



Shadow Hills Property Owners Association

Dedicated To Preserving Rural Community

December 27, 2003

Maya Zaitzevsky, Project Coordinator
 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,

We would like to express a difference of opinion relative to the "clustering concept" as interpreted by Whitebird, Inc. as well as some missing and perhaps incorrect information presented in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") which, had it been made available, would have greatly helped the average resident follow Whitebird's explanations for their proposed zone change requests.

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A missing bit of information includes a map of the break-down of the proposed zone changes. The DEIR does provide maps of Land Use Designations both Current and Proposed (DEIR Figure IV-G-1 and Figure IV-G-6) and a Map of Current Zone Designations (DEIR Figure IV-G-4). It does not provide a map of Proposed Zone Designations throughout the Canyon Hills Project Site. The DEIR Figure IV-G-3 does provide a mapping of the prominent ridgelines of the entire San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (heretofore to be referred to as the "Scenic Preservation Plan"), however fails to provide an enlarged pull-out map, or map of any kind, illustrating how these ridgelines lie relative to the Canyon Hills Project Site and it's immediately adjacent lands only. There is some serious question as to a number of ridgeline endpoints that appear at the very point where these ridgelines meet the Canyon Hills Project Site border as seen in full-size maps available for examination at the Planning Department.

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A confusing or erroneous statement noted on page DEIR IV-G-16 makes reference to 237 acres **within** Development Areas. We are given to understand that there are 142 acres associated with Development A and 52 acres associated with Development B – this adds up to 194 total acres within Development Areas, not 237.

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I proceed now to our differing opinions as to the "clustering concept" as interpreted by Whitebird Inc. Canyon Hills is currently zoned A1 or A1-K in its entirety (DEIR Figure IV-G-4). Footnote 7 of the Community Plan emphasizes that it is only the total density that would otherwise be allowed over the entire ownership that may be clustered. If the existing zoning, the Hillside Ordinance restrictions and the Slope Density Formula were taken into consideration, the total number of units that Canyon Hills may be allotted would be 87 units, not 280. These 87 units could easily be clustered into RA zones which would make the entire Canyon Hills Project an equestrian-oriented project which would be in keeping with the Objectives of the Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Community Plan (heretofore to be referred to as the "Community Plan"). I reference Objective 1-8 of the Community Plan: "To promote and protect the existing rural, single-family equestrian oriented neighborhoods in RA zoned areas and "K" Districts. To caution against possible precedent-setting actions including zone variance, conditional use, or subdivision that might endanger the preservation of horsekeeping uses." The DEIR made reference to Footnote 7 of the Community Plan (DEIR IV-G-18) to point out that the proposed density of the Canyon Hills Site Plan does not exceed the maximum density permitted under the proposed Low Residential land use designation quoted in Footnote 7. While indeed Footnote 7 does state: "Subdivision in steep hillside areas shall be designed in such a way as to preserve the ridgelines and the steeper slopes as open space, limit the amount of grading required, and to protect the natural hillside views. The total density allowed over the entire ownership shall be clustered in the more naturally level portions of the ownership. Density clusters shall not **exceed** that permitted in the Low Density housing category for areas that are not in "K" Districts, and shall not **exceed** that permitted in the Very Low I category for areas that are within a "K" District." Indeed, the majority of Canyon Hills is not within a "K" District, however being located in a highly equestrian oriented canyon neighborhood, Canyon Hills should seriously consider clustering at equestrian-size lots. Footnote 7 does not lock you into the Low Density housing category, it merely restricts you from **exceeding** the zoning of Low Density housing. This would allow Canyon Hills to seriously consider clustering into lot sizes of an RA zone ie a minimum of 17,500 sq ft/lot equestrian lots, a very viable option with approximately 2.6 houses per net acre as opposed to the 9 quoted in the DEIR IV-G-18 when RA zoning was not taken into consideration. Canyon Hills would actually have two options given the 192 acres proposed for development. One would be to reduce the proposed development footprint for RA zoned lots or a second would be to increase the lot sizes for the 87 units to a higher zoning to fill the proposed footprint. Additionally, one should keep in mind that, as per the Community Plan, the area of Canyon Hills Development A is already foreseen to become zoned within the Very Low I density category (RE40 or RA). It is the intent of the Community Plan that the entitlements granted be of the zone designations set forth in the Plan unless accompanied by a concurrent Plan amendment.

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We obviously also differ somewhat in our opinion relative to the DEIR's interpretation of Land Use Compatibility. (IV-G-15 and IV-G-19, 1-1.2 & 1-3.1). We assume that the DEIR's reference to "existing homes adjacent to Development A" are references to the North and Northeast along eg Verdugo Crestline Area. The lots to the North and Northeast were subdivided many years ago and initially served as summer homes to the "city-folk" - they were never designed to be full-time residences and, as such, were never subdivided to

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serve as a full-time residence. It is the equestrian-oriented lots to the west in the canyon that should be taken into consideration when discussing neighborhood land use compatibility and Canyon Hills should be comparing it's Site Plans from the functional perspective of the western canyon neighborhood which has made every effort to retain equestrian lot size zoning.

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A handwritten signature in cursive script, appearing to read "Elektra G.M. Kruger".

Elektra G.M. Kruger, President
Shadow Hills Property Owners Association