

COMMENTS

RESPONSES

Review of Fire Protection Plan (March 12, 2015) for Viliano Development

June 15, 2015

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RE: Valiano Specific Plan PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-REZ-13-001, PDS2013-TM-5575, PDS2014-MUP-14-019, PDS2013-STP-13-003, PDS2013-ER-13-08-002 (The Valiano project by Integral Communities located in Eden Valley and Harmony Grove)

These comments are provided on behalf of the Elfin Forest/Harmony Grove Town Council

Review of Fire Protection Plan (March 12, 2015) for Viliano development

L-1 The Fire Protection Plan (12 March 2015) (FPP) applied models of fire behavior (BehavePlus 5.0.5) to develop standards for the construction, setbacks, and treatment of fuels for the proposed Valiano development. It developed a "potential menu of requirements" and some recommended standards based on local fire codes and worst-case regional weather conditions, consistent with FPP content requirements and County guidelines. It complies with the requirement of local and state government with regard to a permit application for development to minimize structural ignitions within the new development, and for providing access by emergency responders to suppress a structural or vegetation fire within the development itself. It provides for 150-foot fuel treatment zones, based on estimated flame lengths from expected tall shrub fires.

L-2 However, it does not address the increased fire danger posed for the entire community outside the development. The FPP recognizes that the Valiano project will result in increased risk of fire (FPP p. 13), but only the protection of new Valiano homes is addressed. "As the density of structures and the number of residents in the [wildland-urban] interface increases, potential ignition sources will multiply and [potential for] a large wildfire occurrences increases." The Elfin Forest/Harmony Grove area is hazardous as a trap for fire, for smoke, and for impeded evacuation.

L-3a The Valiano proposed development is located in a Very High Fire Hazard Severity zone (see map; areas mapped as moderate hazard were probably assumed to be irrigated). The area has significant fire history. See the attached map of fires of at least 5 acres in size; this map does not include the approximately 24 vegetation fires per year extinguished by the San Marcos Fire Department (FPP page 13) and which were not large enough to become part of the CalFire database (see map). The fact that, before the Cocos fire, no "large fire" (FPP page 13) had been recorded in the vicinity in the past 50 years,

L-3b is only evidence that the local vicinity is next in line to burn (see work of R. Minnich correlating fire hazard with vegetation stand age). Furthermore, the FPP mentions existing and past agricultural activity (irrigated groves) as the reason for the lack of recent fire history, but these groves are now dead and a fire hazard. This statement about lack of fire history does not acknowledge adjacent native vegetation in a mature condition, which indeed was set aflame in the Cocos fire. Please refer to the attached maps of the Cocos fire and fire history. All areas with native or unirrigated vegetation are expected to burn in the coming decades (See FPP map page 14).

L-4a The models applied in the FPP are for a uniform fire approaching a structure, and what can be done to mitigate possible fire damage by applying fire safe construction, buffered fuels, and firefighter access by optimizing response times and access for fire apparatus. The FPP applied regional worst-case fire

L-1 Comment noted. The comment is not at variance with the environmental document.

L-2 The commenter is concerned with fire safety including evacuation for the entire community. See Topical Response: Fire/Evacuations and Response K-65.

L-3a Comment noted. The comment is not at variance with the environmental document. No further response is necessary.

L-3b The analysis ensures that established fire codes of local fire agency are followed and mitigation measures are proposed to ensure that wildfires do not create fire safety and welfare concerns for the residents and visitors of the Project and the surrounding areas. Also Response I-59.

The FPP (Appendix L of the Final EIR), in Section 1.4.2 and 1.4.4, addressed this comment with inclusion of information about the Cocos Fire and that it did burn a large portion of the avocado grove and surrounding mature native fuels. It also establishes that the Valiano HOA would have responsibility for management of these orchard areas, and that the SMFD would have the authority to remove them if they become unmanaged or die.

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L-4a cont. scenarios in compliance with County guidelines in order to estimate the benefit of buffer distances, fuel treatment, and firesafe construction in the development. The scenarios included a typical summer day, a Santa Ana condition, and a peak-gust Santa Ana condition. All assumed fuels composed of tall shrubs (the sh7 fuel model cited). The fire behavior calculations in the FPP added assumptions for more extreme fire conditions than those required by county FPP report content, and more extreme than those used by the San Marcos Fire Department in their Community Wildfire Protection Plan. While these are regionally important and facilitate a demonstration of the benefit of fuel treatment in protection of the new homes, the approach is not designed to evaluate the fire safety of the community at large.

L-4b

L-4c Moreover, the road width considerations are designed to provide access to firefighting equipment to fires within the development, but not to address the loss of firefighting capability during a regional fire siege as has occurred three times since 2003, nor address people needing shelter or to leave the area during dangerous fire conditions when suppression resources are unable to keep pace with eminent danger.

L-4d

L-5a Problem fire scenarios described in the FPP were regional in nature and not local to the Valiano development. For example, two of the scenarios considered, Santa Ana and Santa Anas with extreme gusts, are with winds coming from the north and northeast. Santa Ana winds generally overtop the valley, and fire danger occurs with the collapse of the Santa Anas and upcanyon or southwest winds replace the northeast winds, such as when winds lay down and shift direction overnight. Since there is little fuel connectivity to the north and east of the valley; the FPP properly recognized that the primary problem posed by the Santa Anas would be embers flying into the valley from distant fires (up to two miles or more away). However, the fire planners did not consider the reality of the Santa Ana condition in the evening when winds shift to come from the south and west up canyon. This scenario can use the canyon systems and slopes as fuses to carry the fire back to towards the Elfin Forest/Harmony Grove area; moreover, this is where the most hazardous fuel condition exists. The models should represent where the fuels are located adjacent to the development, even under moderate conditions.

L-5b

L-5c

L-5d

L-6a Here are some of the real problem scenarios for Elfin Forest/Harmony Grove: Another fire storm like in 2003, 2007, 2014, with suppression units deployed all over the county. People must evacuate or take shelter by themselves with suppression resources challenged and triaged across the region. Suppression resources are coming from national sources. Embers are entering the community from fires elsewhere burning to the north and northeast. Embers are landing on the planned open space and corridors of the development, or any burnable structure or dry landscape. In the evening when Santa Ana winds die down and become up-canyon winds, the community is threatened by fire from the south and southwest due to extremely dry vegetation and stretched suppression resources, with blocked exits.

L-6b

L-6c

L-7a The FPP recognized that the most hazardous vegetation loading on the west and southwest exposure of the development. The Cocos fire was fueled by this vegetation. While the Cocos fire is mentioned (it occurred about two years after the initial site visit by fire planners), it is not considered or modeled except for fuel treatment for new homes where the heavy fuels occurred. It was not an extreme Santa Ana fire. Cocos traveled from West to East. Winds were not extreme based on the closest RAWs (fire weather station) for which we could find a record (Valley Center RAWs 15 mph – this should be compared to records of the local fire department) (please refer to map). Relative humidity was extremely dry (4%). The Burn Index was high (131). The Energy Release Component (ERC) was a moderately high 75 (proportion live/dead fuel moisture by size class of fuel and a measure of the expected heat of flaming fire front). This ERC probably reflected the late spring time of year. Unseasonal

L-7b

L-4a Comment noted. The comment is not at variance with the environmental document. No further response is necessary.

L-4b Comment noted. The comment is not at variance with the environmental document. No further response is necessary.

L-4c The commenter is concerned with the fire safety of the community at large and the loss of firefighting capability during a regional fire. See Responses I-59, K-184 and K-199.

L-4d The FPP was revised to address this comment with information in Section 4.9 about evacuation and services available when asked to evacuate the area. There have been great advancements in evacuation procedures after the regional fire sieges of 2003; for example, notifications to evacuate by way of the reverse 911 system. There are many other programs available to inform and prepare residents for emergency evacuations through such programs as AlertSanDiego and other County emergency operation sources. See Topical Response: Fire/Evacuations.

L-5a The assumptions for worst-case scenarios are based on extreme weather conditions, including historic Santa Ana winds, which prevail primarily from the north to northeast. For the calculation of fire behavior parameters, these winds (using 60 MPH as extreme) have been recorded in these areas during worst-case scenarios.

L-5b See Response L-5a. Also, for clarification, it is recognized that the shift in direction of winds during the night can occur (and did occur during the Cocos Fire). However, it is important to understand the regional implications of strong erratic winds from the north and northeast for both source and nature during a fire siege.

L-5c Incident Management includes fire behavior specialists who predict and document in Incident Action Plans the appropriate operation plans for an incident. These fire behavior plans predict unusual winds and other factors which may affect fire fighting operations. This would include unusual winds (e.g., Santa Ana winds) and expected normal up canyon or down canyon winds.

The FPP addressed this matter by developing scenarios with both worst-case weather conditions and prevailing winds conditions. These scenarios developed in the FPP would provide fire planners expected fire behavior and fire parameters (rate of spread, fire intensity, and flame lengths) to be expected in the event of a wildfire in this specific area.

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- L-5d The FPP recognized where the most hazardous fuels exist. With the redundant layering of fire protection features that have been proven to increase ignition resistance of structures and landscapes, these features provide significant fire protection and communities are less vulnerable to wildfire, with the ignition of the most hazardous fuels.
- L-6a The commenter is concerned with evacuation for the community at large and firefighting capacity during regional fires. See Responses I-47 and K-184.
- L-6b The FPP recognized that embers would be the greatest risk and potential impact to the Project. See Response L-5d.
- L-6c With the redundant layering of fire protection features that have been proven to increase ignition resistance of structures and landscapes, there is significant assurance that the Valiano Project would not be the source and ignition point for a fire. The important point and lesson to learn with this comment is that creating a fire-safe environment with proven vegetative modification, ignition-resistant structure protection would greatly influence the safety and protection of communities in the path of a wildfire no matter which way a fire is moving. Also see Topical Response: Fire/Evacuations, K-184 and K-199.
- L-7a Comment noted. The comment is not at variance with the environmental document. No further response is required.
- L-7b The Cocos Fire was a disastrous fire and with different weather conditions than the FPP assumptions used to calculate fire behavior parameters for a worst-case scenario. The use of the more extreme assumptions in the FPP were used to provide the fuel modifications and other enhanced mitigations to ensure the greatest protection to structures within the Project.

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L-7b cont. dryness and drought condition of vegetation plus low humidities resulted in hazardous fire conditions more than winds. The first evacuations were ordered a little over an hour into the fire, with continued expansion of evacuation orders for the next 24 hours or so. A little over 4 hours into the fire it was demonstrating, according to the After Action Report, “extreme fire behavior, spotting, and critical rate of spread.” It was 500 acres at that time, and spreading by spotting and its own fire-generated weather system. Consequences: Burned 1,995 acres; 36 homes lost; \$10MM in damages; **51,000 were called to evacuate**; 164 fire engines; 27 hand crews; 11 dozers; 15 aircraft; 1,300 personnel.

L-7c While the FPP mentions the critical fire scenario of embers spotting from fires distant from the proposed development; it does not carry this forward except to require ember-resistant construction features in the new homes, sprinklers on homes, and the removal of unirrigated vegetation. Embers are likely from chaparral, coastal sage, eucalyptus, and riparian vegetation two miles or more from development, or within the development and a fire start from an ember can be from anywhere in the valley.

Fire planners should:

- L-8 • Consider whole valley community fire scenarios.
- L-9 • An area/community fire plan should be completed with boundaries defined that are more logical for fire management than an individual cluster of homes.
- L-10 • A community safety zone should be planned to take people and horses to as evacuation routes may be clogged.
- L-11 • Model other problem fire scenarios including fine fuels (the areas mapped as non-native grass) for rate of spread in relation to people and evacuation. These were left out of the modeling because they do not relate to structural fire protection, for which the extreme heat and flame lengths of a shrub fire were used. Fine fuels (less than ¼ inch as in grassy vegetation) directly relate to the speed of a wildfire. Such fires spread faster than shrub fires, and are more likely to result in entrapment of firefighters or residents. Such fire scenarios should be used for evacuation and suppression planning.
- L-12 • Represent the likelihood of embers from distant fires landing on dry vegetation and igniting fire from anywhere within the community.
- L-13 • Analyze moderate to high hazard fires from the southwest (Escondido Creek) and west (dead avocado grove and adjacent chaparral – Cocos fire). The moderate condition fires are instructive due to connectivity of fuels in that direction, and there is a higher chance that preemptive fuel treatment and suppression planning could prevent a moderate fire from becoming catastrophic, and perhaps minimize the need to evacuate.
- L-14 • Remove the consideration of irrigated agricultural groves from fuel model assumptions.
- L-15 • Consider recommending community restriction on days when Burn Indices or ERC’s in a condition where almost anything will start a fire due to extreme dryness of fuels and low relative humidities, gusts (e.g. red flag days). No construction activity, no generator use in vegetation, no spark-producing equipment use in vegetation, no smoking, etc. There is a lost opportunity to predict problem fire scenarios based on RAWs indices, and reduce risk of ignitions by restricting use of outdoor ignitions.
- L-16 • Provide for small/large animal evacuation.
- L-17 • Analyze evacuation choke points mentioned by other reviewers.

L-7c The commenter is concerned with fire starts from embers that could be located anywhere in the valley. The FPP recognized that embers would be the greatest risk and potential impact to the Project. See Responses K-190 and L-5d. The measures described in the responses listed and the FPP would provide significant protection from ember fire starts anywhere in the valley.

L-8 The FPP evaluated the consistency of the Proposed Project with applicable fire protection regulations. It considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions, and fire history. It considers water supply, access, structure ignitability, fire resistive building materials for residential structures, technical guidance for protection of commercial structures, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management for the Project site. See Response I-59.

L-9 The commenter requests that a regional fire plan be prepared. See Response L-8.

L-10 Evacuations are fluid operations. There are safety zones available on-site and off-site, but it is advisable to perform this through the notification procedures by the Sheriff’s Department (a member and part of the Incident Command). Also see Response I-62.

L-11 The commenter is concerned that the FPP did not account for fine fuels (non-native grass) in the modeling. The fuel modeling program used to calculate fire behavior parameters accounts for these factors.

L-12 The FPP recognized that fire embers are the greatest risk for starting a fire in the area; see Response I-59.

L-13 The commenter requests that the FPP analyze moderate to high hazard fires from the southwest and west. As stated in Response L-5c, the FPP addressed this matter by developing scenarios with both worst-case weather conditions (Santa Ana winds) and normal prevailing wind conditions (normal southwest to west winds along with up and down canyon winds). These scenarios provide fire planners anticipated fire behavior and fire parameters (rate of spread, fire intensity, and flame

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- L-13 cont. lengths) expected in the event of a wildfire in this specific area. This also provides Incident Command responding to a wildfire in the area with calculated potential fire behavior and fire behavior parameters for fire suppression planning strategies and tactical decisions.
- L-14 The commenter requests that the fuel model assumption in the FPP be revised to remove the consideration of irrigated agricultural groves. Section 3.1 of the FPP was revised to clarify this comment with minor revisions to fire behavior modeling.
- L-15 The Energy Release Component (ERC) provides a relative index of the amount of heat (in BTUs) per unit area (sq. ft.) within the flaming front at the head of a fire, and is very sensitive to fuel model characteristics (e.g., fuel loading, compaction, particle size, heat of combustion and mineral content). Burning Index relates the potential amount of effort needed to contain a single fire in a particular fuel type. Burning Index and ERCs are fuel model dependent. Burning indices and ERCs are used by local fire departments for determining the potential worst-case burning conditions for the current day, while forecasted indices show predicted worst-case burning conditions for the following day. These are used for recommended restrictions and red flag days.
- The FPP used computer models to calculate fire behavior parameters (e.g., rate of spread, fireline intensity, and flame length, using fuel model characteristics and local weather data). These calculated fire parameters were key for fuel modification and enhanced mitigation requirements for the Project.
- L-16 The commenter requests that there be provisions for the evacuation of small/large animals. See Response I-62.
- L-17 See Topical Response: Fire/Evacuations. It is important to remember that all routes identified for evacuation and alternate traffic control are subject to actual live conditions during a wildfire in the area and are subject to override and on-the-ground assessments of the conditions and safety measures at the time of an emergency.

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- L-18 Consider the cumulative effects of increased fire ignition risk and on evacuation of this development, plus the 742 units at HG Village, plus other future development.
- Other comments:
- L-19 Sprinklered homes only address spots that can be wetted. They do not address key fire issues for the community, only the house with the sprinklers. They do not address evacuation and burning vegetation, or smoke concentration in the valley.
 - L-20 The 150 ft of fuel modification should not be waived. An assumption of irrigated crops or landscapes should not be accepted when on adjacent and contiguous lands not controlled by the development. The Valiano project proposes encroachment into neighboring lands for fuel modification.
 - L-21 The staffing of fire department, such as teaming with Rancho Santa Fe and mutual aid from Escondido fire departments, is again designed for structural fire protection such as for individual homes, and is not a community- or whole valley-level fire strategy for fires at the scale of the Cocos fire.
 - L-22 The need for fire-barrier walls, impacts to vegetation and wildlife, wide roads are all out of character for current local residents of a rural community.
 - L-23 No assumption of irrigation should play into the fire behavior models or in any of the fire planning.
 - L-24 No California sagebrush, buckwheat, or black sage is permitted in fuel treatment zones. These are species the federally threatened California gnatcatcher depends on, so may need to consultation may be needed with USFWS on habitat loss. Fuel treatment should be limited to fall/winter due to breeding season restriction under the Migratory Bird Treaty Act.
 - L-25 Distances to fire station not realistic as to drive time.
 - L-26 Steep slopes will carry a fire rapidly uphill if started in EF/HG. This is liability to neighboring communities of a fire start within this development.
 - L-27 The report makes RPO findings for RPO wetland impacts. The second bullet on Page 30 doesn't make sense. Perhaps it says southeast corner of Neighborhood 2 by mistake, and should say northeast corner instead, but I am concerned that the finding was made to fit the project, rather than the project designed to meet the finding. The words "circulation element" which usually is a General Plan term to identify roads important to County infrastructure, is used in the justification. It may be used here to described project circulation and maybe the lack of capitalization is the way they are not claiming it as a General Plan mandated road.
 - L-28 The project impacts the drainages and wetland areas with multiple road crossings to make the project work and get access to all flat areas. This may impact local corridors for wildlife.
 - L-29 Habitat fragmentation, created by the multiple road crossing of drainages and riparian areas is not addressed.
 - L-30 While the project IDs a cumulative impact to raptor foraging and grasshopper sparrow the project mitigates for project impacts alone which doesn't offset cumulative impacts. Typically mitigation in excess of project mitigation is required to offset cumulative effects.
 - L-31 There is consideration of oak woodland buffers but they are not explicitly illustrated so one has to take it on faith the analysis is correct despite there being many places in Figure 11a and 11b where development is close to oak trees.

- L-18 The commenter requests that cumulative effects related to increased fire ignition risk and evacuation be considered. See Responses I-47 and I-59.
- L-19 All new construction of dwellings shall be sprinklered by code. See Topical Response: Fire/Evacuations regarding evacuation; see Response L-8 regarding the burning vegetation. Smoke concentrations from a wildfire would be communicated to the community through local media and other communication tools, such as reverse 911.
- L-20 The FPP evaluated the level of fire hazard that would affect or be caused by the proposed Project, and includes proposed mitigation to eliminate or minimize that hazard, including enhanced mitigation requirements. The Project would not require acquisition of a recorded easement from adjacent properties to meet fuel modification requirements. As such, all landscaping and/or irrigated crops assumed under the fire modeling would be under the control of the Valiano HOA.
- L-21 The commenter requests that the staffing of fire personnel should be at the community level and not at the project level. See Responses K-184 and K-199.
- L-22 There would be limited use of fire deflector walls; see Response I-59 regarding fire safety. Also see Response K-107 for community character.
- L-23 The commenter requests that assumptions of irrigation should not be included in the fire behavior modeling. See Responses K-201 and L-14.
- L-24 Fire code requires that highly flammable/undesirable vegetation shall be removed from the entire Project site (see Appendix B of the FPP). This is especially true with sagebrush, buckwheat and black sage.
In addition, coordination with the USFWS and CDFW on impacts to Diegan coastal sage scrub has occurred and the Project is proposing mitigation commensurate with County and Resource Agency requirements. Implementation of brush management within the fuel modification zones would be contracted out by the HOA. Project implementation would remove all sage scrub habitat occurring within the development area, including the fuel modification zones, totaling 0.2 acre of sage scrub. Coastal sage scrub would not be planted within the fuel modification zones or otherwise subject to fuel modification.
- L-25 The commenter states that distances to fire stations are not realistic to drive times. See Response I-55.
- L-26 The FPP includes restrictions on specific building materials and methods suitable for building in high fire hazard severity zones as identified by CAL FIRE (even though the Project is located in a Moderate fire hazard zone within the San Marcos Fire Protection Zone Map) and identifies

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- L-26 cont. a series of other items such as minimum water supplies, automatic fire extinguishing systems (interior sprinklers for all homes and enhances extinguishing systems/sprinklers for identified structures along the Project perimeter) and roadway widths. Overall, the development includes a layering of fire protection features that have been proven to increase ignition resistance of structures and landscapes and result in communities that are less vulnerable to wildfire.
- L-27 The site plan has been redesigned to remove the road crossing in this location.
- L-28 See Response K-32 regarding wildlife movement. The Project avoids the majority of wetland habitat on site. Regarding road crossing and wildlife movement, roads within the Project site have posted speed limits of 25 mph and this low speed limit would lessen the likelihood of wildlife being hit. Most sensitive species document on site are birds, which are less likely to be hit by vehicles. In addition, the southernmost entrance road into Neighborhood 5 would include a con-span bridge that would allow for local movement of aquatic and terrestrial species between the on-site and off-site open space.
- L-29 Biological open space on site is for avoidance, not mitigation, and as such is not required to be connected. The preservation area on site is impact neutral. The habitat would not be fragmented as detailed in Response K-32. In addition, a road and several lots have been eliminated from the riparian area. See Response K-45 for details.
- L-30 Mitigation is proposed in accordance with County guidelines. The mitigation ratios established by the County guidelines are intended to mitigate for direct and cumulative impacts.
- L-31 The analysis was conducted pursuant to County guidelines, and a corresponding figure added to the Final EIR (Figure 2.4-5c).

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L-32 • Wetland mitigation is expected at the San Luis Rey Mitigation Bank in Oceanside. While the bank may have a service area that extends to this project, it is not in the same watershed, and not within the unincorporated area. The County and other agencies may object to that location.

Summary:

L-33 • The fire mitigation proposed is completely about protection of structures of the new development, and of improving structural response time to five minutes by using a fire station in the HG Village for the new development. The FPP is a very site-specific plan. It does not address the increased danger to the surrounding community of fire ignitions due to the new numbers and density of people, only to the development itself. An area fire plan and community safety zone should be planned.

L-34 • Since the project would increase the risk of fire for the whole Elfin Forest/Harmony Grove community, as well set up a fire and smoke trap for residents due to impossible evacuation conditions, the project proponent should be required to employ more useful models for planning the fire protection of the whole valley rather than the new development alone. Such community protection is more strategic, and more likely to protect lives, animals, and property. It might use moderate -- high scenarios based on the where unirrigated vegetation currently exists (including the now-dry groves).

L-35 • The very real repeat of a fire like the 2014 Cocos fire should be analyzed for evacuation of people and animals.

L-36 • Part of the value to the rural community is the adjacency of native vegetation and wildlife; the need for fuel treatment and evacuation/shelter planning should be at a more consequential scale: that of the entire valley, rather than individual homes of the new development.

L-37 • Should add community-level fire predictive service for hazardous fire conditions such as Red Flag days when almost any ignition will start a spreading fire, and restrict certain activities during this time.

L-38 • Fire planners should be required to address problem fire scenarios for Elfin Forest/Harmony Grove as a whole, because the Valiano project in and of itself increases the risk of harm from fire for the entire valley.

L-39a • There is inadequate traffic planning, especially considering the scale of evacuation and sheltering required, as demonstrated by recent experience in the Cocos fire, during which **51,000 were called to evacuate** within about 24 hours of the fire start. The first evacuations were called for in about an hour from fire start. The cumulative impacts on fire safety and evacuation should be analyzed of the HGV development, the possible Citracado extension, with the most likely fire scenario coming from the south and west (if from the north/northeast, would most likely be embers with random start points). Consideration should be given that evacuation would be forced to Highway 78 via Country Club Road.

L-40 • There is inadequate consideration of the need to get large animals evacuated. Over 50% of existing 80 residences have horses and large animals which require tow vehicle/trailer combinations that can quickly clog escape routes and create dangerous congestion and route blockage.

If you have any questions, please contact me at liz@tierradata.com or 760-749-2247.

L-32 Comment noted. The mitigation measures state that mitigation for impacts to these areas would occur at the San Luis Rey Mitigation Bank or other location deemed acceptable by the County and Regulatory Agencies.

L-33 The commenter states that a regional fire plan and community safety zone should be planned. Also see Responses I-55, I-59, K-184 and K-199.

L-34 The commenter is concerned with fire safety for the community at large and requests a regional analysis. See Responses I-59 and L-8.

L-35 The commenter requests that the FPP analyze the 2014 Cocos fire for evacuation of people and animals. See Topical Response: Fire/Evacuations and Response K-59.

L-36 The commenter requests that the FPP be prepared at a regional level. See Response I-59 and L-8.

L-37 The responsibility of predictive services are provided by SMFD and other County emergency services (e.g., the AlertSanDiego organization). Also see Response L-15.

L-38 The commenter requests that the FPP be prepared at a regional level. See Response I-59 and L-8.

L-39a The commenter is concerned with traffic planning as it relates to evacuation. See Topical Response: Fire/Evacuations.

L-39b The commenter requests that the cumulative analysis consider the HGV development, and the possible Citracado extension. See Topical Response: Fire/Evacuations.

L-39c The commenter requests that consideration be given that evacuation would be forced to State Route 78 via Country Club Drive. See Topical Response: Fire/Evacuations.

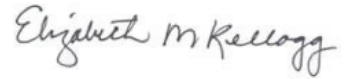
L-40 The commenter is concerned with the evacuation of large animals. See Response I-62.

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Sincerely,



Elizabeth M. Kellogg
President