



Shadow Hills Property Owners Association

Dedicated To Preserving Rural Community

December 20, 2003

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

RECEIVED
CITY OF LOS ANGELES

DEC 24 2003

ENVIRONMENTAL
UNIT

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

Ms. Zaitzevsky,

We find several aspects of the cultural, archeological and paleontological surveys of the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") to be inadequate.

References in the body of this letter come from the DEIR IV-O and Appendix L. Cultural, archeological and paleontological records reviews were conducted through a variety of information sources seeking any references to recorded resources on or within ½ mile radius of the Project Site. This records check revealed no presence of these reviewed resources. Mention was made in the DEIR of two prior field surveys that had assessed "portions of the property." The DEIR did not clarify what constituted "portions of the property", failed to define the nature of the items sought nor provided even the slightest indication of how thorough these "assessments" were. The DEIR mentioned five additional field surveys conducted on adjoining parcels, however references to these assessments were no more complete than those for the project site itself. A two-day field survey of the project site was conducted on July 24/July 25, 2001. Quoting the DEIR: "This was necessary to determine the current status of previously recorded cultural resources and to document any prehistoric or historic sites or features which have not been previously recorded." "Because of the lack of a previous survey over the entire 887-acre of the project site, it was prudent to conduct a survey of the project site in order to determine if any cultural resources would be impacted during the construction phase. Only those portions of the parcel possessing an angle of slope of fifteen degrees or less could be examined. The survey was conducted by two field persons walking parallel tracts approximately ten meters (30 feet) apart over all accessible portions of the property. Access to much of the project site was limited due to private roads, lack of access from I-210 and overall ruggedness of the project site. More than two-thirds of the project site is located on slopes greater than 15 degrees. It is highly unlikely that

58-1

archeological remains would exist in these locations. A total of less than **fifty** acres was accessible. No cultural remains, either prehistoric or historic, were noted in those portions of the project site where access was possible." Fifty acres? What happened to "because of the lack of a previous survey over the **entire 887-acre of the project site it was prudent to conduct a survey of the project site**". I am not the worlds greatest mathematician, but:

50 acres surveyed/887 total acreage = X% project site surveyed/100%
 X% = approximately **5.7%**

58-1

Even considering nothing more than the Development footprint acreage:

50 acres surveyed/194 acres Dev. A + Dev. B = X% development footprint surveyed/100%
 X% = slightly less than **30%!**

58-2

58-3

58-4

58-5

5.7% (or even 30%) hardly constitutes a thorough cultural or archeological survey of the site. Additionally, the archeologists conducting the field survey did not indicate whether they disturbed any earth looking for artifacts that might be buried. There should have been some field search, however simplistic, for buried artifacts in areas which may have harbored human habitation or nomadic hunting/gathering camps – however unlikely they may be. The paleontological survey should also be expanded to include a number of cuts or bores in areas of potential fossil bearing strata. If access to even just the development footprint of the acreage is so limited **on foot**, one can not even begin to imagine the magnitude of grading that the Canyon Hills Project will require and the immense impact this grandiose operation will have in this otherwise environmental island of nature encircled by the City of Los Angeles.

While perhaps not listed on any official historic register, the Cross of San Ysidro has been of great historic significance to the residents of the Sunland-Tujunga Valley. The Cross was named in honor of San Ysidro, the Patron Saint of Little Homes, which held great significance to the early inhabitants of Tujunga known as the Little Landers. (Sunland and Tujunga from Village to City, Marlene A. Hitt, Pgs 111-113). While itself not located directly on Canyon Hills property, the original trail walked annually since 1923 for the Easter Sunrise Service does cross the property. Many people today still walk this trail for this annual event and fear that Canyon Hills may eventually block this original access. The Cross, being on adjacent property, also should classify as Cumulative Impact of a historical resource.

While noted mitigation measures for cultural resources are standard and the best one can expect once grading has commenced, it is obvious that by the time an unearthed resource is recognized, the damage done to the site by the large earth-moving equipment would be irreparable. It is for this reason that the inadequacy of this cultural survey is unacceptable.

