

Letter I29b

July 28, 2014

To: Mark Slovick, San Diego County Project Manager

Project: Lilac Hills Ranch

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 3600 12-003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (MUP), 3500 12-017 (STP), 3500 12-018 (STP)

Dear Mr. Slovick,

I have questions and concerns regarding evacuation of the Lilac Hills Ranch development and surrounding residents in the event of a wildfire or wildfires in the area. They are as follows:

- 1) In the event there is a wildfire that is west of the development, along old highway 395 and traveling east as happened this year, how long would it take to evacuate the all of the residents 1 mile east of I-15 including the LHR development, given that 80% of the development (at full capacity) have not previously evacuated:
  - a) Utilizing W. Lilac across the bridge over I-15 and Circle R:
    - i) If I-15 northbound is closed at Highway 76?
    - ii) If I-15 northbound is closed at Old 395 and I-15?
    - iii) If I-15 northbound is closed at Highway 76 and W Lilac, west of old 395 is also closed?
    - iv) If I-15 southbound is closed at Highway 78?
    - v) If I-15 southbound is closed at Deer Springs Rd?
    - vi) If I-15 southbound is closed at Gopher Canyon Rd?
    - vii) If I-15 southbound is closed at Old 395 and I-15?
    - viii) If W. Lilac is the only westerly route available as I-15 is closed in both directions?
    - ix) If W. Lilac is the only westerly route available as Old 395 is closed in both directions?
    - x) If W. Lilac is the only westerly route available as Old 395 and I-15 is closed in both directions?
    - xi) If Gopher Canyon is the only westerly route available as I-15 is closed in both directions above and below Gopher Canyon?
    - xii) If Camino Del Rey is the only westerly route available off Old 395 as I-15 is closed in both directions from Old 395?
  - b) If W. Lilac heading east and closed at Circle R Rd is the only easterly route available?
  - c) If all LHR residents have to exit via Mountain Ridge Rd and the only easterly route available is W. Lilac to Valley Center?

I29b-1

I29b-2

I29b-1 This comment is an introduction to comments that follow. Detailed responses are provided below.

I29b-2 The adequacy of fire and emergency response service is evaluated in Chapter 2.0, subchapter 2.7.2.4 of the FEIR and Appendices J (Fire Protection Plan) and K (Evacuation Plan). The project's Evacuation Plan (Appendix K of the FEIR), includes multiple components intended to create an orderly and safe evacuation of the project site in time of emergency such as details of evacuation routes, evacuation points, and specific measures to keep future residents and employees informed and safe if wildfire occurs.

As discussed in subchapter 2.7, the primary evacuation routes are through a series of internal roadways with the development, which in turn permits direct emergency evacuations to the north, south, east, and west to accommodate pending wildfire conditions. As shown on Figure 2.7-3, evacuation routes include Main Street, Street "Z," Lilac Hills Ranch Road, Covey Lane, and Mountain Ridge Road. The project site would also be served by secondary emergency evacuation routes using Street "F" and Birdsong Drive on the north and Rodriguez Road in the southern Senior Neighborhood (refer to subchapter 2.7 Figure 2.7-3). There is also potential to coordinate with the DSFPD and the San Diego County Water Authority to utilize Nelson Way, to the west, in the event of an emergency situation.

The Evacuation Plan is designed to allow adjustments to the plan throughout each phase of construction. The plan provides that as each phase of construction is completed, fire and law enforcement officials would be given the opportunity to review the plan to assure its adequacy and with each phase, the evacuation routes may be subject to changes, as deemed necessary by fire and/or law enforcement officials.

The Evacuation Plan includes a resident awareness and education program in coordination with the Deer Springs Safety Council. The Plan also requires the implementation of a program known as "Ready, Set, Go." The focus of the program is on the public's awareness and preparedness especially for those living in the wildland-urban interface areas. The program is designed to incorporate the local fire protection agency as part of the training and education process in order to ensure that the information is disseminated to those subject to the impact from a wildfire.

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d) If all LHR residents have to exit via Mountain Ridge Rd and the only easterly route available is W. Lilac to Valley Center? If all LHR residents have to exit via Mountain Ridge Rd and the only easterly route available is W. Lilac to Valley Center?

e) If all LHR residents have to exit via Mountain Ridge Rd and the only route available is Circle R through Gopher Canyon?

f) What is the evacuation plan for the senior 200 bed facility?

g) Will additional evacuation notice be given due to the senior housing in Phase 5?

2) In the event there is a wildfire following and encompassing the San Luis Rey River and Moosa Creek, in that those residing in Bonsall between the Vessel's Ranch and Moosa Creek traveling east and southeast, how long would it take to evacuate the all of the residents and those 1 mile east of I-15 including the LHR development, given that 80% of the development (full residency/capacity) have not previously evacuated:

a) Utilizing W. Lilac across the bridge and Circle R:

- i) If I-15 northbound is closed at Highway 76?
- ii) If I-15 northbound is closed at Old 395 and I-15?
- iii) If I-15 northbound is closed at Highway 76 and W Lilac, west of old 395 is also closed?
- iv) If I-15 southbound is closed at Highway 78?
- v) If I-15 southbound is closed at Deer Springs Rd?
- vi) If I-15 southbound is closed at Gopher Canyon Rd?
- vii) If I-15 southbound is closed at Old 395 and I-15?
- viii) If W. Lilac is the only westerly route available as I-15 is closed in both directions?
- ix) If W. Lilac is the only westerly route available as Old 395 is closed in both directions?
- x) If W. Lilac is the only westerly route available as Old 395 and I-15 is closed in both directions?
- xi) If Gopher Canyon is the only westerly route available as I-15 is closed in both directions above and below Gopher Canyon?
- xii) If Camino Del Rey is the only westerly route available off Old 395 as I-15 is closed in both directions from Old 395?

b) If W. Lilac heading east is the only easterly route available?

c) If Circle R Rd to W. Lilac heading east is the only easterly route available?

d) If all LHR residents have to exit via Mountain Ridge Rd and the only easterly route available is W. Lilac to Valley Center?

e) If all LHR residents have to exit via Mountain Ridge Rd and the only route available is Circle R through Gopher Canyon?

I29b-2  
cont.

I29b-3

I29b-2 (cont.)  
Through implementation of the project design features included in the Evacuation Plan, the FEIR determined that impacts associated with the adequacy of an evacuation process would be less than significant.

Determining the actual amount of time it would take to evacuate residents, as requested in the comment, would not be feasible because evacuation efficiency depends on various factors such as the amount of lead time that is available for emergency responders to request evacuation, evacuation compliance among residents once orders are given, and timeliness of response. Such an analysis would be speculative to include in the FEIR due to the numerous factors and conditions. Evacuation of the group care (assisted living) facility would occur using the same evacuation routes as the remainder of the project. However, evacuation of a group care facility would pose unique challenges that would need to be specifically addressed when a specific facility is proposed for this site. As this use would be subject to future approval of Use Permit, additional site-specific evacuation planning would occur during future permitting. While the specifics of the evacuation plan for the group care facility would be determined at a later date, the project analysis identifies adequate ingress and egress for safe evacuation as detailed in this response and further detailed in Global Response: Fire and Medical Services.

I29b-3 As stated above, determining the actual amount of time it would take to evacuate residents, as requested in the comment, would not be feasible because evacuation efficiency depends on various factors such as the amount of lead time that is available for emergency responders to request evacuation, evacuation compliance among residents once orders are given, and timeliness of response. While CEQA requires some degree of forecasting, it does not require an exhaustive evaluation of every possible scenario to the point it would be considered speculative. As a result, an analysis of the various evacuation scenarios included in the comment is not provided in the FEIR. Evacuation plans for the future group care facility in Phase 5 is addressed in response to comment 128b-2.

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RESPONSE

- f) What is the evacuation plan for the senior 200 bed facility?
- g) Will additional evacuation notice be given due to the senior housing in Phase 5?

I29b-3  
cont.

3) In the event there is a wildfire that is west of the development, along old highway 395 and traveling east as happened this year, how long would it take to evacuate the all of the residents 3 miles east of I-15 including the LHR development, given that 80% of the development (at full capacity) have not previously evacuated:

- a) Utilizing W. Lilac across the bridge over I-15 and Circle R:
  - i) If I-15 northbound is closed at Highway 76?
  - ii) If I-15 northbound is closed at Old 395 and I-15?
  - iii) If I-15 northbound is closed at Highway 76 and W Lilac, west of old 395 is also closed?
  - iv) If I-15 southbound is closed at Highway 78?
  - v) If I-15 southbound is closed at Deer Springs Rd?
  - vi) If I-15 southbound is closed at Gopher Canyon Rd?
  - vii) If I-15 southbound is closed at Old 395 and I-15?
  - viii) If W. Lilac is the only westerly route available as I-15 is closed in both directions?
  - ix) If W. Lilac is the only westerly route available as Old 395 is closed in both directions?
  - x) If W. Lilac is the only westerly route available as Old 395 and I-15 is closed in both directions?
  - xi) If Gopher Canyon is the only westerly route available as I-15 is closed in both directions above and below Gopher Canyon?
  - xii) If Camino Del Rey is the only westerly route available off Old 395 as I-15 is closed in both directions from Old 395?
- b) If W. Lilac heading east and closed at Circle R Rd is the only easterly route available?
- c) If all LHR residents have to exit via Mountain Ridge Rd and the only easterly route available is W. Lilac to Valley Center?
- d) If all LHR residents have to exit via Mountain Ridge Rd and the only easterly route available is W. Lilac to Valley Center? If all LHR residents have to exit via Mountain Ridge Rd and the only easterly route available is W. Lilac to Valley Center?
- e) If all LHR residents have to exit via Mountain Ridge Rd and the only route available is Circle R through Gopher Canyon?
- f) What is the evacuation plan for the senior 200 bed facility?
- g) Will additional evacuation notice be given due to the senior housing in Phase 5?

I29b-4

I29b-4 through I29b-7  
Refer to response to comments 129b-2 and 129b-3 above.

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4) In the event there is a wildfire following and encompassing the San Luis Rey River and Moosa Creek, in that those residing in Bonsall between the Vessel's Ranch and Moosa Creek traveling east and southeast, how long would it take to evacuate the all of the residents and those 3 miles east of I-15 including the LHR development, given that 80% of the development (full residency/capacity) have not previously evacuated:

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  - i) If I-15 northbound is closed at Highway 76?
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  - iv) If I-15 southbound is closed at Highway 78?
  - v) If I-15 southbound is closed at Deer Springs Rd?
  - vi) If I-15 southbound is closed at Gopher Canyon Rd?
  - vii) If I-15 southbound is closed at Old 395 and I-15?
  - viii) If W. Lilac is the only westerly route available as I-15 is closed in both directions?
  - ix) If W. Lilac is the only westerly route available as Old 395 is closed in both directions?
  - x) If W. Lilac is the only westerly route available as Old 395 and I-15 is closed in both directions?
  - xi) If Gopher Canyon is the only westerly route available as I-15 is closed in both directions above and below Gopher Canyon?
  - xii) If Camino Del Rey is the only westerly route available off Old 395 as I-15 is closed in both directions from Old 395?
- b) If W. Lilac heading east is the only easterly route available?
- c) If Circle R Rd to W. Lilac heading east is the only easterly route available?
- d) If all LHR residents have to exit via Mountain Ridge Rd and the only easterly route available is W. Lilac to Valley Center?
- e) If all LHR residents have to exit via Mountain Ridge Rd and the only route available is Circle R through Gopher Canyon?
- f) What is the evacuation plan for the senior 200 bed facility?
- g) Will additional evacuation notice be given due to the senior housing in Phase 5?

I29b-5

5) In the event there is a wildfire that is in the eastern portion of Valley Center, as has happened many times, how long would it take to evacuate the all of the residents 1 mile east of I-15 including the LHR development, given that 80% of the development (at full capacity) have not previously evacuated:

I29b-6

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RESPONSE

- a) Utilizing W. Lilac across the bridge over I-15 and Circle R:
  - i) If I-15 northbound is closed at Highway 76?
  - ii) If I-15 northbound is closed at Old 395 and I-15?
  - iii) If I-15 northbound is closed at Highway 76 and W Lilac, west of old 395 is also closed?
  - iv) If I-15 southbound is closed at Highway 78?
  - v) If I-15 southbound is closed at Deer Springs Rd?
  - vi) If I-15 southbound is closed at Gopher Canyon Rd?
  - vii) If I-15 southbound is closed at Old 395 and I-15?
  - viii) If W. Lilac is the only westerly route available as I-15 is closed in both directions?
  - ix) If W. Lilac is the only westerly route available as Old 395 is closed in both directions?
  - x) If W. Lilac is the only westerly route available as Old 395 and I-15 is closed in both directions?
  - xi) If Gopher Canyon is the only westerly route available as I-15 is closed in both directions above and below Gopher Canyon?
  - xii) If Camino Del Rey is the only westerly route available off Old 395 as I-15 is closed in both directions from Old 395?
- b) If W. Lilac heading west (and Circle R Rd is closed) is the only westerly route available?
- c) If all LHR residents have to exit via Mountain Ridge Rd and the only westerly route available is west through Gopher Canyon?
- d) If all LHR residents have to exit via Mountain Ridge Rd and the only westerly route available is Camino Del Rey?
- e) What is the evacuation plan for the senior 200 bed facility?
- f) Will additional evacuation notice be given due to the senior housing in Phase 5?

I29b-6  
cont.

6) In the event there is a wildfire that is in the eastern portion of Valley Center, as has happened many times, how long would it take to evacuate the all of the residents 3 miles east of I-15 including the LHR development, given that 80% of the development (at full capacity) have not previously evacuated:

I29b-7

- a) Utilizing W. Lilac across the bridge over I-15 and Circle R:
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  - ii) If I-15 northbound is closed at Old 395 and I-15?
  - iii) If I-15 northbound is closed at Highway 76 and W Lilac, west of old 395 is also closed?
  - iv) If I-15 southbound is closed at Highway 78?
  - v) If I-15 southbound is closed at Deer Springs Rd?

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- vi) If I-15 southbound is closed at Gopher Canyon Rd?
- vii) If I-15 southbound is closed at Old 395 and I-15?
- viii) If W. Lilac is the only westerly route available as I-15 is closed in both directions?
- ix) If W. Lilac is the only westerly route available as Old 395 is closed in both directions?
- x) If W. Lilac is the only westerly route available as Old 395 and I-15 is closed in both directions?
- xi) If Gopher Canyon is the only westerly route available as I-15 is closed in both directions above and below Gopher Canyon?
- xii) If Camino Del Rey is the only westerly route available off Old 395 as I-15 is closed in both directions from Old 395?
- b) If W. Lilac heading west (and Circle R Rd is closed) is the only westerly route available?
- c) If all LHR residents have to exit via Mountain Ridge Rd and the only westerly route available is west through Gopher Canyon?
- d) If all LHR residents have to exit via Mountain Ridge Rd and the only westerly route available is Camino Del Rey?
- e) What is the evacuation plan for the senior 200 bed facility?
- f) Will additional evacuation notice be given due to the senior housing in Phase 5?

I29b-7

It was very evident from the fire a few months ago that W Lilac bridge was severely impacted, with a bottle neck formed which delayed residences from evacuating in a timely manner. Please take past congestion, road and highway closures during wildfire evacuations into consideration and please respond to my questions as the most recent fire and past fires have significantly impacted us.

I29b-8

Respectfully,

William R. Ewing  
 9741 Adam Ct  
 Escondido, CA 92026  
 760 749-3711

I29b-8 Chapter 2.0, subchapter 2.7.2.4 of the FEIR and Appendices J (Fire Protection Plan) and K (Evacuation Plan) address potential impacts from wildfire and emergency response. The County acknowledges your concerns and your 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.