

**“IV – I. TRANSPORTATION/TRAFFIC”**

*This section of the DEIR does not consider all traffic into and out-of the proposed project site. It also does not consider speed and safety issues.*

The DEIR considers resident traffic only. It does not consider the additional traffic which inevitably comes from:

1. Lawn maintenance services.
2. Pool service.
3. Food delivery.
4. Delivery services such as UPS and Federal Express.
5. Postal service vehicles.
6. Law enforcement and parking enforcement.
7. Private security patrols.

The DEIR considers only the amount of traffic on the feeder roads. It does not consider speed and safety issues.

Residents will testify that La Tuna Canyon Road is a very dangerous road with a serious speeding problem. Even if the new traffic loads might seem low on a spread-sheet, the reality is that given the speeds of vehicles on the road now, the danger of increased load will have a much greater danger than the DEIR states.

The DEIR also fails to consider the increased number of bicycles on the road as a result of this development. Bicycle lanes, and bike safety are ignored by the DEIR.

**“V. GENERAL IMPACT CATEGORIES, B. Significant irreversible environmental changes”**

*The DEIR fails to mention the death, displacement of wildlife in the area. Once this land is taken, it will never be returned to the animals. The habitat destruction is irreversible.*

## **OTHER ITEMS DISCOVERED**

### **1. Misleading Photographs**

Figure IV.F-3: These photographs are intentionally taken in such a way as to:

- a) Mislead the public and decision-makers to think that the habitat destruction will be limited to a small area.
- b) Mislead the public and decision-makers into thinking that “typical” views feature many homes, whereas the actual area is largely undeveloped. The photographs intentionally have the few existing homes featured prominently – I imagine this is to mislead the reader into thinking that the project area is not “really” in a wilderness area.

### **2. DEIR restrictions and resolution problems**

As stated earlier in this letter, the DEIR has low-resolution figures, maps, and illustrations such that the public cannot read, comprehend or comment on the data in these sections.

Also discovered is that the DEIR Adobe Acrobat files have been “copy protected” such that any member of the public who wishes to sight sections of the DEIR in their comment letters must “re-type” any text from the DEIR. My suspicion this was done as an intentional move to obstruct and dissuade the public from commenting on the DEIR.

### **3. The applicant is a secretive, illusive, and uncooperative**

My efforts to contact the applicant get clarification on DEIR issues have been met with intentionally incorrect addresses, un-returned phone calls, and intentional evasion.

SUMMARY AND OPINION:

1. I believe the DEIR to be incomplete, inaccurate, and poorly presented to the public.
2. Most importantly, the DEIR does not adequately state the true impact of the proposed development. It is particularly weak in the area of "cumulative impact".
3. In my opinion, the rural charm and appeal of the area will be destroyed by this development.
4. The natural habitat will be permanently destroyed, meaning the death or displacement of hundreds of animals and the loss of many beautiful trees.
5. In my opinion, the destruction of this habitat will forever destroy the natural beauty and majesty of this rare un-developed part of Los Angeles. This devastating loss will forever affect current residents of the area, hikers, mountain bikers, naturalist, and most importantly the animals themselves.
6. The proposed development is not consistent with applicable Community Plans, despite the DEIR statements to the contrary.
7. In my opinion, being an avid hiker of the Verdugo mountains, and a life-long resident of Los Angeles, this proposed development site is NOT suited for this type of development. This land serves the public and the city best if it is left just as it is now or re-classified as a natural preserve.
8. I strongly recommend that all permits and approvals be denied until such time that an honest and comprehensive EIR is produced by the applicant, and it's true impact be considered by the Los Angeles City Planning Department and the public.

Thank you kindly for reading this letter and considering its content.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sam", with a long horizontal flourish extending to the right.

*This letter was mailed on December 24, 2003 via First Class Certified US MAIL.*

Rick Pruetz  
6 Fleet Street, #301  
Marina Del Rey, CA 90292  
[arje@attglobal.net](mailto:arje@attglobal.net)

December 13, 2003

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

SUBJECT: COMMENTS ON CANYON HILLS DRAFT EIR

The project site is within the Verdugo Mountains Significant Ecological Area (SEA) as identified in Los Angeles County's 1976 SEA Study. However, as far as I can tell, the DEIR does not mention this. Even though the SEAs are a County rather than a City concept, the DEIR should nevertheless let the public know that the project area was one of only 61 sites in the entire county that met the County's selected criteria. To quote from that study, the location of the Verdugo Mountains "...makes them important for scientific study, genetic interchange between otherwise isolated populations, and recreation to urban residents." "The area serves as an island refuge, providing what remains of a link between plant and animal populations found in the Santa Monica and San Gabriel Mountains. Genetic interchange, by way of this linkage is important in perpetuating the genetic variability in isolated populations, and consequently the maintenance of healthy ecosystems."

In not mentioning the project site's SEA status, relevant information is not given to the general public. Discussing this fact would raise awareness about the ecological significance of the Verdugo Mountains generally. And, given the importance of genetic interchange in this SEA, a complete discussion of the SEA would focus attention on the critical location of the Canyon Hills project site. This project site occupies much of the land between the bulk of the Verdugo Mountains to the south and the Tujunga Wash and the San Gabriel Mountains to the north.

Given the importance of wildlife connectivity at this location, I looked at Alternative B, which proposes no development south of the I-210. The analysis for that Alternative concludes that the "...impacts to wildlife movement under Alternative B would be the same as under the proposed project." In other words, according to this analysis, it will have no effect on wildlife mobility if the entire area south of I-210 is in open space or whether it contains homes that require wildlife to either filter through this neighborhood or follow the narrow corridor that leads to the La Tuna Canyon Wash. Once at the La Tuna Canyon Wash, the analysis asserts that wildlife will be equally inclined to proceed east along the

wash regardless of whether open space or homes are located north of the wash. I am having difficulty buying that conclusion. If the Final EIR maintains that Alternative B has no advantages for wildlife movement over the Proposed Project, it should support these conclusions by citing studies showing that residential development in these relative locations would not discourage wildlife movement.

I recall that the Santa Monica Mountains Conservancy is trying to assemble a right of way for a Rim of the Valley Trail system. I apologize for not doing my homework on this, but what land is proposed to serve as the connector between the Tujunga Wash and the Verdugo Mountains for this Rim of the Valley Trail? If the route is already acquired somewhere else north of La Tune Canyon Road, please discuss that fact in the final EIR. If this segment of the Rim Trail is still unresolved, please discuss why it could not be incorporated into the portion of the site south of the I-210. If in fact this area would make an appropriate route for the Rim Trail (as well as the wildlife connectivity discussed above) this would also seem to increase the relative benefits of Alternative B, putting all 280 homes north of the freeway and preserving everything south of the freeway for wildlife habitat and trail corridor.

Finally, the success of the open space component of this project will be affected by who owns and manages the open space. If this was mentioned in the DEIR, please let me know where this information is located.

Thank you very much for the opportunity to comment on the DEIR. I look forward to reading your responses.

Sincerely,

Rick Pruetz

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

December 22, 2003

Re: Canyon Hills Project  
ENV-2002-24-EIR  
SCH#2002091018

Dear Ms. Zaitzevsky:

With respect to the DEIR, neither the Transportation Traffic Section nor the School Segment mention the traffic involved in bringing children to and from school. It also does not talk about students of age driving to and from high school, back and forth to fast food outlets for lunch and just driving around with girl and boy friends after school is over.

Taking the very low and unacceptable figure of 126 new students from this and the Duke project, the driving to and from schools could create as many as 126 vehicular trips at the peak hour in the AM on La Tuna Canyon Road and the 210 Freeway with again that many trips in the middle and late afternoon. The two Congestion Management Plan stations cited in the DEIR are actually miles away from the Canyon Hills project and, in my opinion, in no way present a complete picture of this project's potential impact on traffic! The proposed placing of a traffic signal at the intersection of the 210 westbound off-ramp and La Tuna Canyon Road will do little to relieve traffic at that location, merely back it up, and nothing at all to stem the flow on streets such as Foothill Blvd., Mt. Gleason Avenue, Tujunga Canyon Blvd., or Apperson Street, to name a few.

What if most of those high income married people who purchase these expensive homes have, on the average, two children between the ages of 5 and 17 resulting in about 400 or more of school age?? Remember, the elderly, the young and the single will not be able to afford these homes! Will one traffic signal on La Tuna Canyon Road at the 210 Freeway be sufficient to stem the tide of several hundred trips daily to and from schools, one of which is already over its maximum capacity? Not to mention the increased vehicular activity from people going to work, more delivery and maintenance vehicles! Some children may seek to be admitted to Glendale schools which are filled to the brim now. Will that affect traffic on the 210 freeway east-bound, Honolulu Avenue and Foothill Blvd in the La Crescenta area? No comment on this very real possibility in the DEIR!!

Finally, will this be the only project? Will these homes attract others? Will schools and infrastructure be paid for by the developers? How about increased public services such as fire, police, street repair, trash collection and so on? How about water supply, new trash dumps, public transit? Let's reconsider this whole proposed project with the entire community in mind and seek legal ways to disallow it. Thank you.

Sincerely,



Anne Radogna  
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La Crescenta, CA 91214-1026

LOS ANGELES CITY PLANNING DEPT.  
MAYA E. ZAITZEVSKY  
200 NORTH SPRING STR.  
LOS ANGELES, CA 90012

Comment Letter No. 172  
Attachment 172ddd

**RE: ENV-2002-2481-EIR; SCH #2002091018  
CANYON HILLS PROJECT- DEIR COMMENTS**

FROM: RAYMOND ROLDAN  
8243 OSWEGO, SUNLAND

TO MS. ZAITZEVSKY:

I bought this home with the intention of moving away from congestion, noise pollution, light pollution and air pollution. I sought a home here because it is close to the mountains which are unchanged, offering a view unsurpassed in appeal. I appreciate the rural, community feel and intend to live the rest of my life here in this area of special beauty and aesthetic value.

I am horrified to learn that the Canyon Hills Project plans to destroy the current ridgelines and add such pollutions as I intentionally sought to leave behind. The following are my comments on the DEIR issued by this above mentioned project as there are obvious failings in its findings. Being a Contractor with a California issued license of twenty years, I have some knowledge as to the impact this project will have on my community of Sunland-Tujunga.

The immediately suspicious note I can make on the Canyon Hills DEIR is that the project applicant's address is incorrect as it lists a public relations firm address. As a contractor who works with other professionals, listing a public relations firm is a red flag for subversive actions and misleading communication.

CONCERNING IV: ENVIRONMENTAL IMPACT ANALYSIS  
BIOLOGICAL RESOURCES

SECTION: AESTHETICS:

As a citizen expert and a contractor with years and years of experience, it is my professional opinion that the Canyon Hill DEIR presents thousands of inconclusive statements and observations/findings. The DEIR is deficient on information pertaining to the development / destruction of the ridgelines currently a source of great pride to the community of Sunland-Tujunga, La Tuna canyon and Shadow hills.

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RE: ENV-2002-2481-EIR; SCH #2002091018  
CANYON HILLS PROJECT- DEIR COMMENTS

FROM: RAYMOND ROLDAN  
8243 OSWEGO, SUNLAND

SECTION: AESTHETICS: RIDGELINES:

That this item is insufficiently addressed in the DEIR brings the project into question as to its awareness of the negative impact it would probably have on the surrounding communities.

Being a homeowner with friends and family currently residing in Sunland-Tujunga, we all know that the value of our homes are based strongly on the aesthetic views we currently have of the surrounding ridgelines and mountains.

The DEIR does not offer coherent or sound information on the negative impact to property values once the ridgelines are compromised. Also not sufficiently addressed is how the completely differently constructed homes act as a comparison factor to the older, more historical houses currently present in the area surrounding the proposed project.

Having been a contractor on housing projects, I personally know that their value is created not actual. I also know that there is nothing more appalling than an area of unique, varying and individual looking homes being impinged upon by cookie-cutter look alike homes right down the street.

Our community homeowners take tremendous pride in finding an older home and renovating it to bring aesthetic beauty to the street and ultimately to the community. Track housing, which is honestly what Canyon Hills project is, presents a complete departure from homeowner pride in ownership and beautification.

The impact of aesthetically disastrous track housing on the community of Sunland-Tujunga was not addressed and should be as an environmental concern. Also defective in the DEIR is any reporting of the impact of the McGroarty road area, which happens to be where my child attends private school. Suspiciously enough, some persons just bought the land behind the school up to the ridgeline back to back of project. And word is out that a suspicious number of land purchases are being made bordering on this proposed project site.



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RE: ENV-2002-2481-EIR; SCH #2002091018  
CANYON HILLS PROJECT- DEIR COMMENTS

FROM: RAYMOND ROLDAN  
8243 OSWEGO, SUNLAND

SECTION: ASTHETICS:

I can only assume the land purchases are slotted for access to the project. If so, there are not currently any definitive study results within the DEIR addressing use of residential streets as access to the proposed project and the possibly negative impact on the residents, their children, and their pets of these areas. Of special note are the numerous peacocks, which roam the Mc Groarty area on behest and supported by local residents as a desired and welcomed addition to their unique neighborhood.

Of special note and insufficiently addressed or completely missing from the report is the impact of loss of ridgelines which currently shelter miles of homeowners from excessive winds which historically pass through this area. The cumulative effect of loss of ridgelines is inconclusive on the impact to trees being buffeted by winds that they have not grown up to withstand. The cumulative effect of property damage by such excessive winds does not appear to be addressed adequately.

CANYON HILLS PROJECT AS A GATED COMMUNITY:

The Canyon Hills DEIR has insufficient information on the environmental impact of this being a gated community. That such a significant factor is not adequately examined and presented, renders the DEIR report tremendously suspect.

Where in the DEIR was any assessment made to justify gating a community on top of an open, rural, cohesive community as Sunland-Tujunganga??? The implications to Sunland-Tujunganga, with its retired individuals, its baseball teams, its YMCA, its nature observers, hikers, church-going individuals is that they are criminals. And must be kept out of an area which they will incorporate into their backyard. A gated community is SEPARATE and the impact of that separation to a united community was inconclusive in the DEIR.

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RE: ENV-2002-2481-EIR; SCH #2002091018  
CANYON HILLS PROJECT- DEIR COMMENTS

FROM: RAYMOND ROLDAN  
8243 OSWEGO, SUNLAND

CANYON HILLS PROJECT AS A GATED COMMUNITY:

With Sunland-Tujunganga being an open community and plopping a gated community on top of us, there is potential destruction to the current heartfelt cohesion and cooperation we currently live with as members. Which as a cumulative effect, could actually ENCOURAGE criminal behavior once the community cooperative awareness and support is compromised by the implications of surrounding criminality.

The Canyon Hills DEIR is completely deficient in its findings on how being a gated community would impact the community it plans to be a part of.

SECTION: NOISE:

This is an area I have particular insight and knowledge. Construction sites are notoriously invasive with their noise pollution, dust pollution and excessive unknown individuals working within/servicing the project site.

The DEIR is inconclusive in its findings on the impact of so-called sound walls. As a contractor, I personally know that sound walls are insufficient for blocking or even muting noise from bulldozers, jackhammers, regular hammers, chainsaws or any other construction type tool/vehicle used for construction.

The DEIR is insufficient in its conclusions reached about the noise of incoming, outgoing trucks, vehicles, tracker-trailers and worktrucks transversing any or all local roads leading to and from project site. Having witnessed the renovation of a simple schoolyard and it's hundreds of trucks on my residential road, I feel I have particular insight as to how destructive and unpleasant the noise levels are accompanying these vehicles. That the DEIR does not address the cumulative effects of years of this noise level being present means that the report should be re-issued as it appears to insufficiently address multiple issues pertaining to this project.

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RE: ENV-2002-2481-EIR ; SCH #2002091018  
CANYON HILLS PROJECT- DEIR COMMENTS

FROM: RAYMOND ROLDAN  
8243 OSWEGO, SUNLAND

SECTION: AIR QUALITY

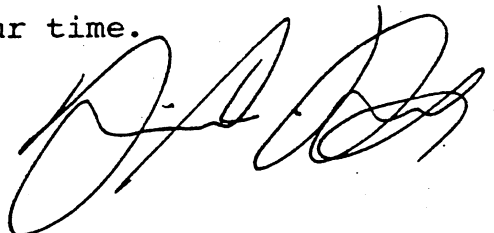
To reiterate, as a contractor, I have intimate experience on what construction sites do to their surrounding environment. The DEIR gives incoherent analysis on air quality impacts. I refer specifically to the sheer amount of dust that would accompany this building project. No walls are high enough to contain dust. Period. In addition, the hundreds of acres being denuded of vegetation was not sufficiently researched of its contribution to air pollution. Making roads will cause tremendous dust since tires lift up the top layers even if wetting is done, and no contractor wants to clean the excessive mud from the tires.

The DEIR is remiss in revealing its intentions to control dust adequately. "Adequately" being relative. How much water is intended to be used? Where and how often? Can the water trucks even reach the areas to be contained? Most water trucks cannot go where bulldozers go.

Local residents are knowledgeable and familiar with the high wind velocities that sweep this community. A little watering to settle dust is no guarantee of continuous containment of that dust. The most adverse effect of 10-20 expected years of construction on such a large site is on the individuals who seek this area as an asthmatic retreat. Sunland-Tujunga has immense historical value based on its air quality. As a whole, the DEIR is criminally vague on the cumulative impact to this community's commercial value to house, heal and cure asthmatics.

I appreciate your attention on this matter and ask that the City hold the Canyon Hills project accountable for insufficient reporting, inaccuracies in the DEIR or departure from the Scenic Plan. Please request the Canyon Hills Project RE-ISSUE the DEIR. I sincerely hope the City Planning Department carefully considers my comments and the comments of my neighbors.

Thank you for your time.



December 18, 2003

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

Re: Canyon Hills Project—Electromagnetic Fields and effects on Cancer, etc.  
ENV-2002-2481-EIR SCH#2002091018

The conclusion in the DEIR section on hazards and hazardous materials, with respect to electromagnetic fields created by the Edison transmission lines traversing the housing project, is that, "the projects impact would be less than significant prior to implementation of the recommended mitigation measure."

The mitigation measure requires, for lots within 150 feet of the edge of the transmission line, that the developer provide an electromagnetic field, (EMF), information and disclosure statement to each prospective buyer and that the statement include the following:

- a) The location of the SCE transmission line
- b) The fact that the subject has been addressed in the EIR and is on file with the Department of Planning, Los Angeles
- c) That additional health information may be obtained from sources listed in the EIR basically the State Department of Health and the Internet

There have been a myriad of studies on electromagnetic fields created by power lines, home appliances, home wiring, etc. The DEIR refers to a report by the Special Committee of the National Research Council which reviewed 11 epidemiological studies relative to powerlines and childhood leukemia. They concluded that children living in such high configuration houses are 1.5 times more likely to develop childhood leukemia than children in other homes. They were, however, unable to explain this elevated risk and recommended more research. Your experts indicate that one explanation could be that houses with "high wire codes" have higher electromagnetic fields levels but may "also be a proxy for some type of exposure besides magnetic fields that is not yet understood." What does that statement mean?

A 1997 National Cancer Institute report found no association between living in high wire code houses and childhood leukemia but children did have higher rates of cancer in general.

In 1998 a group of experts gathered together by a federal agency reviewed the research on possible EMF health risks. A majority of this panel felt that the epidemiology studies of childhood leukemia provided enough evidence to classify EMF as a "possible human carcinogen", meaning, from the person writing the DEIR, that it MIGHT cause cancer but it does not mean that it DOES cause cancer???

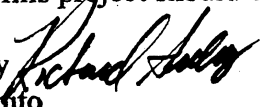
The final report in 2002 was conducted by three experts who reviewed the most relevant existing scientific literature, discussed it with peer reviewers and contracted with various specialists to make sure the literature was up to date through June 2000. While there were some important differences, the scientists were more inclined, in some cases significantly more inclined, to believe that EMF exposure increased the risk of certain health problems, more so than other groups such as the British National Radiological Protection Board and the National Institutes of Environmental Health Sciences Working Group!! These three scientists were also inclined to believe in varying degrees that EMF can cause some unspecified degree of increased risk of childhood leukemia, Adult brain cancer, ALS and miscarriage. One scientist strongly believed that EMF contributed to childhood leukemia while another believed that EMF can contribute to adult brain cancer.

The writers of the DEIR downplayed these reports with such comments as, "No significant impacts associated with developing homes in proximity to the Transmission Line Right of Way (ROW) have been identified." And, "existing EMF exposure to existing homes along the Transmission ROW would not be increased or diminished by development of the proposed project."

My research uncovered about 90 articles, pro and con, respecting EMF and its connection to cancer and leukemia. One study by a Dr. David Savitz, an epidemiologist, found that Electric Utility workers with high exposure to magnetic fields were more than twice as likely to develop brain cancer as those with lower exposure. A UCLA epidemiologist praised the study stating that "it's a well designed and executed study." Published research by Dr. James Trosko, a professor of pediatrics and human development at Michigan State University indicated that EMF, similar to those found in overhead power lines, can have a biological effect on human cells, an effect that could contribute to the complex cellular process that leads to cancer. Other studies claim that EMF bears no relation to cancer or leukemia.

In conclusion, the DEIR writer's rather ludicrous mitigation factors lead me to believe that, despite the controversy, even they believe there is a danger, some danger of childhood leukemia, childhood cancer, and adult brain cancer infecting the people who may purchase these homes. While there appears to be no out and out, set in concrete proof that electromagnetic fields cause cancer and/or leukemia, there is enough evidence to show that, among other things, children are especially vulnerable to EMF radiation. Therefore, the powers that be should indicate, in no uncertain terms, that building homes under or in reasonable proximity to overhead power lines should neither be advised nor accomplished.

This Canyon Hills project should be totally reconsidered. Thanks for your consideration.

Richard Seeley   
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La Crescenta, CA 91214-1026  
(818)248-1793

December 19, 2003

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

Canyon Hills Project—ENV-2002=24-EIR SCH#2002091018

One of the major defects, and perhaps the major defect, in this DEIR is that it does not address the fact that the ecological balance of Nature in the project area will NEVER again be achieved. When the digging starts, insects, rodents, reptiles, birds and animals will flee for their lives. Some will die or be killed on the spot, others will die or be killed attempting to escape, while some will successfully escape their natural homeland and be gone forever.

The attempts, in the DEIR, at “mitigation”, all the varied concerns about flora and fauna, and all the illogical writing that the movement of 125 million cubic feet of earth, the uprooting of nearly 300 native trees and their replacement, by and large with acorns, the addition of more than 3000 daily vehicle trips, the elimination of hiking, equestrian and biker trails, and the carving away of ridgelines, will have little, if any SIGNIFICANT impact on the La Tuna Canyon area are for naught. Example: Page I-16, paragraph 2; 259 acres of mixed chaparral will be permanently impacted. However, “mixed chaparral is not listed as a Rare Natural Community. Therefore, impacts to mixed chaparral is considered adverse, but is not considered “SIGNIFICANT.” The same faulty thinking is taken with about 19 acres of deerweed, chamise chaparral, coastal sage scrub, et,al the destruction of which is not SIGNIFICANT. Further, although nearly 300 acres of its habitat will be excavated or otherwise damaged, there will be no SIGNIFICANT impact to the San Diego coast horned lizard, the silvery legless lizard, or the orange throated whiptail!!

While some of Nature’s creatures will remain in surrounding areas, the peaceful, pristine nature of La Tuna Canyon or Canyon Hills will be replaced with more vehicles, more pollution, both air and water, more noise and, more importantly, more people at a time when reason dictates that we attempt to stabilize population, not increase it!

In addition, the grading and scarring of the hillsides in the canyon and especially the construction of access bridges across the canyons off La Tuna Canyon Road will completely despoil the aesthetic and pristine nature of the La Tuna Canyon forever.

The citizens of L.A. County and the State of California are presently facing a decrease in public services, overcrowded and, in some areas, dilapidated schools without textbooks and other supplies, infrastructure in need of attention, in some cases immediate attention, potable water in ever decreasing quantity, an increasing shortage of agricultural land due primarily to overdevelopment, near traffic gridlock, a total lack of adequate alternative forms of transportation, and a lack of respect for the physical environment including increasing air, water and ocean pollution!