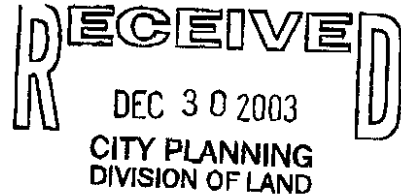


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December 21, 2003  
Maya Zaitzevsky, project coordinator  
City of Los Angeles Department of City Planning  
200 N. Spring Street, room 763  
Los Angeles, CA. 90012

Dear Ms. Zaitzevsky:

I am writing this letter in response to the Canyon Hills Project Draft EIR Case # ENV-2002-2481-EIR Reference# SCH 2002091018. I have lived in Tujunga my entire life and I enjoy its rural characteristics greatly. There are few areas left in the Los Angeles area with Tujunga's unique rural character and open space. Having lived in Tujunga my entire life I have seen a lot of growth and changes, and while both can be good, I feel it is extremely important that it is done with very careful planning.

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After reading section IV. Environmental Impact Analysis J. Public Service and I. Fire Protection I see many inaccuracies as well as complete omissions of very crucial information. I am a Municipal City paid Professional Firefighter-Paramedic and feel more than qualified to comment in these areas.

To begin with on page IV.J-3 and IV.J-4 under response distance and access

The DEIR points out the fact that the project site is not within the Maximum allowable response distance per the LAFD FIRE CODE being that the project site is 2.8 miles from the closest Fire station. The project site is almost twice the Maximum allowable distance for the Closest Engine Company and 1/3 greater than the Maximum allowable distance for the Closest Truck Company. If there should ever happen to be a significant structure fire or other incident the closest Fire station #74 would quickly deploy its entire resources (1 engine company, 1 Truck company with a pumper, and 1 rescue ambulance). This leaves the rest of the city to be covered by Fire station #24 which is approximately 3.4 miles from Tujunga (well over twice the maximum allowable distance) Fire station #24 provides a single Engine Company and provides no paramedic service. The Third closest station #77 is approximately 4.25 miles from Tujunga (again well over two times the Maximum allowable response distance) Fire station #77 provides Paramedic service, but does not provide ambulance transport of patients. Another concern and factor regarding response times and distances is the possibility and probability that the second closest Fire station #24 and third closest Fire station #77 are either on another call in their own districts or were already dispatched to the first mentioned incident response with fire station #74. During this type of incident the rest of the city is unprotected and at best, eligible Fire Protection will be coming from as far away as Pacoima (Fire Station 98) Van Nuys (Fire Station 89) or North Hollywood (Fire Station 60). These Fire units will have incredibly long response times and distances, (again given only if they are available to respond and not already on a call in their own districts). The DEIR acknowledges the fact that the Canyon Hills Project will increase the likelihood and threat potential of fires in this already "Very High Fire Hazard Zone" during temporary construction operations as well as the long term by introducing the new population to the area (page IV.J-5 and J-6). The DEIR mentions the developers intended mitigation measures for

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complying with the LAFD's Fire Code for an area of residential development outside of the Maximum response distance. The developer intends to comply with LAMC Section 57.09.07 by providing automatic fire sprinkler systems to the project structures. This measure will in no way reduce response times or reduce the threat of a wild land fire. In speaking with several members of the LAFD's Fire Suppression crew at Fire Station #74, I found that the members there by and large feel that Fire Protection and services in this area are already spread out thin and Fire Station Personnel feel extremely challenged to accommodate the citizens of Tujunga and surrounding areas. The DEIR also mentions there are currently no plans to increase or augment area Fire Stations or personnel numbers (page IV.J-1) Existing mutual aid agreements and back up support from the County of Los Angeles Fire Department is only during Wild land fires and **not structure fires or Emergency medical services.**

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The mitigating solutions provided in the DEIR by the developers and their team mentions efforts to aid against the threat of structure and wild land fires.

I find that this current DEIR is severely flawed in its attempt to down play the serious nature of a structure fire and or a wild land fire. The DEIR states it feels the mitigation measure's it provides for will adequately reduce the recongnized potential and significant impacts the Canyon Hills Project will have on Fire protection Services, furthermore the DEIR then concludes these threats to be less than significant (page IV.J-12). This statement is a gross misunderstanding of the intensive use of equipment, resources and manpower a single structure fire demands. This type of incident is always a significant threat and impact to fire protective services even under the best staffing, mitigation efforts and conditions. The same is true for a Wild land Incident. I feel it safe to say we have all seen the devastation a wild land fire can bring regardless of the best-intended mitigating efforts and Fire Equipment available.

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Taking all of the above mentioned into consideration, the single most significant under estimation of the DEIR as it relates to Public Services and Fire Protection, is the complete omission and lack of mention regarding Emergency Medical Service (EMS) provisions. Aside from the statement the DEIR does make in that the LAFD is the primary provider of Paramedic and ambulance service to 911 patients in the area. There is no mention of what impact this project (Canyon Hills) will have on the already challenged Emergency Medical Services for this area. As it stands currently the only ambulance serving Tujunga and the surrounding area is Rescue Ambulance #74 there is not another ambulance capable of patient transport anywhere near this area once Rescue #74 is in use and on a response. Please note that fire apparatus such as an Engine Company or Truck Company cannot transport a patient at any time. There are only two hospitals in the general Tujunga area that accept patients from LAFD Paramedics, the first being Pacifica Hospital in Sun Valley approximately 8 miles from Tujunga and Verdugo Hills Hospital in La Canada approximately 5 miles from Tujunga( Verdugo Hills Hospital will frequently make itself closed to LAFD patients during times of heavy Emergency Room use such as FLU season, I was told it is not uncommon for Verdugo Hills Hospital to be closed to LAFD patient traffic). A third Hospital available for LAFD patients would be Providence Holly Cross located in Granada hills approximately 15 miles from Tujunga, (Holly Cross is the nearest Trauma Hospital and generally would only accept patients from the Tujunga area that meet the Trauma center criteria).

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Understanding these factors it is quite easy to see how with just one patient being transported to the hospital by Rescue Ambulance #74 the entire remaining Tujunga area is without patient transport capabilities for extended periods of time. The typical turn around time for a Paramedic Ambulance in the LAFD is one hour. It is very easy to see that the LAFD is Already extremely

challenged to provide patient care in this area without adding the estimated 831 residents the Canyon Hills project would add, (this number of residents is highly subjective and most likely inaccurately low).

According to the American Heart Association which has developed and published the ideal guidelines and criteria for rapid EMS response systems, as well as Advanced Cardiac Life Support criteria and guidelines, that of which the LAFD Paramedics are trained in and follow as their Standard field Treatment protocols. The American Heart Association states that a response time **greater than four minutes** for a person suffering a heart attack or other life-threatening emergency is too long! (pp. 17-7 Advanced Cardiac Life Support-American Heart Association 1997) The ideal goal is to have advanced life saving personnel(Paramedics) on scene within four minutes.

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Currently the LAFD finds itself severely challenged to meet this goal. The second part of this is that the American Heart Association also calls for rapid transport of critical patients to the receiving hospitals. Patients such as those having heart attacks, strokes or that are critically injured require rapid Ambulance transport. It is simply not enough to provide Fire Department members to the scene via an Engine or Truck Company with out the ability to transport a patient within an acceptable period of time. The DEIR as it relates to the Canyon Hill Project has already acknowledged the fact that existing Fire Protection Service in this Area is not able to provide emergency response within acceptable LAFD time frames. **This undoubtedly puts the citizens of this community at great risk!** No amount of fire sprinklers or fire resistant shrubbery will change these inadequate response times and patient transport abilities.

I am asking that further research be conducted regarding the LAFD's EMS services in the Tujunga and surrounding areas and the Impact the Canyon Hills Project will further negatively impact **Life Safety Issues.**

In closing I am not against change and or growth in this area, however I am asking the Los Angeles City Planning Department and The Los Angeles City Council members to reject this DEIR as it is currently written as well as asking that the Developers and the Canyon Hills Project be limited from building the proposed 280 homes and be held to strict compliance of the current existing Los Angeles City Building code requirements of the 87 homes this zoned area would provide.

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Sincerely,



Kyle Springer