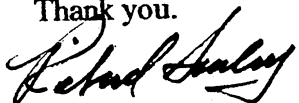


This DEIR is not only flawed in its concept, but, in many areas, inexact and, frankly, supercilious. This project is misconceived and is beneficial only to the developer! Your complete attention should be on its impact upon the community as a whole, not on the profit motive of an out of state corporation.

Thank you.



Richard Seeley
3924 El Caminito
La Crescenta, CA 91214-1026
(818) 248-1793

Eric Sorensen
13326 Borden Avenue
Sylmar, CA 93542
(818) 367-4486

December 19, 2003

Sent U.S. mail on Dec. 22, 2003

Los Angeles City Planning Department
Maya E. Zaitzevsky
200 North Spring Street, Room 763
Los Angeles, CA 90012

**RE: ENV-2002-2481-EIR;
SCH#2002091018
Canyon Hills Project -
DEIR Comments**

Dear Ms. Zaitzevsky:

My sister lives in Tujunga and I visit here frequently, and I lived in Tujunga for approximately 12 years. Although I no longer live in Tujunga, I frequently visit the area to spend recreational time hiking and cycling, and visiting my sister.

I have the following concerns after reading portions of the EIR:

Traffic -

The EIR states an additional 2,700 daily vehicle trips on La Tuna Canyon and surrounding streets; I think this number is understated, because the traffic counts that were conducted don't account for traffic that will occur on the weekends on La Tuna Canyon Blvd. at the recreational areas. It also fails to consider other sources of traffic, such as residence of the Canyon Hills Development taking their children to schools, and picking them up, service people, trash trucks driving to and from the Canyon Hills Development, etc.

The widening from one lane to two lanes from La Tuna Canyon to Foothill Blvd. are not adequately addressed in the EIR.

The bike lanes on La Tuna Canyon are not adequately addressed. Many cyclists use La Tuna Canyon.

I believe the increased traffic will decrease quality of life for the residents of Tujunga, Sunland, LaCresenta and LaCanada due to the increase in population.

Emergency access proposed from Area A -

Alene Drive and Hillhaven are too narrow to allow for the proposed 20-foot minimum. There is no proposal for a traffic light at Hillhaven and Foothill Blvd. to accommodate for the increase in traffic due to the residence of the Canyon Hills Development traveling to their homes using the emergency access road. Hillhaven is too steep to have heavy

truck traffic on. The increase in traffic on the emergency access road would, I believe, decrease the quality of life for the people living on the roads due to the higher volume of traffic and pollution. The EIR is inadequate in its failure to properly analyze the possible impacts on this emergency access road.

Trees -

Approximately 200 large trees will be cut down, and replaced with small trees. The new trees will be planted in entryways and common ways of properties. I don't believe this is adequate, because placing the trees in commons ways and entryways does not protect habitat. Protecting habitat would be to place the new trees in undisturbed areas., or not to cut so many trees down in the first place.

Zoning Changes -

I urge the City not to approve the zoning changes, and only allow the 87 houses to be built, because I think 280 would just have too much of a negative impact on this community.

I believe the cumulative impacts on the community will be huge. **I strongly recommend that you have the consultant redo the EIR and have the City re-release the EIR for additional comments when issues that haven't been adequately addressed are corrected. I believe the EIR is insufficient and should be redone because it seriously understates the impact of this development on the community.**

I very much hope you will consider my concerns. I am just very concerned because this development threatens the quality of life that this community knows. Thank you very much for taking the time to read my letter.

Sincerely,

Eric Sorensen

Maya E. Zaitzevsky
Los Angeles City Planning Department
200 North Spring Street, Room 763
Los Angeles, CA 90012

Re: CANYON HILLS PROJECT, EIR Case no: ENV-2002-2481-EIR and Reference Nos: SCH # 2002091018

I am writing to voice my opposition to the Whitebird Development Group's proposal to build 294 homes near the 210 freeway and La Tuna Canyon Road. This project is opposed by the Sierra Club and me for the following reasons.

Sincerely,

Philip Spradling, PhD
Altadena, CA

Preliminarily, I believe the EIR is inadequate and the consultant must redo the EIR and have the City of Los Angeles re-release the EIR for additional comments when the deficiencies are corrected. I believe the EIR is inadequate and should be redone because it seriously understates the impact of this development on the community.

This project--Canyon Hills--will have significant, negative impacts on schools, traffic, noise, air quality, visual quality, and recreation.

Last November, the Sierra Club took a formal position against the Canyon Hills Development. This development would impact our local Sierra Club members in the San Fernando, Crescenta Valley, and Verdugo Hills Groups. We value the rural areas of Sunland, Tujunga, La Tuna Canyon and surrounding communities. This development would very negatively impact that rural character.

*The Development threatens the quality of life we have come to know and love in our community.

*Profit from this development goes to out of state investors located in Nevada and Texas.

*Whitebird, the developer, is not legally entitled to do business in California or Los Angeles County.

*Worsen area traffic-EIR indicates an additional 2,700 daily vehicle trips on La Tuna Canyon and surrounding streets. The number of trips may be understated.

*5 years of Construction Noise including blasting from dynamite to build the roads and lots.

*An additional 15 years to build all the homes (20 years of total construction). (Oakmont IV, a smaller development, was finished in 1988. Even today homes are still being built on its vacant lots)

*Scarring from Grading visible from the 210 and La Tuna Canyon for about 20 years.

*Light Pollution from miles of new street light forever.

- *Elimination of areas and access to areas used by Equestrians, Hikers, and Mountain Bikers.
- *Grade ridgelines by as much as 80 feet and permanently alter 310 acres.
- *No guarantee that almost 700 acres in the Verdugo Mountains will be preserved from development because the developer does not own most of that land and is under no obligation to purchase or preserve it.
- *Grade about 125,000,000 Cubic Feet of land, filling canyons and cutting ridges for this project.
- *Increase air pollution and dust during and after construction.
- *Amend land use designations and zoning to allow for a greater density than is currently allowed. The property is currently designated for horse-keeping and livestock use.
- *Significant loss of at least a few hundred mature trees and other habitat replaced by small trees.
- *Loss of rare habitat and significant impact to other area plants and animals.
- *Substantially impact the rural nature of La Tuna Canyon and adjacent areas.
- *The EIR indicates a small impact on schools, but if each new house had 1 1/2 children of school age, it would add 420 children to our local area schools.
- *Substantial loss of life or property during a wildfire as the Northern portion of the development would effectively have only one way to escape the fire.
- *Numerous trash truck trips to haul out the estimated 5,000,000 lbs of trash generated during construction.
- *This development does not improve or help our community.

Philip V. Spradling, PhD, MSG
Educational Psychologist - Gerontologist
English Language Specialist (ESL)
University of Southern California Fuller Theological Seminary
Glendale College
California State University-Fullerton

Kyle Springer
9765 Tujunga Cyn. Blvd. Tujunga CA. 91042
818. 353.7935

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

Dear Ms. Zaitzevsky:

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

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

To begin with on page IV.J-3 and IV.J-4 under response distance and access The DEIR points out the fact that the project site is not within the Maximum allowable response distance per the LAFD FIRE CODE being that the project site is 2.8 miles from the closest Fire station. The project site is almost twice the Maximum allowable distance for the Closest Engine Company and 1/3 greater than the Maximum allowable distance for the Closest Truck Company. If there should ever happen to be a significant structure fire or other incident the closest Fire station #74 would quickly deploy its entire resources (1 engine company, 1 Truck company with a pumper, and 1 rescue ambulance). This leaves the rest of the city to be covered by Fire station #24 which is approximately 3.4 miles from Tujunga (well over twice the maximum allowable distance) Fire station #24 provides a single Engine Company and provides no paramedic service. The Third closest station #77 is approximately 4.25 miles from Tujunga (again well over two times the Maximum allowable response distance) Fire station #77 provides Paramedic service, but does not provide ambulance transport of patients. Another concern and factor regarding response times and distances is the possibility and probability that the second closest Fire station #24 and third closest Fire station #77 are either on another call in their own districts or were already dispatched to the first mentioned incident response with fire station #74. During this type of incident the rest of the city is unprotected and at best, eligible Fire Protection will be coming from as far away as Pacoima (Fire Station 98) Van Nuys (Fire Station 89) or North Hollywood (Fire Station 60). These Fire units will have incredibly long response times and distances, (again given only if they are available to respond and not already on a call in their

own districts). The DEIR acknowledges the fact that the Canyon Hills Project will **increase the likelihood and threat potential of fires** in this already **“Very High Fire Hazard Zone”** during temporary construction operations as well as the long term by introducing the new population to the area (page IV.J-5 and J-6). The DEIR mentions the developers intended mitigation measures for complying with the LAFD’s Fire Code for an area of residential development outside of the Maximum response distance. The developer intends to comply with LAMC Section 57.09.07 by providing automatic fire sprinkler systems to the project structures. This measure will in no way reduce response times or reduce the threat of a wild land fire. In speaking with several members of the LAFD’s Fire Suppression crew at Fire Station #74, I found that the members there by and large feel that Fire Protection and services in this area are already spread out thin and Fire Station Personnel feel extremely challenged to accommodate the citizens of Tujunga and surrounding areas. The DEIR also mentions there are currently no plans to increase or augment area Fire Stations or personnel numbers (page IV.J-1) Existing mutual aid agreements and back up support from the County of Los Angeles Fire Department is only during Wild land fires and **not structure fires or Emergency medical services.**

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

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

Taking all of the above mentioned into consideration, the single most significant under estimation of the DEIR as it relates to Public Services and Fire Protection, is the complete omission and lack of mention regarding Emergency Medical Service (EMS) provisions. Aside from the statement the DEIR does make in that the LAFD is the primary provider of Paramedic and ambulance service to 911 patients in the area. There is no mention of what impact this project (Canyon Hills) will have on the already challenged Emergency Medical Services for this area. As it stands currently the only ambulance serving Tujunga and the surrounding area is Rescue Ambulance #74 there is not another ambulance capable of patient transport anywhere near this area once Rescue #74 is in use and on a response. Please note that fire apparatus such as an Engine Company or Truck Company cannot transport a patient at any time. There are only two hospitals in the general Tujunga area that accept patients from LAFD Paramedics, the first being Pacifica Hospital in Sun Valley approximately 8 miles from Tujunga and Verdugo Hills Hospital in La

Canada approximately 5 miles from Tujunga(Verdugo Hills Hospital will frequently make itself closed to LAFD patients during times of heavy Emergency Room use such as FLU season, I was told it is not uncommon for Verdugo Hills Hospital to be closed to LAFD patient traffic). A third Hospital available for LAFD patients would be Providence Holly Cross located in Granada hills approximately 15 miles from Tujunga, (Holly Cross is the nearest Trauma Hospital and generally would only accept patients from the Tujunga area that meet the Trauma center criteria).

Understanding these factors it is quite easy to see how with just one patient being transported to the hospital by Rescue Ambulance #74 the entire remaining Tujunga area is without patient transport capabilities for extended periods of time. The typical turn around time for a Paramedic Ambulance in the LAFD is one hour. It is very easy to see that the LAFD is Already extremely challenged to provide patient care in this area without adding the estimated 831 residents the Canyon Hills project would add, (this number of residents is highly subjective and most likely inaccurately low).

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Springer". The signature is written in a cursive style with a large initial "K".

Kyle Springer

December 27, 2003

Ms. Maya E. Zaitzevsky, Project Coordinator
Department of City Planning
200 North Spring Street
Room 763
Los Angeles, CA 90012

Re: Canyon Hills Draft EIR
ENV-2002-2481-EIR
SCH #2002091018

Dear Ms. Zaitzevsky

These comments are submitted on behalf of Glendale-Crescenta V.O.I.C.E., Inc. (Volunteers Organized in Conserving the Environment), a grassroots organization of nearly 5,000 citizens residing in Glendale and the Crescenta Valley, as well as the Sunland, Tujunga, Sun Valley, and Shadow Hills communities of Los Angeles.

V.O.I.C.E. has retained two prominent experts who have reviewed the Draft EIR. Their comments are attached. This letter is not intended to be a summary of the enclosed comment letters. Each comment letter stands on its own and the City should respond in accordance with the dictates of the California Environmental Quality Act (CEQA). This letter sets forth numerous objections to the Draft EIR, focusing on its conceptual and legal inadequacies.

I. THE DRAFT EIR USES A GROSSLY MISLEADING AND IMPROPER PROJECT DESCRIPTION.

The site proposed for development is a hilly 887-acre parcel located "entirely within the Verdugo Mountains in the northeastern San Fernando Valley." (Canyon Hills Draft EIR at II-1). Presently the site has "moderate to high use" for wildlife activity (*id.* at IV.D-141) and "includes a number of large and small animal species including coyotes, mule deer, American badgers, bobcats, gray foxes, woodrats, raccoons, birds, lizards, and snakes." (*Id.* at II-4). Its California "Native vegetation communities include southern arroyo willow riparian, southern coast live oak-sycamore woodland, Venturan coast sage scrub, mixed chaparral, and chaparral-sage scrub ecotone." (*Id.* at IV.D-1).

The entire site is located within Los Angeles County Significant Ecological Area 40 (*id.* at IV.D-28) which means that it possesses biotic resources that are uncommon, rare, unique or absolutely critical to the maintenance of wildlife.

The Southern section of the property bounds the Santa Monica Mountains Conservancy's 1,100 acre La Tuna Canyon Park, used by hikers and nature lovers from all over Southern California. The project site is also just over a mile away from the State of California's Verdugo Mountains State Park, "set aside for the purpose of preserving and protecting a remnant of undeveloped land amidst the urban development of the city of Glendale and surrounding communities." (*Id.* at IV.J-24) The parcel presently experiences a high recreational use by the general public for hiking, mountain biking, nature study and the like. It is "located in a 'Very High Fire Hazard Severity Zone' (VHFHSZ)" (*id.* at IV.J-4) meaning the entire parcel is in an area identified by the Los Angeles City Fire Department as being "prone to wind-driven fires." (*Id.* at IV.J-4). The development area is also subject to "eight areas of potentially seismically-induced rock fall" (*Id.* at I-8).

According to the Draft EIR's "project description" section, a principal object of the proposed project is "to provide a substantial amount of high-quality housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley" (*Id.* at III-9). This will be accomplished by "(1) grading for building pad sites, access and other necessary improvements, (2) the construction of homes, storm drainage facilities, and access improvements, (3) the installation of utilities (e.g. water lines, fire hydrants, and sewers) (*Id.* at III-1).

Significantly, the Draft EIR's project description fails to include an informational element which – at least in this reviewer's experience – is normally found in the project description section of an adequately prepared EIR. In spite of the declared project objective, nowhere in the document is there an indication of the developer's intent – or lack thereof – to actually construct homes on the property. Generally, the project description of Draft EIRs include such phrases as "Residential units would either be constructed by the project applicant and/or other contractors." (Final EIR – Oakmont View Phase V, February 2002) or "no residential unit construction is proposed by the applicant" (Draft EIR – Mandeville Canyon Estates, July 1994). However, in the Canyon Hills Draft EIR, this information is conspicuously absent. Hence, the public and the decision-makers are left to wonder what the developer actually intends to do with the project.

However, at a meeting of the Sunland-Tujunga Neighborhood Council on November 12, 2003, the developer admitted that he has no intention of building the homes on the project site. Instead, he will develop and grade the property to produce improved lots, then turn the project over to others. In other words, the developer proposes to create another horrendous eye-sore of graded lots without homes, subject to the whims of the real estate market. A downturn in the economy could leave these empty lots sitting barren for years. So in essence, the project boils down to little more than an exercise in real estate speculation – the developer is proposing to risk a certain amount of capital to improve the

lots, but he is apparently not willing to take the further incremental risk of building the homes for which the lots are designed.

This situation is exacerbated by the fact that the developer is not even a local business entity. The address provided in the Draft EIR of “c/o 444 S. Flower Street, Suite 1300, Los Angeles, California 90071” (Canyon Hills Draft EIR at I-1) is not actually that of the developer, whose home office is in Las Vegas, Nevada. Instead, the address is that of Consensus Planning Group, the largest firm in the United States specializing in building “grassroots community support for real estate development, transportation and public facilities projects.” (Consensus Planning Group website – www.consensusp.com). In other words, the developer is so concerned about the public knowing his actual whereabouts that the Draft EIR is left to list as his address, a hired public relations firm.

So in the end, once the entitlements are granted and the reconstruction of a significant portion of the Verdugo Mountains is complete, the developer will apparently turn the project over to others, return to Nevada, and leave the negative impacts of the project for the community to deal with. The Draft EIR owes it to the decision-makers and the public to make the developer’s plans for the project completely clear.

A second project objective is to “minimize impacts to important natural landforms and significant natural resources. (*Id.* at III-10).

In this regard, the proposed project entails extensive grading, using “conventional cut and fill grading techniques” (*id.* at III-6) and “would involve a total earthwork quantity of approximately 4.6 million cubic yards (plus 20 percent for remedial grading).” (*Ibid.*) The developer’s claims of a site design sensitive to existing topography – inappropriately echoed in the Draft EIR (*id.* at I-20) – simply do not withstand even a modicum of reasonable analysis.

4,600,000 cubic yards of earth is a massive amount of earth movement. A standard 10-wheel dump truck commonly used for earth excavation holds, on average, 15 cubic yards. Thus it would take 306,667 truckloads to move this earth from one place to another on the project site. Since the average 10-wheel dump truck is approximately 25 feet long, placed bumper to bumper, the 306,667 truck loads would fully stretch 1,452 miles – approximately the distance from Los Angeles to Salt Lake City and back. Moreover, the developer has the audacity, again inappropriately echoed in the Draft EIR (*ibid.*), to claim that this amounts to a 75% reduction over previous proposals. The mind boggles at the thought of this project at one time actually requiring 18.4 million cubic yards of grading – enough to line up those dump trucks all the way from Los Angeles to Lima, Peru!

A third project objective is “to provide ample equestrian and other recreational amenities, as well as significant passive open space and landscaping areas.” (*Id.* at III-9). Accordingly, “The proposed project would also include an equestrian park on approximately three acres of land. . . which would be available for public use.” (*Id.* at III-4).

However, the Draft EIR is astonishingly lacking in details on the design and operation of this equestrian park. When one turns to the Recreation and Parks section of Draft EIR, one merely reads that "The proposed three-acre public equestrian park and trail would also be available to all residents." (*Id.* at IV.J-26). The design of the park is non-existent. As to the operation of the park, "It is anticipated that the City's Department of Recreation and Parks or a nonprofit organization would operate the equestrian park." (*Id.* at III-4). This is a notion that amounts to little more than wishful thinking at a time when cities and counties are contemplating giving up operation of their parks (*Glendale News Press* – December 19, 2003 – "Crescenta Valley Park faces closure"). Significantly, the only details we have about the equestrian park is that it will include a staging area, an arena, and parking for two cars and trailers!

Furthermore, the Recreation and Parks section of the Draft EIR indicates that "the proposed project would increase the local residential population by approximately 831 persons." (*Id.* at IV.J-25) and concludes that at the preferred parkland per population ratio of four acres per 1,000 persons, the project would require 3.3 acres of new parkland. It goes on to say that "Within the Development Areas, recreational facilities would include tot lots, an active play area, passive open space, hiking trails, a vista point with a picnic area and gazebo, and a swimming pool with a Jacuzzi, restroom building, and barbecues." (*Id.* at IV.J-26). Yet once again, one searches in vain for any specific location, size, or description of these recreation facilities. Moreover, the DEIR reaches the height of hypocrisy when it announces that "There are no available flat areas on the project site that would permit the development of a park with a wide range of active recreational facilities for children and youth." (*Id.* at IV.J-26). As we have previously seen, 4.6 million cubic yards of earth will be moved to make flat pads for homes, but not one ounce, apparently, will be moved for a park.

A fourth project objective of the proposed project is "To provide safe, efficient and aesthetically attractive streets in the residential development with convenient connections to adjoining arterial and freeways. . ." (*Id.* at III-9).

The question of the safety of this project is perhaps the most important issue that the City's decision-makers will deal with in considering this project. Sadly, the Draft EIR is woefully deficient in its analysis of this critical area. With regard to police protection, it is important to note that the Los Angeles Police Department's ideal emergency response time is 7.0 minutes. During 2002, the city-wide response average was 10.2 minutes. In the Foothill Division it was 11.4 minutes. The Foothill Division, however, is divided into three reporting districts, one of which is Sunland-Tujunga, the area where the proposed project is located. The Draft EIR was apparently unable to determine the response time in Sunland-Tujunga. However, Nina Royal, former Tujunga representative on the Foothill Police Advisory Board and its current co-chair, reports that the response time for Sunland-Tujunga is actually 14.7 minutes, more than twice as much as the L.A.P.D.'s goal. And this is without the proposed project. Sadly, the Draft EIR does not propose the one mitigation that would actually result in greater safety for Canyon Hills residents, an additional number of daily police patrols in the Sunland-Tujunga area of the Foothill Division.

The threat to the project's residents due to the lack of fire and paramedic services are of even greater concern. As previously mentioned, the entire project is within what the Los Angeles City Fire Department refers to as a Very High Fire Hazard Severity Zone (VHFHSZ), an area prone to wind-driven fires. The Draft EIR states that "Fire Station No. 74 is located approximately 2.8 miles north of the project site at 7777 Foothill Boulevard in Tujunga and should have primary response duties." (*Id.* at IV.J-1). Fire Station No. 74 is comprised of a truck and engine company with a paramedic ambulance and an Emergency Medical Treatment (EMT) rescue ambulance.

According to the Draft EIR, "The maximum response distance for residential land uses are 1.5 miles for an engine company and 2.0 miles for a truck company." (*Id.* at IV.J-4). In other words, Fire Station No. 74 exceeds these recommendations by 1.3 miles. This might be easily dismissed in a flatland area where an additional mile or so of response time would not be critical. But in a hilly area, prone to wind-driven fires, the increased time and distance could be disastrous.

Perhaps, more important than the description of Fire Station No. 74 being 2.8 miles north of the project, is a description of the route that fire engines or paramedic trucks would take in response to an emergency within the Canyon Hills development. There are three possible scenarios from Station No. 74:

- 1) From the west: Emergency vehicles would proceed westbound on Foothill Boulevard for approximately 1.5 miles until reaching Interstate 210. Vehicles would then proceed back eastbound for approximately 3.0 miles until reaching the La Tuna Canyon Road off ramp. Vehicles would then exit the freeway and proceed north into Development Area A or south onto La Tuna Canyon Road and proceed approximately .5 miles to Development Area B.
- 2) From the east: Emergency vehicles would proceed eastbound on Foothill Boulevard for approximately 1.5 miles to Tujunga Canyon Boulevard. Vehicles would then proceed southbound for approximately 1.0 miles to La Tuna Canyon Road. Vehicles would then proceed westbound for approximately 1.5 miles to the entrance to Development Area A, or 2.0 miles for Development Area B.
- 3) Emergency Access Route: Emergency vehicles would proceed eastbound on Foothill Boulevard for approximately .75 miles. Vehicles would then proceed northbound on Hillhaven Drive for approximately .5 miles through narrow, winding, uphill residential streets to the proposed access gate on either Inspiration Way or Verdugo Crestline Drive. There, firefighters would stop, get out of their vehicles and unlock the closed emergency access gate, before proceeding into the proposed project.

Whether measured "as the crow flies" or by the routes required to deal with an emergency situation, the response distances to the Canyon Hills project are a recipe for disaster. Astonishingly, the mitigation measure that supposedly reduces the impacts to