



MT. WASHINGTON

A S S O C I A T I O N

21 February 2017

via email (planning.envreview@lacity.org) and USPS

Ms. Karen Hoo
Environmental Review Coordinator
Environmental Review Section
City of Los Angeles
Department of City Planning
200 N Spring Street, Room 750
Los Angeles, CA. 90012

Re: ENV-2015-2354-EIR / Comments on Draft Environmental Impact Report for Abode at Glassell Park Project

Dear Ms. Hoo:

On behalf of the Mt. Washington Association, which represents all residents who live within the boundaries of the Mt. Washington/Glassell Park Specific Plan, I am submitting these comments and concerns on the Draft Environmental Impact Report ("DEIR") for the proposed Abode at Glassell Park Project ("Abode").

As you know, Abode proposes to build 32 homes on approximately 4 acres in the area of open space known by residents as Walnut Canyon. Walnut Canyon is one of the largest remaining areas of open space on the Glassell Park hillsides.

As presented, the DEIR submitted by Abode is wholly inadequate and still needs to address the following:

PROJECT DESCRIPTION IS UNCLEAR

A. The haul route that is mentioned is "anticipated" but not clearly identified as the one to be used. How is Abode going to address the incredibly narrow streets, which are even more hazardous with vehicles parked along the haul route, which is common practice by residents?

- next page -

B. These 32 homes would be situated in a canyon with rolling hills. Will retaining walls be required? If so, how high will they be and where will they be? Which homes will require them?

C. Will this proposed project follow the planning laws governing by hillsides - specifically the Mt. Washington/Glassell Park Specific Plan and the Hillside Ordinance – or will variances be asked for? None of this is made clear in terms of side yard setbacks, height requirements, aesthetics, etc.

D. The impacts of Abode's construction on existing homes. Will current residents be required to have the roadways widened to accommodate traffic during and after construction? How will they be affected both during and after this process?

TRAFFIC ANALYSIS NEEDED

The roads on these Glassell Park hillsides are incredibly narrow, they are substandard and not properly engineered for heavy vehicles or for heavy traffic. Basically, they are just asphalt placed on top of dirt paths. At its widest, Haverhill Drive is only 18' - even worse is Brilliant Drive, which is only 14'. And again, this is the norm on this hillside, so the same concerns affect the streets that serve as potential haul routes: Cazador, Kinney, Lavell, Hines are all narrow, substandard, winding streets that are not properly engineered. In fact, some of these roads are beginning to fail. This is only exacerbated by the frequent trips by heavy trucks, which only further degrade these roads. Not only are these roads degraded, substandard, not engineered and narrow, but in many instances, they are also steep with sharp curves. There are many instances where trucks get stuck or have overturned (SEE ATTACHMENT A). All of this needs to be addressed in the EIR.

In addition, with the rampant construction this neighborhood has already been subjected to over the past two years, there have been multiple times where residents have encountered speeding construction trucks that have come close to causing head-on collisions with vehicles on these narrow streets. This is especially concerning if the trucks use streets which have blind curves as part of their haul route, such as there are on Cazador on the way to Brilliant Drive.

Because there are limited sources of ingress and egress off of the hillside, the addition of construction of another 32 homes is dangerous, especially if there is a need for emergency vehicles, such as fire, ambulance service or police, during construction hours.

Currently, the following projects are all either under construction or approved for construction, based on CNC reports made available, permits listed on the Los Angeles Department of Building & Safety site and/or presentations made by developers to the Glassell Park Neighborhood Council's Land Use & Planning Committee:

Barryknoll Dr: 3701, 3854, 3860, 3861, 3864, 3865, 3870, 3871, 3876, 3880, 3884, 3919
(In addition, the developers at 3888 & 3900 have started illegal grading or construction without permits, which has been reported to the council office and Planning)

Brilliant Dr: 3750, 3754, 3756, 3762

- next page -

Cazador St: 3835

Division St: 3720 & 3714

Hines Dr: 2512 & 2520

Kinney Circle: 3620, 3624, 3628

Kinney Place: 3611

Kinney St: 3564, 3577, 3610, 3663

Lavell Dr: 3553 & 3761

Moss Dr: 2266

Parrish Dr: 3606, 3608, 3610, 3614, 3616, 3620, 3624, 3628

Richardson: 3609 & 3615

Yorkshire Dr: 2385, 2391, 2397, 2401, 2409, 2501

Abode's DEIR only has 6 of these projects mentioned; so the DEIR is vastly inadequate in representing the full picture of development that is occurring - and as it relates to the cumulative impacts (environmental, traffic, biological, health concerns, emergency response, schools and parks, infrastructure).

So in addition to Abode's 32 homes that are being proposed, by our account, another 40-50 homes are under construction or in development. As I'm sure you know, this is what is legally known as a "cumulatively considerable" impact. This needs to be thoroughly analyzed by Abode and is completely ignored in their current DEIR.

Abodes' DEIR fails to address any of these issues and does not provided an accurate traffic analysis.

BIOLOGICAL ANALYSIS NEEDED

Longtime local residents have told us that in the early to mid-1960s, Walnut Canyon was used by a company called Deep Rock Water (comparable to today's Sparkletts) to get water from the springs underneath the canyon. This important information suggests that a full geological survey needs to be done as part of this EIR to see if there is in fact, an aquifer located on the property.

- next page -

The Walnut Canyon section of the Glassell Park hills is home to walnut woodlands and coastal sage scrub. It is one of the wildlife corridors that connects the LA River with the Arroyo Seco and as such, supports such species as coyotes, bobcats, possum, skunk and other animals that use this "link" of connectivity (ATTACHMENT B). Walnut Canyon is also a site for various birds, insects and butterflies, as outlined in the Cooper Ecological report, commissioned by the MRCA / Santa Monica Mountains Conservancy,

While Abode acknowledges there are dozens of protected Southern California Black Walnut trees, they completely ignore the impact this development would have, which, by law, must be addressed. Southern California Black Walnuts are a protected species and to find a walnut woodland of this size and the abundance of mature species found in Walnut Canyon is incredibly rare. Southern California Black Walnuts are difficult to propagate, so for Abode to say they will plant 1 gallon trees does not account for how difficult it is for sapling Southern California Black Walnuts to survive, especially amidst the hardscape of new roads, houses and potential retaining walls as well as the chemicals that will leech into the ground from this new development, which makes survival for these trees even more difficult.

These stands of Southern California Black Walnuts are used by the dozens of species of birds and other wildlife as part of their migratory path. Owls also use these trees for nesting. No amount of 1 gallon walnut trees can mitigate the loss of these large, mature trees for habitat. To keep these species from disappearing from Walnut Canyon, larger, more mature Southern California Black Walnut trees would need to be added.

The City of Los Angeles has a Protected Trees Ordinance, and Southern California Black Walnuts are among the protected species. In April of 2015, Abode cut down a number of Southern California Black Walnuts, which is a violation of that ordinance (ATTACHMENT C). In fact, the penalty calls for a maximum of up to a 10 year moratorium on building if protected trees are destroyed (as they were in this instance). Nowhere in this DEIR does Abode address this violation - the illegal removal of protected species. And, Abode's tree report of August 2016 does not address this at all, so it is an inaccurate, misleading document.

In Brentwood, a similar situation occurred and the City of Los Angeles fully enforced the ordinance; a building moratorium was put on the site because of the violation by the developer. (<http://www.latimes.com/local/lanow/la-me-ln-brentwood-trees-chopped-20160624-snap-story.html>)

The Mt. Washington Association feels our neighborhoods in Northeast LA must receive the same type of enforcement of destruction of protected trees as Brentwood - and as in this case, the same type of violation has occurred. There should be environmental justice that is equal for all communities in the City of Los Angeles, and enforcement of laws in the City should be meted out equally.

So what's good for Brentwood should be good for Glassell Park - Abode should be held to the same standard as the developer in Brentwood: a moratorium should be placed on this development due to Abode's blatant and clear violation of the City's Protected Trees Ordinance.

- next page -

Glassell Park, which has no park space whatsoever. Abode must disclose and mitigate this loss of park space in its EIR.

EMERGENCY RESPONSE ANALYSIS NEEDED

Abode's DEIR inadequately assesses the impact on fire, ambulance and police services. As mentioned above, access by LAFD & LAPD is an issue, especially during construction. The Glassell Park hills are brush-heavy and fire season is always a concern. Due to the recent heavy rains, brush clearance will be a major concern for this hillside neighborhood. Lack of access for emergency vehicles can mean the difference between minimal fire damage and significant losses of property and lives.

As mentioned earlier, the roads here are narrow, not engineered and are sub-standard. The DEIR does not adequately address these safety issues. And, by not addressing them, this neighborhood will be put in a potentially dangerous situation not dissimilar to the Oakland hills fires that occurred in October of 1991.

Even in a non-fire scenario, response times are critical for emergency vehicles, especially with the number of elderly and home-bound residents on this hillside. A few minutes can be a matter of life or death if medical service is not provided. Again, this issue is not addressed in the DEIR and needs to be. It cannot be deferred as Abode does in the DEIR.

POPULATION INCREASE IN DEIR IS INSUFFICIENT

Abode's DEIR woefully underestimates how many residents will live in these proposed 32 homes. They claim 2.74 persons per household, while a more accurate figure of 3.49 is truly representative of population rates for this area. This miscalculation means there will be greater traffic on these substandard roads, greater use of inadequate infrastructure (water, sewer, utilities), increased attendance at schools, etc. Like their misrepresentation of the number of construction projects in the area, their number is a major underestimation and wrong - the real numbers represent a significant cumulative impact that is not adequately addressed by Abode in their DEIR and will create public service deficits, which, again, is not adequately addressed in the DEIR.

SCHOOLS & PARKS ANALYSIS NEEDED

As mentioned, Abode's DEIR miscalculates the potential number of residents and does not accurately account for the cumulative development on the Glassell Park hillside. The DEIR also underestimates the number of students at 8 for the 32 homes. Again, a more realistic number needs to be included and assessed, considering the demographics and representative population rate in this region. The EIR from Abode must address this inconsistency and provide realistic projections and figures for the neighborhood.

With regard to parks, Glassell Park is without any parks in its hillside areas. Contrast that to neighboring Mt. Washington, which has Elyria Canyon, Heidelberg Park, Kite Hill and Moon Canyon as open space for passive recreation and hiking.

- next page -

The Abode site contains a hiking trail that has been used by residents for at least 40 years; this project would eliminate this unofficial park space used by residents who not only live nearby, but others who live in the more densely populated, economically and culturally diverse parts of Glassell Park, which has no passive recreational park space. Abode must disclose and mitigate this loss of park space in its EIR.

LAND USE LAWS ANALYSIS NEEDED

The DEIR does not address how it will comply with the Mt. Washington/Glassell Park Specific Plan, the Hillside Ordinance and the Protected Trees Ordinance (which we know Abode has already violated). Such issues as side yard setbacks, height, floor area ratio, retaining walls, architectural variety & design diversity all need to be addressed.

Again, the DEIR needs to also address issues of infrastructure (sewer, water, utilities), inadequate, substandard roads, and compliance to the Northeast Los Angeles Community Plan, all of which are either not addressed or inadequately addressed due to the use of inaccurate data (citing of 6 projects vs 40+; inaccurate population calculations; inaccurate student calculations).

AGING INFRASTRUCTURE ANALYSIS NEEDED

Nowhere in the DEIR does Abode address the aging wastewater and water pipes on the Glassell Park hillsides. This project will have a significant impact and this is underscored by the fact that on February 18th, 2017 (just 3 days ago), a water main burst at the corner of Haverhill and Cazador - just feet from where the proposed development would begin (ATTACHMENT D).

The EIR needs to be revised to address the issue - and whether these additional 32 new homes will affect an already stressed, older, failing infrastructure system.

With all the hardscape of new homes, roads and retaining walls, this creates greater flooding problems, which is also not addressed. This increased hardscape will have direct impact on driving conditions onto and near Division Street, which is a major access road for residents of the neighboring communities of Mt. Washington, Glassell Park, Cypress Park, Highland Park and Eagle Rock.

ANALYSIS OF REAL ALTERNATIVES NEEDED

In spite of the request made by the those in the Glassell Park and Mt. Washington communities to look into alternatives (which is a CEQA requirement), the DEIR does not do this at all. The Mt. Washington Association asks that the feasibility of the following alternatives be addressed and considered in the EIR:

- next page -

1. The EIR should look into a **WALNUT CANYON PARK** alternative. This would be an analysis of the acquisition of the site for the creation of a park, which would eliminate or significantly lessen all or most of the adverse impacts of this development. This would reduce traffic, retain or improve upon the biology (habitat, protected species, walnut woodlands) already in existence; maintain or improve air quality; not stress the already inadequate, substandard roads; would not increase the already stressed infrastructure (water, sewer, utilities); retain or improve recreational opportunities for residents.
2. **A REDUCED DENSITY ALTERNATIVE**, which would be the construction of 16 vs 32 homes - all clustered together so that the walnut woodlands could be preserved as much as possible. This would lessen the significant impact of destroying a mature ecosystem; reduce grading; less hardscape; smaller impact on roads and infrastructure; better air quality, etc.
3. **A LOW DENSITY ALTERNATIVE**, which is more in line with the original RE-20 zoning for this property where you have 1-2 homes per acre (total of 4-8 homes) which preserves more open space; creates the least impact on density; preserves the established trail and most of the existing habitat.

The Mt. Washington Association asks that the EIR for Abode address all these issues through greater analysis which is currently lacking in the DEIR. The community asked for these issues to be addressed by Abode during the scoping process and it is incumbent that they be addressed in the EIR.

We ask that a thorough analysis be done on the least impactful alternatives suggested above, including the Walnut Canyon Park alternative, which (again) was never addressed in the scoping process.

Finally, we also ask that the destruction of Southern California Black Walnut trees by Abode be treated by The City of Los Angeles with the same severity and seriousness as was provided to the developer who violated the Protected Trees Ordinance in the wealthier community of Brentwood received. We request that a moratorium be placed on this project so developers know that justice is equal for all communities in the City of Los Angeles.

Sincerely,

Tony Scudellari
President, Mt. Washington Association

cc: Senator Kevin DeLeon / Assemblymember Jimmy Gomez / Supervisor Hilda Solis / Councilmember Gil Cedillo / Amanda Mejia, Northeast LA District Deputy for Mayor Eric Garcetti / Santa Monica Mountains Conservancy / The Federation of Hillside & Canyon Associations, Inc. / NELAGreenSpace / GPNC / GPIA / Amy Minter, Chatten Brown Carstens, LLC

ATTACHMENT A: OVERTURNED TRUCKS ON NARROW GLASSELL PARK STREETS





ATTACHMENT B – Wildlife Habitat in Walnut Canyon







ATTACHMENT C – DESTROYED SOUTHERN CALIFORNIA BLACK WALNUTS ON ABODE PROPERTY















ATTACHMENT D – FEB 18, 2017, WATER MAIN BREAK AT CAZADOR & HAVERHILL



