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20223 Elfin Forest Road
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May 9, 2018

David Pallinger
Chairperson
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Re: DRAFT Wildland Fire Evacuation Plan for the Valiano Community MARCH 2018

Dear Mr. Pallinger:

The DRAFT Wildland Fire Evacuation Plan for the Valiano Community MARCH 2018 (“EP”) is deeply flawed for a variety of reasons. The most serious is that an adverse environmental effect that would certainly result in a significant impact to wildland fire hazard and threat to public safety is identified, and the recommended measure to mitigate the impact is fatally flawed. The flaw occurred because the evaluation omitted from consideration a typical adverse effect specified in the Guidelines for Determination of Significance.

The wildland fire hazard acknowledged in the EP is as follows (page 28):

*Wildfires originating closer to the community could allow **significantly less time for evacuation than would be required** and could make one or more evacuation route not usable.*

The adverse environmental effect caused by the Valiano project that could potentially cause a significant impact to existing residents is described as follows (page 28):

*The **Valiano project could add up to 612 vehicles** to some evacuation scenarios. This could affect evacuation times, **resulting in longer timeframes for residents using Country Club Drive and the other roads along identified evacuation routes.***

The recommended mitigation measure (page 28):

*Valiano offers decision makers with contingency options, including **evacuating or relocating a portion of the community** (much lower number of vehicles and faster evacuation time, proportional to the vehicle total being relocated), or not evacuating any of the residents if it is safer to **shelter on site**.*

And the mitigation measure is further explained (page 28):

*When a fire ignites in the area, and there are multiple hours available for evacuation, then it is likely that **incident managers** will evacuate Harmony Grove residents, including Valiano. However, if there are not multiple hours available, then certain communities within Harmony Grove, those that are built and maintained to highly ignition resistant standards, may not be evacuated.*

And the conclusion:

*This available option **mitigates potential impacts on existing resident evacuations**.*

The “**shelter on site**” mitigation measure is fatally flawed because it is utterly dependent on enforcement of the shelter-in-place decisions of “incident managers”. In fact, incident managers *cannot* enforce shelter-in-place because **the public are the final decision makers**, not law enforcement or fire personnel. People can leave if they want to. There can be no certainty that shelter-in-place decision by incident managers will be followed by the public. In reality, the most probable outcome is that **many if not most of them will decide to leave**. For this reason, shelter-in-place is a fatally flawed mitigation measure that cannot be relied upon. Therefore, the measure does not adequately mitigate the potential impact of the Valiano project on existing resident evacuation.

In addition, there are no communities built to shelter-in-place standards in Harmony Grove to evacuate to. The current existing homes are older and do not meet any of the required standards, and even Harmony Grove Village and the proposed HGVS have been characterized by Rancho Sante Fe Fire District as NOT shelter in place – see letter from Chief Michell attached.

The mitigation value of shelter-in-place has been mis-characterized in the EP because an adverse effect specified in the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Wildland Fire and Fire Protection, Second Revision, August 31, 2010* (“Guidelines”) was omitted as a factor in the EP evaluation. At 3.0 TYPICAL ADVERSE EFFECTS (page 7) the Guidelines state:

Since the level and type of risk can vary from project to project, prioritizing the project deficiencies (or combination of deficiencies) that create the biggest risk is difficult. In general, however, the following circumstances can result in increased fire related risks to people and structures (not listed in any particular order)

Of the eight typical adverse effects specified for consideration in evaluating the level and type of risk of a project, the adverse effect as issue is the following:

Responses of people during a wildland fire (human behavior)

Responses of people during a wildland fire is absolutely central to evaluation of the risk caused by the Valiano project to existing residents evacuation, and the effect was not considered at all in the EP. If it were, it is highly likely the shelter-in-place mitigation measure for the acknowledged potentially significant impacts on existing resident evacuations would have been discredited -- because people have the freedom to decide to leave if they choose to, and many, if not most, probably would. There can be no certainty that they would not; and law enforcement would be powerless to compel them to stay.

We call on the Planning Commission to consider the following:

1. Given that a new potentially significant impact was acknowledged in the EP and was not identified in the FEIR; and given that the new mitigation recommended in the EP for that impact is inadequate, as described above, please consider directing PDS to reevaluate the level of the impact and the value of shelter-in-place as mitigation and recirculate the Hazard and Hazardous Materials section of the EIR for comment on this new significant information.
2. The evacuation modeling did not take into account the traffic generated by evacuating current residents: the study should be redone to include all the residents who would be required to evacuate in order to measure the true impact on road capacity. The evacuation study needs to be redone to include all residents, including the fact there are more horses than people to evacuate.
3. Consider alternate mitigations for the acknowledged impact. Improvements to ingress/egress would most certainly provide effective mitigation to the impact. We respectfully request that you mandate, as a condition of approval, extension of a roadway from the development site to La Moree. Such a road would be one of most effective of possible measures with great value for the safety of the entire community.
4. Also, please consider reducing the density of the project. Reduced density would limit the impact on existing resident evacuation while maintaining the refuge value of the ignition project design features.
5. Include as a condition of approval a true secondary exit via La Moree to mitigate the extreme fire risk impact of this project on current residents.
6. Please consider directing PDS to fully evaluate the Valiano Vineyards alternative offered by the community to the County last March. It would preserve about 80% of the more affordable housing in the Proposed Project, while substantially reducing virtually every

impact including the impact on community evacuations. Valiano Vineyards is a balanced approach with benefits for all and we encourage you to take a serious look at it.

Safety first gentlemen. We need affordable housing but at what potential cost in lives lost?

Sincerely,

A handwritten signature in black ink, appearing to be 'Scott C Sutherland', written in a cursive style.

Scott C Sutherland, Valiano Chair