



Shadow Hills Property Owners Association
Dedicated To Preserving Rural Community

December 9, 2003

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 CITY OF LOS ANGELES

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

DEC 11 2003
 ENVIRONMENTAL
 UNIT

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

Ms. Zaitzevsky,

If approved as put forth in the Canyon Hills Draft Environmental Impact Report (heretofore to be referred to as the "DEIR"), the Canyon Hills Project is most assuredly a catastrophe in the making. The Project is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a canyon prone to wind-driven wildfires such as those common to our episodes of Southern California's Santa Ana Winds. This so much the more hazardous as the Project would also be out of compliance with the City of Los Angeles' Fire Code, Los Angeles Municipal Code, Section 57.09.07 which specifies maximum response distances for residential land uses. The maximum response distance specified for an engine company is 1.5 miles. The maximum response distance for a Truck Company is 2.0 miles. A "Task Force Station" consists of a Truck Company, an Engine Company and at least 10 personnel. A Truck Company consists of 2 vehicles, one a truck with a 100 ft aerial ladder apparatus and one an engine which is a vehicle with a pump. An Engine Company has only one vehicle, an engine with a pump. The nearest station to the Project would be Station 74 on Foothill Blvd., a Task Force Station with a truck and engine company as well as a paramedic ambulance and Emergency Medical Treatment rescue ambulance, 2.8 miles away. The Station has 12 personnel. There are two other Stations that would serve the Project. First is Station 24 located 3.4 miles northwest of the Project on Wentworth St. in Sunland which consists of a single engine company and has a personnel count of 4. The third Station that would be available to the Project would be Station No. 77 located approximately 4.25 miles southwest of the Project on Glenoaks Blvd. in Sun Valley. This station has one engine company, a paramedic ambulance and a personnel count of 4. These distances are based on the route from the respective Stations to the intersection of La Tuna Canyon Road and the I-210, the proposed site of the single ingress/egress intended to serve the 211 homes of Development A and does not take into account the additional distance along the access road internal to the Project prior to encountering even the nearest home. In the event of a

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wildfire, can you picture vehicles from 211 homes attempting to leave from the same single ingress/egress that emergency vehicles are attempting to use to enter? The secondary emergency access suggested by the DEIR (DEIR IV-J-7/8) along either Verdugo Crestline Drive or Inspiration way is ludicrous. I have recently driven these roads in my small half ton pick-up and found it terribly difficult to negotiate the narrow roads with their frequent hair-pin turns. There is no way that a fire truck with it's 100 ft ladder apparatus could circumvent these roads. Homes often border directly along the roadway, so I find it difficult to believe that these roads could be widened enough to meet Fire Code standards – and even if they could, the emergency vehicles still would never be able to negotiate those turns. To picture this secondary access to be used merely as an exit route for residents is no less ludicrous. In the panic of trying to leave a dangerous situation, traveling these narrow curving roads would be a slow process resulting in a queue of cars potentially caught in the line of fire within the canyon. Furthermore, to follow the route toward Foothill Blvd would be next to impossible for anyone not familiar with the path. Without going into the details, please trust me that one might very likely simply drive a circle right back into the canyon one is trying to exit.

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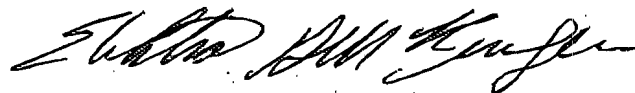
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The DEIR claims an expected 831 resident increase to the area, a number I find sorely understated. However, even at 831, the new resident population would greatly increase the potential for wildfire starts in the area and also the need for paramedic services – an area in excess of Code specified distances from the nearest Station – at a time when every second may be crucial.

I now quote from the DEIR IV-J-7: "Since the response distance between the Project Site and the primary response fire station is not within Fire Code specifications pertaining to engine and truck companies (1.5 miles and 2.0 miles, respectively, for residential development), impacts with respect to distance criteria are considered to be potentially significant. However, LAMC Section 57.09.07 provides that, where a response distance exceeds the maximum response distance set forth in the Fire Code, all project structures shall be constructed with automatic fire sprinkler systems in order to compensate for the additional response distance. That requirement has been included as Mitigation Measure J.1-7 below." Note: The DEIR states this Mitigation Measure number in error here – the referred-to Mitigation Measure is Mitigation Measure J.1-1. (DEIR IV-J-9). I further quote from the DEIR (DEIR IV-J-9): "With the implementation of Mitigation Measure J.1-1, the proposed project would not have a significant impact on fire protection services." This, too, is quite ludicrous. Fire sprinkler systems are intended to control fires starting internal to a structure. How is an automatic sprinkler system going to control a wildfire that burns down a structure leaving the automatic sprinkler system to stand naked. This hardly serves as a primary Mitigation Measure as implied by the DEIR. The majority of the remaining listed "Mitigation Measures" are already specifications of the Fire Code and should not be considered Mitigation Measures unique to the Canyon Hills Project.



Elektra G.M. Kruger, President
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