

Los Angeles City Planning Dept.  
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Los Angeles, Ca. 90012

**RECEIVED**  
CITY OF LOS ANGELES  
DEC 22 2003  
ENVIRONMENTAL  
UNIT

Re: CANYON HILLS PROJECT – DEIR Comments  
ENV – 2002 – 2481- EIR; SCH #2002091018

Dear Ms. Zaitzevsky

This letter is a prefix to my comment so that I (also speaking for my wife, Marva) can explain my perception that the "PROJECT" as proposed by Whitebird will unacceptably exacerbate the risk of great losses in the event of a Santa Ana wind driven brush fire.

We have reached our seventies with some difficulty and lived at our present address on the very edge of Tujunga with nothing but brush and tree covered Verdugo Hills, LaTuna Canyon and the 210 Freeway between us and Burbank for 46 years. We have observed first hand at least four major brush fires; some destroying structures. I witnessed two that started from contacting power lines.

Previous fire storms, including last October's multiple conflagrations, show that even the best equipped, trained and motivated single fire crew (as is Engine Company # 74) can not stop one of these fires – and what we have in Sunland-Tujunga is just one single fire crew.

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Fire Station #74 was installed on Foothill Blvd. In the early 1950's. Since then hundreds of homes have been built in Tujunga, mostly into the hills and often closely clustered.

As you are aware, the "PROJECT" is to be located in a "Very High Fire Hazard Severity Zone." Instead of just repeating that compliance will be in accordance with existing fire codes and regulations, in light of the October disasters and various politicians calling for a review of the way we develop these VHFHS Zones, why does the LAFD not come out positively against any variances to the existing General Plan for the site and the City's slope density ordinance? In other words, why wouldn't the Fire Dept. insist that only Alternative D is acceptable.

In fact, my own personal experience with LAFD is that they are unwilling to enforce compliance with the LAFD's 100 foot brush clearance and 200 foot fuel modification from structure regulations when they affect adjacent undeveloped property. If the "PROJECT" were allowed to proceed, there would initially be hundreds of undeveloped adjacent properties and many even when the "PROJECT" is completed (est. 10 to 15 yrs.) I have been trying to get the city to enforce those rules on the hillside (that I do not own) next to my home since the regulations were first issued. Perhaps the greatest concern is that with only a few initial responding units the well spaced homes in the older sections, such as Estepa Drive and Tranquil Drive and Place, will be ignored in favor of the new closely grouped, larger and more expensive homes in the "PROJECT". There is

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precedent for this fear. Some years ago the Glendale and LAFD did just that with the arson started fire adjacent to the 2 freeway. Houses were lost near the area of origin while the fire engines scooted eastward. There was much negative press on this for a time, and some similar rising out of the 2003 fires. Further substantiating this concern is the brush and forest fire chapter in the FIRE PROTECTION HANDBOOK. (My copy of this authoritative text is the fourteenth edition.) It states in section 5 of chapter 12 under fire control operations "Frequently, when insufficient forces are available at the early stages of a fire, the decision must be made to abandon certain areas in order to prepare a more efficient stand further back." Why allow a variance that will make this more likely to happen.

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The developers state in several places that "homeowner's associations "will take care of this and that including some brush maintenance. Again, personal experience ( with my son's property) indicates there is no certainty and little recourse in this.

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My education and profession was in aircraft engineering, which has nothing to do with brush fires. I will remark though, that one of my specialties was aircraft fire protection and I was responsible for fire protection and extinguishment for the Lockheed L1011 TriStar passenger aircraft, among other things

Thank you for considering my specific comments to the DEIR which follow.

Sincerely yours,

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*Marva M. Grove*

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*Dec 17, 2003*

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**DEIR COMMENTS from: WILLIAM C. & MARVA M. GROVE**

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

The following Comments address the fire protection implications of the DEIR, particularly section IV.J.1, Fire Protection, under IV Environmental Impact Analysis, J Public Services.

As residents of this VHFHSZ for 46 years and being exposed to brush-not on our property- on two sides, we have observed some local brush fires and followed others on the TV and newsprint with great interest. Therefore, relying on that experience we offer the following comments on the DEIR pertaining to fire protection.

**IV.G LAND USE DESIGNATION**

- A. The section on Land Use Designation states in part – “In addition, the Chief Engineer of the Fire Department is required to report that adequate fire Protection exists or is in the process of being provided. (see Section IV.J.1)”

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One nearby fire station might be adequate for one house fire with fireproof roof and inside sprinklers. Two or three might be adequate to protect a few houses with required brush and tree clearance in a light wind. October’s fires and previous Verdugo Hills brush fires have shown that dozens of fire engines protecting hundreds of houses in a fire storm are inadequate. Since such fire storms occur with some frequency and some times at night with strong winds and no air cover, the Chief Engineer of the Fire Dept. can not and should not report that “adequate fire protection exists or is being provided.” After the October conflagrations, various people have called for review of the way we develop the hills. The EIR should be shelved (except possibly for Alternative D) until such reviews take place.

**IV.J FIRE STATIONS**

The DEIR does not tell us how many more homes in Sunland-Tujunga VHFHSZ have been built since Fire Station #74 was installed on Foothill Blvd, in the early 1950’s. Fifty years and no additional S-T fire stations – but a lot more houses - argue against further zone changes. The other two stations mentioned in the DEIR and any others are, of course, even more remote.

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**IV.J FIRE HAZARDS**

The Los Angeles Fire Department Brush Clearance program is mentioned in footnote 10 on page IV-J-4, but not explained. The requirements in the program are specific regarding 10 feet, 100 feet and 200 feet clearance and fuel modification zones, but they State “you are only required to clear only on your own property.” From the map each lot

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will be adjacent, at least on one side, to undeveloped land. On Estepa Drive, at least, we have found the LAFD can not be relied upon to force clearance on the absentee owner, therefore the hazard may be greater than perceived depending on each lot's configuration. This would be especially true before all the lots are developed. See also comment to recommended Mitigation Measure J-1-18.

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**IV.J ENVIRONMENTAL IMPACTS**

**A. Short - Term Construction Impacts**

Construction activities often start brush fires and In a VHFHSZ on a dry, Santa Ana wind day, the local LAFD is not equipped and prepared to deal with such fires three to five miles from the fire station. Therefore there should be no construction activity on such days.

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**IV.J LONG TERM OPERATIONAL IMPACTS**

The DEIR indicates two water tanks will be installed. The DEIR locates one 1.5 million gallon tank adjacent to the existing one on Estepa Drive (my street) but gives no Impact Information on Estepa Drive. More water is good. The impact details should be listed specifically, since this is outside the "Project".

38-8

What is it's effect on adjacent property? Will Estepa Drive be open during construction? Will Estepa Drive, which is in poor condition, support the heavy equipment traffic? Will water flow be interrupted to Estepa residents? Does the Project own this site or access? How will residents be protected from water tank rupture? Will higher street berms affect Access to driveways?

The other 1.5 million gallon tank is to be located in the northern portion of the development at 1900 feet. This means it may be atop one of the protected ridges. The location and visual impacts should be addressed.

38-9

Page IV.L.3 of the DEIR states water from the "new" Estepa Drive tank "would be delivered to Development A via a new water main constructed within the Inspiration Way public right-of-way" and "to supply the two new water tanks the existing 16-inch water main located within the LaTuna Canyon Road would be extended approximately 5,000 feet to the impact site." It is confusing which way water is flowing to the project. If they are getting water from LaTuna Canyon, why from Estepa Drive via Inspiration Way? A revised DEIR is needed to better explain water flows and head for comment. The impacts on Inspiration Way residents and services need to be presented in a revised DEIR for comment.

38-10

**IV.J LONG TERM OPERATIONAL IMPACTS  
RESPONSE DISTANCE AND ACCESS**

The DEIR states that Station # 74 is 2.8 miles from the intersection of the 210 freeway and LaTuna Canyon Road. What it does not say is that the distance from Station # 74 to

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the farthest house is 4.7 miles and about 4.0 miles to more than half of the home sites. (by scaling figure 111-2) Impacts with respect to distance criteria are indeed significant. The required maximum of 2.0 miles is not mitigated by sprinkler systems in the homes when the EMT, the rescue ambulance is needed.

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**IV.J FIRE PROTECTION**

**LONG - TERM IMPACTS  
EMERGENCY ACCESS / EVALUATION**

On page IV.J-8, second paragraph, it is stated "The potential funneling of evacuating traffic from Development Area A to a single access point could result in congestion and possible conflicts with entering emergency vehicles." HOW TRUE! This statement also applies to Hillhaven Street, which is the traditional route for emergency vehicles to homes in Enfolding Hills, ie, Amoret and Estepa Drive into Crystal View Estates and of course the egress for those places. The proposed alternates of Verdugo Crestline Drive or Inspiration Way each join up with Hillhaven and would thus impede emergency access to/from Estepa Drive, et al. Add this to the inadequacy of the two candidates and it is obvious neither is acceptable, hence the whole project DEIR must be rejected.

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**IV.J FIRE PROTECTION**

**LONG - TERM IMPACTS  
FIRE HAZARDS**

These last two sentences on page IV.J-8 are puzzling. "Also, the LAFD has received preliminary plans for the proposed project and would again review the plans prior to approval of the vesting tract map. This would ensure that adequate fire protection facilities would be provided, particularly in light of the project site's location within a VHFHSZ, and that new or expanded fire protection facilities would not be necessary." It seems the developer has anticipated the LAFD's approval before the review has taken place. After the October fires and various fire officials post-fire admissions that they lacked resources and politicians and other officials recommending a review of hillside and forest land development practices, how could the LAFD be expected to bless this project. The project would put homes now existing at risk by draining resources. The FIRE PROTECTION HANDBOOK, Fourteenth Edition, by National Fire Protection Association, in chapter 12, section 5 titled "Forest, Brush & Grass Fires" under "Fire Control Operations" advises "Frequently, when insufficient forces are available at the early stages of a fire, the decision must be made to abandon certain areas in order to prepare a more efficient stand further back.....". This is what the fire fighters did in the arson fire started at the 2 Freeway, giving up many homes.

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**IV.J FIRE PROTECTION**

**LONG TERM IMPACTS  
LAFD REVIEW**

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Based on the preceding cumulative comments, the following statement, "proposed project's operational - related impacts to fire protection and emergency services would be less than significant," is not valid.

**MITIGATION MEASURES J.1-3 Through J.1-16**

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It was indicated in the prior hearings on the DUKE DEIR that recommended mitigation measures are not mandatory. These should be labeled mandatory in the next revised DEIR. It is not clear if J.1-3 through J.1-16 apply to emergency egress road or to just the road within the project. This should be clarified.

**MITIGATION MEASURE J.1-18**

38-16

Homeowners associations were also mentioned in section III as performing fuel modification and in J.1-18 clearing or thinning the brush in adjacent areas under the Supervision of the LAFD. This invites the following questions:

- Where are these associations defined?
- Who sets them up and pays for them?
- Are they in play before any homes are developed through perpetuity?
- Who takes care of the adjacent property if there is no homeowner's association? After all this is just a recommended mitigation.
- What guarantee is there that the LAFD will supervise brush clearing on adjacent property.

Experience on Estepa Drive and in Saugus suggests mitigation J.1-18 will not materialize.

**LEVEL OF SIGNIFICANCE AFTER MITIGATION**

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Implementation of the so called mitigation measurers will have little impact on a Santa Ana condition fire storm. The impact of this development on fire protection has the potential to be disastrous.

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 Dec 17 2003