



Shadow Hills Property Owners Association

Dedicated To Preserving Rural Community

December 16, 2003

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

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ENVIRONMENTAL
UNIT

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

Ms. Zaitzevsky,

However minor a concern, we would like to address the level of mitigation set forth in the Canyon Hills Draft Environmental Impact Report relative to the controversy over the potential effects of Electro-Magnetic Fields. There is such great controversy over whether there is or is not any significant effect on public health to those living in the vicinity of transmission towers emitting high levels of electro-magnetic waves that we do not wish to take a stand on one side or the other. However, we do feel that persons wishing to purchase homes in the Canyon Hills Project should be provided with information publicly available regarding suspected potential health risks. In the DEIR, EMF mitigation is defined as providing purchasers with information on where they themselves must go to obtain the information. Not everyone is computer-savvy enough to utilize the Internet to research this information and to obtain this information from public offices is not always the easiest. We feel that Canyon Hills should provide purchasers pamphlets with information about the controversy and do this not as a part of the purchase package, but as part of an information packet that all real estate agents make available to potential buyers.

36-1

A totally different subject: The DEIR did mention that excavation of cut slopes adjacent to existing neighborhoods may expose seepage associated with the drainfields of existing private sewage disposal systems. The DEIR claims that even if this were to happen they do not expect any negative effect to groundwater and that due to its distance from Development A fails to suggest potential impact. We beg to differ with this evaluation. Odors that would be associated with exposure of the drainfields would most certainly effect not only Development A, but the existing neighborhoods to the northeast. Cut slopes anywhere near possible sewage drainfields must be eliminated from the site plan

36-2

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The DEIR also is highly lacking in full consideration of all "Cumulative Impacts" within the area. As per CEQA Section 15355, all EIR's are required to consider the environmental impacts not only of the project itself, but also of impacts of ALL other projects in the vicinity. The DEIR has referenced only projects in already crowded urban and suburban areas totally different in character from the La Tuna Canyon with no reference to the more open, more rural neighborhoods of the canyon itself nor the mountains of the Verdugos as a whole that have been or may be notably impacted in the near future. The language of the CEQA regulations also implies that within a single project there can be cumulative environmental impacts. While addressing each individual issue and providing mitigation measures for individual factors, the DEIR never looks at the entire project, along with all it's environmental impacts, as a cumulative whole to be addressed. A true picture of the entire impact of the Canyon Hills Project due to losses of biological resources is never addressed as a whole, but segregated into eg "trees" with no connection of the tree's place in the whole biological picture in terms of their integration with animals, soils, aesthetics etc. Thus the DEIR lacks focus on the total environment which this development would impact, thereby missing the whole inherent purpose of an EIR.

36-3

The full impact of issues even within the Canyon Hills Project itself is often not undertaken using the excuse of "unable to evaluate due to inaccessible terrain." This illustrates a lack of true first-hand knowledge of the specific terrain on the part of the surveyors and the developers. The DEIR repeatedly cites other studies failing to integrate them into a comprehensive analysis of the total impacts of Canyon Hills.

36-4

Cumulative Impact Analyses should include current, past AND reasonably foreseeable future projects in the region of the proposed project. A current project, of far greater impact than eg the Taco Bell on Foothill Blvd, is the 34 unit development under construction in the western portion of the canyon itself. Cumulative impacts of projects of the recent past -- Oakmont I-IV which has markedly impacted the environmental habitat of the Verdugos. And the reasonably foreseeable future -- there are a lot of sale signs -- some for multi-acreage. What potential for future development and it's cumulative effect on the environment do these bring to the Verdugo's. The EIR should discuss the cumulative effects of all proposed or planned projects in the region. The EIR should identify all private holdings in the Verdugo Mountains with some reference to their potential as future development areas. It is necessary to have a complete cumulative impact analysis to ensure that a project is not approved that when viewed separately may not appear to have a markedly significant environmental impact, but when taken together with others have a very significant adverse effect on the environment.

36-5

The ever-shrinking habitat for Verdugo wildlife, the ever-increasing traffic congestion of La Tuna Canyon Rd and the I-210, the ever-increasing demands on already over-taxed services and the very worse for us in the northeast corner of the city, the precedent for ever-increasing higher density zone changes that will forever totally alter the rustic rural equestrian atmosphere of the canyon and it's ecosystem. I reference Section 12.27 of the LAMC related to the subject of Variances. A Variance shall not be used to grant a special privilege or to permit a use substantially inconsistent with the limitations upon other properties in the same zone and vicinity. It should be denied if the need for the variance were self-imposed. Canyon Hills as designed in the DEIR is totally inconsistent with the rural, equestrian lifestyle of the remainder of the canyon and is totally contrary to the zoning in the map of the Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Community Plan. The so-called need for variance is strictly financial for a land-speculative company.

36-6

