

A-14 *"Other active faults in the area include the Sierra Madre fault 1.5 miles to the E-NE and the San Fernando fault 2.0 miles to the NW."*

Although the Sierra Madre fault has been quiet recently, the western extension of it, the San Fernando fault, was responsible for the Sylmar earthquake in 1971. Many houses under construction in the foothills of Sylmar at that time were sheared off their foundations and collapsed in upon themselves like houses of cards. Ground motions 0.8+ g were measured at Pacima dam during that quake.

A-19 *"Approximately 50% of the natural slopes are in the earthquake induced landslide hazard zone"*

Will the residents of this development really feel comfortable in these houses? This area seems to be one that cries to be left alone.[my opinion]

They speak of 11 landslides in the general area with 7 existing on the development project land. These range in size up to 370' wide, 150' high and 20' deep. To remove these will take a lot of earth movement, dust and noise in these quiet mountains.

A-21 through 24

*"Slope stability is a function of joint set orientation."*

Joints are cracks which extend through solid rock and, due to the tectonic forces which create them, tend to have a common orientation or direction.

According to the EIR, all 5 sectors of the development exhibit unstable joint sets in a southerly direction. Sector II also has unstable joint sets in the westerly and northwesterly directions and a southeasterly set is evident in Sectors IV and V. A short drive down La Tuna Canyon provides ample evidence of the failure of these joint sets in the region.

*"Fall slopes have a 1.5 safety factor during an earthquake."*

Again, I refer back to page A-19 and my question regarding the comfort the residents will feel if their children are in the area during an earthquake.

A-25 *"On site bedrock is highly weathered and fractured. A seismic refraction profile indicated a low velocity indicative of low physical strength [fractures and jointing] in the bedrock."*

Although the EIR indicates that this is good because it will make excavation on the site easier, and will preclude the need for blasting, it also points to the weakness of the underlying rock foundation throughout the entire project area.

A-26 *"Ground water- not a problem. The ground water table is 18-60 feet below the project land surface."*

Although liquefaction and water induced soil creep are not a problem in the area due to the alluvial nature of any sediments [coarse sands and gravels] and the excellent surface and ground water drainage, there are frequent temporary springs and seeps which can persist for 2-6 weeks after moderate rains. Again, due to the shattered nature of the bedrock and the extensive joint system, water is quickly absorbed in these cracks and eventually appears in unpredictable places at lower elevations. This can lead to softening of fill dirt and soil collapse. In some cases it can induce seepage under the concrete pads of buildings and the establishment of persistent mold infestations.

### CONCLUSIONS

The Environmental Impact Report [EIR] does not adequately address the seismic vulnerability of the proposed Canyon Hills development project.

The extremely shattered nature of the rock and the close set joint patterns have led to chronic problems of landslides, rockfalls and massive failures of rock faces, as evident in road cuts along La Tuna Canyon Road, the principal local road in the area.

The proximity of three [3] active faults within 2 miles of the project, and the fractured nature of the bedrock, invites a potential disaster if any of these faults experience a magnitude 6.5 or higher earthquake, as occurred in 1971 on the San Fernando fault.

Los Angeles City Planning Dept.  
Maya Zaitzevsky  
200 North Spring St. Room 763  
Los Angeles, Ca. 90012

Re: CANYON HILLS PROJECT – DEIR Comments  
ENV – 2002 – 2481- EIR; SCH #2002091018

Dear Ms. Zaitzevsky

This letter is a prefix to my comment so that I (also speaking for my wife, Marva) can explain my perception that the “PROJECT” as proposed by Whitebird will unacceptably exacerbate the risk of great losses in the event of a Santa Ana wind driven brush fire.

We have reached our seventies with some difficulty and lived at our present address on the very edge of Tujunga with nothing but brush and tree covered Verdugo Hills, LaTuna Canyon and the 210 Freeway between us and Burbank for 46 years. We have observed first hand at least four major brush fires; some destroying structures. I witnessed two that started from contacting power lines.

Previous fire storms, including last October’s multiple conflagrations, show that even the best equipped, trained and motivated single fire crew (as is Engine Company # 74) can not stop one of these fires – and what we have in Sunland-Tujunga is just one single fire crew.

Fire Station #74 was installed on Foothill Blvd. In the early 1950’s. Since then hundreds of homes have been built in Tujunga, mostly into the hills and often closely clustered.

As you are aware, the ‘PROJECT’ is to be located in a “Very High Fire Hazard Severity Zone.” Instead of just repeating that compliance will be in accordance with existing fire codes and regulations, in light of the October disasters and various politicians calling for a review of the way we develop these VHFHS Zones, why does the LAFD not come out positively against any variances to the existing General Plan for the site and the City’s slope density ordinance? In other words, why wouldn’t the Fire Dept. insist that only Alternative D is acceptable.

In fact, my own personal experience with LAFD is that they are unwilling to enforce compliance with the LAFD’s 100 foot brush clearance and 200 foot fuel modification from structure regulations when they affect adjacent undeveloped property. If the “PROJECT” were allowed to proceed, there would initially be hundreds of undeveloped adjacent properties and many even when the ‘PROJECT’ is completed (est. 10 to 15 yrs.) I have been trying to get the city to enforce those rules on the hillside (that I do not own) next to my home since the regulations were first issued. Perhaps the greatest concern is that with only a few initial responding units the well spaced homes in the older sections, such as Estepa Drive and Tranquil Drive and Place, will be ignored in favor of the new closely grouped, larger and more expensive homes in the “PROJECT”. There is

precedent for this fear. Some years ago the Glendale and LAFD did just that with the arson started fire adjacent to the 2 freeway. Houses were lost near the area of origin while the fire engines scooted eastward. There was much negative press on this for a time, and some similar rising out of the 2003 fires. Further substantiating this concern is the brush and forest fire chapter in the FIRE PROTECTION HANDBOOK. (My copy of this authoritative text is the fourteenth edition.) It states in section 5 of chapter 12 under fire control operations "Frequently, when insufficient forces are available at the early stages of a fire, the decision must be made to abandon certain areas in order to prepare a more efficient stand further back." Why allow a variance that will make this more likely to happen.

The developers state in several places that "homeowner's associations "will take care of this and that including some brush maintenance. Again, personal experience ( with my son's property) indicates there is no certainty and little recourse in this.

My education and profession was in aircraft engineering, which has nothing to do with brush fires. I will remark though, that one of my specialties was aircraft fire protection and I was responsible for fire protection and extinguishment for the Lockheed L1011 TriStar passenger aircraft, among other things

Thank you for considering my specific comments to the DEIR which follow.

Sincerely yours,



William C. Grove &  
Marva M. Grove  
7162 Estepa Drive  
Tujunga, Ca. 91042

**DEIR COMMENTS from: WILLIAM C. & MARVA M. GROVE**

**RE Canyon Hills Project – DEIR Comments  
ENV-2002-2481-EIR; SCH#2002091018**

The following Comments address the fire protection implications of the DEIR, particularly section IV.J.1, Fire Protection, under IV Environmental Impact Analysis, J Public Services

As residents of this VHFHSZ for 46 years and being exposed to brush-not on our property- on two sides, we have observed some local brush fires and followed others on the TV and newsprint with great interest. Therefore, relying on that experience we offer the following comments on the DEIR pertaining to fire protection.

#### **IV.G LAND USE DESIGNATION**

- A. The section on Land Use Designation states in part – “In addition, the Chief Engineer of the Fire Department is required to report that adequate fire Protection exists or is in the process of being provided. (see Section IV.J.1)”

One nearby fire station might be adequate for one house fire with fireproof roof and inside sprinklers. Two or three might be adequate to protect a few houses with required brush and tree clearance in a light wind. October’s fires and previous Verdugo Hills brush fires have shown that dozens of fire engines protecting hundreds of houses in a fire storm are inadequate. Since such fire storms occur with some frequency and some times at night with strong winds and no air cover, the Chief Engineer of the Fire Dept. can not and should not report that “adequate fire protection exists or is being provided.” After the October conflagrations, various people have called for review of the way we develop the hills. The EIR should be shelved (except possibly for Alternative D) until such reviews take place.

#### **IV.J FIRE STATIONS**

The DEIR does not tell us how many more homes in Sunland-Tujunga VHFHSZ have been built since Fire Station #74 was installed on Foothill Blvd. in the early 1950’s. Fifty years and no additional S-T fire stations – but a lot more houses - argue against further zone changes. The other two stations mentioned in the DEIR and any others are, of course, even more remote.

#### **IV.J FIRE HAZARDS**

The Los Angeles Fire Department Brush Clearance program is mentioned in footnote 10 on page IV-J-4, but not explained. The requirements in the program are specific regarding 10 feet, 100 feet and 200 feet clearance and fuel modification zones, but they State “you are only required to clear only on your own property.” From the map each lot

will be adjacent, at least on one side, to undeveloped land. On Estepa Drive, at least, we have found the LAFD can not be relied upon to force clearance on the absentee owner, therefore the hazard may be greater than perceived depending on each lot's configuration. This would be especially true before all the lots are developed. See also comment to recommended Mitigation Measure J-1-18.

#### **IV.J ENVIRONMENTAL IMPACTS**

##### **A. Short – Term Construction Impacts**

Construction activities often start brush fires and In a VHFHSZ on a dry, Santa Ana wind day, the local LAFD is not equipped and prepared to deal with such fires three to five miles from the fire station. Therefore there should be no construction activity on such days.

#### **IV.J LONG TERM OPERATIONAL IMPACTS**

The DEIR indicates two water tanks will be installed. The DEIR locates one 1.5 million gallon tank adjacent to the existing one on Estepa Drive (my street) but gives no Impact Information on Estepa Drive. More water is good. The impact details should be listed specifically, since this is outside the "Project".

What is it's effect on adjacent property? Will Estepa Drive be open during construction? Will Estepa Drive, which is in poor condition, support the heavy equipment traffic? Will water flow be interrupted to Estepa residents? Does the Project own this site or access? How will residents be protected from water tank rupture? Will higher street berms affect Access to driveways?

The other 1.5 million gallon tank is to be located in the northern portion of the development at 1900 feet. This means it may be atop one of the protected ridges. The location and visual impacts should be addressed.

Page IV.L.3 of the DEIR states water from the "new" Estepa Drive tank "would be delivered to Development A via a new water main constructed within the Inspiration Way public right-of-way" and "to supply the two new water tanks the existing 16-inch water main located within the LaTuna Canyon Road would be extended approximately 5,000 feet to the impact site." It is confusing which way water is flowing to the project. If they are getting water from LaTuna Canyon, why from Estepa Drive via Inspiration Way? A revised DEIR is needed to better explain water flows and head for comment. The impacts on Inspiration Way residents and services need to be presented in a revised DEIR for comment.

#### **IV.J LONG TERM OPERATIONAL IMPACTS RESPONSE DISTANCE AND ACCESS**

The DEIR states that Station # 74 is 2.8 miles from the intersection of the 210 freeway and LaTuna Canyon Road. What it does not say is that the distance from Station # 74 to

the farthest house is 4.7 miles and about 4.0 miles to more than half of the home sites. (by scaling figure 111-2) Impacts with respect to distance criteria are indeed significant. The required maximum of 2.0 miles is not mitigated by sprinkler systems in the homes when the EMT, the rescue ambulance is needed.

#### **IV.J FIRE PROTECTION**

##### **LONG – TERM IMPACTS EMERGENCY ACCESS / EVALUATION**

On page IV.J-8, second paragraph, it is stated “The potential funneling of evacuating traffic from Development Area A to a single access point could result in congestion and possible conflicts with entering emergency vehicles.” HOW TRUE! This statement also applies to Hillhaven Street which is the traditional route for emergency vehicles to homes in Enfolding Hills, ie, Amoret and Estepa Drive into Crystal View Estates and of course the egress for those places. The proposed alternates of Verdugo Crestline Drive or Inspiration Way each join up with Hillhaven and would thus impede emergency access to/from Estepa Drive, et al. Add this to the inadequacy of the two candidates and it is obvious neither is acceptable, hence the whole project DEIR must be rejected.

#### **IV.J FIRE PROTECTION**

##### **LONG – TERM IMPACTS FIRE HAZARDS**

These last two sentences on page IV.J=8 are puzzling. “Also, the LAFD has received preliminary plans for the proposed project and would again review the plans prior to approval of the vesting tract map. This would ensure that adequate fire protection facilities would be provided, particularly in light of the project site’s location within a VHFHSZ, and that new or expanded fire protection facilities would not be necessary.” It seems the developer has anticipated the LAFD’s approval before the review has taken place. After the October fires and various fire officials post-fire admissions that they lacked resources and politicians and other officials recommending a review of hillside and forest land development practices, how could the LAFD be expected to bless this project. The project would put homes now existing at risk by draining resources. The FIRE PROTECTION HANDBOOK, Fourteenth Edition, by National Fire Protection Association, in chapter 12, section 5 titled “Forest, Brush & Grass Fires” under “Fire Control Operations” advises “Frequently, when insufficient forces are available at the early stages of a fire, the decision must be made to abandon certain areas in order to prepare a more efficient stand further back.....”. This is what the fire fighters did in the arson fire started at the 2 Freeway, giving up many homes.

## **IV.J FIRE PROTECTION**

### **LONG TERM IMPACTS LAFD REVIEW**

Based on the preceding cumulative comments, the following statement, "proposed project's operational – related impacts to fire protection and emergency services would be less than significant," is not valid.

### **MITIGATION MEASURES J.1-3 Through J.1-16**

It was indicated in the prior hearings on the DUKE DEIR that recommended mitigation measures are not mandatory. These should be labeled mandatory in the next revised DEIR. It is not clear if J.1-3 through J.1-16 apply to emergency egress road or to just the road within the project. This should be clarified.

### **MITIGATION MEASURE J.1-18**

Homeowners associations were also mentioned in section III as performing fuel modification and in J.1-18 clearing or thinning the brush in adjacent areas under the Supervision of the LAFD. This invites the following questions:

- Where are these associations defined?
- Who sets them up and pays for them?
- Are they in play before any homes are developed through perpetuity?
- Who takes care of the adjacent property if there is no homeowner's association? After all this is just a recommended mitigation.
- What guarantee is there that the LAFD will supervise brush clearing on adjacent property.

Experience on Estepa Drive and in Saugus suggests mitigation J.1-18 will not materialize.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Implementation of the so called mitigation measurers will have little impact on a Santa Ana condition fire storm. The impact of this development on fire protection has the potential to be disastrous.

*William C. & Marva M. Grove*

William C. & Marva M. Grove  
7162 Estepa Drive Tujunga, Ca. 91042



December 21, 2003

Re: Response to Canyon Hills Project (EAF NO. ENV-2002-2481-EIR) EIR NOP

Ms. Zaitzevsky:

We are writing to express our concerns re:

*Density:* The designation "open space" is a misnomer. At this time, there is no land being dedicated or deeded as permanent open space (OS); therefore we can assume that a proposal for development in the OS area will be in the offing shortly. Because of the density proposed for parts A and B, precedent will be set with this designation and not only the remaining 600 acres will easily acquire this intensive zoning, but all surrounding acreage as well. It is our opinion the resulting impact will be significant on infrastructure such as police, fire, and recreational services. With this in mind, we believe the developer should now be required to set aside land to accommodate the future demand for services.

*Fire Response Time:* Because the issue of fire is of critical concern in the mountain/hillside districts and the fire department considers the existing facilities inadequate to attend Canyon Hills, both the density and the number of units should be revisited.

*Recreation:* Recreational opportunities will be inadequate for residents of the 280 homes. When recreational opportunities are lacking, youngsters gravitate to unsavory activity (even youngsters from affluent homes). And it is in fact difficult to reach or participate in recreational activity on hillside acreage. We therefore suggest that the developer be required to provide parkland for this hillside community.

*Traffic:* We do not dispute the existing traffic figures compiled by the department. We do however have some concerns regarding future traffic projections and the impact on the existing canyon neighborhood. Apparently calculation formulas for projected traffic in hillside areas has not changed in the last 30 years or so, as 9-10 trips per day was the figure suggested in those years. We are concerned, however, that the numbers do not adequately reflect present service vehicle trips per day. For example, trash pickup in the city of Los Angeles is now accomplished by 3-4 trucks instead of the original single truck; and the omnipresent "2-3 cable repair trucks" visit our Shadow Hills neighborhood on a daily basis as do the services of gardening and housekeeping that are required for maintenance of the homes of two income families. By themselves, these numbers do not represent a significant impact, but multiplied in relation to 280, we believe the cumulative figure will affect both the traffic and level of noise in this semi-rural/rural canyon area significantly.

*Open Space:* The issue of open space designation proposed for the Canyon Hills Development leaves many questions unanswered. For example, what is the future for this area described as open space (OS)? Who will own it? Who will maintain the fire buffers required by the fire department? Are there existing plans for future development or will the open space be someday converted to public parkland? Can this acreage be closed to the public due to issues of liability or for any other reason? Will the Canyon Hills Homeowners association want this acreage as a liability in perpetuity?

Andrea and James Gutman  
10511 Mahoney Drive  
Sunland, Ca. 91040

2-20-03

Subject: Re: Entail to Whitebird  
Development DEIR

To: Mayor E. Zaitensley  
City Planning

From: I. Louis W. Harber  
7079 Highland  
Turkey, Ca 91042

Qualification: Retired LAPD  
Capt. Four yrs in  
charge of traffic  
enforcement in Valley

The finding in the DEIR that  
traffic will not be a significant  
problem is specious. The construction  
itself will create considerable  
disruption of traffic flow with  
trucks hauling dirt & heavy  
equipment.

The high density housing  
may create up to four vehicles  
per dwelling using La Tuna  
Canyon Road, plus service and  
visiting vehicles.

Respectfully,

11

development violates virtually every agreement we have with our politicians, from grading ordinances to the environment.

Respectfully,  
Alicia Harber

**Louise Henshaw**  
**6616 St. Estaban Street Tujunga, CA. 91042**  
**818. 353.2659**

December 21, 2003  
Maya Zaitzevsky, Project Coordinator  
City of Los Angeles Department of City Planning  
200 N. Spring Street, room 763  
Los Angeles, CA. 90012  
Ref: Canyon Hills Project, EIR Case #ENV2002-2481  
Ref: NasSCH #200209-1018

Dear Ms. Zaitzevsky:

I have lived at my present address for 54 years as of January 2004. We moved here to raise our family in the rural atmosphere.

I do not believe that the Canyon Hills developer should be able to exceed the present restrictions on building in this area.

The impact of more than tripling the number of homes would be destructive. We already have inadequate police, fire and emergency facilities. The destructive grading of hillsides, removal of 425 Live Oak trees, the extra noise, high density housing, increase in traffic congestion, increased demand for schools, and public services, are only a few of the unfavorable aspects that are not addresses in this EIR draft.

We need a new EIR report that is adequate and unbiased.

Sincerely,

Louise Henshaw

Rhonda Herbel  
7647 McGroarty St.  
Tujunga, CA 91042

December 29, 2003

Ms. Maya E. Zaitzevsky, Project Coordinator  
Department of City Planning  
Environmental Review Section  
200 North Spring Street, Room 763  
Los Angeles, CA 90012-2601

Re: Canyon Hills Draft EIR  
ENV-2002-2481-EIR  
SCH #2002091018

Dear Ms. Zaitzevsky:

Please accept these comments on the above-referenced DEIR of the proposed "Canyon Hills" project. I am a resident of Tujunga since 1995, and of Southern California since birth. I work in, and commute daily to and from, West Los Angeles since 1993.

Maybe the consultants were under too much time pressure or maybe they have prepared so many of these documents that they have lost the necessary objectivity in ensuring that each one addresses the unique facts and circumstances surrounding each individual project and environs when evaluating the potential impacts. I hesitate to think that they were aiming for the subjectivity achieved in much of this lengthy and somewhat boilerplate document. The sheer volume alone seems intended to overwhelm rather than inform. One must constantly go back and forth between different sections to find the contradictory data and omissions. It must exceed the CEQA guideline of 150 pages; or does the size of this DEIR imply that it is a project of unusual scope and complexity; that is possible I suppose.

Yet, despite the volume, it fails to focus on some important aspects of the environmental setting, and some of the most potentially adverse impacts. It's also as though sections of this document were taken from another project document, and then just sewn together for this one using similar language and substituting project specific maps and some other references. Every impact assessment seems to end with the standard dismissal of "not significant" based on speculation and supposition, not with a reasonably measurable correlation between the mitigation measure and the anticipated reduction in the impact.

Although I do not possess a background in law, I do possess the ability to read and to reason and I naturally had to very quickly acquaint myself with the fundamental concepts and purpose of this review process. I realize that the DEIR is not held to the standard of perfection, but to that of adequacy in exploring potential impacts and informing the public and the governmental decision makers. Fair enough. However, based on my research, I expected a more objective discussion of facts and circumstances. What I