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December 21, 2017

VIA EMAIL AND FEDERAL EXPRESS

Ashley Smith
Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Report from Reax Engineering re Fire Modeling of Newland Sierra Impacts to Surrounding Area During Santa Ana Wind Events (Log No. PDS2015-ER-15-08-001; SCH No. 2015021036, Project Numbers: PDS2015-GPA-15-001, PDS2015-SP-15-001, PDS2015-REZ-15-001, PDS2015-TM-5597, PDSXXXX-HLP-XXX)

Dear Ms. Smith:

As you know, we represent Golden Door Properties, LLC ("Golden Door") in opposing the proposed Newland Sierra Project ("Project"). This letter transmits a report prepared by Reax Engineering that is included as **Attachment A**. The Reax report analyzes the fire risk from the proposed Project to the Golden Door and other surrounding properties. It provides a fire modeling analysis that takes into account Santa Ana wind conditions—conditions that were not analyzed in the County's draft environmental impact report's ("DEIR") for the Project.

County staff did not make it clear that Newland DEIR's wildfire analysis did not consider potential Santa Ana winds when the DEIR was released to the public. Recent events have caused the Golden Door to reassess existing and potential dangers from wildfire for the Golden Door property. During the Lilac Fire, the Golden Door chose to evacuate all of its guests due to the fire's uncertain path. The Golden Door is continuing to update its planning for potential risks due to the spread of fire.

The recent Lilac Fire and several other major fires that burned hundreds of thousands of acres across the State occurred during Santa Ana winds and demonstrate how quickly fire can spread under such conditions, especially in sparsely developed rural areas. As you know, the Newland Project is proposed almost entirely in a Very High Fire Hazard Severity Zone. It is now clear that the DEIR did not analyze the potential for the spread of wildfire that might occur under similar conditions to the Lilac Fire, with potential Santa Ana wind gusts. The DEIR's failure to include an analysis of fire risks during Santa Ana winds is a fatal omission under the California Environmental Quality Act ("CEQA"), and the County should recirculate the DEIR to analyze this important public safety issue.

In the absence of any information or wildfire modeling that could be performed by County staff or consultants in the DEIR, the Golden Door was forced to retain an expert to

prepare an overview report, which is Attachment A. The Golden Door's August 14, 2017 comment letter discussed flaws in the DEIR's fire modeling methodology, and this report provides further information with respect to this issue that the Golden Door has already raised. County staff should review and consider additional evidence regarding the fire risk associated with the proposed Project, including the recent article published in the Voice of San Diego discussing development proposals in the County's high fire risk areas. (See **Attachment B**.) We have also attached a stand-alone .pdf document of a map that was included as part of the article depicting the location of proposed development projects in relation to the recent Lilac Fire and previously mapped high fire risk areas. (See **Attachment C**.) The County Planning staff may also wish to retain their own independent wildfire modeling consultant to perform an independent analysis of the cumulative wildfire risk associated with pending projects. In doing so, we would recommend that the staff retain a consultant who will include the potential for Santa Ana winds in the analysis.

The recent fires are a tragic reminder of the risks associated with locating new unplanned development in fire-prone rural areas. As a local business and member of the Twin Oaks Valley community, the Golden Door is concerned about risks to its property and that of its neighbors that would be caused by the Newland Sierra project. Although the formal comment period for the Project's DEIR closed prior to this new information, we ask that you provide responses to this letter and its attachments, recirculate the DEIR, and include this letter and attachments (as well as the County's response) in the County's administrative record to ensure the Planning Commission, Board of Supervisors, and general public are informed about the significant fire risks posed by the Project. In light of recent events highlighting the importance of protecting people and property from wildfires in the backcountry and given that the DEIR for Newland Sierra omits analysis of fire during Santa Ana wind conditions, full consideration of this material and the County's response to it is warranted. It is important for all concerned that these issues be publicly raised and discussed now, rather than waiting until hearings before the County Planning Commission or the County Board of Supervisors.

We thank you for your time and attention to this matter. Please do not hesitate to contact us should you have any questions or comments.

Sincerely,

Andrew D. Yancey

Andrew D. Yancey
of LATHAM & WATKINS LLP

Enclosures
cc: Kathy Van Ness, Golden Door
Mark Slovick, County Planning and Development Services
William W. Witt, Office of County Counsel
Claudia Silva, Office of County Counsel

San Diego County Planning Commissioners
Dan Silver, Endangered Habitats League
Stephanie Saathoff, Clay Co.
Denise Price, Clay Co.
Chris Garrett, Latham & Watkins

Attachment A

REAX ENGINEERING

1921 University Ave. ▪ Berkeley, CA 94704 ▪ Phone 510-629-4930 ▪ Fax 510-550-2639

Chris Lautenberger
lautenberger@reaxengineering.com

19 December 2017

Golden Door Properties, LLC
777 Deer Springs Road
San Marcos, CA 92069

Subject: Fire risk impacts of Proposed Newland Sierra Project on The Golden Door and Surrounding Area

At your request, dated October 14, 2017, I have reviewed the May 2017 Draft Environmental Impact Report (DEIR) and Fire Protection Plan (FPP) associated with the planned Newland Sierra development and analyzed potential fire/life safety impacts of this planned development to your property as well as the surrounding area.

Santa Ana winds

The biggest fire threat to The Golden Door associated with the Newland Sierra development involves ignition on land owned by Newland Sierra under Santa Ana winds. Santa Anas are hot and dry winds that blow through Southern California each year, usually between the months of October and April. Santa Anas occur when high pressure forms in the Great Basin (Western Utah, much of Nevada, and the Eastern border of California) with lower pressure off the coast of Southern California. This pressure gradient drives airflow toward the Pacific Ocean.

As air travels West from the Great Basin, orographic lift dries the air as it rises in elevation over mountain ranges. As air descends from high elevations in the Sierra Nevada, its temperature rises dramatically (~5 °F per 1000 ft decrease in elevation). A subsequent drop in relative humidity accompanies this rise in temperature. This drying/heating phenomenon is known as a katabatic wind. Relative humidity in Southern California during Santa Anas is often 10% or lower. Santa Ana winds typically blow from the Northeast toward the Southwest. .Sustained Santa Ana winds of 40+ mph with gusts of 60+ mph are not uncommon in Southern California.

The seasonality of Santa Anas presents a severe fire problem in Southern California which typically sees little rain between May and November. This means that October, November, and December Santa Anas occur after a 6+ month drought when herbaceous surface fuels are completely cured and live woody fuel moisture (*i.e.*, water in shrub-like vegetation) is at yearly lows. Much of the existing vegetation in Southern California is mixed chaparral which is characterized by rapid rates of fire spread and is highly conducive to spotting due to large-scale ember generation. Newland Sierra's DEIR acknowledges that chaparral is the primary type of vegetation within the project footprint. See DEIR, Appendix C, Part 2, Section 1.3.2, page 6 which states "Vegetation onsite consists of large blocks of densely vegetated, senescent southern mixed

chaparral with limited patches of Diegan coastal sage scrub, live oak woodlands, and southern willow scrub."

Given that hot dry Santa Anas occur in part of California that is vegetated by highly flammable chaparral at a time of year when fuel moisture content is at annual lows, it is not surprising that dozens of large loss fires have occurred in Southern California under Santa Ana winds. A partial list of historical damaging fires that have occurred in Southern California under Santa Ana winds is shown in Table 1.

Table 1. Partial list of fires damaging fires occurring under Santa Anas in Southern California.

Name	Date	County	Acres	Structures	Deaths
Bel Air	November 1961	Los Angeles	6,000	484	0
Laguna	September 1970	San Diego	175,000	382	8
Green Meadow	October 1993	Ventura	44,000	53	0
Laguna	October 1993	Orange	14,000	441	0
Cedar	October 2003	San Diego	273,000	2,820	15
Simi	October 2003	Ventura	108,000	37	0
Esperanza	October 2006	Riverside	41,000	34	5
Harris	October 2007	San Diego	90,000	548	8
Witch	October 2007	San Diego	198,000	1,650	2
Sayre	November 2008	Los Angeles	11,000	604	0
Poinsettia	May 2014	San Diego	600	28	1
Lilac	December 2017	San Diego	4,100	157	0
Thomas	December 2017	Ventura/SB	272,000*	1,024*	1*

** As of December 19, 2017*

Relative locations of The Golden Door and Newland Sierra

Golden Door Properties owns just over 600 acres to the South of land owned by Newland Sierra. Figure 1 shows the location of land owned by Golden Door Properties relative to the planned Newland Sierra development with an orthoimagery basemap; Figure 2 is an analogous map with a hillshade background to provide a qualitative sense of the terrain in the area. Deer Springs Road runs East/West between the Golden Door and Newland Sierra. Mesa Rock Road currently dead ends at the Southeast corner of Newland Sierra's land and, as part of the planned development, would be extended into land owned by Newland Sierra as a primary means of ingress and egress.

Recall from the preceding discussion that Santa Ana winds blow from the Northeast toward the Southwest. Inspection of Figure 1 and Figure 2 shows that fire originating on land owned by Newland Sierra during Santa Ana winds, particularly the Southeastern extent along Mesa Rock Road, would propagate directly toward The Golden Door and its neighbors to the South and West, including several hundred structures along Sarver Lane, Buena Creek Road, and Twin Oaks Valley Road. Given that most of the land owned by Newland Sierra is mixed southern chaparral that hasn't burned in at least 100 years, fire originating on Newland Sierra land under Santa Ana winds would be characterized by rapid rates of spread toward the Southwest with large scale ember production and long-range (> 1 mile) spotting cause by ember showers blown by winds out of the Northeast.

One thing that is not immediately apparent from Figure 1 or Figure 2 is the elevation difference the planed Newland Sierra development and The Golden Door and its neighbors. As shown in Figure 3, Newland Sierra is located north of the East/West ridgeline North of The Golden Door. A view from The Golden Door looking up at land owned by Newland Sierra is shown in Figure 4. The significance of this elevation difference is that the effective spotting distance from fire on Newland Sierra land to property owned by the Golden Door and its neighbors is increased, meaning that even weak to moderate Santa Anas could generate embers capable of reaching The Golden Door or its neighbors and igniting vegetation and structures there.

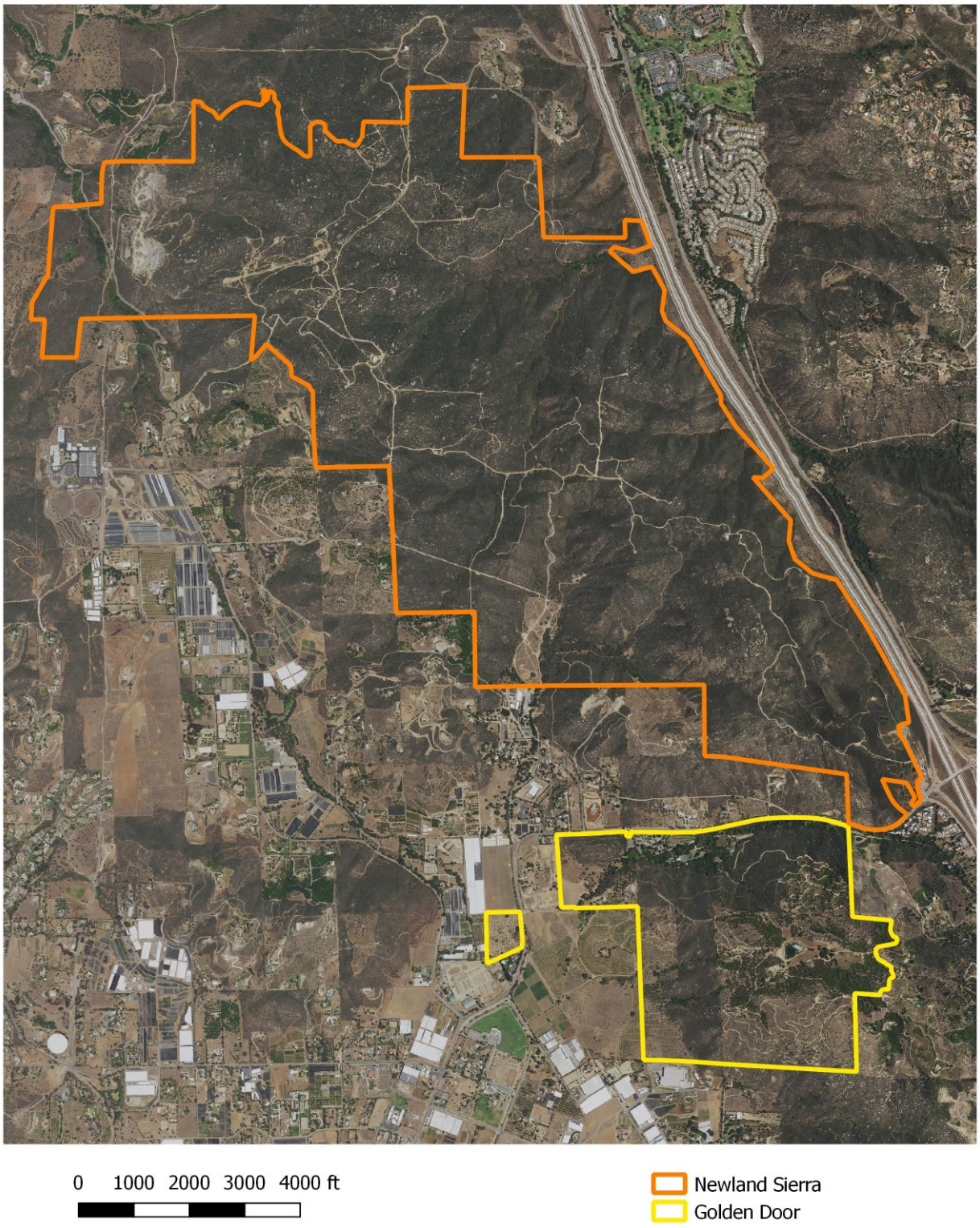


Figure 1. Location of parcels owned by Golden Door relative to parcels owned by Newland Sierra with orthoimagery background.

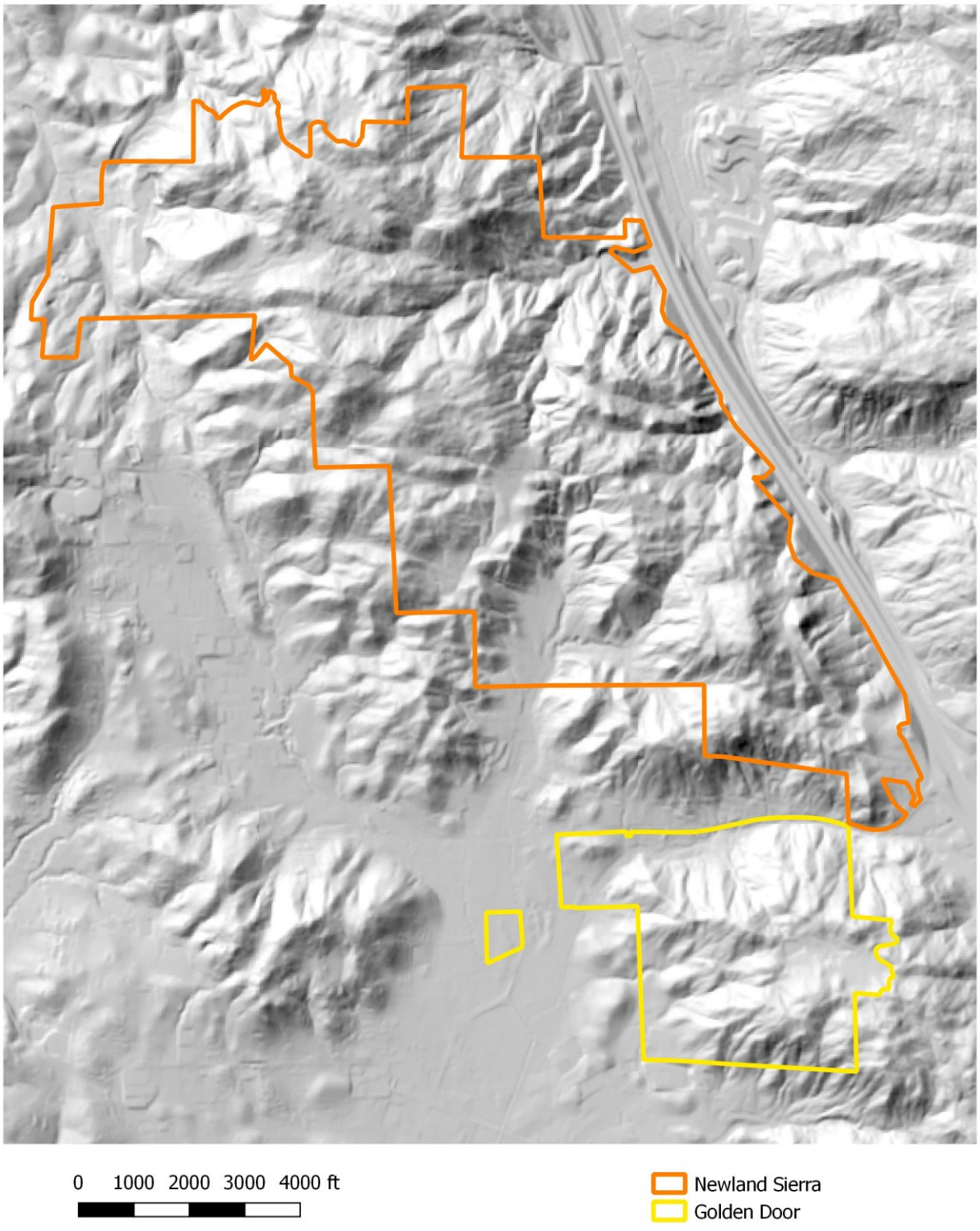


Figure 2. Location of parcels owned by Golden Door relative to parcels owned by Newland Sierra with hillshade background.

Figure 3. Photograph looking Northwest showing relative elevations of Newland Sierra and The Golden Door.

Figure 4. Photograph looking from The Golden Door toward Newland Sierra.

Fire Progression Analysis

Newland Sierra's Fire Protection Plan includes only static (FLAMMAP) fire modeling. FLAMMAP does not actually simulate fire spread across the landscape; it only quantifies potential fire behavior under constant environmental conditions assuming an area burns. The FLAMMAP modeling described in the FPP does not address how ignitions within Newland Sierra's footprint during Santa Anas could impact surrounding properties and neighbors including The Golden Door; rather only shows the change in potential that would be effected due to fuel treatments. However, such fuel treatments do very little to reduce potential fire consequences to The Golden Door and other neighbors.

Due to this oversight in the FPP, I conducted a transient fire progression analysis using ELMFIRE[1], a fire spread simulator that is similar to FARSITE. This fire progression analysis simulates movement of fire across the landscape and was conducted using the same basic assumptions as in Newland Sierra's Fire Protection Plan, *i.e.* 20-ft winds of 40 mph occurring concurrently with low dead and live fuel moistures. Fuel and topography inputs were taken from LANDFIRE 1.4.0 / LF 2014. Although the DEIR did not make available Geographic Information System (GIS) shapefiles showing the locations of roads and structures, a site plan from the DEIR .pdf document was orthorectified so that approximate locations of roads and structures could be determined. Fuels inputs were modified consistent with the presence of structures and fuel treatment zones as described in the FPP to facilitate modeling of post-development conditions. A point source ignition was placed in the Southeast part of the Newland Sierra's property in an area near the planned extension of Mesa Rock Road to simulate an anthropogenic ignition in that area. This is not the only location within the project footprint that ignition could occur, and resultant fire spread and potential impacts to other properties are dependent on the ignition location.

Three hours of simulated fire progression are shown in Figure 5 at half hour intervals. The vantage point is a birdseye isometric view looking over Highway 15 to the West down Deer Springs Road. Newland Sierra's property is shown as an orange outline (right hand side), and The Golden Door's property is shown as a yellow outline (left hand side). The fire perimeter is overlaid as red semi-transparent polygons.

Figure 5 shows that for this particular scenario, fire would reach Deer Springs Road and The Golden Door approximately 30 minutes after ignition. For ignition occurring at a different location, fire would enter other properties in a similar timeframe. Once this occurs, significant impacts to improved property, including structure loss, are likely to occur. Although this analysis does not include the effect of manual suppression on fire propagation, this is by design: fires burning through chaparral under moderate to strong Santa Anas are not amenable to direct attack and will burn until all available fuel is consumed or the winds stop.

[1] Lautenberger, C., "Wildland Fire Modeling with an Eulerian Level Set Method and Automated Calibration," *Fire Safety Journal* **62**: 289-298 (2013).

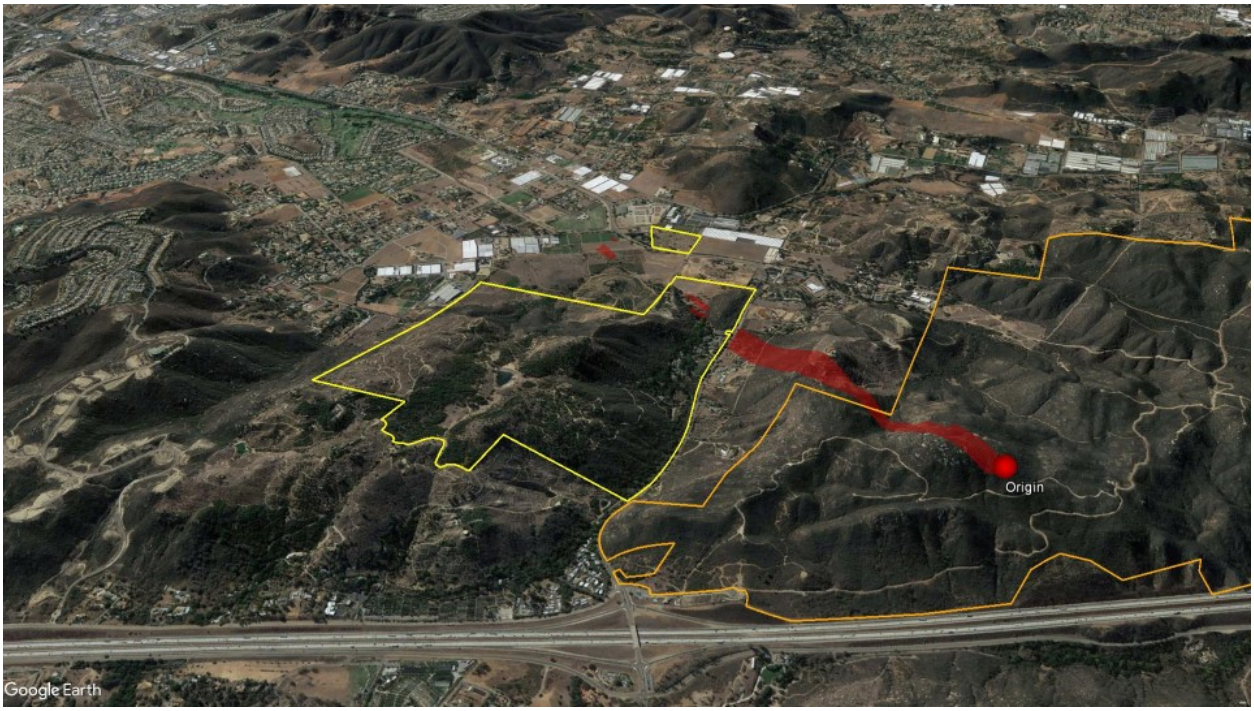


Figure 5a. Modeled fire progression ½ hour after ignition under Santa Ana conditions.

Figure 5b. Modeled fire progression 1 hour after ignition under Santa Ana conditions.

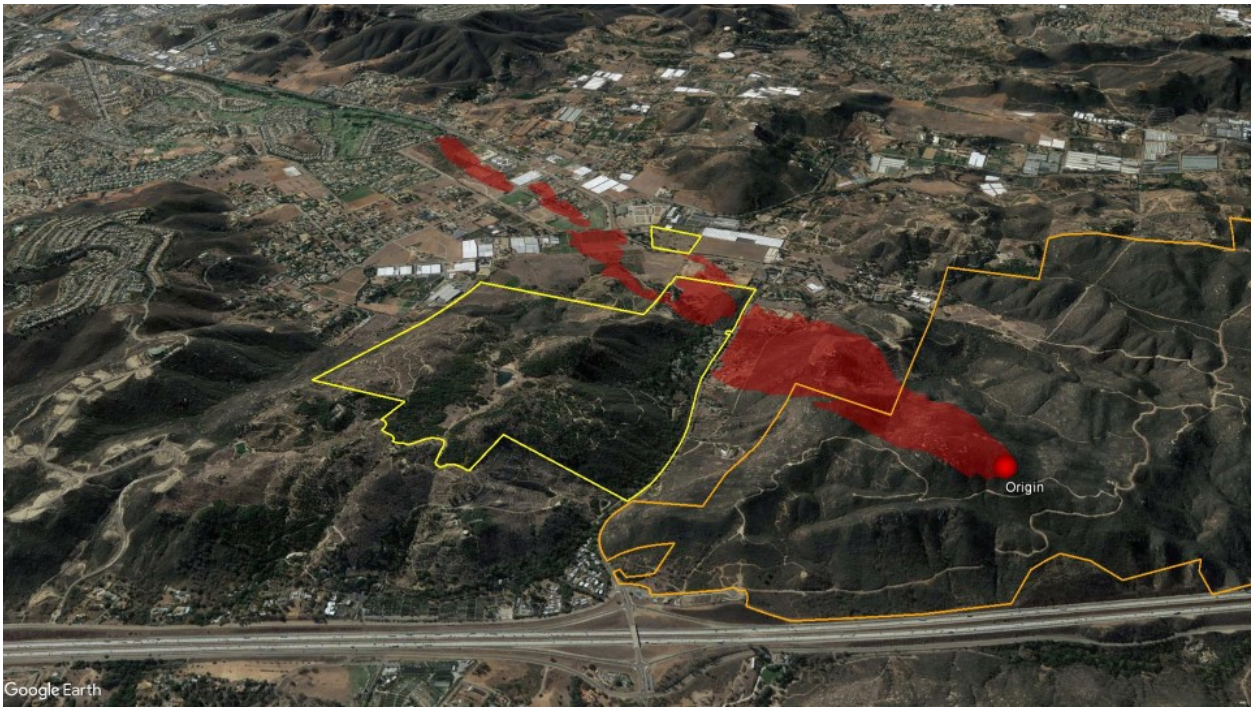


Figure 5c. Modeled fire progression 1-½ hours after ignition under Santa Ana conditions.

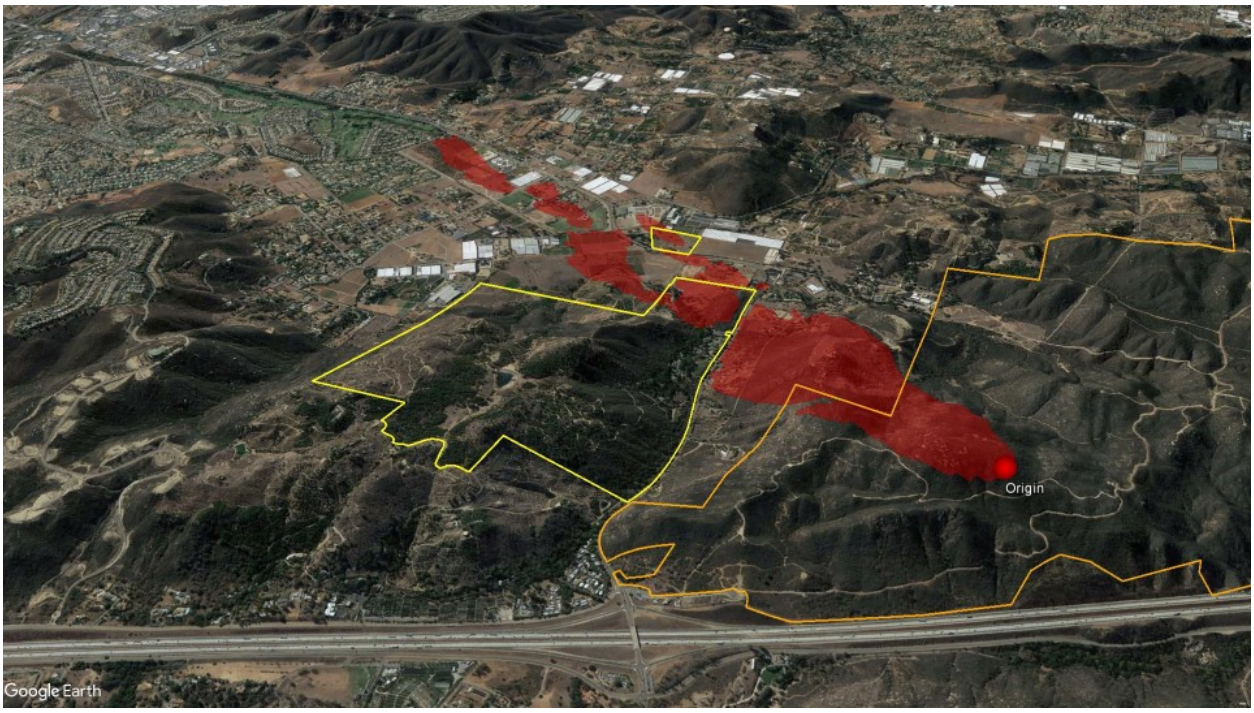


Figure 5d. Modeled fire progression 2 hours after ignition under Santa Ana conditions.

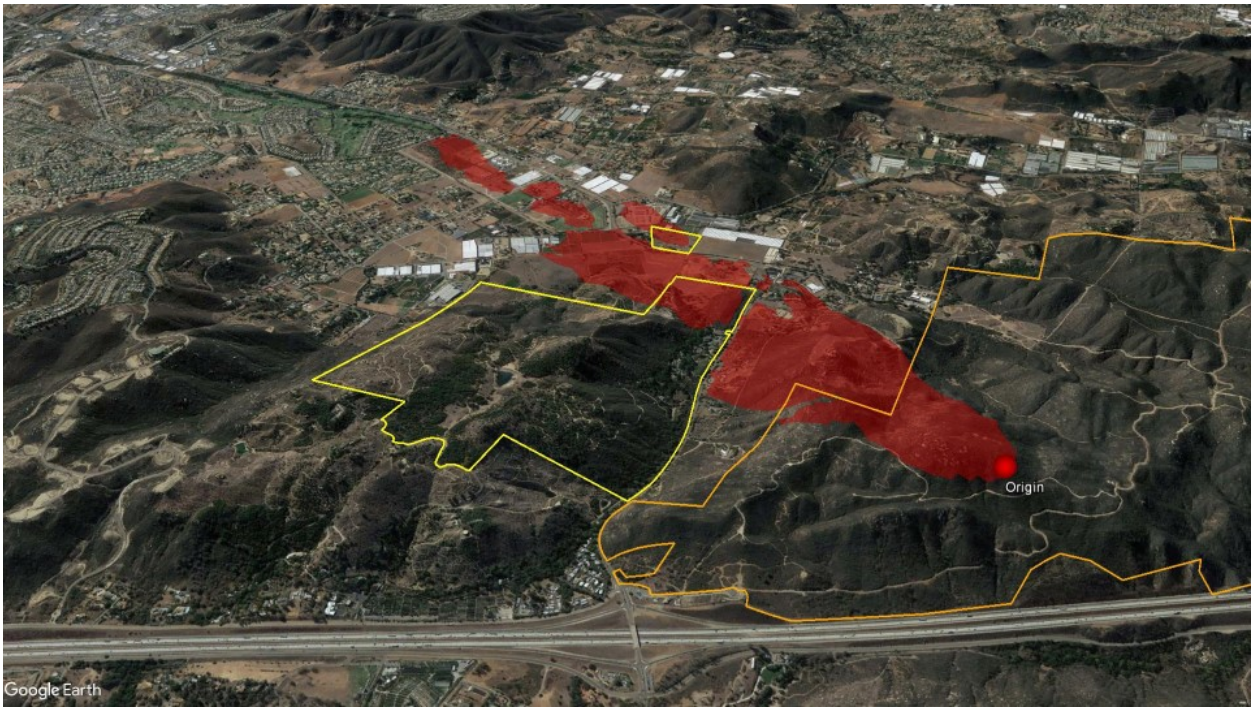


Figure 5e. Modeled fire progression 2-½ hours after ignition under Santa Ana conditions.

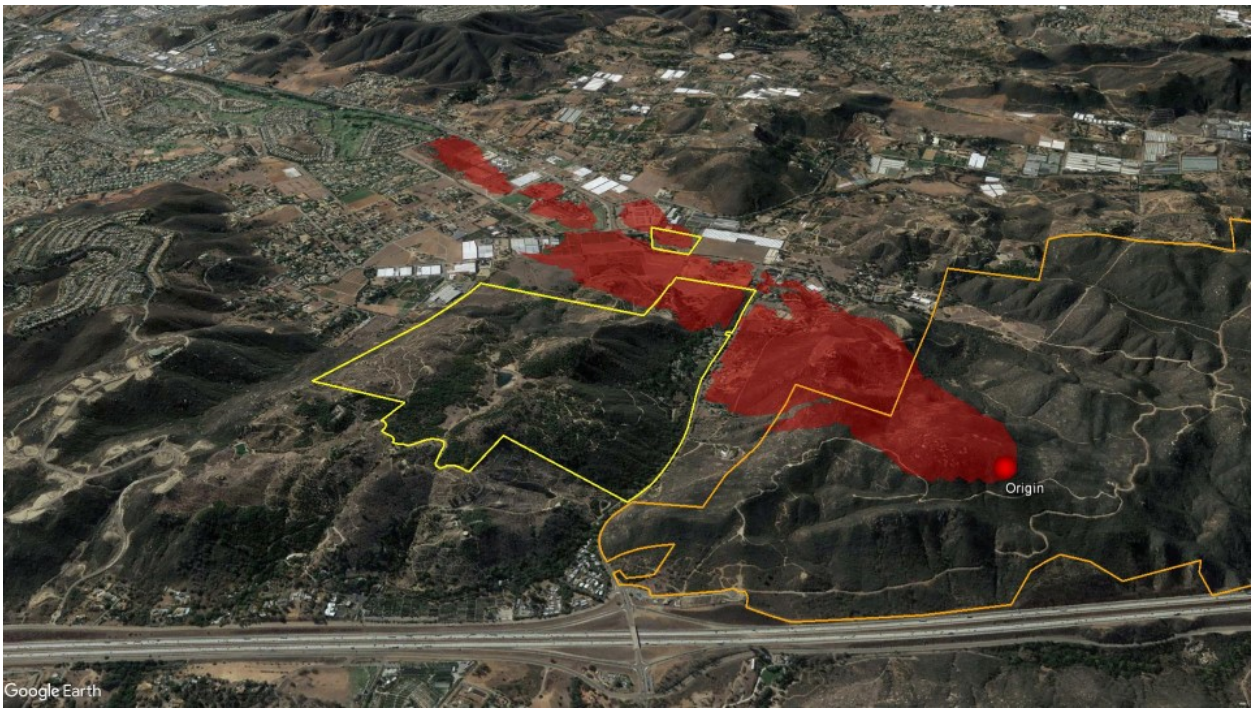


Figure 5f. Modeled fire progression 3 hours after ignition under Santa Ana conditions.

Based on this analysis, under moderate to strong Santa Ana winds:

- A fire that escapes initial containment efforts along Mesa Rock Road in the Southeast part of the planned Newland Sierra development will inevitably impact the Golden Door. Similarly, a fire igniting at other locations within Newland Sierra's footprint would be likely to impact other properties in the area.

- Such a fire traveling onto The Golden Door's property or its neighbors from Newland Sierra is likely to cause significant damage to existing vegetation and damage or destroy multiple structures.

- Such a fire is likely to reach The Golden Door within ½ hour after ignition. Entrapment will occur if emergency evacuation is not completed before the primary means of egress – a single road that exits through a gate onto Deer Springs Road – is blocked by fire and/or traffic congestion. A similar scenario may develop at neighboring properties, and it is conceivable that some residents may have less than ½ hour to evacuate.

- The highest risk of entrapment is associated with an overnight ignition under Santa Ana Conditions. Such a scenario would require Golden Door Staff to awaken as many as 42 guests, most of whom would be unfamiliar with their surroundings. Some may have mobility difficulties. Guests and staff (up to 140 workers may be on site at any given point in time) would evacuate in darkness, under high winds, with smoke in the air, in a wind-driven ember shower with multiple spot fires igniting. If entrapment occurs, burnover with multiple fatalities is likely.

- While this analysis was focused on the Golden Door, similar situations could develop at neighboring properties.

It is also important to point out that The Golden Door is not the only property that could be impacted by fire originating on Newland Sierra's land during Santa Ana conditions. Spotting distances for fire burning through chaparral under Santa Anas are on the order of 2-3 miles. Therefore, any properties within a 2-3 mile buffer of the planned Newland Sierra development could also be impacted by embers originating from fire burning there. Figure 6 shows a 2.5 mile buffer from Newland Sierra in the Southwest direction (because under Santa Ana winds this is the direction toward which the wind blows).

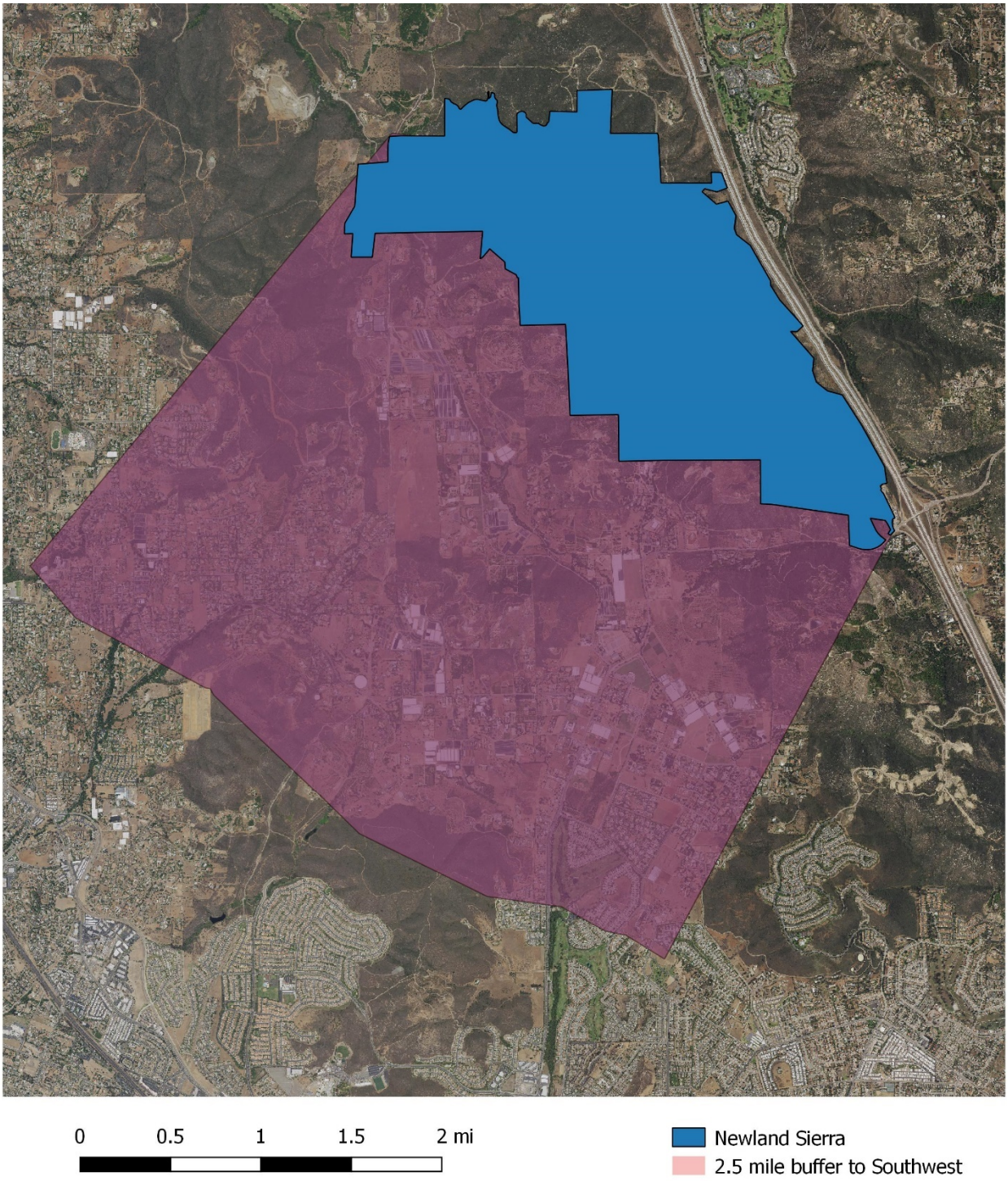


Figure 6. 2.5 mile to Southwest of Newland Sierra land.

It is notable that the 7 December 2017 Lilac Fire ignited approximately 5 miles north of the Newland Sierra project site and burned toward the Southwest under Santa Ana winds, ultimately destroying 157 structures. The Lilac Fire perimeter relative to Newland Sierra and The Golden Door is shown in Figure 7.

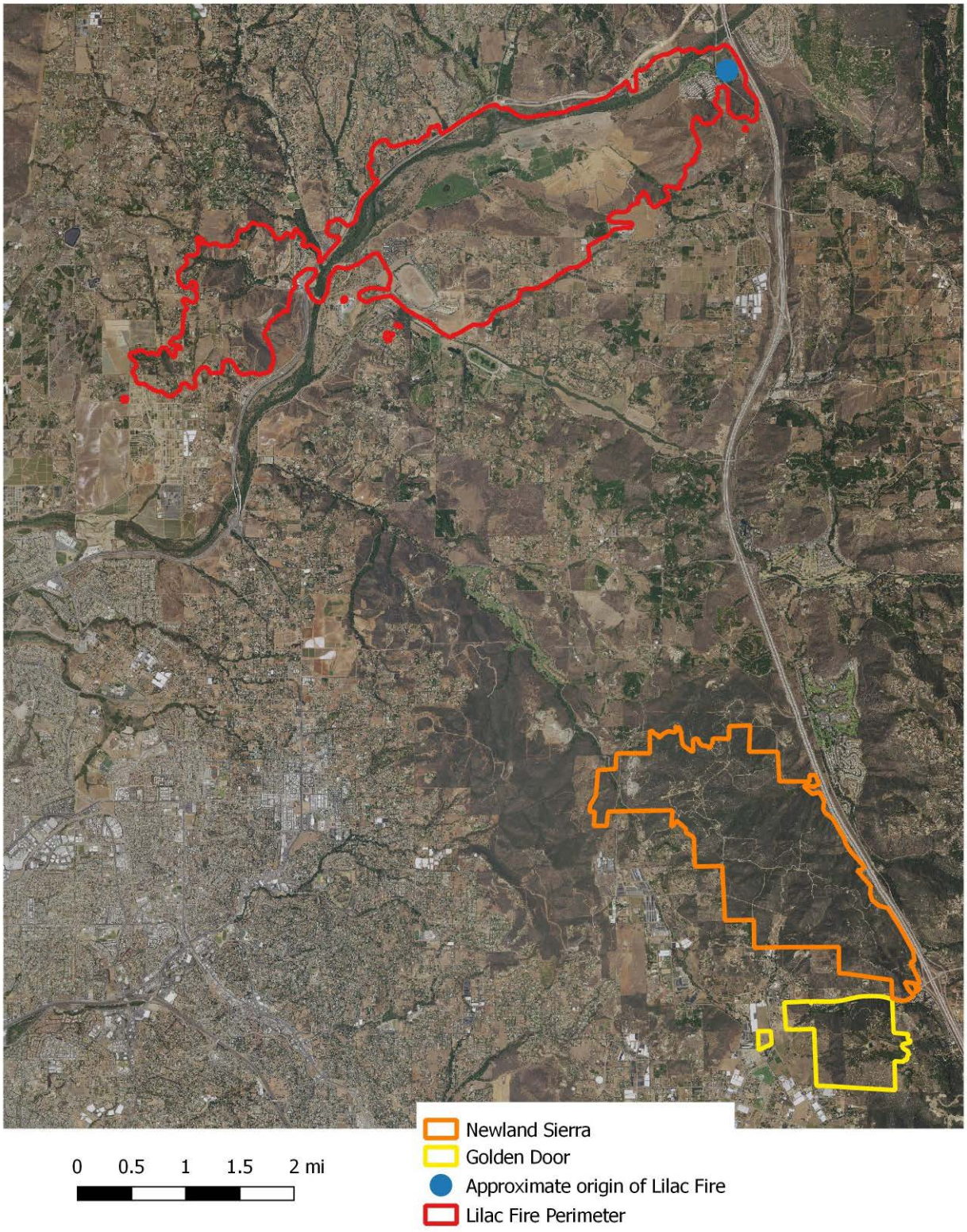


Figure 7. Location of Lilac Fire relative to Newland Sierra and The Golden Door.

Increase in ignition probability associated with Newland Sierra development

The majority of wildland fires are caused by humans as opposed to natural causes such as lightning. Common anthropogenic causes of fire include arson/incendiary, equipment use, debris burning, smoking, vehicles, fireworks, electricity, and outdoor cooking (barbecuing). Structure fires sometimes spread and initiate wildland fires. For these reasons, it should be apparent that the presence of development in the wildland urban interface – which adds roads, structures, vehicles, and people to previously undeveloped areas – results in increased probability of fire starts.

While this conclusion is common sense, multiple scientific studies have concluded the same. A study that analyzed 27 years of data in Canada[2] concluded "Fire ignition densities decreased exponentially as distance to road or populated place increased, and largest ignition trends occurred closest to both variables." Similarly, a 2007 study entitled "Human Influence on California Fire Regimes"[3] stated:

> We found highly significant relationships between humans and fire on the contemporary landscape, and our models explained fire frequency ($R^2 = 0.72$) better than area burned ($R^2 = 0.50$). Population density, intermix WUI, and distance to WUI explained the most variability in fire frequency, suggesting that the spatial pattern of development may be an important variable to consider when estimating fire risk.

For the above reasons, the planned Newland Sierra development greatly increases the probability of ignition occurring within its footprint, which is currently mostly undeveloped land designated for limited residential development (1 unit per 20 acres).

Summary and conclusions

- Risk is the combination (product) of probability and consequence.
- Due to increased presence of humans and vehicular traffic, the planned Newland Sierra development greatly increases the probability of fire occurring within the project footprint.
- Under Santa Ana winds, the consequences associated with a fire igniting within Newland Sierra's footprint to the Golden Door and other neighbors are severe. Potential consequences include destruction of multiple structures and loss of life. Although Newland Sierra's fire protection plan discusses fuel treatments that would be implemented, these fuel treatments do very little to reduce potential consequences to The Golden Door and other neighbors.
- Since the Newland Sierra project greatly increases the probability of fire occurrence but does essentially nothing to reduce potential consequences to The Golden Door and other neighbors, it greatly increases overall fire risk to these entities.

Sincerely,

Christopher W. Lautenberger, PhD, PE

[2] Gralewicz, N.J., Nelson, T.A., Wulder, M.A., "Spatial and temporal patterns of wildfire ignitions in Canada from 1980 to 2006," *International Journal of Wildland Fire* **21**: 230-242 (2012).

[3] Syphard, A.D., Radeloff, V.C., Keeley, J.E., Hawbaker, T.J., Clayton, M.K., Stewart, S.I., and Hammer, R.B., "Human influence on California fire regimes," *Ecological Applications* **17** 1388–1402 (2007).

Attachment B

- Voice of San Diego - https://www.voiceofsandiego.org -

County Officials Set to Consider Allowing Nearly 6,000 New Homes in High Wildfire Risk Areas

Posted By *Maya Srikrishnan* On December 12, 2017 @ 8:00 am

The site of the proposed Newland Sierra project, which would bring about 2,100 homes to an area at high risk for wildfires. / Photo by Jamie Scott Lytle

There's an invisible line where human development meets flammable vegetation, and it's where the most destruction from wildfires occurs.

It's called the wildland-urban interface. In San Diego, developers are looking to build nearly 6,000 more homes along this frontline.

“When I heard this fire started where it started, with those weather concerns, I was concerned,” North County Fire Protection District Chief Steven Abbott said at a public meeting in Fallbrook Saturday of the Lilac Fire.

The Lilac Fire destroyed more than 180 structures, roughly half of which were homes, considered in the wildland urban interface. Nearly 7,500 residents evacuated and several were injured, including firefighters.

County leaders may soon decide whether to let developers move forward with projects that would be located in areas of extreme wildfire danger, an approval the projects need because they’re proposed in areas where far fewer new homes were envisioned in the county’s long-term growth plan, approved in 2011.

In Houston, development decisions may have contributed to the devastation [1] caused by flooding from Hurricane Harvey.

In Southern California, the same may be true for wildfires.

A 2013 study [2] by the U.S. Geological Survey, for instance, found that sprawl projects built far away from existing development, often called leapfrog development, have led to more houses being lost to fire.

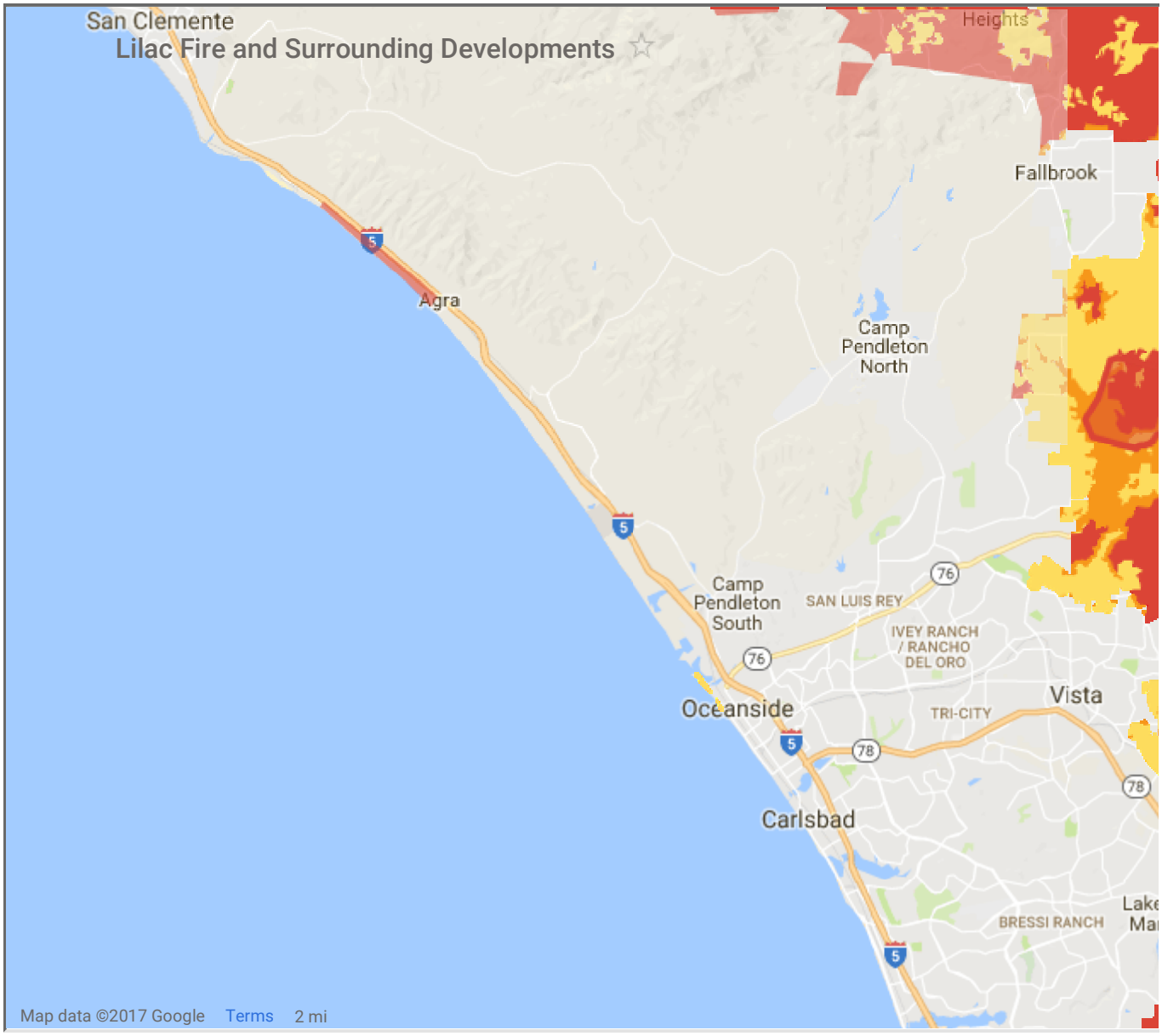
“The first set of homes are going to be in danger because they’ll be surrounded by wildland,” said Jon Keeley, one of the study’s authors. “Leapfrog, without a doubt, leads to the highest loss of homes.”

The safest way to build new housing is to build it near existing housing, the study found.

The large development projects still waiting for approval are not just located in severe wildfire risk areas [3]. Some are just on the other side of the I-15 from where the Lilac Fire burned. Some are in the same area as the 2014 Cocos Fire, which destroyed roughly 65 buildings [4], costing roughly $28.5 million to contain and incurring an estimated $29.8 million in property damage. They’re also near the 2007 Witch Fire, which amounted to roughly $1.3 billion in damages [5], and the 2003 Cedar Fire, which destroyed 2,820 buildings and killed 15 people [6].

The projects are proposed in northeastern San Diego County because it's some of the last bare land for development in the county. But that's exactly why they're concerning, experts say: The risk is highest when the first developments go in, and eventually subsides when there is a much larger mass of buildings and people like in downtown San Diego, Oceanside or Escondido.

One of the projects, Lilac Hills Ranch [7], proposes roughly 1,700 homes on 600 acres of rolling hills in Valley Center. Harmony Grove South would add 463 homes around the corner from Valiano, another proposed development including 326 homes. Another Harmony Grove project of about 700 homes is already under construction. Newland Sierra, between Vista and Valley Center, would bring another 2,135 homes. Warner Ranch, near Pala, proposes another roughly 780 homes.



Keeley said this year's fires in Napa and Sonoma counties, where more than 40 people died and hundreds of homes and buildings were destroyed, showed the dangers of new development.

"That area had fires very similar to the fires they had this year in 1964, but no one died in those fires," Keeley said. "The primary thing that has changed wasn't the fire."

The increase in deaths and destruction was more likely due to the drastic increase in people populating Santa Rosa [8], he said.

Richard Halsey, the director of the California Chaparral Institute, said from the minute you build a home in the wildland-urban interface, it becomes more and more dangerous, as

litter builds up, homes age, people accumulate stuff that could be flammable and let dried leaves or other brush build up in their gutters and yards. It's not until you reach a certain density, where most of the vegetation is removed from areas, that the danger diminishes.

Halsey said he's concerned about a project in his backyard in Escondido, Safari Highlands [9].

"That was in the fire corridor that the 2007 fire raged through," he said. "It's in an area pretty much identical to the area that burned in Santa Rosa, the neighborhoods being taken out by the Thomas Fire right now."

The large projects all require amendments to the county's growth blueprint because they would put more density than is currently allowed. The amendments must go through the county's Planning Commission and Board of Supervisors.

Newland Sierra is expected to come before the board in 2018.

Decision-makers can impose requirements on the developments that could minimize their fire risk. Valiano, for instance, would need to build new roads leading out of the property [10] to help with evacuation, according to its Fire Protection Plan, a document included in the county's development review process. Harmony Grove Village would build a new fire station if approved [11].

Developers for Lilac Hills Ranch, meanwhile, have not yet proposed how they'll ensure fire crews can reach homes in the project's furthest reaches within required fire response timelines – though early phases of the development can begin before they figure it out.

The most common needs for North County projects, according to the San Diego County Fire Authority, mostly deal with adequate roads into and out of the projects.

During the Cocos Fire, traffic gridlocked on Country Club Drive as residents tried to evacuate, according to some accounts [12]. The fire created the same problem for another nearby development, San Elijo Hills, near San Marcos. San Elijo Road led to all three exits out of the development and became gridlocked as thousands of residents fled.

Lilac Hills Ranch, which is roughly less than a mile from the Lilac Fire at the closest point of the two and roughly three to four miles from the center of the fire zone to the center of the

development, already tried to skirt development requirements related to fire and public safety.

A 2015 Voice of San Diego investigation [13] found that developers behind the project refused to pay for a new fire station for the more than 3,000 additional residents they would bring in to the area. The project would build 1,746 homes in a mostly rural area where current restrictions allow only 110 homes.

In fall 2015, the county's Planning Commission recommended the Board of Supervisors approve the project, but with several changes – including funding the construction of a new fire station [14].

But instead of agreeing to that stipulation, Lilac Hills' developers eventually opted to instead put the project before voters last November as Measure B. The initiative also specified [15] ways the project could avoid certain safety investments.

For instance, the developer had asked the county for exceptions to various road standards, so they wouldn't have to flatten hills, or widen country roads to accommodate the influx of traffic the development would bring.

In the initiative, they simply said that West Lilac Road – which was the easternmost boundary of the Lilac Fire, and one of the roads the Planning Commission said needed widening – didn't need to be changed.

The Lilac Hills ballot measure failed, but the project and others that would require amendments to the county general plan are not dead [16].

Keeley said there are known avenues to make at-risk developments safer, but politicians need to demand them.

"People already know what the best thing to do in those cases is," Keeley said. "If you ask any fire chief in the county, they'll tell you, you got to have access roads, you're going to need a way to get firefighters in the area. Fire chiefs in San Diego County know pretty clearly what makes development risky, and they do have a lot of suggestions how to make those developments succeed. If developers are trying to avoid that, that's a political question."

Halsey also said politicians should work on retrofitting existing buildings and homes to improve their fire safety – for example, by putting in automatic external sprinkler systems that could wet the entire house during wildfire risk.

"The climate is changing," Halsey said. "If we've built in wildland areas, there are things we can do to strengthen them."

URLs in this post:

[1] may have contributed to the devastation: https://www.washingtonpost.com/graphics/2017/investigations/harvey-urban-planning/?utm_term=.ea73a9c83faf
[2] 2013 study: http://www.werc.usgs.gov/ProductDetails.aspx?ID=4935
[3] located in severe wildfire risk areas: https://www.voiceofsandiego.org/topics/science-environment/developers-seek-permission-to-build-in-severe-wildfire-risk-areas/
[4] destroyed roughly 65 buildings: http://www.readysandiego.org/aar/may-2014-san-diego-county-wildfires/May-2014-San-Diego-County-Wildfires.pdf
[5] amounted to roughly $1.3 billion in damages: http://air-worldwide.com/_public/NewsData/001563/AIRCurrents_CaliWildfires.pdf
[6] destroyed 2,820 buildings and killed 15 people: https://web.archive.org/web/20160623225606/http:/www.lakesidehistory.org/CedarFire/cedar_fire_memorial.htm
[7] Lilac Hills Ranch: http://www.voiceofsandiego.org/topics/land-use/developer-wont-take-no-for-an-answer-on-massive-lilac-hills-ranch-project/
[8] drastic increase in people populating Santa Rosa: http://sonomacounty.ca.gov/CAO/Public-Reports/About-Sonoma-County/Population-Growth/
[9] Safari Highlands: https://www.escondido.org/safari-highlands-ranch-specific-plan.aspx
[10] to build new roads leading out of the property: http://www.sandiegocounty.gov/content/dam/sdc/pds/regulatory/docs/VALIANO/FDEIR/FPP-pt1.pdf
[11] would build a new fire station if approved: http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/hgvs/Harmony

%20Grove%20Village%20South%20Public%20Review/PDS2015-GPA-15-002-EIR-AppL-Fire_Protection_Plan.pdf

[12] according to some accounts: http://www.sandiegocounty.gov/content/dam/sdc/pds/regulatory/docs/VALIANO/FDEIR/publiccomments/Valiano%20Individual%20Comments%20L%20through%20O%20rev.pdf

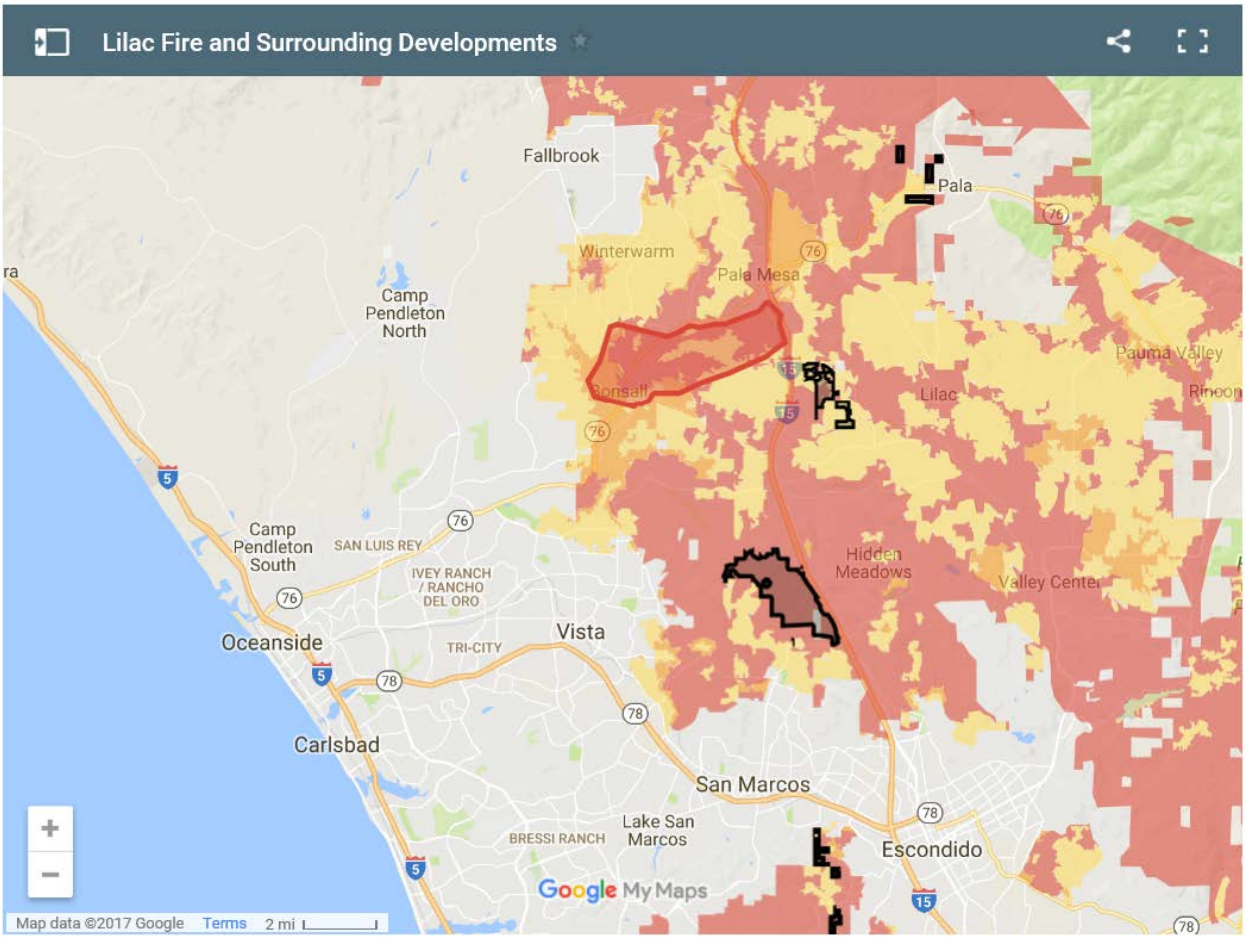
[13] Voice of San Diego investigation: https://www.voiceofsandiego.org/corrections/developer-wont-take-no-for-an-answer-on-massive-lilac-hills-ranch-project/

[14] of a new fire station: http://www.voiceofsandiego.org/wp-content/uploads/2016/03/Planning-Commission-ACTION-SHEET-09-11-15.pdf

[15] specified: https://www.voiceofsandiego.org/topics/land-use/lilac-hills-initiative-includes-several-get-out-of-lawsuit-free-cards-for-developer/

[16] are not dead: https://www.voiceofsandiego.org/topics/land-use/lilac-hills-ranch-is-still-alive/

Attachment C



Maya Srikrishnan, *County Officials Set to Consider Allowing Nearly 6,000 New Homes in High Wildfire Risk Areas,* Voice of San Diego (Dec. 12, 2017) <https://www.voiceofsandiego.org/topics/land-use/county-officials-set-consider-allowing-nearly-6000-new-homes-high-wildfire-risk-areas>