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Escondido, CA 92025

John Helmer, Planning Division
Escondido City Hall, Second Floor
201 North Broadway
Escondido, CA 92025

November 20, 2018

Dear Mr. Helmer:

We submit this letter on behalf of San Pasqual Valley Preservation Alliance (SPVPA), an Escondido-based group formed to give voice to a range of serious and wide-ranging issues impacting the San Pasqual Valley. We would like to begin by expressing our extreme gratitude to the Escondido Fire Department (EFD) and cooperating regional fire agencies for their immediate and effective response to a series of fires in the San Pasqual Valley area this past summer.

Following the Safari Highlands Ranch (SHR) Draft EIR released in October 2017, SPVPA joined with partner groups in submitting detailed responses to many aspects of the DEIR. After the Pasqual Fire, Rangeland Fire and Cloverdale Fire this past July and August, and with the devastation of the Camp Fire and Woolsey Fire fresh in our minds, SPVPA decided to revisit the Safari Highlands Ranch Wildfire Analysis and Fire Protection Plan (Chapter 2.14 and Appendices 2.14): <https://www.escondido.org/environmental-impact-report.aspx>

In addition to numerous serious fire issues presented in the Review of Safari Highlands Ranch EIR of October 2017 by Joseph Zicherman, Ph.D., SFPE (<https://www.spvpa.org/wp-content/uploads/2018/01/Zicherman-Report-and-CV-2017-12-27.pdf>), submitted to you during the public comment period, it is shocking to find that SHR's Fire Protection Plan proposes using the private Zoo Road as an evacuation route **without accounting for the evacuation of a single employee or guest of the San Diego Zoo's Safari Park**. Every day there are hundreds of employees and thousands of guests on the grounds of the San Diego Zoo's Safari Park, more during peak season, yet SHR's site-specific evacuation plan fails to account for that massive influx of evacuees onto Zoo Road and at the intersection with State Route 78. Without those hundreds and likely thousands of cars factored into the evacuation planning, it is impossible for anyone, including the Escondido Planning Commission, to make an accurate and informed decision about whether SHR's significant impacts have been sufficiently mitigated in that regard. We implore you to read not just SHR's wildfire environmental analysis, but also the associated appendix (*Dudek*. Fire Protection Plan Safari Highlands Ranch. Page 82-83, 9.4.2 Roadway Capacities and Maximum Evacuation Time Estimate): <https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/SafariRanch/eir/101317/Appendices/214FireProtectionPlan/201707FireProtectionPlan.pdf>

A similarly important issue is that major elements of SHR's Fire Protection Plan, specifically the construction of a fire station and northerly evacuation road, are not required to be in place until the 275th Certificate of Occupancy is issued ([SHR Draft EIR: Project Description](#), Page 1.0-11). Not only is that event not likely to occur for many years after the initiation of construction, but if construction stops short of the 275th homesite, temporarily or permanently, existing homes nearby as well as up to 274 SHR homes would be left with virtually no mitigation of anticipated fire hazards. In the wake of the devastating loss of life and property in the Camp Fire and Woolsey Fire, that is simply unacceptable. At a minimum, Escondido should require that the proposed fire station and northern evacuation road be completed and fully operational before any Certificate of Occupancy permits are issued. Anything short of that would be to disregard the lessons of several recent wildland-urban interface fires in San Diego County and California.

Respectfully Submitted,



NeySa L. Ely
San Pasqual Valley Preservation Alliance
Board of Directors



Scott R. Graves
San Pasqual Valley Preservation Alliance
Board of Directors

cc: Rick Vogt, Fire Chief – Escondido Fire Depart.
Jeff Murdock, Emergency/Disaster Preparedness Manager – Escondido Fire Dept.
Tony Mecham, Unit and County Fire Chief – CAL FIRE
Robert Barry, AICP, Chief Analyst – LAFCO
Eric Lardy, Acting Chief, Dept Ops – County of San Diego
Nicolas Gustafson, LUE Planner – County of San Diego
James Spann, Chairman Planning Division – City of Escondido
Jay Petrek, Assistant City Manager – City of Escondido
Mike Strong, Assistant Planning Director – City of Escondido
Olga Diaz, Council Member – City of Escondido
Sam Abed, Mayor – City of Escondido
Bill Martin, Director of Community Development – City of Escondido
Jeffrey Epp, City Manager – City of Escondido
Mark Burroughs, Superintendent/Principal – San Pasqual Union School District