



**Shadow Hills Property Owners Association**

*Dedicated To Preserving Rural Community*

December 11, 2003

Maya Zaitzevsky, Project Coordinator  
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 17 2003

ENVIRONMENTAL  
UNIT

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

Ms. Zaitzevsky,

In my opinion, the Canyon Hills Project as proposed in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR") fails in it's obligation to meet the recreational needs of it's future residents.

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Currently, the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 population. However, this standard is not being met in the City of Los Angeles nor in the Project Site vicinity. Table IV-J-2 of the DEIR lists neighborhood and community parks within the vicinity of the Project and their distance from the Project area. I am familiar with the area and could, by no means, accept the mileage figures presented. As it turns out, a notation at the bottom of the page does indicate that the noted distances are linear. I am sorry, but no one flies from their residence to a park facility. The listed facilities are not readily accessible from the Project Site, most with major boulevard as well as true access distance issues. In addition to this, the listed parks have limited or no recreational opportunities such as baseball diamonds, soccer fields, basketball courts, etc. Facilities directed toward youth-oriented activities. Ideally, neighborhood parks are 5 to 10 acres in size having a service radius of approximately 1/2 mile and pedestrian accessible without having to cross a major arterial street, highway or freeway. Community parks are ideally 15 to 20 acres having a service radius of 2 miles and similarly are easily accessible to the area served. In subdivisions containing more than 50 dwelling units, developers may dedicate parkland in lieu of paying Quimby fees. It would be far more appropriate for Canyon Hills to dedicate a few acres for a high-density community park. According to the DEIR, the proposed project would increase the local residential population by approximately 831 persons, a figure I believe to be sorely understated. However, based on the preferred parkland per population ratio of 4 acres per 1,000 persons, the proposed project would require the use of 3.3 acres of new parkland. The added population associated

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with the proposed project would most assuredly result in the need for new or expanded park facilities thereby notably impacting these recreational facilities according to Appendix G of the CEQA Guidelines. Without onsite active recreational facilities, there would be a local deficiency of active recreational opportunities for children and youth at the project site. The DEIR claims: "There are no available flat areas on the project site that would permit the development of a park with a wide range of active recreational facilities for children and youth." (DEIR IV-J-26). It is very difficult for me to believe that in the entirety of an 887 acre property, there is not a single 3.3 acre piece of near level land that could be molded into a community park. I strongly recommend that Canyon Hills confer with the Los Angeles Department of Recreation and Parks to survey the site for potential community park locations. The planned tot lots, passive open space and picnic areas do NOT offset the need for high-density active recreational facilities with baseball diamonds, soccer fields, basketball courts, etc. The Canyon Hills DEIR claims that the 1.7 acres of tot lots, picnic areas, bbq's, etc., plus the proposed 3 acre equestrian park should satisfy the requirements of the Quimby Act, however if not accepted, Canyon Hills will also pay Quimby fees. Although payment of Quimby fees legally serves as meeting a developer's responsibility in satisfying the need for up-graded recreational facilities, this is just a cop-out for a development the size of Canyon Hills. I beg you, we are far more in need of a new park than we are of fee payments, especially when taking into account the cumulative impact of the two residential-related projects of single-family homes acknowledged by Canyon Hills as well as the 34-unit development under construction in the canyon that is not acknowledged by Canyon Hills.

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Currently, there is no proposed direct connection between Development A and Development B, so the equestrian trail system of the Verdugo's would be severely limited - especially considering that the Equestrian Park is to be on the south side of I-210 whereas the dedicated open space and the greater portion of the project site is on the north side of I-210. It would make far more sense to locate the Equestrian Park on or near Development A. Further, according to an NOP response letter submitted by a Mr. Matthew C. Thompson, the area of the Equestrian Park, as proposed in the DEIR, is highly subject to annual flooding and subsequent erosion. The proposed Equestrian Park is not located directly on La Tuna Canyon Road, but across a stream which would require the construction and maintenance of a bridge to access the facility. Mr. Thompson also states that the turn into and out of the proposed Park is directly across from one of the most dangerous curves on La Tuna Canyon Road. Mr. Thompson also makes note of the fact that access to equestrian trails above the canyon initially traverses private land owned by a Mr. Cliff Beck. To date, Mr. Beck has permitted passage to the occasional equestrian, however he would be fully within his right to deny this access if equestrian traffic increases substantially.

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Much further thought must be given to the recreational options provided by the Canyon Hills DEIR.

Elektra G.M. Kruger, President  
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