City of Los Angeles or greater, with all the development in the San Fernando Valley that is expected, this landfill may be at capacity in 2009 or later years. If the Sunshine Canyon Landfill is at capacity by the time the development becomes operational or at any time after it does become operational, it will have a significant impact under CEQA. It is a serious omission to omit this information from the EIR. This omission might result in a different finding about the project's impact on solid waste.

The applicant should be required to contribute his fair share toward the acquisition and construction of new solid waste disposal facilities as the current landfills have a limited life.

The Duke EIR, though there were only 41 units proposed, about 1/7 the size of the Canyon Hills development came to a very different conclusion of about the project's impact on solid waste. In the Duke EIR it says, "Project implementation would result in the generation of approximately 9,300 pounds per month of solid waste. **The solid waste generated by the proposed project during its operational life would add to the demand for long-term waste disposal facilities, and incrementally reduce the available capacity of those landfills. As landfills are a finite resource, any new sources of solid waste generation may be considered significant."**

Section L did not discuss any impacts that this project may have on telephone, cable, or other communication services. These must be stated in the EIR. If there is no impact, this must be stated too.

Chapter 9 of the General Plan of Los Angeles states about these services, "Telecommunications is an emerging field with the potential to significantly alter the way Southern Californians communicate, work, and commute. The concentration of business and population in the City of Los Angeles and rapid technological advances offer the opportunity to provide an integrated network serving as the regional hub for public and private users. Following the 1994 Northridge earthquake, the use of telecommunications expanded significantly as traditional travel corridors were closed, demonstrating the potential for such use." This is an important omission from a development that should be modern and seek ways to reduce traffic flows in and out of this development.

Section IV. M.1. HAZARDS AND HAZARDOUS MATERIALS-ENVIRONMENTAL SITE ASSESSMENT

Though the DEIR does discuss the current inventory of potential environmental hazards on site and future environmental hazards on site after the development is built, it fails to identify, discuss, and recommend mitigation measures for the site during the construction period.

During the site preparation, grading, construction of the infrastructure, and buildings, there will be machines that might require the use of hazardous materials and hazardous materials used during this process. **The DEIR discusses in several places the possibility of blasting on site. Yet, the report does not discuss the proper handling and storage of dynamite.** There are other materials

used in the construction process that could be hazardous. These potential materials need to be identified and mitigation measures must be recommended for the safe storage and use of these materials.

As there will be construction equipment that will be used, it would be expected that fluids associated with these machines such as gas, oil, lubrication fluids, and other materials that could be potentially hazardous that will be stored on site. Again, a discussion of what these materials may be and mitigation measures must be recommended for the safe storage and use of these materials.

Mitigation for hazardous materials stored on the site during construction must include proper storage and securing of these materials to avoid leaks, theft, spills, or other release of these materials into the area. The consultant has not even proposed having an emergency plan that might help mitigate these effects of an accidental release of hazardous materials during construction.

The applicant must be required to clean-up or pay for the removal of any hazardous wastes that are found on the project site and any hazards, hazardous spills, or other problems involving hazardous materials as a result of construction activities or site disturbance.

Also, **if any hazardous materials such as dynamite will be transported through the surrounding community to the project site, discussion and identification of these materials and mitigation measures must be discussed in the EIR.**

If any materials are potentially carcinogenic or cause birth defects, disclosure must be made of those hazards. The DEIR must discuss these issues relating to expected hazardous materials. The DEIR must not comprise the safety of the residents and site workers due to inadequate disclosure.

U.S. Department of Human Services, Public Health Service,Agency for Toxic Substance and Disease Registry in their publication Managing Hazardous Materials Incidents Volume I, Emergency Medical Services, provide recommendations of aiding emergency response with hazardous materials.

Hazard Recognition

When dispatched to the scene of an incident, emergency response personnel may not be aware that the incident involves hazardous materials. As a result, emergency medical services personnel should always be alert to the possibility that they may be dealing with a chemically contaminated individual, and should ask the victims and dispatch personnel about the nature of the incident. Although an injury at a hazardous material incident need not invariably involve a chemical exposure (it could have resulted from a purely physical occurrence, such as slipping off a ladder), as a routine precaution, the involvement of hazardous materials should be considered a possibility in such situations. As outlined in the National Fire Academy/National Emergency Training Center Manual, Recognizing and Identifying Hazardous Materials, there are six clues that may confirm the presence of hazardous materials. These clues are included in this guidance document to facilitate and expedite prompt identification of any hazardous materials at the scene of the incident. Dispatch personnel, familiar with these clues, will subsequently find the communication with field personnel enhanced. For example, patient symptoms reported from the field-such as

nausea, dizziness, burning eyes, or cyanosis or cyanosis -could suggest to the dispatch staff the presence of hazardous materials. Knowledgeable dispatch staff could then request field personnel to examine the site for these six clues:

- Occupancy and Location. Community preplanning should identify the specific sites that contain hazardous materials. In addition, emergency personnel should be alert to the obvious locations in their communities that use hazardous materials - for example laboratories, factories, farm and paint supply outlets, and construction sites.

- Container Shape. Department of Transportation (DOT) regulations dictate certain shapes for transport of hazardous materials. There are three categories of packaging: stationary bulk storage containers at fixed facilities that come in a variety of sizes and shapes; bulk transport vehicles such as rail and truck tank cars that can vary in shape depending upon the cargo; and smaller hazardous materials that may be packaged in fiberboard boxes, drums, or cylinders with labeling.

- Markings/Colors. Transportation vehicles must use DOT markings, including identification (ID) numbers. Identification numbers, located on both ends and both sides, are required on all cargo tanks, portable tanks, rail tank cars, and other small packages that carry hazardous materials. A marking system designed by the National Fire Protection Association (NFPA) identifies hazardous materials at terminals and industrial sites but does not provide product specific information. This system uses a diamond divided into four quadrants. Each quadrant represents a different consideration: the left, blue section refers to health; the top, red quarter pertains to flammability; the right, yellow area is for reactivity; and the bottom, white quadrant highlights special information. In addition, a number from zero through four indicates the relative risk of the hazard with zero being the minimum risk.

- Placards/Labels. These convey information by use of colors, symbols, Hazard Communication Standard, American National Standard Institute (ANSI) Standards for Precautionary Labeling of Hazardous Industrial Chemicals, United Nations Hazard class numbers, and either hazard class wording or four-digit identification numbers. Placards are used when hazardous materials are in bulk such as in cargo tanks; labels designate hazardous materials on small packages.

- Shipping Papers. These can clarify what is labeled "dangerous" on placards. They should provide the shipping-name, hazard class, ED number, and quantity, and may indicate "waste" or It poison." (Shipping papers must accompany all hazardous material shipments.)

- Senses. Odor, vapor clouds, dead animals or dead fish, fire, and irritation to skin or eyes can signal the presence of hazardous materials. Generally, if one detects the odor of hazardous materials, one should assume that exposure has occurred. Some

chemicals, however, can impair an individual's sense of smell (i.e., hydrogen sulfide), and others have no odor at all (i.e., carbon monoxide).

Appendix A provides illustrations and greater detail on the National Fire Protection Association 704M system, the Department of Transportation hazardous materials marking, labeling, and placarding guide, and the Department of Labor Material Safety Data Sheet (MSDS). It is important that any and all available clues are used in the process of substance identification, especially the most obvious, such as the information provided on a label or in shipping papers (shipping papers should remain at the incident scene for use by other response personnel). The aim of the health provider should be to make a product specific identification. Every effort should be taken to prevent exposure to chemicals. Identifying the hazardous material and obtaining information on its physical characteristics and toxicity are steps that are vital to the effective management of the hazardous materials incident. Since each compound has its own unique set of physical and toxicological properties, early and accurate identification of the hazardous material involved in the incident allows the emergency responders and emergency department staff to initiate appropriate scene management steps.

These recommendations must be incorporated in mitigation measures recommended for this development regarding construction hazards.

Additionally OSHA has identified in their hazardous waste site study a number of hazard issues. Even though these related to hazardous waste sites, they are relevant and applicable to construction sites. A discussion of these and mitigation measures must be discussed in the DEIR. We have listed some of these hazard areas below from their November 2002 report titled, "Summary Report: Hazardous Waste Site Safety Hazards Study".

Electrical

Electrical hazards were the most common safety hazards identified during the site visits. Many of the electrical hazards identified involved improper use of flexible cords (e.g. cords threaded through walls). Damaged cords and cords missing ground prongs were frequently observed. Other common electrical hazards reported by site representatives included unlabeled circuit breakers and missing doors on electrical panels. Site representatives described injuries and near misses to workers exposed to shock from energized parts as well as cords that were driven over. It was reported that at one site a worker suffered a shock injury ftom cutting into a live 480-volt line that was lying on the ground outside a building. An unqualified electrician had removed the line from the building.

Excavations

Excavation hazards were not often observed but were frequently discussed by site representatives. Several instances of striking underground installations during trenching activities at other sites were described. At one site, a local utility locator was not used to identify existing lines. Instead, old facility blueprints were relied upon. In another case, an operational cable bundle was struck and damaged because of an inadequate site walkover. A monument indicating the presence of the

cable bundle was present relatively near the excavation area, but wasn't noted until the post-incident investigation. In still another case, an electrical line was hit because a foreman and his technical manager did not communicate vital information.

The field team *did* observe hazards associated with soil stockpiles. During trenching operations, a competent person must watch the trench walls for cracks and fissures that may signify weaknesses. This practice is used less often for the sides of soil stockpiles. At one site, sizable cracks and fissures were observed in the side of a large soil stockpile. Heavy equipment was operating at the top of the pile. A road, used by both cars and pedestrians, was at the bottom of the banked soil. At this site, the field team promptly informed site representatives of the hazard.

Other common excavation hazards reported by site representatives included workers entering into unshored or improperly shored excavations and workers falling into unmarked trenches.

Walking Working Surfaces

Walking-working surface hazards were often identified during the site visits. The most common hazard mentioned was a lack of fall protection on elevated working surfaces such as scissor lifts. Two other examples of reported hazards included a worker who fell into a manhole with no cover and another worker who slipped and fell from a catwalk because the non-skid coating was worm off and there was inadequate fall protection.

General Environmental Controls

Hazards involving general environmental controls such as confined spaces, lockout/tagout operations, and sanitation were common. Of these, the most frequently observed hazard was a lack of written procedures for lockout/tagout and confined space. On several of the sites visited, there were no *specific* written lockout/tagout procedures and no list of who was authorized to implement lockout/tagout procedures. In addition, on one site visited, appropriate lockout devices were not immediately available. A sanitation hazard commonly reported was that water for onsite showers froze during winter months.

Material Handling Equipment and Motor Vehicles

Material handling equipment, including earth moving equipment, cranes, and motor vehicles, contributed to the safety hazards. Many unsafe conditions discussed by site personnel were caused by inappropriate use of heavy equipment that resulted in rollovers. On one site, an operator was observed using the front bucket of a backhoe to move an intermodal container.

Several site representatives reported that unsafe hoists resulting in crane rollovers were a common concern. Frequent causes of crane rollovers included miscalculating load weight (wet load), unstable surfaces, inexperienced operators, and high wind conditions.

Other common hazards discussed by site personnel included operating heavy equipment too close

to power lines, not barricading the swing radius, leaving running equipment unattended, not wearing seat belts, and stacking supplies improperly. At one site, an excavator was traversing under overhead lines and the boom pulled down an inactive communications line. At another site, a drill rig being moved with the mast up struck overhead power lines.

Site representatives reported that workers driving leased or rented vehicles were a source of many traffic accidents. Reasons include crossing dangerous intersections frequently and falling asleep at the wheel while driving to and from job sites.

Hand and Portable Powered Tools

Site representatives reported that site clearing activities (i.e., clearing trees) resulted in several accidents. Hard hats and face shields reduced the severity of the injuries. Several site representatives expressed the need for chain saw training and the importance of adequate PPE.

Welding and Cutting

Safety hazards involving welding and cutting activities were observed and reported at several of the sites. Some of the common hazards reported included oxygen cylinders and fuel cylinders stored together and hoses or cables not protected from traffic. Inappropriate repairs to cables, and welding screens insufficient to protect adjacent workers from the arc were actually observed. On one site, welding screens were used on one side of an arc welding operation, but did not shield the other side that was in direct view of on-coming traffic and adjacent residences. Arc welding produces ultraviolet light that can injure eyes.

Other Hazards

The emphasis of the site visits was on safety, not health hazards. Nevertheless, tick bites resulting in Lyme disease were reported as a serious problem on one site. Other biological hazards reported included insects, snakes, and vegetation. It was reported that on two sites bums from hot incinerator surfaces were common injuries.

One health deficiency is noted here because it occurred at all six sites. None of the sites maintained a written Exposure Control Plan for Bloodborne Pathogens as required by 29 CFR 1910.1030(c)(1). Certain sites also lacked a list of designated first aid responders. An Exposure Control Plan is required if personnel are required to provide first aid, and sites with permit-required confined spaces are required to have first aid providers. Since first aid has changed in the age of bloodborne pathogens, this may be a good topic for OSHA outreach.

Additional mitigation measures that must be implemented to minimize hazardous materials from impacting the area during construction include the prohibition of herbicides to remove vegetation in the development area. Removal of vegetation must be done with mechanized equipment or by hand crews. Herbicides will pollute the surrounding areas and pose an environmental hazard to plants and animals nearby that are not supposed to be impacted by vegetation removal. Also,

during construction, all hazardous material must be stored on concrete slabs or other impermeable surfaces to prevent spillage into the soil of these hazardous materials.

The EIR does not discuss use of potentially hazardous materials to the environment such as use of pesticides, fertilizers, and other yard care chemicals. These chemicals may be used in the project landscaping and also in the landscaping of these lots. Hazards such as these must be identified and mitigation measures must be recommended to minimize the impact of these. If there are no adequate mitigation measures that can be recommended, the EIR must make the finding that the project will have a significant impact regarding hazards and hazardous materials.

Health hazards to humans should be mentioned in the report due to wildlife displacement during construction. This may include possible attacks from coyotes and a number of rodents. Local area rodents are known to carry the bubonic plague. Some animals have rabies. A 2 year old Glendale resident was killed by a coyote in Glendale a few years ago.

The DEIR cannot understate the hazards associated with the construction of the development. These hazards must be properly identified, disclosed, and mitigation measures discussed. The construction activities may have a significant impact regarding hazards and hazardous materials. We need to know what they are and if they can be mitigated to a less than significant level. The EIR consultant must better identify Operational Impact hazards and identify additional ways to mitigate these hazards.

Section IV. M.2. HAZARDS AND HAZARDOUS MATERIALS- ELECTROMAGNETIC FIELD EMISSIONS

The studies cited in the DEIR do indicate that there are health hazards associated with being close to Electromagnetic Field Emissions. Also, estimates of EMF radiation are provided from studies. However, the DEIR is inadequate because no actual field measurements of electromagnetic radiation from the Edison Transmission Lines have been done on the project site to measure the intensity of the radiation at different distances from the Transmission lines.

The level of EMF radiation from the Edison Transmission lines can be quantified and it must be reported in the DEIR. Measurements should be taken several different times accounting for fluctuations in electricity that may occur during the day or during different seasons. The studies that are cited give average EMF radiation from Transmission Lines. The actual EMF radiation from the Edison Transmission Lines on site could be significantly higher or significantly lower than those studies. If actual measurements are not taken, it could understate a significant risk that cannot be mitigated unless the Edison Transmission Lines are removed from the site.

Also, the mitigation measures recommended in the DEIR are completely inadequate and do not mitigate the risk to certain residents below the threshold of not being significant. The studies referred to the in the DEIR have indicated a significant risk to residents living within 150' of electrical transmission lines. The mitigation measure recommended of merely informing residents purchasing lots within 150' feet of the transmission lines to be given a warning about the potential dangers of the

transmission lines is inadequate. The studies indicate that no residences including usable yard area that residents would utilize should be located 150' or less from the transmission lines.

The danger to residents whose area falls within that zone remains significant. **Therefore, we recommend as a mitigation measure that no residences or yard area where residents especially children be located within 150' of the Edison transmission lines located in the development.** This would mean the removal of 28 homes and lots from development in Development Area A. The DEIR must recommend this as a mitigation measure to reduce the threshold of significance to a level of less than significant after mitigation. Of course, actual measurements of the EMF radiation from the transmission lines must be done to determine if the zone of safety should be greater or less than 150' from the transmission lines.

If the EMF radiation from the Edison transmission lines on site is greater than the maximum thresholds recommended in the EMF health studies, then more lots should be removed from being developed. If the EMF radiation from the lines is less than the thresholds recommended in the EMF health studies then less than 28 lots in Development Area A would be impacted.

Also, the DEIR does not discuss the potential impact of construction workers who will be working near the Edison transmission lines in Development Area A. Some workers could possibly according the build-out timetable indicated in the DEIR work in the area up to 5 years. Mitigation measures should be recommended for the construction workers to avoid prolonged exposure to the EMF radiation generated by the Edison transmission lines.

There are studies that recommend safe household electrical practices. These should be incorporated into the development when homes are designed. We have included one such report below:

THE MITIGATION OF ELECTRICAL POLLUTION IN THE HOME

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ABSTRACT

The electrical pollution that is mitigated is the electric fields produced by the ubiquitous Marconi Transmitters present in today's high technology environment. Individuals should be able to determine if this mitigation in their home is beneficial to them.

THE MITIGATION OF ELECTRICAL POLLUTION IN THE HOME

The electrical pollution considered in this report is electrostatic fields that vary rapidly in a random or noiselike pattern. When Guglielmo Marconi transmitted wireless signals from Polphu, England to St. John's, New Foundland on December 12, 1901 he used a

spark transmitter that generated fields of this type. The antenna and the ground were connected to the spark gap. The wireless signals used today are much more orderly, since this is the basic way to enable multiple communication channels that share a common medium [1]. These modem signals have sinusoidal waveforms that are similar to those in the electrical distribution systems. However, there are millions of transmitters in the electrical power system that are the equivalent of Marconi's transmitter, and the power distribution wires are the antennas and grounds that couple these noiselike signals to humans. An inexpensive hand held AM radio receiver will detect these signals. Tune the receiver to the lowest frequency on the dial (about 500 kilohertz) which is below the lowest frequency broadcast station, turn up the volume, and you will hear a noise. As the receiver comes closer to a transmitter, the noise becomes louder. Try it near dimmer switches at various settings, personal computer displays and keyboards, fax machines, microwave ovens, electronic telephones, high efficiency fluorescent lamp bulbs, video tape recorders, and hand held hair dryers. The effects on humans depend on the path the currents produced by these fields takes through the humans, on the sensitivity of the individual, and on the amplitude, waveform, and duration of the fields. There is strong evidence that these currents may cause cancers, but this report is concerned with reducing the symptoms that humans can directly observe in themselves, such as poor short-term memory, chronic fatigue, depression, nausea, and rashes.

The Marconi Transmitters may be there because of the customer, or they may be there because of the utility. Some of the transmitters belonging to the customer are

- Hair dryers
- Dimmer switches
- Electronic transformers in low voltage halogen reading lamps
- Loose electrical connections
- High efficiency electronic systems

Some transmitters belonging to the utility are

- Switches controlling the power factor correction capacitors
- Tap switches on transformers for voltage regulation
- Deteriorated wires and connectors

There are transmitters which belong to other customers that are connected by the utility distribution system to your house. One such case is the strobe lights located on radio towers for aircraft warning purposes. The signals generated by these transmitters can travel considerable distances. The electric fields produced by these noise voltages between the power wires in a home can be reduced by lowering the impedance between the wires. Connecting a large capacitance between the wires has been effective in many cases in reducing the symptoms experienced by the occupants of the home. The capacitances used in these tests were about 200 microfarads across each 120 Volt circuit in the usual 240 Volt utility distribution system. In most cases these were installed at the main distribution in the home by a licensed electrician. Appendix A

describes how an individual can evaluate the effectiveness of this mitigation technique on their symptoms.

APPENDIX A

An individual can install a capacitor across the 120 Volt circuit by electrically connecting it to a plug that is inserted into a 120 Volt electrical outlet, which is the type used in homes for appliances such as lamps, television sets, toasters, etc. A good arrangements for individuals is to plug in ten to twenty 20 microfarad motor run AC capacitors into a number of different outlets. Suppliers of these capacitors can be found in the telephone yellow pages under electric motors and/or electrical supplies. The newer A.C. dry film capacitors in epoxy cases are better for this use by nonprofessionals than the older style oil filled capacitors in metal cases, but either will mitigate the pollution. The mitigation is somewhat more effective if the capacitors are plugged into outlets used for appliances that individuals are close to for extended periods of time, such as reading lamps, radios and television receivers, and kitchen appliances. Particular attention should be paid to safety.

- There should be no exposed electrical conductors.
- The components should be in a enclosure that prevents children from tampering with the device.
- Whenever a capacitor is disconnected from the outlet, it may have energy stored in it which will remain there for hours. A 27 kilohm 2 watt resistor permanently connected directly across the 20-microfarad capacitor will remove the stored energy within a few seconds without wasting appreciable power while the capacitor is connected to the outlet. Some sparking may occur at the plug when the capacitor is connected. This is normal.

The danger from EMF radiation is real. The studies referenced in the DEIR indicate the dangers. We would like to reference the conclusions of another study on the dangers of EMF radiation published by Dr. Neil Cherry, titled "Evidence that Electromagnetic Radiation is Genotoxic: The implications for the epidemiology of cancer and cardiac, neurological and reproductive effects", published June 2000. Dr. Cherry cited the results of a number of other studies on the effects of EMF radiation in his report.

Many multiple independent laboratories have shown the ELF and RF/MW radiation causes chromosome aberrations and DNA single- and double-strand damage. These include many dose response relationships and extremely low RF/MW exposure levels including cell phone radiation. Multiple studies also show significantly altered proto oncogenes expression and activity with ELF and RF/MW exposure. This also includes cell phone radiation. Several studies show impairment of the immune system health.

Since calcium ion efflux and melatonin reduction are established biological effects of EMR exposure from ELF to RF/MW, impair immune systems should be observed in EMR exposures. Multiple independent evidence is available for RF exposures, down to