



Shadow Hills Property Owners Association

Dedicated To Preserving Rural Community

December 3, 2003

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

RECEIVED
 CITY OF LOS ANGELES
 DEC 08 2003
 ENVIRONMENTAL
 UNIT

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

Ms. Maya Zaitzevsky,

On behalf of the Shadow Hills Property Owners Association (SHPOA), I wish to express loud and clear that the proposed Canyon Hills Project fails to meet even the most basic guidelines of the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan (heretofore to be referred to as the "Community Plan") despite the frequent claims throughout the Canyon Hills Project Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") that it does so. According to the Community Plan, the Canyon Hills Development Area B is located in an area designated to remain at Minimum Density development ie zone designations of RE-40, A2 or A5. As per the Generalized Summary of Zoning Regulations of the City of Los Angeles RE-40, the smallest allowable Minimum Density Lot at 40,000 sq. ft./lot is approximately 0.91 acres/lot. According to the DEIR Summary Page I-4/I-5, Development B is projected to have 69 homes on 52 acres which would average out to approximately 0.67 acres/lot. The Community Plan places Canyon Hills Development A in an area foreseen to be developed as Low Residential I density ie Zone designations of RE-20 or RA. The proposed Canyon Hills Project Development Area A asks approval of 211 lots (DEIR I-4/I-5), most of which are requesting a zone variance to either RE-9-H or RE-11-H (DEIR IV.G-16). Neither an RE-9 (minimum 9,000 sq. ft./lot) nor an RE-11 (minimum 11,000 sq. ft./lot) zoned property is legally large enough for the keeping of equines as per the LAMC Sec. 12.07.01-A-3-b which states that the minimum size lot for the keeping of equines within the bounds of the City of Los Angeles must be 17,500 sq. ft./lot. The Canyon Hills DEIR erroneously claims equine-keeping capacity of it's proposed RE-11 lots (DEIR IV-G-4).

12-1

12-2

The above figures, by no means, honor the heart and goal of the Community Plan which offers guidelines to help future developments preserve the rural and equestrian characteristic of the residential neighborhoods of our corner of the City.

P.O. Box 345 • Sunland, California 91041-0345

I refer to just a few entries within the Community Plan:

- 1-1.2 Protect existing single residential neighborhoods from encroachment by higher density residential and other incompatible uses. 12-3
- 1-1.4 The City should promote neighborhood preservation in existing residential neighborhoods.
 Program: Residential land use categories, zone changes, subdivisions, parcel maps, variances, conditional uses, specific plans, community and neighborhood revitalization programs for residential projects shall be consistent with Plan recommendations. 12-4
- 1-3 To preserve and enhance the varied and distinct residential character and integrity of existing single and multifamily neighborhoods. 12-5
- 1-3.3 Preserve existing views of hillside and mountainous areas 12-6
- 1-6 To limit residential density and minimize grading in hillside areas
 (Esp. as per) 1-6.2 Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area
 Program: The Plan designates hillside areas in the Minimum and Very Low Densities of the General Plan land use designations and corresponding zones. 12-7
 Program: Continue implementation of the Citywide Hillside Ordinance and the 15% Slope Density Ordinance.
- 1-7.1 Place a high priority on the preservation of horsekeeping areas
 Program: A decision-maker involved in a discretionary review should make a finding that the zone variance, conditional use or subdivision does not endanger the preservation of horsekeeping uses within the Community. 12-8
- 1-8. 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. 12-9
- 1-8.1 Protect existing single-family equestrian-oriented neighborhoods and horsekeeping districts from encroachment by higher density residential and other incompatible uses.
 Program: New development within these areas should be designed to encourage and protect the equestrian-keeping lifestyle. 12-10
- 1-8.2 Horsekeeping areas should be developed at Minimum to Very Low Densities appropriate to such use.
 Program: The Plan Map identifies areas for lower residential densities. 12-11

1-8.3 New horsekeeping districts should be expanded where appropriate and feasible Program: The Plan Map identifies lower density residential areas appropriate for such districts.

12-12

La Tuna Canyon is one of the last vestiges of agricultural property in the City of Los Angeles with lots large enough for people to keep horses or other animals, or to grow a small orchard or beautiful expansive garden or simply to call a segment of a natural ecosystem their own. The existing neighborhood of western La Tuna Canyon is one of rural equestrian Minimum Density properties, often larger than the A5's minimum 5 acres, with a strong equine population. The properties are somewhat set back from La Tuna Canyon Road, but remain on the flatlands never encroaching on the hillsides thereby retaining the natural beauty and serenity of the canyon. The topography, flora and fauna of the hillsides remains undisturbed. This is the rustic rural equine-keeping character of the canyon today, this is the character that we ask Canyon Hills - that the Canyon Hills Project should - respect and make every attempt to preserve.

12-13

If the Canyon Hills Project is approved as designed, it would irrevocably alter the protective and restrictive nature of the Community Plan thereby literally paving a precedent-setting pattern for future developments and variances. If this is allowed to happen, we may just as well burn the Community Plan for that is all the value it would actually appear to possess.

12-14

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