



Deer Springs Fire Protection District

8709 Circle R Drive • Escondido, CA 92026 • tel 760-749-8001 • fax 760-749-6572

July 28, 2014

Mark Slovick, Project Planner
County of San Diego
Planning and Development Services
5510 Overland Ave. Rm. 310
San Diego, CA 92123

RE: DEIR for Lilac Hills Ranch

Mr. Slovick,

This letter will serve as the public comments of the Deer Springs Fire Protection District in response to EIR for the proposed Lilac Hills Ranch Development.

The position of the Deer Springs Fire Protection District in regards to this project is that while the District has the capacity and intent to serve the project, it is not possible for the District to respond to the proposed development within the 5 minute response time required under the general plan. This has been a point of long discussion between the District, the County, and the applicant. Many different options for provision of service in the project area have been proposed, and all have been unacceptable from the District's perspective.

The primary problem is that the District is stuck between plans that build excess response capacity at a tremendous ongoing cost to the District, or compromising service to existing residents in order to serve the new project. Neither of these approaches is to the advantage of the District in the long run. The District cannot accept any response option that requires a fourth fire station in the District due to the cost of ongoing operations. The projected ongoing revenue at build out falls short of providing for the full cost of staffing, equipment, administration, and maintenance of an additional facility. The District does not feel that it is in the interest of the District to levy a special assessment or CFD on the development in order to offset these costs, as the district already has one of the highest rates of assessment for fire services in the county. Providing a substantially different service to new residents of the District (through the use of reserve firefighters, lesser staffing, or some other approach to service delivery) is similarly unacceptable because it would require a disparate level of service for the same assessed cost as existing residents. These basic issues have led to the response options as put forth by the applicant to be viewed as wholly unacceptable to the District.

Because of this, the applicant has viewed their best option for meeting general plan compliance with respect to response times is to use the CAL FIRE Miller Fire Station as their primary fire station. To clarify the District's relationship with CAL FIRE and the Miller Fire Station, it should be pointed out that the District has a cooperative agreement with CAL FIRE for staffing and dispatch services, and by virtue of that agreement does routinely utilize the Miller Fire Station for response to the area that is encompassed by the proposed development. However, Miller Fire Station is not a part of the District, receives no funding or control from the District, and is not capable of response compliant with the internal standards of the District. For this reason, our current operations require that responses from the Miller Station must always be augmented by District apparatus. The CAL FIRE station exists for response to wildland fires in the State Responsibility Areas (SRA) in and around the area, not as a primary responder for a more suburban setting as might exist subsequent to the proposed project being constructed. The District is the Fire Authority Having Jurisdiction (FAHJ) for all other responses. The internal standards of the District require response from a Type 1 engine with Paramedic capability. This is the standard received throughout the district today, and will be the standard going forward. The Miller Fire Station does not meet these standards. The position of CAL FIRE has been that the use of Miller as the primary fire station would be an inappropriate use of their resources.

The County of San Diego has an agreement with CAL FIRE that keeps the Miller Fire Station open during the "off season" known as an "Amador Agreement". This agreement is between CAL FIRE and the County, and is separate from any requirements internal to the District. It does not change the mission, purpose or capabilities of the Station.

Because the District is not able to find an acceptable option for the provision of service in compliance with the General Plan response time requirement, it was decided that should the County accept the use of the Miller Station as meeting the intent of the General Plan, the District would respond to the development under our own response time standards which would result in response times of 7 to 9 minutes within the project. This is reflected in the Fire Protection Plan dated June 6th 2014 beginning on page 30. This should not be interpreted as an endorsement of the use of the Miller Fire Station for the purpose of emergency travel time by the District, but rather a statement of the practical reality of how response to the project will work should it be approved.

Sincerely,

Chris Amestoy
Fire Chief
Deer Springs Fire Protection District

