



Mt. Charleston Fire District

4650 Kyle Canyon Rd, Mt. Charleston, NV 89124
Station Phone: 702-872-5483

Jorge Gonzalez
Fire Chief

September 26, 2018

Mr. Donn Christiansen, Area Manager
Spring Mountain National Recreation Area
701 N. Torrey Pines Drive
Las Vegas, NV. 89130

Re: Draft Environmental Impact Statement
Lee Canyon Ski Area Master Development Plan Phase I

The Mount Charleston Fire District (MCFPD) appreciates the opportunity to submit comments related to the above referenced action. Although our comments are not directly related to the Environmental Impact Statement, we request them to be considered in all future actions related to the proposed expansion of the Lee Canyon ski area.

The Mount Charleston Fire District currently provides service to the ski area and will continue after the expansion occurs. During the winter season, December through April, the majority of calls for service received by MCFPD are directly related to the Lee Canyon Ski Resort. For example, in the period from December 01, 2016 thru April 02, 2017, 62% of all emergency calls were Ski Resort related. MCFPD is concerned that the planned update and expansion of the existing facility, as well as the addition of new summer activities, will exponentially increase the number of emergency calls and negatively impact public safety for both the residents and visitors.

We look forward to working with the operator and the Forest Service to ensure the larger volume of visitors to the facility have proper emergency service protection while also continuing to provide our existing level of service to the residents and other recreational visitors to Mount Charleston and the Spring Mountains.

The MCFPD requests to be included in the coordination of the following items.

Reference to Chapter 1

Safety:

Issue#2 The MCFPD does not have the staffing or equipment to be able to dedicate an ambulance or ambulance service full time to the ski resort to facilitate patient transportation from facility to hospital. Depending upon private ambulance company availability and staffing levels, one unit may be staged on the mountain during heavy holiday, snow and visitor days. However this unit is coordinated and dispatched to any Mt. Charleston Fire Protection District medical emergencies and is not contracted by the ski resort.

The current volume of calls and responses to the ski resort is already a burden on the limited resources of the Mt. Charleston Fire Protection District. Rescue units spend several hours a day responding, assuming patient care and transporting patients to next level of care via ground or air on any given weekend.

Currently, Air Operations are not reliable during the winter season and severely limited during the other seasons due to altitude, air temperature, patients and crew weight concerns. The USFS EIS anticipates no impact on



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traffic flow on SR 156 with the increased number of customers at the ski resort. To believe that increased traffic volume won't adversely affect traffic flow is illogical. Additional visitors to the Ski Resort will undoubtedly result in increased traffic and congestion which will adversely affect the speed of ground transport from the ski area to landing zones in lower Lee Canyon.

Traffic:

Issue 1-Traffic Congestion is an on-going problem on SR156 due to the ever increasing number of visitors to the area and has been exacerbated in recent years by road closures, construction projects, road congestion, slow traffic and delays. During holidays, snow storms or high visitor volume days, the Mt. Charleston Fire Protection District units and ambulance companies experience delays when responding to the Ski Resort and other recreational and residential areas. These delays can be as long as 1 hr. and sometimes crews are unable to safely navigate or respond to any emergency in the upper areas of SR 156, including the Ski Resort.

The plan to increase parking and facilities will only increase visitor and traffic volume. Any evacuations of the ski resort, recreational and residential areas in Lee Canyon in the event of a natural disaster could be a major hazard to visitors, residents and first responders. With Lee Canyon being a box canyon that is only served by a single, 2 lane roads, and the additional volume of visitors will increase the potential for traffic issues during this type of emergency.

Reference to Chapter 2

Issue 2 - The MCFPD does not provide a dedicated ambulance service to the ski resort. Depending upon private ambulance company availability and staffing levels, one unit may be staged on the mountain during heavy holiday, snow and visitor days. This ambulance is dispatched for all MCFPD emergencies, not solely for the Ski Resort. Historically the ambulance has been provided at no cost to the District and subject to availability. There are no guarantees that it will be provided in the future at no cost. MCFPD services are already taxed with responses to the ski resort.

Reference to Chapter 3

3.10.1 Scope of analysis

Issue 2 the quote "may affect provision of emergency services" The current visitor volume already affects emergency service levels and responses within the Fire District.

3.10.2.2 Emergency Services

Paragraph 1

Lee Canyon Ski Resort staff does not have Southern Nevada Health District License to provide services at the EMT level as required by the State Of Nevada and Clark County.

MCFPD Fire Station 853 is located 14.6 mile to ski resort not 26 miles as stated. Fire Station 856 is located 1.5 miles from the ski resort station and units available as staffing allows.

Paragraph 5

An ambulance company unit is staged at the Ski Resort for Fire District responses. Due to heavy traffic delays or road closures, response times can be greater than 45 minutes or more. This unit is coordinated by MCFPD thru the ambulance company and not staffed or staged all the time.

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3.11 Traffic

The increased visitor volume will contribute to higher traffic congestion on SR156.

The MCFPD also encourages the developer or USFS to fund a traffic/visitor impact study. This study should cover periods of maximum usage including winter break for the Clark County School District, and holiday weekends.

Summer Services

The summer activities included in this plan will require specialized training for personnel, personal protective equipment, and other support equipment. These resources are not available to Mt. Charleston Fire Protection District to perform patient rescue and extrication. MCFPD requests to be included on all specialized training related to activities at ski resort.

New Facilities

MCFPD request that USFS and developer comply with all local, state and federal building codes related to fire code and provide for adequate water resources for any type of fire suppression. Provide for all facilities the following fire protection systems, alarms, fire hydrants, fire lanes, Knox Box type control keys. Include also a designated helicopter landing zone for urgent medical emergencies.

Reference to Scoping Report June 6, 2017: Comment

Pg. #16 Discussion and Mitigation

Fire "The ski area maintains a fire truck and trained fire control personnel". The Mt. Charleston was not made aware of this unit to include capabilities, equipment, and trained fire control personnel for structure and wildland fire emergencies.

The EIS indicates an anticipated 25% increase in call volume with the expansion. MCFPD requests the opportunity to review the basis for this estimate and the anticipated distribution by month (or season). MCFPD has one rescue unit which can be and it can be unavailable for several hours during warm weather if personnel are involved in a hike in call. During those times, only non-transport units are available for response to the Ski Resort. A wildland fire, structure fire or vehicle accident within the District can easily tie up all MCFPD resources leaving only a delayed response capability for the Ski Resort.

We request to be included in the discussions related to the submittal of the land use application to Clark County for review and approval by the Clark County Board of Commissioners pursuant to the Clark County Code and all applicable laws.

Please feel to contact me at jorge.gonzalez@clarkcountynv.gov or 702-305-4010 should you have any questions.

Sincerely

Jorge Gonzalez
Fire Chief

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