

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter No. PCI8</p> <p>Harmony Grove Village South - The Illogic of Shelter in Place</p> <p>The developers “experts” have apparently taken literary license with the terms “Fire Resistive” and now “Fire Resistant.” To consider a 330 person Shelter-in-Place facility using the expected building materials, regardless of interior fire sprinkler protection is simply folly. According to all recognized national sources, there is no classification of “fire resistant” for buildings within the National Fire Codes (NFPA), Insurance Services Office (ISO) or International Building Code (IBC).</p> <p>Standard building classifications are on a numerical scale from 1 to 6, with 1 being the lowest in terms of fire resistance and 6 being the highest. Even the fully automatic fire sprinklered high-rise buildings are usually rated at Class 5 (Semi Fire Resistive) and only reinforced masonry structures such as parking garages or similar are rated as Class 6.</p> <p>The ISO states the term “fire resistive” pertains to “CLM description of fire resistive construction, followed by the associated ISO construction code, is exterior walls, floors, and roof of masonry or fire-resistive materials with a fire resistance rating of at least 2 hours (Construction Code 6). Obviously the developer does not plan such a structure within the proposed development.</p> <p>While shelter-in-place has become more common for individual residences in some areas, it is most common in multiple occupancy dwellings and commercial/office buildings where they are specifically hardened against the exposure effects of fire or other disaster potentials. A number of issues appear to exist in the proposed development regarding shelter-in-place:</p> <p>First, construction of any “shelter in place” facility cannot reasonably guarantee the safety of occupants. Granted that the higher the construction class, Reinforced Masonry (Class 6) versus Ordinary Frame (Stucco on frame included) (Class 1) or Joisted Masonry (class 2) will afford better protection. However, without adequate outside fire suppression components, such as exterior sprinklers and water curtains, even Class 6 Fire Resistive construction may be insufficient to afford protection to occupants in anything but a very fast moving fire where impact and impingement is brief.</p> <p>Secondly, having the fire department allocate apparatus and manpower to protect the “shelter-in-place” facility will dilute their ability to provide suppression efforts in areas where a wildfire may be expected to be best controlled.</p> <p>Third, if shelter-in-place becomes unfeasible due to fire conditions, how will an additional 330 people now evacuate quickly? I fear failure to be able to move that many people, in a panic situation, will result in any structure becoming a virtual death trap for the occupants.</p> <p>Fourth, the lack of adequate egress roads from this proposed development will severely raise the potential for entrapment within the community, not only for the residents of that community, but also for residents of Harmony Grove Village, an existing development, and Valliano, a yet to be constructed development that was recently approved. The statement contained within planning documents that Citricado Parkway is a 4 lane road is erroneous in that the sections available for egress from the current and proposed developments are only two lane.</p> <p>Fifth, Rancho Santa Fe Fire Protection Districts own guidelines state “To be considered shelter-in-place, an entire community must be designed to withstand heat and flames from an approaching wildfire. In</p>	<p>Response to Comment PCI11-1</p> <p>The comments are noted, but are not in conflict with the EIR and supporting documentation. The Project is not identified as shelter in place, but rather as a location of temporary refuge if a short-notice fire event would result in unsafe evacuation conditions. Late evacuations are widely regarded as the most dangerous component of wildfire evacuations. The Project provides a contingency option, like any new master planned community in San Diego County that is built to the County’s restrictive, ignition-resistant, levels. As documented in the Project Fire Protection Plan (FPP), although it is not designated a shelter in place facility, it would incorporate all of the current construction requirements for such facilities, would include ongoing fire district inspections, and exceed the codes for several fire protection features; and therefore would withstand fire better than many of the older homes in the area. The preferred option is an early evacuation of the Project’s residences. When that is not possible, responding emergency personnel will have a contingency option that may be considered safer than a late evacuation.</p> <p>Response to Comment PCI8-2</p> <p>The County disagrees that allocation of resources to protect the Project will dilute ability to provide fire suppression efforts. The Project’s fire protection system would enable fire response resources to be allocated where they are needed most, which is likely in areas with older construction and lack of defensible space. Evacuation in a timely manner is always preferred. The Project would provide contingency refuge as directed by emergency fire personnel, in which case they would be present on site as a part of their emergency response. The same emergency personnel would judge when it was timely to resume evacuation, and would so direct that process. Please also see the Global Responses to Fire Hazards Impact Analysis, and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment PCI8-3</p> <p>Adequacy of egress roads has been specifically addressed in the Project FPP, as well as in the County Rohde Report. Please also see the Global Responses to Fire Hazards Impact Analysis, and Adequacy of Emergency Evacuation</p>

COMMENTS	RESPONSES
	<p>and Access. The statement regarding Citracado Parkway is not understood. Subchapter 2.2, <i>Transportation/Traffic</i> of the EIR notes that the road is classified as a four-lane major roadway in the City of Escondido General Plan Mobility Element, but is currently built as a two-lane roadway with a wide planted median.</p> <p>Response to Comment PCI8-4</p> <p>Please refer to Response to Comment PCI18-1 of these comments. Please also note that the Rancho Santa Fe Fire Protection District has approved the Project FPP, with specific review of the Project roadway and driveway widths. Please also see the Global Responses to Fire Hazards Impact Analysis, and Adequacy of Emergency Evacuation and Access.</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter No. PCI8</p> <p>other words, the entire community must be built with and share the same ignition-resistant design qualities, including:</p> <p>A well-maintained, fire district approved landscape and vegetation management plan. Adequate roadway and driveway widths, designed to accommodate two-way traffic and large firefighting apparatus. Obviously we do not have that adequacy and to allow this proposed development without first making the needed improvements to egress ensuring the safety of residents is unconscionable.</p> <p>I urge the Board of Supervisors to reject this plan.</p> <p>Bruce J. Schryver 21642 Saddle Bred Lane Escondido, Ca 92029</p>	<p>Response to Comment PCI8-5 The comment does not raise specific issues regarding substantive environmental analysis within the EIR. Opposition to the Project is noted, is part of the administrative record, and will be before decision makers during consideration of the Project.</p> <p>Response to Comment PCI8-6 – Attachment This portion of the comment is a summary curriculum vitae showing qualifications for the commenter. It is noted, but does not require response.</p>