



Shadow Hills Property Owners Association

Dedicated To Preserving Rural Community

December 6, 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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CITY OF LOS ANGELES
DEC 09 2003
ENVIRONMENTAL
UNIT

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

Ms. Zaitzevsky,

We have some serious reservations about the proposed Canyon Hills Project grading plans. Not meaning to be totally facetious, but what will they rename the project after they have cut up to 80 feet off the top of ridgelines (Canyon Hills Draft Environmental Impact Report IV-N-14) and used this to fill the project site canyons in order to maintain "balanced grading"?

15-1

4,600,000 or more cubic yards of grading effecting 240.2 acres of land (DEIR IV-N-38)! What happened to the Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Community Plan (heretofore to be referred to as the Community Plan) Objective 1-6 which states: "To limit residential density and minimize grading in hillside areas." We further reference Community Plan Policies:

1-6.2 "Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area."

15-2

1-6.3 "Require that grading be minimized to reduce the effects on environmentally sensitive areas."

15-3

We further reference Footnotes of the Community Plan:

Footnote #7 "~~Subdivision in steep hillside areas shall be designed in such a way as to~~ preserve the ridgelines (note: this is not limited to "prominent" 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." (Please take note of the phrase "naturally level" as opposed to "artificially created level".)

15-4

Footnote #19 "There shall be no grading of principal ridgelines (note: this again is not limited to "prominent ridgelines") within the Plan boundaries."

15-5

Footnote #4b "Densities shall not exceed that which would be permitted using the Slope

15-6

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Density Formula in LAMC Section 17.05C for lots which would otherwise require extensive grading, involve soil instability erosion problems or access problems as determined by the Deputy Advisory Agency".

15-6

Readdressing Footnote #7 above, I quote from the DEIR IV-N-14: "Project development would require cut and fill grading operations to prepare the project site for the proposed residential construction. Within Development Area A, site preparation would require the landform alteration of approximately 156.7 acres. This grading would include the lowering of a secondary ridgeline, in some places by as much as 80 feet. I now quote the DEIR from IV-N-25/26: From this perspective (Photo simulation Figure IV-N-16), substantial alteration of the skyline would be apparent. The natural irregularities of the skyline would be removed and be replaced by a manufactured plateau effect. While the main portion of Development Area A would not be seen from this location, the edge of the development would appear as a line of homes arranged along the skyline and descending along a minor ridge which is not a designated Prominent Ridgeline in the Draft Specific Plan." I further quote the DEIR from IV-N-26/27. "Substantial landform alterations would be visible from this perspective. (Photo simulation Figure IV-N-18). Irregularities on the existing skyline would be straightened out and replaced with horizontal lines." These quotes stand in total disregard of the Community Plan thereby hopefully negating the Canyon Hills Project as proposed. I now quote the DEIR from IV-N-25/26: From this perspective (Photo simulation Figure IV-N-16), substantial alteration of the skyline would be apparent.

15-7

The DEIR often refers to being in compliance with the San Gabriel/Verdugo Mountains Scenic Preservation Plan (heretofore to be referred to as the Scenic Preservation Plan). Although technically not required to do so as the Scenic Preservation Plan is not yet a Council approved City Ordinance, the proposed Canyon Hills Project snubs the very essence of one of the major elements of the Scenic Preservation Plan - that of preserving the skyline viewshed as seen from designated Scenic Corridors. While not being constructed atop a designated "prominent ridgeline", many homes are proposed to be built atop secondary ridgelines and deliberately modified terrain causing them to break the silhouette of the modified skylines as seen from Scenic Corridor Highways such as La Tuna Canyon Road (DEIR IV-N-24, DEIR photo simulation figure IV-N-13). I further quote the DEIR from IV-N-24/25: "..... the proposed grading in this area would lower the existing skyline in order to create building sites. While easily visible from La Tuna Canyon Road, the homes in this area are well set back from the highway and several appear to be tucked into their building sites, although others clearly break the silhouette of the graded ridgeline." (Photo simulation Figure IV-N-14). I further quote the DEIR from IV-N-25: "This view of the eastern portion of Development A illustrates how the secondary ridgeline would be lowered and contoured to create building sites. New homes located along the west face of the ridgeline would not be visible from approaching westbound vehicles. However, new homes along the ridgeline would break the silhouette of the ridgeline as seen from eastbound vehicles." (Photo simulation Figure IV-N-15). I further quote the DEIR from IV-N-26: As the Prominent Ridgeline descends toward the south, the new homes can be seen to break the silhouette of the ridgeline." (Photo simulation IV-N-17). UNACCEPTABLE!

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

