



Shadow Hills Property Owners Association
Dedicated To Preserving Rural Community

December 5, 2003

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 ENVIRONMENTAL
 UNIT

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

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

Ms. Zaitzevsky,

The Community certainly understands that it is a property owners' right, including those of the Canyon Hills Project, to develop their lands. We ask only that they abide by the development guidelines provided in the Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon Community Plan (heretofore to be referred to as the "Community Plan") and similarly to abide by the restrictions laid out in the Los Angeles City Hillside Ordinance and Slope Density Formula (LAMC Sec. 17.05). The development guidelines set forth in the Community Plan assigns the Canyon Hills Development Area B as Minimum Density (A1, A2, or RE40) and the area of Canyon Hills Development A as Very Low Residential I (RE20 or RA). The Community Plan's Objective 1-8 States: "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." This very clearly states that zone changes, especially those that might alter the existing La Tuna Canyon equestrian character is markedly undesirable. If the Canyon Hills Development were to follow the existing zoning of it's entire 887 acres and abide by all Los Angeles City Hillside Ordinances and all Slope Density Formula restrictions, it would be allowed 87 units. To apply for a zone change permitting the construction of 280 units is totally out of line. This request is highly inconsistent with the Community Plan, although the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") frequently states, throughout the document, that it is in compliance with the Community Plan.

13-1

Given the topography of the Canyon Hills Project, the concept of "clustering" would be fully acceptable if it follows the intent of Footnote #7 and Footnote #4 of the Community Plan. While the clustering of lots in non-K districts might allow for RE-9 zoning, this should

13-2

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be considered in combination with Objective 1-8 and Footnote #4 of the Community Plan which states: "Densities shall not exceed that which would be permitted using the slope density formula in LAMC Section 17.05C for lots: (a) in areas of steep topography planned for Very Low I, Very Low II and Minimum density; and (b) which would otherwise require extensive grading, involve soil instability erosion problems or access problems, as determined by the Deputy Advisory Agency." One should keep in mind that, as per the Community Plan, the area of Canyon Hills Development A is designated to be Very Low Residential I density (RE40 or RA). It is the intent of the Community Plan that the entitlements granted should be of the zone designations set forth in the Plan unless accompanied by a concurrent PLAN amendment. Once again, compliance with the Community Plan is in question.

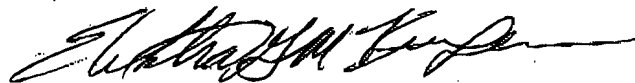
13-2

If zone variances were to be seriously considered, it might well be in the interest of Whitebird to consider a variance inclusive of a K-overlay. This would reduce, to some extent, Community resistance against the development as a whole. These words come not from an equestrian, but from one who has served as President of a Homeowners Association of an equestrian community.

13-3

With one exception, that of Alternative D, all so-called "alternatives" are essentially mere re-orientations of the same picture. This hardly constitutes "alternatives" as should be presented in a DEIR. How about considering a clustered 87-unit equestrian estate development - one that has the somewhat "tucked-in" appearance as seen in the DEIR map Figure IV-N-20 - rather than units placed atop a ridgeline (not necessarily "prominent") from which they might break the skyline as some do in Figures IV-N-13, IV-N-14 and IV-N-17 of the DEIR.

13-4



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