

If Verdugo Crestline Drive is paved for emergency fire access this would remove one existing barrier to development and provide a financial incentive for some of the current property owners to build additional housing.

The DEIR must examine how this project could induce the construction of additional housing at all the adjacent properties to Development Areas A and B. The omission of this analysis is a serious deficiency since growth-inducing impacts are a key element of adequate EIR review.

The project site is currently undeveloped open land. A community of 280 homes would be the largest residential development proposed for the area in decades. Most recent projects under construction or being proposed in the region are for between 10 to 60 houses. They also are located in existing residential neighborhoods or adjacent to prior subdivisions.

If approved, the size of this development will set a precedent for other projects of this scale. Other recent residential projects in the area did not impact several riparian areas, grade primary ridgelines, cut off important wildlife corridors, destroy so many mature oak trees or require the major changes in land-use designations and zoning that are being proposed for this project. The DEIR must address the Canyon Hills project's potential growth inducing impacts, which are significant and profound. The inadequacies in this section do not consider the consequences of suburban sprawl or help the decision-makers judge how this project conforms with the goals of the Sunland-Tujunga and Sun Valley-La Tuna Canyon Community Plans.

IV.I. TRANSPORTATION AND TRAFFIC

Project Impacts not adequately addressed in this section include the Emergency Access to Development Area A. The emergency access routes proposed are either Inspiration Way or Verdugo Crestline Drive which connect to Alene Drive and Hillhaven Avenue, ultimately connecting with Foothill Boulevard.

Inspiration Way and Verdugo Crestline Drive are substandard, unimproved dirt roads and not maintained by the City. Alene Drive and Hillhaven Avenue are currently too narrow to satisfy LAFD standards to accommodate emergency vehicles, as are Inspiration Way and Verdugo Crestline Drive.

This section states that Inspiration Way and Alene Avenue "can and would" be improved to comply with standards required by the LAFD. There is no explanation how this would be done or who would pay for these improvements. Inspiration Way can't be improved to provide a minimum 20-foot paved roadway without the city exercising eminent domain on currently developed residential properties. All of these properties adjoin the existing unimproved dirt road and some houses have no setback. The intersection of Inspiration Way and the site access can't be improved to provide the minimum 30-foot turning radius required by LAFD without condemning portions of current properties. Necessary improvements of both Inspiration Way and Hillhaven Avenue would also require relocating telephone and other utility poles.

Verdugo Crestline Drive would be improved where "As indicated on the project site plan, Verdugo Crestline Drive encroaches into the northerly portion of Development Area A."

It cannot be determined from the project site plan where this “encroachment” is located. (It also can not be determined from the project site plan where the northerly portion of Development Area A is located Verdugo Crestline Drive.) If this road is ultimately used for emergency access there is no commitment by the applicant that Verdugo Crestline Drive “can and would” be improved between Alene Drive and the northern part of Area A, an estimated distance of approximately ½ mile.

There is also no commitment that Hillhaven Avenue “can and would” be improved to LAFD standards.

An engineering study must be done to show whether these required road improvements can be actually be implemented. The City currently has a project to pave all existing dirt roads to comply with AQMD requirements. Both Inspiration Way and Verdugo Crestline Drive have repeatedly been evaluated by the City for street paving and determined to present serious “engineering issues”. The DEIR must analyze the impacts of improving these roads since this would require significant grading of hillsides and/or the filling of steep canyon slopes. The applicant must pay for all improvements of these roads, including the relocation of utility poles and reimbursement to land owners for loss of their property.

The intersection of Hillhaven Avenue and Foothill Boulevard is a stop sign, with no traffic signal. This intersection is inadequate to handle traffic during an emergency. During previous wildfires requiring evacuation of the residents in the existing community south of Hillhaven Avenue, traffic was diverted from Hillhaven at St. Estaban onto Commerce Avenue and the traffic signal at the intersection of Commerce and Foothill Boulevard.

As condition of the approval of Development Area A, if Inspiration Way or Verdugo Crestline Drive are used for emergency access, a traffic signal must be installed at the intersection of Hillhaven Avenue and Foothill Boulevard. The applicant must also pay for this improvement.

The secondary emergency access for Development Area “A” through Woodward Avenue needs a more complete environmental review. As it is possible that the proposed access via Verdugo Crestline Drive or Inspiration Way are unfeasible, Woodward may be the resulting access road. Since Woodward is currently unimproved and uninhabited it wouldn’t impact any existing houses or infrastructure. The rationale that it would be “much less expensive” not to consider Woodward Avenue is not sufficient to reject this alternative and the DEIR should include the environmental impact of building a road there.

The Safety Review section is incomplete regarding the accident frequency on La Tuna Canyon Road. While acknowledging that a portion of this street is subject to hydroplaning and that road improvements were made in 1997, this road still has drainage and hydroplaning problems. A complete disclosure of the accident history of this stretch of road since 1997 must be included, as it is the main access from both development areas. If 2,694 daily trips are estimated to result from the additional population, there will not be a “small increase in traffic on this portion of La Tuna Canyon Road relating to the proposed project” The DEIR must address the safety problems that still exist on this road and mitigate these.

IV.J. PUBLIC SERVICES

The Public Services section is especially inadequate in its analysis and conclusions. The proposed mitigation measures do not address the identified problems. Proper resolution of police and fire safety issues and impact on other public services will require much additional infrastructure. These improvements must be financed by the applicant and not be paid for at taxpayer's expense.

The Cumulative Impacts in these sections refer mainly to Related Project No. 9, which is never identified in Section II.C except to say it's single-family residences in La Crescenta. It is impossible to evaluate the impacts of a related project without knowing what and where it is. The constant references to this unidentified project is confusing and misleading. If it is regarding the Oakmont View V development, that project has been withdrawn in December 2002 and is now a public park (The Verdugo Hills Open Space Preserve). The repeated reliance on an unidentified project to dismiss cumulative impacts is a serious deficiency in the DEIR and must be corrected. There are several residential projects in Tujunga, Sunland and Shadow Hills that are more relevant to these cumulative impacts and should be included.

• IV.J.1 FIRE PROTECTION

The project site exceeds the Fire Code's maximum response distance of for an engine company and a truck company. LAFD has said that the service ratio and response times for this proposed development are inadequate and significant. The only proposed mitigation for this is to install interior sprinklers in the proposed dwellings (Measure J.1-1), which is already required by building codes. This is clearly inadequate and serious safety issues are not rectified.

- *Response Distance and Access:* There is no data presented on fire department response time to either Area "A" or "B", and no mention of Paramedic response. The last page of this section says "Mitigation measures are provided below to ensure that adequate response time and access to the project site are provided". No such measures follow and must be included. Data for response time must also be included.

- *Emergency Access/Evacuation:* The proposed emergency access for Area "A" from either Verdugo Crestline Drive or Inspiration Way connect to Alene Drive and Hillhaven Avenue to get to Foothill Blvd. Neither of these streets can be expanded to satisfy LAFD standards to accommodate emergency vehicles, and can't be widened due to existing homes on one side and a canyon on the other. Further comments on this are in the Transportation and Traffic response of this letter.

• IV.J.2 POLICE PROTECTION

LAPD has suggested that "the proposed project could have a significant environmental impact on police protection services in the Foothill Area...the LAPD's concern related to safety stems from the current understaffing of the LAPD." The only new police station is one under construction in Mission Hills, which wouldn't address the staffing shortage in Foothill Division or provide additional police protection in the Sunland/Tujunga/La Tuna Canyon area.

In the Environmental Setting "...the project site is within Reporting District (RD) 1964." Development Area "B" is south of Interstate 210 and in a different RD, no data about this provided. This information must be included.

LAPD's preferred response time is 7.0 minutes, the Foothill Division average was 11.4 minutes, but no data is provided for RD 1964. According to a representative of the Foothill Police Advisory Board the average response time is for RD 1964 is currently 14.7 minutes, which is more that double the preferred standard of LAPD.

The DEIR concludes that "police units are most often in a mobile state; hence, actual distance between a headquarters facility and the project site is of little relevance." No data is provided on the distance from RD 1964 and Foothill Division Station, where patrol units have to file their police reports. The conclusion that the distance to the Foothill Station is irrelevant is incorrect. Patrol units that are filing their reports are not available to respond to emergency situations.

The DEIR looks mainly at the Foothill Division & LAPD in general, but the only specific data for RD 1964 are Crime Statistics. There is also no information on how many police units are regularly assigned to RD 1964. Mitigation Measure J.2-4 doesn't guarantee that mobile units will have access codes and/or keys to gated portion of project site.

This project will increase demand for police services, result in a reduction in services, lengthening of response times and strain already inadequate facilities. The DEIR must provide complete information about the police resources available for the proposed development including: how many units are currently assigned to patrol the area, the current and projected response times for patrol units, and all available LAPD data for the Sunland, Tujunga and La Tuna Canyon reporting districts. These facts are necessary for an adequate review of the police safety issues relating to the added population that will result from this project.

- **IV.J.4. LIBRARIES**

The proposed project would increase demand for service at Sunland-Tujunga Branch Library. LAPL has stated the additional residents from this development would adversely affect Sunland-Tujunga Branch Library. The DEIR identifies that 745.5 square feet of additional library space would be needed, but does not demonstrate how this will be accomplished. The Sunland-Tujunga Branch Library was re-built in 1995 with bond funds. Expansion of this facility is not feasible given the current footprint of the library and available funding.

The conclusion that proposed project wouldn't require physically altering existing library contradicts the previously identified adverse impact to Sunland-Tujunga Branch Library. Again, improvements to the local public library system must be financed by the applicant and not come from taxpayer dollars.

IV.L. UTILITIES & SERVICE SYSTEMS: WATER

This section states that “the proposed project would be required to provide two 1.5 million gallon tanks” however the location of these tanks are not given. Since these water tanks are generally described by elevation and approximate situation it can be inferred that the position of these units have already been determined and must be revealed. This section further notes that a new water main will be built along Inspiration Way. The construction of two 1.5 million gallon water tanks and new water mains through an existing community constitutes a major building project that is not analyzed in this document. The full environmental impacts of these improvements must be studied and disclosed.

III. General Deficiencies in the Draft EIR

Throughout this DEIR there appears to be a deliberate attempt to obfuscate basic facts, obscure the impacts of this proposed project and make it as difficult as possible for the decision-makers to determine the cumulative environmental effects of this project.

Several significant adverse environmental impacts that cannot be mitigated have been identified in this DEIR. According to CEQA Guidelines the DEIR must describe why this project is being proposed, in spite of these unavoidable significant environmental impacts. There is no such section in this DEIR.

There are many elements of this project that are not fully described and will be prepared at a later date. This circumvents the Environmental Review Process and is a serious deficiency in the DEIR. Additionally, “Lead and responsible agencies should not be allowed to rely on mitigation measures that will be formulated after project approval”. [*Kings County Farm Bureau v. City of Handford*, (1990) 221 Cal.App.3D at 728; *Sundstom v. County of Mendicino* (1988) 202 Cal.App.3d, at 306-308]

Some of these elements include:

Storm Water Runoff: “The proposed project will be required to submit site drainage plans to the City Engineer and other responsible agencies for review and approval prior to development of any drainage improvements...with the implementation of the approved drainage plans, no significant long-term operational impact from storm water runoff would be expected” This is inadequate and the conclusion that no mitigation is required is impossible to determine without prior review of the site drainage plans by the responsible agency. “Permanent drainage and debris control facilities shall be constructed to the satisfaction of the City Engineer.” This will be formulated after the project approval and again is inadequate.

Traffic (Emergency Access): “The emergency vehicle access plan, including the related onsite and offsite roadway improvements, is submitted for review and approval by the LAFD and the Bureau of Engineering prior to recording of the tract map.” If the emergency access plan is not approved by these agencies, alternative plans would require additional environmental review.

Fire Protection: Mitigation J.1-21 “Definitive plans and specifications shall be submitted to the LAFD and requirements for necessary permits satisfied prior to commencement of construction.” Why are these plans and specifications not disclosed in the DEIR?

Police Protection: Mitigation J.2-2 “The project developer shall submit a plot plan for the proposed development to the LAPD’s Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.”

IV. Conclusion

The cumulative deficiencies in the Canyon Hills Draft Environmental Impact Report require significant revisions to this document. To correct these inadequacies a new EIR must be prepared that fully analyzes the environmental impacts of this proposed project, includes suitable mitigation measures and proposes meaningful alternatives.

Respectfully,

A handwritten signature in cursive script that reads "Michèle Stone". The signature is written in black ink and is positioned below the word "Respectfully,".

Michèle Stone

December 10 ,2003

Los Angeles City Planning Dept.
Maya E. Zaitzevsky
200 North Spring Street
Los Angeles ,CA 90012.

**RE; ENV. 2002-2481-EIR; SCH# 2002091018
Canyon Hills project-DEIR Comments.**

Dear Ms. Zaitzevsky,

As a Tujunga resident since 1987 living in the neighborhood adjacent to the proposed development, I feel compelled to write after having studied the Canyon DEIR. While there appear to be many topics which raise question marks, I'd like to focus on an item which is of primary concern to me:

IV-I Transportation / Traffic [234 k]

After having read the above section, I began to wonder if the expert involved has ever hit Foothill Blvd. on any workday at 0700 or at any other time or day of the week. At this time of the morning there is already a high volume of traffic, **which increases by the minute**, and is backed up as soon as there is a slowing down due to a truck attempting to make a turn, racing fire engines, or lane closures because of roadworks. When an accident occurs, **and there are many**, it is virtually impossible to reach the 210 freeway from either direction on Foothill Blvd. The 210 freeway itself, plus the connecting freeways, such as the 2 and the 118 already have far more cars and trucks than they can handle, and more often than not I find myself on a parking lot.

If the developer gets the green light to build 280 homes instead of the 87 that he has permission for [which I don' object to] it does not take a genius to work out how many more cars are going to hit the road.: Apart from the 3 to 4 cars belonging to each household, there will be family and friends visiting, delivery trucks, painters, plumbers, you name it. The bottom line is:
I might not even be able to come near the 210 onramp anymore !!

Based on my observations and theory, I sincerely hope that the City will not allow the developer to exceed the number of homes that they have been granted permission for, but take into

consideration my concerns and that of all other
residents who may express different sentiments.

Thank you for your time,

Sincerely,

Lien Stoorvogel-Seesee
9515 Revere Rd.
Tujunga, CA 91042
U.S.A.

December 28, 2003

Daniel and Nancy Sweeney
9517 Cordero Avenue
Tujunga, CA 91042
(818) 841-9300

Los Angeles City Planning Dept
Maya E. Zaitzevsky
200 N. Spring St., Room 763
Los Angeles, CA 90012

Re: Canyon Hills, Tujunga, CA proposed development
Draft Environmental Impact Report # 2002-2481-EIR
SCH # 2002091018
Date of Report: October 2003

Dear Ms. Zaitzevsky

It has recently come to our attention that the development of 280 homes is being proposed next to our neighborhood. Of course we were very unhappy to hear about this because we enjoy the rural nature of the area. There are still no curbs along most of Tujunga Canyon Blvd and none at all along La Tuna Cyn and we like it that way. The woodlands and wildlife throughout Tujunga were some of the chief reasons we moved here 25 years ago. Now it seems a lot of changes are going to take place and not all of them good.

Of course a property owner should have the right to build on his land - even an out of state corporation whose only interest is speculation. However, I find it disturbing that developer Whitebird is expecting a number of zoning variances and additional exemptions to be made to increase their profitability while leaving our community with a greater number of homes in the development than present ordinances allow. We ask you to please deny Whitebird these numerous variances.

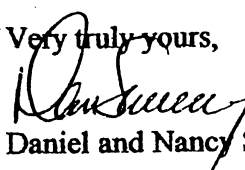
I realize that 280 homes will increase the tax base for the city but at what price? One specific variance the developer has requested concerns the removal of over 400 live oak trees. If our state found it imperative enough to introduce a law to protect live oak trees, why is it acceptable for Whitebird to remove any of them? An ordinary citizen has to obtain a permit to remove a dead live oak tree from his property. So our feeling is this: Whitebird, which is an out of state corporation must also follow the zoning laws as any ordinary citizen living in this city would have to or what is the point of ordinances? Surely, Whitebird was aware of the restrictions it would face well before the purchase of this site.

If granted these variances and exemptions, Whitebird's development will certainly change the entire nature of the area and might open the door for future requests by future La Tuna Canyon developers. It just takes one foot in the door. Furthermore, the developer's desire for a larger profit should not be a reason to grant the extensive variances requested.

Another worry is the project's location in a "Very High Fire Hazard Zone" which is prone to wind driven fires. The new resident population will increase the potential for wildlife fires starting in the area. No matter what fire requirements are met by Whitebird, we are now dealing with the human factor and fires are inevitable. What a shame it would be to increase the probably of fires which are already prevalent up here. Are we going to destroy the remaining woodlands that will exist along La Tuna Canyon? Haven't we learned our lesson from the most recent fires Los Angeles, Orange, and San Bernardino counties experienced?

Please deny Whitebird's request for it's numerous variances and exemptions and thank you for your attention to our concerns.

Very truly yours,


Daniel and Nancy Sweeney

Cc: Mayor James K. Hahn
Los Angeles City Councilwoman Wendy Gruel
City Planner Dale Thrush

December 15, 2003

Barbara E. Trees
6903 Beckett St.
Tujunga CA 91042

Los Angeles City Planning Department
Maya E. Zaitzevsky
200 No. Spring St., Room 763
Los Angeles, CA 90012

RE: CANYON HILLS PROJECT, EIR Case No. ENV-2002-2481-EIR
Reference Nos: SCH # 2002091018

Dear Planning Department:

As a resident of Tujunga, I have several serious concerns about the accuracy of the above captioned EIR, as follow.

1. California Live Oaks to be removed.

Biological Resources - Native Trees (p.IV.D-122) states that a 234.32 acre area will be graded or significantly disturbed. In this same section, experts determined that there are 3.75 Live Oaks per acre. This would cause the removal of 879 protected California Live Oaks. However, two pages later (p.IV.D-123) the EIR reduces the removal to the "area of occupation" which is 69 acres, and states that 259 trees will be removed.

Concern: How many trees will actually be removed? If 234 acres will be graded or significantly disturbed, the removal will extend far beyond the "area of occupation." The EIR significantly understates by over 70% the number of trees that will be removed.

2. Sunland-Tujunga Community Plan

The Community Plan was in place when the developer purchased the property. The Plan is designed to protect the rural character of the area. La Tuna Canyon is one of the six remaining areas identified as a "Designated Scenic Highway and Scenic Highway Corridor." The Community Plan (1-3.3) requires preservation of existing views of hillside and mountainous areas and (5-1.5) Protect Scenic Corridors by establishing development controls in harmony with each corridor's individual scenic character. (Table IV.G-4, Land Use, p.IVG.20)

Concern: The "cut and fill" process (Project Description, p. 111-6) involves removing the tops of natural peaks to fill natural hillside depressions, thereby removing the existing hillside views in direct violation of Community Plan (1-3.3). The "cut and fill" process will also be applied to the area south of Interstate 210, which is La Tuna Canyon, a Protected Scenic Corridor. (5-1.5) Portions of La Tuna Canyon are protected areas because of the natural beauty of the Canyon, which would be adversely affected by the proposed development.

3. Public Safety and Security

The Foothill area is served by Fire Department #74, located 2.8 miles from the proposed development.

Concern: In a serious omission, the EIR does not address paramedic response time nor does it deal with the fact that the proposed development is a gated community, creating barriers for paramedic services.

I also found serious problems with the Biology and Wild Life portions of the EIR, in which animals common to La Tuna Canyon simply were not found. They found only five coyotes, **no deer, no bobcats, no Peregrin Falcon**. Other problems such as loss of stream canyons and habitat were not addressed.

I think that the EIR is seriously flawed. I request that another EIR be required to insure a fair and realistic appraisal of the effects of the proposed development.

Thank you for addressing my concerns.

Yours truly,

Barbara E. Trees

December 19, 2003

Maya Zaitzevsky, Project Coordinator
LA City Planning Dept.
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Re. Canyon Hills Draft EIR

Dear Ms. Zaitzevsky,

We want to begin by stating that we believe a property owner has the right to build on their property-- however, that right assumes that any building would be accomplished in accordance with existing guidelines. **Our concerns over the proposed Canyon Hills Development is that the existing guidelines (Community Plan) are clearly not being adhered to and the proposed development project is well beyond the scale that would be in accordance with the best interests of the neighboring community.**

We believe the draft Environmental Impact Report (EIR) for Canyon Hills Project grossly underestimates the impact that a development of this nature will have on the neighboring communities and our chosen semi-rural lifestyle.

There are several key impacts from the proposed Canyon Hills project which have been understated in the DEIR including:

- **Traffic and Overcrowding**
- **Visual Impacts**
- **Rural Quality of Life and Equestrian Issues**
- **Public Safety & Services**
- **Noise**

As a citizen expert, resident, and user of the area to be impacted, I believe I am qualified to address these issues.

Traffic and Overcrowding

Traffic: We have lived in Tujunga, for 11 years and have been visiting friends and relatives in the immediate area since 1968. The changes that have occurred in the area over that period have been dramatic, yielding increased population, increased crowding and traffic, and overall, reducing the quality of life that our foothills area once enjoyed. The proposed Canyon Hills project would only contribute further to that decline.

For several of those years I traveled up and down La Tuna Cyn Rd. twice daily in my drive to and from work. **The traffic increased noticeably, over that period, on the stretch of road that will be directly impacted by the Canyon Hills project: La Tuna Cyn Rd. from Sunland Blvd., and specifically at the point where the La Tuna Cyn off-ramp of the 210 Fwy meets La Tuna Cyn Blvd.** Now, I travel daily on Lowell and the stretch of Tujunga Cyn. Blvd. from the Verdugo Hills Golf up to Foothill Blvd. **Traffic is congested morning and evening, regardless of the time I depart and return. The widening of sections has really not impacted the traffic load, which is already significant;** I cannot believe that the potential added traffic derived from the proposed 280+ homes (stated as approximate-- which really translates that there may be more than that number) will not have further significant impact on an already crowded

Canyon Hills DEIR

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traffic situation. I believe **this fact is either clearly and deliberately understated in the DEIR or has been vastly under-estimated out of failure to significantly observe traffic patterns in the impacted areas. Either way, it bears reevaluation and is grounds for redoing the DEIR.**

My husband currently chooses to utilize the Sunland Blvd. on and off-ramps of the 210 Fwy, driving up congested Foothill Blvd. on his daily route to and from work in the Valley. **Despite the pleasure he derives from viewing the panorama of open hillsides and the sense of being in the country, on the stretch of 210 Fwy between the Sunland Blvd. off-ramp and the Lowell off-ramp, he chooses to drive busy Foothill Blvd. to avoid the delay and danger associated with the La Tuna Cyn. off-ramp** --which is already dangerous due to the speeds and volume of traffic flowing on La Tuna Cyn Rd, and the excessive waits to make the needed left turn to proceed East on La Tuna Cyn Blvd., and then the 2-lane stretch of Tujunga Cyn. Blvd. that must be traveled to get back up to Foothill Blvd.

People living near the Convalescent Center and the golf course cannot now easily get out of their driveways. One cannot imagine how they will ever ingress/egress once the additional projected traffic from Canyon Hills materializes. And of course **the DEIR has minimized the traffic congestion and delays on major thoroughfares that will be the result of construction traffic (heavy equipment, dump trucks, etc.) on the proposed project-- over the course of the several years that this development will take to be built!**

We cannot even imagine **the nightmare the traffic situation would become on La Tuna Cyn. Rd. with the addition of the Canyon Hills project and the projected number of people who will inhabit those homes on both sides of the freeway!** And the number of additional ingress and egress trips generated by outside service providers who will be needed for maintaining those homes-- the maids, gardeners, pool cleaning services, trash collectors, etc. that accompany the maintenance of residences of the significant proportions proposed.

Even installing a traffic signal at the La Tuna Cyn Rd. off-ramp location would be ineffective as the rest of **La Tuna Cyn Blvd. is sorely inadequate to handle the additional traffic that would be generated by the project.** In some places the road is already dangerous due to the nature of the curves, and the additional volume of traffic generated by the proposed project would certainly result in overcrowding at best, and potentially, could turn La Tuna Cyn. Rd. into a parking lot at peak traffic times.

And of course the increased traffic would have a significant impact on the homes in that community, due to the noise and pollution created by such volume. **Homeowners on La Tuna Cyn. will effectively be living on a major highway--with 4 lanes of bumper to bumper traffic, noise, and pollution, from pre-dawn till after dusk!** And I'm not even addressing the details of deterioration of quality of life for the horse owners and their animals who currently populate the La Tuna Cyn and Shadow Hills areas. But it's certain that the equestrians and horses who currently utilize the trails at the western end of La Tuna Cyn. Rd. (who we enjoy watching) will be kept from doing so by the traffic volume and noise levels. It would be suicide to try to ride your horse under those conditions!