



**Shadow Hills Property Owners Association**

*Dedicated To Preserving Rural Community*

December 14, 2003

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

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 CITY OF LOS ANGELES  
 DEC 16 2003  
 ENVIRONMENTAL  
 UNIT

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

Ms. Zaitzevsky,

We feel that the grading program as proposed in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") is far too expansive, far too dangerous for long-term stability and far too incomplete in it's pre-grading testing program.

Cut slopes up to 100 ft. in height with gradients up to 1.5:1 are proposed. (DEIR Appendix D: Geotechnical Evaluation Pg 7). While technically not obligated to abide by the restrictions of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (heretofore to be referred to as the "Scenic Plan") as it has not yet been adopted as an Ordinance by the City of Los Angeles, the DEIR frequently claims to be in compliance with the standards of this Plan. This claim of the DEIR is false. I quote from the Scenic Plan Sec. 6A5: "In order to create slopes that reflect as closely as possible the surrounding natural hills, graded hillsides should have a variety of slope ratios, should not exceed a ratio of 2:1, and should transition to the natural slope in a manner that produces a natural appearance." Additionally, I quote from the Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Community Plan (heretofore to be referred to as the "Community Plan") Footnote #15: "Development located between the Sunland - Tujunga - Lake View Terrace - Shadow Hills - La Tuna Canyon Community Plan boundary line on the south, the DWP right-of-way on the northeast, and Sunland Boulevard on the northwest having a natural average grade of 2:1 or steeper shall be limited to Minimum Density." Whether "natural" or "man-made", these grades are not only unacceptable, but should most certainly limit development density to minimum density.

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Fill slopes up to heights of 200 feet are proposed (DEIR Appendix D: Geotechnical Evaluation Pg 7). Several retaining walls are proposed in both Development A and Development B to accommodate these design grades. While certainly necessary from a

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safety point-of-view, this is hardly in keeping with any effort to work with the natural terrain of the site or giving any consideration to the natural aesthetics of the site as frequently claimed by Canyon Hills.

33-2

Investigation of geotechnical issues on the Project Site were woefully inadequate. I quote from Section 4.0 of the DEIR Appendix D, Geotechnical Evaluation:

Based on the limited vehicular access, rugged terrain and anticipated shallow hard bedrock conditions, mechanical exploration techniques, including drilling and trenching with heavy equipment, would be extremely difficult to carry out on the project site. Among other things, extensive grading and alteration of the existing topography would be required to create the access roads and drill pads that would be necessary to undertake that type of subsurface exploration program.

~~Based on discussions with Building and Safety, the exploration program was developed in order to avoid impact to the project site. The program utilizes surface geologic mapping of numerous bedrock exposures throughout the project site augmented with (33) hand-dug test excavations within the proposed Development Areas. (2) Hollow-stem auger borings were excavated in the few areas that were accessible by vehicle to further verify subsurface conditions.~~

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In addition, there was a review of published regional geologic and geotechnical literature, maps and aerial photographs (DEIR Appendix D Geotechnical Evaluation Section 7.0).

The 33 hand-excavated test pits referred to above were located throughout the Development Areas (DEIR Appendix D - Geotechnical Report Section 6.0) at 1 foot to 7.5 feet in depth. The DEIR claimed that "the same geological data can be obtained from either a hand-dug test pit or a mechanically-excavated test pit." (DEIR Appendix D Section 6.0). 2 Hollow-stem auger borings were taken to depths of 35 feet and 41 feet respectively at which point they encountered refusal. In-situ representative earth material samples were retrieved at 5-ft. intervals, recorded, sealed and transported for laboratory analysis. One hollow-stem auger boring was located in Development Area A adjacent to the Verdugo Crestline Road and one in Development Area B adjacent to La Tuna Canyon Road. I must seriously question whether 2 hollow-stem borings, one on Development Area A (a 142 acre site), one on Development Area B (a 52 acre site) could possibly give a thorough overall accurate picture of the geological structure of the project site - all-the-more because they are taken from Development Area footprint borders, not central to the respective footprints. As for the statement that hand-dug test pits provide the same data as hollow-stem borings - am I really expected to believe that information gleaned from a 1 to 7 foot test pit could possibly equal that of a 35 to 41 foot boring?

33-4

The Project Site will one day be subject to the secondary ground-shaking of sympathetic faulting or fracturing or near-source ground movement as a result of a primary fault-line activity from one of the many known and classified-as-"active" fault zones within close proximity to the project site. The thrust or reverse Verdugo Fault 2 miles to the south, the thrust fault of the Sierra Madre fault zone 1.5 miles distant, the San Fernando fault zone

responsible for the 1971 Mw 6.6 earthquake located 2 miles distant, the San Gabriel fault zone 5 mi to the north, the Hollywood and Raymond Hill fault zone 8 mi distant, the blindthrust Northridge fault responsible for the 1994 Northridge Earthquake located 7 mi from the project site – all considered **active** by the California Geological Survey. (DEIR Appendix D – Geotechnical Evaluation Section 7.4.3) With such a surrounding landscape, so criss-crossed with fault zone systems and their potential for producing seismic events, can one reasonably accept the extensive cut-and-fill design proposed in the Canyon Hills DEIR? Slopes of 100 and even 200 ft in height? This extensive, tall, steep grading program can only be foreseen as a massive disaster in the making in the event of even just the sympathetic movements to primary shaking of a nearby fault zone.

33-4

Eight areas of potential seismic-induced rockfall have been identified within the project development areas. A number of landslides have been identified within the development areas leaving it subject to slope and/or foundation instability (DEIR Appendix D Section 7.4.5, 7.5 and 8.3.1).

I quote from Section 8.3.3 of the DEIR Appendix D – Geotechnical Evaluation: “The grading of south and northwest facing cut slopes for the proposed project may result in slope and/or foundation instability.” “The majority of the proposed cut slopes on the project site will expose highly weathered and/or highly jointed bedrock, which will be susceptible to possible surficial failure or deep-seated slope failures and will require stabilization measures.” Section 7.5.1 indicates that all five Sectors of the Development Areas are subject to potential slope instabilities that could lead to slope failures and subsequent hazard to property and risk of injury. Mitigation measures: most cut slopes will require replacement with stabilization fill or the construction of retaining walls. Being aware of the potential for slope instability as a result of these steep 1.5:1 cut slopes, why create such tall artificial instable slopes in the first place? Slopes that will become so subject to rockfall and landslide? Why not make a stronger effort to work with the natural terrain in the first place? Similarly, fill slopes will require marked mitigation to deal with slope instability. (DEIR Appendix D Section 8.3.5) Again, why create artificial 200 ft fill slopes often at a 2:1 slope that require such immense mitigation as use of geogrid or retaining walls, rather than design the development more around the natural terrain of the property.

33-5

A further point of contention for the community can be found in Section 8.3.4: “The majority of the cut pads proposed in the development plan are situated along ridgelines .....”. What happened to frequent claims of compliance to the Community Plan? Footnote 19 of the Community Plan states: “There shall be no grading of the principal (note: not just “prominent”) ridgelines within the Plan boundaries.”

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Shadow Hills Property Owners Association