



Shadow Hills Property Owners Association

Dedicated To Preserving Rural Community

December 28, 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
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Re: Canyon Hills Project
 ENV-2002-2481-EIR
 SCH. No. 2002091018
 October 2003

Ms. Zaitzevsky,

We differ somewhat in our opinions with the Canyon Hills Project developers in terms of their claims of consistency with the Objectives and Goals of the Sunland – Tujunga – Lake View Terrace – Shadow Hills – East La Tuna Canyon Community Plan (heretofore to be referred to as the “Community Plan”). We differ in opinion with many of the items listed in Table IV-G-4 of the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the “DEIR”), however most have been addressed in prior response letters submitted by the Shadow Hills Property Owners Association (heretofore to be referred to as “SHPOA”). We wish to address here only two, that of entry numbers 14-2.3 and 14-2.4. The Community Plan Policy statement of entry number 14-2.3 states: “Encourage the development of equestrian trails through residential areas appropriate for horsekeeping.” The Community Plan Policy entry number 14-2.4 includes among it’s statement: “New trails should be expanded where appropriate and feasible.” The Consistency Discussion of the DEIR responds to statement number 14- 2.3 stating that neither of the Canyon Hills Project Development Areas are appropriate for horsekeeping due to the steep topography and no part of the DEIR’s “Consistency Discussion” for entry number 14-2.4 addresses potential expansion of new trail systems. We appreciate that the developers may not understand the capabilities of the horse and rider or nature of the trails utilized in the Verdugo Mountain region, therefore I would strongly recommend that the developer meet with representatives of organizations holding a strong interest in the overall future development of the Canyon Hills Project. This would include such organizations as the Foothill Trails District Neighborhood Council, ETI Corral 20 and the Trails Committee of SHPOA.

129-1

A very different subject: I remind the Los Angeles Planning Department and the Canyon Hills Project Developer of the tragic incident in December 2003 in which extensive mudslides were responsible for a great deal of damage to property and worse to loss of life in

129-2

the Devore Waterman Canyon Area near San Bernardino. This resulted from heavy rains following recent wildfires which had engulfed the hillsides. La Tuna Canyon is highly susceptible to wind-driven wildfires and will be all the more so with the increased population of the Canyon Hills Projects' proposed 280 homes. A heavy rain following a canyon fire will surely saturate the bare soil resulting in liquefaction. Absolutely NO lot, home or roadway should be constructed near a known rock-fall area or known landslide area and no cut or fill should be greater than 10 feet.

129-2

A further very different subject: This in reference to Consistency Discussion Section 7A.2 page IV-G-25. I quote: "No grading or removal of native vegetation shall occur within any Prominent Ridgeline Protection Area(s), except as necessary to meet fire safety and brush clearance requirements, to develop recreational trails, or for landscaping associated with residential lots." We believe that no grading should be permitted more than 10 feet beyond a residential footpad. While there are structural restrictions relative to Prominent Ridgeline Protection Areas, lot lines may extend into these said areas. It is therefore very important to restrict grading and removal of native vegetation for residential landscaping which may disrupt the viewshed of the ridgeline.

129-3

I am confused by the wording of the Consistency Discussion Section 7A (DEIR IV-G-25). I quote: "As reflected in the site plan for the proposed project, none of the proposed homes would be located in whole or in part in a Prominent Ridgeline Protection Area and no proposed home located within five feet of a Prominent Ridgeline Protection Area would exceed 36 feet in height." If none of the homes for the proposed project are located even "in part" in the Prominent Ridgeline Protection Area, then how could there be an option for a home located within 5 feet of the Protection Area with a height limit of 36 feet. This would imply that these homes would be "in part" inside a Ridgeline Protection Area. If I am misreading this paragraph, I am sure I am not alone. I recommend that this paragraph of the DEIR be more clearly written.

129-4

A response to the Land Use Mitigation Measure noted on page IV-G-28. I quote: "The proposed project would not physically divide an established community or conflict with any applicable land use plan, policy regulation, habitat conservation plan or natural community conservation plan." The proposed site plan would most definitely conflict with "any applicable land use plan", that being the Community Plan which projects an eventual development to Very Low Residential I density for the Development A Area and Minimal density for the Development B Area. Thus, this Mitigation Measure, as stated, is in error.

129-5

Response to the DEIR's Project Growth calculations on page IV-H-5. While the calculations were based correctly on Community Plan housing density projections, no consideration was given to the lot size effect of hillside ordinance restrictions and the slope density formula. While indeed the unit allotment would be greater than the 87 we used in arguments in previous letters which were based on the current A1 zoning, the allotted units would still be much less than the 359 calculated here. Please repeat these calculations taking the hillside ordinance and slope density formula into consideration.

129-6

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

