



San Diego County Fire Chiefs Association Fire Prevention Officers Section

January 5, 2009

General Plan Update, DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123

Comments: Fire Districts -Fire Marshal comments on the San Diego County draft General Plan

The following are areas that need to be address in more detail which we believe will assist in planning tools for fire protection in San Diego County.

Chapter 3 Land Use Element

Policies LU-13.1 and LU-13.2 plan to *coordinate land use planning with Fire Protection and domestic water infrastructure planning to maintain an acceptable availability of a high quality water supply and require new development to identify adequate water resources to support the development prior to approval. Well water may not be adequate in years to come.* When is a proposed development outside of a water district or company required to install a water system as a condition of the project's approval? The water system should include firefighting water duration, domestic use, outside water needs and emergency standby water based on lot size or density and recognized firefighting standards (NFPA, California Fire Code etc)? TPM or TM? A water system is always preferred over individual wells and storage tanks—water systems provide a greater quantity of water and individual water tanks cannot be relied upon to always be filled. As development continues in the backcountry, coupled other conditions such as an extended drought, the aquifers of the County might not be able to support the increased development, leaving areas with no water supply to suppress fires.

Chapter 4 Mobility Element

M-3.3 Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes whenever feasible required in conformance with State law, the Fire Code, and the Safety Element. (Pg 4-14)

Mobility policy M-4.4 requires: *Design and construct public and private roads to allow for necessary access for fire apparatus and emergency vehicles accommodating outgoing vehicles from evacuating residents.* Does this include a requirement that all new public and private roads be paved? Current private road standards allow for an exemption to the paving requirement for some land use designations, which has allowed for much of the County's fire apparatus access roads to be lacking in an adequate all-weather surface.



San Diego County Fire Chiefs Association Fire Prevention Officers Section

We would like to see the exemption to paving be removed from the road standard. 15 of the 16 fire protection districts in the County have attempted to fix this problem through their fire code by requiring all fire apparatus access roads be paved.

Chapter 7 Safety Element

Figure S-1 - The Fire Hazard Map labeled as Figure S-1 appears to be out of date and should be replaced with the most recent Fire Hazard Map using a 2007 or 2008 data set.

Safety policy S-6.3 would require new development to make a fair share contribution for the provision of fire and emergency services. However, this contribution can only be for capital projects and not for ongoing operation and maintenance costs.

Policy LU-12.2 on page 3-38 would also require new development to maintain (and not degrade) existing service levels. How would operation and maintenance costs for fire and emergency services be funded? At best, policy S-6-3 is unclear with respect to funding for ongoing costs. Therefore, the County should amend the policy to include an explicit provision for funding ongoing costs for fire and emergency services so that service levels for existing developed areas would not be degraded.

Policy S-6.4 states:

Require that development demonstrate that fire services can be provided that meet the minimum travel times identified in Table S-1 (Travel Time Standards).

Travel times, even though they are used in the Existing General Plan, are not the appropriate measurement for fire protection services. The appropriate measurement is **response times**, which are described on page 7-7. Travel times do not include 'reflex' time (the time from when the 911 call is received to when the fire engine leaves the station, note reflex times can vary from 2 to 5 minutes depending on the agency responding.). Therefore, there is no way to determine if the travel time will meet the intended purpose described in Table S-1. Please revise policy S-6.4 and Table S-1, working in conjunction with the fire service to achieve the intended purpose, using response times.

As defined in the Consolidated Fire Code **RESPONSE TIME**. The elapsed time from the fire department's receipt of the first alarm to when the first fire unit arrives at the scene.

The Fire section of the Safety Element should include an exhibit showing the preferred locations of future fire stations based on future population growth. Station locations would not be parcel specific, but instead indicate a general location using response times from the station to population centers.



San Diego County Fire Chiefs Association Fire Prevention Officers Section

Additionally, the current fire stations (all fire stations, city, fire district, volunteer federal state etc.) and any projected fire stations should also be mapped so as to reduce any conflicts' in station locations, example, and fire station across the street from each other.

Moreover, in the grey text box following Policy S-6.4 it states: *“Fire stations must be staffed year-round, publicly supported, and committed to providing service. These do not include volunteer stations, seasonal fire stations, and stations that are not obligated by law or agreement to automatically respond to an incident.”* There are many volunteer stations that are staffed year-round, publicly supported and committed to providing service. This is true of many seasonal stations as well—the County has contracts with CAL FIRE to keep many “seasonal” stations staffed year-round. The first sentence in the above quotation should remain, and the second sentence should be deleted. It should provide for exception based on current situation.

Access/Egress Routes: ~~Multiple access/egress routes are desirable. Where such multiple routes are unavailable or infeasible, design, construction, and fuel management should be considered to achieve the overall same practical affect.~~ Require development to include multiple access/egress routes when necessary to ensure adequate fire safety (Page 7-7)

Travel Time Standards: The minimum travel time standards to respond to a fire hazard or medical emergency facilitate the ability to identify future fire facility needs and to determine public service requirements for proposed development. Travel time standards indicate that expectations for service levels are different in urbanized areas than in rural areas. (Page 7-7)

Multi-Story Structural Fires: The ability of rural fire protection districts to safely fight structural fires above ~~three~~ two-stories is an issue in rural locations when higher density multi-family residential developments are needed to provide affordable housing or alternate housing types, since the rural fire protection districts simply do not have the resources to fight multi-story structure fires. (Page 7-7)

Goals and Policies

S-3.3 Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by limiting pockets, peninsulas, or islands of flammable vegetation within a development. Pockets, peninsulas & islands of flammable vegetation should not be allowed in a development. (Pg 7-8)

S-3.5 Secondary Access. Require development to include secondary access when necessary to ensure adequate fire safety. ~~Where multiple routes are unavailable or infeasible in development, ensure that the same practical affect is achieved through site design, construction, and fuel management.~~ (Pg 7-8) Note: The same practical effect is not possible when comes to secondary access.



San Diego County Fire Chiefs Association Fire Prevention Officers Section

S-3.6 Mitigation Fire Protection Measures. Ensure that development located within ~~high to extreme~~ fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire. (Pg 7-8)

GOAL S-4

Managed Fuel Loads. Managed fuel loads, including ornamental and ~~wildland~~ combustible vegetation, ~~in areas of wildland/urban interface.~~ (Page 7-8)

COS-23: Add a policy:

CS-23.4 Public Safety Involvement. Coordinate with public safety agencies to address safety concerns. (Page 5-39)

If you have any further questions please feel free to contact ma at 858-756-6040 or email at hunter@rsf-fire.org.

Respectfully submitted on behalf of the Fire District Fire Marshals,

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CC: Fire Districts: Alpine, Bonita-Sunnyside, Deer Springs, Lakeside, North County, Rancho Santa Fe, San Marcos, San Miguel, Valley Center, Vista.