Great Depression the Civilian Conservation Corps had a camp on the golf course site called "Tuna Camp." It later became one of the first internment depots in California for people of Japanese, German and Italian descent. After WWII, Tuna Camp reverted back to a CCC camp before it was sold to become the golf course in 1959. This rich history of the golf course site would be compromised with the proposed development.

GEOTECHNICAL RESOURCES: The geology of the golf course site can either support 229 structures, or it cannot. According to local geologists there is a fault that runs at the base of the northern side of the Verdugo Mountains and continues very close to or through the golf course

itself. Additionally, with the proposed amount of grading, the homes above the course should be concerned with the safety of the slope below them. Once the development is built, the safety of all the slopes (cut or fill) must be assured. There is a spring that flows on site almost year-round, giving rise to a subterranean structure of some import. Ultimately, geologic hazards that exist on site, or that result from excavation and grading, must be identified. Additional areas of concern are watershed, as well as water infiltration into the soil and underground aquifers. The addition of 229 structures will add a significant amount of pavement, essentially eliminating water infiltration and creating runoff—yet another environmental issue.

HAZARDOUS MATERIALS: During the construction process hazardous materials may be used, transported, and stored on site. Among those materials would be fuels for heavy equipment, solvents, and paints. The developer is required to maintain safe handling and disposal of such substances, and the L.A. City Fire Department is charged with regulation. Hazardous material spill is a serious concern with a potential for human contact, wildlife contact, and groundwater contamination.

LAND USE AND PLANNING: The determination of land use impacts created by the development of the Verdugo Hills Golf Course property starts with zoning and the L.A. City General Plan. The zoning of the golf course is in question since it does not match the General Plan designation. The General Plan and the Community Plan agree with each other but the ZIMAS maps do not agree with either the GP or CP. Thus, the confusion grows stronger when the zoning ordinance kicks in which calls for a greater density which agrees with the ZIMAS maps but then does not agree with the General Plan and Community plan. The State of California says these two must agree but of present date, that outstanding difference plainly exists. So, what is the actual zoning of the golf course? This has yet to be adequately answered. Keep in mind that the developer's business is SPECULATIVE DEVELOPMENT. In other words, the developer must convince the L.A. Department of City Planning and the L.A. City Council that a change of zoning—for 229 houses or otherwise—is: 1) good for the community; 2) consistent with the General Plan; and 3) consistent with the Community Plan. The Planning Board and the City council will listen to the desires of the community, and if opposition to the development is loud and clear the zoning change will most likely not be allowed. Five findings *** (See attached)

The area around the 210 Freeway and the Verdugo Mountains is considered part of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. How does a large housing development figure into this designation, or does it violate it altogether? Will the City of Los Angeles enforce the new slope density formula? The owner/developer of the golf course has filed a "lot-line adjustment" application, which would divide the property into two parcels--hillside and golf course. How will that affect slope density? How will this development fit into the General Plan? If the housing crisis in LA really does not exist, then isn't this a case of "build it and they will come"?

NOISE AND VIBRATION: Generally speaking, this impact refers to the construction period (probably two years) and the resulting noises and vibrations associated with grading, demolition and building, and their effect on surrounding neighborhoods, schools, healthcare facilities, convalescent homes, churches, etc. Excessive, concentrated vibrations can affect structures.

POPULATION AND HOUSING: The Southern California Association of Governments (SCAG) uses census information to predict future populations and housing needs. Following the 2000 census, SCAG estimated that the city of Los Angeles would increase its population by 400,000 by 2025. This number is actually a reduced number (twice removed). SCAG's census findings have been re-interpreted into a projected need for housing and affordable housing. Some say there is a housing crisis, which then stimulates decisions within L.A. City Council and the L.A. Planning Department to approve large and small scale housing developments without the appropriate study of actual need, and without the use of EIRs and other relevant considerations. The small lot subdivision is an outgrowth of this thinking, which removes setbacks, parking, landscape, and other requirements in an effort to fit in more housing; the developers of the Verdugo Hills Golf Course are asking for this small lot subdivision designation. Consider the following relevant questions: What are the ACTUAL projected housing numbers regionally and for Sunland-Tujunga? What is the REAL need for more housing? Is the application for Small Lot Subdivision (SLS) legal in this project? Why the need for SLS? How much of this project is actually affordable housing? What is the anticipated median price for these homes, and can those who need it actually afford the lower cost versions? What about the cumulative impact of this development with the Oakview, Canyon Hills, and Duke developments?

POLICE, FIRE AND EMERGENCY RESPONSE: Will L.A. City Fire and/or Police Departments be able to provide services to the proposed development, in addition to existing neighborhoods? Each department has a ratio of police/fire responder to number of residents; is this ratio currently adequate, and will it remain adequate? How will increased traffic affect emergency response times? Will this development--along with the proposed Canyon Hills and Duke Developments, and 25 Oakview Convalescent condominiums on Tujunga Canyon Boulevard--affect the City's Insurance Services Office ratings? (ISO determines insurance rates based upon the efficiency of response.) Will the proposed development necessitate a new fire station, and who will pay for it? Does the City's current long-range emergency response plans provide for future developments of this size in this area? Will the emergency water source be adequate? Will a new water storage facility be required, and who will pay for it?

RECREATIONAL RESOURCES: L.A. City and surrounding communities are drastically park poor. Los Angeles is often listed as having one of the worst ratios of developed parkland per 1,000 residents among the nation's large cities. The Verdugo Hills Golf Course has historically been a family-friendly, affordable recreational resource in our midst. A prime opportunity exists to turn it into a regional or community park for all residents to enjoy. The ancillary property portion of the golf course offers strong opportunities for the addition of tennis courts, playgrounds, a community room, as well as passive and active park features such as an exercise course, hiking trails, a river walk, etc. What does L.A. City's General Plan Recreation Element say about the need for local parks and their possible acquisition? What are the citywide and local needs for developed recreational resources, and how do they figure into future planning? If the Verdugo Hills Golf Course were to become a community or regional park, would it be part of a larger Rim of the Valley Corridor or park system? Could this park help satisfy the needs of L.A. City Park and Recreational planning? Could such a park help fulfill Mayor Villaraigosa's recently announced vision to create 35 new parks by 2010? There is, without doubt, a severe deficiency for developed parklands within the City of L.A., the

community of Sunland-Tujunga, and the Crescenta Valley (including City of Glendale and L.A. County's unincorporated La Crescenta/Montrose).

SCHOOLS: The proposed development could potentially bring 229 new families, generating large numbers of new students and the potential for overcrowding in local schools. How will this affect teacher-to-student ratios? How will this new capacity comply with state mandates to reduce class sizes? If the area schools cannot handle the additional students, is busing a possibility? Will schools adopt year-round attendance calendars to handle the additional load? Will these students attend LAUSD or GUSD schools? Consider the cumulative impact when Canyon Hills (a half a mile away) and Oakview condominiums (across the street) are built. Consider private schools and those that currently bus their students (Verdugo Hills High School). Consider students getting to and from school from this site, as well as the possible need for a new school in this vicinity.

TRAFFIC AND TRANSPORTATION: Much has been said about this impact already. If you drive or live near Tujunga Canyon Boulevard, you realize that existing traffic is currently over capacity. The City has expressed little hope for relieving this traffic problem, so how can they allow an additional large-scale development of 229 houses? How many car trips a day will be generated by such a development, and how will it impact the immediate vicinity and distant neighborhoods? Consider the added traffic from the future Canyon Hills development, as well as the Oakview condominiums. Will these developments incorporate mass transit to help mitigate increased traffic problems, and how will these new traffic loads affect pedestrians? How will increased traffic affect the nearby Montessori school on Lowell, the Armenian school on Honolulu, and automobile access to the 210 freeway? Since the golf course is one block from the City of Glendale and only a mile from unincorporated L.A. County, how will those cities be impacted? What about emergency ingress and egress? What impact will increased traffic from development have on your quality of life? An in-depth, thorough, community-based traffic study must occur before any serious discussion of zoning change can begin. During construction of the proposed development, a large amount of heavy equipment will access the site, as will enough dump trucks to import 100,000 cubic yards of soil. Consider other future developments beyond the Verdugo Hills Golf Course, Canyon Hills, Duke Development, and Oakview.

UTILITIES: Existing infrastructure is frequently affected by large developments, requiring upgrades and up-sizing of pipes and wiring. Specifically, this impact deals with electrical services, natural gas, water and sewer. In these days of water conservation, do these large developments make sense? Will the proposed development strain existing infrastructure? Should a new development be required to use reclaimed water for non-potable uses? Will the cost of new infrastructure get passed onto the taxpayer? Is there adequate water supply for this development? Will the project generate a demand for electricity or gas that exceeds local supply? How will current services be affected, and what can be expected in terms of interrupted service during and after construction? How will local neighborhoods be protected from resulting impacts, such as low water pressure? How will construction impact traffic during times of street excavation? What will be the energy consumption of this large development? Will the developer's architects and engineers propose energy-saving design, and will the City or utility companies demand it? How will this project affect demands during times of peak usage and

emergencies? What measures will be taken to reduce inefficient consumption of energy during and after construction? Will the project use careful siting, orientation and design to minimize energy usage?

VISUAL RESOURCES: What is the visual and aesthetic impact of this development? The golf course has been part of the regional character of this community for many decades, and has not changed significantly since it was a CCC camp and then a golf course. The golf course provides pleasing views from the surrounding streets and 210 Freeway, and provides a quality visual experience for golfers using the course. All this will change when development occurs. These impacts are largely subjective, but they are real per CEQA standards, and are significant when one considers the history and longevity of the site. The golf course provides natural beauty and open space that has been a hallmark of this community. Is this not the reason why many of us moved here? Consider the stark change with the removal of trees, the excavation and grading of cut and fill slopes, and the addition of 229 new structures. Will the developer provide a realistic photo-simulation of the proposed development? Will the project significantly affect the existing landforms and existing trees? Will the development seriously affect the views from neighboring streets and highways? Will the project introduce new light and glare sources? Is the project designed to fit the natural terrain upon which it is constructed? Will the natural features, such as stream channels, habitat areas, trees and vegetation, adequately be retained to preserve beauty and prevent erosion?

WATER QUALITY: Generally, this category deals with water resource issues, such as supply, drainage, storm water runoff and water quality. How will groundwater resources be impacted? Since this is a hillside area, an accurate drainage study of peak rainfalls should be conducted. What will be the effects of flooding and erosion on neighboring properties during the construction phase and thereafter? How will the maintenance of drainage facilities be handled once the project is complete? Will the proposed drainage system be adequately designed, and for what capacities? How will the new development affect the existing storm water drainage system? How will runoff be handled during construction? How does the necessary brush clearance that will be required on this site affect runoff? The addition of 229 houses will include considerably more pavement than what currently exists, which will cause water runoff into storm drains; can the runoff be channeled to stay on site, thus helping to recharge ground water storage? What will be the National Pollutant Discharge Elimination System (NPDES) requirements? The proposed development on this site will essentially eliminate the watershed that the golf course now provides; what effect will this have on the region?

CUMULATIVE IMPACTS: The development of the Verdugo Hills Golf Course property would be a considerable loss on many levels, especially when considering the impacts on the region as a whole. The Oakview Convalescent Home (across the street) is slated to be re-developed into condominiums, in addition to the planned Canyon Hills and Duke Development projects further up on La Tuna Canyon Boulevard. All of these developments will have a cumulative effect on our community and quality of life. This CUMULATIVE IMPACT must be considered before any zoning changes occur and before the L.A. Planning Department deems it admissible. Environmental impacts can reach far and wide, which is why we stress that you involve your respective cities/municipalities in this effort. City of Glendale is one block away from the Verdugo Hills Golf course, while Unincorporated L.A. County is a little more than a mile away,

and both municipalities should be seriously concerned about the potential impacts on their communities (i.e., traffic, schools, municipal services, loss of a significant recreational resource, etc.). How will Cal Trans be affected? What will be the overall impact to the existing operating services, systems, and quality of life in the greater community and region? A solution with the least environmental impact would be to maintain the golf course as it is.

PROJECT ALTERNATIVES: There are alternatives to the proposed 229 structures, with all of its impacts. Strangely enough, the Notice of Preparation does not list the loss of recreation or cumulative impact as considerations in the Environmental Impact Report! What are they thinking? CEQA requires that a project's environmental impact report consider alternatives to the proposed project. Alternative examples might be projects that are smaller in scale—a half, a third, or an eighth of the housing structures—or projects that employ far less grading and different designs, that have no impact on traffic, that comply with existing zoning, that preserve the existing trees. Finally, consider the option of simply preserving the golf course with its potential to be a regional park for all community residents.

Remember, you are the local expert. Your commentary will determine the extent of the exploration of environmental impacts. Comment on as much as you feel you can, as an individual, as part of your homeowner's group, hiking group, neighborhood association, service group, as a professional or official of your company, BUT DO COMMENT by the 28th of December to:

**David Somers, Environmental Review Coordinator
Environmental Review Section
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012**

Thank you and SAVE THE GOLF COURSE!

VOICE

Zone Variance

- 1. The strict application of the provisions of the Zoning Ordinance would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the zoning regulations.**

- 2. There are special circumstances applicable to the subject property such as size, shape, topography, location or surroundings that do not apply generally to other property in the same zone and vicinity.**

- 3. Such variance is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other properties in the same zone and vicinity but which, because of such special circumstances and practical difficulties or unnecessary hardships, is denied the property in question.**

- 4. The granting of such variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the same zone or vicinity in which the property is located.**

- 5. The granting of the variance will not adversely affect any element of the General Plan.**