

## LETTER

## RESPONSE

**Wollam Grove Management, Inc.**  
P.O. Box 153, Bonsall, CA 92003

Letter B4

July 28, 2014

Mr. Mark Slovick  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

Subject: Lilac Hills Ranch Revised Draft Environmental Impact Report (RDEIR)

Dear Mr. Slovick,

I own a 56-acre site that borders the east property boundary of the proposed Lilac Hills Ranch development. My family and I live and operate a flower field and avocado grove on the property. Given the placement of such a large-scale residential community next to my property, and other adjacent agricultural operations, I anticipate significant land use and operational conflicts between the two uses. Regardless of the proposed mitigation measures identified in the RDEIR, the conflicts associated with the noise, dust, smoke, and pesticide use generated by the operation of my business will create long-term edge effect issues that may never be resolved. As the owner of Wollam Grove Management Inc., I appreciate the opportunity to comment on the RDEIR for Lilac Hills Ranch. I offer the following comments that should be evaluated when considering the adequacy of the RDEIR.

LAND USE

- The County's new General Plan was adopted in 2011 after 12 years of discussion, compromise, and community involvement. The resulting Land Use Element Map identified a five-plus-square-mile corridor located generally between I-15 and West Lilac Road as Semi-Rural Residential (SR-4). The proposed Lilac Hills Ranch (Project) and my property are located within the SR-4 zone. Under the existing Semi Rural land use designation, the 608-acre Project site could accommodate approximately 110 dwelling units. The Lilac Hills Ranch proposes 1,746 dwelling units. This is incompatible and in direct conflict with the existing zoning, surrounding agricultural land uses, local Community Plans, Regional Comprehensive Plans, and Regional Transportation Plans.

If it is the County Board of Supervisor's direction to see this SR-4 corridor develop in a manner similar to the Lilac Hills Ranch development, then I would recommend that my 56-acre property and the surrounding properties all be redesignated to the Village Residential (VR 2.9) land use category. This would maintain land use consistency that is practical and feasible to all property owners in the area.

B4-1

B4-2

B4-1 This comment is an introduction to comments that follow. No further response is required.

B4-2 The comment provides factual background information and the commenter's opinion regarding planning issues within the SR-4 corridor, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.

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<p><u>Lilac Hills Ranch RDEIR</u></p> <ul style="list-style-type: none"> <li>▪ The County's General Plan sustainable development policy utilizes a two-part strategy that incorporates Smart Growth.           <ul style="list-style-type: none"> <li>I. Part One: Direct new growth to areas where infrastructure already exists (such as the established Village in Valley Center's central valley).</li> <li>II. Part Two: Retain agriculture and large parcels for functioning rural lands that clean the air, provide vital watersheds, and support diverse forms of wildlife, among other functions.</li> </ul> </li> </ul> <p>The sustainable development works only when its two interdependent parts work together. The Lilac Hills Ranch Project undermines both aspects of this strategy. The Project introduces a "new" village into Valley Center with residential/commercial intensities far beyond anything anticipated in any local, General, or Regional Plan. Further, it forces a large development into an area with limited or no infrastructure and results in the removal of over 500 acres of active and historic agricultural land. As such, the project does not meet the General Plan sustainable development criteria and is not consistent with the County General Plan, the Valley Center and Bonsall Community Plans, or the San Diego Association of Government's (SANDAG's) Regional Plans.</p> <ul style="list-style-type: none"> <li>▪ Land Use Policy 1.2: Leapfrog Development. <i>Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the Leadership in Energy and Environmental Design Neighborhood Development Certification (LEED ND) or an equivalent.</i> For purposes of this policy, leapfrog development is defined as Village densities located away from established villages or outside established water and sewer service boundaries. The Project proposes a new village, outside the area approved in the General Plan, in a location with little infrastructure, at densities higher than any other village plan, and that is incompatible with surrounding land uses and zoning. Given that the Project conflicts with all the criteria of what leapfrog development should not do, Lilac Hills Ranch truly is a leapfrog development. As such, the Project is inconsistent with the County General Plan and policies that define and support it, the County's Community Development Model, the Valley Center and Bonsall Community Plans and SANDAG's regional plans. Further, the RDEIR wrongfully surmises that by adopting amendments to the County General Plan, Valley Center and Bonsall Community Plans, and SANDAG's regional plans, that the Project will now conform to these plans and the environmental effects would be considered less than significant. Nowhere is there any discussion on the probability of these General and Community Plan amendments ever being discussed or approved. Without such assurance beforehand, this Project cannot be justifiably considered.</li> <li>▪ As a region, with SANDAG providing coordination, we have been trying to steer growth to incorporated cities where transportation investments are occurring, and where goods, services, and employment are in abundance. The proposed project is not consistent with this effort. It contradicts growth principles that all jurisdictions have developed through SANDAG, and conflicts with the Regional Transportation Plan and Sustainable Communities Strategy (SCS).</li> </ul>	<p>B4-3</p> <p>B4-4</p> <p>B4-5</p> <p>B4-6</p> <p>B4-7</p> <p>B4-3</p> <p>B4-4</p> <p>B4-5</p> <p>B4-6</p> <p>B4-7</p>	<p>B4-3 The commenter states that the project does not meet the General Plan sustainable development criteria and is not consistent with the concern about the project consistency with General Plan "smart growth" policies. Conformance with the General Plan and Land Use Policy 1.2 are addressed in Global Response: Project Consistency with General Plan Policy LU-1.2. With respect to the comment that the project will result in the removal of over 500 acres of active and historic agricultural land, see subchapter 2.4 of the FEIR for a thorough discussion on this issue. The project was analyzed pursuant to the County's LARA Model and was determined to be an important agricultural resource. With implementation of Mitigation Measure M-AG-1, the project would result in a less than significant level of impact. (See subchapter 2.4.6 of the FEIR.)</p> <p>B4-4 The comment restates General Plan Policy LU-1.2 and asserts that the project proposes a new village outside the area approved in the General Plan, in a location with little infrastructure, at densities higher than any other village plan and that is incompatible with surrounding land uses and zoning. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this matter.</p> <p>B4-5 Please refer to response to comments to B4-3 and B4-4 above.</p> <p>B4-6 The comment asserts that there is no discussion on the probability of the General and Community Plan amendments being approved and without that assurance the project cannot be considered. The County acknowledges your comment and opposition to the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p> <p>B4-7 The comment asserts that the project is inconsistent with the SCS. The SCS is a comprehensive set of programs that provide incentives to jurisdictions to use the many tools available to encourage the provision of housing in a manner that is compact, affordable and that is close to or incorporates features that discourage the use of an individual automobile. Section 4A of the TTP Vision Goal 2030 provides that "... communities, particularly those along major transit corridors, are more compact, yet they don't feel crowded thanks to good urban design and landscaping. People enjoy living in multi-family and mixed use</p>
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	<p>B4-7 (cont.)</p> <p>neighborhoods within an easy stroll of retail stores, parks, playgrounds, childcare, healthcare, restaurants, movie theatres, museums, vocational schools, and other recreational services and activities. .. Our rural communities have grown but retain their small-town, country charm. .. Our neighborhoods are beautifully landscaped with native trees and flowers. Our streets are walkable and wheelchair accessible, and they're safer to cross. We regularly walk and ride our bikes, and this increased physical activity makes us healthier." The policies within the SCS serve to implement this Vision. However, the SCS, SB 375 or SANDAG do not regulate local jurisdictions' land use decisions (Government Code Section 65080(b)(2)(K).)</p> <p>The project carries out the intent of the SCS as stated in the Vision Goal 2030 which is consistent with the County's related General Plan policies. See also the comment letter submitted by SANDAG and associated response included as letter A7. The FEIR analyzes whether the project meets all of the relevant policies listed in Table I-1, including the "sustainable development" lynchpin principles of LU-1.2 and the Community Development Model, as described throughout each of the appropriate subchapters of the FEIR and in Appendix-W to the FEIR. See Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>Agriculture will be promoted through farmers' markets and the integration of tree crops into the community landscaping. The FEIR shows impacts on agriculture will be less than significant with the incorporation of mitigation measure M-AG-1 (Subchapter 2.4.6 of the FEIR) The project would not result in significant impacts to biological resources. The property is not located within a proposed Pre-Approved Mitigation Area and impacts to upland vegetation will be mitigated through the dedication of appropriate habitat. (Subchapter 2.5 of the FEIR.) Impacts related to GHG emissions will be less than significant. (Subchapter 3.1.2.1 of the FEIR.)</p>
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<p><u>Lilac Hills Ranch RDEIR</u></p> <ul style="list-style-type: none"> <li>▪ The SCS is the region's strategy for addressing GHG emissions targets for land use and transportation. The RDEIR fails to address the Project's conflicts with the SCS strategies.</li> <li>▪ The new County General Plan graphically depicts the locations for future growth. The intent of the Community Development Model of the General Plan is to intensify development in existing villages -- not to create new villages. The Community Development Model was applied in Valley Center during the General Plan update process. Village boundaries were drawn. Village densities were planned to feather from the commercial and mixed-use core to meet the Semi-Rural designations. Twenty-five percent (25%) of the community's future development is now planned for the "Village" area in the center of the Valley Center Planning Area, at the community's traditional "crossroads" where road, water, and wastewater infrastructure, as well as schools, churches, shops and businesses are already in place. The SP/GPA/RDEIR conflicts with the existing General Plan in that nowhere in any of these documents is there any justification for this extra Village and its associated list of significant impacts on lands that are planned for rural residential development and the use and preservation of agriculture. Further, there is no evidence for the conclusion that this Project is necessary for achieving any public objective.</li> <li>▪ The RDEIR states that well over half of the homes within five miles of the Project are on lots less than two acres in size. Many of these lots are located within previously approved planned communities (Lawrence Welk) or created under a former zoning that permitted the smaller lots. The current General Plan requires a four-acre minimum lot size. The use of this example of smaller lots is not a valid rationalization to propose 10 times the residential density and 2,800-square-foot lots. This is inconsistent with the County General Plan, Valley Center and Bonsall Community Plans, the RCP, and the RTP.</li> <li>▪ In the cumulative development section of the RDEIR, there are eight new subdivisions noted within a several-mile radius of Lilac Hills Ranch that total 157 acres. Each of these subdivisions was approved utilizing the existing 2+ acre zoning. The 157 acres yields a total of 41 lots, which is consistent with the rural character of the area, the local Community Plans, surrounding agricultural uses, and does not place a burden on the local roads, infrastructure, or native habitats. Given the size, location and density of the Project, the 608-acre Lilac Hills Ranch development is not consistent with local and regional plans nor with surrounding land uses.</li> <li>▪ H-2.1 Development That Respects Community Character." <i>Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element.</i> Placing an urban project the size of Del Mar into a rural, predominantly agricultural area designated for Semi-Rural uses, is a significant degradation and detraction from the "character of surrounding development." This Project is inconsistent with the Semi-Rural land use designations established by the General Plan and Community Plans for this area, as well as all the Guiding Principles.</li> </ul>	<p>B4-8 and B4-9</p> <p>The Community Development Model is a planning device adopted by the County that is used in part to assign future land use designations on the County's Land Use Map and for the application of Land Use Policy LU-1.2. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this matter. here are numerous policies in the General Plan that contemplate that future growth will occur and provide direction with respect to its future planning, such as M-2.1 (require development projects to provide road improvements), M-3.1 (require development to dedicate right-of-way), S-3.1 (Require development to be located to provide adequate defensibility) and COS-2.2 (Requiring development to be sited in least biologically sensitive areas).</p> <p>B4-8 cont.</p> <p>B4-8</p> <p>B4-9</p> <p>B4-10</p> <p>B4-11</p> <p>B4-12</p> <p>B4-10 The comment states that the project is inconsistent with the General and Community Plans and the RTP. Please refer to responses to comments B4-3 and B4-7 above.</p> <p>B4-11 The comment states that given the project's size, location and density it is not consistent with the local and regional plans or with surrounding land uses. Please refer to responses to comments B4-3 and B4-7 above.</p> <p>B4-12 The comment states that the project is inconsistent with the Semi-Rural land use designations established by the General and Community Plans for this area and will degrade the "character" of the surrounding areas.</p>
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	<p>B4-12 (cont.)</p> <p>Please refer to response to comment B4-3 above, the project proposes to amend the General Plan including the Valley Center and Bonsall Community plans to allow a new Village, amend the Valley Center Community Plan Map to allow Village Residential and Village Core land uses and amend the Bonsall Community Plan to allow Village Residential land uses. The FEIR (subchapter 3.1.4.2) analyzes the existing General Plan and community plan policies and concludes that the project is consistent with General Plan and Community Plan policies that address community character. Community character is defined as those features of a neighborhood, which give it an individual identity and the unique or significant resources that comprise the larger community. Community character is also a function of the existing land uses and natural environmental features based on a sense of space and boundaries, physical characteristics (such as geographic setting, presence of unique natural and man-made features, ambient noise, and air quality). Each community planning area in San Diego County identifies its community character attributes and outlines goals and policies intended to preserve those attributes. The FEIR also notes that the Valley Center and Bonsall Community Plans describe their respective planning areas/community character as “rural”.</p> <p>In particular, “Rural Character” is to be maintained in future developments in Valley Center by prohibiting monotonous tract developments and requiring site design that is consistent with the rural community character. For example, Land Use Goal 2 provides that development maintain the Valley Center’s rural character through appropriate location and suitable site design. Policy (B) (4) requires new residential development adhere to site design standards which are consistent with the character and scale of a rural community. Elements that are particularly important in achieving this is a built environment that is integrated into the natural setting and topography, retention of natural vegetation, agricultural groves, riparian habitats, buffering residential areas through the use of landscaping and preservation of open space. The Bonsall Community Plan Policies LU-1.1.1 and LU-1.2.2 are concerned with the preservation of rural qualities and lifestyle. LU-1.1 provides that in order to retain Bonsall’s rural character, design review be used to ensure that development is planned in a way that respects this character with building and site design.</p>
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	<p>B4-12 (cont.)</p> <p>The project has been designed to incorporate the design principles set forth in the Community Plan policies. Sensitive site design is used, open space areas are preserved, the built environment is integrated into the natural setting when possible, the location near existing infrastructure minimizes the expansion of public services, and buffer areas are utilized throughout the plan. Although the project would differ from existing uses in the immediate surrounding area, through sensitive site design these differences have been minimized. A Town Center with village green provides a community focus for this new village. Extensive open space, parks, and a trail system located within the village will retain its rural quality and rural lifestyle.</p> <p>West Lilac Road has been designed to retain the rural feel of the roadway. Project development along West Lilac Road, east of the western entrance, would consist of single-family detached homes on 100-foot minimum width lots. The wide spacing between these homes combined with the landscaping and multi-use trail on the south side of West Lilac Road provides a transition from the existing homes and users of West Lilac Road to the denser areas of the project. None of these lots would have direct driveway access onto West Lilac Road which helps retain the rural feel of the roadway.</p> <p>In addition, the project has been designed to be compatible with the existing rural character of the immediately adjacent areas. The area immediately surrounding the project site consists of gently rolling topography with agriculture being the predominant use. There are small older farm houses and new custom homes. The project would differ from the existing uses but through sensitive site design has minimized the differences between it and the existing uses in the immediate surrounding area.</p> <p>The Specific Plan, Chapter 3 establishes design guidelines that will, among other things, establish transitions from adjacent spaced residential and agricultural uses to the denser uses within the entire Village. Single family attached units would all be located internally in the Town Center and Neighborhood Center. The project also incorporates various design features to reduce visual effects along the project perimeter. These include the use of wider lots, grade separations or landscape buffers in areas where there are existing homes. Along the west side of the project, the large riparian woodland would be preserved, providing separation from the project and</p>
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	<p>B4-12 (cont)</p> <p>existing homes. In areas adjacent to existing agriculture, a 50 foot wide buffer planted with fruit trees will provide a transition from the project to the existing uses.</p> <p>The existing land uses and conditions of the two community plan areas that surround the project are highly variable. Existing conditions include large towns (e.g. Valley Center), small towns (Bonsall), small planned communities (e.g. Hidden Meadows, Circle R), gated communities, equestrian oriented communities, spaced and estate residential, extensive groves and small boutique farms. There are RV parks, small commercial areas and small manufacturers (e.g. rock products). All of these uses coexist and create a broad definition of "rural" for both of these community plan areas.</p> <p>There are a minimum of three specific plan developments in Valley Center featuring small urban style lots, attached housing and commercial uses that have been previously approved and determined to be consistent with the "rural" character of Valley Center. Circle R specific plan, located in the Valley Center Community Planning Area, is located in a rural land use designation which only allows for a rural density of 1 du/2acres (SR-2), however the plan included 378 townhomes on lots of 2,800 square feet, and 27 'estate' lots with lot sizes up to 4-acres and a golf course and restaurant. It is served by sewer but is still regarded as rural. Woods Valley Ranch SPA also located in the Valley Center Community Planning Area has a rural density designation on the Valley Center Community Plan but includes three neighborhoods with lots ranging from 5,000 square feet, 15,000 square feet and one-half acre, plus a golf course, and restaurant. As stated in the Valley Center Community Plan, Woods Valley is defined as a rural residential community consistent with the community character of Valley Center. Woods Valley Ranch is located outside of any Village and is quite suburban, but has still been determined to be compatible with the rural character of Valley Center. The Orchard Run SPA is located within the urban village of Valley Center which allows for urban scale development in a manner similar to the proposed project.</p>
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	<p>B4-12 (cont)</p> <p>This SPA includes a density of 7.3 dwelling units per acre in the northern portion and 1.5 dwelling units per acre in the southern portion of the property. The plan will result in the creation of seven residential development areas (Garden Apartments, Patio Homes, Estate Lots, and Executive Homes).</p> <p>Bonsall includes clusters of small lots near Vista Valley Country Club and the Bonsall Elementary School. Commercial uses are concentrated at the intersection of Mission Road and SR-76, some distance away. Nonetheless, these uses are part of rural Bonsall.</p> <p>The area along I-15 from Escondido to SR-76 includes land that is within both the Bonsall and Valley Center community plan areas and is the subregion in which the project is located. Land uses are highly varied as illustrated in the Specific Plan, Chapter 1, which includes two studies by Chicago Title Company, analyzing land uses within a one mile and a five mile distance from the project. Within one mile of the proposed property, twenty seven percent (27%) of the existing residential lots are less than two acres in size. There are also small commercial buildings, an industrial rock manufacturing and concrete batch plant and an RV Park. Within five miles of the project, thirty-two percent (32%) of all residential development is classified as multi-family, timeshares or mobile home developments. Fifty-nine percent (59%) of all single family development is on lots smaller than two acres. The aforementioned Circle R Specific Plan is located in this area. Hidden Meadows includes single family lots ranging from 12,000 square feet to 4,500 square feet as well as townhomes and commercial uses. Hidden Meadows originally included a wastewater treatment plant that was later removed and consolidated with the Lower Moosa Wastewater Treatment Facility.</p> <p>Vista Valley Specific Plan shows homes ranging from 0-lot line homes to large estate lots. Meadowood will include homes at densities ranging from three to 20 units per acre and includes a wastewater treatment plant. Commercial and office uses are close by in adjacent projects. The rural community character of this subregion of the BCP and VCP is defined by these highly variable existing conditions.</p>
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## B4-12 (cont)

In looking at the existing rural character of the Bonsall and Valley Center community plan areas; lot sizes and densities do not necessarily determine the rural character of a particular development. The Bonsall and Valley Center Community planning areas both contain specific plan areas that feature small urban style lots, attached housing and commercial uses and are still considered a part of the "rural" character of the respective communities. The project is a contained, sustainable village that includes a variety of residential types and densities similar to those in the surrounding areas. Thus the project is consistent with the existing collection of highly variable uses that are visible as one travels along the I-15 corridor.

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<p><u>Lilac Hills Ranch RDEIR</u></p> <p><u>LEED</u></p> <ul style="list-style-type: none"> <li>▪ At 608 acres, the site exceeds the 320-acre maximum size for a LEED-ND project. The maximum area is based on critical factors such as providing the appropriate density of services and neighborhoods within a compact community and achieving walkability. The EIR fails to address how the project is still in compliance with the LEED-ND program when it exceeds a standard that was determined by the "core committee's research."</li> <li>▪ The objectives of the LEED-ND program are clearly compatible and in alignment with the guiding principles of the County of San Diego's General Plan and with the siting of "new green neighborhoods." As a result, it was integrated into the Leapfrog policy of the General Plan. Any proposed deviation from LEED-ND, such as ignoring siting criteria, size restrictions, and density guidelines, should be evaluated in this context. Therefore, the Project is inconsistent with the LEED requirements and findings.</li> <li>▪ A Specific Plan is an implementation vehicle for the Project. Approval requires compliance with CEQA; consistency as well with the network of interconnected and mutually-supporting elements of the County General Plan, and consistency with the array of implementation actions, strategies and procedures that are in place to achieve the goals and policies that the General Plan sets forth. Inconsistency requires denial of the project OR adapting the General Plan to fit the Specific Plan. Changes of this magnitude (Land Use Policies, Mobility and Safety Elements) to the 2011 County General Plan would require revisiting the Environmental Impact of the San Diego County General Plan and likely invalidates the San Diego County General Plan EIR. Broad and fundamental amendments to adopted General and Community plans would require countywide environmental review. Given the large number of inconsistencies with County General Plan policies and models, the Project, as proposed, cannot move forward until these issues have been resolved.</li> <li>▪ The Project is defined as a Smart Growth development. To be considered a Smart Growth development, it must meet the Smart Growth location criteria. The SPA/GPA cannot satisfy any of the Smart Growth location requirements and, therefore, cannot be considered a Smart Growth project. The location criteria findings include:           <ol style="list-style-type: none"> <li>1. It is not an Infill Project</li> <li>2. It is not an Adjacent Site with Connectivity (does not have at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary and that is equal to or greater than 25% of the project boundary), that is adjacent to previous development.</li> <li>3. The site is not designed as a Transit Corridor or Route with Adequate Transit Service. The only mass transit is two bus routes located 4 miles north of the Project which run the circuit of the four Indian Casinos on SR- 76.</li> <li>4. None of the LEED ND significant public transit service requirements are met by the proposed circulation system. (e.g. at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a ¼-mile walk distance of bus and/or streetcar stops, or within a ½-mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals.</li> </ol> </li> </ul>	<p><b>B4-13 and B4-14</b></p> <p>The comment states that the project is inconsistent with the requirements of LEED-ND.</p> <p>Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on the project's compliance with this policy as related to LEED-ND requirements.</p> <p><b>B4-15</b> The comment states that the project is inconsistent with the General Plan and the implementation strategies that are in place to achieve the goals and policies of the General Plan. The commenter makes a statement about amendment of General Plan guiding principles, goals, objectives and policies. The inconsistencies would require revisiting the environmental impact of the General Plan and invalidated the General Plan's EIR.</p> <p>It is not clear which General Plan policies or implementation strategies the commenter is referring to as being inconsistent with the project. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2. Implementation strategies constitute a work plan to assist the County in carrying out the various goals and policies of the General Plan. The timing of implementation measures may be adjusted over time without amending the General Plan based on new information, changing circumstances and evaluation of their effectiveness as long as the result remains consistent with the intent of the General Plan. In order to approve a project, it must be consistent with the General plan.</p> <p>With respect to revisiting the General Plan's EIR, this would not be necessary because the project does not propose to amend any guiding principles, goals, objectives or policies of the San Diego County General Plan. The project proposes and will require a project-specific General Plan Amendment to amend the regional Land Use Element map to allow a new Village, amend the Valley Center Community Plan Map to allow Village Residential and Village Core land uses, and amend the Bonsall Community Plan to allow Village Residential land uses. Such amendments are purely specific to the proposed project. Since the General Plan Amendment will not amend General Plan principles, goals, objectives or policies, it will not necessitate countywide environmental review of the General Plan Update adopted on August 11, 2011.</p>
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B4-16 The comment states that broad and fundamental amendments to the General and Community Plan would require county wide environmental review. Given the large number of inconsistencies with the General Plan, the project cannot move forward until these issues have been resolved. Please refer to response to comment B4-15 above.

## B4-17 through B4-22

The comment states that the project is inconsistent with Smart Growth development and LEED-ND. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion of these topics.

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Lilac Hills Ranch RDEIR

5. The only transit mentioned by Specific Plan and/or RDEIR is that NCTD might consider a bus stop serving part of the project. This is inadequate and must be addressed in the RDEIR or eliminated as an element of the Project.

B4-22

AGRICULTURAL RESOURCES

- Based on the County of San Diego Guidelines for Determining Significance – Agricultural Resources (County of San Diego 2007c), the Project would have a significant impact if it proposes a school, church, day care, or other use that involves a concentration of people at certain times within *one mile of an agricultural operation* or land under Contract and as a result of the Project, land use conflicts between the agricultural operation or Contract land and the project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

B4-23

- The Project proposes the placement of an elementary school 325 feet from an existing agricultural operation and a senior medical facility 2,400 feet away. The RDEIR declares the direct and indirect impacts on the proposed elementary school and senior facility as insignificant: "*Because the project design locates the school site away from the project boundary (325 feet) and state regulations prevent aerial pesticide "drift" onto neighboring properties*. The RDEIR completely ignores the one-acre Determination of Significance finding radius. Given the required significance finding, the SPA/GPA/RDEIR must address the concentration of people issue and not dismiss the impacts as insignificant. Strict application of the guideline could include the removal of these facilities from the Project.

B4-24

- State pesticide regulations prohibit discharging pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. There are also regulations and label requirements that prevent or minimize "drift" during aerial applications. Drift is the airborne transportation of residual pesticides, during or after pesticide application, via aerial or ground spraying, onto adjoining properties or onto roadways, trails or other routes traveled, by the general public. Figure 10 - Pesticide Application Permits depicts locations where aerial spraying of 10 or more applications per year and/or 60 or more ground spraying applications per year occur on properties that border the Project on the north, south, and east. My existing agricultural operation must continue with aerial spraying to maintain the health of my crops and cost of operations. Proposed Project mitigation measures consist of minimizing pesticide drift, a 100-foot wide fire zone buffer and a fence between the existing groves and proposed single family homes. A public hiking trail is located within the middle of the buffer area. The RDEIR then declares the impact less than significant. This buffer will never be sufficient for new property owners. The proposed mitigation measures are inadequate to properly address the real issue of health, safety, and NIMBY once the Project is built. Consideration could include expanding the buffer area to 200-300 feet and the placement of a road between the agricultural uses and the single-family homes. As noted above in the significance findings, the edge effect issues should be considered significant, particularly if the impacts could result in conversion of agricultural resources to a non-agricultural use.

B4-25

B4-26

B4-27

B4-28

B4-23 The comment restates information contained in the FEIR, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.

B4-24 The commenter refers to a "one-acre Determination of Significance finding radius". It is assumed that the commenter refers to a "one-mile radius" rather than one-acre. However, the approach taken by the FEIR in its analysis of the school site is discussed in Global Response: Project Consistency with General Plan Policy LU-1.2.

B4-25 The comment restates information contained in the FEIR, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.

B4-26 through B4-28

See Global Response: Agricultural Resources, Indirect Impacts.

## LETTER

## RESPONSE

<p><u>Lilac Hills Ranch RDEIR</u></p> <ul style="list-style-type: none"> <li>▪ This edge effect issue further underscores the inherent incompatibility of such a large residential project and the viability agricultural operations to continue to conduct their business. Please explain how State pesticide regulations will not hamstring agriculture uses in this region. } B4-29</li> <li>▪ The 2011 General Plan designated the area where the Project is proposed as a place for agriculture and other rural and semi-rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by historical agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture as witnessed by my existing groves and flower fields. Avocado, and citrus commercial nurseries and other farm operations are located in and around the Project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to sensitive individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building the Project at the planned site would greatly damage many currently productive and successful agricultural businesses. } B4-30</li> <li>▪ The RDEIR fails to discuss problems that may arise from the use of public trails that border active agricultural areas particularly during aerial spraying. The RDEIR also fails to discuss the potential impact of dust and smoke associated with the grading and planting operations, harvesting of crops, and burning of waste plant material. This is of concern given the proximity of vulnerable public receptors such as the schools, parks, and senior center proposed with the Project. Any reduction or changes in my current methods of operation would significantly affect my business and livelihood. } B4-31</li> <li>▪ The RDEIR fails to discuss problems that may arise from the use of public trails that border active agricultural areas particularly during aerial spraying. The RDEIR also fails to discuss the potential impact of dust and smoke associated with the grading and planting operations, harvesting of crops, and burning of waste plant material. This is of concern given the proximity of vulnerable public receptors such as the schools, parks, and senior center proposed with the Project. Any reduction or changes in my current methods of operation would significantly affect my business and livelihood. } B4-32</li> <li>▪ The RDEIR fails to discuss problems that may arise from the use of public trails that border active agricultural areas particularly during aerial spraying. The RDEIR also fails to discuss the potential impact of dust and smoke associated with the grading and planting operations, harvesting of crops, and burning of waste plant material. This is of concern given the proximity of vulnerable public receptors such as the schools, parks, and senior center proposed with the Project. Any reduction or changes in my current methods of operation would significantly affect my business and livelihood. } B4-33</li> <li>▪ The RDEIR fails to discuss problems that may arise from the use of public trails that border active agricultural areas particularly during aerial spraying. The RDEIR also fails to discuss the potential impact of dust and smoke associated with the grading and planting operations, harvesting of crops, and burning of waste plant material. This is of concern given the proximity of vulnerable public receptors such as the schools, parks, and senior center proposed with the Project. Any reduction or changes in my current methods of operation would significantly affect my business and livelihood. } B4-34</li> </ul> <p><u>HAZARDS, HAZARDOUS MATERIALS, WILDFIRES</u></p> <ul style="list-style-type: none"> <li>▪ The development of a high-density project adjacent to agricultural areas presents the need to buffer those agricultural areas from the development and its sensitive receptors (schools, churches, senior centers, parks, homes). However, there is no discussion in the RDEIR which requires development in Semi-rural and Rural lands, which are adjacent to agricultural operations, to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used. } B4-35</li> <li>▪ The RDEIR fails to discuss problems that may arise from the use of public trails that border active agricultural areas, particularly during aerial spraying. The RDEIR also fails to discuss the potential impact of dust and smoke associated with the grading and planting operations, harvesting of crops, and burning of waste plant material. This is of concern, given the proximity of vulnerable public receptors such as the schools, parks, and senior housing proposed with the Project. Any reduction or changes in my current methods of operation would significantly affect my business and livelihood. } B4-36</li> <li>▪ The Project is located within a very high fire hazard severity zone (FHSZ). Locating a project of this size and scope in a very high FHSZ is not consistent with preventive land use planning. The RDEIR states that failure to meet the standard 100-foot Fuel Management Zone (FMZ) for significant portions of the Project would be a significant impact. Section 5.4 } B4-37</li> <li>▪ The Project is located within a very high fire hazard severity zone (FHSZ). Locating a project of this size and scope in a very high FHSZ is not consistent with preventive land use planning. The RDEIR states that failure to meet the standard 100-foot Fuel Management Zone (FMZ) for significant portions of the Project would be a significant impact. Section 5.4 } B4-38</li> </ul>	<p>B4-29 through B-36 See Global Response: Agricultural Resources, Indirect Impacts.</p> <p>B4-37 The comment states that the project is located within a very high FHSZ and would not be consistent with preventive land use planning. The does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p> <p>B4-38 The comment states that the project includes extensive area where fuel management Zones are less than 100 feet wide that was not analyzed and discussed in the FPP or the FEIR. The comment is correct that there are specific areas of the project's perimeter and wildland exposed areas that include less than 100 feet of FMZ. These areas have been evaluated and determined to be suitable with the reduced FMZ and the implementation of additional measures that provide the same practical effect as 100 feet of FMZ. The project fire consultants conducted a detailed analysis of the areas where fuel modification is reduced from 100 feet. In particular, Dudek conducted an analysis of fuel modification zones which analyzed the fire behavior across the project site and compared it against the proposed development footprint, product type and proposed structure setbacks (See APPENDIX J – Fuel Modification Zones Analysis – DUKEK). This analysis was used to support the analysis of Section 4.4 – Defensible Space and Vegetation Management in the FPP. Depending on the individual situation, the reduced width, the off-site fuels, and adjacent buildings, alternatives are proposed. Enhanced fire-resistive construction measures are proposed to be used to mitigate reduced fuel modification zones are detailed in Section 4.5 of the FPP, and FEIR, subchapter 2.7.2.4 and Capabilities Assessment pp 12-13. No additional analysis is considered necessary based on the level of detail provided in the FPP and Capabilities Assessment report.</p>
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## LETTER

## RESPONSE

<p>Lilac Hills Ranch RDEIR</p> <p>Fuel Management Zones of the FPP states "The Project includes a few areas where fuel modification zones are less than 100 feet wide. Based on a review of the RDEIR, the Project includes extensive areas where FMZs are less than 100 feet wide. This is a significant health and safety issue that must be reevaluated. Further, an expanded FMZ must be taken within the Project and not made an obligation of an adjoining property owner/agricultural use." </p> <p>The Project has not provided the FMZ that Fire Codes require.</p> <ol style="list-style-type: none"> <li>1. Refer to Chapter 1, Figure 1-6 Fire Protection Plan. The mitigation offered by the County is that property owners surrounding the Project provide an FMZ by managing fuel loads on their own private lands for the benefit of the Project.</li> <li>2. In most cases, the surrounding properties are used for agricultural purposes. The maintenance of off-site FMZs will reduce the number of acres in agricultural use, resulting in a financial loss for the business operator. This is not acceptable and must be reevaluated.</li> <li>3. This mitigation offered by the County is ineffective, and requires continuous and uniform maintenance by property owners outside the project that do not have a requirement to provide the Project's FMZs.</li> <li>4. The effective mitigation is for the Project to apply a uniform FMZ to Fire Code requirements on the Project's property exclusively. Please amend the Project's Tentative Map and Site Plan to reflect this and remove the impact.</li> </ol> <p>The Deer Springs Fire Protection District (DSFPD) has disagreed with all four Fire Protection Service Options listed in Subchapter 2.7 Hazards. DSFPD has responded that it intends to serve the Project from the existing Station 11 at Circle R Drive and Old Highway 395.</p> <p>Using Station 11 to serve the Project, response times for the furthest area of the Project is 9.5 minutes, and DSFPD has assessed "average" service at 7 minutes on the Project Availability Form. This creates a Significant Impact – Failure to meet 5-minute response time, which has not been mitigated. Counter to the County's statements in the RDEIR, this is a Significant Unmitigated Impact until Mitigation measures are agreed to.</p> <p>The Evacuation Plan does not adequately address the central evacuation issue of the proposed Project – the ability to evacuate over 5,000 residents of the proposed Project utilizing the limited number of roads that serve the Project. Further, the Project has proposed that many of these evacuation roads be approved with substandard widths and capacity reductions. The road type, location, and configurations must be reevaluated to adequately address the safe and timely evacuation process for the Project.</p> <ol style="list-style-type: none"> <li>1. There are only two exits to the west from the Project. Only West Lilac and Circle R Roads provide ingress and egress to the Project. Both are two-lane 2.2F roads built to below standard conditions. The Project does not plan any lane additions or other improvements beyond upgrading West Lilac Road from the Project's westerly entry to Old Highway 395. This limited improvement will not improve the ability for the population to safely evacuate in a wildfire evacuation scenario.</li> </ol>	<p>B4-39 cont.</p> <p>B4-39</p> <p>B4-40</p> <p>B4-41</p> <p>B4-42</p> <p>B4-43</p> <p>B4-44</p> <p>B4-45</p> <p>B4-46</p> <p>B4-47</p> <p>B4-48</p> <p>B4-49</p> <p>B4-50</p> <p><b>B4-39</b> The comment states that an expanded FMZ must be taken within the project and not made an obligation of an adjoining property owner/agricultural use.</p> <p>The comment is inaccurate in that there is no reliance on off-site FMZ. The project's analysis did evaluate off-site land uses and determined that 100 feet of FMZ would be the maximum required for this project. Based partly on off-site land uses (agriculture, ornamental, etc.) along with the project's ability to provide FMZ and additional mitigating measures, reduced FMZs are proposed for some areas, in compliance with the Code.</p> <p>Fuel management zones were reduced in areas where off-site adjacent fuels or land uses would not present a significant threat of tall flame lengths. Mitigation measures were also provided in these areas and include alternative measures that provide the same practical effect as a full fuel modification zone. Obtaining an easement from an adjoining property owner is only one measure that may be used if the standard 100 foot setback for FMZs can not be achieved by the project. Mitigation Measure M-HZ-1 provides that if an easement can not be obtained from an adjoining property owner, the project can select one of the other measures described in the FPP that would achieve the same level of protection and such measure.</p> <p><b>B4-40</b> The comment states that the project has not provided the FMZ that Fire Codes require.</p> <p>FEIR subchapter 2.7.2.4 addresses the project's consistency with the FMZ requirements of the County Consolidated Fire Code. This section explains that in accordance with Consolidated Fire Code Section 4907.2(b), where the standard 100 feet FMZ cannot be met entirely within the boundary of the project, alternative fire protection measures consistent with the Fire Code can be proposed that achieve the same level of protection as fuel modification. Although, several areas of the project site would not meet the 100-foot standard for FMZs as shown on Figure 1-6 of the FEIR, a number of other alternative measures that achieve the same level of required protection were identified in Section 4.4.4 of the FPP. (FEIR, Subchapter 2.7.2.3, and FPP, page 39.)</p>
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## LETTER

## RESPONSE

	<p>B4-40 (cont.)</p> <p>In addition the project incorporated a number of design considerations into the project. Although the project was found to be in compliance with the Fire Code with respect to meeting the 100 fuel modification requirements by either providing a 100 FMZ or complying with the measures outlined in the FPP, the FEIR recognized the inability of the project to meet the 100-foot FMZ per se, and therefore determined there would be a significant impact. Mitigation Measure M-HZ-1 provides that for areas within the project site where buildings do not meet the standard 100-foot setback for FMZ, either an easement shall be obtained from an adjacent property owner or one of the measures described in Section 4.4.4 of the FPP shall be met. In addition, the DSFPD shall approve the specific measure and it shall be incorporated into the site plan or use permit plot plan. Therefore the project does comply with the Fire Code with respect to meeting the 100 fuel modification requirements by either providing a 100 FMZ or complying with the measures outlined in M-HZ-1 and Section 4.4.4 of the FPP.</p> <p>B4-41 This comment states that Mitigation Measure M-HZ-1 requires adjoining property owners to provide the project with an easement in order for the project to comply with the 100-foot setback for the FMZ.</p> <p>Please see response to comment B4-39.</p> <p>B4-42 This comment states that since in most cases the surrounding properties are used for agricultural purposes, the maintenance of off-site FMZs will reduce the number of acres in agricultural use which will result in a financial loss for the business operator. This statement is incorrect in that FMZs are to be cleared except for irrigated agriculture. (FPP, page 41.) In addition the FPP provides that active irrigated agriculture can be retained within the fuel modification zone. (Sections 4.5.1.5 and 4.5.5 of the FPP.) Finally, only those adjoining properties in which easements have been obtained in order to provide an FMZ for the project, would be subject to maintenance obligations of the FMZ.</p> <p>B4-43 This comment states that Mitigation Measure M-HZ-1 is ineffective because it requires adjoining property owners to continuously maintain FMZs even though such owners are not required to provide such FMZs.</p>
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## LETTER

## RESPONSE

	<p>B4-43 (cont.)</p> <p>Obtaining an easement from an adjoining property owner is only one measure that may be used if the standard 100 foot setback for FMZs can not be achieved by the project. Mitigation Measure M-HZ-1 provides that if an easement can not be obtained from an adjoining property owner, the Project can select one of the other measures described in the FPP that would achieve the same level of protection and such measure will be subject to the approval of DSFPD. See also response to comment B4-38 through B4-43 above.</p> <p>Section 4.5.3.5 of the FPP provides that responsibility for maintenance for FMZs will remain with each lot owner and any subsequent owners, through a maintenance agreement with the Home Owner Association (HOA). The HOA's responsibility for maintaining the FMZ would be included in the project's CCRs. If an easement is obtained from adjacent property owners for the purpose of providing an FMZ for the Project, such easement would be subject to the same Project FMZ requirements of the FPP, and thus would be subject to the same arrangement with the HOA and such language would be a part of the easement.</p> <p>Also, DSFPD may take enforcement actions to abate fire hazards in accordance with the requirements of the DSFPD regulations.</p> <p>B4-44 The comment states that effective mitigation measure for the Project would be the uniform application of the FMZ requirements of the Fire Code to the Project.</p> <p>Please see response to comment B4-38 through B4-40 above.</p>
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## LETTER

## RESPONSE

	<p>B4-45 The comment states that DSFPD disagrees with the four options provided in Subchapter 2.7 of the FEIR and that DSFPD will instead serve the project from Station 11. The analysis in the FPP along with the analysis and findings in Capabilities Assessment, was used to recommend the four options that could provide the Project with fire and emergency medical services within the travel times identified in General Plan Policy S-6.4; two of the options would not rely on DSFPD to provide such services. Compliance with General Plan Policy S-6.4 was analyzed under subchapter 2.7.2.3 of the FEIR, section 4.1 of the FPP and the Capabilities Assessment. The travel time standard is intended to (1) help ensure development occurs in areas with adequate fire protection and/or (2) help improve fire services in areas with inadequate coverage by requiring mitigation. (Policy S-6.4). With respect to none of the options being acceptable to the District, the Board of Supervisors will make the final determination regarding the interpretation of Policy S-4.6 and whether to condition the project in a manner that would ensure compliance with this Policy .</p> <p>With respect to DSFPD deciding to service the project from Station 11, this is consistent with the findings of the FPP in which it was determined (by the District as well) that DSFPD would be able to provide adequate services to the project based upon a number of factors, which included that the travel time from the closest fully staffed fire station – Miller station to the furthest structure within the project would meet the travel time identified by the County General Plan. (FEIR, subchapter 2.7.2.3 and FPP Section 4.1, page 31.) As the comment does not raise any specific issue regarding the analysis, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Please see Global Response: Fire Standard for a thorough discussion regarding this topic.</p> <p>B4-46 The comment states that the project's failure to meet the five minute response times based upon DSFPD's assessment that response times for the furthest area of the project would be an average of 7 minutes is a significant impact that requires analysis in the FEIR and is a significant unmitigated impact until Mitigation measures are agreed upon. Please see Global Response: Fire Standard for a thorough discussion regarding this topic.</p>
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## LETTER

## RESPONSE

	<p>B4-47 The commenter asserts that the Evacuation Plan did not adequately address the central evacuation issue of the proposed project - the ability to evacuate over 5,000 residents of the proposed project utilizing the limited number of roads that serve the Project.</p> <p>The primary purpose of an evacuation plan is to identify evacuation routes and to prepare residents for an emergency event. For preparedness of residents, there is a key concept in the Plan known as "Ready! Set! Go!". This is a national program and focuses on education, awareness and preparedness for those living in the wildland-urban interface areas. (Evacuation Plan, page 9.) The Plan also requires that the HOA and DSFPD distribute "Ready! Set! Go!" information on a continual basis along with maps showing the evacuation routes, temporary evacuation points and pre-identified safety zones. (Evacuation Plan, page 11.)</p> <p>In any event, the Evacuation Plan examined the existing and the Project's planned roads and determined that it would provide adequate multi-directional primary and secondary emergency evacuation routes. The primary evacuation routes are accessed through a series of internal roadways within the project which in turn permits direct emergency evacuations to the north, south, east and west to accommodate pending wildfire conditions. The project's evacuation routes that lead to the north, west, south and east provide the best opportunities for moving residents and guests away from a wildfire threat. During an emergency evacuation from the project, the primary and secondary roadways will have to be shared with responding emergency vehicles and may reduce the available useable widths of the roadways required for a smooth evacuation process. The Evacuation Plan also noted the possibility of backups at various intersecting external roadways, however all proposed roads within the Project are designed in accordance with the County's Consolidated Fire Code. (Evacuation Plan, page 8.)</p> <p>The Evacuation Plan also notes that local residents would not necessarily use the same evacuation routes that are currently available to them, as conditions may exist during an emergency that will dictate a different route.</p>
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## LETTER

## RESPONSE

	<p>B4-47 (cont.)</p> <p>Evacuations can be fluid and such orders will often depend on the fire behavior. (Evacuation Plan, page 11.) In addition, a regional evacuation plan was developed by the Deer Springs Fires Safe Council and approved by CALFIRE and the DSFPD. This community emergency evacuation plan is a significant component of the Project's Evacuation Plan. (Evacuation Plan, page 10.) The evacuation information and map are attached as Exhibit 2 to the Evacuation Plan. The FEIR determined that the impacts associated with emergency response and evacuation plans would be less than significant in that the Project would not interfere with the implementation of any applicable emergency or evacuation plan, including the Draft Valley Center Community Evacuation Plan, described above, and would not construct structures greater than 35 feet high that would interfere with emergency aircraft operations. (Subchapter 2.7.3.3 of the FEIR).</p> <p>Contingency plans are one of the immediate priorities for development by Incident Command when a wildfire event occurs in a wildland-urban interface area. Community evacuation plans will be integrated into an incident contingency planning process developed by Incident Command to assist and coordinate evacuation planning for all residents in the area. (Reference for this information/statement was made interpreting existing Deer Springs Fire Safe Council information, which is prepared/coordinated by the Deer Springs Fire Safe Council, Deer Springs Fire Protection District, and CalFire; statements here also developed by first-hand experience by FireWise 2000, Inc. personnel) There is not one area of San Diego County that offers roadways that can handle a mass evacuation without some level of congestion. It is infeasible to build roads to that standard. Instead, contingency plan evacuations will be implemented in phases, based on predetermined trigger points so smaller percentages of the evacuees are on the road at the same time. When a wildfire occurs, if it reaches a predetermined trigger point, then the population segment located in a particular vulnerable area downwind of that trigger point would be evacuated. Then, when the fire reaches the next trigger point, the next phase of evacuation would occur. (See attached, Tuttle, A.E. 2003. Wildland Fire Evacuation in the U.S.: The Color vs. the Letter of the Law. California Department of Forestry and Fire Protection, Sacramento, California, USA. 10 pp.)</p>
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## LETTER

## RESPONSE

	<p>B4-47 (cont.)</p> <p>This would allow smaller groups of people and correspondingly fewer vehicles to more freely evacuate areas. (Reference for this information/statement was made interpreting the Deer Springs Fire Safe Council Community Plan and a brochure provided to the community entitled "Plan Your Escape Now," which was prepared and coordinated by the Deer Springs Fire Safe Council, and coordinated with the Deer Springs Fire Protection District and CalFire). As noted above evacuations can be fluid and evacuation orders will often depend on the fire behavior of a given event. It should be also noted that the Project's emergency access has been reviewed by DSFPD, as a part of the FPP. Therefore, the Evacuation Plan provides adequate information regarding the ability to evacuate the project.</p> <p>B4-48 The comment states that the project has proposed a number of evacuation roads that will be approved with substandard widths and capacity reductions and therefore the road type, location, and configurations must be reevaluated to adequately address the safe and timely evacuation process for the project.</p> <p>All proposed on site roads have been designed in accordance to the County Consolidated Fire Code and DSFPD standards and would exceed the driveway minimum horizontal radius, fall within the 20 percent maximum allowable grade and meet or exceed the minimum paved width requirements. Specifics of the proposed roadway designs compared to the Consolidated Fire Code are detailed in the Road Standard Comparison Matrix., Attachment P of the FPP. (FEIR, Subchapter 2.7.2.3,. See also FPP, pp 33-38.)</p> <p>Also, all of the exceptions being requested for the roadway improvements, were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions would be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.) Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant.</p>
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## LETTER

## RESPONSE

	<p>B4-48 (cont.)</p> <p>The Evacuation Plan examined the existing and the project's planned roads and determined that it would provide adequate multi-directional primary and secondary emergency evacuation routes. The Evacuation Plan noted that during an emergency evacuation from the project, the primary and secondary roadways will have to be shared with responding emergency vehicles and may reduce the available useable widths of the roadways required for smooth evacuation process. However, all of the proposed on site roads are designed in accordance with the County's Consolidated Fire Code. (Evacuation Plan, page 8.) Therefore, the FEIR adequately addressed the project's road network, including any exceptions to roadway improvements, as related to the safe and timely evacuation process for the project.</p> <p>The width of each access road to the project allows for two-way traffic; the project is not proposing to reduce the current width or design speed of any of the roadways leading to and from the project site.</p> <p>B4-49 and B4-50</p> <p>The comment notes that there are only two exits to the west from the project and the project will make only a limited improvement to West Lilac Road, which will not improve the ability for the population to safely evacuate in a wildfire evacuation scenario.</p> <p>The project's Traffic Impact Study (Appendix E to the FEIR ("TIS")) and design work for roadway improvements prepared by Landmark Consulting for the project, was utilized in the preparation of the Evacuation Plan. Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant.</p> <p>With respect to the comment that only limited improvements to West Lilac Road are being made, subchapter 2.3 (Transportation) of the FEIR analyzed the project's impacts to surrounding roads, intersections and Caltrans facilities based upon the TIS. Tables 2.3-23 and 2.3-24 provide a summary of all the significant direct and cumulative impacts and the corresponding mitigation measures,</p>
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## LETTER

## RESPONSE

	<p>B4-49 and B4-50 (cont.) respectively, resulting from impacts of the project. In particular, the TIS identified only that segment of West Lilac Road between Old Highway 395 and Main Street as having a significant direct impact resulting from the project requiring mitigation (M-TR-4).</p> <p>Finally, please see response to comment B4-47 above regarding the Evacuation Plan and region and/or community plans. In terms of the project, the applicable regional evacuation plan was developed by the Deer Springs Fires Safe Council and approved by CALFIRE and the DSFPD. This community emergency evacuation plan is a significant component of the project's Evacuation Plan. (Evacuation Plan, page 10.)</p> <p>As explained above, a contingency plan developed by Incident Command when a wildfire event occurs will include community evacuation plans to ensure a coordinated evacuation plan for all residents in the area.</p>
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## LETTER

## RESPONSE

<p><u>Lilac Hills Ranch RDEIR</u></p> <p>2. There is only one exit to the East from the Project. West Lilac to Lilac Road is the only Public Road to the East. This road has horizontal and vertical curve radii that make it very marginal in an Evacuation scenario in which not only thousands of cars need to exit the area, but also first responders need ingress.</p> <p>▪ The applicant proposes placing a large project with several vulnerable populations into a very FHSZ with substandard roadways and fuel modification zones. The Project and RDEIR must be reevaluated to provide standard FMZs throughout the Project. This issue is strained further by uncertain access to the Project site by fire apparatus. That access depends on at least two private roads, for which easement access is uncertain, and the applicant's proposal to gate those access points. These constraints on access are problematic for fire safety and evacuation efficiency. Given the above, the Project must either be redesigned, an alternative project selected, or the project abandoned in order to address this key health and safety element.</p>	<p>B4-51</p> <p>B4-52</p>	<p>B4-51 The comment states that there is only one exit to the East from the project; West Lilac to Lilac Road. This road has horizontal and vertical curve radius that makes it very marginal in an Evacuation scenario in which not only thousand of cars would need to exist the area, but also first responders would need ingress.</p> <p>Please see response to comment B4-49 and B4-50 above.</p> <p>B4-52 The comment notes that the project places a large project with several vulnerable populations into a very FHSZ with substandard roadways and fuel modification zones</p> <p>The comment is correct that there are specific areas of the project's perimeter and wildland exposed areas that include less than 100 feet of FMZ. These areas have been evaluated and determined to be suitable with the reduced FMZ and the implementation of additional measures that provide the same practical effect as 100 feet of FMZ. Please see response to comment B4-38.</p>
<p><u>UTILITIES</u></p> <p>▪ Off-site routes for recycled water and sewer pipelines have been found to lack sufficient legal right-of-way easements, as represented in figure 3.1-8, "Off-site Sewer Collection System." This determination is confirmed by Valley Center Municipal Water District (VCMWD). This finding makes construction of sewer and recycled water pipelines for the Project problematic. This issue must be resolved before the Project can move forward.</p> <p>▪ There continues to be ambiguity concerning the water reclamation facility being proposed by the Applicant for Lilac Hills Ranch. The specific plan states that VCMD will direct trucking of wastewater to an off-site treatment facility for the first phase of development. (p.ll-33), and that during phase one wastewater from up to 100 dwelling units may be trucked off-site on a regular basis. However, phase one consists of 350 units, which may necessitate additional trucking of wastewater over narrow twisting roads. This procedure will add numerous daily trips to and from the Project, trips that could go on for a lengthy but undetermined period. The last proposal was to construct a temporary 26,000-foot (5 miles) four-inch force main sewer line where effluent would be pumped from a temporary pumping station. While the current specific plan mentions treating the trucked effluent, it does not mention if the reclaimed water would be transported back to the Project, which would double the daily trips to and from the Project. Other potential issues are accidental sewage or sludge spills, not to mention the impact those frequent truck trips have on the traffic flow to and from the Project.</p> <p>▪ The proposed wastewater recycling facility (WRF) will be using hazardous materials, such as chlorine, in its treatment process. The facility is located only 686-feet from the proposed school site and only 250 feet from homes. Considering that there was a recent accidental spill of hazardous materials from a similar facility in Escondido, the RDEIR conclusion that the risks from the use of toxic, hazardous materials in proximity to a school are "less than significant" is overly optimistic and must be reevaluated.</p>	<p>B4-53</p> <p>B4-54</p> <p>B4-55</p> <p>B4-56</p>	<p>All proposed on site roads have been designed in accordance to the County Consolidated Fire Code and DSFPD standards and would exceed the driveway minimum horizontal radius, fall within the 20 percent maximum allowable grade and meet or exceed the minimum paved width requirements.</p> <p>Specifics of the proposed roadway designs compared to the Consolidated Fire Code are detailed in the Road Standard Comparison Matrix., Attachment P of the FPP. (FEIR, Subchapter 2.7.2.3. See also FPP, pp 33-38.) Please see response to comment B4-48.</p> <p>The comment also states that access to the project site by fire apparatus is strained because access depends on at least two private roads for which easement access is uncertain and the applicant proposal to gate those access points. These constraints on access are problematic for fire safety and evacuation efficiency.</p>

## LETTER

## RESPONSE

	<p>B4-52 (cont)</p> <p>With respect to the issue of gates and fire safety. As detailed in Section 4.2.7 of the FPP and subchapter 2.7.2.4 of the FEIR, gates proposed for the project would be in compliance with DSFPD guidelines and County Consolidated Fire Code, Section 503.6. Any gate or barrier across a fire access roadway shall have specific plans reviewed and approved by DSFPD, and receive Specific Plan approval prior to installation. (FPP, page 36.) In addition, per the DSFPD conditions attached an part of the Project Availability Form (see Appendix R) gates accessing more than four residences or residential lots, or gates accessing hazardous institutional, educational, or assembly occupancy group structures shall also be equipped with approved emergency traffic control-activating strobe light sensors(s) or other devices approved by the fire code official. Additional analysis was added to the FEIR that determined automated gates as recommended will require less time, roughly one-quarter to one-third the time to open and proceed through the gate and would results in minimal delay related to the time for the gate to move from closed to open. (FPP, pp 35-36.) The project would comply with DSFPD guidelines and County Consolidated Fire Code requirements related to gates, the recommendations of the FPP and project conditions related to emergency access, therefore no impacts associated with noncompliance with applicable fire codes related to secondary emergency access to the project would result. Also, as a result of the findings of the fire modeling, project design features would be incorporated into the project, including the provision of secondary emergency access roads, and Mitigation Measure M-HZ-1, which would reduce impacts to wildland fires to less than significant. (FEIR, Subchapter 2.7.2.4, and Subchapter 2.7.6.)</p> <p>With respect to the issue of easements and fire safety. The commenter did not specify the easement road being referred to in this comment. In any event, the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that impacts associated with transportation hazards would be less than significant. (FEIR, subchapter 2.3.3.3.) Please see also Global Response: Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion regarding easements.</p> <p>B4-53 Please see also Global Response: Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion regarding easements.</p>
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## LETTER

## RESPONSE

	<p>B4-54 Wastewater treatment plants require a minimal continual flow to start-up and operate. Trucking of raw wastewater to an off-site treatment facility would occur if the new wastewater treatment plant is constructed on-site to serve the first phase of development. Trucking of up to the first 100 homes would allow sufficient flows to accumulate to operate the new treatment facility. Once sufficient flows have accumulated (up to 100 homes), trucking of raw wastewater to an off-site plant would cease.</p> <p>B4-55 Please see response to comment B4-54. Also, reclaimed water would not be trucked back to the project.</p> <p>B4-56 As discussed in the FEIR, subchapter 2.7, the risk of accidental release of chlorine gas is less than significant. The multiple safety measures taken include required inspections by multiple agencies; a Risk Management Plan and plant design all ensure that the impact of the location and operation of the WRF is less than significant.</p> <p>The Escondido event involved chlorine in a gaseous form which in the event it escapes from its containment area (i.e., into the air) is likely impossible to recover or contain. In the case of the project's WRF, chlorine would be utilized in a liquid form (as is typical with VCMWD's other treatment facilities). All treatment chemicals would be contained within a designated area of the site. Additionally, the overall site shall be designed to drain to a low point adding further opportunity to contain a spill to within the plant site.</p>
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## LETTER

## RESPONSE

<p><u>Lilac Hills Ranch RDEIR</u></p> <ul style="list-style-type: none"> <li>▪ In the Hydrologic Assessment of the RDEIR, Figure 5 depicts over 100 wells within a one-mile radius of the Project. Groundwater studies indicate high concentration of total dissolved solids (TDS) and salt. These water quality conditions may limit groundwater application, depending on the crop and the ability to blend with other water sources. The Project proposes additional on-site settling ponds which the RDEIR purports will assist in groundwater recharge rates. The RDEIR failed to analyze the potential impacts on surrounding wells, that are used for potable and agricultural uses, as the proposed sewage settling ponds will introduce increased levels of TDS and salts into the groundwater.</li> </ul> <p><u>TRANSPORTATION/TRAFFIC</u></p> <ul style="list-style-type: none"> <li>▪ The SP/GPA will add over 5,000 urban residents to country roads while reducing road widths, reducing road design speeds, and ignoring other road standards established for safe, efficient transportation. A review of the Project's transportation plan indicates the Project:</li> <ol style="list-style-type: none"> <li>1. Fails to provide necessary services and facilities</li> <li>2. Is inconsistent with General Plan premises that the development will pay for itself;</li> <li>3. Is inconsistent with the General Plan minimum standard for Level of Service (LOS) D on County roads;</li> <li>4. Compromises the safety, comfort and quality of life of prospective residents as well as all the other residents of Valley Center who depend on these Mobility Element roads.</li> </ol> <p>The SP/GPA must be amended to address these issues.</p> <li>▪ There are a number of significant deficiencies with the proposed transportation plan that must be addressed before the Project can be considered and/or move forward:</li> <ol style="list-style-type: none"> <li>1. The proposed Lilac Hills Ranch Project contemplates overburdening 2.2E and F two-lane, narrow winding country roads to a substandard Level of Service E and F. It also requests ten Exemptions to County Road Standards for the 1½ to 3 miles the Project needs to connect the 25,000 plus trips for this automobile-based urban sprawl project with I-15. These road configurations are not adequate to serve the proposed Project ADT and to provide safe evacuation routes. Why are exceptions being proposed for the Project?. Compliance with current road safety standards should be mandatory.</li> <li>2. The applicant does not have legal right-of-way to use Mountain Ridge Road and Covey Lane to serve the Project.</li> <li>3. The applicant does not own legal right-of-way, nor can they achieve legal right-of-way without the use of Eminent Domain, to build the proposed Covey Lane/West Lilac Road intersection in compliance with minimum County Sight Distance Line standards. How can a project be approved if the applicant has no control over the mitigation area, and cannot guarantee compliance with the proposed development standards and mitigation requirements.</li> <li>▪ Guiding Principle 6. <i>Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.</i> The Project instead</li> </ol> </ul>	<p>B4-57</p> <p>B4-58</p> <p>B4-59</p> <p>B4-60</p> <p>B4-61</p> <p>B4-62</p> <p>B4-63</p> <p>B4-64</p> <p>B4-65</p> <p>B4-66</p> <p>B4-67</p>	<p>B4-57 There are no sewage settling ponds proposed as part of this project.</p> <p>B4-58 The project is not proposing to reduce the current width or design speed of any of the roadways leading to and from the project site.</p> <p>B4-59 The comment expresses the opinions of the commentator only. There is no evidence that the project's transportation plan does not provide the "necessary services and facilities." The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.<sup>67 &amp; 68</sup>. Contrary to the comment, the proposed project would support a multi-modal transportation network. To facilitate resident access to I-15 transit services and TDM facilities, the project would provide project residents with a private on-demand transit service to nearby transit hubs. (See Lilac Hills Ranch Specific Plan (June 2014) Section III, Development Standards and Regulations (Specific Plan), pp. III-11 to III-12.) This privately operated transit service would be funded through homeowner association (HOA) fees, would be available to all project residents, and would provide residents with a connection between the project site and nearby transit hubs, such as those planned near the I-15/Gopher Canyon Road interchange or I-15/SR-76 interchange.</p> <p>The project also includes a requirement that a TDM program be implemented to foster alternative modes of transportation. (Specific Plan, pp. III-11 to III-12; see also, FEIR Table 1-3, Additional Project Design Considerations, p. 1-54.) As detailed in the Specific Plan, the TDM is to include the following aspects:</p> <ul style="list-style-type: none"> <li>• Implement a ride-share program with transit vouchers or other options that may be determined by the HOA.</li> <li>• Implement bicycle circulation improvements to improve internal bicycle circulation and encourage the usage of bicycles to include requiring provision of bicycle parking facilities, including the secured bicycle parking facilities in specific locations as specified in this Specific Plan.</li> <li>• Promote Carpool/Vanpool programs, which may include a Senior Transportation service.</li> <li>• Promote available websites providing transportation options for residents and businesses.</li> <li>• Create and distribute a "new resident" information packet addressing alternative modes of transportation.</li> </ul>
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## LETTER

## RESPONSE

<p><u>Lilac Hills Ranch RDEIR</u></p> <p>states NCTD might be interested in a bus stop. The Project is entirely car-dependent. If approved, there are no commercial uses, no schools, and no parks until Phase 3, which is 6 to 8 years after construction of the Phase One houses. The Project does not have legal rights for the required ingress and egress to be able to construct them. If they were constructed, they would undermine connectivity by blocking emergency egress, and detract from supporting community development patterns in the central Villages, where the General Plan and Community Plans call for potential construction of roads to enhance connectivity. Additionally, off-site road improvements will not be constructed until later phases further exacerbating traffic flow and emergency evacuation. The Specific Plan must be amended to adequately address Project phasing that will accommodate the needs of the Project residents and the surrounding community.</p> <ul style="list-style-type: none"> <li>▪ The intersection of West Lilac Road and Old Highway 395 is already a dangerous intersection. Project phasing within the SPA does not propose signalization of this intersection until the construction the 585th Project dwelling unit. The timing of the installation of the signal must be reevaluated to prevent a very dangerous health and safety condition.</li> <li>▪ In the RDEIR, the County has not provided adequate disclosure regarding off-site impacts of the Project and its Alternatives to surrounding property owners. This information is necessary to demonstrate Project Feasibility and determine if the Project can ever be legally built.</li> <li>▪ The only mass transit that exists is the North County Transit District (NCTD) Bus Routes 388 and 389. The closest access is at SR-76 and Old Highway 395, a minimum 4-mile trip north from the Project site. These routes run eight times a day and mainly link the Pala, Pauma, Rincon and Valley View Casinos to the Escondido Transit Center. If you are going to a regional shopping center or work center, you must take a 30-minute bus ride to the Escondido Transit Center and transfer to another route. The mass transit system only works if you are a Casino patron and must be reevaluated as to its realistic viability.</li> <li>▪ The Village is promoted as a walkable community. However, the school and senior care facility are the furthest from the designated town center, making the seniors travel the full two-mile length of the Project, uphill. Given this situation, most of those seniors will be driving through the project. Although trails are proposed within the Project, the viability of the system is inadequate to serve the purpose. As such, notion that this is a walkable community should be reevaluated or deleted as a Village amenity.</li> <li>▪ The RDEIR identified eight segments of the I-15 where the Project would impose significant cumulative impacts. They include: <ul style="list-style-type: none"> <li>▪ Between Riverside County Boundary and Old Highway 395.</li> <li>▪ Between Old Highway 395 and SR-76.</li> <li>▪ Between SR-76 and Old Highway 395.</li> <li>▪ Between Old Highway 395 and Gopher Canyon Road.</li> <li>▪ Between Gopher Canyon Road and Deer Springs Road.</li> </ul> </li> </ul>	<p>B4-68 B4-69  B4-70  B4-71  B4-72  B4-73  B4-74  B4-75  B4-76  B4-77</p> <ul style="list-style-type: none"> <li>• Promote programs to encourage workplace peak hour trip reduction, including staggered work hours, regional ride-matching services, and tele-commuting.</li> <li>• When transit routes are extended to the Community, participate in providing the necessary transit facilities, such as bus pads, shelters, signs, lighting, and trash receptacles.</li> <li>• Coordinate with NCTD as to the future sighting of transit stops/stations within the project site. As the project is built-out, the NCTD may adjust routes and services to meet the needs of the growing community. The project would allocate a site for public transportation within the Town Center. The applicants will continue to coordinate with NCTD and MTS regarding potential transit options for the project site. (Specific Plan, pp. III-11 to III-12.)</li> </ul> <p>B4-60, B4-61, and B4-62 The project is consistent with the County General Plan policies, especially those relating to mobility issues. Please refer to Appendix W of the FEIR.</p> <p>B4-63 and B4-64 Details of the road design modification are listed in Table 1.2 of the FEIR and included in the TIS (FEIR Appendix E).</p> <p>B4-65 and B4-66 Please refer to the Global Response: Easements (Covey Lane and Mountain Ridge Roads).</p> <p>B4-67 and B4-68 Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2. Regarding project consistency with the General Plan ten guiding principles, all of the goals and policies of the General Plan are based upon the ten guiding principles that are set forth in Chapter 2 of the General Plan.</p>
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## LETTER

## RESPONSE

	<p>B4-67 and B4-68 (cont)</p> <p>(General Plan, p.2-6) The FEIR analyzes whether the project meets the ten guiding principles by its analysis of the appropriate policies that implement those principles throughout each of the subchapters of the FEIR and in Appendix W to the FEIR.</p> <p>The project is consistent with Guiding Principle 6.GPAR As the discussion included with Guiding Principle 6 indicates, the transportation system in the unincorporated areas of the County will rely primarily on the public road network. (General Plan, page 2-11.) However, this planning principle includes the requirement for new development to focus on connective transportation routes for non-vehicular travel such as pedestrians and bicycles. The project is designed to encourage residents to walk and bike within the community through the placement of Neighborhood Centers within one-half mile of all homes, the provision of 16 miles of trails. The project will construct a Master Plan Trail, consistent with the County's CMTP, built to Type D standards, along the south side of West Lilac Road.</p> <p>B4-69 As to the comment that the project is "entirely car-dependent," please see the response to the preceding comment. Regarding ingress and egress, the project does have the legal right to provide each proposed ingress and egress point. Additionally, the proposed commercial, school, and park uses would not "block emergency access."</p>
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## LETTER

## RESPONSE

	<p>B4-70 See response to comment B4-69</p> <p>B4-71 The off-site traffic improvements would be constructed at the time required based on when County LOS standards are exceeded. Since the County standards would not be exceeded early in the project development, no emergency evacuation, significant impacts would occur due to lack of roadway improvements.</p> <p>B4-72 The County does not agree that the W. Lilac Road / Old Highway 395 intersection is "dangerous." As to the timing of the subject traffic signal, a quantitative analysis was conducted to determine the timing of the need for the recommended improvement.</p> <p>B4-73 All offsite impacts and mitigation measures are fully disclosed in the FEIR, consistent with County standards of practice.</p> <p>B4-74 Please see the response to comment B4-67 and B4-68 regarding the on-demand transit service and TDM program. These project features will increase the viability of the project's use of public transit.</p> <p>B4-75 The comments regarding the distances between the school and senior care facility and the proposed town center are noted, although it is incorrect to state that the project would not be "walkable." Lilac Hills Ranch currently has two east-west public trail segments, one along the northern boundary of the project site (W. Lilac Road) and the other along the most southern portion of the project. In addition to the two public trails, the project proposes developing a system of multi-purpose trails that traverse the project site, linking the northern and southern public trails. The Lilac Hills Ranch's multi-purpose trails network will provide connectivity to parks, private recreation, schools, and commercial areas within the project site. The multi-purpose trail network is proposed as a combination of smaller feeder and natural trails in the open space area of Lilac Hills Ranch, and an 8-foot community pathway that traverses the project site providing connectivity to the existing County Regional Trail System.</p> <p>B4-76 See response to comment B4-75.</p>
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## LETTER

## RESPONSE

<p><u>Lilac Hills Ranch RDEIR</u></p> <ul style="list-style-type: none"> <li>▪ Between Deer Springs Road and Centre City Parkway.</li> <li>▪ Between Centre City Parkway and El Norte Parkway.</li> <li>▪ Between El Norte Parkway and SR-78</li> </ul> <p>Because these cumulative impacts are the responsibility of another jurisdiction (Caltrans), and no program is available to which the applicant could make a fair share contribution, no feasible mitigation measures are available to reduce the significant cumulative impacts at these three intersections. The impacts would remain significant and unavoidable. Since the impacts appear unavoidable, there is no reason that the region should suffer because of this Project. As such, this is justification to deny the Project or consider a reduced Project alternative that would not further impact the I-15.</p> <ul style="list-style-type: none"> <li>▪ The RDEIR proposes a transportation plan where the commercial amenities within the Project capture many of the daily trips within the Project. The RDEIR failed to analyze the issue that the school, commercial businesses, and other amenities that would capture local traffic will not be constructed and/or in business for years to come. As such, the first several phases of development will require residents to travel local roads and freeways to Escondido or Temecula for food shopping and to Valley Center for other needs. As the required road improvements will not be constructed until later phases, the phasing of the road improvements must be reevaluated in the RDEIR to accommodate the impacts to local road and highways.</li> <li>▪ The amount of additional traffic generated by the Project will cause 10 roadway segments, 11 intersections, and 8 highway segments to fall to an unacceptable Level of Service E and F. County transportation policies prohibit any project that causes an intersection or roadway segment to fall to LOS F. The RDEIR must be amended to include mitigation to elevate these intersections and roadway segments to an acceptable level of service.</li> <li>▪ The Specific Plan denotes the location of two roundabouts on West Lilac Road. Their location appears to be outside of the main right-of-way, with a larger portion located within the Project area. This alignment creates additional, circular movement that would further slow traffic speed had it been aligned with the center line of the existing road. It appears the alternative location is based on the lack of public right-of-way to accommodate the circle. Please justify the alternative alignment.</li> <li>▪ A school is proposed in the center of the Project to accommodate local children. Again, the RDEIR failed to analyze the impacts on local and regional roadways over the time period (years) until the school is built. Additionally, the RDEIR did not analyze the potential traffic impacts if the school capacity is less than a K-8 and/or if children from outside the Project would be driven each day to and from the facility.</li> </ul>	<p>B4-77 cont.</p> <p>B4-78</p> <p>B4-79</p> <p>B4-80</p> <p>B4-81</p> <p>B4-82</p> <p>B4-77</p> <p>B4-78</p> <p>B4-79</p> <p>B4-80</p> <p>B4-81</p> <p>B4-82</p>	<p>The comment restates information contained in the FEIR, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.</p> <p>The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.</p> <p>The traffic study does account for the fact that much of the non-residential uses will be built in later phases. The internal capture percentage was assumed to be much less in early phases of the project as compared to project build-out. Also, as noted in Response to comment B4-71, the off-site traffic improvements would be constructed at the time required based on when County LOS standards are exceeded</p> <p>All significantly impacted County roadways/intersections would be mitigated to LOS D or better operations with the exception of two locations, Gopher Canyon Road between E. Vista Way and Little Gopher Canyon Road (TR-12), and Pankey Road between Pala Mesa Drive and SR-76 (TR-16). Both the FEIR and TIS explain why the necessary mitigation is infeasible. (FEIR, subchapter 2.3; TIS Section 6.4.)</p> <p>Roundabouts are a form of intersection treatment. As with any intersection, drivers approaching a roundabout must reduce their speed. A well-designed roundabout forces traffic to safely reduce speeds at each approach, by means of small horizontal curves, increasing the safety and efficiency of the intersection. The roundabouts proposed in this project have been designed to maintain safe speeds at every approach.</p> <p>The initial phases of the project that would be built before the school is built do not assume any internal capture between the school and residential uses. Therefore, the FEIR traffic analysis did account for the potential impacts that would occur before the school is built. Additionally, the trip generation rate for the school accounted for the fact that some trips would be generated from outside the project site.</p>
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## LETTER

## RESPONSE

Lilac Hills Ranch RDEIR

BIOLOGY

- M-12.9 Environmental and Agricultural Resources: "Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors and agricultural lands. Within the MSCP preserves, conform siting and use of trails to County MSCP Plans and MSCP resource management plans."

The trails proposed for the Project will intrude into the FMZ buffer and Limited Building Zone ("LBZ") areas adjacent to the designated biological open space, as well as the open space itself. The fences proposed to separate and protect both adjoining agricultural uses and segments of the open space from the edge effects created by the Project (human intrusions, domesticated cats and dogs, invasive plant species, etc.) will also create barriers to the movement of wildlife. Instead of treating the biological open space as retreats and corridors for the movement of wildlife, the trails proposed would become parks for humans and their pets. This will have an adverse effect on the value of the open space for wildlife.

- Six of the seven riparian crossings within the Project have culverts of 18- to 30-inch diameter. These culverts are too small to allow effective transit by wildlife and will impose barriers to movement or, more likely, funnel wildlife onto the road surfaces where there will be encounters with automobiles. To be effective transit elements under the roads crossing the wetlands, and to permit wildlife to avoid crossing the surface of the roads, such culverts should be a minimum of 40- to 54-inches to accommodate larger mammals. As the biology technical report notes, southern mule deer are relatively common, and three were seen on-site. Further, animals that are more nocturnal than the deer seen diurnally by Recon, such as gray fox, coyote, striped and spotted skunk, raccoon, bobcat, mountain lion, and long-tailed weasel, are more likely to use larger diameter culverts than the proposed small ones. What is the basis for proposing smaller culvert pipes? The culvert system should be reevaluated to accommodate wildlife movement between the project and adjoin parcels and with the Project itself and not just surface runoff.

- The biological report suggests that although the listed, *anticipated species*, and others not listed in the report, would be impacted by habitat loss caused by grading, construction, and human occupation, it finds that the impacts would be: "...less than significant given the wide ranges of the species and the fact that the project does not contain a regionally significant population of these species."

However, since the biological report has not quantified the following, how can the report establish that the impacts are "less than significant?"

1. The existing on-site population densities;
2. The population density thresholds that are deemed significant; or
3. The expected on-site population densities after construction of the Project.

- The County's biological analysis:

1. Fails to demonstrate with data what a regionally significant population is for any of the cited species.

B4-83

B4-84

B4-85

B4-86

B4-87

B4-88

B4-83 A trail system is included as part of the project. Fences would be required along the backs of lots that are adjacent to the biological open space to minimize the edge effects listed in the comment. Fences would also be installed at enter points to the biological open space areas to direct foot-traffic to the designated trails. The entire trail system within the biological open space area would not be fenced, allowing wildlife to move more freely. Signage will be installed to educate people using the trail system of the sensitive nature of the surround preserved habitats.

B4-84 It is acknowledged that large culverts would accommodate the larger wildlife species. The project found no significant impacts to wildlife movement and the culverts are not proposed for that purpose. Rather, the drainage culverts are to be installed to carry surface water offsite. Therefore, culverts of the 40 – 54-inch size are not required as they would be too large for the sizes of most of the drainages being crossed.

B4-85 The size of the culverts were determined in large part by the size of the particular drainage being crossed and the amount of anticipated flows that must pass through them.

B4-86 The analysis of significance conforms with the County of San Diego guidelines for the determination of significant impacts.

B4-87 The on-site population densities were estimated based on observations made during multiple site visits. Population thresholds for significant populations of species are based on a review of known information on the distribution, range, and habitat characteristics of the particular species. Post-construction population densities can only be inferred based on the amount of preferred habitat that is to remain in the biological open space area.

B4-88 The FEIR analyzes impacts to the cited species identifying that impacts to individuals may occur through indirect edge effects. The FEIR concludes the impacts would be less than significant due to the small population of the cited species on-site is not large enough to be considered a regionally significant population. (Appendix G, p. 80) A quantitative baseline for the regional population is not required because a quantitative baseline is not available in the scientific literature. The best available information was used to support the conclusions of the FEIR.

## LETTER

## RESPONSE

<p><u>Lilac Hills Ranch RDEIR</u></p> <p>2. Fails to present, or even estimate, the on-site population density of any of the cited species to allow a comparison of the site to the region.</p> <p>3. And, fails to explain how the scope of a species' range can exempt the loss of a local population.</p> <p>▪ There is little mention of Stephens Kangaroo Rat (<i>Dipodomys stephensi</i>), a federally-listed species, in the discussion of field surveys and impacts to listed species. Given that the project site is well within the range of the species, and its presence within the County [particularly north San Diego County] is acknowledged, why were no trapping studies done to determine the extent of its presence? Given that the diurnal surveys, both directed and general, spent an average of 4.9 minutes per acre of project site, how is the County's consultant able to state that none are present?</p> <p>Thank you for your consideration of these issues. I look forward to your response.</p> <p>Sincerely,</p> <p><i>Mark Wollam</i> Wollam Grove Management, Inc.</p>	<p>B4-89 B4-90 B4-91</p> <p>B4-89 The on-site population densities were estimated based on observations made during multiple site visits in accordance with the County of San Diego biology resource survey guidelines.</p> <p>B4-90 Information on the range of a species offers insight into where the populations density of a particular species is greatest. This information is used in comparison with the estimated on-site population for the species to determine if a significant impact is likely to occur. In addition, on-going regional planning efforts have designated areas of high biological value for preservation (i.e., areas where a high density of wildlife species are anticipated due to large patches of native habitat), which does not include any of the project area.</p> <p>B4-91 A focused habitat assessment for the Stephen's kangaroo rat was conducted on the site. This habitat assessment concluded that little to no suitable habitat to support this species is present in the project site due to various factors. The majority of the known historic occurrences of Stephen's kangaroo rat in the vicinity of the project are decades old and for the large part have been extirpated, reducing the likelihood of this species to occur on the site due to the lack of a source of animals.</p>
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# Wildland Fire Evacuation in the U.S.: The Color vs. the Letter of the Law

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## Abstract

California, Australia and South Africa share similar wildfire regimes, fuel types and wildland-urban interface. Firestorms can be intense and move quickly from wildlands into residential areas, threatening lives and property. Various policies have developed in each of these regions regarding the role that fire and law enforcement agencies play in urging homeowners to evacuate their homes or not. This presentation will examine a range of local, state and federal approaches to evacuation within the United States. Examples will illustrate the various legal mandates, criteria for evacuation decisions, the role of Incident Commanders and local law enforcement in implementing evacuations, and legal liability. A “Perfect Storm” example of a forested residential community in southern California will be presented, in which fuels buildup is too extensive to effectively provide fire safe clearances, and therefore the first focus is on evacuation and community shelter planning.

## Introduction

The overstocked conifer of the Rockies, the dense chaparral of California’s Coast Ranges and the drought-stricken ponderosa of the southwest are all products of successful fire suppression throughout western America.

Nearly a century of aggressive firefighting has permitted fire adapted ecosystems to convert to unnatural mixes of species and densities. Today much of the western US suffers from overgrown ladder fuels and overstocked stands. Also aggravated by drought, beetle kill and reduced timber management, recent wildfires have set records in size and intensity.

Compounding the fuel buildup is the explosion of residential growth into the wildlands. This dangerous mix of homes located in fire-adapted ecosystems challenges the skills of fire managers. Urban homeowners who have moved into the wildland interface are often unaware of the fire risk and either do not understand the need, or purposely do not want to clear the vegetation that surrounds their home. Throughout the west new public education campaigns for clearing fuels and creating defensible space are being developed – but it will be a long time before widespread fire safe neighborhoods are achieved.

Over the past 10 years California has been ambitiously developing an infrastructure of Fire Safe Councils. Composed of local residents, fire officials, utilities, and insurance industries, these groups plan and implement fire safe projects in their own communities. Boosted by funds from the National Fire Plan, hundreds of projects have been initiated statewide. Similar approaches are underway in most western states as the US slowly reverses decades of forest neglect.

Despite current efforts to reduce fuels and increase suppression resources, fire seasons across the west continue to set records in size and cost. Driven by hot dry winds, fire fronts many miles long have swept, within hours, up canyons and through communities, destroying homes

and taking lives. Although there are situations where homeowners can successfully protect their homes from slow moving ground fires, most of the western US interface has not yet reached the point of being sufficiently fire safe to rely solely on a “shelter in place” approach. At this early stage in US fuel reduction efforts, evacuation must remain a tool available to fire managers to increase public safety.

### **U.S. Approaches to Wildfire Evacuation**

Outside viewers sometimes stereotype evacuation approaches in the U.S. and Australia as more diametrically opposed than they actually are. The simple dichotomy is sometimes presented as the Australian model of “prepare, stay and defend” versus the U.S. model of “leave or you will be arrested”. When these are examined more closely however, neither is entirely true, and the actual use of evacuation lies along a continuum.

The issue of evacuating residents in the face of advancing wildfire goes straight to the heart of doctrines addressing the private property rights of homeowners to defend their property and empirical evidence on how homes actually ignite. During a slow moving ground fire, if homes have sufficient clearance and firesafe construction, homeowners may safely “shelter in place” and save their homes by dousing stray embers blowing onto roofs and decks. The opposite also occurs however, when homes are surrounded by ladder fuels and dense canopies, have wood shingle roofs and firewood stacked against the wall, and face a windblown wall of flame with 80 foot-plus flame lengths. These homes, and the people in them, have little chance of surviving, and threaten the lives of firefighters who find themselves obligated to stay and assist them.

Other speakers will examine the Australian approach in more detail. Here we look more closely at the U.S. approach, first with a summary of how wildland fire protection is administered across the nation.

### **Overview of fire protection in the United States**

The forests and wildland-urban interface (WUI) of the U.S. are protected by an overlapping structure of federal, state and local fire suppression agencies, each with a different primary area of responsibility, authority and capability. All have a tradition of strong cooperation on the fire line and during evacuations.

**At the federal level** the primary wildland fire protection agency is the US Forest Service (USFS), with 191 million acres (77.3 million ha) of forests and rangelands concentrated in the national forests of the 17 western states and Alaska. Other federal agencies with wildland fire protection responsibilities include the Bureau of Land Management (BLM), Bureau of Indian Affairs, National Park Service and the US Fish and Wildlife Service. Federal agencies traditionally specialize in wildland fire suppression and do not have authority, equipment or training for structural protection, except for the Park Service, which is trained and equipped to protect park facilities.

**At the state level** wildland fire protection varies across the 50 states. California has one of the largest state-managed fire departments, providing fire protection to 31 million acres of wildlands, generally in the mid-elevation conifer, oak and chaparral vegetation zones. The California Department of Forestry and Fire Protection (CDP) staffs 229 state and 405 contract fire stations during fire season; operates an Aviation Unit of 23 air tankers, 13 air

attack planes, and 9 Super Huey helicopters; runs 197 inmate fire crews for hand line construction; and operates 370 state-owned wildland engines. In addition to its core wildland mission, CDF also provides structural protection, emergency medical assistance and all-risk services to dozens of local governments through contract agreements. Most other states have some state-based wildland suppression capability, with access to inmate crews, engines and aviation resources, but they are generally less developed than the California model. Outside of California, the USFS and BLM are the prevailing wildland fire protection agencies in most western states. Local fire agencies within a state are linked through their state Office of Emergency Services or State Fire Marshall's office, which coordinates the response of state and local agencies for all types of disasters (hurricanes, tornados, earthquakes, floods etc.).

**Local Fire Protection** is provided by a network of city, county and local district fire departments. Local districts are staffed with a mix of paid and volunteer personnel and generally supported by a local tax or fee. As suburban communities spread into adjacent brushlands and forests, many local fire districts are starting to add wildland capability to supplement their traditional focus on structure fire suppression.

Across the nation we therefore find a continuum of wildfire suppression capacity, ranging from the mega-infrastructure of the federal government to the local muster of volunteer residents. Large incidents typically have an Incident Command Team assigned operating under the Incident Command System (ICS) to direct the response. When the incident involves multiple jurisdictions, a Unified Command Structure is established, with an Incident Commander representing each affected jurisdiction to provide coordinated response. The relationships among fire agencies are spelled out in a quilt of compacts, contracts and memoranda of understanding describing how the various governmental entities cooperate and apportion costs to each other.

### The Evacuation Process

Evacuation is a collaborative undertaking among fire authorities, law enforcement and emergency service managers. Policies across the US follow certain common themes and do not differ substantially across federal and state boundaries. Evacuations can be divided into four phases: pre-planning, decision, evacuation and re-entry.

**Pre-planning** for evacuations can be quite well developed and detailed, yet flexible enough to respond to specific fire behavior. The Incident Evacuation Plan developed by Los Angeles County Fire Department provides a comprehensive example of evacuation planning with voluntary, mandatory and "shelter in place" options. (LA County Fire Department 2001). The 12 million people of the Los Angeles basin live in the heart of a fire-adapted coastal chaparral ecosystem with the "great natural fuel break" of the Pacific Ocean to the west. A series of severe fires in 1992, 1993 and 1996 swept rapidly from outlying wildlands into dense residential neighborhoods, highlighting the need for better interagency coordination. The LA County Fire Department took the initiative to facilitate 36 months of collaboration among fire jurisdictions, law enforcement, elected officials and animal control agencies to develop a comprehensive format for evacuations.

Similar to an Incident Action Plan, an Incident Evacuation Plan provides a structured format which details actions and specifies agency responsibilities. Plans are generally separated into public elements and confidential portions that are available only to the involved responders. Plans contain such elements as:

- Incident command posts and staging sites for fire apparatus, designated on a common map base
- Protocols for communications, command and control between fire and law enforcement authorities
- Zones and trigger points for phasing evacuation stages
- Designated evacuation routes and alternates to separate ingress of firefighters from egress of residents. Intersections for traffic control points are identified and adjusted as the fire advances
- Delineated areas with entrapment potential, such as neighborhoods with narrow, dead end roads
- Locations of hydrants and water supplies, cell phone reception, stockpiles of detour signs, tape and traffic cones etc.
- Plans for shelter in place or evacuation of schools, organized camps, hospitals and senior homes
- Contingency plans for dealing with injuries, providing heavy equipment for pushing abandoned cars off roads, and temporary morgues
- Public information networks and communication centers for keeping the public and media informed
- Single ordering points designated to avoid duplicate resource orders being placed and to assist in after-action documentation and cost recovery

Inter- and intra-agency safety training is important. Fire agencies need to train law enforcement and media representatives in fire safety so they can protect themselves in the field. All firefighters, and especially those unfamiliar with the area, need pre-briefing on fire behavior, fuel conditions and specific incident plans.

A sample of evacuation policies and plans from various states are noted in the References. Although these are formal agency plans, it should also be noted that local church groups and private organizations may develop evacuation plans for their own members as well.

**The decision to evacuate:** The decision to evacuate is determined as much by concern for the safety of firefighters as for the safety of residents. Firefighters need safe ingress unhindered by the confusion of fleeing residents and general traffic.

The decision to declare an evacuation generally rests with the fire protection agency. Thus, whether the fire is a federal, state or a Unified Command fire, the decision rests with the Incident Commander(s), the Operations Chief, or comparable designee. In reality the decision is collaborative with law enforcement, which is usually already on the incident in an Agency Representative role within the ICS command structure when evacuation decisions are made.

In some cases, local law enforcement may decide on its own initiative to implement an evacuation, independent of the fire control agency. This can be complicated when each has separate command and control systems, communication structure, policies and cultures. Usually the experience of one uncoordinated event between fire and law enforcement will serve as a wakeup call and stimulate efforts to initiate cooperative pre-planning before the next one.

Voluntary evacuations may be issued when there is time and fire behavior may change. In LA County, voluntary evacuations may be triggered when the fire is 24 hours away. Early voluntary evacuations can significantly reduce the local population if mandatory evacuation later becomes necessary. Mandatory evacuations are triggered when there is imminent threat to an area. In LA, criteria include a wind driven fire which is within 10 miles and may burn through the neighborhood in 1-4 hours. A “shelter in place” option is also considered for low intensity fires where structures have good clearance, are made of fire resistant materials, and the Fire Department feels it is safe to stay.

Decisions to evacuate are not taken lightly. Poorly coordinated evacuations can cause as many or more problems as they solve. Risks include traffic jams, accidents as cars run off the road due to smoke and poor visibility, blocking of ingress to firefighting equipment, entrapment in areas with no escape, overloading of receiving sites, dealing with pets and livestock, and patrolling against looting of abandoned neighborhoods. Deliberate pre-planning, staging, sufficient staffing and good communication during the evacuation are critical for reducing chaos and confusion.

**Implementing the Evacuation:** Once the fire authority requests an evacuation, local law enforcement is in charge of implementation. This is typically the county sheriff's office, Highway Patrol, state police and other peace officers. Thus, on a US Forest Service fire, the Incident Commander will call for an evacuation of a designated region, and the local sheriff or state police will implement it. Like the fire services, law enforcement also has a mutual aid system that is very effective in quickly bringing local law enforcement agencies and Highway Patrol together in adequate numbers. In some instances when resources are strained the National Guard may be called to assist.

Traffic control points for egress, ingress and perimeter controls are established, and residents within the designated zone are notified of the order to evacuate. The Emergency Alert System (EAS) is activated through radio and television media, and reverse 911 telephone systems or community phone trees are activated where available. The fire agency uses its public information network (press releases, Web postings, e-mail to pre-listed addresses etc.) and public address systems to disseminate information about the fire. Law enforcement officials fan out through neighborhoods to contact homeowners. No entry or re-entry of residents is permitted into the closed area. Residence-by residence contact is made and fire behavior, safe travel routes and safe collection centers are explained.

**Evacuation Centers:** The Red Cross in conjunction with the county emergency services office is responsible for establishing shelters for short-term housing and care. Temporary Evacuee Collection Points may be designated as holding areas for smaller groups until shelter locations can be established. Stationing a fire representative at the evacuation site to provide updates on the fire and to seek specific information for citizens is extremely helpful in soothing frayed nerves, and addressing a common complaint that “...once we evacuated we didn’t know what was happening and no one spoke with us.”

Displaced pets and livestock are an important element in evacuation planning and implementation. Hundreds of dogs, cats, and birds may appear at local animal shelters, and horses, livestock, llamas and others may be directed to local fairgrounds. To assist in animal evacuations, many communities have formed animal evacuation assistance groups.

**Enforcement of Evacuation:** Although the color of authority is brought to the resident's door, in fact most jurisdictions interpret evacuations to be voluntary and not mandatory. In California, Penal Code section §409.5 allows law enforcement officers, including CDF peace officers, to close or restrict an area or protect a command post in the event of a calamity. If a person willfully and knowingly enters an area that has been closed, they can be found guilty of a misdemeanor. Further, if the person is interfering with rescue personnel they could also be subject to arrest under Penal Code section §148. However, these sections are silent on the authority to remove a person who refuses to leave their home. A series of Attorney General and county counsel opinions acknowledge that the law on mandatory evacuations is complex and mostly un-tested in modern times, hence most jurisdictions across the country stop short of arresting residents who refuse to leave.

It is also more effective for peace officers to keep moving in order to warn more residents, rather than take the time to arrest those who refuse to leave. The names and addresses of individuals choosing to stay are written down and communicated back to the command post as verification that contact was made, so that property can be checked after the fire moves through. The names and addresses of "next of kin" may be requested, which often leads to an abrupt change of heart. In some jurisdictions, forceful evacuations of children and disabled individuals are made, even if the guardians refuse to leave. In most cases, residents respond positively to the color of authority and comply with instructions.

In a Colorado example, the Southwestern Pueblo County Wildfire Evacuation Plan (2002) explicitly states these assumptions:

- "A. The public will receive and understand official information related to evacuation.
- B. The public will act in its own interest, and evacuate dangerous areas spontaneously or when advised to do so by local government authorities.
- C. People who refuse to follow evacuation instructions will be left alone until all that are willing to leave have evacuated. Then – time and conditions permitting – further efforts may be made to persuade the "stay puts" to evacuate."

Experience in LA County so far finds around 85% compliance by residents; the other 15% are dealt with on a case-by-case basis. Minors and disabled individuals are forcefully removed. Adults can stay, but not endanger their children. Similar provisions are cited in numerous other states.

**Once Out, Stay Out:** Permission to re-enter the evacuated area is prohibited until the evacuation is officially terminated. Authority to arrest violators is clear and enforced as a misdemeanor. Although patience is thin among affected homeowners who are anxious to see the fate of their homes, strong enforcement enables firefighters to operate unobstructed. Residents opting to stay must remain in proximity of their residence. Persons roaming the area, even though a resident, can be forced to leave or be removed.

**Re-Entry:** Large-scale evacuations should have formal re-entry plans, considering the potential for hazardous conditions, staging of re-entry and security. Clearance for safe re-entry is announced through the media, at roadblocks, evacuee collection points and shelters.

**Liability:** The issue of liability for officials who call -- or fail to call – for an evacuation has not been seriously challenged. The California legislature provided statutory immunity from liability for public entities and public employees acting in the scope of their employment for

“any injury caused in fighting fires” (Government Code §850.4). This has been interpreted broadly through case law and would be invoked in the event of an evacuation claim.

LA County interprets their responsibility for life and safety of residents as superceding the risk of liability in calling for an evacuation. As long as logical policies have been adopted, with a deliberate action plan and clear decision points, then legal vulnerability is reduced. Calling for evacuation exposes the fire agency to no more liability than responding to an emergency medical or structure fire call. In fact the agency could be accused of negligence if it did nothing. So far, this interpretation has held up. Although public criticism of evacuations may occur after the fact, no examples have yet been found by this writer where fire agencies were held liable for actions during evacuations.

There is reticence among some police agencies to publicly designate evacuation routes ahead of time because wildfires are dynamic, and injury or death may result if pre-designated routes lead to danger rather than escape (Hills Emergency Forum 2002). In many communities however, maps are included in fire-preparedness brochures indicating major arterials and alternatives, and advising residents to follow the instructions of local officials during an actual event (e.g. Tuolumne County 2002; Shingletown Ridge 2002). In the face of increased national attention to homeland security, local hazard mitigation planning is accelerating and evacuation routes are being identified and mapped for different contingencies.

## Discussion

Several key elements are critical to a safe and effective evacuation:

1. **Multi-Agency Pre-Planning:** Coordinated planning across all concerned agencies is essential. Incident Evacuation Plans spell out authorities, jurisdictions, trigger points at which actions will be taken, communications, traffic management, temporary shelter locations for humans and animals, and other key elements ahead of time. Bringing law and fire agencies together beforehand is important for preventing freelancing and independent action during the crisis atmosphere of a fast moving fire. Tabletop exercises identify weak points before the real event occurs.
2. **Public education on fire hazards and personal responsibility:** This requires a concerted multi-media public outreach campaign to residents and visitors before fires occur. Brochures, web tips, neighborhood contacts, postings in markets, tourist facilities, town meetings and school sessions are all means to contact local residents ahead of time, informing them of fire risks and what to do in the event of evacuation. The California Fire Safe Council program and Firewise workshops offer models for extending education and developing grassroots constituencies for fire-safe communities.
3. **Fuels reduction and fire-safeing structures:** Statutory requirements for building standards, road widths, water supplies and fuel clearances in high fire risk zones help protect structures. Periodic enforcement inspections of fire-safe clearances can be accompanied with evacuation instructions, locations of safe gathering points, and tips on how to leave your house and what to take with you.

## Conclusion

There is no single answer whether staying or leaving is the better strategy during a wildfire. The outcome rests on such factors as:

- The aggressiveness of fire behavior
- The fire-safe characteristics of the structure and surroundings
- The degree of preparation by the homeowner
- The degree of pre-planning by local officials
- Confidence of homeowners in their ability to defend their property
- Equipment and water supply available to homeowners
- Public expectations of what firefighters can do
- The number of firefighting resources available, and the need to rely on citizen firefighters
- The need to protect firefighters from “late deciders” and egress traffic
- The ability of the road network to accommodate the peak evacuation traffic flows without becoming gridlocked

It appears that Australia and the US start at opposite ends of the spectrum, but in some instances tend to merge. The Australian “prepare, stay and defend” model places primary decision responsibility on residents, but if the situation becomes severe enough, as in the Canberra and Sydney fires of 2002, the fire authority may step in to order active evacuation. It appears that the effort invested in the Australian policy debate has created a strong body of public understanding regarding the role of the individual in protecting one’s property, which well exceeds that of most US residents. However the lesser emphasis on evacuation may contribute to some confusion as residents delay their decision to leave, change their mind as the fire approaches, or take their families out and then return to wage a defense (Saunders 1998; Brennan 1998). As noted by Launie (2001), while it is one thing for a resident to decide to shelter in place on a clear sunny day, “... it is quite another thing to stand your ground when the embers start flying through the air and the smoke turns the day into night. Many people will take one look and then jump into the car and try to get out of Dodge City.”

It is last-minute decision-making that aggravates confusion. Fire professionals on the fire line know more about fire behavior than most residents, and their judgment should be respected and exercised. Reliance on evacuation may err on the conservative side of protecting lives at the expense of losing property that perhaps could have been saved. It remains a matter of cultural setting, public attitudes towards risk, and political will as to the relative priority placed upon self-defense versus evacuation as a public policy.

Evacuation is not a contentious policy issue in the US. Although there may be disgruntled individuals in specific instances, in general the deliberate approach of institutionalizing evacuation procedures is accepted. Once it is explained that homeowners may stay, compliance is substantial. Clearly the intent of a mandatory evacuation is to get as many to leave as possible, and when there is time, two-stage alerts, voluntary and mandatory, help to phase departure and protect incoming firefighters. Following the western firestorms of the past three years there has been more experience in evacuations, and implementation is becoming more effective. However, far more national attention is now focused on fuels reduction and augmenting suppression resources than on evacuation policy.

Interestingly, the county of Los Alamos, New Mexico, where the national nuclear laboratory was frighteningly threatened by the Cerro Grande firestorm of 2000, has just announced that they are advocating a “shelter in place” strategy this season rather than evacuation (Los

Alamos National Laboratory, 2003). Aggressive thinning and salvage of burned timber has treated the flats and mesa tops surrounding the community, but has not yet been conducted in the canyons, creating a scenario that makes mass evacuation unsafe. Fires are anticipated to be small, short and hot in the canyons, calling for a different kind of response compared to the earlier condition when thousands of acres were burning in the surrounding forests. Parents are being asked to leave their children at school and not clog the roads trying to retrieve them.

Few areas in the wildland-urban interface however enjoy this degree of fire preparedness. Most western forests are still overstocked, and most home sites still have inadequate clearance. Fire behavior driven by topography and wind will override most of the modest fuel reduction steps taken so far, leaving the US still reliant on evacuation as a tool.

A real-time example of evacuation planning for the 350,000 acre (140,000 ha) bark beetle and drought-killed pine forests of San Bernardino, Riverside and San Diego counties will be presented as an example of an aggressive multi-agency response to potential conflagration. Thousands of structures and hundreds of thousands of residents and tourists are threatened by millions of standing dead trees. Narrow roads, dense homesites, tangles of electric lines and lack of markets for wood waste set up a potential disaster, which only aggressive evacuation planning can help to minimize.

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