

CANYON AREA PRESERVATION

Information about preserving our canyons, hillsides, and the foothills.

December 22, 2003

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City of Los Angeles Department of City Planning
200 N. Spring Street #763
Los Angeles, CA 90012

RE: Whitebird Canyon Hills Draft Environmental Impact Report
ENV-2002-2481-EIR

The LA City Planning Department has issued a Draft Environmental Impact Report (DEIR) for a proposed development of 280 homes within the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan (the Community Plan) area known as Canyon Hills.

In the DEIR Summary under "Land Use - Consistency with Land Use Plans, Policies and Regulations" on Page I-33, it declares "The proposed project would be consistent with the applicable policies in the Sunland-Tujunga Community Plan" and "the proposed project's land use impacts would be less than significant and therefore no mitigation measures are recommended".

These declarations are FALSE and NOT CONSISTENT, and the proposed project should be rejected on Land Use issues alone, though there are numerous other reasons to reject this proposal or at the least to require the DEIR to be rejected, modified, and resubmitted.

As part of their application, the developer is required to secure the following entitlements from the City Council before receiving the necessary permits to build the project. By definition, the fact that they are requesting these amendments and variances is proof that their initial assertions about consistency are false:

- o Major Plan Review
- o General Plan Amendment to change the land use designation in the Sunland-Tujunga Community Plan on a portion of the project site from Minimum Residential, Very Low I Residential, Very Low II Residential and Open Space to Minimum residential and Low Residential.
- o Zone changes to change the zoning designations for portions of the project site from A1 (agricultural) and RE11 (Residential Estate) to RE9-H (Residential Estate Hillside) and RE11-H (Residential Estate Hillside).

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CH DEIR Crouch Land Use.doc Page 1 of 19f

RHONDA HERBEL

12-29-03 CANYON HILLS DEIR COMMENTS

LAND USE ANALYSIS
EXHIBIT

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- Oak Tree Removal/Relocation Permit
- And many other requests such as variances from the Hillside Housing Density Ordinance and the 15% Slope Plan Amendment.

Transfer of Density

One of the key elements proposed by Whitebird is to transfer the density of development proposed for the entire 887 acre project area to a 194 acre section of the property. To enable this, they are requesting that the zoning for a 194 acre area be changed to RE-9H (9,000 square foot lots) and RE-11H (11,000 square foot lots) to allow them to build their 280 homes in an area that is currently zoned primarily as A1-1 Minimum – two structures per five acres with a minimum lot width of 300 feet. As a point of fact, the total number of homes allowed under current zoning and land use regulations for the entire 887 acres is (allegedly) 87 houses – approximately 1 house every ten acres.

I decided to review the Community Plan to check the actual wording when it comes to the concept of clustering or “transfer of density”. The results of my study are presented here with references to the specific sections of the Plan. The Community Plan along with maps and footnotes is available on-line for anyone to check these facts (for the Community Plan <http://www.ci.la.ca.us/pln/complan/pdf/sldcptxt.pdf> , for the map and footnotes <http://www.ci.la.ca.us/pln/complan/valley/sldplan.htm>).

The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (the Scenic Plan) will have additional information regarding this issue. Since the Scenic Plan was only approved on December 19 2003, Canyon Area Preservation will write a separate letter commenting on the Canyon Hills DEIR's conformance with the Scenic Plan. The Applicant has included many references to the Scenic Plan in the DEIR and these references are entirely inappropriate considering that the Scenic Plan continued to undergo major revisions past the time of submission to the City Council of the DEIR, though we appreciate their awareness of how this will ultimately have a major effect on this project and how it may require the Applicant to revise the DEIR. Still, the provisions of the Community Plan will prevail in all areas outside of the Prominent Ridgeline Protection Areas outlined in the Scenic Plan, as per the City Council's endorsement of the Scenic Plan in September 2002 where Councilmember Wendy Greuel of CD 2 read aloud the sentence declaring this fact.

Here are the statements in the Community Plan I was able to find that mention the concept of clustering, although the term “transfer of density” is not specifically used:

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Community Plan

- **Chapter One, Community Issues and Opportunities, Page I-3 "Opportunities"** – Un-developed or underdeveloped land allowing opportunities for clustered development.
- **Chapter Four, Coordination Opportunities For Public Agencies, Page IV-3 "Housing"** – Item 6: Allow for the assembly and trade of public land in order to encourage the construction of housing in appropriate locations within the Plan area.
- **Map Footnotes, Page F-1 Footnote 7.**- Subdivision in steep hillside areas shall be designed in such a way as to preserve the ridgelines and the steeper slopes as open space, limit the amount of grading required, and to protect the natural hillside views. The total density allowed over the entire ownership shall be clustered in the more naturally level portions of the ownership. Density in the clusters shall not exceed that permitted in the Low density housing category for areas that are not in "K" districts, and shall not exceed that permitted in the Very Low I category for areas that are within a "K" district.

If one examines these passages for specific legal wording or intent, one sees that the Community Plan is primarily telling future developers and regulatory agencies that they shall "cluster" development in "appropriate locations" in the "more naturally level portions of the ownership".

But what does this say about moving a homesite that is affected by a hillside from one lot to another and therefore creating a higher density than the zoning allows for the second lot? Only Footnote 7 in the third sentence says "Density in the clusters shall not exceed that permitted in the Low density housing category for areas that are not in "K" districts, ...". The previous sentence in Footnote 7 says that clustering should be done in the more naturally level parts of the land, but that simply means to get the homes off the hillsides. The phrase "...Shall not exceed" can be taken literally - it is not a requirement that Low Density zoning be used for every parcel a developer wants to build.

If these are the only three statements that mention this concept in the entire 50-page Community Plan document, what else is written about land use that might have a modifying effect. It turns out there is plenty.

Before going into that section of this report, I would like to highlight one particular passage that specifically mentions the land owned by Whitebird intended for the Canyon Hills development. This is one of the few places in the entire document where a specific piece of land is singled out for a comment:

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Community Plan, Footnotes, Page F-2, Footnote 15 -

“Development located between the Sunland-Tujunga-Lake View Terrace-Shadow Hills-La Tuna Canyon Community Plan boundary line on the south, the DWP right-of-way on the northeast, and Sunland Boulevard on the northwest having a natural average grade of 2:1 or steeper shall be limited to Minimum Density.”

Note that Footnote 15 states “...**Shall be limited to Minimum Density**”. It doesn't say “may” or “if a developer wants to”. Since both Footnote 7 and 15 coexist in the Community Plan, one must conclude that the more restrictive footnote should prevail when it specifically identifies a boundary. Footnote 15 exists because this area is particularly steep terrain requiring protection from the kinds of grading that would be necessary to make high density development possible here. Minimum Density standards should be enforced for this land. Canyon Hills is **NOT CONSISTENT** with the concept of Transfer of Density.

Minimize Grading In Hillside Areas

Another key aspect of the Community Plan and several long-standing City ordinances has to do with grading of hillsides. This has been a contentious issue in Council District 2, ever since Councilman Howard Finn first proposed the concept of the Scenic Preservation Specific Plan over 20 years ago and continued with the efforts of Joel Wachs, who shepherded the Scenic Plan through the planning process until his resignation in 2002, at which time Wendy Greuel inherited the initiative.

The grading of hillsides to accommodate development on slopes has been discouraged for many years in this Council district by ordinance. This is spelled out in the Community Plan in several places, most prominently in Chapter III:

Chapter III, Goal 1 Objective 1-6, Page III-5 - To limit residential density and minimize grading in hillside areas. **Policy: 1-6.2:** Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area. **Program:** The Plan designates hillside areas in the Minimum and Very Low Densities of the General Plan and use designations and corresponding zones. Continue implementation of the Citywide Hillside Ordinance and the 15% Slope Density Ordinance. **Policy 1-6.3:** Require that grading be minimized to reduce the effects on environmentally sensitive areas.

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The purpose of this Goal is to eliminate the need for wholesale grading of hillside areas by enforcing Minimum density zoning so as to preserve the unique character of the land and the community. **The Canyon Hills project fails to minimize grading.**

According to the DEIR (Project Description Page III-6), 240.23 acres would be affected by the grading of approximately 5.52 million cubic yards of earth (4.6-million cubic yards + 20% remedial grading). However, this figure does not include an additional 23 acres of the project site that is part of their "natural open space" designation and would be subject to remedial grading (Project Description Page III-8 Open Space Paragraph 2); nor does it apply to an additional 73 acres of "modified open space" in the fuel modification area (Project Description Page III-8 Paragraph 3). These graded areas now total **336.23** acres, or nearly **38%** of the total Site.

There are a lot of conflicting statements in the DEIR regarding exactly how much total grading will be done. In the Hydrology section, it states that **439** total acres will be affected by development - 360 acres in Area A north of the 210 Freeway and 79 acres in Area B south of the 210 Freeway (Hydrology Page IV.C-5). In the Project Description I noted above they initially identify **240.23** acres that would be affected by grading. In the Land Use section (Page IV.G-15) they talk about 693 acres of the 887 acre project as being preserved as open space, leaving **194** acres of development - a misleading figure when it comes to grading impact on the land. In the initial Summary section (Page I-15&16), they say 304.77 acres would be "disturbed" (211 acres affected by grading and not revegetated, ..., An additional 23.32 acres would be subject to remedial grading impacts, but would be revegetated..."), so by my count **234.32** acres would be graded according to this section. Diagram IV.D-4 "Zones of Temporary and Permanent Impact With The Project" shows 33.32 acres of temporary impact and 304.77 acres of permanent impact totaling **338.09** acres.

I cannot find one single sentence in the DEIR that definitively states how much actual grading will take place in total on this project. By "total" I mean everything, even in the "open space" they will be dedicating to a public agency. At the very least, I can assure you that the 194 acre figure that is constantly used to describe the size of this project is **MISLEADING**.

If Diagram IV.D-4 is used, 338.09 acres (38%) of the project Site will be graded. This figure includes many hillsides that extend way beyond the "more naturally level portions of the ownership" as envisioned even in Footnote 7 of the Community Plan. In order to accommodate the proposed number of houses, roads, and utility easements hillsides will have to be leveled and "shaved" down by as much as 80-100 feet, something that is prohibited by the existing ordinances and the spirit and word of the Community Plan. The hillsides are a feature of the

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area to be preserved, not destroyed – regardless of whether they are considered “Prominent” or not.

Footnote 4 of the Community Plan 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.”

This Footnote basically says that density should be reduced if the alternative is to extensively grade the hillsides. There can be no doubt that the Canyon Hills project involves extensive grading just to create level lots for 280 homes. Canyon Hills is **NOT CONSISTENT** with the goals of the Community Plan regarding grading.

Land Use Compatibility

The area to the north and northeast of the proposed Canyon Hills project has been developed for many years (built in the 1920's to the 1980's). The area has many high density parcels, as well as sections of unpaved roads with houses spaced far apart including lots ranging from a half to several acres.

The area to the south of Canyon Hills generally includes the equestrian estates of La Tuna Canyon, but there are also small pockets of higher density housing on side streets. La Tuna Canyon is all about horsekeeping and riding in the nearby hills, despite the constant threats to build at higher densities in the community. Even in the higher density clusters in La Tuna Canyon, horse trails abound near every house.

The fact is, though, that the Community Plan – developed with public input over the past 20 years since most of the initial development occurred – recognizes that the region containing Canyon Hills should be kept compatible to horsekeeping activities when new developments are proposed.

Community Plan Chapter III, Land Use Policies and Programs, Page III-2 – The community includes large areas of open space and natural landforms. It is one of the more rural areas of the City and supports a substantial equestrian-oriented population. It is a policy of the Plan to protect these areas from encroachment by incompatible uses.

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Chapter III, Goal 1 Objective 1-7, Page III-5 – To insure compatibility between equestrian and other uses found in the RA Zone. **Policy 1-7.1:** Place a high priority on the preservation of horsekeeping areas.

Chapter III, Goal 1 Objective 1-8, Page III-6 – 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. **Policy 1-8.1:** Protect existing single-family equestrian oriented neighborhoods and horsekeeping districts from encroachment by higher density residential and other incompatible uses. **Policy 1-8.2:** Horsekeeping areas should be developed at Minimum to Very Low densities appropriate to such use. **Policy 1-8.3:** new horsekeeping districts should be expanded where appropriate and feasible.

Chapter III, Goal 14 Objective 14-2, Page III-25 – To provide for the maintenance, linkage, and development of equestrian trails for recreational use. **Policy 14-2.3:** Encourage the development of equestrian trails through residential areas appropriate for horsekeeping. **Program:** All future subdivisions should provide access to the equestrian trail system in these areas. **Policy 14-2.4:** Existing trails should be protected from encroachment by incompatible land uses. New trails should be expanded where appropriate and feasible.

Taken together, these Goals, Policies, and Programs of the Community Plan are a strong statement that any new project in the area should be compatible with the horsekeeping uses of the area that now predominate. Canyon Hills will actually have more impact on the La Tuna Canyon community than it will on the neighborhoods to the north and northeast due to the planned isolation from the northerly homes (at least as far as traffic, if not noise, visual impact, and light pollution are concerned!). Not only is Area B located directly adjacent to La Tuna Canyon homes, but Area A’s main road uses La Tuna Canyon Road as its access point so it is more likely that residents in Area A will come in contact with people in La Tuna Canyon.

The equestrian community is rightfully concerned that this part of the City of Los Angeles be maintained in the unique character that exists because once the open spaces are gone there are no other places in the entire City to ride or keep horses. It’s worth repeating the policies of the Community Plan Chapter III Goal 1-8 above: **Policy 1-8.1: Protect existing single-family equestrian oriented neighborhoods and horsekeeping districts from encroachment by higher**

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density residential and other incompatible uses. Policy 1-8.2: Horsekeeping areas should be developed at Minimum to Very Low densities appropriate to such use.

Canyon Hills represents an encroachment on the region by higher density development that will serve as a precedent to other high density development. This project would be the death knell for horsekeeping in CD 2. The 3-acre equestrian park proposed for Canyon Hills would not mitigate the encroachment by incompatible land uses. In fact, it is misleading to say, as Whitebird does in the DEIR (Land Use, Page IV.G-16), that "The proposed extension of permanent open space and equestrian and hiking uses are compatible with the existing open space, equestrian and recreational uses in the project vicinity". Their equestrian park is inadequate regarding parking and public access and makes assumptions that it will be run by some public agency for the good of the community. It is more appropriate to recognize that the hill that will be graded for Area B will completely block any horse trails or outside access, and the developer does not plan for any horse trails in the entire Area A, even though there are now several trails that run through the property. In other words, this development "encroaches" upon the existing equestrian oriented neighborhoods in La Tuna Canyon and prevents – for all time – any future trails that residents may want inside the development due to high density clustering.

Whitebird could have designed its Canyon Hills project to accommodate horse trails through the development areas, and planned for lots large enough to accommodate horsekeeping facilities if residents wanted them at some point in the future, but these ideas are not contained in any of the alternative development proposals. Though not strictly required by the Community Plan, Policy 14-2.3 cited above "encourages the development of equestrian trails through residential areas appropriate for horsekeeping", and urges a "program that all future subdivisions should provide access to the equestrian trail system in these areas". **Canyon Hills is NOT CONSISTENT** with the Community Plan in regard to land use compatibility with adjacent neighborhoods.

If compatibility with adjacent neighborhoods is to be a hallmark of the Canyon Hills project, how can a high density project ever be compatible with the most immediate feature of the area, the Santa Monica Mountains Conservancy open space that is directly south and southeasterly (even east) of Whitebird's property? This area is described in the DEIR (Land Use, Page IV.G-2): "A large portion of the land immediately south of the project site is permanent open space, conserved as part of the Santa Monica Mountains Conservancy's La Tuna Canyon Park." This is complete open space, with trails for hikers, bike riders, and horses. This land is on Verdugo Mountain itself, and the Whitebird property is part of the foothills that extend down to Hansen Dam Park. Whitebird's Area A and B will effectively cut off the 693 acres of open space proposed by Whitebird from Verdugo Mountain and prevent equestrian access between

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the mountain and their open space. This would be an encroachment by an incompatible project, something discouraged in the Community Plan.

Precedent

The most recent project in the immediate area that sought major variances from the Community Plan and zoning was Duke Development (CF 00-2016). Their project was finally approved in December 2001 – **after the project was modified to comply with existing zoning and ordinances, and they were forced to take homes OFF the ridges and hillsides!**

Duke's proposal in 1997 asked for permission to amend the Community Plan and sought zoning variances to allow the construction of 41 luxury homes on their 55 acres immediately east of the current Canyon Hills project. The Duke project would have graded 640,000 cubic yards of hillsides to create the lots, and the plans called for many of the homes to be located on the ridges of the hillsides.

After years of meetings and hearings, it was finally determined that Duke could only build what was legally allowed by the zoning and various land use ordinances – 10 homes. The denial of their original bid, and subsequent approval of a plan that followed existing zoning and land use laws (including taking homes off the ridges and hillsides), is a legal precedent that must be considered in light of Whitebird's Canyon Hills proposal to seek the same types of variances and discretionary approvals.

The same issues arise in Canyon Hills as were present in the Duke proposal – only Canyon Hills will have nearly 7 times the number of homes, involve nearly 9 times the grading, and negatively affect over 6 times the amount of acreage!

Whitebird specifically identifies the Duke Project (Related Project No. 7) as being similar to the proposed (Canyon Hills) project. They say, "All of the related projects, including the Duke Project, are subject to the same development standards and environmental review as the proposed project. The Duke Project is considered to be compatible with the proposed project and the existing residential uses northeast of the project site. The Duke Project is similar in nature to the proposed project (i.e., low-density, single-family homes) and has been subject to the same environmental review and regulations as the proposed project". **If, in their own words what they say is true, then it necessarily follows that Canyon Hills will abide by the same rules that the Duke Project was forced to follow – the Community Plan, existing zoning and land use regulations!**

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Furthermore, the Duke property is currently in the process of being acquired by the Santa Monica Mountains Conservancy to be preserved as open space. When this acquisition is complete, it will render the Canyon Hills project as categorically incompatible with its most immediately adjacent neighbor.

Canyon Hills (as it is proposed in the DEIR) is so far out of acceptable bounds for consideration that it would be an insult to the community that opposed Duke Development, to the Councilpersons and staff from CD2 that opposed it, and to the very process by the City Planning Department and Planning Commission that led to this precedent-setting decision in late 2001. Perhaps the Planning Commission will recall that 50-80 people attended every advisory agency and committee meeting and over 100 people wrote comments on their DEIR opposing it. Public interest in the outcome of Duke extended all the way to the City Council hearing where it was finally laid to rest. The Canyon Hills proposal is already generating more controversy than Duke ended up causing after 4 years, so one can expect that public opposition to Canyon Hills will reach record levels for any proposal in our area since the golf course in Big Tujunga Canyon.

Of the alternatives proposed by Whitebird in the DEIR, the only interesting one (besides Alternative A - No Project) is Alternative D - Reduced Density 87 Lots, if it indeed complies with existing zoning and land use ordinances. Unfortunately, the section detailing this alternative is inadequately written to fairly consider it at this time. However, the Planning Department should request more accurate information to see if this is a viable alternative.

Level of Significance, Even After Mitigation

The proposed project's land use impacts would be precedent-setting, counter to the intent and the actual wording of the Community Plan, and extremely significant in a negative way in terms of grading and incompatibility with surrounding communities.

Most significant over all, though, is that **the Community Plan specifically identifies this area, the land that Whitebird has purchased or optioned over the past 6-10 years, be maintained as Minimum Density due to its steepness and incompatibility with hillside grading (Map Footnote #15).**

Conclusion

The Community Plan has been in existence for many years prior to Whitebird purchasing the land they want to develop. Sophisticated developers, and Whitebird is one, will always

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be aware of the rules and regulations under which they must operate. There is no excuse for ignorance of the laws, and as far as I can tell Whitebird has never claimed ignorance. There is also no "right" for any developer to receive discretionary approvals for the kinds of amendments and variances they are requesting simply because, as they state, they cannot make a profit if they are forced to follow the rules. The rules were in place before the property was purchased.

So the only approach they have available is to request changes to the zoning and amendments to the Community Plan (and the General Plan, when altering land use designations) in the public forum known as the "planning process". Amongst other things, the purpose of this process required by the City of LA is to hear facts and opinions as to why a change or amendment should be denied or allowed when it contradicts the stated rules and intent of the Community Plan. If the Planning Department truly considers all the facts of this DEIR, it must conclude that Canyon Hills be denied as proposed since it is inconsistent with the letter and intent of the Community Plan. Quoting from the "Citizen's Guide to Planning" on the City of LA's web site:

"The local general plan can be described as the city's or county's "blueprint" for future development. It represents the community's view of its future, a constitution made up of the goals and policies upon which the city council, board of supervisors, and planning commission will base their land use decisions. To illustrate its importance, all subdivisions, public works projects, and zoning decisions must be consistent with the General Plan. *If inconsistent, they must not be approved.*" (emphasis added).

Furthermore, directly from the Community Plan: **Chapter II, Role Of The Community Plan, Page II-2** - "The General Plan clarifies and articulates the City's intentions with respect to the rights and expectations of the general public, property owners, and prospective investors and business interests. Through the Community Plan, the City can inform these groups of its goals, policies and development standards, thereby communicating what is expected of City government and the private sector to meet its objectives."

The Planning Department cannot lightly make changes to the Sunland-Tujunga-et al Community Plan (through the granting of variances and amendments) since many thousands of people have already made home purchasing decisions based on the characteristics of the general community as expressed in this plan. If Whitebird is allowed to alter the character of the existing neighborhood with their amendments and variances, the rights of existing residents and taxpayers who based their purchasing decisions on the zoning and land use rules would be permanently affected.

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In closing, I want to emphasize that the Community Plan is intended to be a guideline under which we all must live to have a semblance of order to our communities upon which we can rely. It is the responsibility for each of us to know about the Community Plan and the rights it conveys to all property and business owners. If major changes are required to the Community Plan itself, it is incumbent on the City Council to open up the process once again to public hearings specific to the purpose of amending or changing the Plan, not within the context of one developer's proposal to build high density housing within the Plan boundary. Specific requests to amend the Plan, if they are precedent-setting, should be subject to a democratic vote of the public at large.

I hope this information has been helpful. Please contact me with any comments.

Steve Crouch
Canyon Area Preservation

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**Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon
Community Plan
Excerpts Relating To Land Use and Community Participation
CAP Comments in brackets relating to Consistency of the Canyon Hills DEIR**
□

Chapter I - Introduction, Community Participation, Page I-2 – The State of California requires citizen participation in the preparation of the General Plan. Government Code Section 65351 reads “During the preparation or amendment of the General Plan, the planning agency shall provide opportunities for involvement of citizens, public agencies, public utility companies, and civic, education, and other community groups, through public hearings and any other means the city or county deems appropriate.” Community participation occurred through focus group meetings and through the open house and public hearing process to assist in identifying community issues and formulating land use policies and objectives. **[Canyon Hills requires public hearings specifically on the amendments to the General and Community Plan, not simply on an application for a specific development.]**

Chapter I - Community Issues And Opportunities, Residential, Page 1-2 through 1-3 – Issues:

- Need to preserve single family neighborhoods **[Consistent]**
- Need to preserve and enhance existing housing stock **[Partially Consistent]**
- Need to limit expansion of multi-family designated areas **[Consistent]**
- Need for more affordable housing **[Not Consistent]**
- Need for regulation of hillside development **[Not Consistent]**
- Need for housing, jobs, and services in mutual proximity **[Not Consistent, will result in pressure for commercial development near this project, which is inconsistent with zoning]**
- Undeveloped or underdeveloped land allowing opportunities for clustered development **[Partially Consistent]**

Chapter I - Community Issues And Opportunities, Neighborhood Character, Page 1-4 – Issues:

- Scale, density, and character of buildings that complement surrounding uses **[Not Consistent]**

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- Effects of residential development on commercial corridors [**Not Consistent, overloads streets feeding existing commercial corridors**]
- New hillside buildings blocking views or presenting an unsightly view from below [**Not Consistent, development of the Duke Ridge, which is "Prominent" according to the Scenic Plan in the upper areas, will block views and create an unsightly view from below**]
- The need to preserve and rehabilitate areas with sensitivity to the character of established neighborhoods [**Not Consistent**]
- Efforts aimed at preservation of the low density, rural character and of the equestrian lifestyle [**Not Consistent**]
- Potential development of large parcels provide opportunities to enhance community identity [**Not Consistent**]

Chapter II, Function Of The Community Plan, Statutory Requirements, Page II-1 – The Land Use Element has the broadest scope of the General Plan elements required by the State. Since it regulates how land is to be utilized, many of the issues and policies contained in all other plan elements are impacted and/or impact this element. [**Not Consistent. Requested amendments and zone changes fundamentally alter land use in the area, and should require public hearings**]

Chapter II, Organization and Content of Community Plan, Page II-3 – The principal method for the implementation of the Land Use Map is the Zoning Ordinance. The City's Zoning Map must be updated to remain consistent with the adopted Land Use Map. Together, the Zoning ordinance and the Zoning Map will identify specific types of land use, intensity of use and development standards applicable to specific areas and parcels of land within the community. [**Not Consistent. Requested zoning changes redefine land use beyond what was envisioned in the Community Plan. Any variances from established zoning must be part of a general public debate, and not obscured by the selfish needs of an individual developer.**]

Chapter II, Plan Consistency, Page II-5 – City actions on most discretionary projects require finding that the action is consistent or in conformance with the General Plan. In addition to the required general finding, decision-makers acting on certain projects in the Plan area shall refer to each of the applicable additional findings that the Plan identifies as programs in Chapter 3 of the Plan. To further substantiate the consistency findings, decision makers may cite other programs, policies or objectives which would be furthered by a proposed project. In addition, Chapter 5 of the Plan requires a decision maker to make

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a finding of conformance with applicable design standards for discretionary projects. **[Not Consistent. Proposed project is in direct violation of Chapter III. Decision makers should not be allowed to approve this project as proposed.]**

Chapter III, Land Use Policies and Programs, Page III-2 – The community includes large areas of open space and natural landforms. It is one of the more rural areas of the City and supports a substantial equestrian-oriented population. It is a policy of the Plan to protect these areas from encroachment by incompatible uses. **[Not Consistent]**

Chapter III, Goal 1 Objective 1-2.1 – Locate higher residential densities near commercial centers, and major bus routes where public service facilities, utilities, and topography will accommodate this development. **[Not Consistent. Canyon Hills is a high density housing project, located far from commercial centers and major bus routes, necessitating the use of cars for every errand.]**

Chapter III, Goal 1 Objective 1-3.1, Page III-4 – Consider factors such as neighborhood character and identity, compatibility of land uses, impacts on livability, impacts on services and public facilities, impacts on traffic levels, and environmental impacts when changes in residential densities are proposed. **[Partially Consistent. The Canyon Hills DEIR does indeed consider these issues, but reaches incorrect conclusions regarding every point.]**

Chapter III, Goal 1 Objective 1-3.3, Page III-4 – Preserve existing views of hillside and mountainous areas. **Program:** retention of the low density rural character of the community and height limitations, scenic highway designations, implementation of the Citywide Hillside Ordinance and the 15% Slope Density Ordinance will contribute to the preservation of these views. **[Partially Consistent. Canyon Hills will follow the height restrictions, but fails on the Hillside and 15% Slope Density Ordinance because they will grade down the hills that cause them problems.]**

Chapter III, Goal 1 Objective 1-6, Page III-5 – To limit residential density and minimize grading in hillside areas. **Policy: 1-6.2:** Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area. **Program:** The Plan designates hillside areas in the Minimum and Very Low Densities of the General Plan and use designations and corresponding zones. Continue implementation of the Citywide Hillside Ordinance and the 15% Slope Density Ordinance. **Policy 1-6.3:** Require that grading be minimized to reduce the effects on environmentally sensitive ar-

CANYON AREA PRESERVATION

Information about preserving our canyons, hillsides, and the foothills.

eas. **Program:** Compliance with the California Environmental Quality Act (CEQA) requires that local and state governmental agencies consider and disclose potential environmental effects of a project before rendering a decision, and provide methods to mitigate those impacts. **[Not Consistent in a big way! They certainly consider the steepness of the topography and conclude that the steep hills should be graded flat so they can build!]**

Chapter III, Goal 1 Objective 1-7, Page III-5 – To insure compatibility between equestrian and other uses found in the RA Zone. **Policy 1-7.1:** Place a high priority on the preservation of horsekeeping areas. **Program:** A decision-maker involved in a discretionary review should make a finding that the zone variance, conditional use, or subdivision does not endanger the preservation of horsekeeping uses within the Community. **[Not Consistent. A 3-acre equestrian park with limited parking and no plan for management fails to address the needs of the equestrian community. This DEIR does in fact threaten the future viability of horsekeeping in the area.]**

Chapter III, Goal 1 Objective 1-8, Page III-6 – 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. **Policy 1-8.1:** Protect existing single-family equestrian oriented neighborhoods and horsekeeping districts from encroachment by higher density residential and other incompatible uses. **Policy 1-8.2:** Horsekeeping areas should be developed at Minimum to Very Low densities appropriate to such use. **Policy 1-8.3:** new horsekeeping districts should be expanded where appropriate and feasible. **[Not Consistent on all counts!]**

Chapter III, Goal 5 Objective 5-1, Page III-13 – To preserve existing open space resources and where possible develop new open space. **Policy 5-1.2:** Protect significant environmental resources from environmental hazards. **Program:** A minimum 100-foot buffer zone should be designated from the top of channel bank for all riparian habitats. **Policy 5-1.4:** Preserve as much of remaining undeveloped hillside land, as feasible, for open space and recreational uses. **Program:** The City should encourage continuing efforts by the County, State, and Federal agencies to acquire vacant lands for publicly-owned open space. **[Partially Consistent. The open land that is already open will remain open in Canyon Hills plan. However, there are several riparian habitats on their Site that will not be protected as per Policy 5-1.2. The City should explore ways to acquire the en-**

CANYON AREA PRESERVATION

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tire project from Whitebird to ensure it will remain compatible. This developer is not proposing responsible development.]

Chapter III, Goal 14 Objective 14-2, Page III-25 – To provide for the maintenance, linkage, and development of equestrian trails for recreational use. **Policy 14-2.3:** Encourage the development of equestrian trails through residential areas appropriate for horsekeeping. **Program:** All future subdivisions should provide access to the equestrian trail system in these areas. **Policy 14-2.4:** Existing trails should be protected from encroachment by incompatible land uses. New trails should be expanded where appropriate and feasible. **[Not Consistent. Existing trails are being encroached, and replaced by substandard equestrian access.]**

Chapter IV, Coordination Opportunities For Public Agencies, Page IV-3 – Housing Item #6: Allow for the assembly and trade of public land in order to encourage the construction of housing in appropriate locations within the Plan area. **[Not Consistent. Whitebird should reconsider the appropriate location of development on this property.]**

Chapter V, Special and Unique Design Features, Scenic Highways, Page V-8 – Plans for development of the Scenic Corridors indicated in this Plan should also be prepared and implemented. These plans should include:

1. Roadway design. **[Consistent]**
2. Location and development of view sites and recreational areas. **[Unclear about the location or type of amenities referred to in the DEIR]**
3. Controls on use and intensity of use of lands within and/or adjacent to the Scenic Corridor. **[Not Consistent]**
4. Prohibition and/or control of signs and billboards. **[Not yet known]**
5. Location of other necessary public facilities. **[N/A]**

Map Footnotes, Pages F-1 and F-2:

#4: 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. **[Not Consistent]**

CANYON AREA PRESERVATION

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#6: Desirable Open Space is land which possesses open space characteristics which should be protected and where additional development controls such as proposed in the Open Space Plan are needed to conserve such characteristics. These lands may be either publicly or privately owned. **[Partially Consistent. Their dedication of open space should be enforced on land they have identified, even if they do not overtly own the property. The danger to their offer is the owners of the land may not agree to the arrangement. Whitebird may not be the owner of record for much of the land they are offering for open space.]**

#7: Subdivision in steep hillside areas shall be designed in such a way as to preserve the ridgelines and the steeper slopes as open space, limit the amount of grading required, and to protect the natural hillside views. The total density allowed over the entire ownership shall be clustered in the more naturally level portions of the ownership. Density in the clusters shall not exceed that permitted in the Low density housing category for areas that are not in "K" districts, and shall not exceed that permitted in the Very Low I category for areas that are within a "K" district. **[Not Consistent. This proposal is for more houses than are allowed over the entire ownership. They are not limiting the amount of grading. They are stripping hillsides down to lower elevations, not protecting the natural hillside views.]**

#15: Development located between the Sunland-Tujunga-Lake View Terrace-Shadow Hills-La Tuna Canyon Community Plan boundary line on the south, the DWP right-of-way on the northeast, and Sunland Boulevard on the northwest having a natural average grade of 2:1 or steeper shall be limited to Minimum Density. **[Not Consistent. This Footnote prohibits the type of development proposed by Whitebird for this area.]**

#19: There shall be no grading of the principal ridge lines within the Plan boundaries. Designation of principal ridge lines shall be determined by the Advisory Agency. **[Partially Consistent. The Scenic Plan is redefining what is meant by Principal Ridge Lines. The Duke Ridge (the upper part of a major ridge that continues onto Whitebird Property) is considered Prominent, but Whitebird's development of the lower portion of the same ridge is inconsistent.]**

Addendum Statement: It is the intent of the Plan that the entitlements granted shall be one of the zone designations within the corresponding zones shown on the Plan, unless accompanied by a concurrent Plan Amendment.

CANYON AREA PRESERVATION

Information about preserving our canyons, hillsides, and the foothills.

General Statement Regarding Zoning From The Municipal Code: Property is always held subject to the valid exercise of the police power. The theory of vested rights relates only to such rights as an owner of property may possess not to have his property rezoned after he has started construction thereon or was making a use thereof permitted by law, when such obstruction or use does not constitute a nuisance and the adoption of the zoning ordinance does not give a property owner any vested rights.

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Attachment 152b

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Property Address	Sort by: Proximity	Sales Price	Sales Date	Bedrooms	Square Feet	Year Built
10117 MOUNTAIR	0.49	240,000	04/04/2003	2	500	1920
10354 HELENDALE	0.53	235,000	04/23/2003	2	500	1925
10233 TUJUNGA CANYON	0.66	251,000	06/24/2003	2	750	1925
10532 FERNGLEN	0.81	250,000	06/27/2003	2	750	1950
10535 REDMONT	0.89	261,000	04/30/2003	2	750	1950
10536 WILSEY	0.74	260,000	06/13/2003	2	750	1950
10650 REDMONT	1.00	258,000	03/28/2003	2	750	1940
7557 VALAHO	0.22	240,000	06/10/2003	2	750	1945
10222 HELENDALE	0.35	249,000	10/24/2002	2	1000	1945
10349 HELENDALE	0.52	273,500	04/11/2003	3	1000	1950
10520 MCCLEMONT	0.78	265,000	03/20/2003	2	1000	1940
7283 LAS PLUMAS	0.67	230,000	02/19/2003	3	1000	1950
7380 VALAHO	0.47	275,000	04/24/2003	3	1000	1975
7442 SUMMITROSE	0.75	269,000	06/30/2003	2	1000	1950
7617 WYNGATE	0.48	273,000	07/23/2002	2	1000	1945

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12-29-03 CANYON HILLS DEIR
RITONDA HERBEL

Exhibit A 1

Yahoo! Real Estate

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Property Address	Sort by: <u>Proximity</u>	<u>Sales Price</u>	<u>Sales Date</u>	<u>Bedrooms</u>	<u>Square Feet</u>	<u>Year Built</u>
7328 VERDUGO CRESTLI	0.04	300,000	06/19/2003	3	750	1925
9709 HILLHAVEN	0.33	292,500	03/11/2003	2	750	1925
9936 REDMONT	0.23	226,000	12/19/2002	2	750	1920
7283 LAS PLUMAS	0.28	230,000	02/19/2003	3	1000	1950
7380 VALAHO	0.37	275,000	04/24/2003	3	1000	1975
9800 HILLHAVEN	0.28	270,000	03/06/2003	4	1000	1945
9927 REDMONT	0.23	240,000	12/31/2002	3	1000	1925
10227 MCCLEMONT	0.74	257,500	03/25/2003	3	1250	1940
7334 VERDUGO CRESTLI	0.03	279,000	07/24/2002	2	1250	1925
7347 VALAHO	0.37	280,000	06/05/2003	2	1250	1950
7420 VALAHO	0.40	265,000	05/06/2003	3	1250	1985
9540 REVERIE	0.24	282,000	02/14/2003	2	1250	1945
9736 HILLHAVEN	0.32	246,000	03/14/2003	3	1250	1955
7370 VALAHO	0.33	327,000	06/24/2003	3	1500	1990
7671 MCGROARTY	0.68	329,000	07/02/2003	3	1500	1965
9611 HILLHAVEN	0.19	319,000	07/29/2002	4	1500	1995
9779 SAMOA	0.50	335,000	05/05/2003	3	1500	1990
7336 VERDUGO CRESTLI	0.03	353,000	12/14/2001	3	1750	1925
7437 TRANQUIL	0.40	329,000	07/19/2002	3	1750	1985
9628 HILLHAVEN	0.25	365,000	06/03/2003	3	2000	1990

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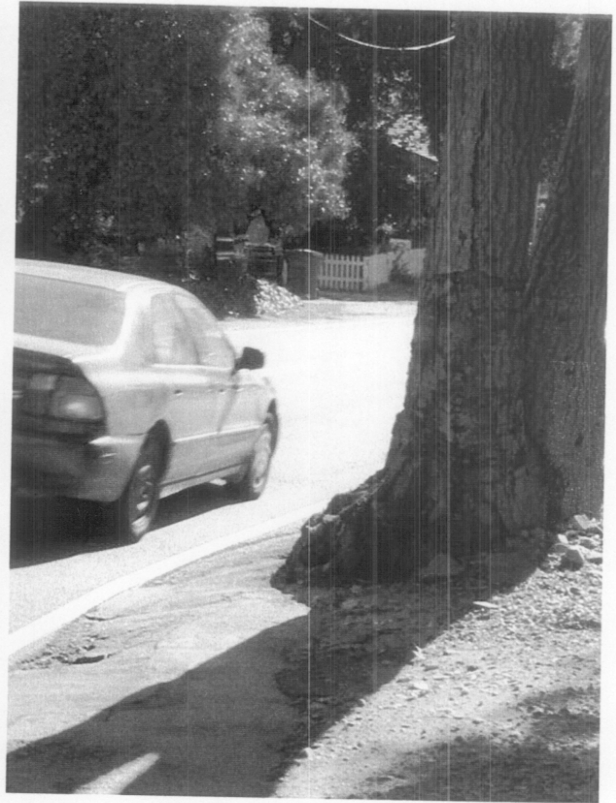
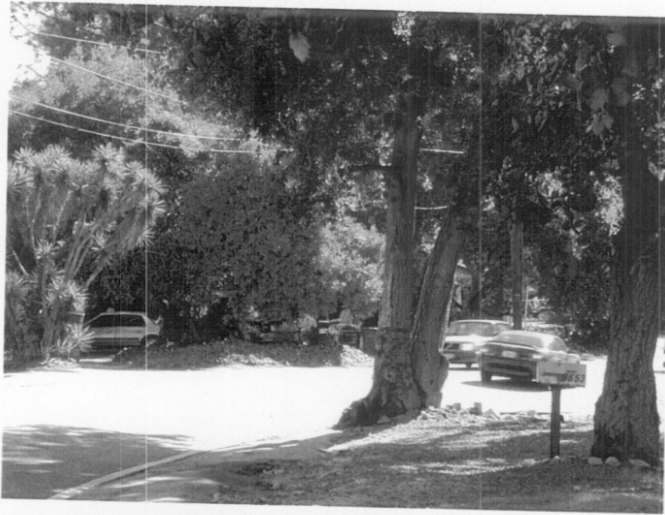
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2-29-03

CANYON HILLS DEER
RHONDA HERBEL

Exhibit A2



TUSUNGA CYN BETWEEN FOOTHILL BLVD + LATUNACYN
EMERGENCY ROUTE + MAJOR TRAFFIC ROUTE

RHONDA HERBEL
CANYON HILLS DEIR

EXHIBIT B1

November 6-12, 1955
La Tuna Canyon Fire

In Memory of
Auto Fireman James L. Catlow
of
Engine Company 39
Who died of burns fighting
This fire on November 12, 1955
And Posthumously Awarded the Medal of Valor.

The La Tuna Canyon Fire

By ROBERT T. DOVE
Mountain Patrol



As nearly as it can be determined, the La Tuna Canyon holocaust had a very innocent and unspectacular birth. Two eight year old boys, in their own back yard in the 9600 block of La Tuna Canyon, and, without any malicious plans for the future, were preparing a noonday feast. A strong easterly wind carried enough of their fire across a clearing to ignite the adjacent hillside brush. One of the boy's father responded with department-like speed to their cry for help and valiantly attempted to extinguish the burning grass and brush with a garden hose. The wind quickly drove the fire through the tinder dry fuel and out of his reach. The father immediately called the fire department and the rest of the account of the fire is a matter of radio log history. The first-in Company reported a large, rapidly growing brush fire and immediately asked for additional help. This indication that a major brush fire was burning out of control heralded in five nightmarish days and nights of wind driven fires in the rugged western half of the Verdugo Mountains.

The 1955 La Tuna Canyon fire is actually a series of fires that burned in many directions at the beckon of wind and terrain conditions. At various times there were two or three major fire heads on the rampage simultaneously. A daily box score might help straighten out the maze of radio messages and on-the-scene reports that were issued.

Sunday, Nov. 6—
12:30 P.M. to 2:00 P.M.

CANYON HILLS DEIR

Exhibit C1

Fire traveled north and east to the Shadow Island Dr. area and an attempt was made to hold along the Green Verdugo Fire Road.

Comment Letter No. 152
Attachment 152d

1:45 P.M. to 3:00 P.M.

A second and separate fire in the 9800 block of La Tuna Canyon. This was maliciously set by an eleven year old boy who apparently wasn't satisfied with the fire to the north.

2:00 P.M. to 5:00 P.M.

Fire jumps Green Verdugo Fire Road on a half-mile front and is stopped above the homes along Day and McGroarty Streets, west on Ora Vista.

6:00 P.M. to 8:00 A.M., Monday

Fire break constructed along east flank of the fire from the Green Verdugo Fire Road to the St. Elizabeth grounds in La Tuna Canyon.

Monday, Nov. 7—

10:30 A.M. to 12:00 Noon

Fire breaks out of the Shadow Island Dr. area and is driven north and west to Sunland Blvd.

12:00 P.M. to 3:00 P.M.

Fire is driven south and west to La Tuna Canyon, Tuxford St. and Sunland Blvd.

3:30 P.M. to 4:30 P.M.

Fire front moves east to endanger homes in the Glencrest-Bluffdale area.

5:30 P.M. to 6:30 P.M.

Fire front moves west and south to Glenoaks Blvd.

7:00 P.M. to 10:30 P.M.

Fire front moves east to cross Wildwood Fire Road and south across Chandler Fire Road to the Mother Cabrina area.

10:30 P.M. to 9:00 A.M. Tuesday

Fire moves slowly to the east in the high hills between La Tuna Canyon and Glen Oaks Blvd.

Tuesday, Nov. 8—

10:00 A.M. to 2:00 P.M.

Fire moves rapidly to the east up La Tuna Canyon and sweeps over the Tujunga hill-side homes on Reverie Road and Tranquil Dr.

2:00 P.M. to 9:00 P.M.

Fire continues east toward the Hostedder Fire Road and south toward the Verdugo motorway.

2:00 P.M. to 3:00 P.M.

Fire moves north toward Tujunga and is stopped behind the homes along Verdugo Crestline Dr.

3:00 P.M. to 11:00 P.M.

Extensive back firing along the Green Verdugo Fire Road blocks any further northward progress of the fire.

Wednesday, Nov. 9

Cold trail and patrol operations of the fire area.

Thursday, Nov. 10

Continued cold trail and patrol operations.

12:30 P.M.

Flare up along Verdugo Crestline Dr.

Friday, Nov. 11

Continued cold trail and patrol operations.

Saturday, Nov. 12

Completed cold trail and patrol operations.

Exhibit C1

The many directional shifts of the fire clearly indicates that erratic wind conditions hampered the Department effort to control this fire more than any other single factor. Fire fighting efforts were further compounded by an inadequate water supply and road conditions throughout the major part of the fire area.

It will be necessary to describe this fire and the fire control operations as a series of separate fires. Bear in mind this one very important fact--the control and final extinguishment of the La Tuna Canyon Fire was accomplished through the combined cooperative effort of many individuals and agencies. It is not possible to record individual or agency credit in an article of this size. Still, in fairness, it must be clearly established that the cooperation of outside agencies contributed immeasurable to the successfulness of the operation. The Los Angeles County Fire Department furnished many fully manned Engine and Tank Companies as well as the steady procession of Camp Crews and bulldozers seen in operation throughout the extent of the fire. The Federal Forestry gave us timely aid with six pieces of fire equipment with crews and a large hand tool crew. The fire departments of Burbank and Glendale added some very needed additional assistance whenever it was required.

When you consider this and the assistance contributed by the Police Department, the Board of Education, the Red Cross and other agencies, and the hundreds of hardworking citizens, the surprisingly low property loss figure is readily understandable. Now let us examine the records as it points out one fire at a time.

THE SUNDAY FIRE

It has already been stated that a growing major brush fire greeted the first assignment companies as they pulled in to the fire. Their efforts were directed at curtailing the lateral movement of the fire along the north wall of La Tuna Canyon. By this time, the fire had such a speed, that catching it along the ridge was out of the question. As additional companies arrived, they were sent up Sunland Blvd. to Shadow Island Dr. and up a dirt road that is called "the airport road." The main ridge south of Sunland Blvd. has been fairly well leveled off in an unsuccessful effort to give the San Fernando Valley a fog-free airport. Though it is no landing strip, it is an ideal fire break and with aggressive hose line work, the northern and western movement of the fire was temporarily brought under control.

The eastern flank of the fire posed an entirely different problem and was later to give us no end of trouble. At this time, the directional head of the fire was to the east over rugged brush covered hills and canyons. This area has no fire breaks or fire roads and the fire gave the tractor crews no time to construct hasty breaks.

One energetic attempt to block the eastern progress of the fire was made with the net result of proving once again, that a 4-wheeled drive tank wagon will go practically anywhere that there is room for its tires. Utilization ridge lines and trails suitable only for goats or bulldozers, the tank wagon with an eager 15-man crew gave the fire a temporary setback. As it proved out, this effort was 10 minutes late and a 1000 foot of hose short.

When this effort failed, a fear became a fact! Now it was clearly demonstrated that the City of Los Angeles had an uncontrolled fire burning in inaccessible terrain. Further, the fire was burning so swiftly that there was little possibility of establishing an organized position to block the fire's immediate progress. By 1:45 P.M. rugged terrain and a strong wind gave the initiative to the fire, and for the next four hours, the fire fighter fought a dangerous and heroic defensive battle. No homes were lost, but Autofireman James Catlow was so severely burned that it cost him his life.

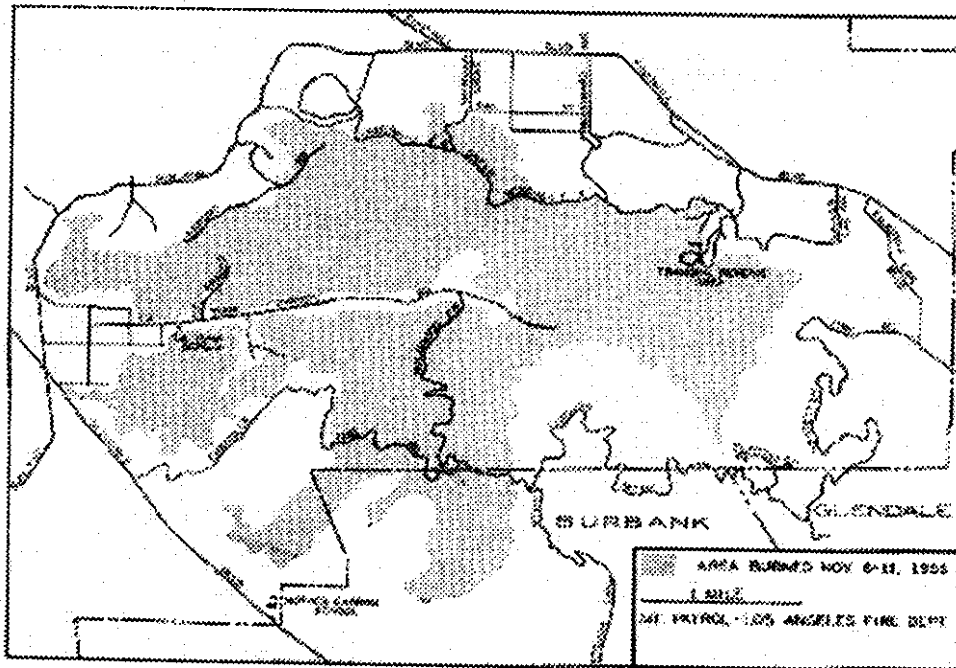
Separating the homes in Sunland from the fire was a single brush covered ridge. Running along the crest of this ridge strategically located turn-arounds and water tanks, and has been fire tested many times in the past as an adequate defensive position. Once again the decision was made to defend along the road. Hastily, the equipment was redirected to this location. A 2 1/2" hose line was laid from the fire road down to a hydrant on the Sunland side and was immediately loaded. About 10 pieces of equipment were on hand to be spotted when a very dangerous situation developed. The wind suddenly changed toward the north and drove the fire out of the lateral canyons and up the slope toward the Green Verdugo Fire Road. Though this action on the part of the fire was anticipated, its speed and the intensity was simply overpowering. Quickly, the rigs were spotted in the closet available cover and many protective lines were laid. For a distance of 100 or more feet along the road, the fire was aggressively, though futilely fought. 1 1/2" fire streams nearly disappeared in the furnace-like heat. As the main body of the fire swept over the position, all water was directed to protect the men and the equipment from the effects of the intense heat. Men without hose lines laid in the mud and were kept wet from nearby rigs. Some men stacked up on the ground like hot cakes with the top man keeping the pile wet with a hose line.

It was during this momentary eternity that Autofireman James Catlow brought everlasting credit to himself as well as everyone in the fire service. Hose Wagon 39 was in a narrow spot in the road, as the fire hit there too fast to actually get set. He was able to get two lines into action, and by working one, he performed superhumanly in an effort to protect his equipment for future use, and to keep the road open for men who were ahead of him. His injuries were not accidentally incurred, as he could have retreated merely 10 yards to relative safety. His act of heroism required unbelievable determination and demonstrates to all to see and realize that a devoted fireman will do his full duty regardless of personal cost.

Exhibit C1

The fire swept over the Green Verdugo Fire Road on a half-mile front and continued its relentless courses toward the many homes along Day and McGroarty Streets in Sunland. Attempts were made at both the east and west flanks to stop the downhill progress of the fire, but it quickly outdistanced the available tanks and pumpers were hurried into the Sunland community and the northern movement of the fire was stopped on the slope, before the homes were endangered. At the same time, tractors constructed hasty breaks along the flanks of the fire. By 5:00 P.M. this northern front was secured.

An hour later a mass of City and County personnel and equipment was assembled on the eastern flank of the fire on the Green Verdugo Fire Road. Three bulldozers and nearly one hundred men with hose lines and hand tools worked throughout the night to construct a fire break down into La Tuna Canyon. Proof of their good work is attested to by the fact that no amount of wind and flare ups could push the fire across the break they constructed. This type of night operation is very hazardous, and two stuck bulldozers in the burning brush, many falls, and countless crashing boulders impressed this truth on everyone's mind. In spite of the difficulties, everyone was justly proud of their work on the Sunday Fire.



THE MONDAY FIRE

Monday was the day of big plans. Monday was also the day of big winds. The big plan phase of the day began about two in the morning. Even the most pessimistic planner could vision the final containment of the fire by noon. The "B" shift "firefighter" gave the A shift "cold trailer" the usual pep-talk routine. From all indications the day's work was going to be a routine operation of putting the fire to bed and picking up the hose. By working all through the night on the east and south flanks, the big job was done. We thought!

Around 2:00 a.m., Monday morning, the west flank began to flare up down in Del Arroyo Canyon. It was a lazy little fire without much promise for the future. With reluctance, it was determined that this flank would have to wait until dawn to be secured. Actually the terrain was so rugged and unfamiliar that a night operation was considered too risky to personnel. At the time, it appeared wisest to plan and assemble men and equipment for a daylight attack. Considering everything, it was a rosy dawn on Monday morning.

Now in this area, early morning winds are rare, seldom if ever are they gusty, and they simply never blow to the north west. Yet this was the combination that faced the fire fighter. The prepared line went down into the canyon quickly and an energetic attempt was made to halt the fires westward move. Frustratingly, the fire kept just beyond the reach of the nozzle. Soon the wind took charge of the situation and drove the fire up the north wall of the canyon toward the Sunland Blvd.-Dale Ave. area. This flare-up was aggressively fought, and with a directional change in the wind, was soon controlled.

This change in the wind was certainly no bargain. Because of this severe and gusty north wind, the fire fighter battled one crisis after another from 10 o'clock in the morning until 10 o'clock at night. Control of the fire as utterly out of the question. Just saving homes, taxed the capabilities of the fire fighter to the utmost. For every fireman on the scene, this was certainly one day of trial by fire. With brains, guts and a little water, nearly a hundred homes were saved from destruction or damage by fire.

Tank wagons and Patrol trucks had a field day in this fast traveling fire. For the most part, the fire did not allow enough time for an Engine Company to lay and pick up. Getting set once during the six or seven periods of crisis was a real

Sach. Pitts

The spread of this fire is more easily realized by stating that two mountain Patrolmen in one rig layed hose, fought fire, picked up and moved to the head of the fire, eight separate times during a forty minute period. The success of a score of tank crews is indicated by the low structural loss figures. Ignoring an unknown amount for contents, \$12,000.00 should cover the losses of the Nursery office, two garages and the various sheds destroyed.

One illustration of fire fighting during "Operation Leapfrog" can be considered typical of the whole day's work. Envision a rig racing into the yard of a hillside from just minutes ahead of the onrushing fire. Hose lines were quickly laid and loaded by the tired but well drilled crew. The driver stuffs every available garden hose into the top of the tank and starts refilling regardless of the water level in the tank. Hurriedly the structures are closed up, then shrubbery and combustibles are cleared away from the structures and butane tanks. The long cared for cypress hedge is put to the axe, and the wail of the property owner is answered with a friendly "I'll chop-you push." Occasionally burning out ahead of the fire is started where there is time. There the fire hits and for the next 3 or 4 minutes, the fire fighter lives in a nightmare of blowing smoky heat, sparks and dirt while he keeps himself, the structure and the rig covered with water. After the main fire passes, the little fires around the house are extinguished, the roof and eaves wet down, and the inside of the house and attic is checked. Then the hose is "figure eighted" on the top of the rig and the race is on once more to get ahead of the fire. Left behind is one more example to prove that a determined crew with reasonable clearance and a little water can save someone's home and years of memories from destruction by fire.

Monday was a day of successful defensive fire fighting. The fire fighter never looked better in his whole life.

THE TUESDAY FIRE

This was the day the wind blew toward the East! During the early morning hours the homes along the upper canyon floor of La Tuna were protected by a large fire fighting force as the fire moved eastward behind them. By nine o'clock in the morning the fire had crossed over and outflanked a fire break that had been laboriously constructed during the night. The wind came up early and began to push a large fire up La Tuna Canyon toward the Tujung homes that lie in a big brush filled basin at the top of Hillhaven Ave.

As in the rest of the Mountain area, this fire has been preplanned for years by the first-in company and the mountain patrol. A careful survey indicated that 43 homes would be directly threatened by a large fire in this area. By 10 o'clock in the morning this anticipated large fire was an immediate reality. Here again, the speed of the fire vastly increased the danger to the fire fighter and reduced the time of preparation. All available tank wagons, booster tanks, and all Mt. Patrol rigs were rushed to this area. The water supply in the vicinity was reinforced by a hose line up Hillhaven from Foothill Blvd. Through a combination of sound planning, good leadership and a maximum effort by all concerned, we were ready when the fire hit.

The fire had a front of approximately two blocks initially. It was the most impressive phase of the week long battle. Preceding the fire line by 75 yards was a wave of flame over 100 feet high. There was no smoke at ground level and surprisingly little heat as volumes of fresh air were being sucked into the fire. The noise of the fire and the fact that the sun was completely blotted out, contributed more to the unreality of the situation than did the heat.

For the fireman on the scene, there was little or no time to watch the awesomeness of the fire or the queer antics of the domestic animals as they were freed from their pens. It was the same old familiar rush of clearing combustibles away from structures and butane tanks and of laying the all important hose lines.

These facts can be flatly stated here and now. Every home that could be saved by the use of water, was saved. Tank vehicles should not waste any water in wetting down thick brush ahead of such a large fire--save every drop for the personnel, the structure and the rig. The mobility of a water carrying rig in this type of a fight is of singular importance. When one house is safe, pick up, refill and become available to the officer in charge.

The main body of the fire swept over the homes in the Reverie Road-Tranquil Dr. area at about 11 o'clock in the morning. The local inhabitants, who barely got out of the path of the fire with an armload of valuables were afforded a dreadful view from various vantage points. All that could be seen through the smoke and fire were glimpses of firemen working small lines and rigs moving to the various houses. Not even the bravest soul would predict even limited success for the 40 to 50 firemen battling in the area. As the smoke cleared to reveal some homes still safe and as the radio reports began coming in, hope began to push aside the gloom. As before, the combination of guts, water, and a little clearing around the structures had won another battle against a powerful fire.

The emotional impact of this discovery on the part of the home owners cannot be described easily. A person who is forced to abandon his life long possessions and memories to apparently inevitable destruction by fire is not too coherent in his praise and thanksgiving when he finds that all is not lost. Fire and smoke failed to put the lump in the fireman's throat that came with the realization that the babbling praise and tear filled eyes of the local population was not caused by smoke and excitement.

Exhibit c 1

Even with all the efforts of the fireman, the fire took too big of a toll. Structure loss in this area were two homes and garages and nine sheds, all valued at \$40,000.00. This figure does not show the value of the contents of the structures, the damaged homes, or the destroyed domestic animals.

Though the main fire moved on to the east to be controlled by bulldozer and camp crews, the Tujunga community was far from safe. At about noon, the fire along the slopes of La Tuna Canyon turned north, and many homes along Verdugo Crestline Dr. were threatened. Each home was protected in turn as the fire came up to it. Even though everyone worked steadily for 2 or 3 hours, the fire nowhere reached its moving intensity.

At 3:00 p.m. drastic action was taken by the fire fighter that for once and for all was to take the initiative away from the fire. Large scale back-firing operations were commenced. It was clearly evident that the fire along the slopes of La Tuna Canyon would continue to burn northward on a wide front. In this area, the green Verdugo Fire Road is on the La Tuna downhill side, and it is not a good defensive position. It was wisely decided to back fire from the road even though a mile and a tenth is quite a fire to deliberately start.

The actual operation was a gigantic affair and smoked over 140 fire fighters and nearly thirty pieces of equipment. It required the hose and pumping duties of nine pumpers to furnish the relay line that was 2.1 miles long. Including patrol rigs, there were about 20 tank wagons used. Working with calculated movement, the job was completed in about six hours. The conduct of the operation was an organizational masterpiece. Additional men and equipment were sent up from Base Camp as they were required. The brush above the fire road was carefully wet down before back firing was commenced. Every inch of this private fire had over-lapping hand lines to keep it under control. Observers at vantage points were constantly on the lookout for spotting behind the back fire. Complete and enthusiastic cooperation on everyone's part was the order of the day. In all, it was a completely safe operation, even if it did scare the Sunland-Tujunga Civilians half out of their wits. They thought we were back firing from Catalina!

At about midnight, the main fire made its last big run. Flames estimated at one hundred feet high roared up to meet the back fire. By this time there were a hundred yards of cleared ground between the Fire Road and the main fire. Only small sparks got into the unburned brush, and in wet brush they did no harm. With the exception of one short lined flare-up on Thursday. The La Tuna Fire was all over but the shouting!

PATROLLING AND COLD TRAIL OPERATIONS

It is not fair to the firemen who successfully executed this operation to slight this phase of the fire. It's not that we pity them for the sweat they expended, but their's was an extremely important job.

Wednesday, Thursday, Friday and Saturday is officially logged as "Patrol and Cold Trail Operations." What a masterpiece of understatement!! Many men swung brush hooks and shovels for hours just to insure that the fire would not eat up one more valuable square foot of ground cover. Headlights and flashlights could be seen at all hours of the night in the areas that had not yet been secured.

This job was hard, unspectacular labor. From no angle can it be considered fun. The hills were steep and rocky and in some places the brush was so thick, axes had to replace the brush hook.

One typical operation took place early Friday morning. A night crew had come out for supper at midnight from a very steep area. They reported growth too big for brush hooks, a ragged fire line with large hot spots well into the unburned brush, and, a hose line at the crack of dawn was agreed upon as the solution for this situation. Men and equipment were assembled and the line was flanked out at the top. The hill was so steep, it took only 12 minutes to get 1750 feet of 1" hose down to the hot spots. Thirty minutes later, the fire was put out for keeps. It took two hours and a half of the most strenuous work to get the hose and crew back to the top. This operation points out the thoroughness and seriousness of the work of the cold trailing crew.

The value of a good cold trail shows up in two important ways. It insures that a fire, once controlled, will not rekindle to embarrass and plague a battleweary fire department. It prevents further burning and guarantees that additional tons of mud and boulders will not be washed down on the homes below when the winter rains strike. The cold trail does nothing for the burned over area, but it can represent thousands of dollars saved from the flood damage toll. The simple log book statement of "Patrol and Cold Trail Operations" represents miles of very successful cold trails and a well performed completion for a job of fire fighting.

The La Tuna Canyon fire didn't go out --it was put out! Every fire fighter can be justly proud of an excellent record and his job well done.

Exhibit C 1

The La Tuna Canyon Fire

By ALEX SHUTZ

Comment Letter No. 152
Attachment 152d

La Tuna Canyon is a peaceful little valley nestled between peaks of the high Verdugo Mountains which form the north side of the San Fernando Valley and separate it from the Sunland-Tujunga area of the City of Los Angeles. This valley is popular for its rural atmosphere providing country living within a highly urban community. The primary attraction is the panorama of beautiful trees and orchards lying next to lush brush-covered mountains rising on all sides.

Sunday, November 6, 1955, was a day of low humidity, high temperatures, and fairly strong winds; the sort of day not unheard of, but somewhat unusual for the month of November. The season's rainfall to date in Los Angeles was almost unmeasurable. Hot, dry days with occasional drying winds had created tinder-dry conditions which made one feel that brush would ignite if you so much as snapped your fingers.

Two small boys playing at being campers in their own back yard allowed their kindled campfire to get beyond their control. Very quickly the fire spread to the dry brush nearby. The boy's father attempted to extinguish the fire, but it was beyond his control. At 12:27 p.m., the first fire companies were enroute to a reported brush fire at 9645 La Tuna Canyon Road. It was several days later before these companies were back in quarters.

Until this time, there were many references made to the '38 brush fire in the Santa Monica Mountain area. Old-timers talked about a week or more of straight fire duty. They talked about many problems, of limited water supplies, of severe structural exposures, of wicked fire tricks. They talked about "mountain time," and of going without food and sleep for many hours. They implied, if not directly so stating, that this was the roughest, toughest, and the most unusual fire-fighting experience that a fireman could face. Rookies had little to argue such impressive tales--until 1955.

The La Tuna Canyon fire burned over an area of more than forty-five hundred acres. Two homes and two guest houses were lost, along with several out-buildings, automobiles, trailers, fences and miscellaneous improvements. The fire cost the City of Los Angeles several thousand dollars in extraordinary operating expense. It cost citizens much more than this in property damage and loss of valuable water shed. There is a good chance that winter rains, already starting, may increase the loss through flood damage. Already, plans for flood protection in this area call for expenditures of one hundred thousand dollars. But, property damage as high as it was, is infinitesimal--for a fireman's life was lost!

APPARATUS AND EQUIPMENT

The initial report of the first-in fire company was that a major brush fire was in progress already involving about twenty acres. A second-alarm assignment was requested and very soon the greatest movement of apparatus and equipment in the history of the Los Angeles Fire Department was under way. Twenty-two calls for additional equipment were made. These ranged from a single unit to six engine companies.

Apparatus was called for and responded as quickly as the need became apparent. Thirty different engine companies, more than one-third of the total L.A.F.D., worked on the fire. Thirty-eight engine companies were involved in move-ups, all but ten of which eventually moved to the fire. Fifteen Tank Wagons, all those in service except three left in strategic locations; nine Booster Tanks, all those in service except one in the Harbor area; ten Patrol rigs; one lone Truck Company; and many miscellaneous apparatus and vehicles responded to the fire. All told, more than one hundred twenty fire department vehicles were operating at the scene of the fire. Almost everything got into the act, possible the only types of apparatus not represented were the Foamites, Water Towers, and Fire Boats.

To gain some appreciation of the potential fire fighting striking force in the wide area of operation, consider these figures:

Water capacity of booster tanks:

- 30 Engine Companies ----- 9,280 gallons
- 15 Tank Wagons -----10,700 gallons
- 9 Booster Tanks ----- 3,600 gallons

- Total Capacity -----24,380 gallons

How much water was used on the fire?

Your guess is as good as anyone's. It was plenty, yet not enough to make the job easy. This could be a good problem in hydraulics, if enough factors were known.

Bear in mind that these are all L.A.F.D. equipment. L.A. County worked with nine of their companies and other equipment; the Forestry Service with six units. Both were of inestimable value in helping control this fire.

MANPOWER

Exhibit C 1

The first department-wide recall of the off-duty platoon since 1943, during World War II, brought on duty almost the total manpower of the department. Almost every member of the Los Angeles Fire Department was involved in this fire in one way or another. He may have been on the fire lines; transporting men, equipment, or supplies; or fighting fires in other parts of the City. The best estimate of number of men on the fire lines at any one time is four hundred.

Many times firemen found themselves in strange surroundings, working at strange jobs.

A veteran Salvageman suddenly found himself involved in the operation of a pumper in a relay operation;
a Truckman pulled more hose than he believed existed;
a Boatman shoveled madly.

Everybody doing a terrific job and giving credit to everyone else. Even "Hillmen" complimenting "Flat-landers"--and vice versa.

The recall of the off-duty platoon was probably the greatest single factor in the control of the fire. It not only provided reliefs for men on the fire line, but permitted the manning of relief apparatus for active duty to fill vacated engine houses. In at least one instance, this additional manpower was used to good advantage. It eliminated the need for calling for help to handle a king-sized water sweep, the result of a ruptured main in a large department store.

COMMUNICATIONS

The Signal Office was a busy place throughout the fire. Dispatching and routing so much equipment, and knowing at all times the location of the equipment, was a mammoth problem of communications. Besides dispatching to the big fire, assignments had to be made to other fires, since by no means was there a "fire holiday" in appreciation of the big one. Business calls through the Signal Office were also necessarily considerably more than normal.

Some variations from normal operations had to be made to handle this unusual situation. For example, some Engine Companies equipped with two triple combination apparatus were split and ran as two separate engine companies. Relief apparatus were pressed into service so that even though thirty engine companies were in on the fire, only thirteen engine houses were vacant, and most of these were in areas where coverage could be made quickly.

One of the big differences between this fire and the one of 1938 was the increased and more accurate communications facilities, particularly radio. Most of the apparatus in on the fire were radio equipped. In addition, twenty-eight "handie-talkies" were in service, some of which were brand new from a shipment just received and quickly unpacked for service.

Although a second radio frequency is licensed for fire department use, the system as yet has not been completely installed due to lack of necessary equipment. However, this second frequency was used to great advantage by Radio Service technicians in checking coverage and coordinating repair services without interfering with the heavy air traffic on the existing frequency.

A communications center was established at Base Camp, from which all Signal Offices could be contacted by radio. Although the Base Camp was not located in the best area for radio reception, effective radio communications were maintained at all times with occasional relaying of messages either from unit to unit, or with the help of the Signal Office always ready to complete contacts over dead spots.

The transmission and receiving of radio messages at the Base Camp were by means of "Junior's Casket." This portable emergency unit got its name from the fact that, when closed and ready for transporting, it looks like a small gray casket. Although this unit has been available for emergencies for some time, this is the first time that it has been used at a major fire. The set is a basic mobile unit stepped up to sixty watts, giving it about twice the power of the conventional mobile unit. It can be operated from an A.C. power supply, a three and one-half K.W. portable generator, or storage batteries. Added reception quality was obtained from an antenna thirty feet high.

Radio Service used its station wagon service car equipped with complete radio repair facilities and supply of spare parts. Servicemen were kept busy correcting breakdowns of equipment which was to be expected with apparatus in continuous operation over rough terrain. Many of the difficulties were traced to loose connections due to excessive vibration.

SUPPLY AND MAINTENANCE

Supplying food at a fire of this magnitude and duration presents a problem of planning and timing. Getting a hot palatable meal to hard-working firemen on time and in adequate amounts is hard enough under normal conditions, can you imagine the difficulties under the stress of this critical brush fire?

Supply and Maintenance, charged with the responsibility of arranging for and delivering an adequate food supply, did a terrific job under adverse conditions. Over two thousand hot meals, more than one thousand sandwiches, and hundreds of dozens of doughnuts and sweet rolls were served to hungry fire fighters. Apples, cakes, cookies, vegetables, salads, and many, many cartons of cold milk were available and consumed. How much coffee? It may have been enough to put out the fire if it could have been delivered to the right place at the right time.

Exhibit C 1

The food bill came to \$5,746.70, much more than the department is budgeted for this purpose. As a matter of fact, this sum amounts to about a five year allotment. Thus, emergency funds must be appropriated by the City Council to satisfy the bill collectors.

Less mechanical troubles developed than was anticipated in an operation involving more than a hundred vehicles in rough usage. Only three major mechanical breakdowns required apparatus to go off-duty for an extended period of time. These involved a Tank Wagon with clutch trouble, a Triple Wagon with clutch trouble, a Triple with transmission trouble, and a tractor with a damaged tread.

Several apparatus were damaged by fire, most of which involved minor damage to paint. However, a Hose Wagon was severely damaged and a Buick sedan was almost a complete loss when caught in a sweeping fire running over the Green Verdugo fire road near the junction of the Sherman Grove fire road.

Department mechanics were kept busy with minor mechanical troubles such as replacing radiator hoses, making carburetor adjustments, and correcting electrical system difficulties. Less trouble developed from battery failures than was reasonable to expect with apparatus running steadily and lights and radios in almost continuous use. Six to twelve batteries were either being charged by portable charging units, or in transit to apparatus to prevent delaying shutdowns. The dual battery set-up on later model apparatus proved very helpful in reducing shutdowns due to discharged batteries.

Very little pump trouble developed, and those that did were not serious. Careful and complete routine maintenance by operators is undoubtedly an important factor in the efficiency and reliability of apparatus under extended and rough operating conditions.

Damage to hose through bursting and loss due to fire was relatively minor considering the hazards and strenuous use to which the hose was subjected. The Storeroom delivered 5,000 feet of one and one-half inch hose to the fire to augment that carried by the various companies. The Hose Carriers also provided hose sorely needed at critical points. Hose and equipment was quickly supplied to fully equip seven relief triple combination apparatus for active service. Three of these triples responded to the fire.

INJURIES

Many injuries were suffered by firemen. Unfortunately, the life of Auto-fireman James Catlow was taken when he and other firemen were caught in a wicked trick of the fire sweeping over Green Verdugo fire road. Witnesses say that the action of the fire at this point was in effect a fire storm. About one hundred firemen reported injuries to the Receiving Hospital, about half of which were recommended off-duty. For the most part, firemen were treated for foreign bodies in the eyes, but injuries also included minor scratches, burns and poison oak infection.

Help from other agencies was outstanding. Police work in traffic control was a masterful job which permitted the movement of fire apparatus without undue interference. The Red Cross established evacuation centers at schools and churches to help the many people who were forced to leave their homes for their own safety. The Board of Education was most helpful in making available their facilities for a fire department base of operations. Public utilities, especially the Department of Water and Power were always available and ready to handle any problem that arose in connection with their installations.

This was a big fire--it was a terrible fire--it was an educational fire. Every fire department employee was involved in some way whether actually on the fire lines, or in the background planning and coordinating the many phases of such a large scale operation. Without the close cooperation and earnest effort from every sub-division of the department, the results could have been even more serious. This was a fire where every man had a chance to display initiative--the initiative that saved many a home when the odds were in favor of its burning. This was a fire experience that will be talked about for a long, long time. Here firemen proved themselves, and others were made. This is the Los Angeles Fire Department.

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News Release

U.S. Department of the Interior
U.S. Geological Survey

Release
Oct. 30, 2003

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USGS Research Indicates Fire Suppression and Fuel Buildup are Not Responsible for Shrubland Fires in Southern California

With the loss of life and property being experienced in the fires that have burned out of control in four Southern California counties, research by the U.S. Geological Survey on fire in the region reveals that to effectively manage fires to help prevent loss of life and property in Southern California shrublands, it is essential to understand the natural role of fire in chaparral ecosystems.

Large, high-intensity fires sweep the landscape in this region each year, threatening lives and homes, as is occurring with such devastation in this area. Ecologists have long known that chaparral ecosystems burn extensively and often, and that much of the dominant vegetation in these systems is highly adapted to a fire-prone environment. Many native plants here have seeds that require fire to germinate, or need the kind of disturbed habitat fires leave behind to grow. It was long thought that fire suppression played the same role in chaparral shrublands as it has in forests, creating a build-up of fuels that can eventually lead to more destructive fires.

"Past fire suppression is not to blame for causing large shrubland wildfires, nor has it proven effective in halting them," said Dr. Jon Keeley, a USGS fire researcher who studies both southern California shrublands and Sierra Nevada forests. "Under Santa Ana conditions, fires carry through all chaparral regardless of age class. Therefore, prescribed burning programs over large areas to remove old stands and maintain young growth as bands of firebreaks resistant to ignition are futile at stopping these wildfires."

In recent studies Keeley and his colleague, C. J. Fotheringham of the University of California, Los Angeles, analyzed historical records for counties dominated by shrublands subject to periodic high-intensity wildfires, from Monterey County in the north to San Diego County in the south. They found that although fire suppression is critical to protect homes, buildings and other structures, fire suppression does not prevent large wildland fires in southern California shrublands because these fires usually occur with powerful Santa Ana winds that blow at high speeds from the desert to the coast. In the present fire, hot Santa Ana winds of over 60 mph greatly increased the intensity and the movement of the fire. These winds occur each autumn, at the time when natural fuels are driest.

A close analysis of state fire records reveals the real story, said Keeley. Since 1910, chaparral fires have become more frequent as the human population has grown but fire size has not increased. The researchers found that large, intense fires were equally common in the years before widespread fire suppression as today, and do not appear to be the result of fuels build-up. In this highly fire-prone ecosystem, suppression efforts appear not to have greatly altered patterns of fire incidence. Keeley notes that the greater financial cost of fires today is most likely the result of constant urban expansion into areas subject to frequent burning.

For example, written documents reveal that during the 19th century human settlement of southern California altered the fire regime of coastal California by increasing the fire frequency. This was an era of very limited fire suppression, and yet like today, large crown fires covering tens of thousands of acres were not uncommon. One of the largest fires in Los Angeles County (60,000 acres) occurred in 1878, and the largest fire in Orange County's history, in 1889, was over half a million acres.

CANYON HILLS DESIR

Exhibit C2

The main ignition source of chaparral wildfires under natural conditions is lightning, but lightning-ignited fires are of an order of magnitude fewer in coastal ranges than in interior ranges of California and much of the western United States, said Keeley. Keeley hypothesized that before the arrival of humans, the majority of area burned occurred at overlaps of summer and autumn weather events. Small lightning-ignited fires of summer occasionally persisted until the arrival of autumn Santa Ana conditions. Such fires then rapidly increased in size and might continue to burn until winter rains finally doused them.

Note

Most fires in California shrublands are human-caused, and the beginnings of human influence on the natural fire regime date to pre-Columbian peoples, who used fire to convert the dense shrubland to a more open mosaic of shrubland and grassland, long before the arrival of Euro-Americans, said Keeley.

Fotheringham and Keeley noted that that throughout much of the shrubland landscape humans play a dominant role in promoting fires beyond what was likely the natural fire cycle. Future fire management, they said, needs to take a strategic approach to prefire fuel manipulations and move beyond evaluating effectiveness strictly in terms of area treated. Fire management should consider designing strategies tailored to different regions, as there are marked differences between the central coastal region and southern California in source of ignition, season of burning, and historical patterns of population growth and burning.

In terms of management implications, the fire researchers note that:

- The contemporary fire regime in these shrublands mirrors the natural crown fire regime far more than is generally accepted and that catastrophic crown fires may be an inevitable feature of this landscape.
- There may be little justification for using fire for resource benefit, since vast portions of shrubland landscape currently experience a higher-than-normal fire frequency.
- While landscapes managed by rotational prescription burning may contribute to easier containment of fires burning under moderate weather conditions, they are of limited value during severe weather such as the Santa Ana winds causing such destruction to life and property now.
- Limited and strategically placed prescription burns are the most cost-effective way to help prevent large catastrophic wildfires in southern California chaparral habitat.

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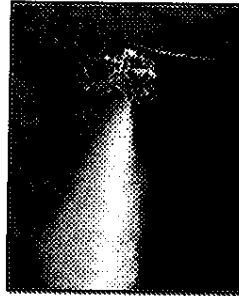
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Santa Ana winds whip up Southern California fires

October 22, 1996
Web posted at: 1:30 p.m. EDT

MALIBU, California (CNN) -- Wildfires continued to burn out of control in Southern California Tuesday, stirred by the first of the seasonal Santa Ana winds whipping over mountain passes from the Western deserts.

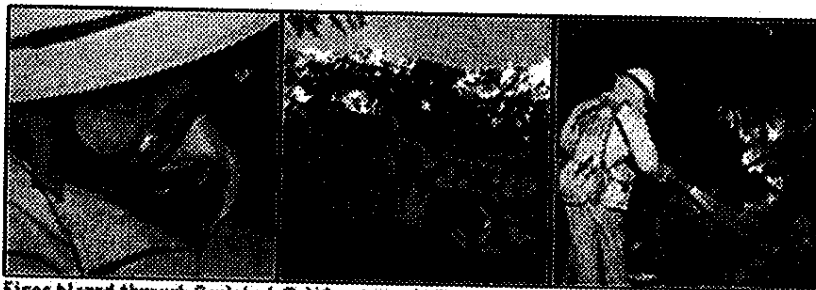


The helicopters drop 2,500 gallons of water each time they release a load. (CNN)

Since Monday, at least four fires have destroyed more than 80 homes, forced thousands to evacuate, and scorched more than 20,000 acres of brush land. Two fires -- one in the northern San Diego County suburb Carlsbad and the other threatening celebrity-laden Malibu in Los Angeles County -- burned out of control Tuesday.

In this story:

- Malibu threatened
- Schools evacuated
- Annual hazard
- Related stories and sites



Fires blazed through Carlsbad, California early Tuesday morning

(CNN)

Officials in Carlsbad called in a platoon of Marines from Camp Pendleton to battle the blaze in the posh seaside community where some 60 homes were destroyed by a fire fueled by oily eucalyptus trees.



"We're writing off the houses that are already on fire and

CANYON HILLS
DEIR

Exhibit D,

getting to the ones we can save," said Fire Battalion Chief Sonny Hilliard in Carlsbad. "We're overwhelmed. Most of the area has already been evacuated."

Comment Letter No. 152
Attachment 152f

Officials allowed some Carlsbad residents to return to their homes Tuesday, but issued a new evacuation order for San Marcos, a retirement community just east of Carlsbad.

Carlsbad's city dump was also ablaze Tuesday morning, drawing some manpower away from the city's residential areas. Carlsbad was the site of the worst fire-related injury so far, a man hospitalized with burns over 45 percent of his body and a firefighter who suffered a broken neck when his firetruck collided with another vehicle.

Malibu threatened

Near Malibu, some 2,500 firefighters worked overnight to prevent a repeat of 1993's Santa Ana season, when wildfires that began in brush surrounding the city swept through residential areas dotted with homes of the rich and famous. More than 260 structures were destroyed.

"We've been very fortunate this time so far," said Sarah Maurice, a spokeswoman for the city, noting that the Santa Ana winds had not been as strong as usual. "I believe we've only lost three structures, and that's 265 less than we lost in 1993."

The flames threatened nearby Pepperdine University, Maurice said, but firefighters prevented the blaze from reaching the campus.



Firefighters enjoyed an early morning breakfast after fighting fire all night
(Courtesy KTLA)

Some sections of Malibu have been evacuated, she added, including an emergency center set up for evacuees, but so far the fires have not seriously threatened residential areas.

Schools evacuated

On Monday, thousands of children in area schools were evacuated, including A.E. Wright Middle School in nearby Calabasas, where flames crept to within 200 feet of the building.

"It was pretty sooty and you could see the flames as the kids were getting on the bus," said sixth grade science teacher Joe Major.

The Malibu/Calabasas fire had consumed more than 12,000 acres early Tuesday, and firefighters were waiting for

CANYON HILLS
D E R

Exhibit D,

daybreak to resume more intensive firefighting efforts.

Comment Letter No. 152
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Officials had not determined a cause of either the Carlsbad or Malibu fires.

A separate fire in the exclusive Lemon Heights section of Orange County destroyed or damaged 29 homes Monday. The blaze was sparked when a wind-toppled tree snapped power lines. The fire, which covered a 2-square mile area, was controlled four hours after it began.



Pepperdine University students were evacuated Monday night (CNN)

A fourth fire, started in a refuse pile, destroyed one home and destroyed or damaged several other structures while torching nearly 40 acres near Chino. Firefighters took nearly 12 hours to get the blaze under control.

Annual hazard

Santa Ana winds occur each fall in the western United States when dry desert winds, triggered by high pressure systems, push to the west and pick up speed as they squeeze through narrow mountain passes and canyons.

CNN's Valerie Voss Explains Santa Ana Winds



Desert winds come into Southern California

(12 sec./256K AIFF or WAV sound)

Warm and dry air conditions

(14 sec./320K AIFF or WAV sound)

Mountains cause acceleration of wind

(10 sec./224K AIFF or WAV sound)

Under dry conditions in Southern California, the winds fan autumn wildfires and create dangerous, volatile conditions. The region's last spate of such fires was in 1993, when 26 major fires killed four people and destroyed or damaged over 1,200 structure, causing nearly \$1 billion in damage.

In 1991, a raging wildfire in the Oakland hills killed 24 people, injured 148 and destroyed 3,000 houses and apartments.

CANYON 15265
DEIR

Exhibit D1

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- [Wildfires roar in southern California](#) - October 21, 1996
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- [Fire spreads in California national forest](#) - October 11, 1996
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CANYON HILLS DEIR

Exhibit D,