



## Shadow Hills Property Owners Association

*Dedicated To Preserving Rural Community*

December 26, 2003

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

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

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**DEC 31 2003**

ENVIRONMENTAL  
UNIT

Ms. Zaitzevsky,

The equestrian community is voicing some concern over the potential need for blasting procedures during the grading process of the Canyon Hills Project as per the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") IV-A-32.

Horses are highly sensitive to sudden loud noises and even the most insignificant level of ground vibrations, therefore the developers should make every attempt to provide advance notification to the ENTIRE equestrian community at least 48 hours prior to the procedure. We understand that it would be totally unfeasible for Canyon Hills to make personal contact with each and every person potentially effected by these procedures, however we do recommend that they utilize contact with local community organizations through which information can be passed on to their members and to the community at large through their various E-mail trees and Web-sites. Information passes through the community quite thoroughly by this method so that person without computer access will certainly get the information by word-of-mouth. A number of organizations that would be helpful to contact would include the Sunland-Tujunga Neighborhood Council, the Foothill-Trails District Neighborhood Council, ETI-Corral 20, La Tuna Canyon's Homeowner's Association and Shadow Hills Property Owners Association. Such notification would provide warning to equestrians to avoid riding on days of anticipated blasting. A spooked horse could result in serious injury to himself and a thrown rider.

106-1

Following are responses to mitigation measures noted on pages IV-A-33 to IV-A-36 of the Geology and Soils section of the DEIR.

I quote from pg IV-A-33: "significant impacts to geology and soils would occur with implementation of the proposed project due to the potential for rock fall, landslides, and cut slopes." Mitigation measure A-1 states: "The project developer shall incorporate setback

106-2

zones from potential rock fall areas (as shown in Figure IV.A-1). In areas where proposed structures may encroach within the setback area, rock fall containment devices shall be incorporated into the design . Examples of such devices include debris fences or walls, rock bolting and netting, or rock fall containment basins.” First, **no** structure should be allowed to encroach in set-back zones of rock fall areas. With the possible exception of rock fall containment basins, all suggested containment devices are flawed in concept. Debris fences are unsightly. Debris walls may or may not be unsightly depending on their design, however in no way are they in keeping with any attempt to retain as much of the natural viewshed of the area as possible. Rock-bolting has been known to dislodge under stress bringing rock with it and netting will rust and break down overtime thus, in the long-term, leaving rock fall areas a danger to property and person.

106-2

Response to Mitigation A-3 (DEIR IV-A-33/34): All roadways and lots should avoid landslide areas. No amount of stabilization or shear-key construction can fully assure against slope instabilities and it’s subsequent potential for damage and injury.

106-3

Under the “Cumulative Impacts” section (DEIR IV-A-35): A reference was made to the 13 related projects that the DEIR took under consideration. It was here claimed to be referenced in “Figure II-1”. This statement is erroneous. Figure II-1 is a mapping of “Project Location and Regional Vicinity”. It is actually Table II-3 and Figure II-2 that provide the listing and mapping of the locations of related projects respectively.

106-4

Proceeding to the chapter on Air Quality (DEIR IV-B):

Firstly, it becomes difficult to follow the anticipated effects of the Canyon Hills Project as Table IV-B-1, a listing of Ambient Air Quality Standards, are in units of ppm and ug/mmm whereas Emissions Thresholds of Significance for the Project (DEIR Table IV-B-3) and Operational Emissions (Table IV-B-6) are in units of pounds/day. I am sure there is a conversion factor from one unit to the other, but why make it so difficult for the average community resident, who must reasonably understand these tabulated figures and their respective emission-load increase information as forecasted for the Canyon Hills Project, to follow these tabulated figures? Please tabulate these emission factors in the same units.

106-5

I also question why a monitoring station for CO concentrations at the intersection of Tujunga Canyon Blvd/Foothill Blvd (Table IV-B-7) would be expected to provide a fair evaluation of the forecasted impact of increased CO emissions as a result of the construction of the Canyon Hills Project. A more honest impact study should be performed at the I-210 Westbound ramps/La Tuna Canyon Rd/Development A Access intersection. This due not only to the anticipated notable increase in traffic volume at this location, but also due to the signalization system that this traffic will require which will lead to a marked concentrated emission rate especially at peak Am and PM hours as slow-moving vehicles from the 211 homes of Development A queue at this single ingress/egress point.

106-6

Elektra G.M. Kruger, President  
Shadow Hills Property Owners Association

