



# ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

December 5, 2018

*VIA ELECTRONIC MAIL*

Department of Planning and Development Services  
 ATTN: Kevin Johnston, Gregory Mattson, Mark Slovick, Ashley Smith  
 5510 Overland Ave, Third Floor  
 San Diego, CA 92123

**RE: Otay Ranch Villages 14 and Planning Areas 16 & 19  
 Otay Ranch Village 13  
 Lilac Hills Ranch  
 Warner Ranch  
 Property Specific Requests**

Dear Ms. Smith, Mr. Slovick, Mr. Johnston, and Mr. Mattson:

Endangered Habitats League (EHL) hereby submits additional comments into the administrative records for the above-referenced projects. With the recently approved (Newland Sierra, Harmony Grove Village South, Valiano, Otay 250 projects) and additional proposed major general plan amendments, the County of San Diego would substantially increase the amount of new development—and add about 40,000 people—within high fire hazard locations. As this and last year’s tragic wildfires in northern and southern California make clear, residential development in the wildland urban interface and within high fire hazard severity zones is a recipe for disaster. We ask that the County halt consideration of the above projects until each project’s fire safety analysis is updated to analyze the lessons from the recent disastrous fires.

## **Communities Cannot Rely on Phased Evacuations to Save Lives.**

Certain of the County’s proposed projects call for a phased approach to evacuation. The recent Camp Fire, with great and tragic loss of life in the town of Paradise, demonstrates that phased evacuation plans cannot be relied upon. In disaster situations, warning systems fail and roads gridlock.

After a wildfire tore through Paradise in 2008, authorities put together a detailed plan, hoping to make emergency evacuations swift and orderly, with residents leaving according to their neighborhoods. But Paradise’s carefully laid plans quickly devolved into a panicked exodus on November 8th (*AP*, Nov 15, 2018).<sup>1</sup> The fire simply moved too fast. “The fire had already outrun us,” said John Messina, California Department of

<sup>1</sup> Copies of each of the articles discussed in this letter are at [https://www.dropbox.com/sh/4e3m8d37crxt24b/AAD\\_all-uDg8GCI9XjYMJugVa?dl=0](https://www.dropbox.com/sh/4e3m8d37crxt24b/AAD_all-uDg8GCI9XjYMJugVa?dl=0) and will be sent to Mr. Slovick for distribution as a thumb drive. Individual links are also attached.

Fire and Forestry Protection battalion chief for Butte County (*NY Times*, Nov 11, 2018; *LA Times*, Nov 14, 2018). The bodies of several people were found “in vehicles that were overcome” by the flames, Sheriff Kory L. Honea of Butte County said, adding that they had been so badly burned, they could not immediately be identified (*NY Times*, Nov 9, 2018).

Evacuation planning was not an oversight in Paradise. The mayor, Jody Jones, worked for years as a regional manager for the California Department of Transportation. Traffic management is her specialty. The town held evacuation drills. Ms. Jones explained that no amount of planning could have prevented the panicked gridlock in Paradise. (*NY Times*, Nov. 12, 2018). Yet the County is relying on precisely the same kind of evacuation planning as the rationale for placing tens of thousands of people in harm’s way. This wishful thinking approach to fire is potentially catastrophic. As of this writing, the Camp Fire alone is known to have claimed 88 lives, with 25 people still missing.

### **Despite the Deadly Fires in 2017 and 2018, Agencies Continue to Rely on Outdated Warning Systems.**

Disaster after disaster, California keeps falling short on evacuating people from wildfires (*LA Times*, Nov. 20, 2018). In a comprehensive look at the Woolsey (Malibu), Paradise, and Tubbs (Sonoma) fires, the Los Angeles Times found pervasive failures of warning, telephone alert, and evacuation systems. Due to outdated or flawed warning systems, only a fraction of people living near the Camp Fire received alerts or evacuation orders from local authorities. “In the town of Paradise, I think we’d be lucky to say 25% or 30%” of phone lines are in the system” (*LA Times*, Nov 14, 2018; November 20, 2018).

### **Fire Hardening, Defensible Space, and Shelter-In-Place Cannot Protect Against Firestorms.**

Reliance upon hardening of homes is foolhardy. In the Tubbs fire, houses that were built to current fire codes burned. According to a former Sonoma County planning director and past president of the California chapter of the American Planning Association,

The WUI standards for new buildings increase the odds of a building surviving a wildfire, but relying on a hardened structure to protect whole communities in a known fire-prone area is the height of hubris and callousness . . . The lesson is that we cannot engineer our way out of every hazard (*APA Northern News*, Oct. 2018).

Given the fact that the Woolsey Fire (Malibu) jumped the 101 Freeway like hopscotch, it is magical thinking to believe that defensible space around structures will keep a wind-driven fire out. Yet consultants for developers brazenly promulgate the myth that this prudent but limited measure plus structure hardening can actually ensure safety

from firestorms. County staff routinely accept deeply flawed traffic studies which paint unrealistically optimistic chances of safe evacuation while disregarding criticisms of these studies prepared by licensed transportation engineers. Worse, the County does not even employ licensed fire protection engineers to prepare the fire “protection” plans included in its EIRs.

### **Limiting Development in High Risk Fire Zones Is the Only Solution.**

Even if alerts overcome the technical problems, fire officials often face a no-win choice: issue a narrowly targeted alert and leave people at risk of events overtaking them, or issue a broad alert and cause certain gridlock. There is no safe approach other than limiting the number of people in danger in the first place.

Increasingly, and justifiably, development decisions by local government officials are blamed. California’s deadly wildfires have a straightforward solution, experts say: stop building homes in places that are likely to burn — and make homes that already exist in those areas a whole lot tougher (*Bloomberg News*, Nov. 14, 2018). “It’s a land-use issue,” said Alice Hill, a senior adviser for climate resilience to President Barack Obama. Without so many homes being constructed in vulnerable areas at the edge of the forest, “we would still have the fires. But we wouldn’t have this kind of devastation” (*Bloomberg News*, Nov. 14, 2018).

Some experts suggest that a state commission, much like the California Coastal Commission, should be created that would have authority over new development in hazardous fire zones (*LA Times* editorial, Nov 25, 2018).

The fact is that today’s strategy of embracing risk has failed. And it will fail again. Pete Parkinson, AICP, concludes that,

As planners and as local government decision makers, we thought we had adequately anticipated the hazards and had planned accordingly. We were wrong.

As emergency responders (and like almost every public employee), we trained and exercised for scenarios we thought were “worst case.” We were wrong about that too.

What happened in the North Bay fires last October exceeded everyone’s vision and prudence, and we’ve seen similar catastrophes play out up and down the state since then. We have been given severe lessons on the risks of putting ever more people in harm’s way. Those lessons need to work their way into our General Plans, zoning, and everyday planning practice — and soon. (*APA Northern News*, Oct. 2018).

Despite all that these human disasters teach us, San Diego County remains with its head woefully buried in the sand. Apparently, nothing ever goes contrary to a rosy, best-case scenario in San Diego. In response to the Board of Supervisor’s questions during a public hearing, the fire chief touted phased evacuations and portrayed them as infallible. “No one has died,” he repeats. Actually, no one has died *until they do*.

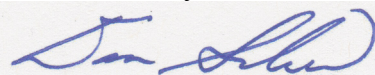
Similarly, CalFire’s Jon Heggie believes that San Diego is immune from evacuation chaos and that they have as much control over the vagaries of nature, wind, smoke, and traffic as an orchestra conductor: “It’s a well-orchestrated dance, so to speak,” he said, “between us and our law enforcement partners to be able to do these evacuations in a timely manner” (KPBS, Nov 20, 2018). Overconfidence—and it is indeed hubris that dominates current County (and CalFire) thinking—has no place in ensuring public safety.

Apparently, no one wants to “say no” to a housing developer. The County is now overtly relying on untenable shelter-in-place evacuation scenarios instead of recognizing that the inability to evacuate should mean *project denial*. Would you tell your family to shelter-in-place during a terrifying wind-driven fire when smoke and chaos have made evacuation impossible? In Paradise, people abandoned their cars and ran.

It is long past time to for San Diego County to practice *responsible* land use planning. For reasons of topography, surrounding wildlands, wind patterns, and fire history, many parts of the County are simply too dangerous to build in, at anywhere near the densities associated with the GPAs before you. These locations have been identified by CalFire already and can be further refined.

We ask that the County halt consideration of the above projects until each project’s fire safety analysis is updated to analyze the lessons from this and last year’s disastrous fires. The County must completely reexamine fire safety issues in light of present knowledge. Your number one duty is to public safety.

Yours truly,



Dan Silver, MD  
Executive Director

cc: Board of Supervisors  
San Diego County Fire Authority  
CalFire  
Sara Aghassi, LUEG  
Mark Wardlaw, DPDS  
San Diego Union-Tribune  
inewssource  
KPBS  
Voice of San Diego  
Los Angeles Times

## Attachments

Staggered evacuation plan questioned in California wildfire's aftermath

<https://www.bostonglobe.com/news/nation/2018/11/15/staggered-evacuation-plan-questioned-california-wildfire-aftermath/iWANGQZLPXF9SKK4raCKI/story.html>

Forced Out by Deadly California Fires, Then Trapped in Traffic, The New York Times, November 11, 2018

<https://www.nytimes.com/2018/11/11/us/california-fire-paradise.html?smid=nytcore-ipad-share&smprod=nytcore-ipad>

As California's deadliest wildfire closed in, evacuation orders were slow to arrive

<https://www.latimes.com/local/lanow/la-me-paradise-fire-evacuations-20181114-story.html>

'The Whole World Was on Fire': Infernos Choke California, Piling On the Grief

<https://www.nytimes.com/2018/11/09/us/california-fires.html>

California Today: Camp Fire Matches Deadliest Fire in State History

[https://www.nytimes.com/2018/11/12/us/california-today-paradise-camp-fire.html?em\\_pos=large&emc=edit\\_ca\\_20181112&nl=california-today&nid=15762734edit\\_ca\\_20181112&ref=headline&te=1](https://www.nytimes.com/2018/11/12/us/california-today-paradise-camp-fire.html?em_pos=large&emc=edit_ca_20181112&nl=california-today&nid=15762734edit_ca_20181112&ref=headline&te=1)

Disaster after disaster, California keeps falling short on evacuating people from harm's way

<https://www.latimes.com/local/lanow/la-me-paradise-fire-evacuation-system-20181120-story.html>

Third body found among wreckage of Woolsey fire as residents blast officials about emergency response

<https://www.latimes.com/local/lanow/la-me-ln-woolsey-fire-response-20181114-story.html>

We came, we planned, we were wrong

<https://norcalapa.org/wp-content/uploads/2017/06/Oct18.pdf#page=2>

California's Wildfire Epidemic Blamed On Bad Building Decisions

<https://www.bloomberg.com/news/articles/2018-11-14/california-s-wildfire-epidemic-blamed-on-bad-building-decisions>

Rebuild Paradise? California has to reconsider putting homes in the path of more dangerous fires

<https://www.latimes.com/opinion/editorials/la-ed-wildfire-rebuild-20181124-story.html>

Wildfire Fatalities Spark Fears About Recent Land Use Decisions In San Diego

<https://www.kpbs.org/news/2018/nov/20/camp-fire-fatalities-spark-fears-about-recent-land/>