

each replacement tree must be at least a 15-gal specimen. However, one quickly loses faith in the "magnanimous generosity" of Canyon Hills when one realizes that rather than following the intent of the Oak Tree Ordinance, the much larger boxes are quite self-serving as development show-case specimens at development entry points and common areas. What has happened to any effort to replace larger trees where the remaining wildlife could once again use it – the detention basin, the fuel modification areas and most especially as an effort to restore the riparian habitat areas? Without the protection of a "nurse tree", acorns, seedlings, 1-gal specimens and even 5-gal specimens will never survive. Canyon Hills might just as well save their money on this portion of the mitigation program. Larger trees are much needed in the fuel modification areas and most certainly in areas of redeveloping riparian habitats where they can not only provide a food source, but also provide nesting opportunities. To place seedlings and acorns along equestrian trails is ludicrous. Unseen small trees will succumb to compacted soil and trampling. Larger trees would have some chance of survival as horse and rider will see them and avoid them.

I question the authenticity of information provided by the DEIR. According to the CD-rom Biology File under Summary section Native Trees, the largest replacement Oak to be placed at entry points is to be 72" box specimens. According to Table IV-D-16, the largest replacement Oak to be placed at entry points is to be 60" box specimens. Well? Which is it? If such data is found to be inconsistent within the DEIR, how much other data not showing any obvious inconsistencies is in error?

I quote the DEIR from the CD-rom Biology File under Summary Section "Significance after Mitigation": "With implementation of the mitigation measures described above, the proposed project would not have any significant impacts on biological resources with the exception of native trees." I beg to differ. Destruction of Riparian and Woodland habitat, however "temporary", most certainly will have a significant impact on faunal biological resources dependant on native vegetation for food and nesting opportunities.

Further, the DEIR states that 211 acres of the Canyon Hills ownership affected by grading will never be re-vegetated. (DEIR CD-rom Biology File under Summary section Project Impacts). This too will unquestionably have a significant impact on all biological resources.

I quote from the DEIR CD-rom Biology File's Draft Tree Inventory and Impact Analysis 7.6 Mitigation Plan: "All tree plantings would be subject to a 5-yr monitoring effort by an independent certified arborist. The monitoring effort would consider growth, health and condition of the subject trees in order to evaluate the projects success. This monitoring effort might result in recommendation of remedial actions should any of the tree plantings exhibit poor or declining health". This alone is too vague and requires greater detail eg what would constitute "remedial action" and a clearer definition of what state of growth, health and condition would trigger remedial action, not just "recommend" it.



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

December 7, 2003

Maya Zaitzevsky, Project Coordinator  
City of 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

Ms. Zaitzevsky,

We find many features of the biological resource impact analysis either woefully inadequate or highly questionable.

Initially, the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR"), implies that the "study area" includes the totality of the 887 acre Canyon Hills Project ownership as well as the adjacent Duke property yet, further down the same page, a statement is made that the focused surveys for special status species and vascular plants were generally limited to the proposed development areas and areas affected by the access road across the Duke Property. Survey's should have been conducted over the totality of the 887 acres ownership first because a development of this size will surely impact areas far beyond those of actual construction and secondly because one of the Alternatives – Alternative D – will indeed cover the entire ownership.

A glaring example of a highly questionable survey methodology would be that for the California Gnatcatcher. The preferred habitat for this bird is Coastal Sage Scrub (CSS) and Coastal Sage Scrub/Chaparral Ecotone. I refer to page 305-306 of the DEIR CD-Rom Biological File. By reconnaissance survey and examination of aerial photography of the Survey Area, site access and estimation of the extant of CSS and CSS/Chaparral Ecotone habitats which would serve as potentially suitable habitats by the coastal California Gnatcatcher were determined. This determined Survey Area was then broken down into four habitat survey polygons of less than 80 acres each. Protocol surveys were claimed to have been conducted according to the 1997 guidelines issued by the USFWS. Each single biologist surveyed one survey polygon per day. The presence or absence of the coastal California Gnatcatcher was determined by identifying each bird by sight and/or call using a combination of taped vocalizations and "pishing" sounds. Taped vocalizations were played

at intervals of approximately 200 feet for at least 10 -15 minutes. The use of taped vocalizations was utilized only when necessary to illicit a response from birds.

Now, I am not the greatest mathematician in the world, but:

$44,000 \text{ sq. ft.} / 1 \text{ acre} = X \text{ sq. ft.} / 80 \text{ acres}$      $X=3,520,000 \text{ sq. ft.}$  of terrain surveyed in one day by one biologist

$200 \text{ ft} \times 200 \text{ ft} = 40,000 \text{ sq. ft.}$  (the area covered per observation)

$3,520,000 \text{ sq. ft. (total terrain)} / 40,000 \text{ sq. ft. (per observation)} = 88 \text{ observation stops}$

$88 \text{ stops/day} \times 15 \text{ min./stop} \times 1 \text{ hr./60 min.} = 22 \text{ hrs./day}$  that our diligent biologist dedicated to this survey

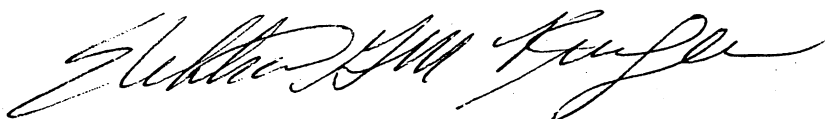
Sorry, but I find this hard to believe.

I quote from the DEIR CD-rom Biological File 2.2.12: "Surveys for special-status raptors were conducted in concert with the surveys for the California Gnatcatcher, Least Bell's Vireo and Rufous-crowned Sparrow. Now, if there were a team of at least two Biologists working together, they might be able to do justice to a survey for such a multitude of species – especially considering these birds are not extremely obvious – but for one Biologist to do an adequate survey for each of these at the same time is questionable, especially after about the 10<sup>th</sup> hour straight in the field.

I further quote from the DEIR CD-rom Biology File 4.3.2: "Coastal sage scrub vegetation is the preferred habitat for the federally listed threatened Coastal California Gnatcatcher; however, focused protocol surveys conducted within all areas of Coastal Sage Scrub within the proposed development area in 2002 did not detect any Coastal California Gnatcatchers in the Study Area. Many of the slopes that support Coastal Sage Scrub are very steep while Gnatcatchers generally prefer areas that exhibit more gentle topography. As such, the lack of detection of Gnatcatchers is in large measure due to unsuitable topography." This quote makes me highly suspicious that areas of Coastal Sage Scrub (CSS) habitat in steep slope area were never even surveyed just as areas of steep slopes and high concentration of poison oak nullified Oak Tree surveys in those areas. (DEIR CD-rom Biology File 2.2.13 -2) According to the current USFWS survey protocol (U.S. Fish and Wildlife Service. Coastal California Gnatcatcher. Presence/Absence Survey Guidelines. February 28, 1997.), 6-9 visits are required during a season in all appropriate habitat.

I note also that two gentlemen joined the tree survey team as well as the avifauna survey team – Mr. Rick Riefner and Mr. Jeff Ahrens. Not questioning their knowledge, in my ignorance, I ask if this is appropriate procedure for such a large and complex project.

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



December 9, 2003

Maya Zaitzevsky, Project Coordinator  
City of 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

Ms. Zaitzevsky,

It is our opinion that a great deal of the final determinations made in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the DEIR) have been made on little or, in some cases, even non-existent data.

I shall refer to the California Live Oak survey as an example. Tree health was rated on subjective observations based on such things as root anchorage, mechanical injury, symptoms of toxic gas and chemical exposure, presence of decay or cavities, etc. Presence of decay and heart rot were made merely on the assumption that it is a common occurrence in trees with cavities. I quote from the DEIR IV-D-87, "Heart rot is also believed to be present on many of the oaks as this defect is common to coast live oaks and the presence of cavities and calluses provide indirect evidence of it's presence." No coring or testing was done to check for the actual presence of decay or heart rot (DEIR IV-D-88). While discussion was provided on the relationship of a variety of "mechanical" appearances of a tree and their association to overall tree health, nothing was offered in the way of how toxic gas or chemical damage was evaluated or how the presence of heart rot and extent of decay was determined.

I now wish to address Canyon Hill's perception of the Oak Tree replacement standards. I quote from the DEIR Technical Appendices File G – Biology Draft Tree Inventory and Impact Analysis section 7.5 Determination of Minimum Replacement Standards: "The replacement standards provided in this Section (referring to the LAMC 46.02(c)1) suggest that they were not intended to address mitigation for larger properties with wildland oaks in natural settings. While the mitigation program described below satisfies this replacement standard, the simple straightforward replacement of a targeted tree by two or more 15 gallon or larger trees is generally best suited to scenarios where the impacted oaks are easily

viewable by or accessible to the public and aesthetic concerns are paramount.” I sorely beg to differ. The 2:1 replacement should be solely directed to replacement of trees to the remaining natural wildland where they may once again become a source of forage, nesting opportunities and cover for the remaining wildlife. Should the developer choose to improve the aesthetics of the development footprint with additional oak trees, that would certainly enhance the viewshed of the development to the general public.

I do most heartily agree with an additional quote taken from the DEIR section 7.5 described above: “The position of the oaks and sycamores in deep canyons and remote hillsides make them less of a community benefit and almost exclusively a wildlife resource. This wildlife resource cannot be replaced by the planting of container stock in a park or urban setting. Rather the replacement of the entire habitat must be undertaken by the restoration of the lost community, in this case of oak woodland, riparian forest and mixed chaparral plant communities.” I could not have described the heart and soul of the intent of “mitigation” any better myself.

I quote once again from section 7.5 as described above: “The goal of the mitigation program proposed herein is creation of a landscape that maximizes the compensation for lost habitat values while fully addressing the need to provide a community landscape that reflects the natural heritage of the Verdugo Mountains. This program would be superior to one that simply responded to arbitrary replacement ratios without concern for an overall landscape theme and wildlife habitat.” I must ask where the Canyon Hill’s Oak Replacement Program makes ANY effort to compensate for lost habitat or show any concern for lost habitat. According to the DEIR Table IV-D-16 and CD-rom Biology File under Summary section Native Trees, all tree replacements are scheduled to take place at development entry points, common areas, road right-of-ways, private lots, detention basins, slopes, etc. Not a single replacement tree has been scheduled for planting in ANY lost habitat area! And nearly 19% of the oaks now located on the project site will be impacted by the project as proposed in the DEIR. (DEIR Technical Appendices File G – Biology – Draft Tree Inventory and Impact Analysis section 6.3)

I quote once again from section 7.5 as described above: “Direct seeding of acorns is most appropriate in either non-irrigated or limited access sites where habitat enhancement is the key concern.” First, I see no entry in the oak tree replacement program as described in the DEIR that ANY acorns are scheduled to be seeded in any lost habitat area. Further, without the protection of a “nurse tree”, acorns have little chance of germinating and essentially no chance of surviving. The DEIR itself describes the Oak as a very slow-growing tree. The need for functional habitat replacement as soon as possible is paramount – an acorn just won’t do. Failure to replace lost habitat does NOT constitute mitigation! The closest that Canyon Hills comes to providing replaced oak trees that MIGHT be available to wildlife is in the detention basins, flood control areas and possibly the fuel modification areas. Yet it is these areas that receive the least consideration being replanted with a few 15-gal stock, but then 5-gal, 1-gal and seedling stock and acorns. This is unacceptable.

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



December 9, 2003

Maya Zaitzevsky, Project Coordinator  
City of 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

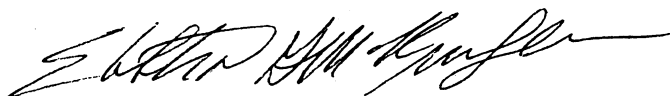
Ms. Zaitzevsky,

If approved as put forth in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR"), the Canyon Hills Project is most assuredly a catastrophe in the making. The Project is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a canyon prone to wind-driven wildfires such as those common to our episodes of Southern California's Santa Ana Winds. This so much the more hazardous as the Project would also be out of compliance with the City of Los Angeles' Fire Code, Los Angeles Municipal Code, Section 57.09.07 which specifies maximum response distances for residential land uses. The maximum response distance specified for an engine company is 1.5 miles. The maximum response distance for a Truck Company is 2.0 miles. A "Task Force Station" consists of a Truck Company, an Engine Company and at least 10 personnel. A Truck Company consists of 2 vehicles, one a truck with a 100 ft aerial ladder apparatus and one an engine which is a vehicle with a pump. An Engine Company has only one vehicle, an engine with a pump. The nearest station to the Project would be Station 74 on Foothill Blvd., a Task Force Station with a truck and engine company as well as a paramedic ambulance and Emergency Medical Treatment rescue ambulance, **2.8** miles away. The Station has 12 personnel. There are two other Stations that would serve the Project. First is Station 24 located 3.4 miles northwest of the Project on Wentworth St. in Sunland which consists of a single engine company and has a personnel count of 4. The third Station that would be available to the Project would be Station No. 77 located approximately 4.25 miles southwest of the Project on Glenoaks Blvd. in Sun Valley. This station has one engine company, a paramedic ambulance and a personnel count of 4. These distances are based on the route from the respective Stations to the intersection of La Tuna Canyon Road and the I-210, the proposed site of the **single** ingress/egress intended to serve the 211 homes of Development A and does not take into account the additional distance along the access road internal to the Project prior to encountering even the nearest home. In the event of a

wildfire, can you picture vehicles from 211 homes attempting to leave from the same single ingress/egress that emergency vehicles are attempting to use to enter? The secondary emergency access suggested by the DEIR (DEIR IV-J-7/8) along either Verdugo Crestline Drive or Inspiration way is ludicrous. I have recently driven these roads in my small half ton pick-up and found it terribly difficult to negotiate the narrow roads with their frequent hair-pin turns. There is no way that a fire truck with it's 100 ft ladder apparatus could circumvent these roads. Homes often border directly along the roadway, so I find it difficult to believe that these roads could be widened enough to meet Fire Code standards – and even if they could, the emergency vehicles still would never be able to negotiate those turns. To picture this secondary access to be used merely as an exit route for residents is no less ludicrous. In the panic of trying to leave a dangerous situation, traveling these narrow curving roads would be a slow process resulting in a queue of cars potentially caught in the line of fire within the canyon. Furthermore, to follow the route toward Foothill Blvd would be next to impossible for anyone not familiar with the path. Without going into the details, please trust me that one might very likely simply drive a circle right back into the canyon one is trying to exit.

The DEIR claims an expected 831 resident increase to the area, a number I find sorely understated. However, even at 831, the new resident population would greatly increase the potential for wildfire starts in the area and also the need for paramedic services – an area in excess of Code specified distances from the nearest Station – at a time when every second may be crucial.

I now quote from the DEIR IV-J-7: "Since the response distance between the Project Site and the primary response fire station is not within Fire Code specifications pertaining to engine and truck companies (1.5 miles and 2.0 miles, respectively, for residential development), impacts with respect to distance criteria are considered to be potentially significant. However, LAMC Section 57.09.07 provides that, where a response distance exceeds the maximum response distance set forth in the Fire Code, all project structures shall be constructed with automatic fire sprinkler systems in order to compensate for the additional response distance. That requirement has been included as Mitigation Measure J.1-7 below." Note: The DEIR states this Mitigation Measure number in error here – the referred-to Mitigation Measure is Mitigation Measure J.1-1. (DEIR IV-J-9). I further quote from the DEIR (DEIR IV-J-9): "With the implementation of Mitigation Measure J.1-1, the proposed project would not have a significant impact on fire protection services." This, too, is quite ludicrous. Fire sprinkler systems are intended to control fires starting internal to a structure. How is an automatic sprinkler system going to control a wildfire that burns down a structure leaving the automatic sprinkler system to stand naked. This hardly serves as a primary Mitigation Measure as implied by the DEIR. The majority of the remaining listed "Mitigation Measures" are already specifications of the Fire Code and should not be considered Mitigation Measures unique to the Canyon Hills Project.



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

December 10, 2003

Maya Zaitzevsky, Project Coordinator  
City of 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

Ms. Zaitzevsky,

The Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the DEIR) is highly incomplete in its evaluation of its potential cumulative impact relative to traffic, fire and police protection services and any number of additional significant public services. The DEIR lists in Table II-3 its version of significant cumulative projects which include such relatively **insignificant** items as a fast-food restaurant, auto-repair shop and single family residence. Such projects as the fast-food restaurant and auto-repair shop would be quite minimally significant to La Tuna Canyon as they are located on Foothill Blvd. No reference is made in this table or anywhere else in the DEIR to the 34-unit development now under construction in a more westerly portion of the Canyon itself and its potential cumulative effects on traffic, fire and police protection services, etc.

In regard to police services – the Project Site is located in Reporting District RD-1694 of the Foothill Station. Table IV-J-1 provides 2002 statistics for crime rates in RD-1694, however fails to compare this to population levels. One must search the appendices to find statistics prepared by the LAPD Community Relations Section Crime Prevention Unit which notes in its Table of 2001 statistics that there were 32 crimes per 1,000 population committed.

The LAPD preferred emergency call response time is 7.0 minutes. The DEIR provides statistics for response times for the entire Foothill division (DEIR IV-J-15/16) which is 11.4 minutes, but makes no reference to average emergency call response times for RD-1694, a statistic that would be far more significant to us. RD-1694's average emergency response time is 14.7 minutes.

Should the entire Canyon Hills Project be approved as set forth in the DEIR, each police officer will have to face a 93% increase in crime rate from this development alone.



$32 \text{ (crimes)/1,000 population} = X \text{ (crimes)/1,831 (pop. in 2001 + pop. of Canyon Hills)}$   
 $X = 58.6$

Increased # of crimes committed =  $58.6 - 32.0 = 26.6$

$26.6 \text{ (increased \# of crimes committed)/32 (\# crimes committed in 2001} = X\%/100\%$

$X = 93.1\%$

The Canyon Hills Project, as set forth in cumulative conjunction with other significant projects as referred to above, will noticeably further strain the already chronic shortage of the Police Department thereby increasing even further the emergency response time to a totally unacceptable level.

Fire protection services also will be facing a number of problems. For starters, the primary response Station for the Canyon Hills Development would be Station # 74 on Foothill Blvd, located at a distance of 2.8 miles, a distance out of compliance with the Fire Code which specifies the maximum response distance for a truck company to be 2.0 miles. The primary route that this Station would utilize to reach the Canyon Hills Project area would be via Tujunga Canyon Blvd, a one-lane road with no shoulder on which cars can pull over. A similar condition exists on Lowell Ave., a potential alternate route for Station 74. It is already difficult for Fire trucks to maneuver on these roads in emergency situations due to traffic, the notable increase in traffic levels on Tujunga Canyon Blvd. from the Canyon Hills Project alone would make it next to impossible.

All entries under the DEIR Fire Mitigation Measures (DEIR IV-J-9/10/11) are already existing specifications under Fire and Building Codes and, as such, hardly serve as mitigation measures. Their pat on the back with the following quote from the DEIR (DEIR IV-J-9): "With the implementation of Mitigation Measure J-1-1 (installation of automatic sprinkler systems), the proposed project would not have a significant impact on fire protection services." Aside from the fact that automatic sprinkler systems are already required in High Fire Zone Districts by Code, in the event of a wildfire what good would a sprinkler system, designed to squelch a fire internal to a structure, serve as the structure burns from external flames leaving the sprinkler system to defend a long gone building.

The suggested secondary access routes leading to Inspiration Way or Verdugo Crestline Drive are unimproved and sub-standard with roadways approaching these access roads ie Alene Dr. and Hillhaven Ave. being too narrow, too steep, and with their numerous hair-pin turns making them impossible to mitigate.

And what about all the traffic heading for La Tuna Canyon Road – the only real exit – in the event of a wildfire? Does anyone remember the southern California fires of October 2003? The bumper-to-bumper traffic, totally congested and moving at a snail's pace because all developments fed into one main road – just like La Tuna Canyon Road!

  
ELVIRA G.M. KRUGER

December 11, 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

Ms. Zaitzevsky,

In my opinion, the Canyon Hills Project as proposed in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") fails in it's obligation to meet the recreational needs of it's future residents.

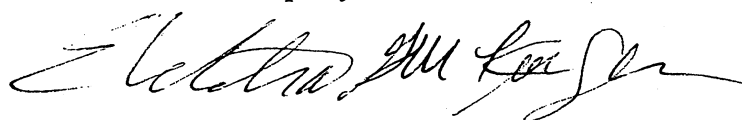
Currently, the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 population. However, this standard is not being met in the City of Los Angeles nor in the Project Site vicinity. Table IV-J-2 of the DEIR lists neighborhood and community parks within the vicinity of the Project and their distance from the Project area. I am familiar with the area and could, by no means, accept the mileage figures presented. As it turns out, a notation at the bottom of the page does indicate that the noted distances are linear. I am sorry, but no one flies from their residence to a park facility. The listed facilities are not readily accessible from the Project Site, most with major boulevard as well as true access distance issues. In addition to this, the listed parks have limited or no recreational opportunities such as baseball diamonds, soccer fields, basketball courts, etc. Facilities directed toward youth-oriented activities. Ideally, neighborhood parks are 5 to 10 acres in size having a service radius of approximately ½ mile and pedestrian accessible without having to cross a major arterial street, highway or freeway. Community parks are ideally 15 to 20 acres having a service radius of 2 miles and similarly are easily accessible to the area served. In subdivisions containing more than 50 dwelling units, develops may dedicate parkland in lieu of paying Quimby fees. It would be far more appropriate for Canyon Hills to dedicate a few acres for a high-density community park. According to the DEIR, the proposed project would increase the local residential population by approximately 831 persons, a figure I believe to be sorely understated. However, based on the preferred parkland per population ratio of 4 acres per 1,000 persons, the proposed project would require the use of 3.3 acres of new parkland. The added population associated

with the proposed project would most assuredly result in the need for new or expanded park facilities thereby notably impacting these recreational facilities according to Appendix G of the CEQA Guidelines. Without onsite **active** recreational facilities, there would be a local deficiency of active recreational opportunities for children and youth at the project site. The DEIR claims: "There are no available flat areas on the project site that would permit the development of a park with a wide range of active recreational facilities for children and youth." (DEIR IV-J-26). It is very difficult for me to believe that in the entirety of an 887 acre property, there is not a single 3.3 acre piece of near level land that could be molded into a community park. I strongly recommend that Canyon Hills confer with the Los Angeles Department of Recreation and Parks to survey the site for potential community park locations. The planned tot lots, passive open space and picnic areas do NOT offset the need for high-density active recreational facilities with baseball diamonds, soccer fields, basketball courts, etc. The Canyon Hills DEIR claims that the 1.7 acres of tot lots, picnic areas, bbq's, etc., plus the proposed 3 acre equestrian park should satisfy the requirements of the Quimby Act, however if not accepted, Canyon Hills will also pay Quimby fees. Although payment of Quimby fees legally serves as meeting a developer's responsibility in satisfying the need for up-graded recreational facilities, this is just a cop-out for a development the size of Canyon Hills. I beg you, we are far more in need of a new park than we are of fee payments, especially when taking into account the cumulative impact of the two residential-related projects of single-family homes acknowledged by Canyon Hills as well as the 34-unit development under construction in the canyon that is not acknowledged by Canyon Hills.

Currently, there is no proposed direct connection between Development A and Development B, so the equestrian trail system of the Verdugo's would be severely limited – especially considering that the Equestrian Park is to be on the south side of I-210 whereas the dedicated open space and the greater portion of the project site is on the north side of I-210. It would make far more sense to locate the Equestrian Park on or near Development A. Further, according to an NOP response letter submitted by a Mr. Matthew C. Thompson, the area of the Equestrian Park, as proposed in the DEIR, is highly subject to annual flooding and subsequent erosion. The proposed Equestrian Park is not located directly on La Tuna Canyon Road, but across a stream which would require the construction and maintenance of a bridge to access the facility. Mr. Thompson also states that the turn into and out-of the proposed Park is directly across from one of the most dangerous curves on La Tuna Canyon Road. Mr. Thompson also makes note of the fact that access to equestrian trails above the canyon initially traverses private land owned by a Mr. Cliff Beck. To date, Mr. Beck has permitted passage to the occasional equestrian, however he would be fully within his right to deny this access if equestrian traffic increases substantially.

Much further thought must be given to the recreational options provided by the Canyon Hills DEIR.

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



December 14, 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

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.

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

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.

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.

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?

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.

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.

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.”



Elektra Kruger, President  
Shadow Hills Property Owners Association