

Letter I51i

July 8, 2014

To: Mark Slovick, Project Manager
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Mark.Slovick@sdcounty.ca.gov
(858) 495-5172

Subject: Revised DEIR Public Comments Regarding Fire Protection Plan, Evacuation Study, and DEIR Chapter 2.7 Hazards Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

Attached in Attachment 1 are the August, 2013 Public Comments regarding Lilac Hills Ranch Fire and Evacuation Hazards

The REIR either did not directly respond to each of the items or failed to adequately respond to the issues raised in this letter and its Attachments.

For example, the attached comments request factual and direct answers to specific Project proposed Covey Lane and Mountain Ridge private road improvement plans which are not completely addressed in the RDEIR.

Specifically, the REIR did not provide an answer to the questions raised on every questioned element of the attached Fire and Evacuation letter.

Published County policies and specific assurance from County Staff have clearly stated that all August 2013 DEIR comments if resubmitted, will be responded to. Therefore, respond to each specific issue raised in the attached letter as part of the County's Response to Public Comments for the revised DEIR.

Sincerely,



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I51i-1a

I51i-1a Introductory comments are noted. See responses that follow for detailed responses to each comment delineated below.

LETTER

RESPONSE

2 | Page of 1

Attachments

Letter I51i

August 11, 2013

To: Mark Slovick, Project Manager
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
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(858) 495-5172

Subject: DEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP), Fire Protection Plan, Evacuation Study, and DEIR Chapter 2.7 Hazards

Dear Mr. Slovick –

Fire Protection Plan (FPP)

The proposed Lilac Hills Ranch (LHR) Project FPP does not meet the following basic requirements identified below by Issue Number:

1. Of the three Fire Station site Options proposed by the Applicant, none meet the minimum acceptance criteria of the Deer Springs Fire Protection District (DSFPD). The Charter of the DSFPD focuses on providing no greater than 5 minute emergency response time to the ENTIRE DSFPD, of which the proposed LHR Project is a subset.
2. The Applicant states in the FPP that the LHR Project fully complies with the DSFPD Ordinance No. 2010-01, County of San Diego Consolidated Fire Code, and County of San Diego Public and Private Road Standards. **The LHR has factual compliance issues with all of these regulations.**
3. The FPP focuses nearly exclusively on Wildfire Management and does not sufficiently address Structure Fires, Emergency Medical Service (EMS), or perform any Fire Safety Zone Analysis whatsoever.
4. The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads.
5. Fuel Modification Zones (FMZ) – The applicant appears to rely on other property owners outside the LHR Subdivision boundaries to comply with the 100 foot FMZ requirement.

I51i-1b

I51i-1b This comment is an introduction to comments that follow. A thorough response that addresses each topic follows.

Each of the five Issues above is substantiated as follows.

Issue 1 – Acceptable siting Options for a Fire Station servicing the LHR Project - The following information has been synthesized from the 6/12/13 (Attachment A), 3/5/2013 (Attachment B), and 8/10/2013 (Attachment C) DSFPD Letters. In addition, Valley Center Community Planning Group (VCCPG) members had a 2 hour meeting with Chief Arnestoy as well as telephone conversations with respect to Environmental Impacts of the proposed LHR Project. VCCPG members also interacted with the Deer Springs Fire Board during their August 7, 2013 public Board meeting. Information from these interchanges are reflected below.

I51i-2

I51i-2 The comment provides background information. However, the commenter incorrectly states that Station 11 could not serve the project. A portion of the project can be served by Station 11; there are 71 units that are reachable by Station 11 within a 5-minute travel time. (See FEIR, subchapter 2.7.2.4.) The 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. Since the comment does not raise an environmental issue within the meaning of CEQA or with respect to the FEIR, no further response is required.

- The DSFPD Charter is to provide Fire and EMS services for the entire District, including the potential LHR Project.
- DSFPD owns three fire stations (Station 11- 8709 Circle R Drive, Escondido; Station 12 - at

1321 Deer Springs Road, San Marcos; and Station 13 - at 10308 Meadow Glen Way East, Escondido.

-No existing DSFPD Station has the ability to meet the 5 minute Emergency Response Time requirement for Fire Services to the proposed LHR Project.

-The Miller Fire Station (Station 15) is NOT OWNED BY DSFPD. IT IS OWNED BY CAL FIRE (STATE OF CALIFORNIA). Station 15 is seasonal, is equipped with a Brush engine that is not suited for Urban Structures fires, and does not have EMS equipment or staff.

-The District has a policy of a uniform tax rate across all County assessed real property in the District.

-The 2013 DSFPD Annual Operating Cost (Recurring cost not including Capital expenditures for land, facilities, and equipment) for an operating Fire Station is \$ 1.2 Million.

- The estimated Annual revenue increase to DSFPD from the LHR Project at full build out in 2013 dollars is \$ 0.8 Million. LHR tax base only provides 2/3 of the Annual Operating Cost to fund a Fire Station.

- DSFPD (not CAL FIRE or any other Fire Authority) must provide 5 minute or less Emergency Response Time for Fire and EMS service to all customers in the DSFPD, including the proposed LHR Project. The only feasible method for DSFPD to accomplish this is by operating a total of 3 Fire Stations, because the LHR Project does not generate sufficient annual revenue to cover the operating cost of a 4th DSFPD Fire Station dedicated to the LHR Project.

Given the above background and constraints, none of the three options provided on Page 28 of the FPP are feasible as substantiated below in bold:

Option 1: This option includes DSFPD and/or SDCFA and CAL FIRE agreeing that CAL FIRE's Station 15 (Miller Station), would provide primary response to project emergencies. This option would include a new fire station or a remodel of the existing Station 15 site, and a new Type I engine. This would require a new agreement between DSFPD and/or SDCFA, and CAL FIRE. **This Option is not feasible because the Miller Fire Station is not within DSFPD's Jurisdictional Authority. The Miller Fire Station is owned and controlled by another Governmental Agency that does not have the Charter to provide Fire and EMS Services to the entire DSFPD.**

Option 2: This option would include a new separate DSFPD fire station on the CAL FIRE Station 15 site in order for such facility to be completely independent from CAL FIRE. This option would include an agreement between DSFPD with CAL FIRE to either remodel Station 15 to co-locate and staff a DSFPD Type I paramedic engine on the site with CAL FIRE or the construction of a completely separate DSFPD station. The new station or remodel would accommodate an engine from station 11 or a new engine purchased for the new facility. This would require an amendment to the existing Amador Agreement with CAL FIRE. **The Miller Fire Station is not within DSFPD's Jurisdictional Authority. The DSFPD's mission is to provide Wildfire, Structural, and Emergency Medical Services for the District. The Miller Fire Station is owned and controlled by the State of California. The primary mission of the California Fire Authority is to provide Wildfire Management for the State of California. The DSFPD does not find it within its Charter and the DSFPD's fiduciary responsibility to the District it serves to enter into a lengthy and complicated**

151i-2
cont.

151i-3

151i-4

151i-5

151i-3 See Global Response: Fire and Medical Services for a thorough discussion of the topic.

151i-4 The commenter states that DSFPD "has a policy of a uniform tax rate across all County assessed real property in the District." However, the commenter fails to provide substantive evidence regarding the validity of this assertion. DSFPD has little or no control over the taxes that are being assessed for fire services. The County voluntarily conveys a percentage of parcel tax to DSFPD, and DSFPD receives another approximately 36 percent of its annual budget from a voter-approved (1981) special fire standby/availability fee, 36 percent from a 2004 voter-approved fire suppression assessment, 16 percent of its revenue from a County supplement, and 2 percent from miscellaneous sources (interest, weed abatement, first responder, etc.). (See Capabilities Assessment.)

With regard to the commenter's assertion that three stations would need to be operated in order to serve the project, see Global Response: Fire and Medical Services.

Also, with respect to the feasibility of the fire options, see Global Response: Fire and Medical Services.

151i-5 Please see Global Response: Fire and Medical Services.

inter-agency Agreement that alters the Charter and Missions of both Agencies. This option is not feasible.

151i-5
cont.

Option 3: If an agreement cannot be reached between SDCFA and/or DSFPD and CAL FIRE (Option 1) or between DSFPD and CAL FIRE (Option 2), a new fire station would be constructed within the Lilac Hills Ranch Project. A Type I paramedic engine would be added at the station. The engine could either be reassigned from Station 11 or a new Type I purchased for the Station. The construction of a new fire station would be triggered upon the construction of any lot outside the 5 minute response time, equivalent to the 54th unit in Phase 1. If DSFPD agrees, a temporary on-site fire station could be constructed at the same trigger. **This option is not feasible, because there is not enough DSFPD tax revenue generated annually to fund the Annual Operating Cost of a fourth DSFPD Fire Station.**

151i-6

151i-6 Please see Global Response: Fire and Medical Services.

-DSFPD has stated that the following sequence of serial steps needs to occur before a fact based determination on how to achieve 5 minute Emergency Response Time can be achieved by DSFPD for the proposed LHR Project:

1. DSFPD needs to hire an expert in Operations Research to model how best to provide Services with three fire stations for the entire District, incorporating the large Service needs increase of the LHR Project. The end product would provide the optimum site location potentials for a 3 station DSFPD force. This likely would result in the closure of an existing DSFPD Station and re-siting of the Station on a County Circulation Element Road outside the boundaries of the LHR Subdivision, because this station would have to service other areas in addition to the LHR Project.
2. There is a high probability that the Study in 1) above will make recommendations that require the purchase of land for a different Fire Station Site and the construction of a new facility at that site.
3. It is likely that additional Capital Equipment must be purchased for the new Site in 2) above.
4. DSFPD considers items 1, 2, and 3 above to be Direct Development Impacts that are entirely attributable to the LHR Project. Therefore Accretive Investments must pay these costs in their entirety, not existing DSFPD taxpayers.

151i-7

151i-7 The comments from DSFPD that are referred to herein are out of date and do not reflect the new comment letter provided by DSFPD to the County, dated July 28, 2014. See Global Response: Fire and Medical Services for a thorough discussion of the topic.

In summary, the FPP as published does not demonstrate any feasible method to provide 5 minute Emergency Response Service to the Proposed LHR Project.

151i-8

151i-8 See Global Response: Fire and Medical Services for a thorough discussion of the topic.

This is a factual certain "impact to cause substantial adverse direct and indirect impact on human beings" under the California Environmental Quality Act (CEQA) and the County of San Diego must find a **Mandatory Finding of Significance**.

Issue 2 – FPP claims of full compliance with Fire Codes and Ordinances; Road Standards

Fire Codes and Ordinances – DSFPD Ordinance No. 2010-01 is the District's implementation of the San Diego County Consolidated Fire Code. San Diego County Public Road Standards and separate Private Road Standards are the governing compliance documents for Road Design. The FPP Section 2.2 states as follows:

2.2 Fire Apparatus Access Roads

"An additional (sic.) emergency ingress/egress road is provided to/from the southern portion of the project via existing Mountain Ridge Road and Rodriguez Road. Mountain Ridge Road is accessed from Circle R Road, and Rodriguez Road is accessed via Covey Lane. These roads will meet County Private

151i-9

151i-9 The comments do not address the content or adequacy of the FEIR. Also, the commenter has mischaracterized a number of issues pertaining to Mountain Ridge Road which are addressed in this response. First, approximately 5.5 percent of the total project traffic would access Mountain Ridge Road as this access would be restricted to the southern half of Phase 5 (Zoning Districts SRS-5 and SFS-6, and the Institutional site) because of existing easement restrictions. (See FEIR, subchapter 2.3.3.3 for further discussion.) The roadway exceptions requested for Mountain Ridge Road would allow the private roadway to remain in its current state, with the exception of minor widening to ensure that there would be two 12-foot lanes consistent with County Private Road Standards and would avoid significant

road standards for fire apparatus access and will be gated. These ingress/egress roads and all the interior project road circulation will be constructed to San Diego County Private Road Standards and will provide unimpeded fire apparatus access throughout the project. Private Road Standards are similar to public road standards with few exceptions.

Mountain Ridge Private Road – The existing Mountain Ridge private road has a 16.6% Vertical Curve that the Applicant verifies on Sheet 8 of the LHR Master Tentative Map. This exceeds current Private Road Standards as well as being non-compliant with the Consolidated Fire Code.

Mountain Ridge is 2580 feet from the subdivision boundary to Circle R Public Road. Accretive is planning no improvement for Mountain Ridge other than adding 4 feet of paved surface (2 feet on each side). The resulting road does not meet San Diego County Consolidated Fire Code requirements. The proposed road is non-compliant in Vertical Curve Requirements design and construction and does not meet two San Diego County Private Road Standards parameters. Compliance with San Diego County Road Standards is a requisite condition for compliance with the San Diego County Consolidated Fire Code.

The road design for the LHR project is based on receiving approval for two Requests For Exemption for Road Standards (RFEFRS) for Mountain Ridge that are not in compliance with County Road Standards and therefore Fire Ordinance and Codes..

One RFEFRS (Attachment D) seeks to lower the Design Speed to 15 MPH from 25 MPH while increasing the current traffic load from 250 Average Daily Trips (ADT) to 2250 ADT with proposed LHR Project traffic. An independent expert review of the Applicant's Traffic Study has found that the Applicant has understated the proposed LHR Traffic Study an overall 11.9%. There is a very high likelihood that a fair and balanced Traffic analysis will conclude that the cumulative Traffic load of Mountain Ridge Road will exceed the 2500 ADT threshold and will be required to be designed and built to more restrictive Public Road Standards to be compliant with County Road Standards.

The other RFEFRS (also in Attachment D) requests to eliminate the need to construct a portion of the intersection taper feature at the Circle R intersection. This taper enables a large vehicle, such as a Type I Fire Engine to complete a right hand turn from Circle R Drive to Mountain Ridge Private Road.

The Applicant has submitted the June 25, 2013 Sight Distance Analysis enclosed in Attachment E. This document states that the LHR Project as proposed is only able to achieve Sight Distance compliance by using a County Right – that of Prescriptive Easement Access for Brush Clearance – this right is not owned by the Applicant. How does the Applicant propose to legally provide Sight Distance compliance at this intersection?

Covey Lane – The Applicant submitted the June 25, 2013 Sight Distance Analysis enclosed in Attachment F for the proposed intersection with West Lilac Lane. This intersection fails to meet Sight Distance requirements. Question – Please answer how the Applicant expects to gain the additional rights required to grade a substantial portion of a parcel of land that they do not own rights on to achieve Sight Distance standards compliance.

Private Road Standards – San Diego County Private Road Standards are SIGNIFICANTLY relaxed from Public Road Standards in key Safety related areas such as allowable Sight

151i-9 cont.

151i-10

151i-9 (cont.)

grading and disruption to existing driveways. The design exceptions being requested are included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions may be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.) The FEIR also analyzed the issue of transportation hazards with respect to the road network design for the project, including Mountain Ridge Road improvements and the "taper" exception at the Circle R intersection, and determined that impacts associated with transportation hazards would be less than significant. (FEIR, subchapter 2.3.3.3.) Please see also Global Response: Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion regarding the taper improvements to the intersection of Circle R Road and Mountain Ridge Road.

Additionally, the Fire Protection Plan (FPP) included as Appendix J in the FEIR provides that all proposed roads within the project shall be designed in accordance with the Fire District Standards and the County Consolidated Fire Code. The FEIR analyzed the issue of compliance with road standards and determined that no impacts associated with noncompliance with road standards would result. (FEIR, subchapter 2.7.2.4and FPP.)

151i-10 The comment states that the project does not have legal rights to provide the sight distance needed for Covey Lane and has not provided sufficient information regarding its compliance with County Consolidated Fire Code and County Private and Public Standards with respect to streets within the project to allow it to evacuate its residents safely. Please see also Global Response: Easements (Covey Lane and Mountain Ridge Roads) for a thorough discussion regarding the right to provide sight distance needed for Covey Lane. With respect to the ability to evacuate safely, please see response to comment 151i-17 below.

LETTER

RESPONSE

Distance on Vertical and Horizontal Curves and Intersections, road design, and road materials. Accretive is placing a large percentage of 5,185 people in potential Wildfire evacuation scenarios in smoke filled environments over the same narrow 24 foot roads with Sight Distance Lines that fail County Standards. And Accretive says this is safe?

In summary, the FPP as published does not demonstrate proposed LHR Project compliance with County and DSFPD Fire Codes and Ordinances or County Public and Private Road Standards. Accretive is creating significant Safety Issues, and not providing mitigation.

This is a factual certain "impact to cause substantial adverse direct and indirect impact on human beings" under the California Environmental Quality Act (CEQA) and the County of San Diego must find a Mandatory Finding of Significance.

Issue 3 – The FPP focuses exclusively on Wildland fire Hazards – The FPP does not sufficiently address either Structure Fires or Emergency Medical Service (EMS) such that Environmental Impact and mitigations can be assessed.

The term "Emergency Medical Services" is stated exactly twice in the FPP and only as a reference to a legally required service of the District. No analysis of the significant EMS demand load and response issues associated with the proposed LHR project's disproportionately large Senior Residential Housing population is provided.

The term "structure fire" is stated exactly once in the FPP and only as a reference to a legally required service of the District. No analysis of any of the many Structure Fire hazards and response scenarios that the proposed LHR Ranch induces are performed.

In the Wildland fire discussion in the FPP and DEIR Chapter 2.7 Hazards, there was not a single discussion of Fire Safety Zones (FSZ). FSZ's are a critical required element of a Wildland Fire Management Plan, indicating areas of topography and fuel load that are unsafe for Fire Personnel entry.

Revise the FPP to include these essential analyses: EMS requirements and response times, Structure Fire Hazard analysis, and Wildland fire FSZ analyses and resubmit the FPP and EIR with an additional 45 day Public Comment Period.

Issue 4 – The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads - Unsubstantiated assertions and conclusions regarding the impacts of use of electronic road gates on fire access roads provided in DEIR Chapter 2.7 – "Hazards" needs to be substantiated by supporting analyses in the FPP.

The inclusion of six electronic gates across fire access roads in Project design is problematic. Additional analysis needs to be performed in the FPP. Particularly troubling scenarios are potential routes that have more than one gate to access in series to provide emergency Fire and EMS services.

Why was the FIGURE 2.7-1 Project Gated Access graphic (Attachment G) not included and it's Environmental Impacts with respect to human safety discussed in the FPP?

Please revise the FPP to include these vital analyses and resubmit with an additional 45 day Public Comment Period.

I51i-10
cont.

I51i-11

I51i-12

I51i-13

I51i-14

I51i-15

I51i-11 The comment asserts that the FPP does not sufficiently address structure fires or emergency medical services such that the impact and mitigation can be assessed.

The FPP evaluates the number of emergency calls that is calculated to be generated by the project. Structure fires are one small segment of the overall call load and are included in the call volume and is a part of the evaluation. The FPP and Capabilities Assessment, included in the FEIR as Appendix J and Specific Plan Appendix D respectively, assess the potential impact the project will have on the DSFPD fire response system, including the type of calls, projected response times, and District capacity. Findings indicate that the DSFPD has the capacity to service the project from existing stations, but would not meet the County's 5-minute travel time standard. Mitigations include options that would facilitate 5-minute response times.

The comment expresses concern regarding the provision of emergency medical services, and the level of analysis contained in the FPP. The Capabilities Assessment, attached to the Specific Plan, included an in-depth analysis of the projected call volume and types of calls generated by the project, including the senior residential housing population. The results are consistent with the numbers used in the project's FPP. Therefore, no additional analysis is considered necessary. See also Global Response: Fire and Medical Services.

I51i-12 The comment focuses on the use of the term structure fire in the FPP. Please refer to response to comment I51i-11. The FPP and Capabilities Assessment report analyzed both EMS and structure fire calls, along with any other type of call, which historically occurred in the DSFPD. See Global Response: Fire and Medical Services.

I51i-13 The comment suggests that Fire Safety Zones (FSZs) should be discussed in the wildland fire discussion of the FPP. The commenter confuses the FPP with a wildland fire management plan. Unlike an FPP, a wildland fire management plan is not intended to document fire risk and measures to protect a new development. FSZs that would be included in a wildland fire management plan would be part of a fire agency's internal pre-planning programming for wildland firefighting.

LETTER

RESPONSE

	<p>I51i-14 See responses to comments I51i-11, I51i-12, and I51i-13 above. Based upon the above responses, the FEIR is legally adequate and revisions to the FEIR and recirculation are not required as a result.</p> <p>I51i-15 The commenter states that the FPP does not adequately address and analyze the environmental impacts with respect to the use of gates on fire access roads and requests that the FPP be revised to include this analysis.</p> <p>In consideration of the comments received regarding this concern, additional language and analysis has been provided and incorporated in the FPP regarding this subject. Specifically, Section 4.2.7 of the FPP has been revised to include details about requirements for gates associated with access to residences, emergency back-up requirements, and override processes. The gates proposed for the project would be in compliance with DSFPD guidelines and County Consolidated Fire Code Section 503.6. Any gate or barrier across a fire access roadway shall have specific plans reviewed and approved by DSFPD, and receive Specific Plan approval prior to installation. (See FPP Section 4.2.7) In addition, per the DSFPD conditions attached as part of the Public Facilities Availability Form (see Appendix R of the FEIR), gates accessing more than four residences or residential lots, or gates accessing hazardous institutional, educational, or assembly occupancy group structures shall also be equipped with approved emergency traffic control-activating strobe light sensors(s) or other devices approved by the fire code official to assure safe access by emergency vehicles. Additional analysis, included in the FEIR, determined that automated gates equipped with sensors or similar devices will require less time to open and would result in minimal delays. (see FPP.) Overall, compliance with gate requirements of the DSFPD guidelines and County Consolidated Fire Code would assure that no impacts associated with secondary emergency access to the project would occur. (FEIR, subchapter 2.7.2.4, and subchapter 2.7.6.)</p>
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Issue 5 - Fuel Modification Zones (FMZ) – Section 5.4 Fuel Management Zones on page 42 of the FPP states “The project includes a few areas where fuel modification zones are less than 100 feet wide. Based on even a quick scan of Figure 1.6 from Chapter 1 of the DEIR (Attachment H) the more accurate and true statement is: “The project includes extensive areas where fuel management zones are less than 100 feet wide.”

Why was Figure 1.6 not included, analyzed, and every exception to the 100 foot FMZ requirement discussed in the FPP and Chapter 2.7 Subchapter 2.7.3.4 Issue 4: Wildland Fires? Please revise both documents to assess these concerns and recycle for a 45 day Public Comment Period so that Environmental Impacts and mitigations can be assessed.

Evacuation Plan - The Evacuation Plan does not address the most fundamental evacuation issue of the Proposed LHR Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed LHR Project added to the existing area rural and semi-rural population.

The LHR Project has but two Public Roads that provide evacuation routes to the West: West Lilac Road to the north and Circle R Road to the South. Both are two lane rural Circulation Element 2.2 E roads for which **Accretive plans no upgrade**. Accretive is brazenly requesting exception to future County upgrade plans for portions of West Lilac Road to be **downgraded** from 2.2 C to 2.2 E capacity.

The LHR Project has but a single evacuation route to the East. That is the easterly section of West Lilac Road that connects to Lilac Road. It is a Circulation Element 2.2 E two lane rural road. The current as built configuration of this road does not meet current 2.2 E road design standards for certain design features, such as paved shoulder width, sight distance, design speed, curve radii, etc. There are no plans to upgrade this road. Accretive does not propose to pay for their direct development impact to this stretch of West Lilac Road.

Please refer to Figure 1 below that illustrates the proposed LHR Project Evacuation Routes:

151i-16

151i-17

151i-16 The commenter states that the project includes extensive areas where FMZs are less than 100 feet wide, and expresses concern that this was not included in the project analysis. As stated in FEIR subchapter 2.7.2.4, and shown on Figure 1-6, several areas of the project site would not meet the 100-foot standard for FMZs as described by Consolidated Fire Code. Specific fire-resistive building features and/or landscape features as detailed in Section 4.6 of the FPP are included as project design features that provide the same function as a full 100 feet of fuel modification. These measures, listed in FEIR subchapter 2.7.2.4 and Table 1-3 will be implemented through the project's conditions of approval and subsequent permit requirements. Notwithstanding regulatory compliance and the inclusion of project design considerations, the FEIR recognizes and discloses that the inability to meet the standard 100-foot FMZ could represent a significant impact (Impact HZ-1). Mitigation measure M-HZ-1, detailed in FEIR subchapter 2.7.5, provides alternative measures including obtaining off-site permission to clear, or alternatively, additional ignition-resistant construction methods and other non-combustible features, or fire barrier walls that achieve the same level of protection from potential wildfires as the 100-foot buffer. Any structure located next to a FMZ would be subject to local and County Fire Codes to prevent any modifications that could compromise the fire barriers (i.e., adding a vent or skylight to these structures in the future). This mitigation measure would reduce impacts to wildland fires to less than significant.

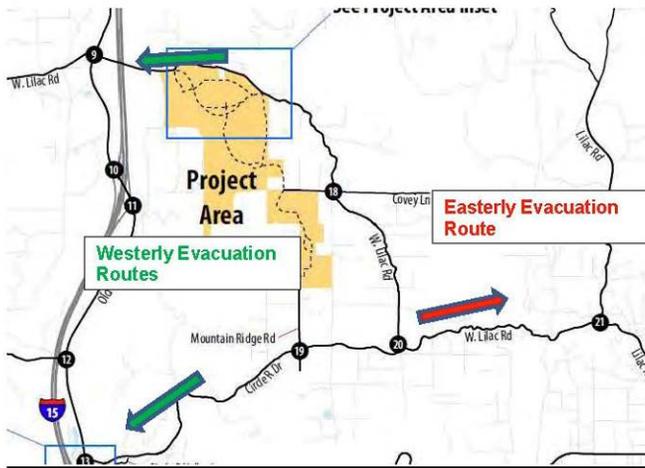
The commenter also expresses concern that Figure 1.6 was not included in the FPP, and requested that the FEIR and FPP be revised and recirculated. The project fire consultants (Dudek) conducted a detailed analysis of the areas where fuel modification is reduced from 100 feet. In particular, an analysis of fuel modification zones which analyzed the fire behavior across the project site, and compared it against the proposed development footprint, product type and proposed structure setbacks. As a result of the findings of the fire modeling, the project proposed the design features that would be incorporated into the project, including the creation of the identified FMZs; the use of ignition-resistant building materials; fire and building code requirements for the protection of non-residential structures; the provision of secondary emergency access roads, and adequate water supply for fire hydrants. Each of these features is discussed in detail in FEIR subchapter 2.7.2.4. (See also FPP Appendix J – Fuel Modification Zones Analysis – Dudek).

LETTER

RESPONSE

	<p>I51i-16 (cont.) Depending on the individual situation, the reduced width, the off-site fuels, and adjacent buildings, alternatives are proposed. Enhanced fire-resistive construction measures are proposed to be used to mitigate reduced fuel modification zones and are detailed in Section 4.5 of the FPP, and FEIR, subchapter 2.7.2.4 and Capabilities Assessment pp 12-13. Such measures include the elimination of vents and skylights on structures facing natural fuel and open space areas on-site and native flammable fuels located off-site. Roadways, parking lots, sidewalks, concrete patios, decorative rock, natural boulders on-site, and similar landscape features are allowed to be located within the fuel modification zones as objects that will not support fire. Other alternative measures that achieve the same level of required protection may be used, including, but not limited to one of the following: (1) utilize adjacent irrigated and managed agricultural crops (orchards, commercial flower fields, etc.); (2) fuel modification and hazard abatement required and completed around structures by adjacent landowners to meet fire code on their property and which is contiguous with the development; (3) DSFPD hazard abatement requirements for fuel modification and hazardous abatement 50 feet along the perimeter of adjacent properties, (4) additional ignition-resistant construction methods, non-combustible features, i.e., roadways and right-of-way modified fuels, parking lots, sidewalks, etc.; (5) fire-barrier/deflection walls; or (6) a recorded easement acquired from adjacent landowners for the purpose of maintaining required fuel modification (there is no off-site clearing proposed. However, if off-site clearing is proposed in the future, the easements must be provided before the project can move forward). (See FPP Section 4.5.)</p> <p>I51i-17 The commenter asserts that the Fire Evacuation Plan does not adequately address the central evacuation issue of the proposed project, the ability to evacuate over 5,000 residents of the proposed project while utilizing the limited number of roads that serve the project. The reasons for this concern include the limited number of roadways in the project, the physical condition of the roadways, and the number of future residents that would be added to the existing population as a result of the proposed project.</p>
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Figure 1 – Westerly and Easterly Evacuation Routes



151i-17

What would happen if a Wildfire from the East driven by Santa Ana winds with the resulting large smoke plume required sudden Westerly evacuation of the LHR project?

And:

- In the ensuing panic and with obscured vision, a four vehicle accident involving a two axle flatbed truck, a pickup truck with horse trailer, and two cars blocked the West Lilac Bridge over I-15.
- Nearly simultaneously, the fire jumped and sections of Circle R Road were involved, requiring five Fire Crews with Type 3 and Type 1 Engines to be engaged in suppressing the fire, having the effect of blocking Circle R Drive?
- While the rest of the Valley Center Population to the East of the proposed LHR Project is simultaneously attempting to evacuate to the West using West Lilac Road to I-15.

However, the FPP has set us straight on what the more probable risk area is: a large Wildfire from the West.

151i-18

The FPP recognizes the large fuel load immediately to the east of the I-15 Freeway that hasn't

151i-17 (cont.)

With respect to the limited number of roadways and the number of future residents being added to the existing population, the project would provide additional emergency routes as shown in FEIR Figure 2.7-3. These evacuation routes will become available to the existing residents as the project constructs new roadways within the project and improves existing roadways in the area. Information related to these new roadways is included in the FEIR in subchapter 2.3.

The FPP evaluated the fire hazard of the area and its potential effect on the project as well as the potential increased hazard that may result from the proposed project. A wildland Fire Behavior Assessment was included in the FPP to provide four worst-case scenarios for wildland fires. As a result of the findings of the fire modeling, project design features were incorporated into the project, including fuel modification zones, use of ignition resistant building materials, provision of secondary emergency access roads, in order to reduce the risk of fire hazard. The project would also meet all fire and building code requirements, and an adequate supply of water for fire hydrants was deemed available (see Appendix T).

The FEIR analyzed each of the design features to determine whether the features would reduce the risk of exposure of people or structures to a significant risk of loss, injury, or death from wildland fires. The FEIR found that with the adoption of mitigation measure M-HZ-1, impacts to wildland fires would be reduced to less than significant. (FEIR, subchapter 2.7.2.4.) Subchapter 2.7.3.4 of the FEIR also identified that the project's contribution to a potential cumulative impact would be less than cumulatively considerable with respect to wildland fire hazards based on implementation of the FPP, associated landscaping plans, and mitigation measures.

LETTER

RESPONSE

	<p>I51i-17 (cont.)</p> <p>The Evacuation Plan determined that the location of the project and the existing and planned roads provide adequate multi-directional primary and secondary emergency evacuation routes. (Evacuation Plan, page 8.) The primary evacuation routes are shown on Figure 2.7-3 of the Evacuation Plan, consisting of Main Street, Street F, Lilac Hills Ranch Road, Covey Lane, and Mountain Ridge Road. The project site also has a number of secondary emergency evacuation routes also shown on Figure 2.7-3. (FEIR, subchapter 2.7.2.3.) All proposed roads have been designed in accordance to the County Consolidated Fire Code and would exceed the driveway minimum horizontal radius, fall within the 20 percent maximum allowable grade and meet or exceed the minimum paved width requirements. Specifics of the proposed roadway designs compared to the Consolidated Fire Code are detailed in the Road Standard Comparison Matrix, Attachment P of the FPP.</p> <p>With respect to concerns regarding the exceptions being requested for the roadway improvements, these exceptions were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.)</p> <p>With respect to the single evacuation route to the east and the roadway exceptions, the FEIR analyzed the issue of transportation hazards with respect to the road network designed for the project, and determined that impacts associated with transportation hazards would be less than significant. The overall road network design for the project would provide adequate ingress and egress for residents as well as emergency access and conform to General Plan Goal M-4. The roads within the project site were designed to accommodate emergency vehicles and allow residents to evacuate efficiently if necessary (General Plan Policy M-4.4) and the project would provide four connecting points to existing roads ensuring that both local and surrounding residents have alternate routes (Policy M-4.2). (FEIR, subchapter 2.3.3.3.)</p>
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LETTER

RESPONSE

	<p>I51i-17 (cont.)</p> <p>In addition, the project's evacuation routes lead to the north, west, south, and east which provide the best opportunities for moving residents and guests away from a wildfire threat. (Evacuation Plan, page 11.) It should be also noted that the project's emergency access has been reviewed by DSFPD, as a part of the FPP.</p> <p>With respect to the hypothetical scenario posed by the commenter regarding the lack of westerly evacuation routes, please see additional response to comment I51i-18 below.</p> <p>I51i-18 As a result of the findings of the fire modeling, project design features were incorporated into the project, including fuel modification zones, use of ignition resistant building materials, fire and building code requirements, provision of secondary emergency access roads and adequate water supply for fire hydrants. The FEIR found that with the adoption of mitigation measure M-HZ-1, impacts to wildland fires would be reduced to less than significant. (FEIR, subchapter 2.7.2.4 and FPP) Subchapter 2.7.3.4 of the FEIR also identified that the project's contribution to a potential cumulative impact would be less than cumulatively considerable with respect to wildland fire hazards based on the implementation of the FPP, associated landscaping plans, and mitigation measures. CEQA only requires analysis of reasonably foreseeable impacts. (CEQA Guidelines Section 15064(d).) This means that CEQA does not require analysis of impacts that are too remote or speculative. (<i>In Re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings</i> (2008) 43 Cal.4th 1143, 1173.) Therefore, CEQA would not require an EIR to engage in speculation such as provided by the examples of the commenter. Additionally, the Evacuation Plan explains that evacuations are fluid events and the incident command, law enforcement, and County OES would jointly enact evacuations based on fire behavior. For purposes of the Evacuation Plan, the first and most logical choice for all of the residents and guest within the boundaries of the project is to adhere to the principles and practices of the READY!SET!GO! Program and therefore education is a key element to the Plan. It is important for residents to make the decision to evacuate as soon as possible as it may take more than two hours to complete the evacuation process.</p>
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LETTER

RESPONSE

burned in more than 50 years. In steep terrain. On the Western Border of the proposed LHR Project.

The FPP recognizes that the prevailing winds are from the West.

What would happen in the following scenario? :

- An event, including but not limited to a sudden wildfire from the high fuel zone immediately to the West of the LHR Project requires sudden evacuation of the Project to the East?

There is but a single exit route for 5185 people – the narrow, twisting West Lilac Road to Lilac Road. If the evacuation event is caused by a large Wildfire from the West, the ensuing smoke plume will result in panic evacuation over a single treacherous road. There are over 40 existing residential driveways that intersect this section of West Lilac with semi-rural land uses.

What happens in a high smoke environment if a large pickup truck towing a horse trailer overturns and blocks both travel lanes of this road?

In summary, the Evacuation Plan ignores the most fundamental Evacuation issues of the proposed LHR project. The LHR Project Evacuation scenarios enumerated above create significant Safety Issues that have not, and cannot be mitigated.

This is a factual certain "impact to cause substantial adverse direct and indirect impact on human beings" under the California Environmental Quality Act (CEQA) and the County of San Diego must find a Mandatory Finding of Significance.

DEIR Chapter 2.7 Hazard Analysis – There are two sections of the Hazard Analysis Cumulative Impacts that directly relate to Fire Protection and Evacuation Plans for the proposed LHR Project:

2.7.3.3 Issue 3: Emergency Response and Evacuation Plans - The Applicant states that cumulative impacts are less than significant.

The Evacuation hazards enumerated in this letter raise factual and compelling Public Safety issues with respect to the proposed LHR project.

The LHR Project has not demonstrated that the project can meet the 5 minute Emergency Response requirement for Fire Services.

Addition of 5185 additional persons requiring automobile evacuation in this area that has one easterly and two westerly evacuation routes and no plans to add additional evacuation routes is a huge additive cumulative impact.

This is a factual certain "impact to cause substantial adverse direct and indirect impact on human beings" under the California Environmental Quality Act (CEQA) and the County of San Diego must find a Mandatory Finding of Significance.

2.7.3.4 Issue 4: Wildland Fires - The Applicant states that cumulative impacts are less than significant.

151i-18 cont.

151i-19

151i-20

151i-21

151i-22

151i-18 (cont.)

The Evacuation plan recognized that potential backups on the public roads and intersections may occur. In addition, there may be circumstances where it would be better for residents to take temporary refuge in schools, churches, and commercial buildings. Finally, for residents in the DSFPD, the Deer Springs Fire Safe Council offer a separate telephone system which residents can sign up for to provide residents with early warnings. (Evacuation Plan, pp 8-11.)

151i-19 Please see response to comment 151i-18. This scenario is speculative, and as noted above, CEQA only requires the analysis of reasonably foreseeable effects from the project. Therefore, no further response is required.

151i-20 Please see response to comments 151i-10 and 151i-17 above and Global Response: Fire and Medical Services.

151i-21 Please see response to comments 151i-10 and 151i-17 above and Global Response: Fire and Medical Services.

151i-22 This comment is an introduction to comments that follow. No further response is required.

LETTER

RESPONSE

The Applicant is correct in stating that the LHR Project eliminates fuel load by paving over wild lands and covering the land with asphalt and concrete. However, the Fire and Wildfire hazards enumerated in this letter raise factual and compelling Public Safety issues with respect to the proposed LHR project. The addition of 5185 additional persons requiring automobile evacuation in this area that has one easterly and two westerly evacuation routes and no plans to add additional evacuation routes is a huge additive cumulative impact to Wildland fire hazard analysis.

This is a factual certain "impact to cause substantial adverse direct and indirect impact on human beings" under the California Environmental Quality Act (CEQA) and the County of San Diego must find a Mandatory Finding of Significance.

I51i-23

I51i-23 Please see response to comment I51i-10 and I51i-17 above and Global Response: Fire and Medical Services.

Sincerely,

Mark Jackson
9550 Covey Lane
Escondido, CA 92026
760-731-7327

- Attachment A - June 12, 2012 DSFPD to Slovik Ltr. Re: TM – 5571 &72; LHR Project
- Attachment B - March 5, 2013 DSFPD to Slovik Ltr. Re: LHR Specific Plan
- Attachment C - August 10, 2013 DSFPD to Slovik Ltr Re: LHR Project DEIR
- Attachment D - September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road Taper
- Attachment E - June 25, 2013 Mountain Ridge Sight Distance Analysis
- Attachment F - June 25, 2013 Covey Lane Sight Distance Analysis
- Attachment G - Figure 27-1 Project Gated Access
- Attachment H – Figure 1.6 Fuel Modification Zones

I51i-24

I51i-24 With respect to the attachments, comments are addressed either within comment letter I51i, the FEIR, or FPP. No further response is required.



Deer Springs Fire Protection District

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

June 12, 2012

County of San Diego
 Department of Planning and Land Use
 5201 Ruffin Rd, Suite B
 San Diego, CA 92123

Attn: Mark Slovick, Project Planner

RE: FM-5571 & 5572, Lilac Hills Ranch

The following are the general comments of the Deer Springs Fire Protection District with regard to the Lilac Hills Ranch Project. It must be noted that these comments can only be made in general terms due to the limited information we have received from the developer.

As the Fire Authority Having Jurisdiction for the project, we find the following issues to be of concern:

- * The project is sited in a location requiring response times longer than allowed by both the County General Plan, and District guidelines. The developer's proposal to utilize the CAL FIRE Miller Fire Station as the primary fire station for the project is unacceptable. A timely response to incidents within the project will likely require relocation of the District's Headquarters Station #11. Determining the best course of action with respect to the siting of a replacement station would best be handled through hiring an independent consultant of the district's choice to conduct a "standards of cover" assessment for the Deer Springs Fire Protection District. This study would include the impact of the Lilac Hills Ranch Project as well as any proposed or likely development that might impact District operations in the future. This study would be conducted at the developer's expense.
- * Roadway lengths, widths, turnarounds, and modifications to existing transportation infrastructure as they relate to ingress and egress for emergency responders as well as for the evacuation of residents, need to be more thoroughly evaluated once additional information is available. Some elements of the submitted roadway designs are unacceptable by district standards. Hammerheads are not permissible for termination of roadways, and must be replaced with cul-de-sacs of no less than 36' improved unobstructed radius, plus parking.
- * The proposed traffic calming devices appear to reduce the available space to below acceptable turning radius requirements for district fire apparatus and may be modified or removed per Consolidated Fire Code section 503.4.1.

- All fire apparatus access roads shall be no less than 24' improved unobstructed width, plus parking.
- All backbone roads shall be completed prior to issuance of building permits, and all roads shall be constructed prior to delivery of combustibles including the proposed North/South road that will link West Lilac Road to Circle R Drive. Further, the North/South road should be a public road consistent with all applicable County public road standards and the fire code and provide for secondary ingress and egress prior to the first phase of the project.
- Dedicated public north/south and east/west circulation shall be addressed. (CFC 503.2.1)
- Provide full road circulation for all phases.
- More detailed information regarding the types, sizes and uses of structures within the project is needed for a full evaluation of the impacts on the district's response capabilities. Multi story structures, commercial development, solar plant, sewage treatment, and senior living facilities have been mentioned by the developer, but no specific information regarding these structures has been submitted. This will make all-hazards response planning impossible.
- Fire access to open space areas must be provided. Further, islands of vegetation and open space areas must be kept fire safe or modified to the satisfaction of the fire code. A homeowners association should be established to provide for the maintenance of fire safe conditions of fuel modification zones in perpetuity.
- All fire hydrants will be installed and serviceable by all applicable code standards prior to the delivery of combustibles.

Sincerely,



Chris Amestoy
Fire Chief
Dear Springs Fire Protection District
(760) 749-8001

Cc: Cathey Michna, Fire Prevention Specialist, DSFFD
Cc: James Pine, Fire Marshal, SDFCA (via email)
Cc: Greg Griswold, Deputy Chief, CAL FIRE (via email)
Cc: Ralph Steinhoff, Fire Services Coordinator, SDFCA (via email)

Attachment B - March 5, 2013 DSFPD to Slovik Ltr. Re: LHR Specific Plan Page 1 of 3



Deer Springs Fire Protection District
8709 Circle R Drive • Escondido, CA 92026
Tel (760) 749-8001 • Fax (760) 749-6572

Tuesday, March 5, 2013

County of San Diego
Department of Planning and Land Use
5510 Overland Ave., Suite 321
San Diego, CA 92123

Attn: Mark Slovick, Project Planner

Subject: Lilac Hills Ranch Specific Plan
TM 5571, TM 5572
SP12-001

The DSFPD has conducted a review of the above listed Specific Plan.

I have reviewed the report and have outlined the necessary requirements and concerns.

The DSFPD requires that this site will comply with the following and adhere to current Fire codes, Building codes and County codes applicable at the time of Project start:

INTRODUCTION, page I-6:

2. Water Resources- This project is serviced by the Valley Center Municipal Water District (VCMWD) which requires that the fire protection systems service meters be a minimum of one inch (1"), and will be separate from the domestic supply. DSFPD may require a larger meter size, dependent upon building type and usage.

SPECIFIC PLAN SUMMARY, page II-7:

1. Land Use Distribution- (a.) Phasing- The Deer Springs Fire Protection District (DSFPD) will require that the roadway infrastructure, along with all fire hydrants be installed prior to the allowance of combustibles on the project site.

Page II-18:

3. Community Recreational Elements- (c.) Community Trail Network- With a proposed trail network of over 16 miles there needs to be several areas that will be accessible to the fire department for emergency incidents on the trails. Please add these access points to the plan for fire department approval.

Attachment B - March 5, 2013 DSFPD to Slovik Ltr. Re: LHR Specific Plan Page 2 of 3

Page II-19:

D. Circulation Plan- 1. Streets- (b.) Private Roads- The specific plan refers to all roads within the development as being private and many of the proposed streets do not comply with the County of San Diego Private Road Standards or with the County Fire Code minimum roadway standards. DSFPD has concerns with the one lane one-way Main St. proposal. The street is identified as the most travelled roadway in the development and such a design will not be approved as is. Deer Springs Fire Protection District would consider the one-way roads with the removal of parallel street parking. With the elimination of parallel parking the travel lane would then be sixteen feet (16'), giving fire apparatus an adequate amount of space to pass vehicles in the event of an emergency response. The development's current roadway design greatly limits fire department access and DSFPD is concerned with the install of roundabouts and alleyways greatly impacting fire department response times. The Traffic Calming Intersection Neckdown will not be accepted in this project.

Figure 24- Project Internal Circulation:

All automatic gates located within the development are required to have a Knox key switch override system along with an approved emergency traffic control-activating strobe light sensor(s), i.e., Opticom. The map indicates that there will be a total of five automatic gates: starting near Circle R Dr. on Mountain Ridge Rd. and ending at Covey Ln. The amount of gates and their locations will impact fire department response times in to these areas.

Figure 29- Typical Street Section:

Main Street (On-site) - Minimum acceptable travel lane width is fourteen feet (14') unobstructed width. Plans show that the proposed travel lane will be twelve feet (12'), DSFPD will accept no less than the minimums on this project. All trees planted in the center median will maintain, at all times, a clearance of 13' (ft) 6" (in) over all roadways.

DEVELOPMENT STANDARDS AND REGULATIONS; page III-13:

D. Site Design/Landscape Design- 1. Landscape Concept- Lilac Hills Ranch is located in a high wildland fire area and will be difficult to access; therefore a minimum FMZ (fuel modification zone) of 100' (ft) will apply to all areas of Lilac Hills Ranch. A landscape plan is required for this project and will need to be submitted to DSFPD for approval.

Page III-24:

9. Fence Concepts- Any fencing located less than five feet from a building will be non-combustible.

Page III-38:

c. Architecture- Garage/Driveway Design (iv.)- Pavers are not designed to support the load of a fire apparatus not less than 75,000 lbs, making pavers an unacceptable driveway material.

Page III-45:

F. Fire Protection Plan (FPP)- Standards 1.- The FMZ (fuel modification zone) will be a minimum of 100' (ft) throughout, but can be increased by DSFPD if necessary.

TOWN CENTER SECTIONS- FIGURE 75, 76 & 77:

North/South Main St.- Please eliminate parallel street parking as a way to mitigate DSFPD concerns and allow for unobstructed emergency access on these one lane one-way streets.

LETTER

RESPONSE

Attachment B - March 5, 2013 DSFPD to Slovik Ltr. Re: LHR Specific Plan Page 3 of 3

IMPLEMENTATION; Page IV-6:

1. Required Facilities- e. Fire, Paramedic and Law Enforcement Services and Facilities- The Lilac Hills Ranch project is located within the service area of Deer Springs Fire Protection District in cooperation with CalFire. A total of three fire stations (Station 11, 12 and 13) make up the District; with Station 11, located at 8709 Circle R Dr. being the closest response. The Specific Plan calls for the Miller Fire Station to be the main provider of emergency services to the development. This is an incorrect statement; the Miller Fire Station is a CalFire station and is not a part of the Deer Springs Fire Protection District. Miller does not have the staff or equipment on the type 3 engine to handle any volume of ALS (advanced life support) medical emergencies, and does not carry the size of fire hose needed on a structure fire response. Along with that, Miller is no longer considered a "must cover" station, and may not be staffed at the time of an emergency. Please reflect this change on the plans.

Please add this document to the case file as a fire condition

If you have any questions, please call the Deer Springs Fire Protection District at (760) 749-8001.

Sincerely,

Alicia M. Perry

Alicia M. Perry
Fire Prevention Specialist
Deer Springs Fire Protection District
aperry@dsfd.sdcocmail.com



Deer Springs Fire Protection District

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

August 10, 2013

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

Mr. Slovick,

The following are comments of the Deer Springs Fire Protection District in reference to the Lilac Hills Ranch Proposal (TM-5571, TM-5572, SP 12-001).

Service delivery options for the proposed development:

The proposals of the developer have consistently held that the CAL FIRE Miller station is the closest and therefore most appropriate fire station location for service to this project. This is a position that is not, and will not be supported by the Deer Springs Fire Protection District (DSFPD). The assumption that the Miller Fire station will be location of primary responders for fires and other emergencies on the project should be summarily dismissed. CAL FIRE is not the fire agency having jurisdiction and the idea of co-located facilities with the DSFPD assumes a permanent relationship between the agencies and presents significant complications should there be changes to either the CAL FIRE deployment strategy in the area, or a contractual change with the DSFPD or the SDCFA. It must be recognized that the District does not and cannot accept conditions pre-dictating ongoing relationships with other agencies or siting of permanent facilities based on current relationships that may not be similarly permanent.

Further, the District is unable to support an additional facility for provision of a level of service within the project comparable to that received by existing residents based on the projected revenue generated by the project at build-out. The District cannot accept any proposals for service that are fiscally untenable, as it jeopardizes the ongoing provision of service to existing residents. The District is not inclined to consider staffing options that significantly depart from the standard level of service currently provided in the District. Presently, the District provides response with advanced life support engines with three career personnel. Alternate staffing arrangements are not an option as it would result in a disparate level of service at the same or greater level of tax burden.

LETTER

RESPONSE

Given the aforementioned issues, it is the position of the District that in dealing with response to the Lilac Hills Ranch Proposal, there are the following options:

Option 1:

Relocate the existing Station 11 to an agreed upon location within the project area.

This option would place a replacement facility for the current Station 11 within the project. This option would require a site location that would meet the specified general plan response time needs while maintaining an adequate response to the current residents of the District. A location within the project meeting these criteria is most likely to exist in the southernmost portion of the proposed development. This option will likely require some roadway modifications to satisfy response times to the northern end of the project especially given the phasing plan. Under this option the district would prefer to see unrestricted north/south access through the project with a minimum of traffic calming devices. Additionally, this option will require an evaluation of potential off-site road improvements to Circle R Drive.

A location for this facility would require an evaluation of available sites, and modeling of response times to both the project and existing properties in the district. The cost of this study would be borne by the developer.

It should be noted that Station 11 is a headquarters facility and replacement of the facility will require replacement of the headquarters functions that meet or exceed those currently in place.

Option 2:

Relocate the existing Station 11 to an agreed upon location outside of the project area.

This option would place a replacement facility for the current Station 11 on a site outside of the project but in a location suitable for achieving acceptable response times for both the project and for existing residents. A location suitable would need to be located through a comprehensive evaluation of available properties and based on modeling of response times. It is likely that some modifications to roadways would be necessary to facilitate response times to areas of the project in order to achieve adequate response.

A location for this facility would require an evaluation of available sites, and modeling of response times to both the project and existing properties in the district. The cost of this study would be borne by the developer.

It should be noted that Station 11 is a headquarters facility and replacement of the facility will require replacement of the headquarters functions that meet or exceed those currently in place.

It should be noted that neither of these options requires the support of additional staffing or equipment. The district feels that these are both realistic options that deserve maximum consideration in the development of this project.

LETTER

RESPONSE

Additional Comments:

The FPP continues to have factual inaccuracies regarding the district. The Deer Springs Fire Protection District (DSFPD) operates 3 fire stations (Stations 11, 12, and 13), with 3 front line Type I engines, 2 reserve Type I engines (unstaffed, with one at Station 11, and one at Station 13), 1 Type III engine (Station 12). The district does not employ a fire marshal, but has had a Fire Prevention Specialist during the scope of the FPP's development. The District also employs 1 administrative employee, not 2 as listed.

For purposes of clarity, the Miller Fire Station exists in support of the CAL FIRE mission of suppression of wildland fires in State responsibility areas (SRA). While they represent an important part of the cooperative fire protection system in the region, their statutory mission is to respond to State wildland fires. The station is not equipped or staffed based on the needs of a typical suburban fire department. Even if supplemental staffing or equipment was provided, it is likely that fire activity elsewhere in the state might pull that resource out of the area for protracted periods of time. The "must cover" concept mentioned in the FPP only provides that a CAL FIRE engine from another area of the county or the state (the most recent significant coverage was provided by an engine from San Luis Obispo) will assume coverage of the station at some point. This may cause difficulties in expecting consistent service at a level above what is typically provided by CAL FIRE funded engine companies. Assuming that the development of this project in any way alters the fundamental responsibilities of CAL FIRE is incorrect.

The Miller Fire Station, while in the District, is wholly operated by CAL FIRE during the majority of the year and is not in any way under the operational control of the DSFPD. This relationship can be confusing due to the contractual relationship for staffing with CAL FIRE presently in place within the DSFPD. Additionally, it should be noted that the staffing at the Miller Station during the "Amador" period that is supported by the San Diego County Fire Authority is only 2 personnel, not the 3 personnel that is the standard on DSFPD resources. The Miller Station is a non-paramedic level facility year round.

Finally, the District will expect any project to be built in full compliance with all existing standards, codes, and ordinances for the purpose of providing the maximum level of fire and life safety for our future residents, and for the continuing safety of our responders.

This proposal is of significant concern to the Deer Springs Fire Protection District. If you have any questions or concerns, please contact me at (760) 749-8001.

Sincerely,

Chris Amestoy
Fire Chief
Deer Springs Fire Protection District
8709 Circle R Drive
Escondido, CA 92026

Attachment D - September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road Taper Page 1 of 5

REDUCED DESIGN SPEED MOUNTAIN RIDGE ROAD

DEPARTMENT OF PUBLIC WORKS

Request for a Modification to a Road Standard and/or to Project Conditions

Project Number: RW 68716672 Date of Request: 09/11/2012
Project Location: East Side of Inkarota St., southerly of W. Leticia Road in the County of San Diego, State of California.
Thos. Bros. Map/Grid: 1149 - 1159 APN: 23-025-06-120-0000-000-0000-000-0000
Requestor Name: Scott's Fine Investments, Inc. Telephone: 619-443-8769
Address: 22775 St. Charles Road, Suite 110, San Diego, CA 92128

Requested Modification (attach engineering sketches showing existing layout, details and notes):
The Private Road standard street section is 24' paved, 12' graded within a 4' easement. This Attachment is based on the average daily traffic. The minimum design speed is 25 mph for Mountain Ridge Road. The requested modification to the road standard is to allow for a 15 mph design speed over this existing private road that was previously built to 15 mph standards as established in an adjacent jurisdiction.

Reason for requested Modification (provide attachment if additional space is required):
The requested road modification pertains to Mountain Ridge Road (private) north of Clark & Esch near Attachment 1. At a 15 mph design speed, the existing road would have to be completely rebuilt. Existing vertical curves would have to be completely redesigned which would result in some existing driveways no longer being accessible when they are on the edge or end of the existing curves. These driveways would have to be modified and rebuilt while still access is maintained. Ideally, the newly designed road would require permission to grade from adjacent jurisdictions. The cost and time to complete these activities would be prohibitive if they would have to occur from adjacent jurisdictions.

List alternatives that could mitigate the requested Modification (attach engineering sketches showing proposed layouts, details and notes):

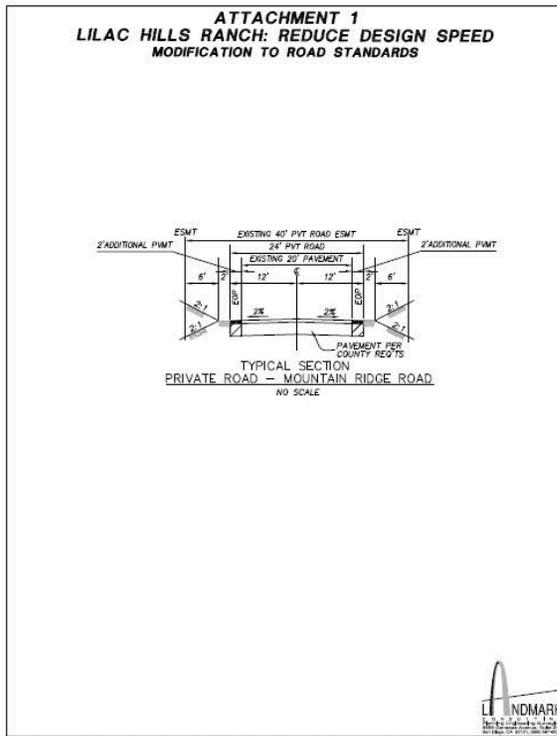
Describe the hardship(s) to the property owner(s) and/or neighbor(s) if the request is not approved (see note 3, on reverse):
The impact to the existing homes on this road would be tremendous and the need for permission to grade across from a large number of neighbors could cause serious delays and/or fill this project. Also, the additional costs to reconstruct this entire road and for many large maintenance wells would be prohibitive. Because of some of the existing driveways (or the signs or gates) may not always be possible. Finally, the existing 15 mph design standard would be reduced to the design speed and construction.

Provide Design and Cost Estimate for meeting the Condition (see note 3, on reverse):

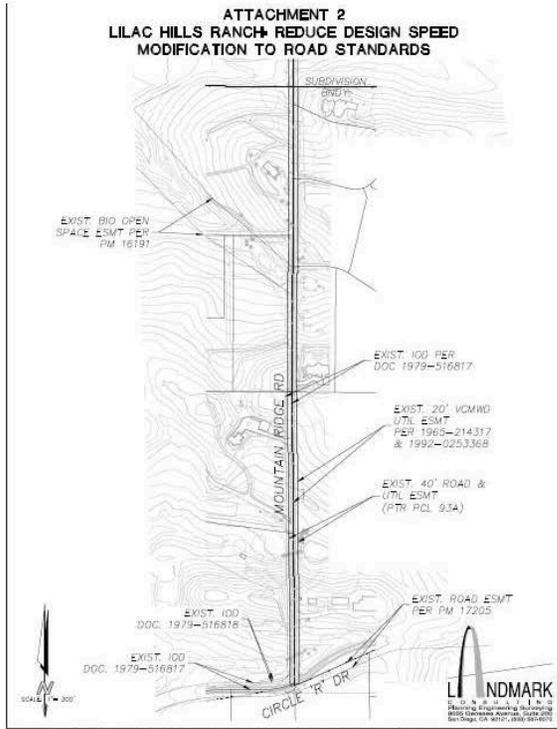
See reverse for directions and important information.

Revised: Aug 30, 2007

Attachment D - September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road Taper Page 2 of 5

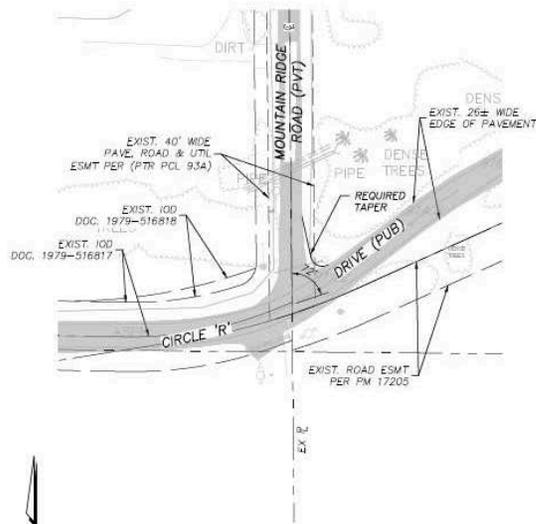


Attachment D - September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road Taper Page 3 of 5



Attachment D - September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road Taper Page 5 of 5

ATTACHMENT 1
LILAC HILLS RANCH: TAPER FOR RIGHT TURN MOVEMENT
MODIFICATION TO ROAD STANDARDS





June 25, 2013

Mr. Jon Rilling
 Accretive Capital Partners, LLC
 12275 El Camino Real, Suite 110
 San Diego, CA 92130

RE: Lilac Hills Ranch (TM 5571) - Sight Distance Analysis at Circle R Drive and Mtn Ridge Rd

Dear Jon:

Per your request, we have conducted the Sight Distance Analysis at the intersection of Circle R Drive and Mountain Ridge Road in Valley Center (see Figure 1 - Vicinity Map) to determine adequate sight distance per the San Diego County Public Road Standards requirements. For this analysis, it was assumed the existing alignment of Mountain Ridge Road would remain the same as it approaches Circle R Drive from the north.

The speed survey was completed between September 11, 2012 and September 16, 2012 by National Data and Surveying Services. Average speeds range from 34.7 to 37.0 mph while the 85th percentile, speeds were in the range of 41.3-44.0 mph (see table below). For this analysis, a 45 mph prevailing speed was used. Per the County of San Diego sight distance requirements, the minimum corner intersection sight distance is 450' for a prevailing speed of 45 mph.

Circle R Drive, just east of Mountain Ridge Road						
	ADT	Average Speed (mph)		85th Percentile Speed (mph)		Heavy Vehicle %
		EB	WB	EB	WB	
Weekday	1,822	34.7	36.7	41.3	44.0	2.0%
Weekend	1,407	34.5	37.0	41.5	44.0	2.5%

The line of sight from Observation Point 'B' looking east is of 450' has been achieved due to recent clearing performed in April 2013 along the existing public road within APN 129-390-18 between the existing pavement of Circle R Drive and an existing public road easement granted per PM 17205. It is recommended that this area be kept clear by means of preventative maintenance to maintain adequate sight distance at this Intersection. The County has prescriptive easement rights to this portion of Circle R Drive, a public road. Since the required clearing area is between the existing pavement to the north and an existing public road easement to the south, the County should have the right to clear this area to establish the required line of sight to assure public safety for the use of this existing public road as part of their normal maintenance responsibilities. However, a clear space easement should be obtained over this area (as illustrated on Figure 2) from the offsite property owner (APN 129-390-18) to ensure maintenance rights in perpetuity. Additionally, this clearing area falls within the 50' fire buffer area required by the Deer Springs Fire Protection District along all existing property lines.

The current line of sight for the eastbound traffic as seen from Observation Point 'B' on Mountain Ridge Road looking west toward Object Target 'C' on Circle R Drive is also adequate and neither maintenance nor clearing is recommended at this time.

Profiles through both lines of sight and photos are provided for clarity (Figures 3-6).

If you have any particular questions or require additional information, please do not hesitate to call.

Sincerely,
 LANDMARK CONSULTING



Mark A. Brencick, P.E., P.L.S.
 President

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• 9555 Genesee Avenue, Suite 200, San Diego, CA 92121, Ph: (858) 587-8070 Fax: (858) 587-8750 •

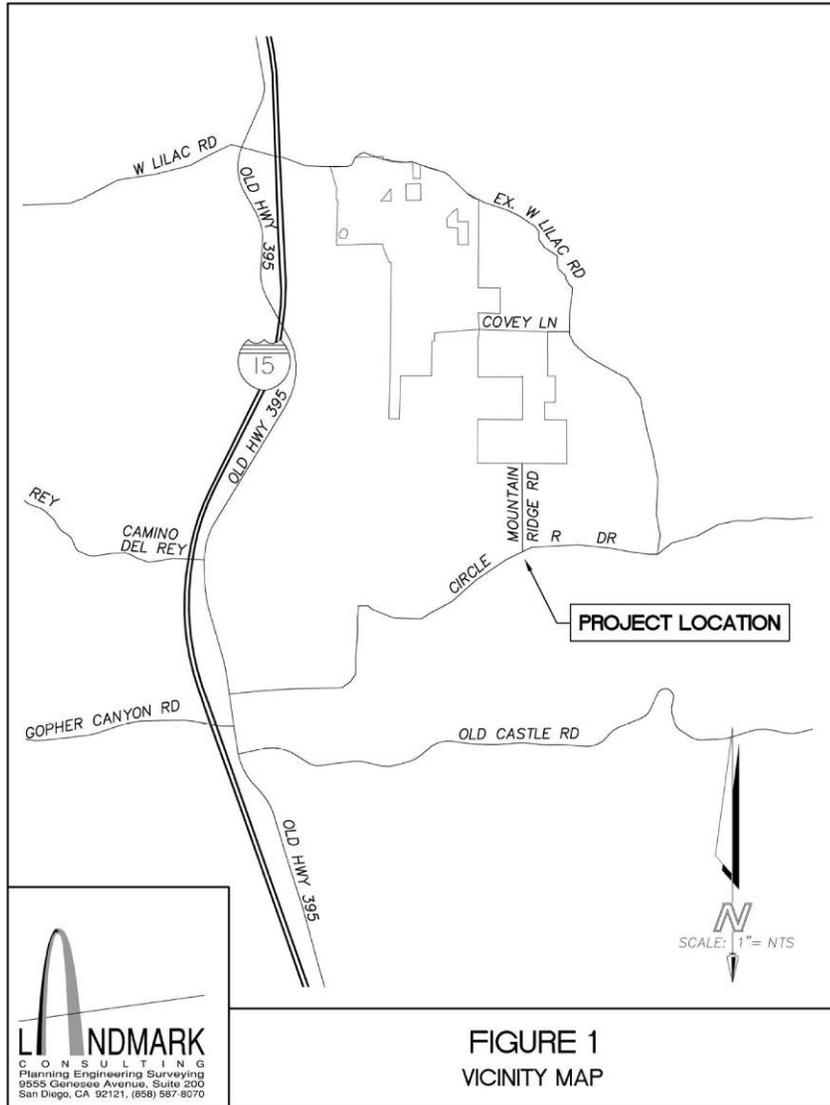


FIGURE 1
VICINITY MAP

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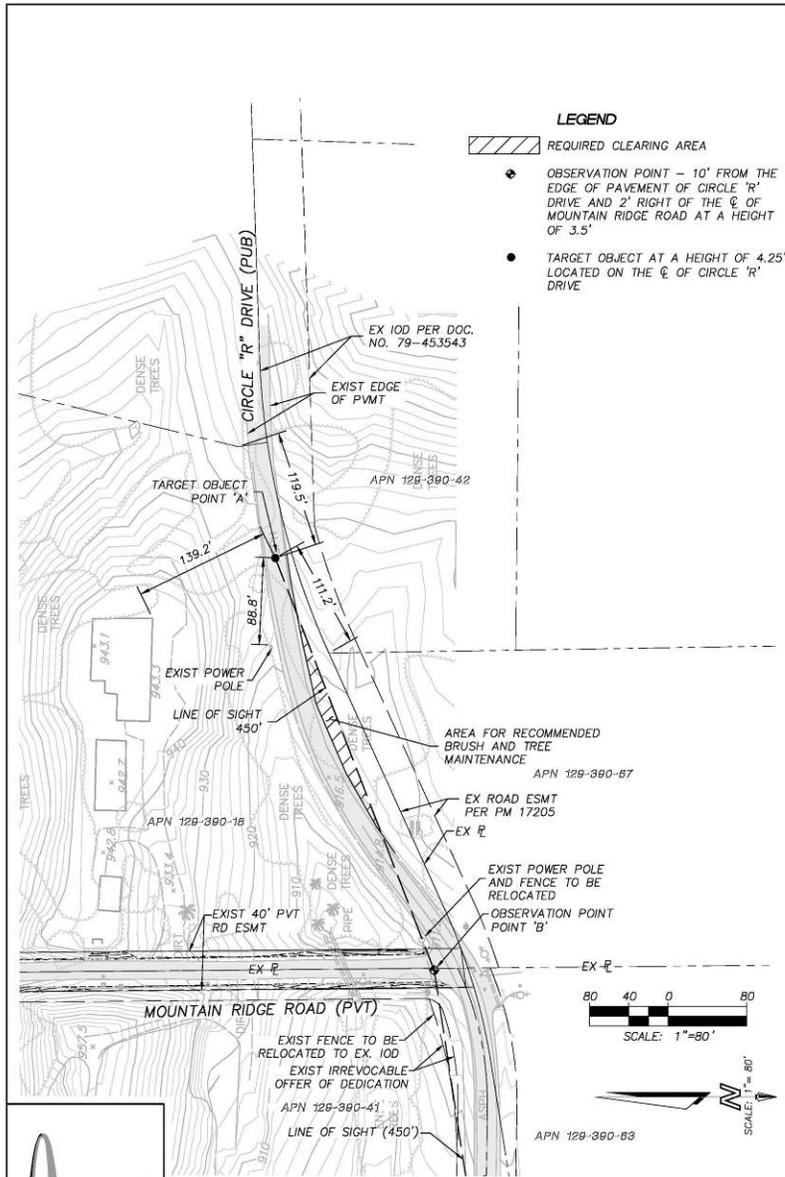
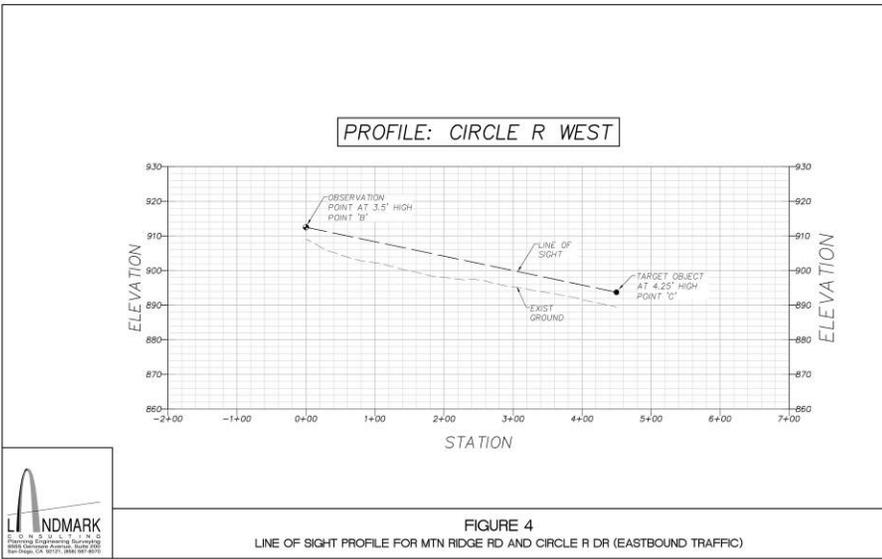


FIGURE 2
SIGHT DISTANCE ANALYSIS
CIRCLE R DRIVE AND MOUNTAIN RIDGE RD



LETTER

RESPONSE



\\projects\00-1\lndmark\11000 N. 110th St., Suite 100\Edmonton, Alberta T6E 4E1\Drawings\00-1\11000 N. 110th St., Suite 100\11000 N. 110th St., Suite 100.dwg, 1/13/2015 8:58:11 AM, 1:1

PHOTO: 05-01-2013



FROM MOUNTAIN RIDGE ROAD LOOKING WEST ONTO
CIRCLE 'R' DRIVE

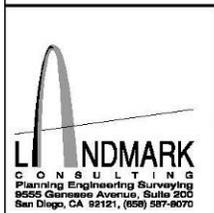


FIGURE 5
PHOTOS

PHOTO: 05-01-2013



FROM MOUNTAIN RIDGE ROAD LOOKING EAST ONTO
CIRCLE 'R' DRIVE

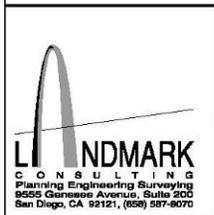


FIGURE 6
PHOTOS