FINAL ENVIRONMENTAL IMPACT REPORT
VOLUME B
RESPONSE TO COMMENTS

for the proposed

Salvation Army Divisional Camp and Retreat

SCH No. 2000031058
ER 98-14-023
P70-379W2

Prepared for:

COUNTY OF SAN DIEGO

Department of Planning and Land Use

5201 Ruffin Road, Suite B

San Diego, CA 92123

858-694-3091

Contact: Dave Sibbet

Prepared by:

BRG CONSULTING, INC.

304 Ivy Street

San Diego, CA 92101

619-298-7127

Contact: Tim Gnibus, AICP

Project Proponent:

SALVATION ARMY

Sierra del Mar Division

2320 Fifth Avenue

San Diego, CA 92101

March 19, 2010

LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE 2005 DRAFT EIR and the Recirculated Revised Draft EIR

A draft version of this EIR was originally circulated for public review from February 10, 2005 to March 28, 2005. A revised Draft EIR was circulated for public review from April 24, 2008 to June 11, 2008. The following is a listing of the names and addresses of persons, organizations, and public agencies that commented during these two public review periods.

FEDERAL AGENCIES	ADDRESS
2005 Draft EIR:	
Department of Defense Department of the Army	San Diego Field Office Los Angeles District, Corps of Engineers 16885 West Bernardo Drive, Suite 300A San Diego, CA 92127
Revised Draft EIR:	
Fish and Wildlife Service	Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, CA 92011

STATE AGENCIES	ADDRESS
2005 Draft EIR:	
Native American Heritage Commission	915 Capitol Mall, Room 364 Sacramento, CA 95814
Revised Draft EIR:	
Native American Heritage Commission	915 Capitol Mall, Room 364 Sacramento, CA 95814
Department of Fish and Game	4949 Viewridge Avenue San Diego, CA 92123

COUNTY, CITY, AND OTHER LOCAL AGENCIES	ADDRESS
2005 Draft EIR:	
Ramona Municipal Water District	105 Earlham Street Ramona, CA 92065-1599

San Diego Local Agency Formation Commission	1600 Pacific Highway, Room 452 San Diego, CA 92101
City of San Diego Operations Division, Water Department	2797 Caminito Chollas San Diego, CA 92105-5097
City of Poway	13325 Civic Center Drive Poway, CA 92074

Revised Draft EIR:

Ramona Municipal Water District	105 Earlham Street Ramona, CA 92065-1599
San Diego Local Agency Formation Commission	1600 Pacific Highway, Room 452 San Diego, CA 92101

ORGANIZATIONS	ADDRESS
2005 Draft EIR:	
San Diego County Archaeological Society	P.O. Box 81106 San Diego, CA 92138
Endangered Habitats League	8424-A Santa Monica Blvd., Suite 592 Los Angeles, CA 90069-4267
Procopio, Cory, Hargreaves & Savitch c/o McGuire Family Trust	530 B Street, Suite 2100 San Diego, CA 92101-4469
Mussey Grade Road Alliance	P.O. Box 683 Ramona, CA 92065
Ramona Community Planning Group	15873 Highway 67 Ramona, CA 92065
Revised Draft EIR:	
Endangered Habitats League	8424-A Santa Monica Blvd., Suite 592 Los Angeles, CA 90069-4267
Procopio, Cory, Hargreaves & Savitch c/o McGuire Family Trust	530 B Street, Suite 2100 San Diego, CA 92101-4469

Mussey Grade Road Alliance	P.O. Box 683 Ramona, CA 92065
Ramona Community Planning Group	15873 Highway 67 Ramona, CA 92065

INDIVIDUALS	ADDRESS
2005 Draft EIR:	
Janet Gilbert	None Given
Charlotte Hambly	847 B Street Ramona, CA 92065
Kristi Mansolf	15873 Highway 67 Ramona, CA 92065
Carolyn Dorroh	17235 Voorhes Lane Ramona, CA 92065
Heather Thompson	iplay3rd@earthlink.com
Revised Draft EIR:	
Dr. Luauna Stines	P.O. Box 2677 Ramona, CA 92065
Carolyn Dorroh	17235 Voorhes Lane Ramona, CA 92065

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SALVATION ARMY RESPONSE TO PUBLIC COMMENTS

Introduction

The County Department of Planning and Land Use is recommending approval of Reduced Project Alternative I, rather than the Preferred Alternative, as analyzed in the DEIR. The Reduced Project Alternative I, discussed in detail in DEIR Section 4.3, would reduce the Education Camp and Multi-Purpose Building. This alternative would also reduce the retreat component and eliminate the yurt camp and a presentation area. Implementation of this alternative would result in project footprint reduction by 11,150 square feet with an overall camp capacity reduction of 133 users when compared to the proposed project.

The Reduced Project Alternative I would reduce or avoid project-related significant impacts to a greater extent than the Preferred Alternative as analyzed in the DEIR, while meeting all but one project objective. Specifically, locating the Retreat Center in close proximity to the remaining camp facilities conflicts with project objective number 4 (EIR Section 1.2). However, the significant and unmitigated impacts associated with the Preferred Project, related to conflicts with the MSCP (Biological Resource) and the General Plan Conservation Element (Land Use) would not occur under the Reduced Project Alternative I.

Furthermore, the proposed staff housing component of the site plan has been modified (referred to as Area 1, see EIR Figures 1-5 and 1-6). The proposed location of two staff housing buildings has been changed to ensure that the 25-foot buffer from RPO wetlands would be maintained in that portion of the project site. No additional impact would result from this change as the buildings would be relocated within an area already assumed as impacted under Reduced Project Alternative I. Also, after further review and analysis, and to comply with the BMO's Preserve Design Criteria (goals and criteria #4), the project's proposed open space easement has been revised to increase the amount of preserved area and decrease the amount of edge, and/or provide greater connectivity through the project site and with off-site preserve lands (thereby reducing non-preserve edge). The revised open space configuration creates more significant blocks of preserved habitat to reduce edge effects and to maximize the ratio of area to the perimeter of conserved habitats, while providing connectivity with off-site preserve lands, ensuring compliance with the MSCP Preserve Design Criteria. The revised open space configurations maximize the habitat structural diversity of conserved habitat areas. The revised easement configurations also provide more conserved habitat than is required for habitat-based mitigation, resulting in a net preservation gain over development.

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Salvation Army Division Camp and Retreat Center

Final EIR

Response to Comments

on the

April 2008 Revised Draft EIR

Comment
Letter A

From: Cara_McGary@fws.gov [mailto:Cara_McGary@fws.gov]
Sent: Friday, June 20, 2008 1:36 PM
To: Blackson, Kristin
Subject: Salvation Army Divisional Camp and Retreat (FWS-SDG-08B0571/08TA0642)

Hi Kristin,

Thanks for talking to me about this project today and confirming that Alternative 1 is now the proposed project. I understand that this alternative design will avoid impacts to wildlife corridor and stream area in a manner that will make the project meet the County's BMO consistency findings. A-1

In section 2.2.4.3, the EIR says:
"Prior to construction within 300 feet of potential raptor nesting habitat (i.e., riparian or woodland habitat) to be conducted during the raptor breeding season (February 15 through June 1), the area within 300 feet of the construction footprint shall be surveyed for the presence of nesting raptors. If active nests are present, construction within 300 feet of the active nest will be delayed until the conclusion of the breeding seasonnest is abandoned."
Please adjust the survey area to within 500 feet from the construction footprint. This is the standard avoidance distance for most raptor nests. A-2

I checked the oak mitigation ratios and acreage again and they are correct, I just misread part of the mitigation measure and got confused. A-3

Thanks again for moving forward with a less impactful alternative.

Cara McGary

Fish and Wildlife Biologist
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92011

phone: (760) 431-9440 ext. 374
fax: (760) 431-5901
email: cara_mcgary@fws.gov

RESPONSE TO COMMENT LETTER FROM U.S. FISH AND WILDLIFE SERVICE, SIGNED BY CARA MCGARY, DATED JUNE 20, 2008

Response to Comment A-1:
The comment is correct. The Applicant's Preferred Project would conflict with the County's Biological Mitigation Ordinance (BMO) and Resource Protection Ordinance (RPO). The conflict is avoided under both the Reduced Project Alternative I and Alternative II. Although the Applicant's Preferred Project is still the project analyzed by the EIR, CEQA requires the identification and analysis of an alternative, which would reduce significant impacts to less than significant levels. Therefore, the Reduced Project Alternative I is the project alternative that is being presented to the decision-makers.

Response to Comment A-2:
The County concurs with the comment. As such, Mitigation Measure MM 2.2.j has been revised as follows:

MM 2.2.j Prior to construction within ~~300~~ 500 feet of potential raptor nesting habitat (i.e., riparian or woodland habitat) to be conducted during the raptor breeding season (February 15 through ~~June 1~~July 15), the area within ~~300~~ 500 feet of the construction footprint shall be surveyed for the presence of nesting raptors. If active nests are present, construction within ~~300~~ 500 feet of the active nest will be delayed until the nest is abandoned.

Response to Comment A-3:
Comment noted.

Comment Letter B

STATE OF CALIFORNIA Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net

May 2, 2008

RECEIVED
MAY 05 2008
DPLU - PPCC

Ms. Kristin Blackson, Environmental Analyst
COUNTY OF SAN DIEGO DEPARTMENT OF PLANNING AND LAND USE
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Re: SCH#2000031058; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Salvation Army Divisional Camp & Retreat Project (P70-379w2, ER 98-14-023); San Diego County, California

Dear Ms. Blackson:

The Native American Heritage Commission is the state agency designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c (CEQA guidelines). Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS) for possible 'recorded sites' in locations where the development will or might occur.. Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ http://www.ohp.parks.ca.gov. The record search will determine:

- If a part or the entire APE has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

√ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ Contact the Native American Heritage Commission (NAHC) for:

- A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section: .

- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE). In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s).

√ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- A culturally-affiliated Native American tribe may be the only source of information about a Sacred Site/Native American cultural resource.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

B1

RESPONSE TO COMMENT LETTER FROM NATIVE AMERICAN HERITAGE COMMISSION, SIGNED BY DAVE SINGLETON, DATED MAY 2, 2008

Response to Comment B-1:

As part of the environmental review of this project, County of San Diego qualified archaeologist Sinead N. Ghabhláin with ASM Affiliates conducted a cultural resources survey in March 2001. One historic site was identified consisting of a late 1930's historic building with associated foundation pads and trash dump. The survey, along with a search of the historic records, determined that this resource does not retain integrity of design, workmanship or materials and is not significant under CEQA or County RPO.

An earlier survey conducted by ASM Affiliates in February 1999 included a records search and a field survey. The survey determined that there are five prehistoric archaeological sites located within the project footprint.

Subsequently, four of these sites were tested and evaluated between February 1999 and March 2000 and determined not to meet the requirements of significance in accordance with the CEQA Guidelines and the County of San Diego Resource Protection Ordinance (RPO). The evaluation was conducted under the direction of County approved archaeologist, John R. Cook with ASM Affiliates. The fifth site was not tested since it will be within a riparian open space easement.

Letters have been sent to the Native American individuals/organizations provided by the NAHC for their input. See response to comments item JCR-1 (May 2005 DEIR) for a list of the tribes contacted and the follow-up responses. No responses were received from these tribes as a result of this recent consultation. However, Carmen Lucas, Kwaaymii Laguna Band Elder, called the County on August 8, 2005 concerning this project and strongly recommended that grading monitoring be required.

The County concurs that lack of surface evidence of archaeological resources does not preclude the existence of archaeological resources. The request to include a provision for the accidental discovery of archaeological resources or human remains is provided by the ordinance. Section 87.429 of the San Diego County Grading, Clearing, and Watercourses Ordinance requires that, "if, in the process of grading operations, human remains or Native American artifacts are encountered, grading operations shall be suspended in that area and the operator shall immediately inform the County Official, and the requirements of the Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.99 shall be complied with." Therefore, the project will comply with the comment because the Grading Ordinance requires grading monitoring. The Final EIR on page 2.6-6 has been revised to clarify the Grading Ordinance requirement.

Comment Letter B (cont'd.)

√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

- CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

√ Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

B-1 (cont'd.)

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

Native American Contacts
San Diego County
May 2, 2008

Letter B
Attachment

Barona Group of the Capitan Grande
Rhonda Welch-Scalco, Chairperson
095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
619) 443-6612
619-443-0681

Viejas Band of Mission Indians
Bobby L. Barrett, Chairperson
PO Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
daquilar@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 Diegueno
Boulevard , CA 91905
619) 478-2113
619-478-2125

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center , CA 92082
760) 749-3200
760) 749-3876 Fax

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O Box 270 Diegueno
Santa Ysabel , CA 92070
mesagrandeband@msn.com
(760) 782-3818
(760) 782-9092 Fax

Santa Ysabel Band of Diegueno Indians
Johnny Hernandez, Spokesman
PO Box 130 Diegueno
Santa Ysabel , CA 92070
brandietaylor@yahoo.com
760) 765-0845
760) 765-0320 Fax

Kumeyaay Cultural Heritage Preservation
Paul Cuero
36190 Church Road, Suite 5 Diegueno/ Kumeyaay
Campo , CA 91906
chairman@campo-nsn.gov
(619) 478-9046
(619) 478-9505
(619) 478-5818 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed, SCH#2000031058; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Salvation Army Divisional Camp & Retreat - P70-379w2; Log No. 98-14-023; located in the Ramona Community Plan Area; San Diego County, California.

RESPONSE TO COMMENT LETTER FROM NATIVE AMERICAN HERITAGE COMMISSION, SIGNED BY DAVE SINGLETON, DATED MAY 2, 2008

(CONTINUED)

Attachment to Letter B-1:
This attachment provides a list of Native American Contacts. Please see response to comment JCR-1 (2005 Draft EIR).

Native American Contacts
San Diego County
May 2, 2008

Letter B
Attachment
(cont'd.)

waaymii Laguna Band of Mission Indians
armen Lucas
.O. Box 775 Diegueno -
ine Valley , CA 91962
519) 709-4207

aja Band of Mission Indians
ebecca Osuna, Spokesperson
09 S. Maple Street Diegueno
scondido , CA 92025
760) 737-7628
760) 747-8568 Fax

umeyaay Cultural Repatriation Committee
teve Banegas, Spokesperson
095 Barona Road Diegueno/Kumeyaay
akeside , CA 92040
519) 742-5587
519) 443-0681 FAX

lint Linton
.O. Box 507 Diegueno/Kumeyaay
anta Ysabel , CA 92070
760) 803-5694
jlinton73@aol.com

his list is current only as of the date of this document.

istribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and afety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list is only applicable for contacting local Native American with regard to cultural resources for the proposed, CH#2000031058; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Salvation Army ivisional Camp & Retreat - P70-379w2; Log No. 98-14-023; located in the Ramona Community Plan Area; San iego County, California.

Comment Letter C

State of California – The Resources Agency ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME

http://www.dfg.ca.gov
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201

June 10, 2008

Kristin Blackson, Project Manager
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Comments on the Notice of Availability of a Recirculated Draft Environmental Impact Report for the Salvation Army Divisional Camp and Retreat (P70-379W², Log No. 98-14-023, SCH No. 200031058)

Dear Ms. Blackson:

The California Department of Fish and Game (Department) has reviewed the above-referenced revised Draft Environmental Impact Report (DEIR) dated April 28, 2008. The Department has identified potential effects of this project on wildlife and sensitive habitats. The comments provided herein are based on the information provided in the recirculated DEIR, our knowledge of sensitive and declining vegetation communities, and our participation in regional conservation planning efforts.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Sections 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) Program. The County of San Diego (County) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan for which this project is located within (Metro-Lakeside-Jamul Segment).

As referenced in the DEIR executive summary, the "Preferred Project" that was proposed in the February 2005 Salvation Army Divisional Camp and Retreat DEIR is no longer under consideration for review/approval by the decision makers. Per the revised DEIR, the preferred project would have resulted in significant and unmitigated impacts related to the County's MSCP Subarea Plan (Biological Resources) and the General Plan Conservation Element (Land Use). The Reduced Project Alternatives I and II remain under consideration to be carried forward to the decision makers for consideration. The two alternative designs would result in a reduction of the original proposed project footprint (i.e., limiting the size and numbers of structures or entirely removing development from an area), consequently reducing impacts to sensitive biological resources. These modifications would also result in a reduction of the user base capacity of the camp (Preferred Project originally designed for 748 users and subsequently reduced to 615 users under Alternative I and 513 users under Alternative II). Finally, there would be an increase in the acreage conserved for open space (prior proposal would have conserved approximately 278 acres, whereas alternative designs would preserve approximately 395 acres of lands).

Introductory Comments

Conserving California's Wildlife Since 1870

RESPONSE TO COMMENT LETTER FROM DEPARTMENT OF FISH AND GAME, SIGNED BY EDMUND J. PERT, DATED JUNE 10, 2008

Introductory Comments:

The first page of this comment letter provides introductory comments regarding the Department of Fish and Game's status as a Trustee Agency and a Responsible Agency pursuant to CEQA Guidelines 15386 and 15381. The County acknowledges this comment. The Final EIR identifies the California Department of Fish and Game as a Responsible Agency (e.g., Section 1.3.1 Matrix of Project Approvals/Permits, page 1-15). The introductory paragraphs to this comment letter also summarize basic project information as presented in the EIR. As such, no further response to these introductory paragraphs is necessary.

Comment Letter C (cont'd.)

Ms. Blackson
June 10, 2008
Page 2 of 3

We offer the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with all applicable requirements of the approved Subarea Area:

1. The Department acknowledges the efforts put forth in developing a site-plan that incorporates design features which minimize impacts to sensitive biological resources. We strongly encourage consideration be given to select the design alternative that clearly avoids and minimizes impacts (e.g., reduction of development footprint or user base) to native vegetation communities and associated species to maximum extent practicable (CEQA Guideline Section 15021(a)(2). C-1

2. The Department acknowledges the mitigation measure that would require approximately 395 acres of open space be placed under a conservation easement, naming the Department as third party beneficiary. We have attached for the Salvation Army and County's use a conservation easement template (April 2005) that has been approved as to form by the Department's legal counsel. If the template is not substantially changed it should be readily signed by legal counsel. In regards to future submittals, we request that County staff allot adequate time by the Department's staff in Region and legal counsel for review of any conservation easement-related documents. Future submittals should also include the approved the Habitat Management Plan and associated endowment documentation to ensure availability of adequate funding for management of the property in perpetuity. C-2

3. The final EIR should clearly define that all areas associated with the subsurface sewage disposal system (both primary and reserve disposal field areas) not encroach into designated biological open space areas. C-3

4. Mitigation Measure 2.2.i. referenced the breeding season for the California gnatcatcher occurring from March 1- July 1. The July 1 date should be revised to August 15 in accordance with the Multiple Species Conservation Program Plan. C-4

5. The Department recommends that Mitigation Measures association with jurisdictional waters be amended to include a condition which identifies that "prior to the project applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake that the project applicant shall submit a complete Lake or Streambed Alteration Program notification package and fee to the California Department of Fish and Game". C-5

6. In order to comply with Section 3503 and 3503.5 of the Fish and Game Code and minimize impacts to breeding birds, including migratory birds, we recommend that the County incorporate the following standard conservation measures into Mitigation Measure 2.2.j:

   To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat, should occur outside of the breeding season (January 15 to August 15). If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a County-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 100-feet of the construction area Federally- or State-listed birds (e.g., coastal California gnatcatcher, least Bell's vireo) on or within 300-feet of the construction area and nesting raptors within 500-feet of the construction area. The pre- C-6

RESPONSE TO COMMENT LETTER FROM DEPARTMENT OF FISH AND GAME, SIGNED BY EDMUND J. PERT, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment C-1:
The County concurs with this comment. Reduced Project Alternative I, which would reduce significant biological resources impacts to less than significant, is the project alternative that is being presented to the decision-makers.

Response to Comment C-2:
The open space easement, including third-party beneficiary, would be completed and executed if the proposed project is approved. The timing of approval of the final Habitat Management Plan (HMP) would be prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits. Therefore, the HMP would be finalized and implemented prior to the actual occurrence of any biological impact. The HMP prepared for the proposed biolagical open space and the associated endowment documentation will be provided to the Department of Fish and Game for review as requested by the comment. However, the County's approval of the HMP is not contingent upon approval by the Department of Fish and Game.

The comment included a conservation easement template (April 2005). As stated above, the open space easement, including third-party beneficiary, would be completed and executed if the project is approved. The County cannot require dedication af a conservation easement as a condition of approving a project (Civil Code, section 815.3(b)). As such, no further response to the Attachment is necessary.

Response to Comment C-3:
Biological impacts of the proposed project are limited to the development footprint (area of disturbance and assumed impacts), which includes the septic system leach fields. The Final EIR identifies the limits of disturbance, which includes all septic system leach fields and equipment. Septic system leach fields will not encroach into designated biological open space areas (see Final EIR Attachment A)).

Response to Comment C-4:
The County concurs with the comment. Mitigation Measure 2.2.i has been revised as follows:

MM 2.2.i Construction activities shall be prohibited during the California gnatcatcher breeding season (March 1 - ~~July 1~~ August 15) unless nest monitoring is conducted by a qualified biologist and results indicate the absence of active nests or the completion of the breeding season.

RESPONSE TO COMMENT LETTER FROM DEPARTMENT OF FISH AND GAME, SIGNED BY EDMUND J. PERT, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment C-5:
In compliance with the Fish and Game Code, a Lake or Streambed Alteration Program notification package and fee would be submitted to the CDFG if the proposed project or one of the alternatives is approved. The Final EIR identifies the need for a Streambed Alteration Agreement in Section 1.3.1 Matrix of Project Approvals/Permits (Page 1-15). Therefore, no additional mitigation is proposed.

Response to Comment C-6:
The County concurs with the comment. The distance of 300 feet from potential raptor nesting habitat stated in the comment has been changed to 500 feet per comment A2. Mitigation Measure 2.2.j has been revised as follows to include CDFG's proposed text:

MM 2.2.j Prior to construction within ~~300~~500 feet of potential raptor nesting habitat (i.e., riparian or woodland habitat) to be conducted during the raptor breeding season (~~February~~January 15 through ~~June~~August 15), the area within ~~300~~500 feet of the construction footprint shall be surveyed for the presence of nesting raptors. If active nests are present, construction within ~~300~~500 feet of the active nest will be delayed until the nest is abandoned.

To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat, should occur outside of the breeding season (January 15 to August 15). If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the applicant shall retain a County-approved biologist to conduct a pre-construction survey to determine the presence of non-listed nesting migratory birds on or within 100-feet of the construction area, Federally- or State-listed birds (e.g., coastal California gnatcatcher, least Bell's Vireo) on or within 300-feet of the construction area and nesting raptors within 500-feet of the construction area. The preconstruction survey must be conducted within 10 calendar days prior to the start of construction. The results of the survey must be submitted to the County for review and approval prior to initiating any construction activities. If nesting birds are detected by the County-approved biologist, the following buffers should be established: 1) no work within 100 feet of a non-listed nesting migratory bird nest, 2) no work within 300 feet of a listed bird nest, and 3) no work within 500 feet of a raptor nest. However, the County may reduce these buffer widths depending on site-specific conditions (e.g., the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant should contact the County to determine the appropriate buffer.

Comment Letter C (cont'd.)

Ms. Blackson
June 10, 2008
Page 3 of 3

construction survey must be conducted within 10 calendar days prior to the start of construction. The results of the survey must be submitted to the County for review and approval prior to initiating any construction activities. If nesting birds are detected by the County-approved biologist, the following buffers should be established: 1) no work within 100 feet of a non-listed nesting migratory bird nest, 2) no work within 300 feet of a listed bird nest, and 3) no work within 500 feet of a raptor nest. However, the County may reduce these buffer widths depending on site-specific conditions (e.g. the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant should contact the County to determine the appropriate buffer.

A bio-monitor shall be present on-site during all initial grubbing and clearing of vegetation to ensure that perimeter construction fencing is being maintained and to minimize the likelihood that nests containing eggs or chicks are abandoned or fails due to construction activity. A bio-monitor shall also perform periodic inspections of the construction site during all major grading to ensure that impacts to sensitive plants and wildlife are minimized. These inspections should take place once or twice a week, as defined by the County, depending on the sensitivity of the resources. The bio-monitor shall send weekly monitoring reports to the County and shall notify both the County and the Department immediately if clearing is done outside of the permitted project footprint.

C-6 (cont'd.)

We appreciate the opportunity to comment on the revised DEIR for this project and to assist the County in further minimizing and mitigating project impacts to biological resources. If you have questions or comments regarding this letter, please contact Paul Schlitt at (858) 637-5510.

Sincerely,

Edmund J. Pert
Regional Manager
South Coast Region

Enclosure (1) CDFG Conservation Easement Deed template

cc: State Clearinghouse, Sacramento
Paul Schlitt, San Diego

EP:ps

RESPONSE TO COMMENT LETTER FROM DEPARTMENT OF FISH AND GAME, SIGNED BY EDMUND J. PERT, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment C-6: (cont'd.)

A bio-monitor shall be present on-site during all initial grubbing and clearing of vegetation to ensure that perimeter construction fencing is being maintained and to minimize the likelihood that nests containing eggs or chicks are abandoned or fails due to construction activity. A bio-monitor shall also perform periodic inspections of the construction site during all major grading to ensure that impacts to sensitive plants and wildlife are minimized. These inspections should take place once or twice a week, as defined by the County, depending on the sensitivity of the resources. The bio-monitor shall send weekly reports to the County and shall notify both the County and the Department immediately if clearing is done outside of the permitted project footprint.

PLEASE NOTE: The following sample Conservation Easement Deed is provided for reference. The Department of Fish and Game updates this document as needed, and it does not necessarily contain all provisions appropriate for a given project.

RECORDING REQUESTED BY AND)
WHEN RECORDED MAIL TO:)
)
)
)
)
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)

Space Above Line for Recorder's Use Only

CONSERVATION EASEMENT DEED
(Including Third-Party Beneficiary)

THIS CONSERVATION EASEMENT DEED is made this _____ day of _____, 20____, by _____ ("Grantor"), in favor of _____ ("Grantee"), with reference to the following facts:

RECITALS

A. Grantor is the sole owner in fee simple of certain real propertycontaining approximately _____ acres, located in the County of _____, State of California, designated Assessor's Parcel Number(s) _____ and more particularly described in Exhibit A attached hereto and incorporated herein by this reference (the "Property").

B. The Property possesses wildlife and habitat values (collectively, "conservation values") of great importance to Grantee, the California Department of Fish and Game ("CDFG"), and the people of the State of California.

C. The Property provides high quality habitat for [*list plant and/or animal species*] and contains [*list habitats; native and/or non-native*].

D. Grantee is authorized to hold conservation easements pursuant to Civil Code Section 815.3. Specifically, Grantee is [*choose applicable statement: a tax-exempt nonprofit organization qualified under section 501(c)(3) of the Internal Revenue Code of 1986, as amended, and qualified to do business in California which has as its primary purpose the preservation of land in its natural, scenic, forested or open space condition or use OR a governmental entity identified in Civil Code Section 815.3(b) and otherwise authorized to acquire and hold title to real property*].

E. CDFG has jurisdiction, pursuant to Fish and Game Code Section 1802, over the conservation, protection, and management of fish, wildlife, native plants andthe habitat necessary for biologically sustainable populations of those species, and CDFG is authorized to

PLEASE NOTE: The following sample Conservation Easement Deed is provided for reference. The Department of Fish and Game updates this document as needed, and it does not necessarily contain all provisions appropriate for a given project.

hold easements for these purposes pursuant to Civil Code Section 815.3, Fish and Game Code Section 1348, and other provisions of California law.

F. This Conservation Easement provides mitigation for certain impacts of [*describe project*] located in the City of [_____], County of [_____], State of California, pursuant to [*choose and complete applicable statement: California Endangered Species Act Incidental Take Permit No. [_____] by and between [_____] and CDFG, dated [_____] OR the Agreement Regarding Proposed Stream or Lake Alteration (Notification No. [_____]) ("Section 1603 Agreement") executed by [_____] and CDFG, dated [_____] OR the [document prepared pursuant to CEQA] certified by the [_____] for [project] (SCH No.[_____]) dated [_____], and the Mitigation Plan created thereunder.*]

COVENANTS, TERMS, CONDITIONS AND RESTRICTIONS

For good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, and pursuant to California law, including Civil Code Section 815,*et seq.*, Grantor hereby voluntarily grants and conveys to Grantee a conservation easement in perpetuity over the Property.

1. Purposes. The purposes of this Conservation Easement are to ensure the Property will be retained forever inits natural condition and to prevent any use of the Property that will impair or interfere with the conservation values of the Property. Grantor intends that this Conservation Easement will confine the use of the Property to such activitiesthat are consistent with those purposes, including, without limitation, those involving the preservation, restoration and enhancement of native species and their habitats.

2. Grantee's Rights. To accomplish the purposes of this Conservation Easement, Grantor hereby grants and conveys the following rights to Granteeand to CDFG as a third party beneficiary of this Conservation Easement:

(a) To preserve and protect the conservation values of the Property;

(b) To enter upon the Property at reasonable times in order to monitor compliance with and otherwise enforce the terms of this Conservation Easement, and for scientific research and interpretive purposes by Grantee or its designeesand CDFG or its designees, provided that neither Grantee nor CDFG shall unreasonably interfere with Grantor's authorized use and quiet enjoyment of the Property;

(c) To prevent any activity on or use of the Property that is inconsistent with the purposes of this Conservation Easement and to require the restoration of such areas or features of the Property that may be damaged by any act, failure to act, or any use that is inconsistent with the purposes of this Conservation Easement;

(d) All mineral, air and water rights necessary to protect and to sustain the biological resources of the Property; and

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(e) All present and future development rights allocated, implied, reserved or inherent in the Property; such rights are hereby terminated and extinguished, and may not be used on or transferred to any portion of the Property, nor any other property adjacent or otherwise.

3. Prohibited Uses. Any activity on or use of the Property inconsistent with the purposes of this Conservation Easement is prohibited. Without limiting the generality of the foregoing, the following uses and activities by Grantor, Grantor's agents, and third parties, are expressly prohibited:

(a) Unseasonal watering; use of fertilizers, pesticides, biocides, herbicides or other agricultural chemicals; weed abatement activities; incompatible fire protection activities; and any and all other activities and uses which may adversely affect the purposes of this Conservation Easement;

(b) Use of off-road vehicles and use of any other motorized vehicles except on existing roadways;

(c) Agricultural activity of any kind, except that grazing is permitted if done in accordance with a CDFG-approved grazing or management plan;

(d) Recreational activities including, but not limited to, horseback riding, biking, hunting or fishing, except as may be specifically permitted under this Conservation Easement;

(e) Commercial or industrial uses;

(f) Any legal or de facto division, subdivision or partitioning of the Property;

(g) Construction, reconstruction or placement of any building, billboard or sign, or any other structure or improvement of any kind;

(h) Depositing or accumulation of soil, trash, ashes, refuse, waste, bio-solids or any other materials;

(i) Planting, introduction or dispersal of non-native or exotic plant or animal species;

(j) Filling, dumping, excavating, draining, dredging, mining, drilling, removing or exploring for or extraction of minerals, loam, soil, sands, gravel, rocks or other material on or below the surface of the Property;

(k) Altering the surface or general topography of the Property, including building of roads;

Letter C
Attachment
(cont'd.)

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(l) Removing, destroying, or cutting of trees, shrubs or other vegetation, except as required by law for (1) fire breaks, (2) maintenance of existing foot trails or roads, or (3) prevention or treatment of disease; and

(m) Manipulating, impounding or altering any natural water course, body of water or water circulation on the Property, and activities or uses detrimental to water quality, including but not limited to degradation or pollution of any surface or sub-surface waters.

4. Grantor's Duties. Grantor shall undertake all reasonable actions to prevent the unlawful entry and trespass by persons whose activities may degrade or harm the conservation values of the Property. In addition, Grantor shall undertake all necessary actions to perfectthe rights of Grantee and CDFG under Section 2 of this Conservation Easement, including but not limited to, Grantee's water rights.

5. Reserved Rights. Grantor reserves to itself, and to its personal representatives, heirs, successors, and assigns, all rights accruing from its ownership of the Property, including the right to engage in or to permit or invite others to engage in all uses of the Property that are not expressly prohibited or limited by, and areconsistent with the purposes of, this Conservation Easement.

6. Grantee's Remedies. CDFG, as a third party beneficiary of this Conservation Easement, shall have the same rights as Grantee under this section to enforce the terms of this Conservation Easement. If Grantee determines that a violation of the terms of this Conservation Easement has occurred or is threatened, Grantee shall give written notice to Grantor of such violation and demand in writing the cure of such violation. At the time of giving any such notice, Grantee shall give a copy of the notice to CDFG. If Grantor fails to cure the violation within fifteen (15) days after receipt of written notice and demand from Grantee, or if the cure reasonably requires more than fifteen (15) days to complete and Grantor fails to begin the cure within the fifteen (15)-day period or fails to continue diligently to complete the cure, Grantee may bring an action at law or in equity in a court of competent jurisdiction to enforce the terms of this Conservation Easement, to recover any damages to which Grantee may be entitled for violation of the terms of this Conservation Easement or for any injury to the conservation values of the Property, to enjoin the violation, *ex parte* as necessary, by temporary or permanent injunction without the necessity of proving either actual damages or the inadequacy of otherwise available legal remedies, or for other equitable relief, including, but not limited to, the restoration of the Property to the condition in which it existed prior to any such violation or injury. Without limiting Grantor's liability therefor, Grantee may apply any damages recovered to the cost of undertaking any corrective action on the Property.

If Grantee, in its sole discretion, determines that circumstances require immediate action to prevent or mitigate damage to the conservation values of the Property, Grantee may pursue its remedies under this Section 6 without prior notice to Grantor or without waiting for the period provided for cure to expire. Grantee's rights under this section apply equally to actual or threatened violations of the terms of this ConservationEasement.

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Grantor agrees that Grantee's remedies at law for any violation of the terms of this Conservation Easement are inadequate and that Grantee shall be entitled to the injunctive relief described in this section, both prohibitive and mandatory, in addition to such other relief to which Grantee may be entitled, including specific performance of the terms of this Conservation Easement, without the necessity of proving either actual damages or the inadequacy of otherwise available legal remedies. Grantee's remedies described in this section shall be cumulative and shall be in addition to all remedies now or hereafter existing at law or in equity, including but not limited to, the remedies set forth in Civil Code Section 815,*et seq.*, inclusive. The failure of Grantee to discover a violation or to take immediate legal action shall not bar Grantee from taking such action at a later time.

If at any time in the future Grantor or any subsequent transferee uses or threatens to use the Property for purposes inconsistent with this Conservation Easement then, notwithstanding Civil Code Section 815.7, the California Attorney General or any entity or individual with a justiciable interest in the preservation of this Conservation Easement has standing as interested parties in any proceeding affecting this Conservation Easement.

6.1. Costs of Enforcement. Any costs incurred by Grantee or CDFG, where it is the prevailing party, in enforcing the terms of this Conservation Easement against Grantor, including, but not limited to, costs of suit and attorneys' and experts' fees, and any costs of restoration necessitated by Grantor's negligence or breach of this Conservation Easement shall be borne by Grantor.

6.2. Discretion of Grantee and CDFG. Enforcement of the terms of this Conservation Easement by Grantee or CDFG shall be at the discretion of the enforcing party, and any forbearance by Grantee or CDFG to exercise its rights under this Conservation Easement in the event of any breach of any term of this Conservation Easement shall not be deemed or construed to be a waiver by Grantee or CDFG of such term or of any subsequent breach of the same or any other term of this Conservation Easement or of any of Grantee's rights (or any rights of CDFG as a third party beneficiary) under this Conservation Easement. No delay or omission by Grantee or CDFG in the exercise of any right or remedy shall impair such right or remedy or be construed as a waiver.

6.3. Acts Beyond Grantor's Control. Nothing contained in this Conservation Easement shall be construed to entitle Grantee or CDFG to bring any action against Grantor for any injury to or change in the Property resulting from (i) any natural cause beyond Grantor's control, including, without limitation, fire not caused by Grantor, flood, storm, and earth movement, or any prudent action taken by Grantor under emergency conditions to prevent, abate, or mitigate significant injury to the Property resulting from such causes; or (ii) acts by Grantee or its employees or CDFG or its employees.

6.4. Department of Fish and Game Right of Enforcement. All rights and remedies conveyed to Grantee under this Conservation Easement Deed shall extend to and are enforceable by CDFG. These rights are in addition to, and do not limit, the rights of enforcement under [*insert title of permit/Agreement described in RecitalF, above*].

Letter C
Attachment
(cont'd.)

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7. Fence Installation and Maintenance. Grantor shall install and maintain a fence reasonably satisfactory to Grantee and CDFG around the Conservation Easement area to protect the conservation values of the Property, including but not limited to wildlife corridors.

8. Access. This Conservation Easement does not convey a general right of access to the public.

9. Costs and Liabilities. Grantor retains all responsibilities and shall bear all costs and liabilities of any kind related to the ownership, operation, upkeep,and maintenance of the Property. Grantor agrees that neither Grantee nor CDFG shall have any duty or responsibility for the operation, upkeep or maintenance of the Property, the monitoring of hazardous conditions thereon, or the protection of Grantor, the public or any third parties from risks relating to conditions on the Property. Grantor remains solely responsible for obtaining any applicable governmental permits and approvals for any activity or use permitted by this Conservation Easement Deed, and any activity or use shall be undertaken in accordance with all applicable federal, state, local and administrative agency statutes, ordinances, rules, regulations, orders and requirements.

9.1. Taxes; No Liens. Grantor shall pay before delinquency all taxes, assessments, fees, and charges of whatever description levied on or assessed against the Property by competent authority (collectively "taxes"), including any taxes imposed upon, or incurred as a result of, this Conservation Easement, and shall furnish Grantee and CDFG with satisfactory evidence of payment upon request. Grantor shall keep the Property free from any liens, including those arising out of any obligations incurred by Grantor for any labor or materials furnished or alleged to have been furnished to or for Grantor at or for use on the Property.

9.2. Hold Harmless. Grantor shall hold harmless, protect and indemnify Grantee and its directors, officers, employees, agents, contractors, and representatives and the heirs, personal representatives, successors and assigns of each of them (each a "Grantee Indemnified Party" and, collectively, "Grantee's Indemnified Parties") and CDFG and its directors, officers, employees, agents, contractors, and representatives, and the heirs, personal representatives, successors and assigns of each of them (each a "CDFG Indemnified Party" and, collectively, "CDFG's Indemnified Parties") from and against any and all liabilities, penalties, costs, losses, damages, expenses (including, without limitation, reasonable attorneys' fees and experts' fees), causes of action, claims, demands, orders, liens or judgments (each a "Claim" and, collectively, "Claims"), arising from or in any way connected with: (1) injury to or the death of any person, or physical damage to any property, resulting from any act, omission, condition, or other matter related to or occurring on or about the Property, regardless of cause, except that (a) this indemnification shall be inapplicable to Grantee's Indemnified Parties with respect to any Claim due solely to the negligence of Grantee or any of its employees and (b) this indemnification shall be

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inapplicable to CDFG's Indemnified Parties with respect to any Claim due solely to the negligence of CDFG or any of its employees; (2) the obligations specified in Sections 4, 9, and 9.1; and (3) the existence or administration of this Conservation Easement. If any action or proceeding is brought against any of the CDFG Indemnified Parties by reason of any such Claim, Grantor shall, at the election of and upon written notice from CDFG, defend such action or proceeding by counsel reasonably acceptable to the CDFG Indemnified Party or reimburse CDFG for all charges incurred for services of the California Attorney General in defending the action or proceeding.

9.3. Extinguishment. If circumstances arise in the future that render the purposes of this Conservation Easement impossible to accomplish, this Conservation Easement can only be terminated or extinguished, in whole or in part, by judicial proceedings in a court of competent jurisdiction.

9.4. Condemnation. The purposes of this Conservation Easement are presumed to be the best and most necessary public use as defined at Code of Civil Procedure Section 1240.680 notwithstanding Code of Civil Procedure Sections 1240.690 and 1240.700.

10. Transfer of Easement. This Conservation Easement is transferable by Grantee, but Grantee may assign this Conservation Easement only to CDFG or another entity or organization authorized to acquire and hold conservation easements pursuant to Civil Code Section 815.3 (or any successor provision then applicable) or the laws of the United States. Grantee shall require the assignee to record the assignment in the county where the Property is located.

11. Transfer of Property. Grantor agrees to incorporate the terms of this Conservation Easement by reference in any deed or other legal instrument by which Grantor divests itself of any interest in all or any portion of the Property, including, without limitation, a leasehold interest. Grantor further agrees to give written notice to Grantee and CDFG of the intent to transfer any interest at least thirty (30) days prior to the date of such transfer. Grantee or CDFG shall have the right to prevent subsequent transfers in which prospective subsequent claimants or transferees are not given notice of the covenants, terms, conditions and restrictions of this Conservation Easement. The failure of Grantor, Grantee or CDFG to perform any act provided in this section shall not impair the validity of this Conservation Easement or limit its enforceability in any way.

Letter C
Attachment
(cont'd.)

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12. Notices. Any notice, demand, request, consent, approval, or communication that any party desires or is required to give to the other parties shall be in writing and be served personally or sent by recognized overnight courier that guarantees next-day delivery or by first class mail, postage fully prepaid, addressed as follows:

To Grantor:

To Grantee:

To CDFG: Department of Fish and Game
[*Name of Region*]
[*Region's address*]
Attn: Regional Manager

With a copy to: Department of Fish and Game
Office of the General Counsel
1416 Ninth Street, 12th Floor
Sacramento, California 95814-2090
Attn: General Counsel

or to such other address as Grantor, Grantee or CDFG may designate by written notice to the other parties. Notice shall be deemed effective upon delivery in the case of personal delivery or delivery by overnight courier or, in the case of delivery by first class mail, five (5) days after deposit into the United States mail.

13. Amendment. This Conservation Easement may be amended by Grantor and Grantee only by mutual written agreement and subject to the prior written approval of CDFG. Any such amendment shall be consistent with the purposes of this Conservation Easement and California law governing conservation easements and shall not affect its perpetual duration. Any such amendment shall be recorded in the official records of [_____] County, State of California.

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14. General Provisions.

(a) Controlling Law. The interpretation and performance of this Conservation Easement shall be governed by the laws of the State of California, disregarding the conflicts of law principles of such state.

(b) Liberal Construction. Despite any general rule of construction to the contrary, this Conservation Easement shall be liberally construed to effect the purposes of this Conservation Easement and the policy and purpose of Civil Code Section 815, *et seq.* If any provision in this instrument is found to be ambiguous, an interpretation consistent with the purposes of this Conservation Easement that would render the provision valid shall be favored over any interpretation that would render it invalid.

(c) Severability. If a court of competent jurisdiction voids or invalidates on its face any provision of this Conservation Easement Deed, such action shall not affect the remainder of this Conservation Easement Deed. If a court of competent jurisdiction voids or invalidates the application of any provision of this Conservation Easement Deed to a person or circumstance, such action shall not affect the application of the provision to other persons or circumstances.

(d) Entire Agreement. This instrument sets forth the entire agreement of the parties with respect to the Conservation Easement and supersedes all prior discussions, negotiations, understandings, or agreements relating to the Conservation Easement. No alteration or variation of this instrument shall be valid or binding unless contained in an amendment in accordance with Section 13.

(e) No Forfeiture. Nothing contained herein will result in a forfeiture or reversion of Grantor's title in any respect.

(f) Successors. The covenants, terms, conditions, and restrictions of this Conservation Easement Deed shall be binding upon, and inure to the benefit of, the parties hereto and their respective personal representatives, heirs, successors, and assigns and shall constitute a servitude running in perpetuity with the Property.

(g) Termination of Rights and Obligations. A party's rights and obligations under this Conservation Easement terminate upon transfer of the party's interest in the Conservation Easement or Property, except that liability for acts or omissions occurring prior to transfer shall survive transfer.

Letter C
Attachment
(cont'd.)

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(h) Captions. The captions in this instrument have been inserted solely for convenience of reference and are not a part of this instrument and shall have no effect upon its construction or interpretation.

(i) No Hazardous Materials Liability. Grantor represents and warrants that it has no knowledge or notice of any Hazardous Materials (defined below) or underground storage tanks existing, generated, treated, stored, used, released, disposed of, deposited or abandoned in, on, under, or from the Property, or transported to or from or affecting the Property. Without limiting the obligations of Grantor under Section 9.2, Grantor hereby releases and agrees to indemnify, protect and hold harmless the Grantee Indemnified Parties and the CDFG Indemnified Parties (each as defined in Section 9.2) from and against any and all Claims (as defined in Section 9.2) arising from or connected with any Hazardous Materials or underground storage tanks present, alleged to be present, or otherwise associated with the Property at any time, except that (I) this indemnification shall be inapplicable to the Grantee Indemnified Parties with respect to any Hazardous Materials placed, disposed or released by Grantee, its employees or agents and (II) this indemnification shall be inapplicable to the CDFG Indemnified Parties with respect to any Hazardous Materials placed, disposed or released by CDFG, its employees or agents. This release and indemnification includes, without limitation, Claims for (i) injury to or death of any person or physical damage to any property; and (ii) the violation or alleged violation of, or other failure to comply with, any Environmental Laws (defined below). If any action or proceeding is brought against any of the CDFG Indemnified Parties by reason of any such Claim, Grantor shall, at the election of and upon written notice from CDFG, defend such action or proceeding by counsel reasonably acceptable to the CDFG Indemnified Party or reimburse CDFG for all charges incurred for services of the California Attorney General in defending the action or proceeding.

Despite any contrary provision of this Conservation Easement Deed, the parties do not intend this Conservation Easement to be, and this Conservation Easement shall not be, construed such that it creates in or gives to Grantee or CDFG any of the following:

(1) The obligations or liability of an "owner" or "operator," as those terms are defined and used in Environmental Laws (defined below), including, without limitation, the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (42 U.S.C. Section 9601 *et seq.*; hereinafter, "CERCLA"); or

(2) The obligations or liabilities of a person described in 42 U.S.C. Section 9607(a)(3) or (4); or

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(3) The obligations of a responsible person under any applicable Environmental Laws; or

(4) The right to investigate and remediate any Hazardous Materials associated with the Property; or

(5) Any control over Grantor's ability to investigate, remove, remediate or otherwise clean up any Hazardous Materials associated with the Property.

The term "Hazardous Materials" includes, without limitation, (a) material that is flammable, explosive or radioactive; (b) petroleum products, including by-products and fractions thereof; and (c) hazardous materials, hazardous wastes, hazardous or toxic substances, or related materials defined in CERCLA, the Resource Conservation and Recovery Act of 1976 (42 U.S.C. Section 6901 *et seq.*; hereinafter "RCRA"); the Hazardous Materials Transportation Act (49 U.S.C. Section 6901 *et seq.*; hereinafter "HTA"); the Hazardous Waste Control Law (California Health & Safety Code Section 25100 *et seq.*; hereinafter "HCL"); the Carpenter-Presley-Tanner Hazardous Substance Account Act (California Health & Safety Code Section 25300 *et seq.*; hereinafter "HSA"), and in the regulations adopted and publications promulgated pursuant to them, or any other applicable Environmental Laws now in effect or enacted after the date of this Conservation Easement Deed.

The term "Environmental Laws" includes, without limitation, CERCLA, RCRA, HTA, HCL, HSA, and any other federal, state, local or administrative agency statute, ordinance, rule, regulation, order or requirement relating to pollution, protection of human health or safety, the environment or Hazardous Materials. Grantor represents, warrants and covenants to Grantee and CDFG that activities upon and use of the Property by Grantor, its agents, employees, invitees and contractors will comply with all Environmental Laws.

(j) Warranty. Grantor represents and warrants that there are no outstanding mortgages, liens, encumbrances or other interests in the Property (including, without limitation, mineral interests) which have not been expressly subordinated to this Conservation Easement Deed, and that the Property is not subject to any other conservation easement.

(k) Additional Easements. Grantor shall not grant any additional easements, rights of way or other interests in the Property (other than a security interest that is subordinate to this Conservation Easement Deed), or grant or otherwise abandon or

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relinquish any water agreement relating to the Property, without first obtaining the written consent of Grantee and CDFG. Grantee or CDFG may withhold such consent if it determines that the proposed interest or transfer is inconsistent with the purposes of this Conservation Easement or will impair or interfere with the conservation values of the Property. This Section 14(k) shall not prohibit transfer of a fee or leasehold interest in the Property that is subject to this Conservation Easement Deed and complies with Section 11.

(l) Recording. Grantee shall record this Conservation Easement Deed in the Official Records of _____ County, California, and may re-record it at any time as Grantee deems necessary to preserve its rights in this Conservation Easement.

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IN WITNESS WHEREOF Grantor and Grantee have executed this Conservation Easement Deed the day and year first above written.

GRANTOR:	GRANTEE:
BY: _____	BY: _____
NAME: _____	NAME: _____
TITLE: _____	TITLE: _____
DATE: _____	DATE: _____

Approved as to form:

General Counsel
State of California
Department of Fish and Game

BY: _____
Ann S. Malcolm
General Counsel

Comment
Letter D

RAMONA MUNICIPAL WATER DISTRICT
105 Earlham Street
Ramona, California 92065-1599
Telephone:
(760) 789-1330

Sent via Email

January 10, 2008

Ms. Kristin Blackson
Environmental Coordinator/Planner III
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: Revised Draft Environmental Impact Report (RDEIR) for the Salvation Army Proposed Expansion of Major Use Permit for the Proposed Divisional Camp and Retreat Project MUP 70-379W², ER 98-14-023, SCH. NO. 2000031058
Ramona Fire District Service

Dear Ms. Blackson:

As stated in Appendix J to the Salvation Army Divisional Camp and Retreat, specifically the Fire Protection Plan, the expansion project as configured does NOT comply with the Ramona Fire Ordinance 02-245requirements for a secondary access at a location remote from the primary access. This is a specific requirement which was imposed on two separate occasions when the Board of Directors of the Ramona Municipal Water District considered this project and its impact upon the surrounding area(s). D-1

This specific requirement was based upon historical events, which proved beyond any doubt that Mussey Grade Road was and is a dangerously inadequate roadway for evacuation purposes in the event of a major wildfire. This is fact EVEN AS TO RESIDENTS NOW LIVING ALONG THE ROAD, not to mention the increased pressure on this sole exit from the area by the expansion of the camp and the resulting substantial increase in people and vehicles to be evacuated in the event of a major fire. The experience in the Cedar fire showed that Mussey Grade Road is a fragile and undependable evacuation route, for a number of reasons: D-2

1. The road is a one way in/one way out ingress and egress for all the residents of the area. There is one lane of traffic each way without adequate shoulders for the ingress and egress of emergency vehicles.

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RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY ROBERT E. KEYSAK, DATED JANUARY 10, 2008

Response to Comment D-1:
Secondary access is infeasible due to topographic, geological, environmental and economic constraints as described in Section 2.3, Hazards and Hazardous Materials of the RDEIR.

Since the release of the RDEIR (April 2008), the County has updated the governing fire code. The applicable fire code for this project is now the 2009 County of San Diego Consolidated Fire Code ratified by the County Board of Supervisors on November 13, 2009. See Health and Safety Code, section 13869.7(c). In addition, the State Board of Forestry and Fire Protection is anticipated to certify the Consolidated Fire Code under the State Responsibility Area (SRA) regulations. Therefore, the Consolidated Fire Code now applies in lieu of the SRA regulations, and "same practical effect," as that term is used in the SRA regulations, is no longer relevant. (California Code of Regulations, Title 14, section 1270). The Ramona Fire Code referenced in the comment (Ramona Fire Ordinance 02-045) does not apply to the project because that Ordinance was not included in the Consolidated Fire Code that the County ratified.

The Consolidated Fire Code does not require secondary access, but includes maximum dead end road lengths (Consolidated Fire Code Section 96.1.503.1.2). The project does not comply with the applicable maximum lengths.

The Code also includes the section 96.1.APP.104.8, "Modifications" which states, "Whenever there are practical difficulties involved in carrying out the provisions of this code, the fire code official shall have the authority to grant modifications for individual cases, provided the fire code official shall first find that special individual reasons make the strict letter of this code impracticable and the modification is in compliance with the intent and purpose af this code and that such modification does not lessen health, life and fire safety requirements."

Also, since the release of the RDEIR (April 2008), the Fire Protection Plan (FPP) was revised and submitted to RMWD Fire Services in November 2009. The RMWD Fire Services accepted the FPP on January 22, 2010 and the County Fire Code Specialist approved the FPP on February 2, 2010. The FPP includes justification for the approval of a modification for the project's failure to comply with the maximum dead-end road lengths (Section 5.2.1, pages 27 - 31).

Response to Comment D-2:
The comment describes existing hazardous conditions of Mussey Grade Road in the event of "major wildfire." These potential hazards are acknowledged in the analysis and the fire safety requirements included in the FPP. The project's fire protection system

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY ROBERT E. KEYSAK, DATED JANUARY 10, 2008

(CONTINUED)

Response to Comment D-2: (cont'd.)

includes a redundant layering of protection methods that have proven to reduce risk and mitigate impacts to a less than significant level. The combined fire protection system includes, but is not limited to, the following measures:

- An Evacuation and Fire Safety Plan (including buses and vans).
- A Shelter-in-Place (SIP) Facility, the multipurpose building, for use during wildfire emergencies if a safe evacuation is not feasible.
- Customized fuel modification zones around all structures with a minimum two times and up to 20 times the width of predicted flame lengths heights (minimum of 100 feet to a maximum of 330 feet).
- All structures will include ignition-resistant construction materials and interior sprinklers.
- Improved water availability and fire flow for the camp and throughout the Mussey Grade area from a 650,000-gallon public water tank (expandable to 800,000 gallons) to be constructed on site.
- Improved fire department access (i.e. internal road widening and paving).
- An on-site Fire Safety Coordinator who will work with RWMD Fire Services.

As stated above, secondary access is infeasible due to topographic, geological, environmental and economic constraints as described in Section 2.3, Hazards and Hazardous Materials of the EIR. In lieu of secondary access, the project will provide a shelter-in-place program to be used during a major wildfire if safe evacuation is not feasible. If a major wildfire were in close proximity to the camp and relocation is not feasible, the shelter-in-place strategy would be implemented as explained in following excerpts from the FPP (Section 6.2, page 44):

"Subject to input from Ramona Fire Department, Cal Fire, OES, or other fire officials involved in the Incident Command System, the following protocol will be followed at the camp:

The on-site fire safety coordinator will initiate relocation of the camp based on weather conditions, location of the wildfire, and Mussey Grade Road traffic conditions. Any wildfire in San Diego County will trigger a consideration for whether relocation is necessary.

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY ROBERT E. KEYSAK, DATED JANUARY 10, 2008 (CONTINUED)

Response to Comment D-2: (cont'd.)
Relocation will occur when it is determined that the wildfire is moving toward the Ramona area or when weather conditions indicate fire spread is likely (relative humidity of 20% or less, sustained winds of 35 mph or more and/or when the National Weather Service issues a Red Flag Warning) **AND** it can be confirmed that there is sufficient time for relocation.

Decisions regarding wildfire behavior and the time available before fire threatens the camp would be made by fire officials involved in the Incident Command. The on-site fire safety coordinator will communicate with Incident Command System for wildfire information.

If there are more than three hours available for relocation before the wildfire would threaten the camp, the on-site fire safety coordinator will implement relocation.

If there are between two and three hours available for relocation before the wildfire would threaten the camp, then the on-site fire safety coordinator will assess Mussey Grade Road conditions. If Mussey Grade Road is blocked or otherwise not flowing freely, then the shelter-in-place strategy would be implemented.

If there are fewer than two hours before wildfire may threaten the camp, there are 20 or fewer people on-site, Mussey Grade Road is open and flowing freely, and the local authority confirms relocation can proceed, relocation may be implemented.

Under all circumstances, if the on-site fire safety coordinator can not confirm with Incident Command how much time is available before a wildfire would threaten the camp, the on-site fire safety coordinator would implement the shelter-in-place strategy."

Furthermore, the hazardous conditions cited in the comment would be improved with implementation of the proposed shelter-in-place program because Mussey Grade area residents would be able to shelter- in-place at the camp if safe evacuation were not feasible.

Comment Letter D (cont'd.)

2. The necessity of bringing emergency vehicles and personnel DOWN the road during a major incident creates conflicting necessities as to fire protection and evacuation.

3. There is a distinct and present danger of road closure due to fallen trees and downed power lines which would render Mussey Grade Road useless as an evacuation route.

4. The number of residents on Mussey Grade Road in the Cedar Fire placed great pressure on the road as an evacuation route, and but for fate intervening, there might have been many deaths of residents down that road as they attempted to evacuate along this crowded and stalled route. It is mind boggling to consider that in the future, should the expansion of the camp be approved, there will be potentially hundreds of NEW individuals and vehicles attempting to vacate the area through this one fragile roadway during a major event.

D-2 (cont'd.)

There is certainly a reason that the fire code requires secondary access for projects such as this, and it is sleight of hand to assert that as designed the project will provide the "same practical effect" as a secondary access, specifically the shelter-in-place (SIP) if **relocation/evacuation is not possible.**

Those words are bolded for a reason. According to the Fire Protection Plan, specifically section 6.2, relocation/evacuation remains the primary response to a wildfire event. Shelter In Place (SIP) is an alternative to this primary response. Therefore, it is entirely likely that in the event of a wildfire in the area, all camp occupants AND THEIR VEHICLES will be exiting onto Mussey Grade Road, already in such an event crowded by evacuating residents. The experience of the 2007 Witch Creek Fire showed the results of a mass evacuation from the community of Ramona. The roads leading from the town and through the town were virtual parking lots. This is reminiscent of what Mussey Grade Road looked like during the Cedar Fire, a virtual parking lot. Overtaking flames would leap from stalled vehicle to vehicle, potentially killing all those within the vehicles. This would be the same result for buses which contained dozens and dozens of children from the Camp.

D-3

It is interesting to note that section 6.2 of the Fire Protection Plan pointed to the October 2007 wildfires as an example of a large number of people "successfully" evacuated by the reverse 911 system and a conservative trigger point for initiating the evacuations. Any one of the thousands of people evacuating Ramona during the October 2007 wildfires could relate stories of waiting 5-6 hours to evacuate the town. Hardly a shining example of a successful evacuation...

D-4

The Fire Protection Plan states that the project does not include feasible secondary access due to environmental, geological, ownership and financial considerations. Each of these reasons for foregoing a secondary access pale by far to a loss of life or lives as a result of increased pressure on the fragile sole egress from the area during a major wildfire event.

D-5

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY ROBERT E. KEYSAK, DATED JANUARY 10, 2008

(CONTINUED)

Response to Comment D-3:
The comment is correct in stating that relocation of the camp occupants will be the preferred option in the event of a wildfire. In response to this comment, the FPP has been revised to clarify the timing and process project site evacuation as explained in response to comment D-2.

The Fire Protection Plan specifically addresses the evacuation procedure in Section 6.1, "Salvation Army Emergency Response Procedures." According to that section, the preferred plan is early relocation, assuming that sufficient time is available to relocate visitors and staff from site without impacting Mussey Grade Road. Early relocation from the site to off-site areas via a conservative threshold is the preferred option, whenever possible, as determined by the Fire Safety Coordinator in consultation with the Incident Command.

The estimated time to relocate the maximum occupancy of 615 persons, at full build-out, is approximately 1 hour and 40 minutes. As stated in the FPP, this estimate is based on relocating up to 120 persons in two, 60-person buses at a rate of 25 minutes per trip, along with some people leaving the site in high occupancy vans and passenger cars. This estimate assumes that Mussey Grade Road is not blocked and that traffic is flowing freely. If the road were blocked or had substantial traffic, the shelter-in-place strategy would be implemented instead of relocating camp visitors.

The County concurs with the comment's description of the 2003 and 2007 mass evacuation of both the Mussey Grade area and of the community of Ramona; however, the County disagrees that the Proposed Project would further exacerbate this situation and would result in potential loss of life. Although the mass evacuations resulted in a "virtual parking lot" on the roads, the important point is that there was no loss of life during these evacuations. Despite the traffic congestion, area residents were evacuated safely. Moreover, the Salvation Army Camp successfully evacuated during both the Cedar Fire (2003) and the Witch Creek Fire (2007).

Response to Comment D-4:
The County acknowledges the conditions described in the comment. Although evacuation times varied significantly depending on the location and timing of evacuation order, the entire Ramona Community was successfully evacuated during the October 2007 wildfires with no loss of life. The occupants of the camp were evacuated well in advance of any danger from wildfires. Please refer to Response to Comments D-2 and D-3.

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY ROBERT E. KEYSAK, DATED JANUARY 10, 2008

(CONTINUED)

Response to Comment D-5:

Please see RDEIR responses to comments D-2 and D-3.

Comment
Letter D
(cont'd.)

Section 6.3 of the Fire Protection plan outlines the parameters of the Shelter-In Place option. The FPP seems to comfortably state that given the presence of leadership, the isolation of the camp, and residents and occupants who "readily accepts instruction" renders the Shelter In Place option will be a alternative to relocation/evacuation in the event relocation/evacuation is deemed impractical or dangerous. It is not certain that any of these presumptions shall prevail. There will be numerous private vehicles at the location. There will be no barriers or gates preventing occupants of the camp from fleeing during a wildfire event. Flight is a natural human characteristic which is not easily curbed. There can be no guarantee that even if a Shelter-In-Place call is made by the camp personnel, the occupants of the Camp will abide by this direction. A nightmare scenario would be for Camp occupants to flee in their private vehicles along an already congested sole evacuation road. The Shelter in Place option does NOT provide even a modicum of security against evacuation, even contrary to Camp personnel direction to the occupants. D-6

The Ramona Municipal Water District, as the agency responsible for fire protection in the project area, has on two separate occasions considered the issue of the expansion of the Salvation Army Camp and, in light of historic precedents and fully considering the option of Shelter-In-Place as an alternative to a secondary access, has determined formally that the Camp should not be expanded unless the expansion complies with requirements of a secondary access. The Ramona Municipal Water District does not believe that the new and untested Shelter-In-Place option will provide the guaranteed evacuation impact relief required when life hangs in the balance. Mussey Grade Road has been known by the parlance "tunnel of death." The addition of more bodies and vehicles along this fragile and easily impacted sole egress from the area, which must also operate as the sole ingress for emergency vehicles during a wildfire event, is too great a risk to take. D-7

Very truly yours,
RAMONA MUNICIPAL WATER DISTRICT

Robert E. Krysak
President – Board of Directors

CC VIA EMAIL: Joseph Farace, Planning Manager,
Advanced Planning Division, DPLU

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY ROBERT E. KEYSAK, DATED JANUARY 10, 2008

(CONTINUED)

Response to Comment D-6:
The County disagrees that the shelter-in-place plan is flawed due to unpredictable human behavior. Many California jurisdictions with wildland/urban interface areas such as Los Angeles, San Bernardino, Riverside and San Diego implement shelter-in-place design concepts in new subdivisions. In fact, Viejas Casino is a perfect example of a shelter-in-place program where the casino acted as a shelter for customers and neighboring residents during the 2003 Cedar Wildfire. Shelter-in-place is currently used in Los Alamos County in New Mexico, where new subdivisions are required to incorporate shelter-in-place design concepts. Pepperdine University in Malibu is another excellent example, where the school, in cooperation with the LA County Fire Department, has maintained buffer zones around the entire campus that have allowed the students to shelter-in-place on campus and survive three catastrophic wildfires (1985, 1993 and 1997). According to the Ventura County Fire Protection District's Fire Management Plan (July 2005), the shelter-in-place strategy was successfully used in the Ronald Reagan Presidential Library at Pepperdine University.

A more recent example of an effective shelter-in-place strategy occurred at Westmont College during the November 2008 Tea Fire in Montecito, California. The on-site gymnasium was effectively utilized as a shelter-in-place facility for about 800 students and faculty. Although the fire destroyed several structures on the campus, there were no reported injuries at the college during that wildfire.

According to the Westmont College website (http://www/westmont.edu/teafire/previous.html), the fire started just before 6:00 p.m. above campus and by 6:15 p.m., the college's Crisis Response Team had instructed students, faculty and staff to evacuate to the gym where they could be sheltered in place and protected from the fast moving flames. The website indicates that, "[the students] remained calm, ate a late-night snacks and spent part of the evening watching a movie."

Furthermore, the website states, "Westmont developed its crisis response plan years earlier in consultation with fire officials who recommended that students stay on campus in a protected building rather than flee in cars and be exposed to the dangers of a quickly burning fire. Although the flames came close to the gym, the students were safe inside, and the plan worked as expected."

The International Code Council (ICC) International Urban-Wildland Interface Code (Appendix G) identifies shelter-in-place as an option to address conflicts between wildland areas and development. The County's Wildfire Guidelines expand on the

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY ROBERT E. KEYSAK, DATED JANUARY 10, 2008

(CONTINUED)

Response to Comment D-6: (cont'd.)

code requirements and provide additional specificity and requirements that are currently absent from the ICC Code. See response to comment H-25.

Researchers from various universities also concur that shelter-in-place is a viable solution to address the threat of wildfires in the backcountry. (e.g. Wildland Fire & Fuels Management by Christopher A. Dicus, Ph.D., Natural Resources Management Department, California Polytechnic State University)

The County disagrees with the comment's assertion that campers will not follow instructions to shelter-in-place. As stated in the FPP, typically, an organized camp has a population that readily accepts instruction regarding safety rules, including fire requirements and the concept of shelter-in-place. Mandatory orientation is provided within the first 24 hours regarding fire threat, the alarm signal, and the appropriate actions to take when campers hear the alarm. Because the site is isolated, individuals are less likely to think they can "find their own way to safety" compared with a suburban or city setting and, thus, would more readily accept directions, including instructions to shelter-in-place. The FPP goes on to state that "to avoid the possibility that campers ignore shelter-in-place orders, the Salvation Army will institute the following protocol for all visitors to the site as means to enforce shelter-in-place when it is designated the safest alternative:

- Language will be added to contracts for groups who may rent facilities on the site indicating that during wildfire emergencies, licensed drivers may be precluded from their vehicles if shelter-in-place is required. The contract will include explanation that in the rare event that shelter-in-place is required; visitors will be safer in the multi-purpose room than attempting to evacuate the site.
- Educational material will be provided and thoroughly presented to visitors regarding the shelter-in-place capabilities of the multi-purpose room and the strict requirement that they follow directions in the event of emergency.
- In a wildfire emergency requiring shelter-in-place, camp staff will proactively gather individuals and direct them to the shelter-in-place site and away from parking areas."

Additionally, the site's Fire Safety Coordinator will work in coordination with RMWD Fire Services to train individuals to implement fire safety requirements at the shelter-in-place structures. Examples include window checks to ensure that open windows do not compromise the building's ignition resistance level and safe techniques for patrolling the grounds post-fire to identify and extinguish embers and secondary ignitions.

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY ROBERT E. KEYSAK, DATED JANUARY 10, 2008 (CONTINUED)

Response to Comment D-6: (cont'd.)
The FPP requires all components of the fire safety measures to be maintained. The RMWD Fire Services will conduct at least an annual inspection of the fuel modification zones, construction features, fire protection systems, and infrastructure to ensure that they meet the requirements specified in the FPP. Hence, the shelter-in-place system will be functional at all times.

Response to Comment D-7:
Comment noted. Please see RDEIR responses to comments D-1 through D-6.

Comment
Letter E

RAMONA MUNICIPAL WATER DISTRICT
105 Earlham Street
Ramona, California 92065-1599
Telephone:
(760) 789-1330

May 1, 2008 10022

Kristin Blackson
Department of Planning and Land Use
Project Processing Counter
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: **Response to Draft EIR; P70-379W2, LOG NO. 98-14-023; SCH NO. 2000031058; SALVATION ARMY DIVISIONAL CAMP AND RETREAT**

Dear Ms. Blackson,
Please find attached a copy of the Ramona Municipal Water District's comments to the Draft Environmental Impact Report for the abovementioned project.

If you have any questions please feel free to contact me at 760-788-2260.

Sincerely,

Phillip Dauben

Phillip Dauben, PE
Civil Engineer

RECEIVED
MAY 05 2008
DPLU - PPCC

Attachments
Cc: file

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Comment
Letter E
(cont'd.)

Ramona Municipal Water District's Comments to Salvation Army Draft EIR - April 2008

Universal Comment: The Water System evaluation completed by the Ramona Municipal Water District appears to have been completely ignored, misquoted, or taken out of context. The District requires a 1 million gallon storage tank to be constructed prior to providing any water service to the project. Our requirements may be found on page 6 in our evaluation attached to the EIR as Appendix K. A 300,000 gallons of storage is required for a 2 hour x 2500 gallon per minute fire flow. The entire DEIR needs to remove any reference to a 260,000 gallon storage tank and replace it with a 1-million gallon storage tank. E-1

Page	EIR Statement	RMWD Comment	
I-3	The fire protection system includes, but is not limited to, customized fuel modification zones; enhanced, ignition-resistant construction; a 260,000-gallon water tank and pipeline improvements; interior sprinklers; and other infrastructure improvements.	Change: 260,000-gallon to 1-million gallon	E-2
Figure I-1	28. Proposed 260,000 Gallon Water Tank	Change to: 28. Proposed 1-million Gallon Water Tank	E-2
Figure I-2	28. Proposed 260,000 Gallon Water Tank	Change to: 28. Proposed 1-million Gallon Water Tank	E-2
Figure I-3	28. Proposed 260,000 Gallon Water Tank	Change to: 28. Proposed 1-million Gallon Water Tank	E-2
Figure I-4	Proposed 260,000 Gallon Water Tank	Change to: Proposed 1-million Gallon Water Tank	E-2
Figure I-5	28. Proposed 260,000 Gallon Water Tank	Change to: 28. Proposed 1-million Gallon Water Tank	E-2
Table S-1	• The Ramona Fire Department determined that a 260,000-gallon water tank at an elevation of approximately 1,665 MSL with a ten-inch on-site water line that connects to the existing six-inch water main in Mussey Grade Road will meet fire flow requirements for the project and will also enhance the flow capacity to fight future fires in the project area. Prior issuance of building permits, the applicant shall submit to the County, plans approved by the Ramona Municipal Water District Engineering Department for a water system capable of handling the fire flow requirements for the project (existing and proposed buildings).	The Ramona Fire Department does not do the planning for the water facilities required by the water department. The engineering evaluation completed for the project requires 300,000 gallons of storage to meet the 2,500 gpm x 2 hour requirement. Another 600,000 gallons was requried for operational and emergency storage components of the tank. With a 100,000 gallon per day irrigation demand associated with the project, the developer's proposed tank size is grossly inadequate.	E-3
1-4	To increase fire fighting water capacity and flows, a new approximately 260,000-gallon water tank will be added near the existing 10,000-gallon water tank. A new private water line will connect with the existing six-inch water line in Mussey Grade Road at the main site entrance. The line will then transverse the property in private on-site roads located along the eastern property boundary within and bisecting areas proposed for development, terminating at the proposed 260,000-gallon water tank.	Change 260,000 gallons to 1-million gallons in two locations. Also note that there are two water mains required, an 8-inch and a 10-inch to and from the tank, respectively.	E-4

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RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY PHILLIP DAUBEN, PE, DATED MAY 1, 2008

Response to Comment E-1:

In response to this comment, the Applicant consulted further with the Ramona Municipal Water District (RMWD) with respect to the Water System evaluation previously prepared for the proposed camp expansion and the issues identified in RMWD's comment letter on the 2008 Revised Draft EIR. As a result of this consultation, the previous Water Systems Analysis (January 23, 2002) was updated and revised as necessary to reflect current modeling methodologies practiced by RMWD, revised water demand factors for the project, and updated current and planned land use information for the surrounding areas which the proposed water tank would serve. The updated and revised Water System Evaluation (RMWD, July 7, 2009) and RMWD correspondence dated July 14, 2009 and August 18, 2009 are included in the Final EIR as Appendix J. This evaluation indicates that the following public water facilities are required in order to provide water service to the proposed camp expansion:

- A new 8-inch main from Mussey Grade Road to feed the tank located on the Salvation Army Camp site (i.e., 8-inch dedicated tank fill line);
- A new 10-inch water distribution main, parallel to the new 8-inch main, to provide water service to the campground and connect back into the 6-inch main on Mussey Grade Road;
- A 650,000-gallon storage tank, with the capability to be expanded to 800,000 gallons, to be constructed within the RMWD's "Salvation Army Zone" which includes service to properties outside of the camp boundary.

The irrigation demand calculated for the project, as presented in the 2009 Water System Analysis, is 13,101 gallons per day. Total water demand for the camp is calculated at 56,901 gallons per day. The tank provides both fire protection and increased water pressure for fire fighting purposes for the campground, as well as other commercial, agricultural, and residential properties on Mussey Grade Road. The fire flow requirement for the project is 2,500 gallons per minute. Based on this required flow rate, the tank would provide a minimum of 300,000 gallons of water during a two-hour fire. Also, the elevation of the tank and proposed 10-inch distribution main will provide the required water pressure (73.4 pounds per square inch at an elevation of 1,280 feet) and flow rate (10.3 feet per second) to meet the 2,500-gallon per minute fire flow requirement.

Therefore, the tank size and requirements have been resolved. The Final EIR has been revised accordingly to reflect the updated Water System Evaluation and corresponding water facilities improvements required to service the project (see page 1-4).

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY PHILLIP DAUBEN, PE, DATED MAY 1, 2008 (CONTINUED)

Response to Comment E-1: (cont'd.)
The water infrastructure would be located in the overall development footprint/limits of disturbance of the project (e.g., see Final EIR Attachment A). The 650,000-gallon water storage tank would be located at the same site (i.e., within the same disturbance footprint) as the previously proposed 260,000-gallon tank. It will measure approximately 70 feet in diameter and 23 feet high. If the tank size is expanded to 800,000 gallons, the ultimate height of the tank would be 28 feet.

Response to Comment E-2:
Please see response to comment E-1.

Response to Comment E-3:
Please see response to comment E-1.

Response to Comment E-4:
Please see response to comment E-1.

Comment Letter E (cont'd.)

Page	EIR Statement	RMWD Comment	
1-4	In order for the Nature Study/Education Camp to be serviced by the Ramona fire department and the Ramona Municipal Water District (RMWD), a 10.8-acre parcel is proposed for annexation into the RMWD.	Just to note, to date, no action or deposits have been made to approach LAFCO for the parcel to annex into the RMWD. LAFCO however requires CEQA to be completed and thus no action may be necessary at this point.	E-5
1-6	A ten-inch diameter water main would also cross this drainage near the easterly project boundary. The main would be placed underground at a depth of three to five feet.	The report doesn't show the location of the proposed 8-inch, but we are assuming that it will be running parallel to the 10-inch and crossing the same drainage.	E-6
1-6	Additionally, a ten-inch diameter water main will be constructed beneath the road at a depth of three to five feet.	10-inch and 8-inch.	
1-10	In order to diminish potential fire emergency impacts, a 260,000-gallon water tank, 60 feet wide and 13 feet high, shall be located next to the existing 10,000-gallon tank in the central area of the project site to provide necessary water flow in the event of a fire emergency.	Revise Tank Size	E-7
Figure 1-4`	28. Proposed 260,000 Gallon Water Tank	Change to: 28. Proposed 1-million Gallon Water Tank	
1-39	Table 1-1 Project History	Table says that a 250,000 gallon tank was required in 2002, but Hydraulic Analysis completed by RMWD for the project in 2002 stated a 1-million gallon tank was recommended.	
2.3-6	Based on the 2002 study report, the RMWD established water system requirements for the campground. The requirements include a 260,000 gallon tank (expandable to one million gallons) at a base elevation of 1,665 feet. The tank will be connected to the existing main in Mussey Grade Road through two pipeline extensions in a five valve package. The water tank and all pipelines and appurtenances connecting to the main in Mussey Grade Road are to be public and, dedicated to the RMWD.	This is incorrect. The 2002 study report says, "The District recommends installation of a 1-million-gallon potable water storage tank at base elevation 1665 feet with an 8-inch pipeline extension from the Mussey Grade Road water main through the Salvation Army Campground to the tank, and a 10-inch pipeline extension from the tank back to the Mussey Grade Road water main. The two pipeline extensions should be connected to the Mussey Grade Road water main in a five-valve package to allow for operational flexibility"	E-8
2.3-7	On the hillside west of and above Area 2 the water main will connect to a the new 260,000-gallon water storage tank.	Revise Tank Size	E-9a
2.3-7	The proposed 260,000 gallon tank is larger than needed for the campground alone. In fact, the tank size is based on supplying both domestic and fire needs of all the existing properties in the 2,217-acre service area between the campground and the end of the line at Fernbrook Drive. This includes all properties within the RMWD boundaries along Mussey Grade Road	This is false. The 260,000 gallon tank does not even meet the 2002 fire flow requirements in the evaluation of 2500 gallons per minute for a period of 2 hours (300,000 gallons). The emergency storage and operational storage componenets of the proposed tank are not addressed.	E-9b

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RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY PHILLIP DAUBEN, PE, DATED MAY 1, 2008 (CONTINUED)

Response to Comment E-5:
Comment noted. Please see the response to LAFCO Letter (Letter F).

Response to Comment E-6:
Please see response to comment E-1.

Response to Comment E-7:
Please see response to comment E-1.

Response to Comment E-8:
Please see response to comment E-1.

Response to Comment E-9a:
Please see response to comment E-1.

Response to Comment E-9b:
Please see response to comment E-1.

Page	EIR Statement	RMWD Comment	
2.3-7	The 2002 study report prepared for the RMWD states as follows: Implementation of this recommendation improves the Mussey Grade Road community water distribution system in the following ways: 1. Dramatically improves the fire flow to the Mussey Grade Road fire hydrant locations; 2. Allows for greater operational and emergency water storage should pipeline breaks or shut-downs occur; and, 3. Eliminates the need for the Mussey Grade Pressure Reducing Valve.	This was said in the 2002 study about a 1-million gallon tank not a 260,000 gallon tank.	E-9c
2.3-7	The new water main, storage tank and appurtenances will be public - operated and maintained by the RMWD.	The RMWD will not accept dedication of any new facilities that are below current standards.	E-9d
2.3-15	Water system enhancements, including dramatically improved water availability (270,000 gallons), fire flow, water pressure throughout Mussey Grade Road and better access to fire hydrants throughout the Salvation Army site, will significantly improve the capability to fight fires on site and in the lower portion of Mussey Grade Road.	The water system enhancements do not meet current RMWD standards. Revise 270,000 gallon tank to 1-million gallons.	E-9e
2.3-20	The Ramona Fire Department determined that a 260,000-gallon water tank at an elevation of approximately 1,665 MSL with a ten-inch on-site water line that connects to the existing six-inch water main in Mussey Grade Road will meet fire flow requirements for the project and will also enhance the flow capacity to fight future fires in the project area. Prior to issuance of building permits, the applicant shall submit to the County, plans approved by the Ramona Municipal Water District Engineering Department for a water system capable of handling the fire flow requirements for the project (existing and proposed buildings).	The Ramona Fire Department does not do the planning for the water facilities required by the water department. The RMWD Engineering Department will not review or approve plans that do not conform to current standards.	E-9f
2.3-22	Water availability and flow would be improved with additional fire hydrants throughout the Camp and the 260,000-gallon water tank fed by the Ramona Municipal Water District.	Revise Tank Size	E-9g
2.7-1	In addition, the FPP requires water availability and flow would be improved with additional fire hydrants and water pipeline upgrades throughout the Camp, and a 260,000-gallon water tank fed by the Ramona Municipal Water District. The 260,000-gallon water tank would be placed near the existing 10,000-gallon water tank, which will remain in service.	Revise Tank Size	E-9h

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RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY PHILLIP DAUBEN, PE, DATED MAY 1, 2008 (CONTINUED)

Response to Comment E-9c:
The 650,000-gallon water tank (expandable to 800,000 gallons) would dramatically improve fire flow, and provide greater operational and storage capacity to the area. The currently proposed tank size is based on the 2009 Water System Evaluation prepared by RMWD. The Final EIR page 2.3-7 has been revised accordingly.

Response to Comment E-9d:
Comment noted. All currently proposed water facilities will meet RWMD standards and maintained by the RMWD.

Response to Comment E-9e:
Please see response to comment E-1 and E-9c.

Response to Comment E-9f:
Comment noted. Please see response to comment E-1.

Response to Comment E-9g:
Please see response to comment E-1. The Final EIR page 2.3-25 (previously page 2.3-22) has been revised accordingly.

Response to Comment E-9h:
Please see response to comment E-1. The Final EIR has been revised accordingly.

Page	EIR Statement	RMWD Comment	
9-4	The Ramona Fire Department determined that a 260,000-gallon water tank at an elevation of approximately 1,665 MSL with a ten-inch on-site water line that connects to the existing six-inch water main in Mussey Grade Road will meet fire flow requirements for the project and will also enhance the flow capacity to fight future fires in the project area. Prior to issuance of building permits, the applicant shall submit to the County, plans approved by the Ramona Municipal Water District Engineering Department for a water system capable of handling the fire flow requirements for the project (existing and proposed buildings).	The Ramona Fire Department does not do the planning for the water facilities required by the water department. The RMWD Engineering Department will not review or approve plans that do not conform to currents standards.	E-9i
9-5, 9-6	In addition, the FPP requires water availability and flow would be improved with additional fire hydrants and upgraded water lines throughout the Camp and a 260,000-gallon water tank fed by the Ramona Municipal Water District. The 260,000-gallon water tank would be placed near the existing 10,000-gallon water tank, which will remain in service.	Revise Tank Size	E-9j

Appendix B

6	To increase fire fighting water capacity and flows, a new approximately 250,000-gallon water tank would be added near the existing 10,000-gallon water tank. A new on-site private water line would connect with the existing 6-inch water line in Mussey Grade Road at the main entry to the Camp.	Revise Tank Size to 1-Million Gallons. Revise "A new on-site private water line" to read "There will be two onsite public water lines that..."	E-10
20	Impacts associated with installation of a waterline will be confined to within the existing onsite road area where the line runs under the road (Mike Matalon pers. com.). Outside of roadways, installation of the waterline would result in a 6-foot wide direct impact to native vegetation and oaks within 20 feet of the waterline's 6-foot wide direct impact were considered impacted (M. Johnson pers. com. from D. Dickman pers. com.).	Does not appear to address the impacts of both water mains. It is assumed that they will run parallel with eachother, but if not, other alignments need to be addressed.	

Appendix J

Page 11, Table 1	260,000-gallon public and 10,000-gallon private gravity tanks fed by and to surcharge the Ramona Municipal Water district water system	Revise 260,000-gallon tank to 1-million gallon	E-11

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RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY PHILLIP DAUBEN, PE, DATED MAY 1, 2008 (CONTINUED)

Response to Comment E-9i:
Comment noted. All currently proposed water facilities will meet standards required by the RMWD. The approved Water System Evaluation (Final EIR Appendix J) requires that water system improvement plans be approved by the Ramona Municipal Water District Engineering Department.

Response to Comment E-9j:
Please see response to comment E-1. The Final EIR has been revised accordingly.

Response to Comment E-10:
Please refer to response to comment E-1. An 8-inch water main from Mussey Grade Road will feed the tank located on the Salvation Army Camp site (i.e., 8-inch dedicated tank fill line), and a parallel 10-inch distribution main will provide water service to the campground and connect to the 6-inch main on Mussey Grade Road. The water tank and all pipelines are to be public facilities, dedicated to RMWD. The water infrastructure, including the proposed water mains, would be located in the overall development footprint/limits of disturbance of the project (e.g., see Final EIR, Attachment A); therefore, potential impacts associated with the water infrastructure have been adequately analyzed within the Final EIR.

Response to Comment E-11:
Please refer to response to comment E-1. EIR Appendix I (Fire Protection Plan) has been revised to reflect the updated water facilities based on the 2009 Water System Evaluation prepared by the RMWD. Fire flow requirements for the project are 2,500 gallons per minute (2009 County Consolidated Fire Code). The proposed water tank and associated facilities will provide a fire flow of 2,500 galloons per minute.

Comment
Letter E
(cont'd.)

Page	EIR Statement	RMWD Comment
Page 40	The water system is public and metered by the Ramona Municipal Water District. Appendix K includes a letter prepared by NASLAND Engineering (November 2007) describing the water availability and fire flow analysis conducted for this project. Also, results of the hydraulic analysis conducted by the Ramona Municipal Water District Department of Engineering referred to in the NASLAND letter of the water system in Mussey Grade Road are detailed in a January 23, 2002 Report (RMWD Project Number 10022-1. Based on that report, and as described in the NASLAND Engineering letter, The Ramona Water District's public water main in Mussey Grade Road is currently not adequate to effectively fight wildfire. As such, RMWD set and approved water system requirements for the campground expansion. Requirements include a 260,000 gallon tank connected to the existing main in Mussey Grade Road through two pipeline extensions in a five valve package. The water tank and all pipelines and appurtenances connecting to the main are to be public, dedicated to the RMWD. The water tank will be placed at an elevation of 1,665 feet AMSL (approximately 70 to 100 feet higher than the remainder of the camp near the existing 10,000-gallon tank, which will remain in service. The water will be delivered to the Salvation Army Camp buildings via a 10-inch main (private).	The January 23, 2002 Report referenced and attached to Appendix K of the DEIR do not set a requirement for a 260,000 gallon tank. A 1-million gallon tank is required that is fed by a dedicated 8-inch main and provide flow to the campground through a 10-inch distribution main.
Page 40	The proposed 260,000 gallon tank is larger than needed for the campground alone. In fact, the tank size is based on supplying both domestic and fire needs of all existing properties in the 2,217 acre service area between the campground and the end of the line at Fembrook. Thus, the residents of the Mussey Grade Road corridor will benefit from the improved water pressure, availability and fire flow.	This is false. The 260,000 gallon tank does not even meet the 2002 fire flow requirements in the evaluation of 2500 gallons per minute for a period of 2 hours (300,000 gallons). The emergency storage and operational storage componenets of the proposed tank are not addressed.

E-11
(cont'd.)

Comment Letter E (cont'd.)

Page	EIR Statement	RMWD Comment
Page 40, 41	The 2002 study report prepared for RMWD concluded that implementation of the water improvements associated with Salvation Army's project improves the Mussey Grade Road community water distribution system in several ways including: o Dramatically improves the fire flow to the Mussey Grade Road fire hydrant locations Salvation Army Divisional Camp Fire Protection Plan 5488 41 April 2008 o Allows for greater operational and emergency water storage should pipeline breaks or shut-downs occur o Eliminates the need for the Mussey Grade pressure reducing valve o Application of CBC fire flow calculations result in a 240,000-gallon requirement, assuming a Type III, 1-hour rated building, without applying the reduction available for an automatic fire sprinkler system. The code allows for up to a 75% reduction for sprinklers, subject to FAHJ approval.	This was not said by the RMWD in the 2002 for the water system proposed by the developer.
Page 41	Fire flow in the mains for residential occupancies shall be at least 2,000 gpm in fire mains with a 20 psi residual at periods of maximum peak domestic demand. Fire flow for the multifamily, resort, and commercial occupancies shall be a minimum of 2,500 gpm in fire mains and shall be per Fire Code Table A-III-A-1 with a 50% credit for sprinklers. Duration of flow shall be 2 hours or more if required by the table based on the required flow. The amount of stored water for fire protection shall be for the required duration (minimum 2 hours) at the worst-case fire flow at times of maximum peak domestic and commercial demand (including farming). In addition, fire protection water systems should comply with AWWA Standard M-31, "Distribution Requirements for Fire Protection."	The study completed by the RMWD in 2002 was based on a fire flow requirement of 2,500 GPM for 2 hours resulting in a fire storage compenent of 300,000 gallons. The operational and emergency storage components are in addition to the fire storage component has not been addressed in the DEIR.
	Prior to the issuance of building permits, the applicant shall submit to the County plans demonstrating a water system capable of handling the fire flow requirements – existing and proposed buildings (EIR page 2.3-4).	Revise to read, "Prior to the issuance of building permits, the applicant shall submit to the County and the Ramona Municipal Water District plans demonstrating a water system capable of handling the fire flow requirements – existing and proposed buildings (EIR page 2.3-4)."
Page 41	Fire service laterals, valves, and meters will be installed on site as required by the Fire Marshal.	Revise to read, "Fire service laterals, valves, and meters will be installed on site as required by the Fire Marshal and the current standards of the Ramona Municipal Water District".

E-11 (cont'd.)

E-12

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RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY PHILLIP DAUBEN, PE, DATED MAY 1, 2008 (CONTINUED)

Response to Comment E-12:
The County concurs with the comment. The Water System Evaluation (Final EIR Appendix J) requires, as a condition of project approval, plan check review by RMWD for on-site water system improvements.

Page	EIR Statement	RMWD Comment	
Page 51	Upgraded public water supply and fire flow exceeding requirements and providing for an improved water situation throughout the Mussey Grade Road area	Fire flow does not meet or exceed requirements.	E-13
Page 52	Water availability and flow would be improved with additional fire hydrants throughout the camp and the 260,000-gallon water tank fed by the Ramona Municipal Water District and to be dedicated to RMWD as a public system.	Revise 260,000 gallon tank to "1-million gallons"	
AFlamMap Fire Behavior Exhibit (Appendix E)	Proposed 260,000 gallon water tank.	Revise 260,000 gallon tank to "1-million gallons". (Typical of 2 locations)	
Project Avalability Form	Water availability form	Please note that Box B is checked that facilities to serve the project are reasonably expected to be available "based on water system evaluation completed for the project". If any other alternatives are proposed, they require an update to the evaluation. Also note that the RMWD had conditions attached to the availability form.	E-14
Letter from Nasland Engineering	Based on the 2002 report the RMWD has already set and approved water system requirements for the campground.	This is incorrect. The RMWD Engineering department completed a water system evaluation in 2002 for the project but has not approved any requirements for the project. Standards and Code changes occur and the developer will be required to conform to standards in effect until an application for water service has been made and accepted by the RMWD.	E-15
Letter from Nasland Engineering	The requirements include a 260,000 gallon tank (expandable to one million gallons) with a base level of 1665 feet.	This is not documented in the report completed by the RMWD Engineering Department.	E-16
Letter from Nasland Engineering	The proposed 260,000 gallon tank is larger than needed for the campground alone. In fact, the tank size is based on supplying both domestic and fire needs of all existing properties in the 2,217 acre service area between the campground and the end of the line at Fernbrook. This includes all properties within the District Boundaries along Musey Grade Road	Revise 260,000 gallon to 1-million gallon.	

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY PHILLIP DAUBEN, PE, DATED MAY 1, 2008 (CONTINUED)

Response to Comment E-13:
Please see response to comment E-1.

Response to Comment E-14:
Please see response to comment E-1. To the extent that conditions have been identified by the RMWD on the water service availability forms and the Water System Evaluation, these conditions have been identified in the EIR and will be included as conditions of approval in the Major Use Permit.

Response to Comment E-15:
Please see response to comment E-1.

Response to Comment E-16:
Please see response to comment E-1.

Comment Letter E (cont'd.)

Page	EIR Statement	RMWD Comment	
Letter from Nasland Engineering	The 2002 study report prepared for the RMWD states as follows: Implementation of this recommendation improves the Mussey Grade Road community water distribution system in the following ways: 1. Dramatically improves the fire flow to the Mussey Grade Road fire hydrant locations; 2. Allows for greater operational and emergency water storage should pipeline breaks or shut-downs occur; and, 3. Eliminates the need for the Mussey Grade Pressure Reducing Valve.	This was said in the 2002 study about a 1-million gallon tank not a 260,000 gallon tank.	E-16 (cont'd.)
Letter from Nasland Engineering	The new tank will thus improve the reliability of the water supply and allow much greater fire flow for all properties on Mussey Grade Road south of Dos Picos Park Road to the dead end.	This is true for a 1-million gallon tank.	

Appendix K

Project Avalability Form	Water availability form	Please note that Box B is checked that facilities to serve the project are reasonably expected to be available "based on water system evaluation completed for the project". If any other alternatives are proposed, they require an update to the evaluation. Also note that the RMWD had conditions attached to the availability form.	E-17
Letter Dated May 7, 2002	Letter to Mr. Joseph Farace County of San Diego, DPLU from Steven Delgadillo, RMWD Fire Marshall states: "Prior to issuance of building permits, a water system capable of handling the fire flow requirements associated with the existing and proposed buildings for this project shall be provided in the form of plans submitted ot the Ramona Municipal Water District Engineering Department for approval. It has been determined that a 260,000-gallon water tank at an elevation of approximately 1665 MSL in combination with a 10" on site water line to connect to the existing 6" water main in Mussey Grade Road will meet fire flow requirements. At that time, fire hydrant amounts and locations on site shall be established."	It should be noted that a tank sized for fireflow requirements only does not address potable, irrigation, emergency, and operational demands associated with sizing a tank. The engineering evaluation completed in 2002 addressed these other components and approval for a 260,000 gallon tank from the Ramona Fire Department does not constitute approval from the RMWD engineering department.	E-18

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RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, SIGNED BY PHILLIP DAUBEN, PE, DATED MAY 1, 2008 (CONTINUED)

Response to Comment E-17:
Please see response to comment E-14.

Response to Comment E-18:
Please see response to comment E-1.

Comment
Letter E
(cont'd.)

Page	EIR Statement	RMWD Comment
Page 6 of "Water System Analysis for the Salvation Army Campground " dated: January 23, 2002 and attached to Appendix K	Water Storage Tank Sizing Analysis The proposed water storage tank is sized for ultimate allowable build out of the Mussey Grade Road area south of the Salvation Army Campground. According to the District's Water Master Plan performed by Boyle Engineering in December 1998, tank sizing shall be based on the sum of the following demands for the area served: • 25% of the Maximum Daily Demand • One Average Day Demand • Fire Flow of 2,500 gpm for a 2-hour Duration The ultimate average daily demand for the Mussey Grade Road community south of the Salvation Army Campground was calculated to be 385,240 gallons per day. Utilizing the maximum daily to average daily demand peaking factor of 2.3, the maximum daily demand for the storage tank service area is 886,052 gallons, and 25% of the maximum daily demand is 221,513 gallons. A fire flow of 2,500 gallons per minute for a 2-hour duration comes to 300,000 gallons. Totaling the above maximum build-out demands for the storage tank service area, the tank should be sized for 906,753 gallons of water storage. 1 million gallons of water storage was utilized in the tank water cycle rate calculations as reported in the results in Table 1. For scenarios 7 and 8, the average daily demand water cycle rate was 9.2 days, based on current demands. While it is not commonly preferred to have storage tanks cycle water longer than 4 to 5 days, lowering the tank water levels can reduce the cycle rates in scenarios 7 and 8 during times of less water demand.	Please note that this is the tank sizing analysis completed by the RMWD.

E-18
(cont'd.)

Page	EIR Statement	RMWD Comment
Page 6 of "Water System Analysis for the Salvation Army Campground " dated: January 23, 2002 and attached to Appendix K	Recommendations The District recommends installation of a 1-million-gallon potable water storage tank at base elevation 1665 feet with an 8-inch pipeline extension from the Mussey Grade Road water main through the Salvation Army Campground to the tank, and a 10-inch pipeline extension from the tank back to the Mussey Grade Road water main. The two pipeline extensions should be connected to the Mussey Grade Road water main in a five-valve package to allow for operational flexibility. Implementation of this recommendation improves the Mussey Grade Road community water distribution system in the following ways: 1. Dramatically improves the fire flow to the Mussey Grade Road fire hydrant locations, 2. Allows for greater operational and emergency water storage should pipeline breaks or shut-downs occur, and 3. Eliminates the need for the Mussey Grade Pressure Reducing Valve since the tank elevation lowers pressures to the PRV location to approximately 180 psi.	Please note that these are the recommendations of the RMWD for water service to the project.

E-18
(cont'd.)

Comment
Letter F

LAFCO
San Diego Local Agency Formation Commission

1600 Pacific Highway • Room 452 • San Diego, CA 92101
(619) 531-5400 • FAX (619) 557-4190
Website: www.sdlafco.org

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Santa Fe
Irrigation District

Harry Mathis
Public Member

Brian Maienschein
Councilmember
City of San Diego

Executive Officer

Michael D. Ott

Counsel

William D. Smith

June 9, 2008

Kristin Blackson
County of San Diego
Department of Planning and Land Use
5201 Ruffin Rd., Suite B
San Diego, CA 92123-1666

SUBJECT: Notice of Availability of a recirculated draft Environmental Impact Report for Salvation Army Divisional Camp and Retreat (P70-379W, Log No. 98-14-023; SCH No. 2000031058)

Dear Ms. Blackson,

Thank you for allowing the San Diego LAFCO to provide comments on the above referenced project. LAFCO is responsible for encouraging the efficient provision of public services and has purview over changes to local government organization and any associated sphere of influence actions. Usually, LAFCO is a responsible agency for environmental review when jurisdictional changes and/or sphere amendments are proposed.

Within its discretionary review, LAFCO can only utilize environmental documents that contain a discussion of the ability of existing agencies to provide services, a description of existing infrastructure, how the project area is proposed to receive public services, and the associated jurisdictional, sphere of influence, and municipal service review changes. Therefore, we offer the following comments: F-1

- The revised draft EIR identifies the need for annexation to the Ramona Municipal Water District (MWD) of a 10.8-acre parcel for the provision of fire protection services. The subject territory proposed for annexation to Ramona MWD is comprised of portions of two parcels: Assessor Parcel Numbers (APN) 322-030-02 and 322-031-02. Any needed parcel boundary modifications for the subject territory will need to be completed prior to submittal of a jurisdictional change proposal to LAFCO.

RESPONSE TO COMMNET LETTER FROM SAN DIEGO LOCAL AGENCY FORMATION COMMISSION (LAFCO), SIGNED BY ROBERT BARRY, DATED JUNE 9, 2008

Response to Comment F-1:
The County concurs that LAFCO is a responsible Agency with respect to the proposed project. Specifically, the Final EIR, Section 1.3.1 Matrix of Project Approvals/Permits, identifies LAFCO as a Responsible Agency with respect to annexation of water service. The Final EIR provides an analysis of necessary public services to serve the project site on pages 6-2 through 6-3.

The County concurs with the comment that the 10.8-acre area that will require annexation to the Ramona Municipal Water District (RMWD) for fire protection purposes is comprised of two parcels. The Assessor Parcel Numbers (APNs) of the two parcels are 322-030-02 and 322-031-02. However, the project does not propose/require any parcel boundary modification for the subject territory.

Comment
Letter F
(cont'd.)

Notice of Availability of a recirculated draft Environmental Impact Report for Salvation Army Divisional Camp and Retreat (P70-379W, Log No. 98-14-023; SCH No. 2000031058)

The subject annexation territory is not within the Ramona MWD's adopted sphere of influence; therefore, an amendment to the District's sphere to include the subject territory is required prior to annexation consideration. The draft EIR should be corrected to reflect this requirement.

- As indicated in our previous correspondence, an expansion of the Ramona MWD service area boundary would also require concurrent expansion of the coterminous San Diego County Water Authority (CWA) and Metropolitan Water District of Southern California (MET) jurisdictional boundaries. The draft EIR should be corrected to reflect this requirement. F-2

- As a member agency of the CWA, the Ramona MWD would be responsible for obtaining CWA/MET conditional annexation approval prior to submittal of a jurisdictional change proposal to LAFCO. If CWA/MET conditional approval for annexation is not obtained, it would be necessary for the County to explore alternate options for the provision of fire protection services to the subject territory. F-3

Because the proposed project requires changes to local governmental organization and/or adopted spheres of influence, the San Diego LAFCO will be a responsible agency for environmental review. Accordingly, for LAFCO to use the revised EIR as a responsible agency, our comments need to be addressed satisfactorily in the final environmental document. Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (619) 531-5409. F-4

Sincerely,

ROBERT BARRY
Local Governmental Analyst

RB:tl

2

RESPONSE TO COMMNET LETTER FROM SAN DIEGO LOCAL AGENCY FORMATION COMMISSION (LAFCO), SIGNED BY ROBERT BARRY, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment F-2:
The County concurs with this comment, and the Final EIR has been revised to reflect the information provided by the comment. The potential actions identified by the comment, an amendment to the Ramona MWD Sphere, and concurrent annexation to the San Diego County Water Authority and the Metropolitan Water District have been added to EIR Section 1.3.1. The San Diego County Water Authority (CWA) and Metropolitan Water District (MET) are also identified as Responsible Agencies pursuant to CEQA Guideline §15381 within Section 1.3.1 of the EIR.

Response to Comment F-3:
Comment noted.

Response to Comment F-4:
The County agrees with, and acknowledges LAFCO's status as a Responsible Agency pursuant to CEQA Guideline §15381 as identified in EIR Section 1.3.1 Matrix of Project Approvals/Permits. The County concurs that, as a responsible agency, LAFCO would utilize the information contained in the EIR to support these actions.

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

EHL

May 10, 2008

Comment Letter G

Kristin Blackson
Dept. of Planning and Land Use
County of San Diego
5201 Ruffin Rd., Suite B
San Diego, CA 92123-1666

RE: P70-379W, Salvation Army Divisional Camp and Retreat, Recirculated DEIR

Dear Ms. Blackson:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the recirculated draft environmental impact report (DEIR) for this proposed Major Use Permit Modification. Overall, we concur that the Reduced Project Alternative as described in the document is an improvement, due to relocation of the retreat and the increase in biological open space.

We have the following comments on the recirculated document:

1. The Reduced Project Alternative still does not avoid BRCA to the maximum extent practicable.

While the Revised Open Space Configuration is much improved for reserve design (and no longer incorrectly relies on minimum mitigation ratios) it has "holes." Habitat outside of the limits of disturbance that is clearly of long term biological value due to contiguity with adjacent blocks of opens space remains excluded. Areas of potential additional open space are roughly outlined in red on the enclosed figure. After additional analysis and refinement by DPLU, all areas of BRCA with long term biological viability should be avoided and included in the biological open space. G-1

2. Loss of Diegan coastal sage scrub is not mitigated.

While over 13 acres of Diegan coastal sage scrub would be impacted, virtually no comparable habitat is preserved in the open space. While coastal sage-chaparral and coastal sage scrub are both "Tier II" habitats, the DEIR discloses that, "Areas mapped as coastal sage-chaparral scrub on-site contain predominately chaparral associated species with irregular sage scrub species presence." (2.2 Biological Resources) It is thus inappropriate to allow on-site crediting in this case. If the Diegan coastal sage scrub cannot be avoided and put into open space, off site mitigation should occur at a 1.5:1 ratio. G-2

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RESPONSE TO COMMENT LETTER FROM ENDANGERED HABITATS LEAGUE, SIGNED BY DAN SILVER, DATED MAY 10, 2008

Response to Comment G-1:
The circle on the map attached to the comment is the location of the existing cross area (including trail access area) at the top of the hill where camp related religious worship occurs. There is limited access in this area, but the trail will remain open as part of the project. Therefore, conditions would be the same as currently exist, and no impact would result from camp expansion. Other existing on-site trails have been included within the proposed open space easement as trails are an allowed use within open space; however, the cross and its associated benches are not specifically addressed by the BMO or MSCP as an allowed open space use and, thus, have been excluded from the open space to ensure continued availability to camp users for religious worship. Since the surrounding open space will be monitored to identify edge effects and no change from existing use of this area is anticipated, additional biological impacts are not anticipated.

The additional area identified on the map attached to the comment would not meet MSCP edge criteria; therefore, it was excluded from the proposed open space easement. As stated on Final EIR page I-3, in response to a comment submitted on the 2005 Draft EIR by the Endangered Habitats League (dated February 14, 2005), the project's previously proposed open space easement has been substantially increased and reconfigured. As previously proposed, the open space easement constituted 109 acres. As currently proposed, the open space easement covers 278.80 acres (395.57 acres under Reduced Project Alternative I), an increase of 286.57 acres of preserved lands. In order to comply with the County's Biological Mitigation Ordinance (BMO) Preserve Design Criteria (goals and criteria #4), the project's proposed open space easement has been revised to increase the amount of preserved area and decrease the amount of edge, and provide greater connectivity through the project site and with off-site preserve lands (thereby reducing non-preserve edge). The revised open space configuration creates large blocks of preserved habitat to reduce edge effects and to maximize the ratio of the area to the perimeter of conserved habitats, while providing connectivity with off-site preserved lands, ensuring compliance with the MSCP Preserve Design Criteria. The revised open space configuration maximizes the habitat structural diversity of conserved habitat areas. This revised easement configuration also conserves more habitat (299.89 acres more) than is required for habitat-based mitigation, resulting in a net preservation gain over development. No further revisions to the proposed open space easement are proposed in response to this comment.

Response to Comment G-2:
The County does not concur with this comment. As described on Final EIR page 2.2-26, "Although other areas of Diegan Coastal Sage Scrub or Coastal Sage-Chaparral Scrub could be added to the proposed open space in lieu of up-tiering to Mafic Southern

RESPONSE TO COMMENT LETTER FROM ENDANGERED HABITATS LEAGUE, SIGNED BY DAN SILVER, DATED MAY 10, 2008 (CONTINUED)

Response to Comment G-2: (cont'd.)
Mixed Chaparral, the areas are not preferable due to their location adjacent to proposed development, isolation due to existing disturbance, and/or disjointed location relative to the proposed open space easement. The Mafic Southern Mixed Chaparral has biological values and functions similar to Coastal Sage-Chaparral Scrub and would generally be used by the same composition of species."

To further clarify, due to small patch size and (regional) location, the on-site sage scrub does not support a significant number of sensitive sage scrub obligate species. The composition of animal species present is expected to use coastal sage-chaparral scrub and chaparral on-site, as well as sage scrub. Use and functionality of the habitat should be considered when assessing the appropriateness of mitigation from an ecological perspective. Since on-site sage scrub habitat function is similar to sage-chaparral scrub and supports fewer sensitive species than mafic chaparral, the project's proposal to use these communities as on-site mitigation would not result in a loss of ecological function or sensitive species support. Using off-site mitigation would be expected to result in a local loss of biological value on-site, as the preserved lands would be located away from the project site. Because there is no County-approved mitigation banking opportunity within the Mussey Grade area, the biological loss would occur there, but the biological gain would occur outside of the area. By preserving on-site lands, there is also a greater chance of open space management success as the existing interlinked biological functions of adjacent communities will be maintained over a greater portion of the site. If the mitigation obligation is shifted off-site, the management obligation shifts as well; thus, the result is less local mitigation/preserved land and an absence of management obligation, both of which could result in loss of local (spatial) biological and ecological functions and values.

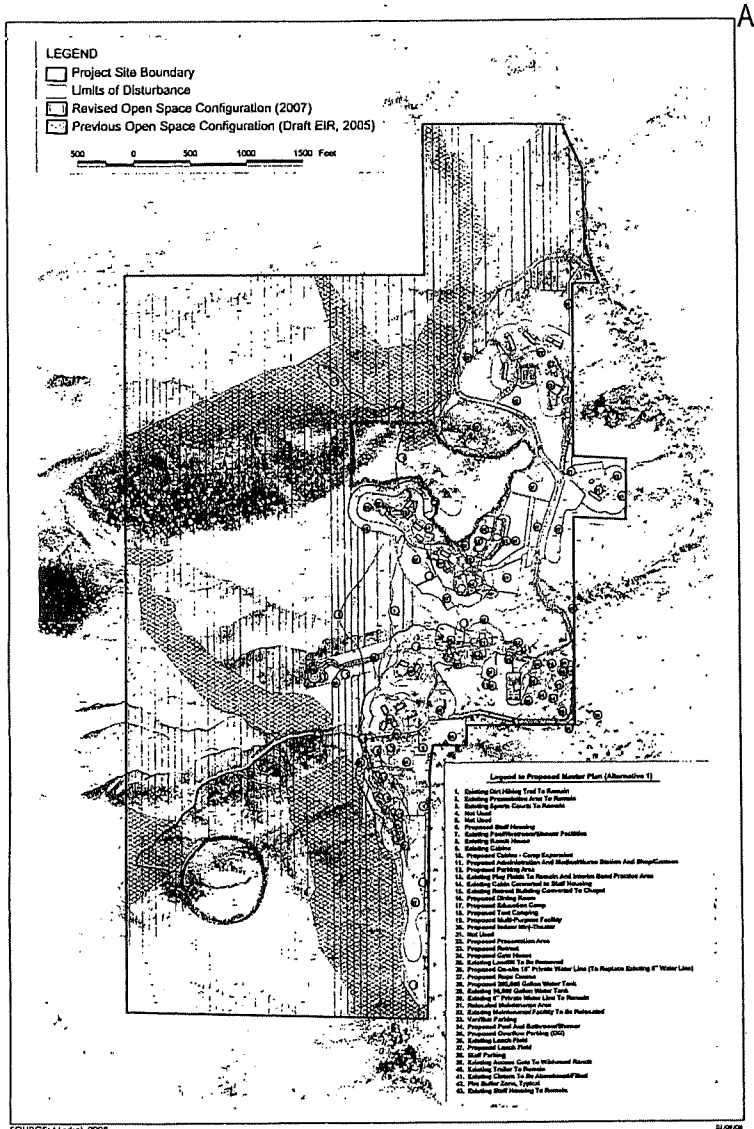
Thank you for considering our comments.

Sincerely,

Dan Silver
Executive Director

Enclosure

Letter G
Attachment



SOURCE: Merkel, 2008

Salvation Army Divisional Camp and Retreat

Openspace Configurations

FIGURE
I-2

Area for consideration as biological open space.

Procopio

Procopio, Cory, Hargreaves & Savitch LLP

Comment Letter H

Jeffrey R. Stoke
Direct Dial: (619) 515-3286
Internet: jrs@procopio.com

June 11, 2008

San Diego County
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666
Attn: Ms. Kristin Blackson

Re: Salvation Army Divisional Camp and Retreat
P70-379W² Log No. 98-14-023 SCH No. 2000031058

Dear Ms. Blackson and DPLU Staff:

The comments set forth in this letter are made on behalf of the McGuire Family Trust dated April 17, 1985 ("McGuire Family"), owner of an approximately 300 acre full-time family ranch adjacent to, and immediately east of the project site. This letter sets forth the McGuire Family's comments to the Revised Draft Environmental Impact Report dated April 2008 (the "RDEIR"), more particularly RDEIR Sections: 1.0 Project Description and Environmental Cumulative Impacts; 2.2 Biological Resources; 2.3 Hazards and Hazardous Materials; 2.7 Land Use/Planning; 3.0 Cumulative Impacts; 4.0 Project Alternatives; 6.0 Environmental Effects Found Not to be Significant; 9.0 List of Mitigation Measures and Environmental Design Considerations; Appendix B (Biological Report) and Appendix J (Fire Protection Plan). First, the McGuire Family seeks to have the RDEIR revised, and hazards analysis (including fire, traffic and safety reports) and environmental analysis (including biological reports) updated consistent with the comments set forth in this letter, and consistent with the comments of others. Second, the McGuire Family seeks to have the updated RDEIR recirculated for further comment. Third, the McGuire Family requests a fiscal impact analysis with respect to the proposed project. Finally, the McGuire Family requests that the Salvation Army submit an application for a new Major Use Permit (MUP), rather than an application to further modify County MUP P70-379 as previously modified by MUP P70-379W (collectively, the "Existing Permit"), since the granting of a new MUP is the only legal defensible basis upon which to process such a massive proposed change in facilities, population and operations at the Salvation Army site. H-1

Chapter 1 – Project Description, Location and Environmental Setting

A. References and Comparisons to Preferred Alternative. The Introduction to the RDEIR, Section 1.3, states that the Preferred Alternative (also referred to as the Preferred Project in the DEIR, the "Preferred Alternative") is no longer under consideration by the County of San H-2

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008

Response to Comment H-1:
The comment provides an introduction to the author and whom he is representing (McGuire Family). In addition, the comment provides a brief overview of what was reviewed by the comment and the major issues associated with his review. Please refer to the responses below.

Response to Comment H-2:
All references to the "Proposed Project" and to the "Preferred Alternative" have been revised throughout the Final EIR to read "Applicant's Preferred Project." The purpose of this change is to use a single term for the originally proposed project and to distinguish this proposal from the project that will be presented to the decision makers, Reduced Project Alternative I.

The 2005 DEIR assessed the potential environmental impacts of the Applicant's Preferred Project. The Applicant's Preferred Project would expand the camp and retreat facilities to accommodate a maximum of 748 users (DEIR Chapter 1 – Project Description, Location and Environmental Setting). However, the DEIR analysis identified significant and unmitigated impacts associated with the Applicant's Preferred Project related to conflicts with the MSCP (Biological Resources) and the General Plan Conservation Element (Land Use). Because there are alternatives to the Applicant's Preferred Project that can avoid these unmitigated impacts, one of these alternatives, Reduced Project Alternative I, will be presented to the decision makers for consideration (Final EIR pages 5-3, 4-6, and 4-9).

The shift in focus from the Applicant's Preferred Project to Reduced Project Alternative I is consistent with the DEIR (May 2005), Chapter S.5 which states, "... the Board of Supervisors shall certify the EIR and consider whether to approve the proposed project or one of the project alternatives." This approach is also consistent with CEQA, Public Resources Code Section 21002 which states, in part, "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."

A more detailed analysis of Reduced Project Alternative I was included in the RDEIR (April 2008) to allow the decision makers to consider Reduced Project Alternative I for approval. The purpose of providing a more detailed analysis of Reduced Project

San Diego County Department
of Planning and Land Use
June 11, 2008
Page 2

Diego or the Salvation Army because it cannot be approved. Therefore, the Preferred Alternative is no longer relevant to the RDEIR. As an infeasible alternative, all references to the Preferred Alternative as it relates to environmental analysis, or for comparative reasons, should be struck from the RDEIR. No decision maker should consider the Preferred Alternative in deciding whether to grant a further modification to the Exiting Permit. Multiple references in the RDEIR to the Preferred Alternative and to a reduction in scope of the Preferred Alternative to achieve Reduced Project Alternative #1 ("Project #1) appears to be a blatant attempt by the Salvation Army to unduly influence readers of the RDEIR to wrongly consider comparisons between the Preferred Alternative and Project #1. This is a false contrast, as the former Preferred Alternative is not feasible, and is no longer under consideration. All references to the Preferred Alternative should be struck from in the RDEIR. Similarly, all comparisons between the Preferred Alternative and Project #1 should be struck from the RDEIR, including all Figures and Tables (i.e., Tables 1-1, 4-1 and 4-2). H-2 (cont'd.)

B. Project Purpose. The Salvation Army needs to be honest about the purpose of its project, in order that decision makers can fairly consider Project #1 and its alternatives. Is the purpose of the project to expand the summer youth camp? Is the purpose of the project to transform the camp into a year-round, profit-generating, commercial conference center? If there is a dual purpose, then the project description in the RDEIR needs to specifically identify and quantify with detailed supporting data what portion of the project (camp only) is to serve youth, and what portion of the project (conference center) is a year-round, profit-generating, commercial enterprise. The RDEIR is void of adequate information to determine the sole purpose of Project #1, and similarly void of adequate information to determine the dual purpose of Project #1 on a proportionate basis of youth served versus adults served. The RDEIR needs to be corrected, supplemented and recirculated to provide the public with adequate information regarding either the separate or dual purposes of the Salvation Army's proposed modifications to the Existing Permit. H-3

C. Physical Characteristics of the Camp. Chapter 1, Section 1.0 of the RDEIR fails to adequately describe Project #1, and instead relies upon incorporation of the project description of the Preferred Alternative. This method appears to be purposefully confusing and misleading. An accurate, complete and finite project description is the *sine qua non* of an informative and legally sufficient EIR. *County of Inyo v. City of Los Angeles*, (3rd District 1977), 71 Cal. App 3rd 185, 193. Inclusion of project data for the Preferred Alternative (Chapter 1, Pages 1-1 through 1-17), outdated maps for the Preferred Alternative (Figures 1-4 through 1-15 on Pages 1-21 through 1-36) and project history leading to the Preferred Alternative (Table 1-1, Page 1-39) is unnecessary, improper and substantially confusing[1] to any decision maker reviewing elements of H-4

[1] The RDEIR is confusing with respect to the physical characteristics of Project #1. For example, *new* Chapter 1, Section 1.1.1 of the RDEIR provides that the Retreat Center for Project #1 excludes one 16-unit cabin and a gatehouse, and that Project #1 excludes tent camping (10 yurts), a restroom/shower building, outdoor seating and an

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-2: (cont'd.)
Alternative I was not to replace the analysis of Applicant's Preferred Project but to supplement the EIR so that the decision makers could consider this alternative for approval. Therefore, the Applicant's Preferred Project should remain in the EIR.

The RDEIR (April 2008) does not replace the Draft EIR (May 2005). The RDEIR (April 2008) and Draft EIR (May 2005) have been combined into one document - the Final EIR dated March 2010.

Response to Comment H-3:
The purpose and characteristics of the Applicant's Preferred Project were described in the DEIR (May 2005) and provided again in the RDEIR (April 2008). With the exception of the reduction in the number of users and area of disturbance under Reduced Project Alternative I, the characteristics of the project do not change. Please see DEIR responses to comments I-6, I-7, JI-1A, and JI-1B.

Response to Comment H-4 and Footnote 1:
The description for Reduced Project Alternative I (what the comment refers as Project #1) was included in the Alternatives Chapter 4.0 of the DEIR (May 2005) and RDEIR (April 2008). The County disagrees that the format of the RDEIR was "purposefully confusing and misleading." The Final EIR further clarifies the differences between the Applicant's Preferred Project and the Reduced Project Alternative I in Section 1.1.1. The Applicant's Preferred Project would result in a camp population at build-out of 748, Reduced Alternative I would result in a maximum camp population of 615 at full build-out and Reduced Alternative II would result in a maximum camp population of 513 at full build-out. Please see RDEIR response to comment H-2.

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Project #1 under the RDEIR. All project descriptions, Figures and Tables related to the Preferred Alternative which have been included in the RDEIR should be deleted, and replaced with a new detailed description of the *physical characteristics* of Project #1. H-4 (cont'd.)

D. Increase in Use; Change in Use. A fundamental purpose of an EIR is not only to allow decision makers to efficiently and effectively evaluate the *physical characteristics* of a proposed project, but to also quickly, efficiently and effectively evaluate any *increase in use* or *change in use* related to a proposed project. Unfortunately, with regard to the RDEIR, data pertaining to the *physical characteristics* of the existing camp is inadequate and sprinkled throughout the RDEIR in *old* Chapter 1 (Section 1.4.1) and Exhibit J (Section 2.4.1).[2] Similarly, with regard to the RDEIR, data pertaining to the *physical characteristics* of Project #1 increases in size, scope, intensity, scale, bulk, coverage and density of development is also inadequate and sprinkled throughout the RDEIR in the Introduction (Section 1.3), *new* Chapter 1 (Section 1.1.1), *old* Chapter 1 (Section 1.1.1) and Exhibit J (Section 2.4.2). Based upon limited available information in the RDEIR and FPP, it appears that the size/use of the Salvation Army site is proposed to increase from approximately 28,357 sq. ft. before the Cedar fire (2003) to approximately 215,000 sq. ft. at build-out, or a nearly *8-fold* increase. It is critical that the RDEIR sets forth in significant detail any *increase in use* and *change in use* from the existing camp to Project #1 because MUP compliance with County and local environmental, zoning and land use controls lies in the balance.[3] H-5

outdoor presentation area. However, by reference in the RDEIR to *old* Chapter 1, Section 1.1.1 of the DEIR, it appears that Project #1 includes all of the foregoing items, except by exclusion of these same project elements in various footnotes. The RDEIR is also confusing with respect to the maximum number of anticipated users of the camp. For example, *new* Chapter 1, Section 1.1.1 of the RDEIR provides that Project #1 will have a maximum user capacity of 615 people. However, by reference in the RDEIR to *old* Chapter 1, Section 1.1.1 of the DEIR, it appears that Project #1 allows for a maximum user capacity of 748 people, except by correction to 615 users in footnote 1. There is no similar correction to 615 users from 748 users in *old* Chapter 1, Section 1.1.1.1 of the DEIR.

[2] Although the RDEIR (Section 1.4.1) and Appendix J (Section 2.4.1) generally identify existing structures on the property, the RDEIR is void of details regarding the size, type and location of existing structures and recreational facilities necessary to allow decision makers to evaluate Project #1 increases in density, changes in use and compliance with the County's Zoning Ordinance (see discussion in Section 2.7 below). For example, RDEIR (Section 1.4.1) does not identify the size (in square feet) of the 5 masonry cabins, the 5 cabins for guest housing, the 6 yurts, the retreat center, or the dining hall. Hence, decision makers have no baseline for comparison in order to evaluate increases density between the existing camp and Project #1. Also for example, Appendix J (Section 2.4.1) states that the existing camp consists of 24.4 acres of "disturbed and urban areas," but does not provide a baseline of total building and total recreational facility areas within the existing camp, in order for decision makers to evaluate Project #1 increases in the total building and total recreational facility areas. See also Section 2.7-Land Use/Planning regarding minimum recreational areas.

[3] See discussion below regarding Project #1 non-compliance with County and local zoning and land use controls as more fully set forth in Section 2.7 – Land Use/Planning. Also, it is not clear from the description of Project #1 whether Project #1 includes triple redundancy for its septic system. The RDEIR must analyze the impact area of a

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-5:
The County disagrees that the project description is inadequate and does not evaluate the "increase in use" or "change in use" from the existing Major Use Permit. The County also disagrees that information about the physical characteristics of the existing camp are sprinkled throughout the document. Information regarding both the existing and proposed camp facilities is discussed throughout the document, but the existing and proposed facilities are described in Final EIR Chapter 1.0. Final EIR Section 1.4.1 describes the existing camp facilities. Final EIR Section 1.4.2 describes the operational characteristics of the existing camp.

The proposed facilities are described in Final EIR Section 1.1.1. The operational characteristics of the project are described in Final EIR Section 1.1.1.1.

A new figure Attachment A has been added to the Final EIR that depicts both the existing camp facilities and the proposed new facilities under Reduced Project Alternative I.

The following table provides a comparison of the facilities under the Applicant's Preferred Project and Reduced Project Alternatives I and II. This table has been added to the Final EIR as Table 1-2.

TABLE 1-2
Proposed Facilities

Facility	Number of Structures		
	Preferred Project	Alternative I	Alternative II
Cabin Camp	12	12	12
Tent Camp	10	0	0
Education Camp	10	10	7
Staff Housing and Chapel	11	11	11
Maintenance Facilities	2	2	2
Support Facilities	9	9	9
Retreat Facility	10	9	8
Recreation Facilities	1	1	1
Total Number of Buildings	**65**	**54**	**50**
***Total Building Square Footage**	**224,320**	**207,620**	**188,870**
Maximum Occupancy	**748**	**615**	**513**

Note: * All numbers are approximations

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-5: (cont'd.)
Seven structures were burned in the Cedar fire. All of those structures have been replaced.

Response to Footnote 2:
The County disagrees that the RDEIR (APRIL 2008) is "void of details regarding size, type and location of existing structures and facilities." In fact, Figure 1-4, Proposed Site Plan, notes both existing structures and proposed structures and facilities. However, the County agrees that the clarity of this Figure should be improved due to the small scale and lack of contrast between the proposed and existing structures. Therefore, this figure has been revised in the Final EIR (see Attachment A).

Response to Footnote 3:
Please see RDEIR response to comment H-43 for a response concerning local zoning and land use compliance. The septic system has been sized to accommodate a maximum of 748 persons. The area of disturbance associated with the septic system and septic fields would not change with Reduced Project Alternative I. The County Department of Environmental Health (DEH) has reviewed the septic system engineering for the project. The proposed septic system engineering includes the safety factors required for this use. The septic system would require a permit from DEH and would have to comply with applicable water quality regulations of the RWQCB. In a letter dated April 10, 2003, DEH stated it has "no objection to approval of the Major Use Permit modification" and has attached conditions for project approval. Furthermore, the letter states that DEH "has reviewed onsite wastewater system designs for a reduced version of the project. The reduced version has no impact on previously designed and approved onsite wastewater systems." The letter also states the basis for the recommendation was percolation testing, groundwater separation studies, soil character assessment and a nitrate discussion provided by Vinje and Middleton Engineering, Inc. (January 2003). In 2009, the DEH approved the septic plan (see letter dated December 21, 2009) and stated that DEH has "no objection to approval of the Major Use Permit Modification." The updated Vinje and Middleton Engineering, Inc. report (December 18, 2009) is provided as Appendix K to the Final EIR. As required by County Code section 68.341, a 100 percent reserve or expansion area (not 300 percent os osserted by the comment) is provided on-site.

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Comment Letter H (cont'd.)

It should not be up to governmental decision makers to guess at increased development density and increased coverage ratios presented by a proposed project. It should not be up to governmental decision makers to have to conjure up images of increased size, scale and bulk of a proposed project in relation to existing conditions. Finally, it should not be up to governmental decision makers to cull together missing and disjointed project data, in order to determine any *increase in use* or any *change in use* presented by a proposed project, and whether such *increase in use* or *change in use* complies with current environmental, zoning and land use controls. As applied to the Salvation Army property, the *change in use* is the "project" for CEQA purposes, and the failure to accurately describe existing conditions and Project #1 is a fatal flaw of the RDEIR which must be corrected and recirculated for meaningful public review and comment. H-5 (cont'd.)

Detailed *physical characteristics* of Project #1 including, without limitation, any *increase in use* and any *change in use* from the existing camp should be set forth affirmatively in *new* Chapter 1 (Section 1.1.1) of the RDEIR, and should be done in a manner to contrast the intensity, scope and types of uses under Project #1 versus the original (i.e., 1970) and currently existing (i.e., 2008) intensity, scope and types of uses on the property. For example: (i) a table should be added to *new* Chapter 1 of the RDEIR which compares the number, size (in square feet), maximum capacity and types of uses of original (i.e., 1970) and currently existing (i.e., 2008) buildings and amenities at the property, with the number, size (in square feet), maximum capacity and types of uses of proposed buildings and amenities under Project #1. Additionally, Figure 1-17 should be expanded in *new* Chapter 1 of the RDEIR to include an elevation comparison of existing cabins and Project #1 cabins, as well as an elevation comparison of the existing cabins and the Retreat Center, central dining facility (21,000 sq. ft.) and multi-purpose facility (19,500 sq. ft.). Finally, the Project #1 description should address elements, impacts and contingency plans for a triple-redundant septic system. More robust analysis, tables and figures in *new* Chapter 1 of the RDEIR will allow decision makers to more efficiently and effectively make comparisons of original, currently existing and Project #1 facilities, and to determine current and future project compliance with County and local environmental, zoning and land use controls.[4] H-6

E. Operating Characteristics of the Camp. In addition to a clear, concise comparison of the *physical characteristics* of the existing camp versus Project #1, the RDEIR should set forth a clear, concise and updated comparison of the *operating characteristics* of the existing H-7

triple-redundant septic system for a camp/retreat population of 615 people, including contingency plans if the septic system becomes inoperable. The RWCB has recently refused to grant approval for a similar-sized septic system in east San Diego County because of mineral constituents found in the groundwater which cannot be re-introduced into the septic system.

[4] The lack of a chart, table or detailed narrative in the RDEIR making comparisons between the existing camp and Project #1 implies that such a comparison would not be favorable to the Salvation Army.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-6 and Footnote 4:
The County disagrees that the EIR should be revised as suggested by the comment. Section 1.1.1 of the Final EIR describes the various components and operational characteristics of the Applicant's Preferred Project. Section 1.4.1 describes the existing camp facilities. Section 1.4.2 describes the operational characteristics of the existing camp. There is no requirement to describe the original camp as it existed in 1970. The baseline condition is the current condition of the camp as described on pages 1-15 through 1-17 of the Final EIR.

A chart of existing facilities and square footage and proposed facilities and square footage has been added to the Final EIR as Table 1-2.

As explained in Section 2.5.3 of the DEIR (May 2005), due to topography and vegetation, most of the project will not be visible from off-site locations. Those facilities that would be visible from off-site were analyzed in Section 2.5.3 of the DEIR (May 2005). The analysis includes architectural elevations of these proposed facilities. See Final EIR Figures 2.5-11 through 2.5-14. It is not necessary to revise Figure 1-17 because the architecture treatment of the proposed cabins has not changed from what was previously proposed under the Applicant's Preferred Project.

Figures 2.5-5, 2.5-7 and 2.5-8 provide visual simulations of existing conditions and proposed structures. Figures 2.5-11 through 2.5-14 are architectural elevations of several of the larger proposed buildings. The EIR concluded that there would be no significant impact in terms of aesthetics. The DEIR (May 2005), in Table 4-1, concluded that impacts to aesthetics would be avoided under Reduced Project Alternative I due to elimination of the access road to the retreat center. The architectural elevations are the same with either the Applicant's Preferred Project or Reduced Project Alternative I; therefore, an updated analysis is not necessary. The Draft EIR (May 2005) and RDEIR (April 2008) comprise the Final EIR.

Regarding the septic system, please refer to response to Footnote 3.

Response to Comment H-7:
Please see RDEIR response to comment H-3.

camp versus Project #1. Such a comparison (e.g., summer youth camp with non-summer retreat activities, versus year-round youth camp and/or conference activities) is fundamental to the ability of governmental decision makers to make findings regarding: (i) expanded "commercial" uses on the property, (ii) compliance of Project #1 with the County General Plan and the Ramona Community Plan, and (iii) compatibility of Project #1 with adjacent uses, residents, buildings or structures.[5] H-7 (cont'd.)

By relying upon *old* Chapter 1 of the DEIR for *operating characteristics* of the existing Salvation Army camp,[6] and by relying upon *old* Chapter 1 of the DEIR for *operating characteristics* of Project #1,[7] the RDEIR fails to provide adequate information regarding expanded "commercial" uses on the property. For example, *old* Chapter 1, Section 1.4.2 of the DEIR sets forth outdated information (i.e., 7-year old data) regarding the identity of organizations that used the camp for private retreats. No information is given in Section 1.4.2 of the DEIR regarding the number of retreat participants (including number of youth/adults per rental group), total revenues collected by the Salvation Army from private rental groups, the frequency and duration of stays of private rental groups, or other data supporting the Salvation Army's claims that the "primary" use of the camp is for summer youth activities (*old* Chapter 1, Section 1.4.2 of the DEIR). Similarly, neither *old* Chapter 1, Section 1.1.1.1 of the DEIR, nor *new* Chapter 1, Section 1.1.1 of the RDEIR, for purposes of analyzing Project #1 *operational characteristics* attempts to differentiate between Salvation Army and/or private group use of (i) the Retreat Center alone, and (ii) the entire site as a massive conference center. H-8

The description of Project #1 in *new* Chapter 1 of the RDEIR should be expanded to include a *new* Section 1.1.1.1 which describes in detail: (i) 2008 *operational characteristics* of the existing camp; and (ii) anticipated *operational characteristics* of Project #1 at full build-out including, without limitation: (1) youth summer camp population, (2) youth non-summer camp population, (3) Salvation Army's year-round use of the Retreat Center, (4) Salvation Army's H-9

[5] Section 7358(a) of the County Zoning Ordinance requires that the location, size, design and *operating characteristics* of the proposed use must be compatible with adjacent uses, residents, buildings, or structures while considering: (1) harmony in scale, bulk, coverage and density, (2) the availability of public facilities, services and utilities, (3) the harmful effect, if any, upon desirable neighborhood character, (4) the generation of traffic and the capacity and physical characteristics of surrounding streets, (5) the suitability of the site for the type and intensity of the proposed use, and (6) any other relevant impact of the proposed use.

[6] *Old* Chapter 1, Section 1.4.2 of the DEIR identifies *operating characteristics* of the existing project as follows: (i) youth summer camp generally operates from mid-June to mid-August (8 weeks) with a typical population of 165 people [115 youth, and 50 staff], and (ii) retreat activities generally operate during the balance of the year with a typical population of 90 people [85 retreat participants, and 5 staff].

[7] *Old* Chapter 1, Section 1.1.1.1 of the DEIR identifies *operating characteristics* of Project #1 as follows: (i) maximum capacity of the camp will be 748 persons, (ii) the primary use of the property will be for youth summer camp, and (iii) the Retreat Center will be available year-round for Salvation Army groups and private rentals.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Footnote 5:
The comment cites Section 7358(a) of the County Zoning Ordinance which requires Major Use Findings to be made in conjunction with the approval of a Major Use Permit. Pursuant to Zoning Ordinance Section 7378a, the same findings must be made for a Major Use Permit Modification. The County Department of Planning and Land Use staff will present these findings to the decision makers for consideration with the project. Since the comment does not assert how the project will or will not meet these findings, no further response is required.

Response to Comment H-8 and Footnotes 6 and 7:
The project is both a camp and a retreat center. The EIR analyzes the maximum capacity of this use at 748 persons (staff and guests) for the Applicant's Preferred Project and a maximum capacity under Reduced Project Alternative I at 615 persons. The primary use of the project is a camp for underprivileged and disadvantaged youth. Portions of the project include expanding the retreat facility to increase rental income and to provide retreat opportunities for other organizations. The EIR analyzes the physical impacts of the expanded retreat facility. The identity of the organizations or particular individuals that will use the facility is irrelevant under CEQA. The comment that the project is a "commercial venture" is incorrect. The project would be owned and operated by the Salvation Army, a charitable, non-profit organization. The project is not a for-profit, commercial venture. The project site is not zoned for commercial uses, and is tax exempt; therefore, the County would not receive property tax revenues from the project, which would otherwise occur if the project was a taxable commercial venture. Under the Applicant's Preferred Project, the maximum capacity of the site is 748. The maximum capacity number at any one time is the key number in determining the potential environmental impacts of the proposed project, rather the composition of that capacity (adults vs. children). The associated impact analysis would not change even if the proposed use were a commercial use.

The characteristic of retreat users (e.g. organizations that may use the retreat) has not changed between the time of the Draft EIR (May 2005) and the RDEIR (April 2008). Moreover, the comment fails to explain how different types of camp users are relevant to anticipated environmental impacts under CEQA.

Response to Comment H-9:
The County disagrees that the EIR should be revised pursuant to the comment. The Final EIR Section 1.4.2, Existing Operational Characteristics, describes the existing level and types of use of the project site. The Final EIR accurately describes the Applicant's Preferred Project characteristics including, future operation, maximum capacity and a site plan with the location of each facility. The Final EIR Section 1.1.1 describes each

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-9: (cont'd.)
component of the Applicant's Preferred Project, including proposed use, square footage, and maximum capacity. The maximum capacity of 748 users is composed of 523 youth campers, 175 retreat center guests, and 50 staff (see Final EIR pages 1-1 through 1-4). As stated in the Final EIR page 1-8, "irrespective if the composition of the camp, the maximum capacity of the camp at full build-out will be 748 persons under the Applicant's Preferred Project. The maximum capacity was calculated based on building capacity and tent accommodations and includes users, staff, and support personnel. The maximum capacity would be 615 persons under the Reduced Project Alternative I." Under the Applicant's Preferred Project, the maximum capacity of the project site at full build-out would be 748 people; however, the typical operating scenario is estimated to be 200-250 persons on the site at any given time. The scenario with 748 people was analyzed because it would be the worst-case scenario (full occupancy at full build-out).

Implementation of the Reduced Project Alternative I would result a reduction of 31 retreat users, 90 camp users, and 12 staff members for a total project capacity of 615 users at full build-out (Final EIR Section 4.3.1).

The EIR adequately analyzes the potential environmental impacts associated with the worst-case, maximum capacity of the site (i.e. 748 users), regardless of the camp the composition af those using the camp. Moreover, the comment fails to explain how different types of camp users are relevant to anticipated environmental impacts under CEQA.

year-round use of the camp (other than the Retreat Center), (4) private group rentals of the Retreat Center, (5) private group rentals of the camp (other than the Retreat Center), and (6) total annual rental revenue from private groups for each of the Retreat Center alone, the camp alone (other than the Retreat Center), and both the Retreat Center and camp. The foregoing data should be prepared in a manner to contrast 2008 *operating characteristics* of the property with anticipated *operating characteristics* under Project #1. H-9 (cont'd.)

F. Conditions of Approval to Further Modify the Existing Permit. Another fundamental purpose of an EIR is to allow government decision makers to efficiently and effectively determine what *conditions* will apply to discretionary land use approvals. Unfortunately, *conditions* of approval to further modifications of the Existing Permit are sprinkled throughout the RDEIR in *old* Chapter 1 (Section 1.1.1.2), *new* Chapter 2.3 and Exhibit J (Section 5). It should not be up to governmental decision makers to have to cull together disjointed information regarding *conditions* of approval. *New* Chapter 1 (Section 1.1.1.2) of the RDEIR should be revised to set forth a clear, concise and comprehensive list of recommended *conditions* for approval of Project #1, including all conditions of approval included in the FPP. H-10

Chapter 2.2 – Biological Resources

A. Biological Surveys are Inadequate and Outdated. Appendix B (Biological Report) to the RDEIR identifies that no meaningful species surveys have been conducted on the property in the last 5 years, or following major biological events related to the Cedar fire (2003) and the Witch fire (2007). As a result, the effect of significant changes in habitat on the property during the approximately 5-year period following the Cedar fire, and the potential changes in distribution of sensitive species in the region during the approximately 5-year period following the Cedar fire, remain absent from the biological analysis presented in the RDEIR. H-11

B. Effect of Fire Upon Wildlife and Habitat. Fire is often an instantaneous shock to its ecological setting. The habitat for some species is greatly improved, while the habitat for other species may be degraded, or eliminated. Of course, there are endless variations in between. Fire effects on wildlife and wildlife habitat revolve around succession theory. Fire event intervals play a significant role in these trends. Fire effects and their intervals cannot be ignored in any appropriate wildlife and wildlife habitat analysis. The two recent, significant regional landscape-changing fire events (i.e., Cedar and Witch fires) impact not only the habitat burned, but the regional distribution of wildlife surviving these fires. The impact of the Cedar and Witch fires on the surrounding habitat and wildlife dilutes the relevance of the species surveys conducted 3-4 years prior to the Cedar fire. Despite the project location as a major wildlife corridor and BRCA (Biological Resource Core Area), the project analysis currently ignores the Cedar and Witch fires, and their effects on the distribution of wildlife (including listed species) and the ability of such wildlife to continue to exist locally and regionally in light of the effects of the project. H-12

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-10:
The County disagrees with the comment. An EIR should discuss mitigation measures and project design features that are required to avoid or reduce potential project related impacts. Mitigation measures must be made enforceable through permit conditions or other means. The EIR includes project design features that are described as conditions of approval. All conditions of approval will be presented to the decision makers in the "Form of Decision." Therefore, the decision makers will not have to "cull together disjointed information" to find the proposed conditions of approval.

Response to Comment H-11:
Pursuant to CEQA, the baseline conditions for analysis of project impacts is typically set when the Notice of Preparation (NOP) is published (CEQA Guidelines, section 15125(a)). The NOP for this project was published March 16, 2000. Therefore, the environmental baseline for this EIR is the pre-fire conditions. County staff agrees with the comment that fire changes the biological resources present when the fire occurs. Eventually, however, the biological resources on-site recover to the pre-fire condition.

Furthermore, several biological investigations have been conducted on the project site subsequent to the Cedar Fire and Witch Creek Fire. A post-fire assessment was done in November 2003 to assess the vegetative damage and potential for recovery, an oak tree inventory in May 2006, and field reviews of County Jurisdictional Wetlands in June 2006 and July 2007 (see Table 1 of the Biological Report in Appendix B). In addition, an updated field survey was conducted in August 2009 to verify that the biological resources map previously prepared for the project site is still accurate.

The 2009 updated survey confirmed there have not been significant changes in the vegetation communities on the property since the previous mapping effort. Updated focused surveys for sensitive species were not conducted. However, the distribution of sensitive species was not observed to have changed from the distribution described in the RDEIR. The plant species composition of the vegetation communities on the project site was similar to or the same as the baseline conditions. Therefore, it is reasonable to expect wildlife species composition to be the similar to or the same as the composition that was previously documented. The Final EIR has been revised to include a discussion of the August 2009 survey.

Response to Comment H-12:
Please see RDEIR response to comment H-11.

Comment Letter H (cont'd.)

C. Further Analysis Required. To understand effect of the Cedar and Witch fires on wildlife and wildlife habitat, a series of questions must be asked. Addressing the overall effect of fire on wildlife and wildlife habitat for a given area that has burned is most easily approached by going from the general to the specific (e.g., by asking the following questions). The regionally proximate Witch fire four years after the Cedar fire complicates these questions: H-13

- What was the original successional stage and structural condition?
- What life forms or guilds were associated with those preburn conditions?
- What is the new successional stage and structural makeup?
- What life forms or guilds are favored by the new conditions?
- How were species of management or public interest affected?
- How may any obligate or otherwise sensitive species have been affected?

Once these questions are addressed, then the effect of Project #1 on these conditions can be appropriately addressed.

The scope of biological impacts from Project #1 is severely understated. Given the massive size of Project #1 and proposed fire evacuation plans, significant road improvements will be required along Mussey Grade Road, as well as the SR 67 intersection and corridor. There is no mention in the biological report that original and any updated biological analysis related to the Mussey Grade and SR 67 corridors will be impacted by Project #1 through roadway and related improvements, and significantly increased human and traffic activity. For example, Chapter 2, Section 2.3.1.6 of the RDEIR provides that vegetation/habitat will be cleared from the shoulder of Mussey Grade Road (up to 100 feet in open meadow areas) from the Salvation Army camp to SR 67, but the RDEIR contains no analysis of the biological impacts of such an activity.[8] Also for example, the RDEIR contains no assessment of impacts arising from either: (i) loss of wildlife habitat, or (ii) inhibition of wildlife movement, due to increased traffic on Mussey Grade Road from Project #1. H-14

Chapter 2.3 – Hazards and Hazardous Materials

A. Fire Hazards. Chapter 2.3, Section 2.3.1 of the RDEIR identifies that the project lies within a very high fire hazard area, and summarizes the fire history in the project vicinity. Chapter 2.3, Section 2.3.1 of RDEIR is inadequate and misleading in several important respects. H-15

1. Very High Fire Hazard Area. The RDEIR fails to identify that only 7% of all wildlands in the State of California are categorized as "very high" fire hazard areas, and that

[8] See also comments to Chapter 2, Section 2.3.2 of the RDEIR (Paragraph 8, subsection 7) identifying that Mussey Grade Road should have adequate vegetation clearance that may be as much as *twice* the calculated flame length.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-13:
Please see RDEIR response to comment H-11. The County requires biological surveys to document plants and animals occurring on the project site as they exist when the NOP is published, as required by CEQA Section 15125(a). Studying the effects of fire on wildlife and wildlife habitat is not required to evaluate impacts to biological resources from proposed development.

Response to Comment H-14:
The County does not concur with this comment. Significant road improvements are not required along Mussey Grade Road. The EIR does identify a cumulative traffic impact, requiring improvements to the SR-67/Dye Road/Highland Valley Road and SR-67/ Mussey Grade Road intersections. However, these improvements would not result in impacts to biological resources as the extent of the impact area is limited to existing disturbed and/or developed areas.

The comment referencing Section 2.1.3.6 is inaccurate. Section 2.1.3.6 does not refer to Mussey Grade Road. This section of the Final EIR states:

> "Defensible space at the camp site consists of the following:
>
> - Primary-access-road shoulder is mowed to the extent possible; including up to 100 feet in open meadow areas."

The primary-access road referred to in this section of the EIR means the on-site access road rather than Mussey Grade Road. The project impact area (or limits of disturbance) analyzed in the EIR includes all areas that will be impacted as a result of the project (including from vegetation clearing, grading, on-site road improvements, and infrastructure improvements).

The EIR determined that the increase in traffic resulting from the project would not result in significant direct impacts to traffic and circulation. Youth campers, who comprise the majority of camp users, are and will continue to be transported to and from the camp via bus or vanpool. In addition, the Retreat Center rental contract will recommend bus, van, or carpool as the mode of transportation for users. Furthermore, arrivals and departures (both for campers and retreat users) would not occur during peak commuter hours. As significant direct traffic impacts were not identified and off-site road improvements are not required, increased traffic would not result in additional loss of wildlife habitat beyond that addressed in the RDEIR (i.e., the limits of disturbance) and wildlife movement would not be inhibited.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-14: (cont'd.)
Currently, the Department of Public Works (DPW) conducts a roadside maintenance program for Mussey Grade Road which is separate from and not associated with the proposed project. The on-going program consists of vegetation removal (mowing) on an annual basis. Normally, this includes mowing an 8- to 10-foot-wide strip from the edge of the road, depending on right-of-way width and the adjacent terrain in the area. In addition, the roadside maintenance program includes the removal of trees within the right-of-way. The maintenance program is part of an effort to ensure good site visibility and a well maintained roadway edge.

Response to Footnote 8:
Currently, the Department of Public Works (DPW) conducts a roadside maintenance program for Mussey Grade Road which is separate from and not associated with proposed project. The maintenance program is part of an effort to ensure good site visibility and a well maintained roadway edge.

The comment regarding vegetation clearance along Mussey Grade Road is referencing a previous version of the County's Wildland Fire Guidelines (March 19, 2007). The 2007 version of the Guidelines included a provision that stated, "The primary access to the project must have vegetation clearance substantially greater than minimum code requirements, equal to at least twice the predicted flame length." The revised guidelines do not include this provision because this requirement was not supported by scientific evidence. Adherence to fire code requirements is sufficient to provide a safe and adequate primary access.

Response to Comment H-15:
As stated on page 2.3-1 of the RDEIR (April 2008), the site is identified as located in a very high fire hazard severity zone (VHFHZ). The comment fails to identify the source or document that describes the project site as "a uniquely hazardous area." The comment also fails to explain the relevance of that designation given the fact that the site is located in a VHFHZ.

Comment Letter H (cont'd.)

the Salvation Army site is located in a *uniquely hazardous* area. H-15 (cont'd.) The RDEIR also fails to disclose that Assembly Bill No. 2447 (Jones)[9] proposes to add Section 66474.02 to the Government Code which would mandate that all development approvals (i.e., tentative map or parcel map) for projects in a "very high" fire hazard zone (same as the Salvation Army site) must include findings that, among other things, there is adequate ingress and egress to/from the project, including a minimum of *two roads*[10] into and out of the project area for emergency equipment and evacuations. H-16 Finally, although Chapter 2.3, Section 2.3.1 (third paragraph) of the RDEIR states that extreme hazard conditions (i.e., 95 degree temperatures, 50 mph wind gusts, and humidity of less than 10%) have been assumed for fire behavior modeling; this statement is false, misleading and not supported by fire modeling data contained in the FPP.[11] H-17

2. Cedar Fire (2003). The Cedar fire was the #1 worst wildland fire in California.[12] It burned 273,000 acres (approximately 422 square miles), destroyed nearly 5,000 structures, and caused 15 fatalities and 91 injuries. It was a wind-driven Santa Ana fire with wind gusts of up to 55 mph (highest average speed of 29 mph). Within a 40-hour period, the Cedar fire burned over 5,000 acres/hour. At this rate, the entirety of the project area would be consumed with fire in less than seven (7) minutes. These facts need to be included in the RDEIR. The Cedar fire destroyed and/or severely damaged many of the buildings on the Salvation Army property, and there is little that will prevent history from eventually repeating itself. Yet, the Salvation Army now seeks to put the lives of 615 camp occupants, emergency personnel and project neighbors at risk. H-18

3. Witch Fire (2007). The Witch fire was the #3 worst wildland fire in California. It burned nearly 200,000 acres, destroyed 1,600 structures, and caused 2 fatalities. Similar to the Cedar fire, it was a wind-driven Santa Ana fire with wind gust of up to 60 mph (highest average speed of 30 mph). The RDEIR blatantly ignores the impacts of the Witch fire, and dismisses it on the basis that the Witch fire burned "well north and east of the project site, and did not reach the Mussey Grade area." In fact, however, the northerly portion of the Witch fire burned within approximately three (3) miles of the project site, and the southerly portion of H-19

[9] AB 2447 was passed by the Assembly in May 2008 (41-29 vote), and has been sent to the Senate for consideration. If passed by the Senate, decision makers must take AB 2447 into consideration when evaluating secondary emergency access to the project site.

[10] See the "Secondary Access" discussion below.

[11] Section 3.4.1 of the FPP indicates weather and wind input variables used in fire behavior analysis were not independently determined by Dudek, but based upon data utilized by the San Diego County Fire Marshal in his fire modeling efforts for the Salvation Army site. This input data includes wind speeds of 12, 18 and 24 mph which is a fraction of RDEIR findings of 50 mph wind gusts, and wind gusts of 55 mph reported during the Witch fire.

[12] The #1 worst wildland fire ranking is based upon number of structures destroyed according to the Cal Fire website http://www.fire.ca.gov/about/downloads/20LSTRUCTURES.pdf

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-16 and Footnote 9 and 10:
AB 2447 was vetoed by the Governor on September 30, 2008; therefore, the regulation is not applicable to this project.

Response to Comment H-17 and Footnote 11:
The County concurs with the comment that the RDEIR (April 2008) in Chapter 2.3.1 described the extreme hazard condition assumptions as using a 50 mph wind speed. It is acknowledged that the Fire Protection Plan (FPP) did not utilize the 50 mph assumption. To rectify the inconsistency, the EIR and the FPP have been revised to state: "...wind gusts of ~~50 mph~~ 12, 18 and 24 mph..."

Weather input values for fire behavior modeling runs performed in support of the FPP were derived from inputs used in preliminary BehavePlus runs conducted by County Fire Marshals. The 12, 18, and 24 mph wind speeds used in fire behavior modeling efforts originated from the Goose Valley RAWS (Remote Automated Weather Station), where 19 mph maximum sustained wind speeds and 41mph gusts were documented. The 19 mph and 41 mph maximum documented at Goose Valley were adjusted by a factor of 0.6 to account for vertical differences in wind speed from the 20-foot recording height to mid-flame height prior to BehavePlus modeling efforts. Standard RAWS setup places the anemometer at 20 feet above ground, while wind affecting surface fire spread is that found at mid-flame height. A conservative wind adjustment factor of 0.6 indicates a fuel bed that is unsheltered from the wind with a fuel bed depth greater than 2.7 feet. It should be noted that mid-flame wind speeds may be only 10% of the wind speeds recorded or predicted at 20 feet.

To evaluate the effects of higher wind speeds of 35 and 50 mph, observed in 2007 fires, additional BehavePlus runs were conducted. Using an adjustment factor of 0.6, 35 and 50 mph, wind speeds were adjusted to mid-flame speeds of 21 mph and 30 mph, respectively. Based on modeling results for fuel model SH7 (mixed chaparral), the maximum flame length for a 21 mph wind equals 42.3 feet, while that for a 30 mph wind equals 51.3 feet, representing the worst-case scenario on site: Proposed fuel modification zones of 175 feet in width adjacent to steep slopes covered with mixed chaparral vegetation are greater than 3 times the modeled flame length, assuming 30 mph wind speeds.

The Goose Valley RAWS is located at the Palomar Ranger District Office, 1634 Black Canyon Road in Ramona and is the closest weather station to the project site. While this site is north and east of the Salvation Army Camp, an analysis of Santa Ana winds events by National Weather Service wind model program (see FPP, page 18, Table 5) showed o strong correlation between Goose Valley and the Mussey Grade Road orea.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-17 and Footnote 11: (cont'd.)
Temperature and relative humidity readings are expected to be similar. Therefore, fire behavior predictions generated based on Goose Valley RAWS station wind data should apply to the project site.

The RAWS did not record wind gusts exceeding 50 mph during the 2007 fires. Therefore, the comment's reference to "actual conditions of 60 mph wind gusts" is incorrect. The BehavePlus modeling was based on actual wind data recorded during the 2007 fires.

Response to Comment H-18 and Footnote 12:
The County concurs with the comment's documentation of events. In fact, the RDEIR specifically states on page 2.3-2, "Fire history is an important component of fire protection planning. Fire history information can provide an understanding of fire frequency, fire type, most vulnerable project areas and significant ignition sources ..." Appendix C – Fire History Exhibit, provided in Appendix I (FPP) presents a fire history exhibit of the project site. The text of the EIR goes on to further describe how both the Cedar Fire and the Witch Creek Fire affected the project site and influenced the measures presented in the FPP.

If the project site were covered with natural vegetation, including substantial "dead material," and the extreme weather conditions that existed during the Cedar Fire occurred again, the entire project site could burn very quickly. However, the proposed project would substantially alter the existing fire conditions by including expansive fuel modification zones of 2 to 20 times calculated flame lengths and ignition resistant construction materials. These measures would substantially impede the ability of a wildfire to move through the project site quickly. The County agrees that the project site lies in an area designated as having a "very high fire hazard potential" by the California Department of Forestry (CALFIRE)(2007 proposed fire severity mapping)." As the comment asserts, the 2003 Cedar Fire burned through the Mussey Grade Road area and burned a portion of the Salvation Army Camp site, destroying several structures on the property, as noted in the project's FPP. The structures on the camp that burned in the Cedar Fire were old, were constructed of combustible material and had insufficient fuel modification zones around the buildings. The County disagrees that "the Salvation Army now seeks to put the lives of 615 campers, emergency personnel and project neighbors at risk." The FPP includes a redundant layer of protection methods that have proven to reduce risks due to wildfires. The proposed project would significantly increase fire safety compared to the existing site conditions and includes, but is not limited to, the following measures:

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-18 and Footnote 12: (cont'd.)

- An Evacuation and Fire Safety Plan (including buses and vans).
- A Shelter-in-Place (SIP) Facility, the multipurpose building, for use during wildfire emergencies to be used in the event that a safe evacuation is not feasible.
- Customized fuel modification zones around all structures with a minimum two times and up to 20 times the width of predicted flame lengths heights (minimum of 100 feet to a maximum of 330 feet).
- All structures will include ignition-resistant construction materials and interior sprinklers.
- Improved water availability and fire flow for the camp and throughout the Mussey Grade area by constructing a 650,000-gallon water tank on site (expandable to 800,000 gallon).
- Improved fire department access (i.e. internal road widening and paving).
- Employing a Fire Safety Coordinator to work with RWMD Fire Services.

These measures are a part of an extensive FPP that will be implemented if the proposed project is approved. The FPP measures will ensure that increasing the camp's population would not put 615 lives at risk.

Response to Comment H-19:
The County concurs with the comment's documentation of the 2007 Witch Creek Fire. In fact, the RDEIR specifically states on page 2.3-2, "Fire history is an important component of fire protection planning. Fire history information can provide an understanding of fire frequency, fire type, most vulnerable project areas and significant ignition sources ..." Appendix C – Fire History Exhibit, provided in Appendix I (FPP) presents a fire history exhibit of the project site. The text of the EIR goes on to further describe how both the Cedar Fire and the Witch Creek Fire affected the project site and influenced the measures presented in the FPP. Please also see RDEIR response to comment H-18. The County disagrees that the "impacts" of the Witch Creek Fire have been blatantly ignored. The project site's fire history, dating back to 1913 is described in the FPP. The EIR specifically states that the frequency of fires has increased and that wildfire hazards to the project are considered a significant impact. Consequently, mitigation measures are identified to address this impact.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-19: (cont'd.)
The Witch Creek Fire did not burn the project area, partly due to fuel reduction from the 2003 Cedar Fire. Similarly, customized fuel modification zones on the proposed project will create a large fuel break in the canyon that will slow the spread of fire and reduce fire intensity.

It is not clear what the comment means by requesting a fiscal impact of the Cedar and Witch fires. Under CEQA, an economic impact is not an impact on the physical environment that must be addressed in an EIR. See CEQA Guidelines section 15131.

However, the project will participate in a community facilities district (CFD). As stated on FFP page 13:

> "... the camp's participation in a community facilities district or CFD will fund ongoing monitoring by RFD staff or equivalent. The CFD will be a funding source for the ongoing Fire Department inspections of the Salvation Army fire protection systems. It will be formally established and will meet County/Ramona requirements for this type of service district."

Additionally, the proposed 650,000-gallon water tank (expandable to 800,000 gallons) on site would provide water supply and improve water pressure that would improve the fire fighting capabilities in the area over existing conditions.

the Witch fire burned within approximately ten (10) miles of the project site. These facts need to be included in the RDEIR, Within hours after the Witch fire started, 2 air tankers, 60 fire engines and 350 fire fighters were fighting the blaze (with another 1,000 firefighters in route to assist). The fiscal impacts of the Cedar fire and the Witch fire need to be included in the RDEIR. H-19 (cont'd.)

Moreover, while the project area landscape may have remained unchanged following the Witch fire, wildlife impacts (population, habitat and use) in the Mussey Grade corridor very likely changed due to wildlife use of the subject property and surrounding areas as a wildlife refuge and movement corridor, and these changes need to be assessed in the RDEIR. To dismiss the Witch fire as having no impact upon the project site is false and misleading, and alone constitutes a basis for rejecting the RDEIR for further corrections. H-20

4. Additional Egress. In Chapter 2, Section 2.3.1 (seventh paragraph) of the RDEIR, the Salvation Army added the following sentence: "There is *one primary point of access* with *one additional ingress route* available to the fire department." [Emphasis added] Nowhere in the RDEIR are two access roads identified, and the foregoing provision is considered to be false and misleading. The RDEIR should be revised to clearly state that there is only one (1) exceedingly dangerous access road serving the project site, and that during a fire emergency, a life-threatening choice must be made whether to (a) evacuate the property, or (b) allow fire-fighting equipment into the property. H-21

5. Acceptance of FPP by RMWD. Chapter 2, Section 2.3.1 (ninth paragraph) of the RDEIR provides that the FPP was approved by the RMWD Fire Marshal, Calvin McVay, in November 2007. However, the RDEIR provides no support for this false and misleading conclusion. In fact, an RMWD agenda dated November 13, 2007 bearing Mr. McVay's signature, entitled "Discussion and Possible Action" on the FPP evidences Mr. McVay's recommendation to the accept the FPP as: None. Furthermore, at its meeting on November 13, 2007, the RMWD refused to accept the FPP and instead wrote a scathing letter to the DPLU regarding the Salvation Army's failure to acknowledge the need for *secondary access* in the event of an emergency.[13] It is misleading for the RDEIR not to inform decision makers that the H-22

[13] The following are excerpts from the RMWD's letter to the DPLU dated December 19, 2007:

"The Board of Directors of the Ramona Municipal Water District, the Responsible Agency for fire protection services within the project area (Salvation Army Divisional Camp and Retreat), at its meeting of November 13, 2007, reaffirmed its previous position that a condition of approval of the expansion of the Salvation Army Camp be the acquisition and development of a secondary access for ingress to and egress from the Camp.

The Salvation Army Divisional Camp Conceptual Fire Protection Plan dated October 2007 failed completely to address the potential impact of the expanded camp and its inhabitants upon the sole ingress and egress routes not only to and from the project, but for hundreds of other individuals who reside along Mussey Grade Road, Ramona.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-20:
Please see RDEIR response to comment H-11 and IB-3.

Response to Comment H-21:
The comment is correct in identifying the discrepancy in the RDEIR (April 2008) regarding an additional ingress route available to the fire department. The Final EIR has been revised to remove the reference to this ingress/egress route. However, the RDEIR (April 2008) and the associated FPP did not include an alternative ingress/egress in the analysis of project impacts. Therefore, the County disagrees that the analysis in the EIR should be changed to reflect the comment's proposed language.

Response to Comment H-22 and Footnote 13:
The RDEIR (April 2008) on page 2.3-3 stated, "The FPP was reviewed, and accepted by the County of San Diego Fire Services Coordinator and by the RMWD Fire Marshal in November 2007." The RWMD Fire Marshal then presented the FPP to the RMWD Board for its consideration.

The RDEIR (April 2008) also acknowledged that RMWD rejected the FPP at that hearing on November 13, 2007. Page 2.3-14 of the RDEIR stated:

> "In a December 19, 2007 letter, the RMWD reaffirmed its previous position that a condition of approval of the expansion of the Salvation Army Camp be the acquisition and development of a secondary access for ingress and egress from the Camp."

Therefore, the information presented in this comment is not contrary to what was discussed in the FPP and the RDEIR (April 2008), and the RDEIR was not misleading.

Copies of the letters referenced in the comment are attached at the end of the responses to these comments. **(TG make sure these are attached)**

After the RDEIR was circulated for public review, the fire code regulations that apply to the project changed. On November 13, 2009, the 2009 Consolidated Fire Code became effective. Consolidated Fire Code section 96.1.4703 authorizes the County or the fire district to require a FPP "as part of the approval process." This section does not require the FPP to be approved by the fire district.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-22 and Footnote 13: (cont'd.)
Also, since the release of the RDEIR (April 2008), the Fire Protection Plan (FPP) was revised and submitted to RMWD Fire Services in November 2009. The RMWD Fire Services accepted the FPP on January 22, 2010 and the County Fire Code Specialist approved the FPP on February 2, 2010. The FPP includes justification for the approval of a modification for the project's failure to comply with the maximum dead-end road lengths (Section 5.2.1, pages 27 - 31).

RMWD has repeatedly required secondary access to the Salvation Army site. The RDEIR should be corrected to state fully and completely the RMWD's position on the Salvation Army's application, and include the RMWD's correspondence to the DPLU dated March 23, 2005 and December 19, 2007, as well as the RMWD's correspondence to the Salvation Army (with copy to the DPLU) dated February 28, 2007. All of these letters are highly critical of the Salvation Army's proposed expansion of the existing facility absent *secondary access*. H-22 (cont'd.)

6. Determination of Significance. Chapter 2, Section 2.3.2 of the RDEIR is inadequate because it sets forth only limited analysis of Appendix G of the CEQA Guidelines. While Impact 2.3b on Page 2.3-7 acknowledges a *significant impact* arising out of exposure of *increased visitors* to potential fire hazards, Impact 2.3b fails to analyze on-site exposure to *visitors* from Project #1 and off-site exposure to *neighbors* and *emergency response personnel* from Project #1. Additionally, Section 2.3.3 of the RDEIR is void of any analysis of increases in the potential for fire in areas with flammable vegetation from Project #1 (see bullet-point 3 on Page 2.3-5). Finally, the RDEIR is deceptive in its failure to disclose to decision makers the existence of newly adopted County of San Diego Guidelines for Determining Significance (the "Wildland Fire Guidelines") in regard to risks to people and structures arising out of wildland fires, and whether a proposed project has adequate emergency access. In regard to fire-related risks to people and structures, Section 3.0 of the Wildland Fire Guidelines identifies six (6) circumstances to be considered in determining whether a project presents such risks.[14] In regard to emergency access, Section 5.2 of the Wildland Fire Guidelines establishes the general premise that adequate ingress/egress to a project is critical to: (i) effective evacuation of residents from the site, and (ii) access to the site for incoming emergency personnel.[15] Thereafter, Section 5.2.1 of the Wildland Fire Guidelines identifies State and County laws which prohibit dead-end roads H-23 H-24 H-25 H-26

It is striking in its omission that the proposed Fire Protection Plan fails to address in even a cursory way the major issue raise by the Ramona Municipal Water District Board of Directors when it addressed this issue previously and made its earlier decision to mandate a secondary access to the project as condition of expansion."

[14] Section 3.0 of the Wildland Fire Guidelines provides that the following circumstances can result in increased fire related risks to people and structures: (1) projects located adjacent to and within the WUI and/or that incorporate large open space preserves within the project design; (2) high population and density in the WUI, (3) responses of people during a wildland fire event (human behavior), (4) emergency response services (fire stations, equipment and personnel) are inadequate to serve the project, (5) development projects that are built without ignition-resistive construction, interior fire sprinklers, and/or sufficient water supply (volume) and pressure; and (6) inadequate access, maintenance of landscaping restrictions, FMZs, and d periodic fuel management.

[15] Section 5.2 of the Wildland Fire Guidelines provides as follows: "Experience shows that developments with inadequate access (e.g. long roads with a single access point, roads over steep grades, improper road surfaces, and/or narrow roads) significantly contribute to the inability to effectively evacuate residents during a disaster (wildfire, earthquake or flood) or provide necessary emergency access for fire, ambulance, or law enforcement personnel.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-23:
The County disagrees that the EIR is inadequate in the analysis of impacts to surrounding neighbors and emergency personnel. The project will provide a shelter-in-place structure that will be constructed of ignition resistant materials, will include communication capabilities, and will be protected by fuel modification zones. This facility would accommodate up to 1,300 persons. Because this shelter-in-place structure would accommodate substantially more people than are expected onsite at any given time, it would be available to shelter local residents who may need a safe refuge from advancing wildfire (see FEIR, Section 2.3.3.) There are also two large open areas that would be available to emergency personnel and equipment, such as helicopters, and that could be used as staging areas or for other emergency purposes. In addition, the project includes a 650,000-gallon water tank (expandable to 800,000 gallons) which will dramatically improve fire fighting capabilities on the project site and surrounding area.

The requirements described in the FPP, including ignition ignition-resistant construction, fire protection systems, pre-planning, visitor education and training, and fuel modification/vegetation management, are designed to minimize risks from wildfires, such that camp staff, visitors and surrounding residents would be protected. These same features would also reduce the risk to emergency personnel. For example, the access roads would meet requirements for access by fire apparatus; therefore, emergency personnel could safely access the project site. The fuel modification zones would reduce the intensity and spread of fire on site, protect the buildings and provide areas where emergency personnel could stage operations. The shelter-in-place facility would provide a safe refuge for people at the camp (as well as area residents) so that emergency personnel would not have to attempt to reach the camp under unsafe conditions.

Response to Comment H-24:
The County disagrees with the comment. As stated on page 2.3-22, the purpose of the FPP is to require the construction of structures that are defensible from wildfire, and in turn, would not be a significant threat to ignite adjacent habitat. Due to the required fuel modification zones, use of ignition resistant construction materials, retrofitting of existing buildings and improvements to site infrastructure (roads and water supply), the wildfire risk from the project has been reduced compared to the existing site conditions even though the number of people visiting the site will be increased. In addition, Section 5.3.3 of the FPP, "Additional Requirements and Recommendations Based on Occupancy Type," requires several occupancy-specific measures to decrease the risk of starting a wildfire. The following is a partial list of those measures which limit the chance a fire would be ignited by camp occupants or that a fire may spread off-site:

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-24: (cont'd.)

- Smoking shall continue to be prohibited on site.
- The fire sprinkler system and valves shall be remotely supervised to an approved alarm company. The riser and valves will be located on the exterior or in a 1-hour rated room directly accessible from the exterior.
- The fire department sprinkler connection to be located at about 4 to 10 feet in from the curb of the main access road in front of the main building, 40 feet or more from building. A fire hydrant shall be located within 50 feet of the connection.
- A swimming pool fitted with a dry hydrant or diesel powered portable firefighting pump should be maintained for additional fire fighting water supply.
- Restaurants shall have the appropriate fire extinguishing systems where required for cooking operations.
- Smoke detectors shall be provided.
- Manual fire alarms should be provided.
- There shall be fire extinguishers as required by the Fire District.
- Any bus storage, maintenance, and fueling operations to comply with the District Fire Code and be approved by the Fire District.
- Proper storage and maintenance of on-site fuel propane tanks.

Response to Comment H-25 and Footnote 14:
The County disagrees that the EIR is deceptive. As a policy, Department of Planning and Land Use does not apply the guidelines to projects which were submitted prior to the approval date of the guidelines. The application for this project was submitted in 1998, and the guidelines referenced in the comment were adopted in 2007.

However, the EIR is consistent with the Section 3.0 of the Wildfire Guidelines, Typical Adverse Effects, to which the comment refers. This section describes, in general, the circumstances under which a project would result in increased fire related risks to people and structures. The RDEIR (April 2008) and the associated FPP identified those fire risks. Specifically, on page 2.3-1 the analysis states, "The Ramona Planning area, where the project site is located, experiences significant fire hazards due to its location within heavily vegetated foothills within a relatively dry climate, especially during summer months. The Salvation Army Divisional Camp property is located in a rural setting and is largely covered with highly flammable native and non-native vegetation.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-25 and Footnote 14: (cont'd.)
The project site lies within an area designated as having a very high fire hazard potential by the California Department of Forestry (CalFire) (2007 Proposed Fire Severity Mapping)..."

Response to Comment H-26, Footnote 15 and 16:
Please see RDEIR response to comment H-25. The County acknowledges that the proposed project exceeds the allowable dead-end road lengths described in the County's Wildfire Guidelines, Section 5.2. However, the Guidelines also allow shelter-in-place as an alternative design. The proposed project includes a Shelter-in-Place facility which meets each criterion in Guidelines Section 5.6 Design Strategy – Sheltering. Please see RDEIR response to comment H-28.

from exceeding certain lengths.[16] As applied to the Salvation Army site, the dead-end road from SR 67 to the terminus of the Salvation Army parking lot may not exceed 1,320 feet. However, the length of the dead-end road from SR 67 to the terminus of the Salvation Army parking lot is actually approximately 2.8 miles in length, or *12 times* the allowable length of a dead-end road according to both State and County regulations. Finally, the Wildland Fire Guidelines set forth safety standards to apply to any project served by a dead-end road which exceeds the maximum length allowed by law. The RDEIR needs to include detailed analysis of the Wildland Fire Guidelines. See Paragraph 8 below. H-26 (cont'd.)

7. RMWD Chief May Require Secondary Access. Sections 1.6 and 5.2.1.1 of the Wildland Fire Guidelines identify that the Fire Protection District (FPD) Chief (i.e., the RMWD Fire Chief) may require a secondary means of access to the project where the FPD Chief deems that such access is necessary for emergency operations and/or evacuation. See also County Fire Code Section 902.2.2.8. The RDEIR is inadequate because it fails to inform decision makers of, or attach as an exhibit, letters issued by the RMWD dated March 23, 2005 and December 19, 2007, which set forth the RWMD's requirement for secondary access onto Dos Picos Park Road or SR 67 (not onto Mussey Grade Road) in order to mitigate public safety impacts related to potential fires in the project area. The RDEIR must be corrected to address the RMWD's requirement for secondary access, and to attach copies of the RMWD's three (3) comment letters to the Salvation Army and DPLU. H-27

8. County Requirement for Secondary Access. Section 5.2.1.2 of the Wildland Fire Guidelines provides that when the maximum length of dead-end roads is exceeded, then all discretionary projects must satisfy the following requirements: (i) the primary road must be improved in order to provide sufficient access to the project during a fire which results in the same practical effect;[17] (ii) secondary access, unless secondary access for new communities is unattainable[18] and in such event a shelter-in-place design may be considered as a *last resort* design concept with evacuation of residents being the *preferred action*. In order for a shelter-in-place design to be considered, the following seven (7) requirements must be satisfied: H-28

[16] Section 5.2.1.1 of the Wildland Fire Guidelines cites: (i) California Code of Regulations, Title 14, Section 1273.09, and (ii) County Fire Code Section 902.2.2.8. As applied to A-70 zoning (lot size of 1-5 acres), dead-end roads may not exceed 1,320 feet (including dead-end roads accessed from dead-end roads).

[17] The requirement of same "practical effect" means that the road from SR 67 to the terminus of the parking lot on the Salvation Army site must be sufficiently wide, flat and in good condition so as to allow for concurrent evacuation of residents from the site, and entry to the site by emergency personnel.

[18] The RDEIR must set forth findings that: (i) the Salvation Army camp is a new community, and (ii) secondary access is unattainable due to topographical or geographical constraints.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-27:
The County disagrees that the EIR is inadequate because it fails to inform decision makers RMWD's requirement for secondary access. See RDEIR response to comment H-22 and footnote 13.

The Wildfire Guidelines do not apply to the project as explained in RDEIR response to comment H-25.

The County Fire Code no longer applies to the project. The 2009 Consolidated Fire Code applies.

Response to Comment H-28 and Footnote 17:
The comment references Guidelines which have since been revised. The Wildfire Guidelines were originally approved on March 19, 2007 however; they were revised on December 19, 2008. In particular, the Wildfire Guidelines were updated to (1) incorporate changes to the Fire Code and Building Code which were made in January 2008; (2) change California Department of Forestry (CDF) to CAL FIRE; (3) add and clarify standards for dead end roads; and, (4) to make minor editorial changes.

As stated in the preface to the County Guidelines for Determining Significance, the guidelines were developed to provide consistent and objective evaluation of significant environmental effects; however, the guidelines are not binding on any decision maker and are not to be substituted for the use of independent judgment to determine significance or evaluation of evidence in the record.

As a policy, Department of Planning and Land Use does not apply the guidelines to projects which were submitted prior to the approval date of the guidelines. The application for this project was submitted in 1998, and the guidelines referenced in the comment were adopted in 2007. However, the project meets the standards stated in revised 2008 Wildfire Guidelines, Section 5.6 Design Strategy – Sheltering as explained below.[1]

Section 5.6 of the Wildlfire Guidelines state, "Shelter-in-Place is an alternative design concept with relocation (evacuation) of residents to a safe location being the preferred action. All of the following minimum design standards must be implemented in order to qualify for consideration of a Shelter-in-Place concept:"

[1] Section 5.6 replaced the discussion previously under Section 5.2.1.2 SIP Strategy to which the comment refers.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-28 and Footnote 17: (cont'd.)

(1) **The primary access roadway must meet fire code requirements (in terms of width, paving, posting, etc.) and have no potential constraints or bottlenecks.**

The primary access road for this project is Mussey Grade Road (from HWY 67) and the on-site assess road that traverses the project site 1.3 miles to the existing parking lot area.

Mussey Grade Road meets fire code requirements in terms of width, paving and posting and is in the County Maintained Road System. Fire apparatus roads require improved width of 24 feet (section 96.1.503.2.1). Mussey Grade Road is a two-lane roadway. The total paved road width varies from 26 to 36 feet which exceeds the 24-foot minimum requirement. Therefore, the road does not have any potential constraints or bottlenecks. The Department of Public Works (DPW) conducts a roadside maintenance program for Mussey Grade Road that is part of an effort to ensure good site visibility and a well maintained roadway edge. Normally this includes mowing an 8'-10' strip from the edge of the road, depending on right-of-way width and terrain in the area. In addition, the roadside maintenance program includes the removal of trees, if needed, within the right-of-way.

The on-site access road will be conditioned to meet fire code requirements in terms of width, paving and posting. The road would not have potential constraints or bottlenecks. The on-site access road currently includes intermittent paving and compacted decomposed granite surface. The project will be required to provide a 30-foot fuel modification zone on each side of the road. All roads will be improved to meet the requirements of the Consolidated Fire Code and County Road Standards, including minimum 24-foot road widths except for ten short road width reductions (pinch-points). These pinch-points will be 19 to 21 feet wide to minimize impacts to biological resources (see Figure 1-4 RDEIR – April 2008 and DEIR – May 2005). Pursuant to the Consolidated Code section 96.1.503.2.1, "Upon approval of the fire code official, vertical clearances or road width may be reduced as long as the reduction does not impair access by fire apparatus." The road width reductions were included in the FPP that was approved by the RMWD Fire Marshal. This approval is provided in Appendix J of the FPP (see FPP Appendix I).

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-28 and Footnote 17: (cont'd.)

(2) **All structures within the entire proposed project, regardless of distance to property line or WUI area, must be built using Enhanced Ignition Resistant Construction (County Building Codes).**

Section 5.3.1 of the FPP describes in detail the project's "Ignition-Resistant Structural Requirements" and outlines ignition-resistant construction (for all structures) that will meet the requirements of the County Building Codes (Chapter 7A).

(3) **The project must be designed with adequate and properly managed Fuel Management Zones which may be as much as four times the calculated flame length, and properly maintained ornamental landscaping consistent with County's "Fire, Defensible Space and You..."**

The project incorporates fuel modification zones that were designed using FlamMap fire behavior modeling throughout the project area. Fuel modification zones vary between twice as wide up to 20 times as wide as the adjacent predicted flame lengths. Detailed specifications for maintenance of all ornamental plantings in fuel modification areas is provided in the FPP and is consistent with the County's "Fire, Defensible Space and You...". Plantings are restricted to the approved planting list and maintenance will occur on a year round basis. Funding will be provided to ensure that fuel modification zones will be inspected on at least an annual basis. Additionally, the Major Use Permit Modification will include on-going conditions as described in the FPP, to ensure that requirements for fuel modification zones will be implemented for the life of the project.

(4) **The developer provides evidence that resources exist to adequately and consistently enforce weed abatement/fuel management regulations for the life of the project (a funding mechanism must be implemented to ensure fire agency enforcement staffing in perpetuity).**

A CFD will be established to provide funding for the ongoing inspections of the camp's fire protection systems by RMWD. Additionally, as part of the Major Use Permit Modification, the project will contain on-going conditions as described in the FPP, to ensure the enforcement of fuel management requirements for the life of the project.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-28 and Footnote 17: (cont'd.)

(5) **The developer provides evidence that resources exist to provide substantial and effective annual public outreach to educate residents on fire safety and emergency response for the life of the project (a funding mechanism must be implemented to ensure fire agency enforcement and staffing in perpetuity).**

Pursuant to measures in the FPP and as a condition of the Major Use Permit Modification for the proposed project, the Salvation Army will implement the following protocol for all visitors to educate them about shelter-in-place: (1) Language will be added to contracts for groups who may rent facilities on the site indicating that during wildfire emergencies, licensed drivers may be precluded from using their vehicles if safe evacuation is not possible and shelter-in-place is required. The contract will include an explanation that in the rare event that shelter-in-place is required, visitors will be safer in the multi-purpose room than attempting to evacuate the site. (2) Education material will be provided and thoroughly presented to visitors regarding the shelter-in-place capabilities of the multi-purpose room and the strict requirement that they follow directions in the event of an emergency. (3) In a wildfire emergency requiring shelter-in-place, camp staff will proactively gather individuals and direct them to the shelter-in-place site and away from parking areas. (4) Implement the Fire Safety Plan which requires a fire drill to be conducted on the first day of every camp period and to conduct an annual Fire Drill exercise with the RFD.

To ensure that the special fire hazard reduction project features proposed for this project remain functional, the project will be conditioned to establish a CFD, or similar funding mechanism, which will fund ongoing monitoring of the camp's fire safety requirements by RWMD. The amount of funds would be set by the RWMD to cover their associated time and equipment costs. The funding related condition would be in effect for the life of the use permit modification, if approved.

(6) **The extent to which any flammable vegetation/habitat areas is proposed within a SIP development must be carefully studied and evaluated as part of the FPP.**

Fuel modification areas are designed to gradually reduce fire intensity (flammable vegetation/habitat areas) and flame lengths from advancing fire by placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of all structures and adjacent open space areas. The FPP analyzes in great detail the predicted flame lengths and each zone's

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-28 and Footnote 17: (cont'd.)

width and related planting densities and species. The fuel modification zones are also presented graphically in Appendix E of the FPP, and an Approved Plant List is provided in Appendix F.

The previous iteration of the Wildfire Guidelines (March 19, 2007) included an additional provision for the shelter-in-place strategy. The provision stated that "the primary access to the project must have vegetation clearance substantially greater than minimum code requirements, equal to at least twice the predicted flame length." The revised guidelines do not include this provision because the requirement that vegetation clearance be "*twice the predicted flame length*" was not supported by scientific evidence. The fuel modification zones required by the fire code requirements are sufficient.

Response to Footnote 18:
As discussed in RDEIR response to comment H-41, secondary access is infeasible because of topographical, geographical, environmental and economic constraints. The comment regarding a new community is no longer relevant. The Wildfire Guidelines as amended on December 19, 2008, no longer contain language regarding the "new community" or require findings related to a "new community."

Comment Letter H (cont'd.)

(1) The primary access roadway must meet minimum fire code requirements (in terms of width, paving, posting, etc.), and have potential constraints or bottlenecks on or off-site until it reaches two directions of egress from the area.

(2) All structures within the entire proposed project, regardless of distance to property line or WUI (wildland urban interface) area, must be built using Enhanced Ignition Resistant Construction (County Fire and Building Codes).

(3) The project must be designed with adequate and properly managed Fuel Modification Zones with may be as much as *four times* the calculated flame length, and properly maintained ornamental landscaping consistent with the County's "Fire, Defensible Space and You..." A funding mechanism must be implemented to ensure fire agency enforcement staffing in perpetuity.

(4) The developer provides evidence that resources exist to adequately and consistently enforce weed abatement regulations for the life of the project (a funding mechanism must be implemented to ensure fire agency enforcement staffing in perpetuity).

(5) The developer provides evidence that resources exist to provide substantial and effective annual public outreach to educate residents on fire safety and emergency response for the life of the project (a funding mechanism must be implemented to ensure fire agency public education staffing in perpetuity).

(6) The extent to which any flammable vegetation/habitat areas is proposed within a shelter-in-place development must be carefully studied and evaluated as part of the FPP.

(7) The primary access road must have adequate vegetation clearance that may be as much as *twice* the calculated flame length.

H-28 (cont'd.)

The RDEIR is inadequate because it fails to provide a professional study with regard to the condition of: (i) internal roads on the Salvation Army property from the parking lot to Mussey Grade Road, and (ii) Mussey Grade Road from the Salvation Army camp entrance to SR 67 (collectively, the "primary road"); for purposes of assisting decision makers to determine whether the primary road is adequate for the concurrent, dual purpose of: (i) evacuating from the Salvation Army camp its visitors, staff and neighbors; and (ii) allowing entry by emergency

H-29

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-29:
The County disagrees that the EIR is inadequate due to inadequate analysis of the (1) internal roads within the project site and (2) the primary road as defined by the Wildfire Guidelines (Mussey Grade Road from Hwy 67).

The on-site access road (internal roads) will be conditioned to meet fire code requirements in terms of width, paving and posting. The road would not have potential constraints or bottlenecks. The on-site access road currently includes intermittent paving and compacted decomposed granite surface. The project will be required to provide a 30-foot fuel modification zone on each side of the road. All roads will be improved to meet the requirements of the Consolidated Fire Code and County Road Standards, including minimum 24-foot road widths except for ten road width reductions (pinch-points). These pinch-points will be 19 to 21 feet wide to minimize impacts to biological resources (see Figure 1-4 RDEIR – April 2008 and DEIR – May 2005). Pursuant to the Consolidated Code section 96.1.503.2.1, "Upon approval of the fire code official, vertical clearances or road width may be reduced as long as the reduction does not impair access by fire apparatus." The road width reductions were included in the FPP that was approved by the RMWD Fire Marshal. This approval is provided in Appendix J of the FPP (see FPP Appendix I).

Mussey Grade Road meets fire code requirements in terms of width, paving and posting and is in the County Maintained Road System. Fire apparatus roads require improved width of 24 feet (section 96.1.503.2.1). Mussey Grade Road is a two lane roadway. The total paved road width varies from 26 to 36 feet which exceeds the 24-foot minimum requirement. Therefore, the road does not have any potential constraints or bottlenecks. The Department of Public Works (DPW) conducts a roadside maintenance program for Mussey Grade Road that is part of an effort to ensure good site visibility and a well maintained roadway edge. Normally this includes mowing an 8'-10' strip from the edge of the road, depending on right-of-way width and terrain in the area. In addition, the roadside maintenance program includes the removal of trees, if needed, within the right-of-way.

The remainder of the comment addresses the functioning of these roads in the "worst-case scenario" (e.g. evacuation of the camp via buses and 300 cars, neighboring evacuations along with emergency vehicles accessing the area). Please see RDEIR responses to comments D-2, D-3, and D-6.

Comment Letter H (cont'd.)

personnel, vehicles and heavy equipment to the Salvation Army camp. For example, no professional study has analyzed areas of the primary road which are narrow, steep, winding and which have little visibility in regard to passage at the same time, during a worst-case scenario wildfire, of: (a) Salvation Army buses and 300 cars exiting the property; (b) a variety of vehicles [cars, trucks, horse vans, etc.] belonging to neighbors and their visitors exiting the surrounding area; and (c) fire trucks, brush clearing equipment, water tankers and emergency vehicles seeking access to the project site. The RDEIR must be supplemented with professional data to allow decision makers to evaluate the condition of the primary road in a worst-case-scenario event. H-29 (cont'd.)

Additionally, the RDEIR should be supplemented with the Report of the RMWD Cedar Fire Ad Hoc Committee dated January 10, 2005 (the "Cedar Fire Report") which involves a first-hand account of conditions along Mussey Grade Road during the Cedar fire (2003), and extreme challenges faced by emergency response personnel to protect structures and lives along the Mussey Grade corridor during the Cedar fire. The Cedar Fire Report contains important information and valuable life safety recommendations that are overlooked by the RDEIR. Noteworthy to the proposed expansion of the Salvation Army site is the following comment on Page 30 of the Cedar Fire Report: "The impression from all agencies is that given the limited resources, *triage was spontaneously arranged* to apply the resources where they would do the most good. Mussey Grade Road, with all of its *inherent dangers and limitations* (known as the "*Tunnel of Death*"), was *consciously avoided* by source allocators during the Cedar Fire." [Emphasis Added] H-30

The RDEIR is also inadequate because it fails to provide professional studies with regard to the foregoing seven (7) requirements before a shelter-in-place plan may even be considered *as a last resort* for Project #1. For example, the primary road does not satisfy Requirement (1) above because: (a) the primary road does not meet minimum fire code requirements in terms of width, paving, posting, etc.; and (b) the primary road has several constraints, hazards and bottlenecks between the Salvation Army camp to SR 67. Also for example, Requirements (3) – (5) cannot be satisfied because there is no proof of funding resources for enforcement in perpetuity. Requirement (6) cannot be satisfied because there is no professional study of flammable vegetation/habitat areas on the project site. Finally, Requirement (7) cannot be satisfied because vegetation clearance on the primary road is not adequate in many areas, and is certainly not as much as twice the calculated flame length. The RDEIR must be supplemented with reputable data to allow decision makers to evaluate: (i) whether secondary access to the project site is *unattainable* (rather than time-consuming and expensive) due to topographical or geographical constraints;[19] and (ii) whether each of the seven (7) requirements can be satisfied and whether a shelter-in-place plan should be accepted as a *last resort* design criteria. H-31

[19] It should be noted that the standard of *unattainable* relates only to topography and geography, not economics.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-30:
The County disagrees that the EIR does not include the conclusions and lessons learned from the 2003 Cedar Fire. Although the "Cedar Fire Report" is not specifically included as a reference or appendix to the EIR, the conclusions of the fire report led the County to require a comprehensive FPP which includes a Shelter-in-Place program. The FPP would also reduce the risk to emergency personnel. For example, the access roads would meet requirements for access by fire apparatus; therefore, emergency personnel could safely access the project site. The fuel modification zones would reduce the intensity and spread of fire on site, protect the buildings and provide areas where emergency personnel could stage operations. The shelter-in-place facility would provide a safe refuge for people at the camp (as well as area residents) so that emergency personnel would not have to attempt to reach the camp under unsafe conditions. Therefore, implementing the shelter-in-place strategy during a major fire catastrophe as described in the comment should preclude the "extreme challenges faced by emergency response personnel." Moreover, the project would include a 650,000-gallon water tank (expandable to 800,000 gallons) that would significantly improve the fire fighting capabilities in the project area.

Response to Comment H-31 and Footnote 19:
Please see RDEIR responses to comments H-28 and H-29 and Footnote 18.

B. Fire Safety.

1. Fuel Modification Zones. Chapter 2, Section 2.3.3.1 of the RDEIR provides that the most common type of fire anticipated in the vicinity of the project area is a wind-driven fire from the *north/northeast* with flame lengths that can reach *over 45 feet*. As set forth elsewhere in this letter, the data input into BehavePlus and FlamMap models to determine flame lengths of a maximum of *45 feet* was based upon significantly understated wind speeds; thus RDEIR findings regarding flame length are seriously flawed and fundamentally misleading. Additionally, Chapter 2, Section 2.3.3.2 of the RDEIR provides that fuel modification zones are, at a minimum, *twice* as wide[20] as the predicted flame lengths and in some areas up to *20 times* as wide as the predicted flame lengths, but Section 2.3.3.2 of the RDEIR is completely void of any analysis regarding wind direction, Project #1 building locations, and the width of fuel modification zones in the path of anticipated wildland fires. For example, to claim that a portion of a fuel modification zone surrounding the project area is up to *20 times* as wide as the predicted flame lengths is misleading, if the fuel modification zone is not in the path of predictable wildland fires. In order for decision makers to evaluate: (i) the adequacy of fuel modification zones, and (ii) the shelter-in-place design as a *last resort* design concept; then Exhibit E to the FPP (depiction of fuel modification zones) must be revised to identify, among other things: (i) maximum flame length based upon actual conditions of 60 mph wind gusts, (ii) prevailing wind direction during Santa Ana conditions, (iii) footprint proposed building locations with occupant capacity, and (iv) fire risks related to interior roads[21] which may be cut-off during evacuation efforts and/or prevent emergency personnel and equipment from gaining access to the shelter-in-place facility. Additionally, in presenting data for decision makers to consider the shelter-in-place design as a *last resort* design concept, and in light of the fact that the shelter-in-place facility is exposed to wind-driven fire from the *north/northeast* (prevailing direction of Santa Ana winds), the RDEIR must address the ability of emergency personnel to reach the shelter-in-place facility (including fire risks related to off-site and on-site roads), as well as the likelihood of the shelter-in-place facility to be over-run by wind-driven flames, under a worst-case wildland fire scenario. H-32

2. Roads. Chapter 2, Section 2.3.3.2(C) of the RDEIR cites California Fire Code Section 902.2 which requires that all access roads shall be a minimum of *24 feet* in width. In fact, however, not all portions of the primary road (specifically including internal roads on the H-33

[20] Wildland Fire Guidelines require that for a shelter-in-place design strategy to be considered as a *last resort*, then the project must be designed with adequate and properly managed fuel modification zones which may be as much as *four times* the calculated flame length.

[21] It appears that fuel modification zones adjacent to internal roads are measured with the road in the middle, as opposed to measuring from the edge of the road outward. Thus, fuel modification zones adjacent to internal roads are approximately *one-half* of the stated width in relation to an oncoming wildland fire.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-32:

The County disagrees that the EIR's findings regarding flame length are flawed and misleading. Weather input values for fire behavior modeling runs performed in support of the FPP were derived from inputs used in preliminary BehavePlus runs conducted by County Fire Marshals. The 12, 18, and 24 mph wind speeds used in fire behavior modeling efforts originated from the Goose Valley RAWS (Remote Automated Weather Station), where 19 mph maximum sustained wind speeds and 41mph gusts were documented. The 19 mph and 41 mph maximum documented at Goose Valley were adjusted by a factor of 0.6 to account for vertical differences in wind speed from the 20 foot recording height to mid-flame height prior to BehavePlus modeling efforts. Standard RAWS setup places the anemometer at 20 feet above ground, while wind affecting surface fire spread is that found at mid-flame height. A conservative wind adjustment factor of 0.6 indicates a fuel bed that is unsheltered from the wind with a fuel bed depth greater than 2.7 feet. It should be noted that mid-flame wind speeds may be only 10% of the wind speeds recorded or predicted at 20 feet.

To evaluate the effects of higher wind speeds of 35 and 50 mph, observed in 2007 fires, additional BehavePlus runs were conducted. Using an adjustment factor of 0.6, 35 and 50 mph, wind speeds were adjusted to mid-flame speeds of 21 mph and 30 mph, respectively. Based on modeling results for fuel model SH7 (mixed chaparral), the maximum flame length for a 21 mph wind equals 42.3 feet, while that for a 30 mph wind equals 51.3 feet, representing the worst-case scenario on site. Proposed fuel modification zones of 175 feet in width adjacent to steep slopes covered with mixed chaparral vegetation are greater than 3 times the modeled flame length, assuming 30 mph wind speeds.

The RAWS did not record wind gusts exceeding 60 mph during the 2007 fires. Therefore, the comment's reference to "actual conditions of 60 mph wind gusts" is incorrect. The BehavePlus modeling was based on actual wind data recorded during the 2007 fires.

Prevailing wind direction during Santa Ana conditions

With regard to the adequacy of fuel modification zones during Santa Ana winds from the north/northeast, the FPP includes Section 3.5 On-Site Risk Assessment which explains "the most common type of fire anticipated in the vicinity of the project area is a wind-driven fire from the north/northeast during the fall (Santa Ana conditions)." Appendix E of the FPP shows that the largest fuel modification zones are northeast of the shelter-in-place, in the path of a wildfire driven by Santa Ana winds. The fuel modification zone around the shelter-in-place structure is 175 feet. Based on the BehavePlus modeling (including the revised modeling conducted in response to this comment), proposed

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-32: (cont'd.)
fuel modification zones of 175 feet in width adjacent to steep slopes covered with mixed chaparral vegetation are greater than 3 times the modeled flame length, assuming 30 mph wind speeds.

Footprint proposed building locations with occupants
The County disagrees that Appendix E of the FPP needs to be revised to show building footprints with occupancy capacity. Appendix E shows the footprint of each building and identifies the shelter-in-place facility. The maximum occupancy of the camp is 615 persons under Reduced Project Alternative I, and the shelter-in-place facility has a maximum capacity of 1,300 persons.

Fire risks related to interior roads
Please see RDEIR response to comment H-29 regarding the proposed conditions for the internal roads.

The on-site access road will be required to meet fire code requirements in terms of width, paving and posting and would have 30 feet of fuel modification on each side. The on-site access road has been reviewed and approved by the RFD Fire Marshal and the County Fire Marshal. The road requirements would keep the roads clear and passable; however, in the unlikely instance that campers could not get to the primary shelter-in-place structure (the multi-purpose building), other structures on-site could be used to shelter from the fire. All structures on the site will be constructed to the latest codes, including ignition resistant features and would include interior sprinklers. Older structures will be made safer by retrofitting with specific measures, such as vent protection and fire sprinklers. Fuel modification would occur throughout the site and would be at minimum 100 feet wide and range to 175 feet wide.

During a wildfire, emergency personnel may try to reach the shelter-in-place facility. As stated previously, the proposed fuel modification along the interior roads should be adequate to allow emergency personnel and equipment to utilize the roads during a wildfire. However, if emergency personnel cannot reach the shelter-in-place, the occupants in the shelter-in-place should still be safe. The primary shelter-in-place structure would include extended fuel modification zones up to 175 feet to the northeast, the side exposed to the wildlands. The FPP also requires ignition-resistant construction, interior sprinklers, and training on how to implement shelter-in-place during a wildfire.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-32: (cont'd.)
Additionally, the fire safety coordinator will work at the direction of the RFD's Fire Marshal to train individuals to implement fire safety requirements at the shelter structures. Examples include ensuring that all windows are closed and using safe techniques to patrol the grounds post-fire to identify and extinguish embers and secondary ignitions. The primary shelter-in-place structure will include the following amenities:

- Several large-panel televisions to track newscasts during a wildfire event
- Computers capable of tracking wildfire incident status and communication
- Back-up power – battery banks that are "float" maintained and/or supported by solar panels
- Second utility source or U.L. rated diesel generator
- Emergency preparedness kits to make brief shelter-in-place stay as comfortable as possible including medical related equipment (i.e. supplemental oxygen, pain relievers, inhalers, etc.)

Likelihood that shelter-in-place facility will be overcome by flames
The width of the proposed fuel modification zone around the proposed shelter-in-place facility is 175 feet, which is 3 times the predicted flame length. Moreover, the design of the shelter-in-place structure would be built with ignition resistant materials pursuant to County Building Code, Section 92.1.701A. The large fuel modification zone around the structure will prevent flames from reaching the building, and the ignition resistant construction material will prevent the embers from igniting the structure.

Response to Footnote 20:
This comment is acknowledged. The shelter-in-place design strategy includes adequate fuel modification zones as described in the FPP, pages 22 through 24.

Response to Footnote 21:
The comment is incorrect. The proposed fuel modification zones for internal roadways are 30 feet on either side of the roadway as described in the FPP, page 29 and in Appendix E (of the FPP).

Response to Comment H-33:
After the RDEIR was circulated for public review, the fire code regulations that apply to the project changed. On November 13, 2009, the 2009 Consolidated Fire Code became effective. Consolidated Fire Code section 96.1.503 sets forth the provisions for

Salvation Army property) comply with the mandatory *24 feet* in width.[22] The RDEIR attempts to side-step road width non-compliance by claiming that "the RMWD requested, and the County of San Diego granted an Exception to Road Standards *based on secondary access* (see Appendix J of the FPP)." [Emphasis Added] However, there is no authority cited in the RDEIR that the County of San Diego may grant an exception to road width non-compliance based upon a *last resort* exception to secondary access (i.e., shelter-in-place design concept). The RDEIR must be supplemented to specifically identify in a Table and on a map all areas of non-compliance, and cite appropriate jurisdiction and authority for the County of San Diego's purported grant of a *double-exception* in relation to non-complying road width. H-33 (cont'd.)

3. Emergency Planning. Chapter 2, Section 2.3.3.2(F) of the RDEIR claims that the typical Project #1 population from September – February will be around 200 persons; however, there is no prohibition against concurrent use of the Retreat Center and camp facility such that off-season populations swell to 615 people. As a result, the definition of Project #1 and the purpose of Project #1 (neither of which is sufficiently described in the RDEIR) is critical to emergency planning as applied to the Salvation Army, as well as to private groups renting all or a portion of the facility, and the project's neighbors. The RDEIR needs to be corrected to satisfy these shortcomings, so that decision makers can property evaluate emergency planning measures and proposed conditions to approval (see Chapter 2, Section 2.3.4 of the RDEIR). For example, Chapter 2, Section 2.3.3.2(F) of the RDEIR establishes that the Salvation Army will conduct fire drills on the first day of each camp period, and the Salvation Army will maintain two 60-person capacity buses (with drivers), or other equivalent vans or buses, on the property. However, the RDEIR clearly provides that no such mandatory emergency planning procedures or transportation will be binding upon private groups renting Project #1 facilities. The RDEIR is inadequate because it fails to analyze risks to Project #1 visitors, emergency personnel and neighbors arising out of private groups (a potential for 615 people) failing to comply with emergency procedures, evacuation plans or Project #1 rules and regulations. H-34

4. Relocation; Evacuation. Chapter 2, Section 2.3.3.2(G) of the RDEIR sets forth an evacuation plan for 640 people [sic], even though maximum capacity of Project #1 is limited to 615 people. The evacuation plan, predicting total evacuation in approximately 1 hour relies upon countless presumptions (which are impossible to predict) including, without limitation: (i) visitors will act rationally and in accordance with instructions; (ii) emergency evacuation vehicles will perform perfectly; (iii) road conditions will be normal; (iv) buses and other evacuation vehicles will be able to make multiple round-trips without being delayed; (v) camp staff and law enforcement personnel will have advance notice of oncoming wildland fires, and will remain in continuous communication; (vi) evacuation efforts will not meet any H-35

[22] The number, location, length and nature of current road width non-compliance is not known because there is no professional report quantifying the same. The RDEIR must be supplemented with a professional study regarding non-complying road widths applicable to Project #1.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-33: (cont'd.)
fire apparatus access roads. Generally, these roads must have "an unobstructed improved width of not less than 24-feet" (section 96.1.503.2.1). The internal road for the project (from parking lot to Mussey Grade Road) will be improved and widened to 24 feet, except for certain sections of the road which will be 19 to 21 feet wide to minimize impacts to sensitive biological resources. Section 96.1.503 states "the fire code official may modify the requirements of the requirements of this section if the modification provides equivalent access." For this project, the "fire code official" is the RWMD Fire Services. The road width reductions were included in the FPP that was approved by the RMWD Fire Marshal. This approval is provided in Appendix J of the FPP (see FPP Appendix I).

The quote from the RDEIR regarding the County granting an exception to road standards has been revised in the Final EIR on page 2.3-11 to read as follows:

"Section 96.1.503.2.1 specifies minimum road width of 24 feet. The fire code official may approve a reduced road width if the reduction does not impair access by fire apparatus. The road width reductions were included in the FPP that was approved by the Ramona Municipal Water District Fire Marshal. This approval is provided in Appendix J of the FPP (see EIR Appendix I)."

Please see RDEIR response to comment H-28 regarding how the internal roads comply with the Wildfire Guidelines.

Response to Footnote 22:
The internal road for the project (from parking lot to Mussey Grade Road) will be improved and widened to 24 feet, except that certain sections of the road will be only 19 to 21 feet wide to minimize impacts to biological resources. The County disagrees that the EIR should be revised to contain a professional report that discusses non-complying road widths. In fact, Figure 1-4, contained in both the DEIR (May 2005) and RDEIR (April 2008) depicts the segments where the road narrows to avoid impacts to biological resources. See also revised Attachment A in the Final EIR. No further report is necessary. Please also see RDEIR response to comment H-29.

Response to Comment H-34:
The emergency planning for the proposed project is based on maximum on-site occupancy of 615 persons. The assumption that camp population from September to February (typical fire season) would be 200 persons is based on existing camp activity and the fact that the primary visitors to the camp are school-age children.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-34: (cont'd.)
Although this assumption is included in the EIR, emergency planning is based on the maximum site occupancy of 615 persons, not 200, as explained in the FPP. Reduced Project Alternative I reduces the area of disturbance and the maximum capacity of the camp; however, the functions of the camp would be similar to the Applicant's Preferred Project. The FPP requirement that the camp conduct fire drills and mointain adequate busing and high occupancy vans on-site will be a condition of the approval if the Major Use Permit Modification is approved. The conditions of approval would apply to all groups wha would use the camp. Regarding potential impacts resulting from non-compliance with emergency procedures, people in a camp setting are a captive audience. All camp visitors will be provided with education about wildfires during the mandatory orientation to be given within the first 24 hours of coming to the camp. The orientation will also include the demonstration of the emergency alarm signal and the appropriate actions to take in an emergency. All camp visitors will be provided with education materials about the shelter-in-place capability at the site and the strict requirement that they follow directions in the event of an emergency. Please refer to the FPP, Section 6.3 "Sheltering in Place." Consequently, there is no reason to expect they would ignore direction during an emergency. As explained in the FPP, because the site is isolated, individuals are less likely to think they can find their own way to safety and thus would more readily accept instructions during an emergency, including procedures for sheltering-in-place.

Response to Comment H-35:
Please see RDEIR responses to comments D-2, D-3 and D-6.

Comment Letter H (cont'd.)

H-35 (cont'd.)

oncoming traffic (emergency and fire vehicles driving toward the property); and (vii) there will be no off-site factors which will impair on-site evacuation plans. Furthermore, the traffic analysis supporting the evacuation plan is based upon a "best-case scenario" rather than a "worst-case scenario" including smoke, congestion, panic, areas of impasse, and the possibility of cars, vans or buses (with children) becoming stuck on Mussey Grade Road and being engulfed by an oncoming wildland fire. For example, Chapter 2, Section 2.3.3.2(G) of the RDEIR presumes that: (i) there will be no back-up on Mussey Grade Road due to traffic congestion on SR 67; (ii) traffic will flow freely north on Mussey Grade Road with "minimal" friction from returning vehicles under the Salvation Army's evacuation plan, entering vehicles to evacuate neighboring properties, fire fighting or emergency personnel vehicles; and (iii) traffic flow efficiency will be reduced by only 20% when compared to traffic flow of a 2-lane highway under normal conditions. Basic common sense suggests that the *preferred plan* of evacuation of 300 cars will create a convoy of vehicles over a mile in length that will clog the internal road network of 1.3 miles, create a potential for gridlock at the left-turn exit from the Salvation Army property onto Mussey Grade Road, and further compromise the safe travel of Salvation Army visitors and neighbors on the 1.5 mile stretch of Mussey Grade Road from the Salvation Army camp entrance to SR 67. The data and assumptions set forth in the Chapter 2, Section 2.3.3.2(G) RDEIR are simply not plausible, and therefore the RDEIR's conclusions regarding the effectiveness of the Salvation Army's evacuation plan are misleading.

H-36

5. Shelter in Place Plan. Chapter 2, Section 2.3.3.2 RDEIR describes that the 19,500 sq. ft. multi-purpose room with a capacity of 1,300 people will be used as the primary shelter-in-place facility. Although the shelter-in-place *last resort* design concept is discussed elsewhere in this letter, it should be noted that the only other approved shelter-in-place design concepts in the County of San Diego are coupled with fully-compliant *secondary access*. Additionally, these shelter-in-place design concepts are in *residential subdivisions* where purchasers of homes have advance notice of shelter-in-place risks, and have the opportunity to evaluate such risks before purchasing a home. The RDEIR should specifically identify all shelter-in-place facilities within the County, and whether such facilities are served by secondary access. Furthermore, there is nothing in the RDEIR to suggest that parents of children attending the Salvation Army camp, or visitors to the Retreat Center, will have any advance notice or knowledge of the multiple risks of: (i) very high fire hazards; (ii) non-compliant road widths; (iii) excessive length of dead-end roads; (iv) inadequate fuel modification zones along Mussey Grade Road and around the camp; and (iv) most importantly *last resort* shelter-in-place design methods without sufficient findings to warrant the same. The RDEIR is inadequate because it fails to impose conditions upon the Salvation Army to notify all patrons of the property (including parents of innocent children) of extreme fire and safety risks.

H-37

C. Same Practical Effect for Non-Conforming Secondary Access. The RDEIR sets forth four (4) grounds upon which the Salvation Army seeks to ignore State, County and Ramona fire code regulations mandating *secondary access* to the Salvation Army site. The RDEIR is

H-38

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-36:
The proposed evacuation plan is not misleading. The estimated time to relocate 615 staff and visitors would be approximately 1 hour and 40 minutes as stated in the FPP. This estimate is based on the relocation of up to 120 persons in two 60 person capacity busses along with smaller vans and passenger cars at 25 minutes per trip. The relocation does not assume blocked or slowed traffic on Mussey Grade Road because if the road were blocked or had substantial traffic, the shelter-in-place alternative would be employed.

The Fire Protection Plan specifically addresses the evacuation procedure in Section 6.1 *Salvation Army Emergency Response Procedures*. According to that section, the preferred plan is early relocation, assuming that sufficient time is available to relocate visitors and staff from site without impacting Mussey Grade Road. Early relocation from the site to off-site areas via a conservative trigger threshold is the primary response that will be implemented, whenever possible, as determined by the Fire Safety Coordinator in consultation with local fire authorities.

Please see DEIR response to comment D-2.

Response to Comment H-37:
The comment is correct in noting the other approved shelter-in-place design concepts in the County of San Diego are coupled with multiple access points. However, the fact that those projects have multiple access points does not diminish the fact that they are also shelter-in-place projects. Moreover, the fact that the proposed project lacks secondary access does not mean that the proposed project's shelter-in-place program is flawed or inadequate. There are five shelter-in-place projects in the County of San Diego (The Bridges, The Crosby, CIELO, 4S Ranch or Santa Fe Valley). According to the Rancho Santa Fe Fire District, no homes were destroyed in these developments following the October 2007 Wildfires.

The County disagrees that all County approved shelter-in-place design concepts are in residential subdivisions. Major Use Permit (MUP 04-036) for A Children's Village (approved by the Board of Supervisors on February 27, 2008) included a shelter-in-place program. The Children's Village is a proposed institutional facility for foster and homeless children on a 118-acre property in the community of Campo. The proposed gymnasium would be designed as the on-site shelter-in-place facility.

The EIR is not inadequate as claimed. The threshold is whether the project would expose people to fire hazards, not whether a notice of fire risk was provided (Final EIR, page 2.3-5). CEQA does not require the EIR to address whether parents of children

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-37: (cont'd.)
attending the camp or retreat guests would be given advanced notice of the potential fire hazards associated with the project site. The EIR is required to identify the potential significant impacts (hazards due to wildfires) and to identify mitigation for those impacts. The decision makers will consider the project in light of the impacts and mitigation measures.

Please see RDEIR response to comment H-34 regarding the information abaut wildfires and emergency procedures that will be provided to all camp visitars.

Response to Comment H-38:
After the RDEIR was circulated for public review, the fire code regulations that apply to the project changed. On November 13, 2009, the 2009 Consolidated Fire Code became effective. In addition, the State Board of Forestry and Fire Protection is anticipated to certify the Consolidated Fire Code under the State Responsibility Area (SRA) regulations. Therefore, the Consolidated Fire Code now applies in lieu of the SRA regulatians, and "same practical effect," as that term is used in the SRA regulatians, is no longer relevant. (California Code of Regulations, Title 14, section 1270).

The Consolidated Fire Code does not require secondary access, but includes maximum dead end road lengths (Consolidated Fire Code Section 96.1.503.1.2). The project does not comply with the applicable maximum lengths.

The Code also includes the section 96.1.APP.104.8, "Modifications" which states, "Whenever there are practical difficulties involved in carrying out the provisions of this code, the fire code official shall have the authority ta grant modificatians for individual cases, provided the fire code official shall first find that special individual reasons make the strict letter of this code impracticable and the modification is in compliance with the intent and purpose of this code and that such modification does not lessen health, life and fire safety requirements."

Also, since the release of the RDEIR (April 2008), the Fire Protection Plan (FPP) was revised and submitted to RMWD Fire Services in November 2009. The RMWD Fire Services accepted the FPP on January 22, 2010 and the County Fire Code Specialist approved the FPP on February 2, 2010. The FPP includes justification for the approval of a modification for the project's failure to comply with the maximum dead-end road lengths (Section 5.2.1, pages 27 - 31).

Comment Letter H (cont'd.)

inadequate and substantially misleading because none of the grounds presented are justified by proper analysis, appropriate legal authority or required factual findings.

1. County Fire Code Section 96.1.503.1.1. County Fire Code Section 96.1.503.1.2 requires secondary access for the Salvation Army site. The RDEIR sets forth County Fire Code Section 104.8 as a basis for non-compliance with the County's requirement for secondary access.[23] Noteworthy is the intent of California Fire Code Section 104.8 to allow *modifications* (not exclusions) for code compliance in regard to fire safety related to *buildings, materials* and *equipment*; not *secondary access*. Furthermore, the findings of Mr. Steinhoff regarding County Fire Code Section 104.8 [24] and difficulties establishing secondary access,[25] are without appropriate authority because such authority is reserved for the fire code official (i.e., the RMWD).

H-38 (cont'd.)

2. California Code of Regulations, Title 14. Section 1273.09 of the California Code of Regulations, Title 14, Division 1.5, Chapter 7, Subchapter 2 (the "SRA Fire Safe Regulations") sets forth the maximum length of dead-end roads. The RDEIR affirms that the Salvation Army property is non-compliant with Section 1273.09 of the SRA Regulations. However, the Salvation Army advocates that it is entitled to an exception to non-compliance on the basis that: (i) Project #1 qualifies for a "same overall practical effect" exception under Section 1270.07 of the SRA Fire Safe Regulations,[26] and (ii) Mr. Steinhoff has determined that Project #1 features satisfy the "same overall practical effect" standard as defined in Section 1271

[23] Although County Fire Code Section 104.8 could not be located, California Fire Code Section 104.8 provides (in pertinent part) as follows: "Whenever there are practical difficulties involved in carrying out the provisions of this code, the *fire code official* shall have the authority to grant *modifications* for individual cases, provided the fire code official shall first find that special individual reason makes the strict letter of this code *impractical* and the modification is in compliance with the intent and purpose of this code and that such modification does not *lessen health, life and fire safety requirements*." [Emphasis Added]

[24] Mr. Steinhoff makes a finding that the shelter-in-place design concept would not "lessen health, life and fire safety requirements." There is nothing in writing from Mr. Steinhoff as an attachment to the RDEIR setting forth his findings.

[25] Mr. Steinhoff makes findings that secondary access is "impractical" and is frustrated by "practical difficulties." These findings are inconsistent with Wildland Fire Regulations which require a finding that secondary access is "unattainable" due to topography or geographical constraints. ." There is nothing in writing from Mr. Steinhoff as an attachment to the RDEIR setting forth his findings.

[26] Section 1270.07 of the SRA Fire Safe Regulations provides as follows: "Upon request by the applicant, exceptions to standards within this subchapter and mitigated practices may be allowed by the *inspection authority*, where the exception provides the same overall practical effect as these regulations towards providing defensible space." [Emphasis added.]

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-38: (cont'd.)
The Ramona Fire Code referenced in the comment does not apply to the proposed project because the County did not ratify the code. See Health and Safety Code, section 13869.7(c). As explained above, the Consolidated Fire Code now applies to the project, and the County is not ignoring the applicable fire safety regulations.

Comment Letter H (cont'd.)

of the SRA Regulations.[27] The RDEIR is insufficient in establishing a "same overall practical effect" exception to Section 1273.09 of the SRA Fire Safe Regulations because the RDEIR does not: (i) establish Mr. Steinhoff as the "inspection authority" with jurisdiction to grant exceptions, (ii) set forth findings to support Section 1271 of the SRA Fire Safe Regulations, (iii) address Section 1273.00 of the Fire Safe Regulations, or (iv) set forth findings that Project #1 satisfies Section 1273.00 of the SRA Fire Safe Regulations.

3. County Land Use Authority; Ramona Fire Code. The RDEIR is defective because it fails to analyze Section 503.1.2 of the Ramona Fire Code which requires *secondary access*. The Ramona Fire Code has no exception similar to the County Fire Code or SRA Fire Safe Regulations. The RDEIR is also defective because it fails to analyze County Fire Code Section 96.1.004(b)(2) which requires the RMWD fire chief to enforce the County Fire Code. In a bold move, without any legal support, in the first full paragraph on Page 2.3-16 of the RDEIR, the Salvation Army asserts that the County's land use authority "trumps" the County's fire code and local fire district regulations. The RDEIR must be revised to set forth the County's authority to ignore County and local fire safety regulations, in exercising its discretionary right to issue or modify a MUP.

H-38 (cont'd.)

4. Approval of Evacuation and Safety Plan. Page 2.3-16 of the RDEIR seeks to establish as a final ground for approval of Project #1 without secondary access on the basis that Mr. Delgado (Fire Marshal for RMWD) approved the Salvation Army's evacuation plan in 2004, and Mr. Miller (Unit Chief for CDF) approved the Salvation Army's evacuation plan in 2006; both without requiring secondary access. The foregoing attribution to Mr. Delgado is misleading because the RMWD's requirement for secondary access is not fairly represented in the RDEIR. Furthermore, Mr. Miller's approval of the Salvation Army's evacuation plan cannot be construed as an official position by the CDF to approve Project #1 without secondary access.

5. Fiscal Impact. Approval of the *shelter-in-place* design concept as a substitute for *secondary access* has a fiscal impact upon the County of San Diego in the form of potential lawsuits arising out of wildlife fires and related claims asserting County liability for property damage, personal injury or death suffered by 615 persons (including children) attending the Salvation Army camp, as well as countless neighbors, visitors, volunteers, fire fighters and emergency response personnel. The RDEIR requires a fiscal impact study related to such claims

H-39

[27] Section 1271 of the SRA Fire Safe Regulations provides as follows: "Same Practical Effect: As used in this subchapter, means an exception or alternative with the capability of applying accepted wildlife fire suppression strategies and tactics, and provisions for fire fighter safety, including: (a) access for emergency wildland fire equipment, (b) safe civilian evacuation, (c) signing that avoids delays in emergency equipment response, (d) available and accessible water to effectively attack wildfire or defend a structure from wildfire, and (e) fuel modification sufficient for civilian and fire fighter safety.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-39:

The County would be very unlikely to incur liability as a result of approving the proposed project with a shelter-in-place program instead of requiring a secondary emergency access. A number of statutory immunities apply to the County and its employees with respect to land use decisions and fire fighting decisions. These immunities include the following: issuance of a permit (Gov. Code, sections 818.4 and 821.2), failure to inspect or negligent inspection of property (Gov. Code, sections 818.6 and 821.4), fire protection services (Gov. Code, sections 850, 850.2 and 850.4), and planning and responding to emergencies, including wildfires (Gov. Code, section 8655).

Moreover, potential County liability as a result of approving the project would be an economic impact, which, under CEQA, is not a significant effect on the environment that must be addressed in an EIR. See CEQA Guidelines section 15131.

Lastly, the comment is speculative.

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against the County based upon a full range of human behaviors, and worst-case-scenario conditions. H-39 (cont'd.)

D. Secondary Emergency Access Road. There is no basis set forth in the RDEIR that purported exceptions to County Fire Code Section 503.1.2 and/or SRA Fire Safe Regulation 1270.07 should override County Fire Codes 503.1.2 and 902.2.2.8, Ramona Fire Code Section 503.1.2, SRA Fire Safe Regulation Sections 1273 and 1273.09, and Wildland Fire Regulations; all of which require secondary access. H-40 Furthermore, the findings set forth in Pages 2.3-17 through 2.3-19 do not establish that secondary access is "unattainable" as set forth in Section 5.2.1.2 of the Wildland Fire Regulations, but rather that secondary access would be time-consuming and costly. H-41

E. Mitigation Measures. The RDEIR is defective because it does not clearly set forth the recommended conditions of approval for Project #1. For example, are the recommended conditions applicable to the Preferred Alternative (see old Chapter 1, Section 1.1.1.2, Pages 1-7 through 1-8 of the DEIR) applicable to Project #1. The RDEIR needs to be corrected and circulated with a comprehensive list of recommended conditions applicable to Project #1, including any DEIR and FPP conditions. H-42

Chapter 2.7 – Land Use/Planning

A. County Zoning Ordinance. The property is located in the County's A-70 Agricultural zone. With a MUP, the following transient habitation uses are permitted in the A-70 zone: *campground* and *resort* services. According to Section 1545 of the County Zoning Ordinance, *campground services* are for travelers in recreational vehicles or tents; and *resort services* relate to extensive outdoor recreation and entertainment, especially for vacationers (such as dude ranches, health spas and resort hotels/motels). The RDEIR must be revised to establish that Project #1 satisfies the County's Zoning Ordinance, and must set forth criteria for Project #1 to qualify as a resort service under Section 6400 of the County Zoning Ordinance. H-43

1. Campground Services. Project #1 makes no accommodation for recreational vehicles or tents. Therefore, Project #1 cannot qualify as a *campground service*. H-44

2. Resort Service. The RDEIR is inadequate because it makes no attempt to establish the elements necessary for decision makers to find that Project #1 qualifies as a *resort service*. In fact, neither a summer youth camp nor an adult retreat center satisfies the Section 1545(c) general description of a "resort" service. Furthermore, even if Project #1 qualifies as a *resort service* (which it does not), Project #1 fails to meet the minimum development standards for *resort services*. Sections 6402(b) and (g) of the County Zoning Ordinance which establish minimum standards for *resort services* require, among other things, that (i) *resort services* will H-45

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-40:
Please see RDEIR responses to comments H-28 and H-38.

Response to Comment H-41:
The County disagrees that the EIR does not establish that secondary access is unattainable pursuant to Section 5.2.1.2 of the Wildland Fire "Regulations" (County of San Diego Guidelines for Determining Significance for Wildland Fire and Fire Protection). Section 5.2.1.2 states, "The request for exception to secondary access requirements must demonstrate the same overall practical effect as the regulation, and must address topographic, geological, and environmental conditions which make meeting the regulation unattainable." As explained in the Final EIR, the provision of secondary access is infeasible due to engineering, cost, environmental, and right-of-way acquisition/ownership constraints (pages 2.3-18 through 2.3-21). While the EIR referred to extreme cost as one of the many criteria, secondary access would be infeasible due to topographic, geographic, and environmental constraints, regardless of cost. Therefore, the provision of secondary access would be unattainable.

Response to Comment H-42:
Please see RDEIR response to comment H-10.

Response to Comment H-43:
The proposed project is a request to modify an existing Major Use Permit. In 1970 Major Use Permit P70-379 was approved for a "church retreat and recreational facility" that included five cabins, a program lodge hall, a dining room and a swimming pool with bath facilities. In 1979 the Planning Commission approved a Modification to the use permit. The Modification added five more cabins, a youth activities building and two staff housing units. In 1998 the Director of the Department of Planning and Land Use (DPLU) approved a Minor Deviation to add a snack bar, a craft building, five yurt tent structures, a caretaker's mobilehome and a temporary assembly tent. In 2004 the Director of DPLU approved a second Minor Deviation that allowed the Salvation Army to rebuild the seven structures that were destroyed in the 2003 Cedar Fire. Therefore, the site currently contains a dining room, a medical clinic, an office, a swimming pool with bathrooms/showers, sports courts, a maintenance building and yard, a 10,000 gallon water tank, four yurt camping tents, four camping cabins, a retreat facility (main building and five cabins), play fields, a presentation area, staff housing, a trailer and trails.

The current proposal is for a second Modification to the use permit that would expand the retreat center, add more camp cabins and staff housing, and expand the outdoor recreation uses to include additional playing fields, courts, a ropes course and another

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-43: (cont'd.)
swimming pool. In addition, the proposed project would add an indoor mini-theatre, a multi-purpose building, administrative support facilities, a maintenance area and a large water tank. Lastly, the proposed project would convert an existing building to a chapel.

Potential use type classifications for the proposed project included:

- Transient Habitation: Campground, defined as "Campground services involving transient habitation areas for travelers in recreational vehicles or tents. Typical uses include recreation vehicle parks." Zoning Ordinance, section 1545a. The proposed project includes a camp component.
- Transient Habitation Resort, defined as "Resort services including the provision of extensive outdoor recreation and entertainment services especially for vacationers. Typical uses include resort and recreational facilities, dude ranches, health spas, and resort hotels, motels and nudist facilities." Zoning Ordinance, section 1545c. The proposed project includes a retreat facility.
- Civic Fraternal or Religious Assembly, defined as "...meetings and activities attended regularly by and conducted primarily for their members, by nonprofit organizations which are tax-exempt pursuant to section 501(c) of the Internal Revenue Code and which may meet during or after regular business hours. Typical uses include meeting places for civic clubs, ethnic associations, social clubs, scouting organizations (other than 1505, Participant Sports and Recreation), churches, mosques, synagogues, temples, or fraternal or veteran organizations. Excluded from this use types are uses classified as Group Residential, Group Care or Transient Habitation (all types)." Zoning Ordinance, section 1348. The proposed project includes a chapel.
- Minor Impact Utilities, defined as "...public utilities which have a local impact on surrounding properties and are necessary to provide essential services. Typical uses are electrical and gas distribution substations." Zoning Ordinance, section 1355. The proposed project includes a large water tank.
- Major Impact Services and Utilities, defined as "...public services and utilities which have substantial impact. Such uses may be conditionally permitted in any zone when the public interest supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community wide interest. Typical places or uses are schools, sanitary landfills, public and private airports, public park/playground/

Response to Comment H-43: (cont'd.)

recreational areas (other than public passive park/recreational areas), hospitals, psychiatric facilities, cemeteries, nursing homes or detention and correction institutions." Zoning Ordinance, section 1350. The proposed project would provide a public service because the project includes a camp for underprivileged children.

For the reasons explained below, staff determined that the use type that most closely describes the full extent of the proposed project is Major Impact Services and Utilities.

- The proposed project would provide a public service by offering an educational camp for underprivileged children. The retreat center would also be available to various churches and organizations. The proposed project includes several uses that are typical for this use type, such as a large water tank (a utility) that will improve the fire fighting capabilities in this area and that could be expanded to serve other users and active recreation facilities (swimming pools, playing fields, ropes course and sports courts). Also, given the size of the proposed project, it could have substantial impacts.
- The Department of Planning and Land Use publishes two lists titled, "Alphabetical List of Individual Land Uses & Individual Land Uses by Use Type." Staff uses these lists to help determine the appropriate use type for proposed projects. Page 12 of the first list specifies the most appropriate use type for Camping Area (non-profit) as Major Impact Services & Utilities. Also page 3 of the second document lists Camping (non-profit) as an appropriate use under Major Impact Services & Utilities. The camping component of the proposed project would be the largest use on the site in terms of both area and occupancy.
- Zoning Ordinance section 1215b also supports classifying the proposed project as Major Impact Services and Utilities. As explained above, the proposed project includes a number of different uses. Zoning Ordinance section 1215b states: "If principle uses conducted on a lot by an individual establishment, management, or institution resemble two or more different use types, all such principle uses shall be classified in the use types whose description most closely portrays the nature of such uses. However, when the principle uses have any of the characteristics of the following list of use types, all such principle uses shall be classified in one or more of the use types on the list." The list of "use types" includes Major Impact Services and Utilities. None of the other four candidates use types listed above are included in Zoning Ordinance section 1215b.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-43: (cont'd.)

- Staff determined that the proposed project should not be classified as a Transient Habitation Campground (campground), or Transient Habitation Resort (retreat center) or Civic, Fraternal or Religious Assembly (chapel) or a Minor Impact Utility (water tank). Although each of these classifications accurately describes a single component of the proposed project, none of them describes the full scope of the proposed project.

Therefore, the proposed project is more appropriately classified as Major Impact Services and Utilities. The project site is zoned A-70, Limited Agriculture Use Regulation, and, pursuant to Zoning Ordinance section 2725b, a Major Impact Services and Utilities use type is allowed in the A-70 zone with a Major Use Permit.

Response to Comment H-44:
The principle use type is classified as Major Impact Services and Utilities and not as a "camp ground services." Please see RDEIR response to comment H-43.

Response to Comment H-45:
The principle use is not "resort service." The principle use type is classified as Major Impact Services and Utilities; therefore, the project does need to meet the development standards for resort services found in Zoning Ordinance Section 6402. Please see RDEIR response to comment H-43.

not have a density of transient habitation units greater than 5/acre,[28] (ii) *resort services* will not have less than 60% of the total site area developed with picnic grounds, outdoor sport or recreational facilities, or a private park.[29] H-45 (cont'd.)

B. Ramona Community Plan. Similar to the preceding paragraph, the RDEIR is inadequate because it makes no attempt to establish the elements necessary for appropriate decision makers to find that Project #1 satisfies the Ramona Community Plan criteria of: (i) maintaining a rural lifestyle and ambiance, and (ii) keeping residential and agricultural areas free from commercial encroachments. The RDEIR must be revised to set forth the elements necessary for appropriate decision makers to find that Project #1 satisfies the Ramona Community Plan, and the RDEIR must establish that Project #1, in fact, satisfies both the spirit and legal effect of the Ramona Community Plan. Alternatively, the RDEIR must openly discuss the inconsistencies of Project #1 with the Ramona Community Plan, and the current and future impact of such inconsistencies upon the Ramona community and surrounding areas. H-46

C. Findings to Support the Grant/Modification of a MUP. Since the nature and scope of Project #1 is exceptionally different than the nature and scope of the project approved under the Existing Permit (i.e., a 5-cabin church retreat and recreational facility), the Salvation Army should be required to show why Project #1 should not require a *new MUP*, rather than a further modification of the Existing Permit. Afterall, Project #1 is a new and radically different project than the existing camp. In addition to missing Guideline analysis for any *new* MUP (discussed above), Section 7358(a) of the County Zoning Ordinance requires that before any *new* MUP is granted or *existing* MUP is modified, it must be found that the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures, with consideration given to: H-47

1. Harmony in scale, bulk, coverage and density;

2. The availability of public facilities, services and utilities;

[28] *New* Chapter 1, Section 1.1.1 of the RDEIR identifies that the Retreat Center will be relocated to the south, nearer to the other camp facilities. There is no analysis in the RDEIR to allow decision makers to evaluate whether any individual cluster of buildings in Project #1 (including the Retreat Center), or any cluster of buildings in Project #1 when taken together, violates County Zoning Ordinance 6402(b)(1) requiring no more than 5 units/acre.

[29] Section 2.2 of the RDEIR (see also Table 2.2-2) identifies a 278-acre open space area which is required to off-set adverse project-related biological impacts. There is no analysis in the RDEIR to allow decision makers to evaluate whether the 278-acre open space easement will preclude Project #1 from satisfying the minimum 60% set-aside for recreational facilities under Section 6402(g) of the County Zoning Ordinance. For example, the 278-acre open space easement plus the 94-acre development footprint under Project #1 (see FPP Section 2.4.2) collectively occupy 64% of the 578-acre site; therefore leaving only 36% of the site to achieve the required 60% set-aside for outdoor recreational facilities (e.g., picnic grounds, outdoor sport or recreational facilities, or a private park).

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Footnote 28:
The density requirements contained in the "zone box" are not applicable to the proposed project because these pertain to residential densities and residential use types. The use has been classified as a Major Impact Services and Utilities, which is a civic use type.

Response to Footnote 29:
The principle use is not "resort service." The principle use type is classified as Major Impact Services and Utilities; therefore, the project does need to meet the development standards for resort services found in Zoning Ordinance Section 6402. This use type does not require a minimum percentage of recreational open space. The proposed 395.57 acre open space easement (under Reduced Project Alternative I) is a combination of required mitigation for biological impacts.

Response to Comment H-46:
It is assumed that the comment is focusing on the following Ramona Community Plan (RCP) Policy 3 under "Residential Goals (Page 11 of the RCP):

> *"Maintain the existing rural lifestyle by continuing the existing pattern of residential and agricultural uses on large lots outside of the Town Center and San Diego County Estates."*

The proposed project is the expansion of an existing camp and retreat center that has been in operation for several decades under the original Major Use Permit (MUP) P70-379 and Modification P70-379W. The project proposes to continue the existing uses of the site, which are a youth camp and retreat facility. The analysis provided in the EIR supports the conclusion that the proposed project would be consistent with the rural lifestyle and community character of the Mussey Grade Road area. The project site is large, relatively isolated and is not visible from public vantage points off-site including Mussey Grade Road. The EIR concludes that the project will not result in impacts related to land use, traffic, noise, or aesthetics. The basis for the conclusions in the EIR are further discussed in DEIR responses to comments JA-4, JA-11, JCC-2, JCC-11, JCC-13 and JCC-20.

In addition, the proposed project is not a commercial use type, since the Salvation Army is a charitable organization. The rental income would be used for the non-profit services that the Salvation Army provides to the community. The proposed camp expansion and retreat center have been categorized as a Major Impact Service and Utilities under Zoning Ordinance section 1350, which is a Civic Use Type, not a Commercial Use Type.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-46: (cont'd.)
The RCP does not include a policy of "keeping residential and agricultural areas free from commercial encroachments" as stated in the comment.

Response to Comment H-47:
The existing camp operates under an existing major use permit which would be modified to address the proposed camp expansion. It makes no difference whether the existing major use permit is modified or a new major use permit is required. The process is identical in terms of discretionary review and environmental analysis. See Zoning Ordinance, section 7378a. The required findings for approving a use permit modification will be discussed in the staff report prepared for the Planning Commission hearing. The EIR is not required to discuss these findings.

Comment Letter H (cont'd.)

3. The harmful effect, if any, upon desirable neighborhood character;

4. The generation of traffic, capacity and character of surrounding streets;

5. The suitability of the site for the proposed type and intensity of use; and

6. Any other relevant impact of the proposed use.

H-47 (cont'd.)

The RDEIR is inadequate because it makes no attempt to establish the elements necessary for decision makers to determine whether: (i) Project #1 requires a *new* MUP rather than modifying the Existing Permit, or (ii) whether the location, size, design and operating characteristics of Project #1 is compatible with adjacent users, residents, buildings or structures based upon the 6 criteria set forth above. The failure of the RDEIR to make these required findings suggests: (i) Project #1 requires a *new* MUP rather than modifying the Existing Permit,[30] and (ii) Project #1 represents a significant adverse land use impact upon the Ramona community and surrounding areas which must be mitigated to a level below significance.

D. Erata to EIR Chapter 2.7. Chapter 2, Section 2.7 of the RDEIR presents conclusory statements that implementation of fire safety recommendations in the FPP will *reduce risk* to the camp, and will *reduce risk* to the camp and its visitors.[31] This new information turns fire risk analysis on its head. It is false and misleading, and must be corrected in the RDEIR. Proper land use analysis of fire risks following the Cedar and Witch fires would be to: (i) evaluate what on-site and off-site fire prevention measures must be taken by the Salvation Army in order to protect the existing camp and its current population (165 summer users, 90 off-season users) under the Existing Permit; then (ii) evaluate any *increases in fire risk* associated with expanding the camp to 615 year-round users, including both on-site and off-site fire risk impacts to the camp, its visitors, emergency personnel, neighbors and the surrounding community. The RDEIR is wholly deficient in that it does not assess on-site and off-site *increases in fire risk* associated with nearly quadrupling the camp population, and converting to year-round (including Santa Ana "very high" fire risk season) operations. The RDEIR must be corrected to analyze all *increases in fire risk* presented by Project #1 in comparison to the existing camp and its current levels of operation.

H-48

[30] The RDEIR does not provide a clear, concise comparison of the existing camp and Project #1 because the logical conclusion is that Project #1 is a new community that requires a *new* MUP. If Project #1 requires a *new* MUP, then the Wildland Fire Guidelines apply. If the Wildland Fire Guidelines apply, then the Salvation Army cannot show that Project #1 satisfies mandatory shelter-in-place requirements. If Project #1 fails to satisfy shelter-in-place requirements, then both Project #1 and Project #2 must be denied.

[31] Chapter 2, Section 2-7 fails to evaluate Project #1 risks related to the neighbors the the surrounding community.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Footnote 30:
The County disagrees with the statement that the EIR does not provide a clear, concise comparison of the existing camp and Reduced Project Alternative I ("*Project #1*"). Chapter 1.0 of the Final EIR describes the project, and Chapter 4.0 describes each of the alternatives. The proposed alternatives have the same operating characteristics as the project as originally proposed. The difference between the Applicant's Preferred Project and alternative project designs is primarily the number of campers and the building locations and the reduction in anticipated environmental impacts.

The Applicant's Preferred Project and Reduced Project Alternative I satisfy the requirements for shelter-in-place, as discussed in RDEIR responses to comments H-26, H-27 and H-28.

Response to Comment H-48 and Footnote 31:
The fire risk associated with a camp population of 615 and measures to reduce the risk are evaluated in detail in the Final EIR, Section 2.3 Hazards, and the FPP prepared for the project. The County disagrees that the fire risk analysis is false, misleading or inadequate. An evaluation of potential wildfire hazards was completed for the proposed project and it was determined that with the application of the stated mitigation measures, impacts would be reduced to less than significant levels. The conclusions in the environmental document are based on an adequate analysis of the fire risk.

Please see RDEIR responses to comments H-18, H-19, H-23 and H-24.

Chapter 3.0 – Cumulative Impacts

A. Erata to EIR Chapter 3.0. Similar to the immediately preceding paragraph, Chapter 3, Section 3.1.3 of the RDEIR presents conclusory statements that FPP requirements will provide a *reduced level of risk* for the camp and its visitors, and will *drastically reduce* the wildfire risk on the site. Once again, this new information turns fire risk analysis on its head. It is false and misleading, and must be corrected in the RDEIR. The RDEIR is wholly deficient in that it does not assess on-site and off-site *increases in fire risk* associated with nearly quadrupling the camp population, and converting to year-round operations. The RDEIR must be corrected to analyze all *increases in fire risk* presented by Project #1 in comparison to the existing camp and its current levels of operation. H-49

Chapter 4.0 – Project Alternatives

A. Range of Alternatives. The courts and CEQA Guidelines require that each EIR present a "range of reasonable alternatives" and that each EIR include sufficient information about each alternative "to allow meaningful evaluation, analysis and comparison with the proposed project." *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal. 3d 553, 566 (1990); *Residents Ad Hoc Stadium Comm. v. Board of Trustees*, 89 Cal.App. 3d 274, 287-88 (1979); Guidelines §§ 15126.6(c)(d). The range of alternatives must be sufficient "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." *San Bernardino Valley Audubon Soc'y v. County of San Bernardino*, Cal.App. 3d 738, 750-51 (1984); Guidelines §§ 15126.6(c)(f). Additionally, one of the alternatives studied must be the "no project" alternative. Guidelines § 15126.6(e). The no-project analysis should discuss existing conditions as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans, and consistent with available infrastructure and community services. H-50

B. Project #1 Analysis. Chapter 4, Section 4.3 of the RDEIR sets for the analysis of Project #1, including an assessment of biological impacts. Once again, the RDEIR presents a false and misleading comparison of the Preferred Alternative (no longer under consideration) to Project #1 in order to make a finding of insignificant biological impacts. All references to the Preferred Alternative must be eliminated from the RDEIR, and biological impacts must be evaluated based upon a comparison of Project #1 and the existing camp. Furthermore, Chapter 4, Section 4.4.2.3 concludes that implementation of FPP requirements would reduce the hazards associated with wildfires to below a level of significance. The foregoing conclusion is without support. The RDEIR must be corrected to include analysis and findings consistent with the County of San Diego Guidelines for Determining Significance dated March 19, 2007. H-51 H-52

C. Project #2 Analysis. *New* Chapter 1, Section 1.1.2 of the RDEIR appears to be intentionally inaccurate and misleading in that it presents a reduction in project size and scope H-53

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-49:
Please see RDEIR response to comment H-48.

Response to Comment H-50:
Comment noted.

Response to Comments H-51:
The analysis of Reduced Project Alternatives I and II were included in the RDEIR (April 2008) to provide a detailed environmental analysis in order to allow the decision makers to approve the Applicant's Preferred Project or one of the project alternatives. The purpose of providing a more detailed analysis of Reduced Project Alternative I was not to replace the analysis of Applicant's Preferred Project but to supplement the EIR so that the decision makers could consider this alternative for approval. Therefore, the Applicant's Preferred Project should remain in the EIR.

The EIR does not identify biological impacts associated with Reduced Project Alternative as "insignificant." Although impacts would be lessened under this alternative, and specific conflicts with the BMO would be avoided with implementation of the Reduced Project Alternative I, the same impacts and mitigation measures would apply to Reduced Project Alternative I as to the Applicant's Preferred Project (see Final EIR, Section 2.2.4).

Response to Comment H-52:
The County disagrees that the conclusion in Section 4.4.2.3 regarding fire hazards is without support. The analysis and requirements in the FPP are the basis for the conclusion that the impacts associated with fire hazards will be mitigated to a less than significant level.

Please see RDEIR responses to comments H-25 and H-28 regarding compliance with the County Guidelines for Determining Significance.

Response to Comment H-53 and Footnote 32:
As stated previously any reference to the "Preferred Project" and/or reference to the "Preferred Alternative" has been deleted from the Final EIR (see RDEIR response to comments, H-2, H-3 and H-4.) The Final EIR simply refers to the project as the Applicant's Preferred Project and to the alternatives as Reduced Project Alternative I and Reduced Project Alternative II, as they are described in both the Summary Chapter and Chapter 4.0. The purpose of providing a more detailed analysis of Reduced Project Alternative I was not to replace the analysis of Applicant's Preferred Project, but to supplement the

from the Preferred Alternative (no longer under consideration) to Reduced Project Alternative II ("Project #2"). The RDEIR must be revised to accurately present Project #2 as an alternative to Project #1, rather than as an alternative to the Preferred Alternative. In doing so, it appears that the only reduction is project size and scope from Project #1 to Project #2 is as follows:

- Retreat Center – 1 cabin (36 users; 10,000 sq. ft.)
- Education Camp – 3 cabins (66 users; 9,750 sq. ft.)
- Multi-Purpose Building[32] – Reduction of 9,000 sq. ft. (19,500 to 10,500 sq. ft.)

H-53 (cont'd.)

In general, based upon limited information available regarding Project #1 and Project #2, it appears that Project #2 represents an approximate 16% reduction in users, and an approximately 13% reduction in building density, in comparison to Project #1. Given such a minor variation between Project #1 and Project #2, Project #2 alone does not present decision makers with a reasonable range of project alternatives.

In addition, Chapter 4, Section 4.4.2.2 of the RDEIR appears to present a false and misleading comparison of the Preferred Alternative (no longer under consideration) to Project #2 in order to make a finding of insignificant biological impacts. All references to the Preferred Alternative must be eliminated from the RDEIR, and biological impacts must be evaluated based upon a comparison of Project #2 and the existing camp.

D. Vegetation Impact Comparisons. Chapter 4, Sections 4.3 and 4.4 of the RDEIR are vague and confusing in regard to whether the RDEIR has considered the biological impacts of expanded fuel modification zones. For example, Section 4.3.2.2 (fourth sentence) of the RDEIR provides as follows: "Reduced Project Alternative I would considerably reduce the disturbance of natural vegetation and sensitive species within the project site...without accounting for expanded fire modification requirements...." Similarly, Section 4.3.2.2 (eighth sentence) of the RDEIR provides as follows: "Impacts to Southern Mixed Chaparral are shown as a slight increase; however, as with all of the vegetation impact comparisons, this does not account for any additional FPP fire clearing requirements that would be required for the proposed project." Finally, Section 4.4.2.2 (fifth sentence) of the RDEIR provides as follows: "Like Reduced Project Alternative I, Reduced Project Alternative II would reduce the disturbance of natural vegetation and sensitive species within the project site...even without accounting for the additional vegetation clearing that would be requred [sic] for the proposed project as a result of expanded fuel modification zones." Hence, in addition to the false and misleading comparisons of Project #1 and Project #2 with the Proposed Alternative, it appears that the Salvation Army intends to side-step the biological impacts (and waste disposal

H-54

[32] The RDEIR is inadequate in regard to describing Project #2 since it presents no analysis of the shelter-in-place plan for project inhabitants, emergency personnel and neighbors of the project based upon a reduced shelter size of 10,500 sq. ft. (maximum capacity of 500 people for a total Project #2 population of 513 people).

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-53 and Footnote 32: (cont'd.)
EIR so that the decision makers could consider this alternative for approval. Therefore, the Applicant's Preferred Project should remain in the EIR.

The County concurs with the first two bullets in the comment's description of the differences between Reduced Project Alternative I and Reduced Project Alternative II. In response to this comment, the EIR has been revised. In Reduced Project Alternative II, the size of the multi-purpose building will be the same as under Reduced Project Alternative I (19,500 square feet). Therefore, there would be adequate space to shelter the maximum camp population and area residents under both alternatives.

The County disagrees that the EIR does not present a "reasonable range of project alternatives."

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Further, section 15126(d)(5) states that "the range of alternatives in an EIR is governed by the 'rule of reason' and only requires the EIR to set forth those alternatives necessary to permit a reasoned choice."

The alternatives discussed in the EIR constitute a range of reasonable alternatives. Reduced Project Alternative I would: relocate the retreat center to avoid significant biological impacts; decrease the size of the retreat center by one 16-unit cabin; eliminate the retreat center gatehouse, the tent component, a restroom/shower building, outdoor seating and an outdoor presentation area. In total, Reduced Project Alternative I would reduce the capacity of the camp by 133 users and decrease the total project building footprint by 11,150 square feet. Compared to Reduced Project Alternative I, Reduced Project Alternative II would eliminate additional cabin from the retreat center component (two cabins total) and would eliminate three cabins from the education camp component for a reduction of 11,346 square feet of buildings and 102 persons who would attend the camp. The substantial reduction in the building square footage and the number of persons provides a reasoned choice for the decision makers. Please refer to Table 4-1 for a break down of project alternatives impact comparison.

Response to Comment H-54:
The fuel modification zones required in the FPP are based on the Reduced Project Alternative I development configuration. The biological impacts of the expanded fuel modification zones were not analyzed for the Applicant's Preferred Project because this

Comment Letter H (cont'd.)

requirements) of implementing expanded fuel modification zones recommended in the FPP. The RDEIR must be corrected to include new biological analysis related to on-site and off-site vegetation clearing required to satisfy the FPP's expanded fuel modification zones for Project #1 and Project #2.[33] The RDEIR should also be corrected to include new biological analysis related to on-site and off-site vegetation clearing required to protect the existing camp and its visitors under the Existing Permit. H-54 (cont'd.)

E. No Project Alternative. Under the "no project" alternative, the Salvation Army could make modest, incremental improvements to the summer camp under the Existing Permit in order to safely serve more youth. A proper alternatives analysis should include the enhancement of the summer camp for youth as originally contemplated by the Existing Permit, absent the commercial enterprise of a massive, year-round, 615-adult conference facility and Retreat Center. H-55

Chapter 6.0 – Environmental Effects Found Not to be Significant

Concerns related to the new text in Chapter 6.0 are raised elsewhere in this letter. H-56

Chapter 9.0 – List of Mitigation Measures and Environmental Design Considerations

Concerns related to the new text in Chapter 9.0 are raised elsewhere in this letter. H-57

Appendix B – Biological Report

It appears that the Salvation Army has not engaged Merkell & Associates to conduct any meaningful on-site biological analysis since 2001. Hence, the Salvation Army appears to be attempting to push-through its application to modify the Existing Permit based upon clearly outdated environmental analysis. The RDEIR should be corrected to include current environmental analysis (including biological reporting) so that Project #1 environmental impacts can be understood and fairly considered. For example, the Cedar fire (2003) destroyed much of the natural vegetation in the vicinity of the project site. Biological studies conducted prior to or immediately after the Cedar fire fail to take into consideration any changes in natural vegetation or wildlife habitat since the Cedar fire. As a result, there is no contemporaneous environmental baseline for decision makers to evaluate environmental impacts of Project #1. Also for example, the Witch fire (2007) burned on both sides of Ramona, and it is highly likely that wildlife escaped the Witch fire by migrating southwest, ahead of the prevailing direction of the Santa Ana winds and flame. It is also highly likely that since the Witch fire wildlife has formed new habitat in the vicinity of the project site. None of the foregoing environmental considerations are H-58

[33] Chapter 9, Section 9.2.2 of the RDEIR states that the FPP requires fuel modification zones with a minimum of two times and up to twenty times the width of predicted flame length heights. This is not consistent with the FPP.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-54: (cont'd.)
design will not be presented to the decision makers. Rather, the Reduced Project Alternative I will be presented to the decision makers, and the impacts of this alternative are analyzed in the EIR (see Final EIR, Chapter 4.0 Project Alternatives). Because the increased fuel modification zones are based on Reduced Project Alternative I, there is an apparent increase in vegetation impacts as compared to the impacts for the Applicant's Preferred Project. Applying the expanded fuel modification zones required in the FPP to the Applicant's Preferred Project development configuration would greatly increase the amount of vegetation that would have to be cleared, resulting in greater vegetation impacts as compared to the impacts for the Reduced Project Alternative I. The unavoidable conflicts with the BMO would remain, and would be greatly exacerbated with the application of these expanded zones to the Applicant's Preferred Project development configuration.

Pursuant to the Consolidated Fire Code and the RMWD Vegetation and Management Ordinance, the Salvation Army is required to provide fuel modification zones around the existing facilities at the camp. This on-going vegetation clearance is not part of the proposed project, and, therefore, need not be analyzed in this EIR.

Response to Footnote 33:
The required fuel modification zones are 2 to 6 times adjacent flame lengths. However, including the irrigated landscape areas that will occur throughout the project site, the actual "modified" fuel areas is 20 times adjacent flame length in certain areas.

Response to Comment H-55:
Comment noted. The analysis for "No Project alternative" assumes that the camp would be expanded as allowed under the original permit. Please refer to Chapter 4.0 of the Final EIR.

Response to Comment H-56:
Comment noted.

Response to Comment H-57:
Comment noted.

Response to Comment H-58:
Please refer to responses to comments H-11 and IB-1.

contemplated by the RDEIR, and all of the foregoing environmental considerations constitute grounds to require updated environmental analysis prior to recirculation of the RDEIR. H-58 (cont'd.)

Appendix J – Fire Protection Plan

The Fire Protection Plan dated April 2008 (FPP) must be revised as set forth herein, and recirculated for public review.

Page 6- All references to the maximum capacity of the Salvation Army property under Project #1 must be identified as 615 persons, not 641 persons as set forth on Page 6 and throughout the FPP. H-59

Page 6 – There is no justification for off-season populations of around 200 persons.

Page 7 – The first sentence of the second paragraph of Section 1.2 is false, and must be modified or deleted because Project #1 does not meet all Code requirements except for secondary access. In fact, Project #1 is non-compliant with numerous State, County and local laws (including, without limitation, the SRA Fire Safe Regulations, fire codes and the Wildland Fire Regulations) which should be specifically identified in a Table to the RDEIR and/or FPP, along with purported exceptions to non-compliance. The second sentence of the second paragraph of Section 1.2 needs to be revised to attribute *same practical effect* findings to persons of appropriate authority under State, County and local laws. H-60

Page 11 – Fuel modification zones of 3-4 times predicted flame length, as identified in Table 1 of the FPP, are reported as 2-20 times predicted flame length in Section 5.1.1 of the FPP and Section 2.3.3.2(A) of the RDEIR, and must be made consistent. H-61

Page 14 – The fire history of the project area is inadequate, particularly with regard to details of the Cedar fire and Witch fire. The size and type of buildings destroyed in the Cedar fire should be identified, as well as the size and type of buildings re-built after the Cedar fire. H-62

Page 15 – Each of the proposed buildings in Project #1 should be specifically identified (size, use, new, re-built, etc.), and contrasted with similar details regarding original structures (1997) and current structures (2008). The RDEIR or FPP should include a Table showing by percentage basis proposed increases in size and type of use of original (1997), existing (2008) and Project #1 facilities. H-63

Page 16 – The RDEIR should set forth the long-term fiscal impact upon emergency response facilities and personnel arising out of approval of Project #1. H-64

Page 17 – Fire response analysis needs to address full evacuation of the site (300 cars, and buses) in combination with the neighborhood population traveling north on Mussey Grade H-65

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-59:
The County disagrees that either the EIR and/or FPP are inadequate or deficient with respect to the analysis of wildfire issues. Therefore, fundamental changes to the EIR and FPP are not necessary, and the criteria for requiring recirculation under CEQA Guidelines section 15088.5 have not been met.

Pursuant to this comment, the FPP has been revised and is based on on-site occupancy of 615 persons. The statement that the camp population from September to February (typical fire season) would be 200 persons is based on existing and anticipated camp operations and the fact that the primary visitors to the camp are school-age children. Although, this statement is included in the FPP, emergency planning is based on maximum site occupancy of 615 persons at full build-out, not 200 persons.

Response to Comment H-60:
The County disagrees that the FPP should be revised and is not consistent with all Code requirements (except for dead end road lengths). Please see RDEIR responses to comments H-25, H-28 and H-38. Moreover, while the comment asserts that the project is not in compliance with "numerous State, County and local laws", the comment does not explain what specific provisions of State, County and local laws the project would violate. Regarding same practical effect findings, please see RDEIR response to comment H-38.

Response to Comment H-61:
The County concurs that the FPP and RDEIR indicated differing flame lengths. This has been corrected on pages 17 and 18 of the FPP and page 2.3-2 of the Final EIR.

Response to Comment H-62:
Refer to responses to comments H-18 and H-19. Seven structures were burned in the Cedar fire. All of those structures have been replaced.

Response to Comment H-63:
Please see RDEIR response to comment H-5.

Response to Comment H-64:
Under CEQA, an economic impact is not on impact on the physical environment that must be addressed in an EIR. See CEQA Guidelines section 15131. However, the project will participate in a community facilities district (CFD). As stated on FFP page 13:

RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-64: (cont'd.)

> "... the camp's participation in a community facilities district of CFD which will fund ongoing monitoring by RFD staff or equivalent. The CFD will be a funding source for the ongoing Fire Department inspections of the Salvation Army fire protection systems. It will be formally established and will meet County/Ramona requirements for this type of service district."

Response to Comment H-65:
Please see RDEIR responses to comments D-3, D-4 and H36.

San Diego County Department
of Planning and Land Use
June 11, 2008
Page 26

Road. The RDEIR should include findings and analysis regarding fire responses as contained in the Cedar Fire Report. H-65 (cont'd.)

Page 21 – The RDEIR and FPP cannot bury faulty fire modeling, including weather and wind input variables and reliance upon DPLU inputs, when determining such critical matters as flame length, fire velocity and fuel modification zones. The RDEIR and FPP need to be revised based upon actual weather, wind and other data available from the Cedar and Witch fires. H-66

Page 24 – Section 4.2 of the FPP (no feasible secondary access) is in contrast with Chapter 2, Section 2.3.1 (seventh paragraph) of the RDEIR. The RDEIR needs to be corrected. The FPP must analyze whether current fire codes and emergency response regulations prohibit fire/emergency personnel from traveling down Mussey Grade Road to the Salvation Army property, under hazardous conditions. H-67

Page 25 – Table 1 of the FPP is in conflict with Section 4.1.1 (second paragraph) of the FPP. H-68

Page 26 – The FPP should be revised to cite Wildland Fire Guidelines as recommending minimum fuel modification zones of *4 times* the highest predicted flame length, to contrast Project #1's fuel modification zones of *2 times* the highest predicted flame length. H-69

Page 28 – The second paragraph (*6 times* predicted flame length) is misleading, and must be corrected. The shelter-in-place structure is exposed to Santa Ana winds from the north, with much less protection. H-70

Page 32 – Dudek should be required to analyze secondary access as part of the FPP, rather than defer to the DPLU analysis in the RDEIR. H-71

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, SIGNED BY JEFFREY R. STOKE, DATED JUNE 11, 2008 (CONTINUED)

Response to Comment H-66:
Please see RDEIR response to comment H-32.

Response to Comment H-67:
The inconsistency referenced in the comment has been corrected on page 2.3-3 of the Final EIR. The County is not aware of regulations which would prohibit emergency personnel from traveling down Mussey Grade Road to the Salvation Army property under hazardous conditions.

Response to Comment H-68:
There is no Section 4.1.1 in the FPP. If comment is referring to Section 5.1.1, this section has been modified following public review to clarify the size of the fuel modification zones and to be consistent with Table 1.

Response to Comment H-69:
The Wildland Fire Guidelines do not require fuel modification zones to be based on predicted flame length. The fuel modification zones provided in the FPP are based on fire modeling and predicted flame length.

Response to Comment H-70:
The County disagrees that predicted flames are inaccurate or misleading. Appendix E of the FPP illustrates the extent of fuel modification zone for the site and for the shelter-in-place facility. As illustrated, flame lengths from the north are predicted to be approximately 25 to 30 feet directly adjacent to the fuel modification zone. The text accurately describes the fuel modification zones between 6 and 20 times the predicted flame lengths. The Santa Ana wind pattern is from the northeast, not directly north as suggested by the comment. Therefore, fuel modification zones recommended in the FPP are appropriate, including those for the shelter-in-place structure.

Response to Comment H-71:
The County disagrees that the FPP should also analyze the infeasibility of secondary access for the project site. The feasibility analysis presented in the EIR is referenced in the FPP on page 29. Both the Final EIR and FPP will be presented to the decision makers.

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Thank you for your consideration of these matters. If you have any questions regarding the foregoing, please do not hesitate to contact me at (619) 515-3286.

Sincerely yours,

Jeffrey R. Stoke
Procopio Cory Hargreaves
& Savitch, LLP

JRS:wsl

cc: Ms. Mary McGuire
Mr. Jeff McGuire
Mussey Grade Road Alliance
Ramona Municipal Water District

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Comment
Letter I

MUSSEY GRADE ROAD ALLIANCE
"Preserving Historic Mussey Grade"

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June 10, 2008

BY EMAIL

Received 6/10 AMB

Ms. Kristin Blackson
Environmental Coordinator/Planner III
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: Revised Draft Environmental Impact Report (RDEIR) for the Salvation Army Proposed Expansion of Major Use Permit for the Proposed Divisional Camp and Retreat Project MUP 70-379W2, ER 98-14-023, SCH. NO. 2000031058

Dear Ms. Blackson:

Attached please find Mussey Grade Road Alliance ("Alliance") Comments Regarding Wildland Fire and the Fire Protection Plan based on the Revised Draft Environmental Impact Report (RDEIR) in the above-mentioned permit proceeding. The Alliance comments were prepared by Joseph Mitchell, Ph.D, M-bar Technologies and Consulting, LLC and Bonnie Hendricks, M.S., senior consulting biologist. The deadline for comment submission is June 11, 2008 and therefore these comments are submitted timely to the Department of Planning and Land Use ("DPLU") on behalf of the Alliance. I-1

Also prepared on behalf of the Alliance is a wildlife tracking study by Barry Martin, San Diego Tracking Team. Please find attached, as three files, the wildlife tracking study and associated figures collectively titled, Animal Activity Assessment in Connection with Proposed Land Development on the Salvation Army Property off Mussey Grade Road. I-2

Due to the serious concerns of the Alliance regarding material inaccuracies and deficiencies in the RDEIR in both the areas of wildland fire and biology, and the fundamental changes that would be necessary to correct these inaccuracies and deficiencies, the Alliance requests that the DPLU reject the RDEIR until and unless the fire and biology issues are I-3

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE "COVER LETTER," SIGNED BY DIANE CONKLIN, DATED JUNE 10, 2008

Response to Comment I-1:
Comment noted.

Response to Comment I-2:
The information referenced in this comment has been reviewed. Please see DEIR responses to comments IB-3, IB-28, IB-29, IB-30, and IB-45.

Response to Comment I-3:
The County disagrees that the EIR is inadequate or deficient with respect to the analysis of wildfire or biology issues. Therefore, fundamental changes to the EIR are not necessary, and the criteria for requiring recirculation under CEQA Guidelines section 15088.5 have not been met.

Comment Letter I (cont'd.) 2

resolved. If the application process proceeds and these problems are addressed, the Alliance further requests ***a recirculation*** of the **REVISED RDEIR** once the document has been amended. I-3 (cont'd.)

As you may know, the application for the proposed expansion of the former Sierra del Mar campground, traditionally operated as a small church camp along rural and historic Mussey Grade Road from the 1970s until purchased by the national and multi-billion dollar Salvation Army ("Army") concern in 1998, has been in process for about nine years. This project, with a proposed 20-year build out density of 748 persons, was twice rejected by the Ramona Community Planning Group ("RCPG"). While a figure of 613-person occupancy is also bandied about, the RDEIR is unclear concerning the total maximum occupancy of the expansion. The proposed expansion is an incongruous commercial venture that does not fit into the remote, rural community of Mussey Grade Road. The impact of a commercial development on the community character is insufficiently addressed in the DEIR and the RDEIR. Nevertheless, despite all its obvious flaws, this project, which should have died on the table long ago, persists because the Army -- due to the unlimited funds available to it -- can afford to resuscitate the patient every few years. I-4

Now the project comes to us once again in revised form, recirculated by the DPLU at the request of the Alliance specifically for the purpose of addressing the inadequate "Fire Protection Plan" ("FPP") proffered by the applicant as the answer to the problem of a potential wildland fire. The Alliance has reviewed the changes and we are alarmed at what we have found. Our concerns are heightened due to recent events, specifically the 2003 Cedar Fire, the largest fire in recorded history of the State of California, and the 2007 October Firestorm. The issue of wildland fire is on the minds of everyone in San Diego County. Catastrophic wildland fire can no longer be characterized as a parochial concern of Mussey Grade residents. I-5

As you are no doubt aware, Mussey Grade is a dead end road. The Alliance has repeatedly warned various governmental agencies about the problem of wildland fire and this project. The Alliance originally brought the matter of wildland fire to the attention of DPLU, the RCPG and the Ramona Municipal Water District ("RMWD")[1] in the early 2000s and addressed the issue in the Alliance's comprehensive comments to the original Draft EIR in 2005. ***Today, in the wake of both the unprecedented Cedar Fire, which burned the area and destroyed some 200 homes, representing approximately 2/3rds of all homes along the lower portion of Mussey Grade south of the Salvation Army entrance, and the Witch Fire of the October 2007 Firestorm (when all of Ramona was ordered to evacuate), the Alliance*** I-6

[1] The RMWD has twice required a secondary access as a condition of the project's approval, most recently on December 19, 2007. Despite this requirement, the RDEIR states that the County believes that a secondary access is not possible and that the County is under no obligation to require a secondary access. See 2.3-14. However, the County is requiring secondary access for other projects in Ramona, such as the Cummings Ranch project. This inconsistent application of a safety requirement cannot be explained in the present case *unless* the choice to proceed with this project is actually a choice to favor this particular applicant – an influential and nationally recognized organization. In fact, the practical difficulties of securing a secondary access should alert the County to the unsuitability of the site for a project contemplating a 240,000 square foot expansion and the quadrupling of the present overnight capacity of the facility. I-6 Footnote 1

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE "COVER LETTER," SIGNED BY DIANE CONKLIN, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment I-4:
The proposed maximum occupancy of the camp associated with Reduced Project Alternative I is 615 persons at any one time.

The County does not agree that the proposed project is a commercial venture. The proposed project is not a commercial use type. The Salvation Army is a charitable organization and income from rental of the site to groups and other organizations would be used for the Salvation Army to provide non-profit services. Please see DEIR response to comment H-8.

Response to Comment I-5:
Comment noted. The County also required recirculation of the Draft EIR (May 2005) in part due to recently adopted County policies and amended codes addressing fire protection planning and the requirement that a Fire Protection Plan be prepared for the proposed project. The Final EIR specifically states on page 2.3-2, "Fire history is an important component of fire protection planning. Fire history information can provide an understanding of fire frequency, fire type, most vulnerable project areas and significant ignition sources ..." Appendix C – Fire History Exhibit, provided in Appendix I (FPP) presents a fire history exhibit of the project site. The text of the EIR goes on to further describe how both the Cedar Fire and the Witch Creek Fire affected the project site and influenced the fire safety measures presented in the FPP.

Response to Comment I-6:
Comments noted. The fire hazards issues raised by the comment are addressed in the following series of responses to comments.

Response to Comment I-6, Footnote 1:
Please see RDEIR responses to comments H-22 and H-25 through H-28 regarding the former requirement from the RWMD for secondary access. The County acknowledges that secondary access has been required as a condition of approval for other projects, including the Cummings Ranch project; however, the County disagrees that there is an "inconsistent" application of this requirement. Secondary access is infeasible due to topographic, geological, environmental and economic constraints as described in Section 2.3, Hazards and Hazardous Materials of the EIR.

Since the release of the RDEIR (April 2008), the County has updated the governing fire code. The applicable fire code for this project is now the 2009 County of San Diego Consolidated Fire Code ratified by the County Board of Supervisors on November 13, 2009. See Health and Safety Code, section 13869.7(c). In addition, the State Board of Forestry and Fire Protection is anticipated to certify the Consolidated Fire Code under

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE "COVER LETTER," SIGNED BY DIANE CONKLIN, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment I-6, Footnote 1: (cont'd.)
the State Responsibility Area (SRA) regulations. Therefore, the Consolidated Fire Code now applies in lieu of the SRA regulations, and "same practical effect," as that term is used in the SRA regulations, is no longer relevant. (California Code of Regulations, Title 14, section 1270). The Ramona Fire Code referenced in the comment (Ramona Fire Ordinance 02-045) does not apply to the project because that Ordinance was not included in the Consolidated Fire Code that the County ratified.

The Consolidated Fire Code does not require secondary access, but includes maximum dead end road lengths (Consolidated Fire Code Section 96.1.503.1.2). The project does not comply with the applicable maximum lengths.

The Code also includes the section 96.1.APP.104.8, "Modifications" which states, "Whenever there are practical difficulties involved in carrying out the provisions of this code, the fire code official shall have the authority to grant modifications for individual cases, provided the fire code official shall first find that special individual reasons make the strict letter of this code impracticable and the modification is in compliance with the intent and purpose of this code and that such modification does not lessen health, life and fire safety requirements."

Also, since the release of the RDEIR (April 2008), the Fire Protection Plan (FPP) was revised and submitted to RMWD Fire Services in November 2009. The RMWD Fire Services accepted the FPP on January 22, 2010 and the County Fire Code Specialist approved the FPP on February 2, 2010. The FPP includes justification for the approval of a modification for the project's failure to comply with the maximum dead-end road lengths (Section 5.2.1, pages 27 - 31).

Therefore, while secondary access can be provided for other County projects, such as Cummings Ranch, it is infeasible for this project, but the lack of secondary access will not result in a significant impact from wildfires, as demonstrated in the Final EIR and FPP (Appendix I).

is even more convinced of the danger that this expansion project poses to residents and has detailed a number of issues that remain unaddressed, inadequately addressed or inaccurately addressed in the RDEIR. I-6 (cont'd.)

For the hundreds of homeowners and residents south of the entrance to the Salvation Army property, the ever-present threat of wildfire and the need to evacuate is a continuing reality. The problem with the proposed camp expansion with regard to fire is simply this: **If guests at the camp evacuate in the hundreds during a catastrophic wildland fire, those Ramona residents living along Mussey Grade south of the camp would be impeded from evacuating timely. A mass casualty event could occur.** I-7

Even if the hundreds of planned guests at the Army's facility did not evacuate, but instead chose to remain behind, a mass casualty event could still occur: Some 90% of the Army's facilities at the camp were previously destroyed in the Cedar Fire, which burned the entire area. We are not reassured by the Army's proposed use of "Shelter-in-Place" that: 1) It will work; or 2) People will remain on site in a catastrophic fire situation, which is a requirement for the FPP "Shelter-in-Place" scheme to work. I-8

Below are ***key conclusions*** from our review of the RDEIR:

- **The RDEIR Traffic Study is completely inadequate and, if adopted, would pose a grave danger to the residents of Mussey Grade Road**. The Traffic Study calculations include LESS THAN HALF of the cars that would be able to access the camp. The proposed parking lot would be built to hold a total capacity of 300 cars. However, the traffic study included only 140 cars for the purpose of conducting the study, which was requested by the Alliance. Furthermore, the RDEIR assumes that Mussey Grade is a "rural highway", and that traffic will flow unobstructed, without cross-streets, without intersections, and without horse trailers or other trailers/RVs etc. all the way out of Mussey Grade Road and onto Route 67 **WITHOUT STOPPING**. There could be 300 cars at the Salvation Army facility. Alliance calculations show that these cars alone would take up over a mile of roadway and even a rough calculation shows that these cars could **add over an hour to the evacuation time of Mussey Grade Road**. The Army's fire plan argues that people could "Shelter-in-Place" at the conference center as a wall of flame passes through, so that Mussey Grade wouldn't be affected. ***Yet, now their traffic plan tells them that they are able to leave, so of course that will be what they prefer to do.*** I-9

- **The RDEIR fire modeling, which is the basis of the Salvation Army's "Shelter-in-Place" Fire Protection Plan, uses maximum wind speeds of 24-miles per hour, less than what was experienced during the Witch Fire.** Disaster planning dictates that "worst case" values should be used. Even **SDG&E's Sunrise Powerlink project**, which the Alliance has studied as part of our opposition and intervention into the California Public Utilities Commission proceedings, **uses 50-miles per hour sustained winds for their worst-case scenario.** I-10

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE "COVER LETTER," SIGNED BY DIANE CONKLIN, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment I-7: (cont'd.)
Please see RDEIR responses to comments D-2 and D-3.

Response to Comment I-8:
The County concurs with the comment that the 2003 Cedar Fire burned through the Mussey Grade Road area and burned a portion of the Salvation Army Camp site. The fire burned seven structures, not 90 percent of the facilities as stated in the comment. Due to the required fuel modification zones, use of ignition resistant construction materials, retrofitting of existing buildings and improvements to site infrastructure (roads and water supply), the wildfire risk from the project would be reduced compared to the existing site conditions. The proposed project includes significantly expanded fuel modification zones that would starve a wildfire of needed fuel. In 2003, this fuel was available to feed the wildfires. Wide fuel modification zones, designed to reduce fire intensity and eventually starve the fire of fuels by converting highly flammable fuels to low flammability fuels, will be in place around all structures. The project will also provide improved access and improved water availability, capacity and flow, along with other fire protection features detailed in the FPP.

Regarding the comment about the viability of the shelter-in-place strategy, please see RDEIR response to comment D-6. Therefore, even if hundreds of camp visitors did not evacuate, there should not be a "mass casualty event."

Response to Comment I-9:
Please see RDEIR response to comment IF-2.

Response to Comment I-10:
Please see RDEIR response to comment H-17 and Footnote 11 regarding wind speeds utilized in the Behave modeling conducted for the project.

Comment Letter I (cont'd.) 4

- **Criteria that are required for "same practical effect" as a prerequisite for the use of the "Shelter-in-Place" scheme have not been met**. In addition to not modeling worst case scenarios for the issues of traffic and fire, which is required by the county guidelines,[2] the emergency response times do not meet the county guidelines for "same practical effect". The original allowance signed by the Ramona Fire Department Fire Marshall predated the updates to the county fire code. I-11

We request that DPLU recognize the inherent dangers posed by the Salvation Army proposed expansion project to those who live along Mussey Grade Road. We also request that the DPLU note the complete inadequacy of the RDEIR concerning evacuation and wind speeds used in calculations to justify the project and reject the RDEIR until and unless: I-12

1) **a FULL and REALISTIC traffic study be done for proposed expansion project;**

2) **a realistic fire modeling be done that incorporates worst-case weather conditions, including appropriate Santa Ana wind speeds to calculate the safety of the "Shelter-in-Place" scheme to be used by the Salvation Army in case of catastrophic wildland fire; and** I-13

3) **emergency response times meet requirements of County code, or suitable mitigation is found.** I-14

We additionally request that the DPLU note the inadequacy of the RDEIR concerning biology issues and recognize that many of the most important biology comments from the Alliance's prior comments on the DEIR were not addressed. We further request that the DPLU reject the RDEIR until and unless the following biology issues are resolved: I-15

- The **focused surveys for all sensitive plant and wildlife species are outdated**, as they were conducted between 1999 and 2001. Current USFWS protocol surveys need to be conducted for listed wildlife species, and sensitive species surveys need to be conducted for all other wildlife species.
- Updated **rare plant species surveys still need to be conducted**. These surveys are particularly important for Encinitas baccharis and Lakeside lilac, which may not have been detectable in the closed canopy conditions that existed prior to the Cedar fire. Many rare plant species are more easily detected during post-fire conditions. I-16
- A **wildlife movement study based on field data collection has not been conducted**. The RDEIR and the Biological Technical Report claim to have done a corridor map analysis, however no results are reported and no field data or map analyses are presented to support the conclusions. The Alliance urges the DPLU to require a wildlife tracking study be conducted for purposes of a wildlife corridor analysis, or, alternatively, use the independent study conducted by the San Diego Tracking Team and submitted by the Alliance (attached). I-17

[2] See County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements; Wildland Fire and Fire Protection, Land Use and Development Group; Department of Planning and Land Use; Department of Public Works, March 19, 2007

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE "COVER LETTER," SIGNED BY DIANE CONKLIN, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment I-11:
It is not clear which criteria the comment is referring to. The requirement to prepare modeling based on worst-case scenarios is included in the County Wildfire Guidelines (March 19, 2007) in Section 5.5.1.2 when deciding whether to allow reductions in fuel modification zones. There is no proposal to reduce required fuel modification zones for the proposed project.

Regarding emergency response times, travel time to the furthest structure on site would be 7.45 minutes, which is less than the maximum travel time of 10 minutes as required by the County General Plan, Public Facility Element (FPP, page 12). It is unclear what "allowance" means in the comment.

Response to Comment I-12:
Please see RDEIR response to comment IF-2 regarding the evacuation scenario traffic analysis. Please see RDEIR response to comment H-17 regarding wind speeds used in fire modeling. Please see RDEIR responses to comments D-2 and D-3 regarding camp evacuation.

Response to Comment I-13:
Please see RDEIR response to comment H-17 and Footnote 11 regarding wind speeds utilized in the Behave modeling conducted for the project.

Response to Comment I-14:
The Project Availability Form (Appendix D) provided by the RFD Fire Marshal (June 2006) provides Fire Department input regarding response time. The form states that "Based on the capacity and capability of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. The expected emergency travel time to the proposed project is $4^{1/2}$ minutes."

The travel time stated in the Project Availability Form is based on the distance from the fire station to the camp entrance. The travel time standards in the Public Facilities Element of the General plan require the travel distance to be measured from the fire station to the farthest structure on the project site. The distance from Fire Station No. 82 to the farthest structure on the campsite is approximately 4 miles or 21,260 linear feet. Pursuant to National Fire Protection Association (NFPA) 1142 Table C.11(b), the travel time at 35 mph would be approximately 7.45 minutes. This project is in the Estate Development Area and the Rural Development Area Regional Categories. Pursuant to the table on page XII-11-11 of the Public Facility Element of the General Plan, the maximum travel time allowed is 10 minutes. (FPP page 12). Therefore, the travel time for this project complies with the General Plan.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE "COVER LETTER," SIGNED BY DIANE CONKLIN, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment I-15:
The County does not concur that the RDEIR is inadequate with respect to the biological analysis. Please see RDEIR responses to comments IB-1 through IB-45 which address each of the specific comments regarding biological issues. Furthermore, the County disagrees that the Alliance's prior comments on the DEIR were not addressed. Please refer to response to comments on the Draft EIR (Final EIR Valume B, response to comment letter J).

Response to Comment I-16:
Please see RDEIR responses to comments IB-1 and IB-2.

Response to Comment I-17:
The proposed project is the expansion of an existing campground. Design of the proposed facility is clustered in the eastern portion of the property adjacent to the existing campground, which allows for preservation of the western portion of the property. The Biological Report describes the methodology used for the corridor analysis and the results (Appendix B, page 15). Analysis using existing GIS data and general biological fieldwork is an acceptable methodology as described in the EIR. As discussed in the Final EIR (Section 2.2.1.4), the riparian and oak habitats in the project area, including those associated with the west fork of San Vicente Creek, and the ridgelines in the western portion of the project site serve as local wildlife corridors. As indicated in the EIR, field studies documented signs (e.g., tracks, etc.) of the on-site corridors being used by meso-predators, bobcat, coyote, and mule deer. While local wildlife corridors are identified and discussed in the EIR, the EIR states that neither the County MSCP Subarea Plan nor the Poway Habitat Conservation Plan/Natural Communities Conservation Planning (HCP/NCCP) Subarea Plan identifies a regional corridor on the project site. The project would not preclude or significantly inhibit continued wildlife movement through the property because the majority of the project site would be dedicated as permanent open space. Additional wildlife movement studies, including a wildlife tracking study, are not required. Please see RDEIR response to comment IB-3.

Comment Letter I (cont'd.)

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- **The RDEIR concludes erroneously and without evidence, as did the previous DEIR, that the Salvation Army property does not contain a habitat linkage** and is therefore exempt from the Design Criteria for Linkages and Corridors within the MSCP Findings of Conformance. I-18
- **The project alternatives continue to fail to meet the standards** necessary to conform to the BMO Project Design Criteria and Design Criteria for Linkages and Corridors, and to conform with the objectives of the County MSCP Subarea Plan. The project therefore, cannot be approved. I-19

Due to the serious concerns of the Alliance regarding material inaccuracies and deficiencies in the RDEIR in both the areas of wildland fire and biology, and the fundamental changes that would be necessary to correct these inaccuracies and deficiencies, the Alliance requests that the DPLU reject the RDEIR until and unless the fire and biology issues are resolved. If the application process proceeds and these problems are addressed, the Alliance further requests ***a recirculation*** of the **REVISED RDEIR** once the document has been amended I-20

Thank you for your consideration in this matter.

Sincerely,

/S/ Diane Conklin

On behalf of the
Mussey Grade Road Alliance

cc:
Joseph Farace, Planning Manager, Advanced Planning Division, DPLU
Dr. Glenn Russell, Co-Deputy Director, DPLU
Robert Krysak, President, Ramona Municipal Water District
Kristi Mansolf, Secretary, Ramona Community Planning Group
Mussey Grade Road Alliance Board Members

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE "COVER LETTER," SIGNED BY DIANE CONKLIN, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment I-18:
Pursuant to the BMO, a linkage is an area of land that supports or contributes to the long-term movement of wildlife and genetic material (County Code section 86.501 et seq.). Linkages have been mapped through the MSCP effort (SANGIS data layers for core resource areas and linkages). Such linkages are mapped south and east of the project site, but not within or near the project site. This mapping effort further indicates core resource areas east and west of the project site with a large swath of connecting core resource area habitat to the south of the site. This connectivity (in part through the San Vicente Open Space preserve) ensures east-west connectivity and may support long-term movement of wildlife and genetic material. However, due to the existing development, use, size, and topography of the Salvation Army project site, it would not support the level of movement necessary to contribute to "long-term movement of wildlife and genetic material." Therefore, even if the site were completely unavailable to wildlife (which would not occur with the project), there would not be a measurable change in genetic diversity or flow of regional wildlife populations.

Under the Reduced Project Alternative I, over 68 percent of the Salvation Army site is being preserved in open space. Over 395 acres of land on the Salvation Army site will remain available for wildlife movement and exchange of genetic material.

In addition, the project biological report, which supports the EIR, does not contend that the project is "exempt from the Design Criteria for Linkages and Corridors within the MSCP Findings of Conformance", only that certain criteria do not apply due to the lack of a linkage (County Code Section 86.505(a)(5)). Please see also RDEIR response to comment I-19, which discusses the Reduced Project Alternative's conformance to the BMO Project Design Criteria.

Response to Comment I-19:
The County disagrees with this comment. Although a linkage has not been identified within the project site, the Reduced Project Alternative I, the project now being considered, does conform to the BMO Project Design Criteria as discussed in the Final EIR (pages 2.2-20 through 2.2-23).

Response to Comment I-20:
The County disagrees that the EIR is inadequate or deficient with respect to the analysis of wildfire or biology issues. Therefore, fundamental changes to the EIR are not necessary, and the criteria for requiring recirculation under CEQA Guidelines section 15088.5 have not been met. Please see RDEIR responses to comments IF series and IB series below.

Comment
Letter IF

Mussey Grade Road Alliance Comments Regarding Wildland Fire and the Fire Protection Plan (FPP) Based on the Revised Draft Environmental Impact Report (RDEIR) of the Salvation Army; MUP 70-379W2; ER 98-14-023; Sch. No. 2000031058

Prepared by Joseph Mitchell, Ph.D., of M-bar Technologies and Consulting, LLC

Date: June 10, 2008

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I. GENERAL ISSUES

A. Occupancy and season

There are references in the RDEIR to a reduced number of occupants in winter months. For instance on p. 2.3-10, Section F.- Emergency Planning we find:

"*Although wildfires can occur any time of the year, they are more likely to become uncontrollable the period of September to February, coinciding with the Santa Ana winds. The proposed project accommodate 615 persons, but the typical Camp population during the period of September will be much lower, around 200 persons, as children would be in school during this period*"

All references to "typical" lower occupancy of the facility during the autumn and winter months should be removed from the RDEIR, unless the Salvation Army wishes to codify lower occupancy during this period as a condition of approval. As pointed out previously and repeatedly by the Alliance, the proposed build-out represents a major shift in the usage and capabilities of the present facility; there is no reason to assume that past usage patterns would continue to apply. As one of the few high-occupancy conference centers in eastern San Diego County,[1] there is the potential for high year-round occupancy, and from an emergency planning standpoint it is only prudent to assume that this will be the case unless it is not.

⇒ ***Full occupancy of the between 748 and 615 persons overnight suggested for the proposed expansion must be assumed for emergency planning and traffic impact purposes.***

IF-1

II. TRAFFIC, SAFETY, AND EVACUATION

A. Inadequacy of the bus evacuation plan under emergency conditions

The Army assumes that it can evacuate all visitors and residents of the facility under emergency conditions with two standard school buses. On p. 2.3-11, they state: *Round trip from the Salvation Army Divisional Camp site to the United Methodist Church and back takes approximately 12 to 15 minutes under normal conditions. At that*

IF-2

[1] In fact, even with the lower number of 615-person occupancy, the project would accommodate more overnight guests than any other facility in the San Diego County backcountry, with the exception of the Barona Casino hotel, which has an occupancy of some 800 persons.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, PREPARED BY JOSEPH MITCHELL, PH.D., M-BAR TECHNOLOGIES AND CONSULTING, LLC, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment IF-1:
The County does not agree that the RDEIR should be revised to remove all references regarding the typical lower occupancy of the facility during certain times of the year. The emergency planning for the proposed project is based upon on-site occupancy of 615 persons at full build-out. The assumption that camp population from September to February would be 200 persons is based on existing camp activity and the fact that the typical primary visitors to the camp are school-age children. Although, this assumption is stated in the EIR emergency planning in the FPP is based on site occupancy of 615 persons, not 200.

Response to Footnote 1:
Comment noted.

Response to Comment IF-2 and Footnote 2:
The County prepared the evacuation traffic analysis included in the RDEIR (2008) in an attempt to address concerns that camp operations would significantly impact area residents during an area-wide evacuation scenario. Following the release of the RDEIR (2008), the FPP has been revised to clarify the protocol that will be followed at the camp in the event of a wildfire.

If a major wildfire were in close proximity to the camp and relocation is not feasible, the shelter-in-place strategy would be implemented as explained in following excerpts from the FPP (Section 6.2, pages 43 through 45):

"Subject to input from Ramona Fire Department, Cal Fire, OES, or other fire officials involved in the Incident Command System, the following protocol will be followed at the camp:

The on-site fire safety coordinator will initiate relocation of the camp based on weather conditions, location of the wildfire, and Mussey Grade Road traffic conditions. Any wildfire in San Diego County will trigger a consideration for whether relocation is necessary.

Relocation will occur when it is determined that the wildfire is moving toward the Ramona area or when weather conditions indicate fire spread is likely (relative humidity of 20 percent or less, sustained winds of 35 mph or more and/or when the National Weather Service issues a Red Flag Warning) **AND** it can be confirmed that there is sufficient time for relocation.

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Response to Comment IF-2 and Footnote 2: (cont'd.)
Decisions regarding wildfire behavior and the time available before fire threatens the camp would be made by fire officials involved in the Incident Command. The on-site fire safety coordinator will communicate with Incident Command System for wildfire information.

If there are more than three hours available for relocation before the wildfire would threaten the camp, the on-site fire safety coordinator will implement relocation.

If there are between two and three hours available for relocation before the wildfire would threaten the camp, then the on-site fire safety coordinator will assess Mussey Grade Road conditions. If Mussey Grade Road is blocked or otherwise not flowing freely, then the shelter-in-place strategy would be implemented.

If there are fewer than two hours before wildfire may threaten the camp, there are 20 or fewer people on-site, Mussey Grade Road is open and flowing freely, and the local authority confirms relocation can proceed, relocation may be implemented.

Under all circumstances, if the on-site fire safety coordinator can not confirm with Incident Command how much time is available before a wildfire would threaten the camp, the on-site fire safety coordinator would implement the shelter-in-place strategy."

The Final EIR has been revised ta delete the evacuation traffic analysis for the following reasons. First, there is no standard methodology to analyze traffic conditions in an emergency scenario because there are many unknown variables that would affect the analysis.

These variables include, but are not limited to:

- The hourly demand (number of vehicles) that could be on the roadway at a given period during an evacuation (e.g., number of vehicles per household evacuating, number of households that do not evacuate or evacuated earlier).
- The hourly capacity (throughput) of Mussey Grade Road at a given period during an evacuation (e.g., the number of lanes available, and the amount of vehicles that each lane can be processed under varying conditions).

Comment Letter IF (cont'd.) 3

rate, the Camp staff, visitors and campers could be relocated within approximately 1 hour. This is repeated in the Fire Protection Plan on p. 47.

The evacuation planning is totally inadequate for two reasons: First, this plan does not accommodate the between 615 to 748-person potential overnight occupancy and, second, it is completely inappropriate to assume "open roads" during an emergency requiring evacuation of the facility. Significant traffic congestion has been observed on Mussey Grade and on SR-67 during recent wildfire disasters, and it must be assumed that this would be the case in future disasters as well.

B. Inadequacy of the traffic study

Traffic flow was covered in the 2005 submission of the Alliance on this project, and the Alliance remains concerned about traffic impacts in general. The proposed evacuation as described in the RDEIR potentially endangers the lives of everyone on Mussey Grade Road who lives to the south of this facility as discussed in our 2005 submission. IF-2 (cont'd.)

During Alliance discussions in 2006 with the Ramona Fire Marshal, who suggested that he could act as an intermediary with the applicant, the Alliance presented a number of "performance-based" requirements to help prevent adverse impacts to residents by the facility during a wildland fire emergency[2]. The *first* of these requirements read:

1. ***Any increase in Facility occupancy shall not result in a significantly increased evacuation time for any resident of the Mussey Grade corridor based on the most current population figures available (for all residents using Mussey Grade as an egress) during an emergency fire evacuation.***
   "Significant" is defined as greater than 5%.
   ...Verification: A traffic simulation of a "worst case" evacuation of the Mussey Grade corridor shall be performed and the worst-case delay time plotted as a function of additional vehicles injected by an Army Facility evacuation.

Based on communication with the Fire Marshal, the Alliance understood that this document would be communicated to the applicant; the Army's representatives have referred to it in public discussions, such as at the Ramona Municipal Water District (RMWD). The applicant has known that the Alliance has been concerned about evacuation during wildfire event and the possible adverse effects to residents for a long time. Therefore the Alliance assumed that with the release of the RDEIR revisions to the Fire Protection Plan (FPP) it would include an adequate traffic study. What the Alliance has found, however, is the opposite - the "traffic study" presented in the RDEIR is so inadequate as to be completely without value. Problems include: IF-3

[2] DRAFT Mussey Grade Road resident fire safety requirements; Joseph W. Mitchell, Ph.D. for the Mussey Grade Road Alliance; July 17, 2006. *Attachment B.*

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, PREPARED BY JOSEPH MITCHELL, PH.D., M-BAR TECHNOLOGIES AND CONSULTING, LLC, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment IF-2 and Footnote 2: (cont'd.)
Second, and most importantly, the FPP has been revised to provide clear protocol for evacuation. The updated protocol accounts for mandatory coordination with Incident Command System of the wildfire, available time to evacuate and mandatory assessment of the traffic conditions on Mussey Grade Road. Decisions regarding wildfire behavior and the corresponding time available before fire threatens the camp would be made by fire officials involved in the Incident Command System. If confirmation from a fire official cannot be made, the shelter-in-place strategy would be implemented.

The Alliance may suggest "performance-based" requirements, but the County is under no obligation to require the project to meet these requirements. With implementation of the shelter-in-place strategy, there would be no "increased evacuation time for any resident of Mussey Grade corridor" because in an emergency situation, where evacuation is not feasible, the occupants of the camp would shelter-in-place rather than evacuate. Moreover, the residents of the Mussey Grade area would also be able to shelter at the facility.

Response to Comment IF-3:
Please refer response to comment IF-2.

Traffic counts were updated in 2006, and the new volumes were reviewed and compared to the 2004 counts. The March 2006 peak hour counts were reviewed for the SR 67/Mussey Grade Road intersection. These counts show that the traffic volumes were actually slightly lower than the volumes counted in 2004 and used in the evacuation analysis. Since the lower 2006 volumes are consistent with the 2004 volumes, the analysis for the updated volumes would be consistent with the original analysis.

The Alliance may suggest "performance-based" requirements, but the County is under no obligation to require the project to meet these requirements.

- Traffic measurements were done in the Spring of 2004 - after the Cedar Fire – were conducted before all residents had moved back into the neighborhood.
- Rather than assuming full camp occupancy, the study uses ADTs to determine the load placed upon the road from the evacuation of the facility.
- The base case assumes a "steady state" condition of traffic flow rather than the conditions that arise during an emergency evacuation.
- No modeling or simulation was performed. Rather, the preparer simply looked up "rural highway" in a book and applied this to Mussey Grade Road, with a small weighting factor. It was assumed that traffic would flow uninterrupted as on a rural highway, at nearly the maximum capacity for that highway.
- No allowance was made for traffic merging from side streets, which will be the primary determinant of traffic flow. No intersection modeling was done, even for the 300-car queue from the Salvation Army facility.
- The study assumes that traffic will flow from Mussey Grade onto SR-67, without stopping, at the maximum flow rate of a rural highway.

IF-3 (cont'd.)

The results of this traffic study – that there is no danger of congestion on Mussey Grade Road during an evacuation – are referenced in the FPP at p.46. IF-4

These assumptions are completely erroneous and render the "traffic study" valueless. See discussion in more detail below. As a result, however, of the fallacious assumptions upon which the traffic study has been performed, the Alliance requests that:

⇒ ***The Salvation Army shall be directed to do a revised and comprehensive traffic study that fully models the effect of the evacuation of their expanded facility at the proposed full occupancy on the traffic flow on Mussey Grade Road, using appropriate software models and calculation techniques.***

⇒ ***As facility evacuation is the PRIMARY impact on Mussey Grade resident safety during a wildfire, the Draft RDEIR should be deemed inadequate and should be recirculated for comment after a proper traffic study has been completed.***

IF-5

1. Measurements of traffic flow were done at a time that does not represent current and future traffic flow.

On p. 2.3-12, the method for determining traffic volume on Mussey Grade Road is described: "*A 24-hour road tube count was done on Mussey Grade Road both north and south of Dos Picos Park Road on a weekday in June 2004. This traffic count captured the two-way traffic on Mussey Grade Road for 24-hours.*" IF-6

This traffic study was conducted in June of 2004, only eight months after the Cedar fire, which destroyed 60-70% of the residences of lower Mussey Grade Road, located south of Dos Picos Park Road. At the time of the survey, not all residents had returned. In particular, the Mussey Grade Village trailer park, which had sustained

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, PREPARED BY JOSEPH MITCHELL, PH.D., M-BAR TECHNOLOGIES AND CONSULTING, LLC, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment IF-4:
Please see RDEIR response to comment IF-2.

Response to Comment IF-5:
As stated in RDEIR response to comment IF-2, additional traffic analysis regarding an evacuation of the camp is not warranted neither is recirculation of the EIR.

Response to Comment IF-6 and Footnote 3:
Please see RDEIR response to comment IF-2. Regarding the reference to Appendix A in footnote 3, please see RDEIR response to comment IF-3.

5

significant losses during the fire, not only rebuilt but expanded its operation[3]. The number estimated from a measurement in 2004 is likely to be much lower than the current number of ADTs.

⇒ ***A traffic flow study should be repeated now that the neighborhood has rebuilt.***

IF-6 (cont'd.)

2. An incorrect method is used to determine the number of cars emerging from the Salvation Army facility

The RDEIR describes the method used to determine the number of cars that would exit the facility during evacuation on p. 2.3-12: "*The project is calculated to add a maximum of 275 ADT to Mussey Grade Road, or about 140 one-way trips.*"

The use of ADTs to calculate an evacuation scenario for the Salvation Army facility is ***completely incorrect.*** ADTs were calculated using what is anticipated to be the typical usage scenario for the facility, with guests arriving on the weekends and reduced traffic during the week. Weekly ADTs are an average, and represent the weekend peaks in traffic flow averaged with the lower flow rates during the week. ***For this reason, ADTs* CANNOT *be used to correctly estimate camp occupancy.*** Additionally, this is incorrect because there is a much more accurate method to estimate vehicle occupancy: simply assume that all parking spaces are filled. The proposed project is calling for a total of 300 parking spaces, 188 dedicated spaces and 112 overflow spaces. The number 300 should be used for any evacuation planning.

⇒ ***A realistic evacuation scenario for the Salvation Army facility MUST assume that at full occupancy all available parking spaces are occupied, and that all of these vehicles will exit the facility onto Mussey Grade Road.***

IF-7

3. Modeling an evacuation as a smoothly flowing highway and ignoring ingress/egress effects is grossly inadequate

To do the "analysis" required for evacuation, the preparer of the traffic study simply looked up numbers in a book and assumed that the historic winding Mussey Grade Road, a dead-end country road, is a straight and smoothly flowing two-lane highway. We see on p. 2.3-13:

"*Several sections of the nationally accepted Highway Capacity Manual (HCM) were reviewed for information. The published HCM is the basis of the majority of the methodology used in signalized/unsignalized intersection calculations, arterial analyses, freeway analysis and two-lane highway calculations.*"

"*A commonly accepted hourly capacity for a single two-lane highway lane is 1,700-passenger cars/hour (pc/h). This is confirmed in the HCM. For the purposes of this*

IF-8

[3] See Appendix A, attached, letter from Ken and Joanne Gamble, Mussey Grade neighborhood residents who personally attest that traffic density was significantly lower in early 2004. Other residents, including the author and his wife, Diane Conklin, concur in this observation. There was a very significant increase that we noticed in traffic between early 2004 and the present.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, PREPARED BY JOSEPH MITCHELL, PH.D., M-BAR TECHNOLOGIES AND CONSULTING, LLC, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment IF-7:
Please see RDEIR response to comment IF-2.

Response to Comment IF-8:
Please see RDEIR response to comment IF-2.

analysis, Mussey Grade Road is considered to exhibit characteristics more similar to a 2-lane highway than an urban arterial. The latter carries higher volumes and has signalized cross streets. There are relatively few driveways and intersections along Mussey Grade Road as compared to a typical urban two-lane County roadway. Also, roadway "friction" in terms of opposing vehicles (i.e. southbound vehicles) under evacuation scenarios will be minimal with all outbound traffic heading northbound in one lane. However, given the narrower lanes and lack of shoulder as compared to a proper 2-lane highway, the two-lane highway lane capacity by 20%, resulting in an hourly, per-lane capacity of 1,360 pc/h."

"...The peak hour evacuation volumes calculated for Mussey Grade Road are 810 pc/h without the project, and 950 pc/h with the project. The hourly capacity of the road is conservatively estimated at 1,360 pc/h, with factors such as narrow lanes and lack of shoulders accounted for. Thus, the expected volumes are within the capacity either without or with the project. When the retreat at the project site is not operating (when it is not occupied), the project volumes are much less, since two busses will be on-site at all times for evacuation purposes." [Emphasis added]

IF-8 (cont'd.)

This approach ignores the fact that because there are a limited number of access roads onto Mussey Grade, those that exist will function as intersections in a mass evacuation. These will be heavily used, and will constitute an obstruction that will limit traffic flow. In fact, the Salvation Army entrance will be the *primary* intersection controlling traffic flow along Mussey Grade Road. This study conducts no intersection calculations whatsoever but simply assumes that traffic continuously flows along Mussey Grade Road unimpeded to Highway 67.

Using highway capacity to predict delay times is completely inappropriate for an evacuation scenario. The Highway Capacity Manual, cited as the reference for the traffic estimate, notes that simple calculations only apply to steady-state conditions and should not be applied under extraordinary conditions: *"the **Highway Capacity Manual (HCM) methods are generally not appropriate (unless the analyst performs a special intervention) for the evaluation of inclement weather conditions, accidents, or construction activities, queues that are building over both time and space**... However some guidelines are identified in Chapter 22 to address these conditions."*[4] [Emphasis added] Chapter 22 of the HCM refers to computer modeling methods. A wildland fire situation, with its associated smoke, falling embers, and panic, would not be appropriate for application of Highway Capacity Manual methods as per its own instructions for use.

IF-9

As stated in previous RDEIR comments, evacuations during the Cedar Fire caused traffic along Mussey Grade Road to grind to a halt. According to an eyewitness account given during the RMWD Cedar fire hearings[5], the traffic speed at 7:30 a.m. on

[4] Transportation Research Board; Highway Capacity Manual; HCM2000; Washington, D.C.; www.TRB.org; p. 9-1.
[5] Ramona Municipal Water District Cedar Fire Hearings, January 2004. http://www.musseygraderoad.org/CedarIndex.htm ; also available in original audio format from the Ramona Municipal Water District, 105 Earlham Rd., P.O. Box 1829, Ramona, CA 92065, USA. The transcript of this section is attached as Appendix C.

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Response to Comment IF-9:
Please see RDEIR response to comment IF-2.

Mussey Grade road was some three miles per hour. Perhaps not coincidentally, this is the time at which 100 campers were evacuated from the Salvation Army compound. IF-9 (cont'd.)

A simple calculation demonstrates that using maximum highway capacity is incorrect for determining traffic flow rates during an evacuation. Note that this is a simplified assumption ***and should not form the basis of actual modeling used for this study***. This is presented simply to illustrate the inadequacy of the analysis contained in the RDEIR. IF-10

Assuming 800 vehicles are evacuating over a one-hour period would mean one vehicle would pass every 4.5 seconds at an even flow rate. This is not enough time to allow merging of vehicles from side streets; traffic would have to slow or stop to allow evacuating vehicles to enter the Mussey Grade. If 300 additional vehicles enter near the northern end of the road – the location of the Salvation Army camp – and is allowed to merge with traffic traveling northerly on Mussey Grade, each vehicle will need to come to a stop to permit another vehicle to exit. Assuming that each vehicle takes seven seconds to get through this as all-way stop at the Salvation Army, this would mean 14 seconds per pair of cars. Therefore, an unavoidable traffic jam would propagate up Mussey Grade Road as the waiting time is significantly longer than the mean time interval between cars. Assuming a separation of 20 feet per vehicle, the maximum length of this traffic jam would be 16,000 feet, or three miles – nearly to the end of Mussey Grade Road. The time for the 300 cars to be cleared out of the Camp at 14 seconds per pair would be 70 minutes. Hence the evacuation of the Salvation Army Camp at full occupancy could be expected to add over an hour of additional time required for those evacuating from southern Mussey Grade Road. IF-11

A consistent estimate can be derived from the Highway Capacity Manual. For an all-way stop intersection and assuming base conditions, it can be assumed that 170 vehicles per hour per approach to achieve Level of Service A, but only 350 vehicles per hour per approach for LOS E[6]. This assumes only 10% left turns, versus the 100% we would expect from the Salvation Army facility, which would be expected to further degrade performance.

⇒ ***Baseline assumptions for direct use of Highway Capacity Manual calculations are NOT met during an emergency wildland fire evacuation, and so planning must be based on appropriate software modeling. As per previous Alliance requests, a full simulation of traffic flow during an evacuation of Mussey Grade Road needs to be performed as part of this RDEIR. This study should model the traffic flow under emergency conditions using a set of realistic assumptions. The traffic study as presented is completely inadequate, and should not be accepted by the County.***

⇒ ***"Good Samaritanism" shall be assumed for modeling traffic on Mussey Grade – in other words that as traffic rates slow and queues or platoons***

[6] HCM2000; p. 10-35.

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Response to Comment IF-10:
Please see RDEIR response to comment IF-2.

Response to Comment IF-11:
Please see RDEIR response to comment IF-2.

form, residents will allow side traffic to merge. Practically, this means that the Salvation Army exit will be regarded as an all-way stop.

⇒ *Traffic modeling will be done for different timing of Salvation Army evacuation with respect to the neighborhood as a whole.*

IF-11 (cont'd.)

4. Assuming egress onto SR-67 at full highway flow rate during an evacuation is a grossly unrealistic assumption.

On p. 2.3-13, the RDEIR states that:

"*The evacuation of Mussey Grade Road and other similar roads in the County rely on the expeditious movement of traffic from the minor street to the major street. That is, if traffic congestion on SR-67 precludes the movement of vehicles from Mussey Grade Road on to SR-67, then capacity may be reduced below what is presented in this analysis. However, emergency personnel would be responsible for directing traffic at key intersections, such as SR-67/Mussey Grade Road, during an emergency so that an orderly and expeditious evacuation flow could occur.*"

The assumption that SR 67 will be completely open to accept traffic flow off of Mussey Grade Road is completely unrealistic. In fact, with the current "Reverse 9-1-1" system and fire agency practice, large areas are simultaneously evacuated which puts tremendous pressure on traffic arteries and significantly slows traffic. This was observed during the evacuation of Ramona during the Witch Fire. IF-12

A quick calculation for this case can be done as well. Once again, this calculation is illustrative and does not preclude the need for a full traffic flow simulation for the evacuation of Mussey Grade.

Assume that the capacity of SR-67 is one vehicle per 3 seconds, and that due to evacuation it is at capacity. While traffic direction might be occurring, it is unlikely that a single feed road such as Mussey Grade would be given significantly more access than the main trunk. Let us assume that 1/5 of the capacity of SR-67 is dedicated to Mussey Grade Road during the evacuation. This means on the average, four vehicles per minute can turn onto SR-67. Total evacuation time for 1,100 vehicles at this rate would be 4½ hours! The traffic jam for 1,100 vehicles assuming 20 feet per vehicle is 4.2 miles – almost the full length of Mussey Grade Road.

Under this assumption, the delay for someone at the rear of the line added by the 300 vehicles evacuated by the Salvation Army facility would be 75 minutes. The linear distance the Salvation Army traffic would add to the traffic jam would be over one mile. The "safe area" of Mussey Grade extends from SR-67 down to Dos Picos Park Road, approximately one mile, at which point dense vegetation begins and extends the remaining length of the road. The Salvation Army facility is roughly one mile south of Dos Picos Park Road. Hence, evacuation of the facility would cause significant additional exposure of residents south of the facility to vegetation which could be deadly in the case

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Response to Comment IF-12:
Please see RDEIR responses to comments IF-3 through IF-11 regarding the assumptions used, and adequacy of, the evacuation analysis.

Comment Letter IF (cont'd.)

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of an encroaching fire.

⇒ *A traffic study should be performed that assumes a widespread evacuation and uses realistic modeling of the effect this would have on people trying to evacuate from Mussey Grade Road, and should include congestion on SR-67, which is the sole egress from the area. Under no circumstances should it be assumed that any more than ¼ of the capacity of SR 67 be taken up by vehicles evacuating from Mussey Grade Road.*

⇒ *Under no circumstances should expansion of the Salvation Army parking be permitted beyond what is CURRENTLY in place during fire season from September through March unless it can be shown that there are no impacts on resident evacuation using realistic traffic models. Parking sufficient for current Camp occupancy should be paved, and off-pavement parking during fire season should be considered a permit violation.*

IF-12 (cont'd.)

III. FIRE AND THE FIRE PROTECTION PLAN (FPP)

In RDEIR comments to date, and in other requirements shared with the RMWD, the Alliance has generally not intervened in on-site safety considerations. It is the responsibility of the Salvation Army to keep the guests at its facility safe, and while the Alliance has made comments on site issues for humanitarian reasons in general we've not been directly involved in issues that don't affect the community outside of the facility. With the most recent FPP, however, which offers the concept of a large – oversized – facility with capacity for 1,300 people that the Salvation Army has offered to shelter neighborhood residents, we now feel an obligation to participate in these discussions as well, since some residents for various reasons might feel that this would be a good option for them in a wildland fire emergency. Therefore, it is incumbent on the Alliance to now provide feedback to improve fire safety for on-site facilities.

IF-13

A. Shelter-in-Place

The Fire Protection Plan designates the Salvation Army facility as a "Shelter-in-Place" environment, using recent changes to County fire codes to allow this to occur. This has always been a somewhat schizophrenic definition, as noted in both the County fire code and in this Fire Protection Plan (p. 36): "*in case of fire, the preferred plan is relocation, assuming that sufficient time is available to relocate staff and visitors without impacting Mussey Grade Road.*" As shown in the (grossly incorrect) traffic study in the RDEIR, *no* impact is anticipated for a full-scale evacuation of the facility – hence the decision will inevitably be to evacuate. We can assume that both the camp management and the Ramona Fire Department will be operating under the same mistaken assumption of a minimal impact to Mussey Grade Road, should the traffic study in the RDEIR be accepted. This could lead to disastrous consequences.

IF-14

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Response to Comment IF-13:
Comment noted.

Response to Comment IF-14:
Please see RDEIR responses to comments IF-2, D-2 and D-3.

Comment Letter IF (cont'd.) 10

Even assuming that a sheltering strategy was to be employed, there are a number of factors that would put visitors, staff, and neighbors at risk. These arise both from general problems in the County's concept of "Shelter-in-Place" and from more specific problems with this facility itself. IF-15

1. Shelter-in-Place as envisaged by the County is not practiced elsewhere

A key difference between Australia, where sheltering during wildland fire is accepted practice, and San Diego County's implementation of Shelter-in-Place is that the Australians assume that the remaining residents take an active role the prevention of structure ignition. The theory underlying this approach is that structures with sufficient separation from hazardous vegetation will provide good protection of sheltering residents from heat and flame. However, structures are susceptible to ember attack, especially after the flame front has passed. Residents are expected to patrol for embers and secondary ignitions once the heat levels have dropped, and extinguish them.[7,8] The San Diego Shelter-in-Place (SIP) strategy, on the other hand, relies entirely on the capability of a properly designed structure to withstand ember attack or the presence of firefighting personnel.[9] While structures can be designed to be highly resistant to ember penetration, a variety of contingencies might still occur which would compromise the structure and allow ignition:

- Windows can be left open
- Maintenance or repair can leave segments of the building exposed
- Gale-force winds may cause damage and allow ember entry
- Embers can penetrate into unanticipated vulnerabilities, such as under roof tiles[10].

IF-16

There is an internally inconsistent element in the County's SIP standards, as can be clearly seen in the quotation used on p. 36 of the FPP:

"While these standards will provide a high level of protection to structures in this development, and should reduce or eliminate the need to order evacuations, there is no guarantee that compliance with these standards will prevent damage or destruction of structure by fire in all cases."

So what if the "case" in which a structure is damaged or destroyed is the case of an ***occupied*** structure? The Australian method for dealing with this contingency is two-fold:

[7] Webster, Joan; The complete bushfire safety handbook; Random House Australia; Sydney; 2000.
[8] Country Fire Authority; Community fireguard – guidelines for groups; Erwins Printing, Dandenong, VIC, Australia; 2004. . http://www.cfa.vic.gov.au
[9] Mitchell, Joseph W.; Playing with fire – the county's Shelter-in-Place gamble; San Diego Union-Tribune; May 2, 2007; p. B7.
[10] Mitchell, Joseph W. and Oren Patashnik; Firebrand Protection as the Key Design Element for Structure Survival during Catastrophic Wildland Fires; Fire and Materials 2007, San Francisco, Jan. 2007. Available at: http://www.mbartek.com/FM07_FirebrandsWildfires_1.1F.pdf

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Response to Comment IF-15:
Comment noted. Please see RDEIR response to comment D-6 and responses below.

Response to Comment IF-16:
The County disagrees with the comment that "shelter-in-place as envisaged [*sic*] by the County is not practiced elsewhere." In fact, shelter-in-place is practiced statewide. The most recent example is Westmont College. Please see RDEIR response to comment D-6.

As stated in the FPP, the on-site structures will have "sufficient separation from hazardous vegetation." See the FPP, Section 5.0 Fire Safety Requirements (beginning on page 21) for a complete description of the proposed fuel modification zones. In addition, please see Section 5.3.1 Ignition-Resistant Structural Requirements (beginning on page 34) for a complete list of construction requirements for the proposed project.

In response to this comment and to further ensure the safety of the shelter-in-place occupants, the FPP has been revised to include the following requirements (see pages 34-36 and 42 of the FPP):

1. Staff will be trained in safe techniques to patrol for embers and secondary ignitions once the heat levels have dropped.
2. Staff will be trained to ensure that all windows in the multi-purpose room (the designated shelter-in-place facility) are closed during a wildfire emergency to protect the structure.
3. Ignition-resistant construction elements must be maintained at all times.

The comment next quotes the FPP as follows: "While these standards will provide a high level of protection to structures in this development, and should reduce or eliminate the need to order evacuations, there is no guarantee that compliance with these standards will prevent damage or destruction of structure in fire *in all cases [emphasis added]*." The comment claims that this statement is internally inconsistent. This statement is common sense. The safety features in the FPP are based on provisions of the 2009 Consolidated Fire Code. These safety features have proven highly successful and are the best available practices based on fire expertise gained from experience with wildfires in Southern California. However, the sentence quoted above was added because all risks associated with wildfire emergencies cannot be anticipated.

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Response to Comment IF-16: (cont'd.)
The County disagrees that the success of the shelter-in-place strategy relies "entirely on the capability of a properly designated structure ...or the presence of firefighting personnel."

The shelter-in-place strategy relies on more than just the design of the structure or presence of firefighting personnel. The combined fire protection system includes but is not limited to the following measures:

- An Evacuation and Fire Safety Plan (including buses and vans).
- A Shelter-in-Place (SIP) Facility, the multipurpose building, for use during wildfire emergencies to be used in the event that a safe evacuation is not feasible.
- Customized fuel modification zones around all structures with a minimum two times and up to 20 times the width of predicted flame lengths heights (minimum of 100 feet to a maximum of 175 feet).
- All structures will include ignition-resistant construction materials and interior sprinklers.
- Improved water availability and fire flow for the camp and throughout the Mussey Grade area by constructing a 650,000-gallon public water tank on site (expandable to 800,000 gallons).
- Improved fire department access (i.e. internal road widening and paving).
- Employing a Fire Safety Coordinator to work with RMWD Fire Services.

During a wildfire, emergency personnel will try to reach the shelter-in-place facility. As stated previously, the proposed fuel modification along the interior roads should be adequate to allow emergency personnel and equipment to utilize the roads during a wildfire. However, if emergency personnel cannot reach the shelter-in-place facility, the occupants would still be safe. The primary shelter-in-place structure (the multi-purpose building) would include extended fuel modification zones up to 175 feet (six times predicted flame lengths) to the northeast, the side exposed to the wildlands. The FPP also requires ignition-resistant construction, interior sprinklers, and on-site training regarding wildfire emergencies and the shelter-in-place strategy. Additionally, the Fire Safety Coordinator will work at the direction of the RMWD Fire Services to train camp staff to implement fire safety measures at the shelter-in-place structures.

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Response to Comment IF-16: (cont'd.)
Examples include window checks to ensure that windows are closed and safe techniques for patrolling the grounds post-fire to identify and extinguish embers and secondary ignitions. The primary shelter-in-place structure will include the following additional amenities:

- Several large-panel televisions to track newscasts during a wildfire event
- Computers capable of tracking wildfire incident status and communication
- Back-up battery power
- Second utility source or back up diesel generator
- Emergency preparedness kits to make brief shelter-in-place stay as comfortable as possible including medical related equipment (i.e. supplemental oxygen, pain relievers, inhalers, etc.)

Regarding the remaining contingencies that the comment states would potentially compromise the structure, the County disagrees. The fact that "gale force winds may cause damage and allow ember entry" is mitigated by the "Ignition-Resistant Structural Requirements" as outlined in Section 5.3.1 of the FPP. This section outlines the ignition-resistant construction (for all structures) that will meet the requirements of the 2009 Consolidated Fire Code. Specifically, the comment states that "embers can penetrate in unanticipated vulnerabilities, such as under roof tiles." The FPP requires that (pursuant to California Fire Code and California Building Code): "All roofs shall be a Class "A" listed and fire-rated roof assembly, installed per manufacturer's instructions, to approval of the Fire District and the DPLU. Any openings on ends of roof tiles shall be enclosed to prevent intrusion of burning debris. When provided, roof valley flashings shall not be less than 0.016-inch corrosion-resistant metal ..."

The FPP, with its extensive fuel modification zones, ignition resistant building materials and fire suppression systems should protect occupants under virtually every circumstance. Despite these precautions, if a portion of the building were to ignite and not be controlled by the sprinkler system, the people in the shelter-in-place structure may go outside. This would be the logical reaction; however, in most fire emergency circumstances, the guests would remain in the shelter-in-place structure until conditions are safe to leave the structure.

- People who shelter are fully aware that the prevention of structure ignition is *their* responsibility, and they are equipped and prepared to take actions to put out ignitions that threaten the structure.
- In the case that a fire gets out of hand, they will "just step outside"[11]. This relies on the timing of wildland fire. The passage of a fire front is extremely rapid, and will seldom last more than 15 minutes. Most structures – especially those with defensible space and good vegetation management – ignite *after* the passage of the front. Furthermore, it takes time for the ignitions to grow to the point where occupants are threatened, and by this time the external fires will have abated.

IF-16 (cont'd.)

Neither of these measures would seem to be practical for the Salvation Army's proposed SIP structure, nor is either one part of San Diego's "Shelter-in-Place" program. There is no provision for training Army staff in firefighting techniques, and the presence of potentially 1,300 sheltering guests precludes rapid evacuation.

Another important element of Australian guidelines is the emphasis that only able-bodied and healthy adults should remain in the area of a wildland fire. The elderly, infirm, and children are recommended for early evacuation – preferably even before the fire starts, when hazardous fire weather conditions are present. In fact, two studies of the psychological impact of wildland fire on children have been conducted in Australia.[12,13] These indicate that over 10% of children experiencing a wildland fire close hand will experience severe, long-lasting, and debilitating post-traumatic stress effects. Additionally, the effects of smoke, heat and stress on visitors with health conditions could lead to casualties.

IF-17

Finally, during the recent October Firestorm of 2007, mass evacuation of Ramona was ordered by the authorities. No exceptions were made. In the case of the Salvation Army, it could be expected that a mass evacuation order, if given, will apply to the facility and therefore evacuation will be subject to direct order with legal consequences for noncompliance. Therefore, the proposed "Shelter-in-Place" scheme put forward by the applicant may actually never be used and instead the residents of Mussey Grade Road south of the facility would be impacted in a catastrophic wildland fire event by evacuees leaving the facility

IF-18

2. The safety of current fire codes is overstated

On p. 24 of the FPP, the authors state that: "*A very low percentage of homes (3%) build according to 2001 or newer codes were lost in the County during the Cedar fire. Maintenance facilities on-site are metal-sided and fire proof.*"

IF-19

[11] Harrap, Keith; Asst. Commissioner AFSM; Evacuation – Strategic withdrawal or abandoning the community; Wildland Fire 2004; March 3-5; Reno NV; *during oral presentation.*
[12] McFarlane, A.C.; Posttraumatic Phenomena in a Longitudinal Study of Children Following a Natural Disaster;Journal of the American Academy of Child and Adolescent Psychiatry; 26, 5:764-769; 1987
[13] McDermott B.M. , Lee E, Judd M, Gibbon P; Posttraumatic Stress Disorder and general psychopathology in children and adolescents following a wildfire disaster; Canadian Journal of Psychiatry 2005;50:3 137-143.

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Response to Comment IF-17:
The County concurs with the comment that there are inherent risks to all occupants of the proposed project, not just the elderly, infirm and children. Again, the preference would be to evacuate the camp if an evacuation could be accomplished safely.

The County does not dispute the negative psychological impact a wildland fire experience may have on children; however, this is a social issue that need not be analyzed under CEQA.

Finally, the County does not dispute the negative effects of smoke, heat and stress that would be caused by experiencing a wildfire event. As explained in the FPP, page 42, the shelter-in-place facility will include the following features to help address these potential negative effects:

- Several large-panel television monitors located where those interested may track newscasts during a wildfire event;
- Large computer monitors and capable computers for tracking fire incidents status
- Several computer terminals available for communicating via email;
- Back-up power –battery banks
- Second utility source or back up diesel generator; and,
- Emergency preparedness kits to make brief shelter-in-place stay as comfortable as possible and including medical related equipment (i.e. supplemental oxygen, pain relievers, inhalers, etc).

Response to Comment IF-18:
In October 2007, there was no shelter-in-place facility at the Salvation Army camp. If the proposed project is approved, the shelter-in-place facility would be built. The local fire authorities would be fully aware of the shelter-in-place capabilities of the Salvation Army camp because the RMWD Fire Services reviewed and accepted the revised FPP which includes the shelter-in-place strategy. In addition, the RMWD Fire Services will inspect the camp fire safety features annually and will train the camp's Fire Safety Coordinator. During a wildfire emergency, local fire authorities would be in direct communication with the Fire Coordinator at the Salvation Army Camp. Therefore, a mandatory evacuation of the camp would not be made without considering the shelter-in-place option at the camp. Where shelter-in-place facilities exist, such as

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Response to Comment IF-18: (cont'd.)
Rancho Cielo, etc. fire authorities directed residents to shelter-in-place rather than evacuate.

Please see RDEIR responses to comments D-2 and D-3.

Response to Comment IF-19:
The reference to only 3 percent of homes built according to 2001 or newer codes is correct. It was calculated from the 2007 Firestorm Damage Assessment, and the DPLU GIS system was used to compare that data with all homes within the fire perimeter. This statement is not intended to imply that 97 percent of the homes built with the new ignition resistant construction codes will survive an extreme fire exposure. The point is to show that homes built under current codes have a lower loss rate than the norm and that compliance with newer codes increases a structure's ability to survive a wildfire. For instance, the overall loss rate in the 2003 wildfires was 17 percent versus the 3 percent loss rate of homes built according to 2001 codes.

In addition, the following information from the Institute for Business and Home Safety's Report "Mega Fires: The Case for Mitigation 2008" supports the proposition that new building code reduce the likelihood that structures will be damaged by wildfires:

- Of 15,000 total structures within the Cedar Fire perimeter, 17 percent were damaged or destroyed.
- Of the 400 structures built using the 2001 building codes, only 4 percent were damaged or destroyed by the Cedar fire.
- Of 8,300 structures within the fire perimeter of the Witch Creek Fire, 13 percent were damaged or destroyed.
- Of 789 structures built using the 2001 building codes, only 3 percent were damaged or destroyed.
- Of the 1,218 structures built using the 2004 building codes, only 2 percent were damaged or destroyed.

The Building Code was updated again in January 1, 2008, and the revised FPP uses the updated code as the standard for construction of the Salvation Army structures. The updated code specifically addresses ember penetration, and compliance with the updated code will further reduce the risk of structural ignition from the already low rates experienced for homes built after 2001.

The 3% value often stated for homes lost in the Cedar fire is a specious (though common) use of this statistic. It has never been published in a peer-reviewed journal or formally analyzed and its use in this manner is deceptive. The overall pool from which this value was determined has never been properly defined. Three per cent of all homes in the County? Three per cent of homes in the fire perimeter? Three per cent of all homes exposed? If it is used to imply that 97% of homes built with 2001 or newer codes will survive extreme fire exposure, this would be a very dangerous and very likely incorrect assertion. IF-19 (cont'd.)

One example that is completely inconsistent with this assertion would be the case of Mahogany Ranch Road, which is directly across Mussey Grade Road from the Salvation Army facility. This was a new development in 2003, with homes constructed under the new fire codes, all of which had mandated defensible space perimeters. Roughly half of the completed homes were destroyed in the Cedar fire, not significantly different from the 60-70% loss rate in the neighborhood as a whole. From a statistical standpoint, it is virtually impossible that this would be an "accidental" fluctuation from a 3% base probability. IF-20

3. Site location is not ideal for safe resident evacuation

On p. 6 of the FPP, the Salvation Army offers the Shelter-in-Place facility as a community resource:

"Mussey Grade Road area to benefit from the surplus of available shelter, and they would be welcome to temporarily relocate to this structure during a wildfire emergency." IF-21

A wildfire shelter facility for lower Mussey Grade Road might be useful, but the facility is located near the northern end of the at-risk area. Residents who have evacuated as far as the Salvation Army entrance are almost out of the danger area, and driving into the camp facility would expose them to further risk.

The SIP structure is nearly a mile by road from the Primary Access of the camp. The Map in Appendix E of the FPP clearly demonstrates that nearly 1,500 feet of this distance is within 100 feet of hazardous vegetation. Hence, this would not be a recommended escape route unless there was no immediate threat of being overrun by fire. If traffic entering the facility were to become backed up or blocked under wildland fire conditions, a mass casualty event could result. Comparing this with Appendix C of the FPP shows that the camp entrance is only about one mile from the more developed northern area of Mussey Grade Road which has much less native vegetation and presents significantly less fire risk. Therefore, the better choice for an evacuee who has made it as far as the Salvation Army facility entrance would be to continue northward and leave the area entirely. IF-22

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Response to Comment IF-20:
The comment provides no substantiation for the loss rates, the type and size of fuel modification zones that were required, whether the fuel modification zones were maintained, the condition of the structures, or if regular inspections and enforcement were provided. The County was unable to verify the facts stated in the comment. However, the damage assessment for the 2003 Cedar Fire lists three homes that were burned on Mahogany Ranch Road. It is likely that maintenance the fuel modification zones were not properly maintained.

Even in shelter-in-place communities built to the latest code, maintenance and inspections of the fuel modification zones is critical to keep them properly functioning. In the absence of an inspection and maintenance program, losses would be expected. The Salvation Army project would include a Fire Safety Coordinator who would be responsible for ensuring that fuel modification zones would be properly maintained. In addition, the Salvation Army must obtain an inspection and report from the RMWD Fire Services in May of each year certifying that vegetation management activities throughout the project site have been performed pursuant to the FPP.

Response to Comment IF-21:
The comment is correct in that a Shelter-in-Place facility would be of more beneficial if it were located further south on Mussey Grade Road. However, the County does not agree that the proposed on-site facility would not be a community resource. If evacuation to the north is not possible (e.g. road blockage due to trees, accident or approaching fire), RMWD Fire Services and/or firefighting personnel would have the option to direct residents to the on-site shelter-in-place facility. That option does not exist today nor is a facility proposed further south. Using the shelter-in-place facility would be preferable to sitting in an exposed vehicle on Mussey Grade Road.

Response to Comment IF-22:
Comment noted. Please see RDEIR response to comment IF-21.

Comment Letter IF (cont'd.) 13

In the event that a large number of residents decided to shelter at the facility, there will need to be a plan that would accommodate additional parking, assuming that the facility was at full occupancy and that the parking lot already contained 300 vehicles of Salvation Army guests. In order for this facility to be safely advertised as a shelter for the neighborhood, it needs to clearly specify how many extra vehicles the facility could accommodate under emergency conditions and where these vehicles would park. IF-23

A shelter facility specifically designed *for* Mussey Grade Road residents would ideally be located further south, where it would be more readily accessible to the bulk of the community. Relocation to the Salvation Army facility would only be a good recommendation in the case of total blockage of the Mussey Grade Road egress. Even then it would only be advisable for 1) people who do not have defendable structures or 2) family members incapable of helping to defend a residence during wildland fire. IF-24

Some Mussey Grade residents might intend to shelter at the facility and then return to defend their homes after the passage of the fire front, since local experience has demonstrated that many homes burn long after the fire front passes (a result fully consistent with wildland fire science). It should be made clear to people who might use the facility for sheltering that access roads to the facility and Mussey Grade Road itself are in oak-riparian areas, and that when oaks burn they can burn hot for a long time, so it cannot be assumed that it will be possible to safely exit the facility until long after the fire has passed through. Vehicle survival also cannot be assumed. IF-25

Suggested plans for offering the Salvation Army proposed expanded facility as a neighborhood "Shelter-in-Place" destination ignore the reality of wildland fire conditions for this area and the attendant traffic and other risks that would result. Even if a plan is developed for accommodating hundreds of additional vehicle and provisions are made to restrict movements of evacuees once at the facility, there would be no assurance that additional traffic problems would not ensue and at the same time Mussey Grade Road residents would still be subject to the same risks posed to facility guests and which are considerable. IF-26

⇒ ***The Salvation Army facility should not be proposed as a neighborhood evacuation point in the FPP unless all problems are adequately addressed, including provision for additional parking of hundreds of vehicles.***

B. Assumptions about fire conditions

1. Inadequate wind values were used for fire modeling

Fire modeling using FlamMap was performed for the facility, and the results are presented on pp. 22-23 of the FPP. However, it uses only values of 12 mph, 18 mph and 24 mph for wind speed in the calculations of flame lengths and safety zones. This range of values is not adequate to deal with Santa Ana wind conditions expected over the lifetime of this facility. IF-27

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Response to Comment IF-23:
While the proposed project would provide 300 parking spaces, these parking spaces are to accommodate special events, and are provided by using areas not permanently designated for parking (e.g., such as certain ball fields). Ample additional parking would be available on the other large ball fields and other large areas of lawn (such as in the vicinity of the swimming pool). Please see Attachment A to the Final EIR.

Response to Comment IF-24:
The proposed shelter-in-place facility would be available to Mussey Grade residents, but is designed for occupants of the camp. Mussey Grade Road residents would not be required to use the shelter-in-place facility ot the camp, but would be allowed to use it if they choose. The residents could also decide to evacuate the area. Please see RDEIR responses to comments IF-21 and IF-23.

Response to Comment IF-25:
If Mussey Grade Road residents decided to shelter on site, the Fire Safety Coordinator would provide important information to everyone about when it is safe to exit the camp. The Fire Safety Coordinator would work with local fire authorities to relay important information to people sheltering at the site.

Response to Comment IF-26:
Comment noted. See RDEIR responses to comments IF-21, IF-23 and IF-25. Also, regarding area-wide evacuation analysis, please see RDEIR response to comment IF-2.

Response to Comment IF-27:
Please see RDEIR responses to comments H-17 and H-32.

The FPP itself states on p. 13 that winds can gust up to 50 mph or higher during Santa Ana events. The ratio of wind gust speed to continuous wind speed is generally taken as 1.6 for engineering purposes.[14] This would imply that by its own reckoning, values greater than 32 mph should be used in Salvation Army modeling. However, engineering safety considerations and recent history teach that this would not be sufficient either.

Weather data from the Goose Valley weather station recorded continuous wind speeds to 35 mph and gusts to 55 mph during the Santa Ana event that led to the October 2007 firestorm.[15] This is the closest RAWS weather station to the Salvation Army property with similar topography.

A standard engineering practice for projecting future "worst-case" wind speeds is to take wind history from a variety of weather stations and apply standard statistical models (now codified in software programs) to calculate the strongest wind speed expected for a given return time[16]. San Diego Gas & Electric Company (SDG&E) has performed such an analysis for the Ramona area as part of their "Sunrise Powerlink" transmission project proposal. For the design of this project, they are estimating that for a 50-year return time, they could expect to see continuous wind speeds of 50 mph with gusts up to 80 mph.[17] IF- 27 (cont'd.)

"Worst-case" conditions may very well be associated with wildland fires that would overrun the camp. In fact, review of the Goose Valley weather station data reveals that the two strongest wind events recorded in roughly seven years of operation were both associated with major wildland fires. One of these fires overran the Salvation Army camp (2003 Cedar Fire), while the other surrounded the entire Mussey Grade neighborhood on three sides (2007 Witch Fire). Hence it is only prudent to assume that if the Salvation Army facility faces fire encroachment in the future, it will be under similar high-wind conditions.

⇒ ***The BehavePlus fire modeling used to calculate flame lengths should also use 35 mph and 50 mph wind speeds as input values. Additional FlamMap runs such as shown in Appendix E of the FPP should be generated for these higher wind values and new maps generated. Adjustment to planned facility layout should be made based upon the results.***

2. Fire services response time to the facility is underestimated IF-28

[14] California Public Utilities Commission; CPUC Phase 2 Testimony for A.06-08-010; SDG&E Sunrise Powerlink Project; Exhibit MG-30; SDG&E Response to MGRA Data Request #6. Can be found at: http://www.sdge.com/sunrisepowerlink/info/MGRADR6Responses3-3-08.doc
[15] Mesowest; The University of Utah Department of Meteorology; *provides graphical interface to weather station data archives;* http://www.met.utah.edu/mesowest/
[16] CPUC Exhibit MG-30; Data Request #6 3/3/08 response.
[17] California Public Utilities Commission; A.06-08-010; SDG&E's 03/19/08 Responses to MGRA Data Request #6; available at: http://www.sdge.com/sunrisepowerlink/info/MGRADR6Responses3-19-08.doc

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, PREPARED BY JOSEPH MITCHELL, PH.D., M-BAR TECHNOLOGIES AND CONSULTING, LLC, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment IF-28:
The FPP has been revised to state that the travel time would be 7.45 minutes. Please see RDEIR response to comment I-14.

On p. 17 of the FPP, the plan quotes the Ramona Fire Marshal as stating that the time for fire services to reach the entrance of the facility would be 4 ½ minutes. The FPP's own calculation implies that 5 ½ minutes is more likely. Both of these are, from a practical standpoint, underestimates. IF-28 (cont'd.)

Once at the Facility entrance, the fire services would need to access the location of the emergency on secondary roads, sometimes unimproved. The FPP needs to specify response times to: 1) the "Shelter-in-Place" facility, and 2) the edge of the most distant structure's fuel modification zone.

The Alliance is able to roughly estimate these response times. Using the map in Appendix E, the distances to the SIP structure would be 4,500 feet and to the edge of the fuel modification zone of the most distant structure would be 9,500 feet. Assuming that 20 mph would be the maximum safe speed on unimproved roads, the response times would increase by 2.5 minutes to reach the SIP structure and 5.4 minutes to reach the furthest structure. IF-29

The total – up to 8 minutes for the SIP facility and 11 minutes for structures on the periphery of development, exceeds the Emergency Response Travel Times criteria set by county guidelines.[18] For intensive development such as found at the Salvation Army facility, these specify that a 5 minute response time must be possible for "*Single-family residential lots of less than two acres, or* ***more intensive uses such as multi-family residential.*** *Includes all industrial development and all commercial development except neighborhood commercial.*" Furthermore, "*Emergency Travel time is defined as the estimated time it will take for a responding fire station to* ***reach the furthest structure in a proposed development project.*** *Travel time is determined by measuring the most direct reliable route with consideration given to safe operating speeds for heavy fire apparatus.*"[19] [Emphasis added] IF-30

Furthermore, the estimates of travel times provided by the FAHJ are for reaching the *entrance* of the facility. On p.17 of the FPP, it is stated "*The Project Availability Form (Appendix D) provided by the Ramona Fire Department (June 2006) provides the Fire Department input regarding response time. The form states that*"... "*...The expected emergency time to the proposed project is 4 ½ minutes.' According to calculations, a linear distance of 19,536 feet from Fire Station No. 82* ***to the camp's entrance*** *would require an average response speed of just less than 50 mph for a 4 ½ minute response time. It is estimated that the average speed would be closer to 40 mph, resulting in an estimated response time of 5.5 minutes.*" IF-31

[18] COUNTY OF SAN DIEGO GUIDELINES FOR DETERMINING SIGNIFICANCE AND REPORT FORMAT AND CONTENT REQUIREMENTS; WILDLAND FIRE AND FIRE PROTECTION; LAND USE AND ENVIRONMENT GROUP; Department of Planning and Land Use; Department of Public Works; March 19, 2007; p. 20. http://www.sdcounty.ca.gov/dplu/docs/Fire-Guidelines.pdf
[19] Ibid.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, PREPARED BY JOSEPH MITCHELL, PH.D., M-BAR TECHNOLOGIES AND CONSULTING, LLC; DATED JUNE 10, 2008 (CONTINUED)

Response to Comment IF-29:
The County disagrees that the access roads would be "secondary" or "unimproved." The FPP requires the on-site access roads to comply with the requirements of the 2009 Consolidated Fire Code section 96.1.503.2.1. Standards for road widths and circulation, interior circulation roads, gates, and driveways are provided by Code. All roads will be improved with asphalt paving or decomposed granite as specified in the Consolidated Fire Code section 96.1.503.2.3.1.

Section 96.1.503.2.1 specifies minimum road width of 24 feet. The fire code official may approve a reduced road width if the reduction does not impair access by fire apparatus. The road width reductions were included in the FPP that was approved by the Ramona Municipal Water District Fire Marshal. This approval is provided in Appendix J of the FPP (see Final EIR Appendix I).

Travel time is defined as the estimated time it will take for a responding fire station to reach the furthest structure in a proposed development project. In addition, travel time is measured from the nearest station obligated to respond. The estimated travel time would be 7.45 minutes (please refer to response to comment I-14). Since travel time is estimated to the furthest structure, both the "shelter-in-place facility" and "the edge of the most distant structure's fuel modification zone" are included in that estimate.

The comment is estimating travel time based on "maximum safe speed on unimproved roads (20 mph)." Again, the County disagrees with this assumption and the conclusion that travel times would then increase to 11 minutes total (to the furthest structure). Based on the fact that the on-site road would be improved (widened and paved), the response speed would be closer to 35 miles per hour and estimated travel time would be approximately 7.45 minutes.

Response to Comment IF-30:
The "county guidelines" referred to in the comment are the County of San Diego Guidelines for Determining Significance, Wildland Fire and Fire Protection. However, since the release of the RDEIR, these guidelines were updated on December 19, 2008. Regardless, the guidelines referenced in the comment refer to the Public Facilities Element. Compliance with this policy is discussed in RDEIR response to comment I-14. Please also see RDEIR response to comment IF-29.

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Response to Comment IF-31:
The comment correctly quoted from the FPP and correctly notes that the times are to the entrance to the facility.

The County agrees with the comment that the FPP should be revised to clarify the response times to the furthest structure. Please see RDEIR response to comment IF-28.

The County disagrees that the travel time standard should be five minutes. A maximum travel time of five minutes is allowed for the Town Land Use Category. The project is not classified as a Town Land Use Category. Please see RDEIR response to comment I-14. Therefore, the County also disagrees that the project is inconsistent with the travel time requirements in the County Guidelines for Determining Significance.

⇒ *The FPP needs to specify response times to the edge of the most distant structure as per Guideline requirements.*

⇒ *If response times to the most remote structure of less than five minutes cannot be met, and suitable mitigation cannot be obtained from the FAHJ, the project should be denied as per instructions in County Guidelines for Determining Significance.*

IF-31 (cont'd.)

C. Structural safety issues

1. Interior sprinklers are not effective in preventing wildland fire ignitions

The FPP states on page 7 that:

"*each structure will contain interior sprinklers which will assist responding firefighting personnel by minimizing resource allocation on the camp site.*"

This statement inadvertently illustrates the fallacy of applying the county's SIP paradigm to this project – notice the assumption that firefighters will be present onsite. Unless they are able to arrive before passage of the fire front, firefighters would have to pass a gauntlet of two miles of burning oaks and chaparral to reach the SIP structure.

Additionally, there is no scientific evidence to our knowledge that suggests that interior sprinklers have any value in preventing ignition under wildland fire conditions. If any exists, it should be cited by the applicant in their final EIR. Standard residential sprinklers are heat-triggered, and in order for them to activate a substantial fire must already be present in the building. Furthermore, most residential sprinklers are not intended for fire suppression but rather for slowing fire growth to allow safe evacuation of the structure.[20] The sole plausible argument that would support the county's promulgation of residential sprinkler systems preferentially in high fire-risk areas is that by slowing structure ignition, they could make it less likely that a structure fire will ignite neighboring vegetation before the fire services arrive. While also lacking scientific evidence, this argument certainly doesn't apply in the case where a massive firestorm is bearing down on the neighborhood.

IF-32

Since fires might be detected by sheltering staff or guests before the heat is sufficient to trigger the sprinkler system, it is critical to prevent panic that on-site staff be able to trigger the sprinkler system within the SIP structure.

⇒ *In order to be of any benefit, the sprinkler system in the SIP structure, at the least, must be capable of being activated manually from within the SIP structure itself.*

IF-33

[20] Hofmann, Anja, and A. Beard; Modeling Fire Scenarios in Residential Buildings with Respect to the Benefit of Smoke Detectors and Flame Retardants in High Risk Items; Fire and Materials, 2007; Jan. 29-31, 2007; San Francisco, CA. During oral presentation.

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Response to Comment IF-32:
The comment is mistakenly inferring that interior sprinklers are being provided to help prevent wildland fire ignitions. The purpose of interior sprinklers is to prevent or delay the flashover point, when a structure is fully engulfed, thus providing extra time for firefighters to arrive. Interior sprinklers have been proven to accomplish this goal at a very high success rate of 95 to 100 percent success (NFPA). When interior structural fires are extinguished by interior sprinklers, fire fighting personnel and equipment can be allocated elsewhere. As the comment states, interior sprinklers would be expected to reduce the likelihood that a structure fire would reach the flashover point and spread into wildland areas. The other fire protection features provided for this site, such as customized fuel modification zones and planting restrictions, would work in tandem with the sprinklers to limit the spread of wildfires.

Response to Comment IF-33:
The interior sprinklers are designed to activate automatically according to strict NFPA requirements which have proven very effective in extinguishing fires or minimizing fire spread. The interior sprinkler system would be designed by a fire protection engineer specializing in sprinkler systems and customized for each building's unique features and design. Manual activation is typically reserved for specific sprinkler system types (deluge systems) that would not be appropriate in the multi-purpose building or other buildings on this site. The automatic sprinkler systems are designed to activate when necessary. Fire extinguishers will be provided in all buildings for additional fire protection.

Comment
Letter IF
(cont'd.) 17

2. No allowance is made for safe evacuation of 1,300 people from the "SIP building" in case of its ignition

There is no provision in the Fire Plan as to how contingencies would be handled if the SIP building itself is compromised and an ignition occurs in an inaccessible area. While structure evacuation is considered a "last resort" contingency during Australian sheltering, no planning has been done to enable the evacuation of 1,300 people from the Salvation Army SIP facility and to get them to a safe area in the event that the fire front has already passed. IF-34

⇒ ***Design of the SIP structure should allow for rapid evacuation of 1,300 people in the case that the building is compromised and ignites. Contingency plans should be in place for evacuation routes and alternative assembly sites.***

⇒ ***Camp staff should receive training from RFD in the use of firefighting equipment.***

3. No allowance is made for protection from smoke, which can harm sensitive individuals.

No mention has been made for provisioning the facility to resist smoke, or provisioning visitors with protective gear, or to care for multiple residents having breathing problems, eye injuries, or emotional trauma. IF-35

⇒ ***Building design should prevent the entrance of smoke and ash.***

⇒ ***Sufficient first aid equipment should be available to handle multiple casualties, and staff should have advanced training. Only non-flammable dust masks should be available.***

4. Restrictions on venting are inadequate

On p. 37, safety measure #8 calls for special venting to be used on the side of the structure that faces vegetation. This is insufficient. Under severe fire conditions, embers will be carried throughout the camp by strong winds, and buildings not immediately facing the vegetation areas will be exposed. While there will be a predominant wind direction (usually between east and north), this may vary significantly as the passage of the fire front creates its own conditions. Furthermore, embers may be deposited by eddies on the leeward side of buildings. IF-36

⇒ ***Hence, where vents must be used, low-profile wire mesh vents should be used for all construction.*** IF-37

On p. 38, safety measure #10 discourages the use of turbine fans. IF-38

⇒ ***Use of turbine fans should be expressly forbidden.***

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Response to Comment IF-34:
Please see RDEIR response to comment IF-16 regarding the defensibility of the shelter-in-place structure. If the shelter-in-place facility needed to be evacuated, efficient evacuation techniques, routes, and alternative shelters will be designated as part of the ongoing training and fire drills that would be supervised the RMWD Fire Services. This information would be added to the site's emergency preparedness plan. Additionally, in the unlikely instance that campers could not get to the primary shelter-in-place facility (the multi-purpose building), other structures on-site could be used to shelter from the fire. All structures on the site will be constructed to the latest codes, including ignition resistant construction, fuel modification zones and interior sprinklers.

Response to Comment IF-35:
The County disagrees that sufficient first aid equipment is not provided by the proposed project. The FPP on page 47 requires the shelter-in-place facility provide "additional amenities" such as, "Emergency preparedness kits to make brief shelter-in-place stay as comfortable as possible and include medical related equipment (i.e. supplemental oxygen, pain relievers, inhalers, etc.)."

The shelter-in-place structure would keep out smoke and ash to the same extent as any other structure would once the windows and doors were closed. The ignition-resistant structural requirements would prevent at least some ash from entering the building (e.g., vents are required to have a 0.25-inch mesh).

Regarding smoke removal, the FPP (page 41) requires a Fire-District-approved method of smoke removal from buildings. The likely method of smoke removal will be an air filtering system with carbon or other filters which will remove smoke and ash. However, the final design will depend on the technology available at the time.

Response to Comment IF-36:
The venting on all structures will comply with the 2009 Consolidated Fire Code. Fire and ember resistant vents will be used on all sides of the structures (FPP, pages 34 and 35).

Response to Comment IF-37:
Comment noted. Please see RDEIR response to comment IF-36.

Response to Comment IF-38:
The County concurs; the following text on page 35 of the FPP has been revised as follows:

"Turbine vents are prohibited."

D. Human behavioral and resident safety issues

1. The facility administrator would have life/death decision-making authority for all of Mussey Grade Road.

On page 45 of the FPP, there is discussion of the process by which the decision to evacuate or shelter would be made in the event of a quickly moving nearby fire. While the facility director would consult with the Ramona Fire Department if possible, and would receive training for this contingency, *both* the RFD and the director will be working under the mistaken assumption that an evacuation would result in a low impact to Mussey Grade Road if the incorrect traffic study in this RDEIR is accepted. IF-39

The camp director would need to make a life-and-death decision for all residents of the Mussey Grade neighborhood, not just those he or she is responsible for in the camp. Conditions may arise which would force a choice between the best interests of camp occupants and the interests of Mussey Grade Road residents. An example would be a fire impacting southern Mussey Grade Road and progressing up the canyon, as the Cedar fire did in 2003. It is possible that there would be time for a safe evacuation of the facility, and this is the preferred option according to this plan. While the facility occupants could shelter in the facility, they will be safer, more comfortable and have more options if relocated to an area unlikely to be directly affected by the fire – so there will be a bias to evacuate, adding to by the misimpression given by the current traffic study. IF-40

However, if evacuation of the facility impedes evacuation of risk areas to the south, it could be deadly for Mussey Grade Road residents. The camp director would need to have correct information regarding the fire and the risks it posed, and would need to make a correct decision that balances the needs and well-being of the people for whom he or she is responsible for (the camp residents) against the needs of people for whom he or she has no responsibility (the Mussey Grade Road residents). For the sake of emergency planning, we cannot assume that the correct decision will necessarily be made. In fact, for safety we must assume the opposite. IF-41

⇒ ***A "wrong decision" by the camp director regarding evacuation must not put the evacuation of Mussey Grade Road residents at risk. No scenario in which residents might be entrapped should be possible.***

2. Planned measures will not prevent a mass exodus from the facility

To address concerns raised by Alliance members, a section has been added to the Fire Protection Plan on pp. 47-48 that discusses the measures that would be taken to prevent the camp guests from making their own decision to relocate *en masse* in the event of a wildland fire. While these measures may be completely moot by an order to evacuate, as past recent history suggests, the Alliance has, nevertheless, examined the evacuation plans of the applicant. Guests would: 1) have to sign a document that they may be precluded from using their cars, and 2) receive orientation to the Shelter-in-Place features of the facility. These are primarily educational in nature and are not sufficiently IF-42

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Response to Comment IF-39:
Please see RDEIR response to comment IF-2.

Response to Comment IF-40:
Please see RDEIR responses to comments D-2 and D-3. The decision to shelter-in-place or relocate the camp occupants would be made by the Fire Safety Coordinator in consultation with the local fire authorities.

Response to Comment IF-41:
Please see RDEIR response to comment IF-40.

Response to Comment IF-42:
Comment noted.

restrictive, as is a third measure that would have staff "*proactively gather individuals and direct them to the Shelter-in-Place site and away from parking areas*". IF-42 (cont'd.)

Education will not necessarily be sufficient to prevent visitors from leaving the facility. It is good to think of sheltering as an abstract concept, but it is impossible to know what people will do when faced with a real emergency in a real wildland fire. This goes for the facility staff as well. Few if any will have had direct experience with wildland fire, and it is unlikely that any of them has ever sheltered through one before or even knows anyone who has – this is a new concept in the United States. Furthermore, the very strong emphasis by emergency services is currently on *evacuation*, most dramatically demonstrated during the October 2007 fire storm which had nearly half a million people under an evacuation order. IF-43

People will also be hesitant to leave their vehicles to burn, and this will create a strong incentive for them to stay. In fact the issue of vehicle ignition has not been addressed. Vehicles will remain at risk and may be lost in a mass conflagration in the parking lot. This has been recognized as a potential hazard during Shelter-in-Place operations, and its prevention can occupy emergency workers who could be otherwise engaged. This occurred during the siege of Barona Casino during the Cedar fire in 2003. [21] IF-44

⇒ ***During fire season, all visitors should be bused into the facility in order to reduce the risk of unauthorized evacuation in a fire emergency.*** IF-45

3. Some children would experience severe psychological effects from close exposure to wildland fire

One important element of Australian guidelines is the emphasis that only able-bodied and healthy adults should remain in the area of a wildland fire. The elderly, infirm, and children are recommended for early evacuation. In fact, two studies of the psychological impact of wildland fire on children have been conducted in Australia.[22,23] These indicate that over 10% of children experiencing a wildland fire close hand will experience severe, long-lasting, and debilitating post-traumatic stress effects. IF-46

⇒ ***Identification of visitors with health or emotional conditions that could prevent them from sheltering safely should be made prior to or at the time of their arrival at the facility. Sensitive persons should be given priority for evacuation.***

[21] Halsey, Richard W; Fire, Chaparral, and Survival in Southern California; Sunbelt Publications; San Diego; 2005; pp. 52-53.
[22] McFarlane, A.C.; Posttraumatic Phenomena in a Longitudinal Study of Children Following a Natural Disaster;Journal of the American Academy of Child and Adolescent Psychiatry; 26, 5:764-769; 1987
[23] McDermott B.M. , Lee E, Judd M, Gibbon P; Posttraumatic Stress Disorder and general psychopathology in children and adolescents following a wildfire disaster; Canadian Journal of Psychiatry 2005;50:3 137-143.

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Response to Comment IF-43:
The fact that "a *very strong emphasis by emergency services is currently on evacuation*" (from comment) is a key factor for the Salvation Army site. The preferred response to a wildfire would be to relocate camp visitors and staff. If safe relocation were not possible, then the shelter-in-place option would be used. The FPP requirement that the camp conduct fire drills and maintain adequate busing and high occupancy vans on-site will be a condition of the approval if the Major Use Permit Modification is approved. All camp visitors will be provided with education about wildfires during the mandatory orientation to be given within the first 24 hours of coming to the camp. The orientation will also include the demonstration of the emergency alarm signal and the appropriate actions to take in an emergency. All camp visitors will be provided with education materials about the shelter-in-place capability at the site and the strict requirement that they follow directions in the event of an emergency. Please refer to the FPP, Section 6.3 "Sheltering in Place." Consequently, there is no reason to expect they would ignore direction during an emergency. As explained in the FPP, because the site is isolated, individuals are less likely to think they can find their own way to safety and thus would more readily accept instructions during an emergency, including procedures for sheltering-in-place.

A recent example shelter-in-place being successfully employed was at Westmont College near Santa Barbara. Please refer to response to comment D-6.

Response to Comment IF-44:
The FPP requirement that the camp conduct fire drills and maintain adequate busing and high occupancy vans on-site will be a condition of the approval if the Major Use Permit Modification is approved. All camp visitors will be provided with information about wildfires during the mandatory orientation to be given within the first 24 hours of coming to the camp. The orientation will also include a demonstration of the emergency alarm signal and the appropriate actions to take in an emergency. Typically, an organized camp like the Salvation Army's, has a population that readily accepts instruction from camp leaders, such as camp counselors. Therefore, while is it true that campers may be hesitant to leave their vehicles on-site during evacuation, it is reasonable to conclude that the camp visitors would follow evacuation orders. The potential for "mass conflagration" of vehicles would be substantially reduced by the fuel modification zones that will be provided around the parking areas as outlined in the FPP (see Attachment A to the Final EIR and FlamMap Fire Behavior Exhibit E of the FPP). The fuel modification requirements would remove the fuel that would otherwise

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Response to Comment IF-44: (cont'd.)
allow a wildfire to generate extreme heat that may ignite the parked cars. County Fire Services Coordinator contacted the Incident Commander at Barona Casino during the Cedar Fire. The Incident Commander said that he assigned one engine to patrol the Barona Casino parking lot and surrounding area, but there were no fires in the parking lot or surrounding area to put out. According to the County Fire Services Coordinator, this deployment of fire fighting resources was prudent but would not be the highest priority. Consequently, it is highly unlikely that fire fighters would attempt save vehicles rather than people or structures.

Response to Comment IF-45:
The County disagrees with the comment. Please see RDEIR response to comment IF-43.

Response to Comment IF-46:
Please see RDEIR response to comment IF-17.

4. The onsite smoking prohibition could ironically lead to surreptitious smoking in risk areas

On p. 25 of the FPP, the plan notes that smoking will be forbidden at the Salvation Army facility. While this might be thought of as a positive measure, it ironically presents a problem as well. Nicotine is addictive, and smokers may look for private and secluded places to practice their habit. Unless these people exercise good judgment – and some might be children so we must assume that this will not be the case – they may go off into the brush where they won't be seen in order to smoke. IF-47

While its own staff might be expected to adhere to a smoking ban, the Salvation Army will occasionally need to hire contractors and vendors to do work on the property. It is reasonable to assume that some fraction of these will be smokers, and not all of these will willingly adhere to the smoking ban.

As noted in our 2005 comments on the preliminary RDEIR, the significant increase in the size of the camp and its proposed layout will mean that children will not have the same level of supervision that they have had up to now. The greater physical separation of facilities for children and camp counselors increases the chance that the occasional child or teen might be tempted to go "sneak a smoke". If they were to seek privacy in a vegetated area, this could very well be disastrous. The point here is that no-smoking rules will not suffice to prevent smoking and the danger of smoking adds to the overall fire danger.

E. "Same practical effect" is not achieved

The project and its FPP do not currently meet the criteria for "same practical effect" that would allow it to avoid the requirement for a secondary access, as it states as its goal on p. 50. The reasons have been detailed elsewhere, but are summarized again here:

- Measures stated in the FPP will not prevent the evacuation of the facility at the same time that residents are trying to evacuate from southern Mussey Grade Road.
- Measures stated in the FPP will not prevent facility guests or residents from leaving of their own accord during a wildland fire emergency IF-48
- Measures stated in the FPP will not guarantee a correct decision by the facility supervisor in the event of a wildland fire emergency.
- Evacuation may not be at the discretion of the camp director but instead be ordered by authorities.
- Emergency response times to the key facilities and the most remote structure on-site are not within the 5-minute limit set by County guidelines for intensive development. Measurements provided by the FAHJ measure response times only to the *entrance* of the facility, and these are at the limits of permissible transit time.
  Furthermore, *no mitigation measures have been proposed or approved* to compensate for the inability to meet this requirement. According to the Guidelines: "*If the appropriate emergency travel time cannot be met for a*

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Response to Comment IF-47:
The County does not concur with this comment. The possibility of an increased fire risk because the number of people who attend the camp and who smoke might increase and because some campers or construction workers might attempt to "sneak a smoke" in chaparral areas and might carelessly dispose of a cigarette that might cause a brush fire is too speculative for evaluation. CEQA does not require an EIR to evaluate speculative impacts.

Response to Comment IF-48:
Please see RDEIR response to comment H-38.

Response IF-48 – first bullet point :
The measures provided in the FPP are specifically designed to reduce potential impacts on Mussey Grade Road during a wildfire emergency through a redundant fire protection system including shelter-in-place design strategy. Please see RDEIR responses to comments D-2 and D-3.

Response IF-48 – second bullet point:
Please see RDEIR response to comment IF-43.

Response IF-48 – third bullet point:
Please see RDEIR response to comment D-2.

Response IF-48 – fourth bullet point:
Please see DEIR response to comment IF-18.

Response IF-48 – fifth bullet point:
Regarding emergency response times, please see RDEIR responses to comments I-14, IF-29 and IF-30.

proposed discretionary project, the project will be denied unless sufficient mitigation measures are included as a basis of approval based on the recommendations of the Director of Planning and Land Use and the Fire Authority Having Jurisdiction (FAHJ)." It might be argued that the approval already provided by FAHJ already satisfies the requirements. This is not true – this approval was issued in June, 2006, before the new County guidelines were in effect. If the Salvation Army wishes to grandfather this approval in, they would need to argue to do so under the old rules – which require secondary access. It should not be permissible to "mix and match" definitions and approvals from the old and new County codes and guidelines. The guidelines that allow for "Shelter-in-Place" assume that the increase in risk resulting from the decision to remain within a wildland fire zone can be mitigated for or even reduced by adhering to an additional set of strict requirements. ***All of these pre-conditions creating "same practical effect" must be met before a Shelter-in-Place option can be approved. This includes an emergency response time of less than five minutes to the most remote structure on the property or other mitigation approved by the FAHJ.***

IF-48
(cont'd.)

- Fire modeling used to assure safety of SIP structure did not use realistic "worst case" conditions. According to County guidelines for determining "same practical effect", worst case assumptions *must* be used for fire modeling: "*The Fire Model will evaluate a **worst-case scenario** wildland fire event based on site topography, fuel loads, **atmospheric conditions**, and maximum heat production. From the results of the model, combined with the consultant's expertise, minimum fuel modification and brush clearance distances can be determined to ensure relatively safe building sites.*"[24] [Emphasis added]

- Safety of the facility guests and residents is not guaranteed at the same level as if they were safely out of the fire zone:
  - No contingency planning has been done regarding the ignition of the SIP structure with residents inside.
  - No allowance has been made for safe evacuation of the SIP structure.
  - There is no plan to accept additional vehicular traffic beyond the facility's capacity if Mussey Grade residents decide to shelter there.
  - Residents & guests will be exposed to significant smoke which will affect sensitive individuals.
  - Residents & guests may be exposed to stress which can have lasting effects in sensitive individuals.

[24] COUNTY OF SAN DIEGO GUIDELINES FOR DETERMINING SIGNIFICANCE AND REPORT FORMAT AND CONTENT REQUIREMENTS; WILDLAND FIRE AND FIRE PROTECTION; LAND USE AND ENVIRONMENT GROUP; Department of Planning and Land Use; Department of Public Works; March 19, 2007; p. 19. http://www.sdcounty.ca.gov/dplu/docs/Fire-Guidelines.pdf

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Response IF-48 – sixth bullet point:
Please see RDEIR response to comment H-32.

Response IF-48 – seventh bullet point:
As the FPP clearly states, the preferred alternative for this site is evacuation of staff, campers, and visitors to an area outside the "fire zone." However, when faced with a decision of potentially exposing people to dangerous roadways or contributing to road congestion, the shelter-in-place decision will be made as the safest alternative.

- Regarding the ignition of the shelter-in-place structure, please see RDEIR response to comment IF-16.
- Regarding safe evacuation from the shelter-in-place structure, please see RDEIR response to comment IF-34.
- Regarding additional emergency parking for area residents to shelter-in-place, see RDEIR response to comment IF-23.
- Regarding exposure to smoke while sheltering-in-place, please see RDEIR response to comment IF-35.
- Regarding stress effects associated with sheltering-in-place, please see RDEIR response to comment IF-17.

Comment Letter IF (cont'd.) 22

⇒ *The secondary access requirement requested by the Ramona Municipal Water District should be a prerequisite condition for approval of the proposed expansion.* IF-49

⇒ *If no mitigation measures are proposed that meet the criteria specified by the County Guidelines for Determining Significance, the project should be denied.* IF-50

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, PREPARED BY JOSEPH MITCHELL, PH.D., M-BAR TECHNOLOGIES AND CONSULTING, LLC, DATED JUNE 10, 2008 (CONTINUED)

Response to Comment IF-49:
Please see RDEIR responses to comment Letter D and RDEIR response to comment H-38.

Response to Comment IF-50:
It is not clear which criteria from the "County Guidelines for Determining Significance" the comment is referring to. Please see RDEIR responses to comments H-25 and H-28 for a discussion of how the County Guidelines were applied to the project.

REFERENCES

California Public Utilities Commission; CPUC Phase 2 Testimony for A.06-08-010; SDG&E Sunrise Powerlink Project; Exhibit MG-30; SDG&E Response to MGRA Data Request #6. Can be found at:
http://www.sdge.com/sunrisepowerlink/info/MGRADR6Responses3-3-08.doc

California Public Utilities Commission; A.06-08-010; SDG&E's 03/19/08 Responses to MGRA Data Request #6; available at:
http://www.sdge.com/sunrisepowerlink/info/MGRADR6Responses3-19-08.doc

Country Fire Authority; Community fireguard – guidelines for groups; Erwins Printing, Dandenong, VIC, Australia; 2004. http://www.cfa.vic.gov.au

COUNTY OF SAN DIEGO GUIDELINES FOR DETERMINING SIGNIFICANCE AND REPORT FORMAT AND CONTENT REQUIREMENTS; WILDLAND FIRE AND FIRE PROTECTION; LAND USE AND ENVIRONMENT GROUP; Department of Planning and Land Use; Department of Public Works; March 19, 2007.
http://www.sdcounty.ca.gov/dplu/docs/Fire-Guidelines.pdf

Halsey, Richard W; Fire, Chaparral, and Survival in Southern California; Sunbelt Publications; San Diego; 2005.

Harrap, Keith; Asst. Commissioner AFSM; Evacuation – Strategic withdrawal or abandoning the community; Wildland Fire 2004; March 3-5; Reno NV; *during oral presentation.*

Hofmann, Anja, and A. Beard; Modeling Fire Scenarios in Residential Buildings with Respect to the Benefit of Smoke Detectors and Flame Retardants in High Risk Items; Fire and Materials, 2007; Jan. 29-31, 2007; San Francisco, CA. During oral presentation.

McDermott B.M. , Lee E, Judd M, Gibbon P; Posttraumatic Stress Disorder and general psychopathology in children and adolescents following a wildfire disaster; Canadian Journal of Psychiatry 2005;50:3 137-143.

McFarlane, A.C.; Posttraumatic Phenomena in a Longitudinal Study of Children Following a Natural Disaster;Journal of the American Academy of Child and Adolescent Psychiatry; 26, 5:764-769; 1987.

Mesowest; The University of Utah Department of Meteorology; *provides graphical interface to weather station data archives;* http://www.met.utah.edu/mesowest/

Joseph W. Mitchell for the Mussey Grade Road Alliance; DRAFT Mussey Grade Road resident fire safety requirements; July 17, 2006. *Attachment B.*

Mitchell, Joseph W.; Wind-enabled ember dousing; Fire Safety Journal; Volume 41, Issue 6, September 2006, Pages 444-458.

Mitchell, Joseph W. and Oren Patashnik; Firebrand Protection as the Key Design Element for Structure Survival during Catastrophic Wildland Fires; Fire and Materials 2007, San Francisco, Jan. 2007. Available at:
http://www.mbartek.com/FM07_FirebrandsWildfires_1.1F.pdf

Mitchell, Joseph W.; Playing with fire – the county's Shelter-in-Place gamble; San Diego Union-Tribune; May 2, 2007; p. B7.

Ramona Municipal Water District Cedar Fire Hearings, January 2004.
http://www.musseygraderoad.org/CedarIndex.htm ; also available in original audio format from the Ramona Municipal Water District, 105 Earlham Rd., P.O. Box 1829, Ramona, CA 92065, USA.

Transportation Research Board; Highway Capacity Manual; HCM2000; Washington, D.C.; www.TRB.org .

Webster, Joan; The complete bushfire safety handbook; Random House Australia; Sydney; 2000.

Appendix A

Letter from Ken and Joanne Gamble

During the Cedar Fire of 2003, we decided to go back down Mussey Grade Road later that morning to see what we could do. Firemen, who would not venture down the road, stopped us. The road was too dangerous for firemen and so they were keeping people out. On a road where even firemen do not venture during a fire, why would the county approve the expansion of a retreat center to allow hundreds of more people there?

Mussey Grade Road has a greater traffic problem now than when the traffic study was done by the Salvation Army in the spring of 2004, because Mussey Grade Village, a transient housing-resort type community along MG Road, has higher occupancy now than in the spring of 2004 and the owner is not kept in check by the code compliance department.

Since 2003, the owner of MG Village has placed some 20-30 Park Model RVs, in 90-day, max-occupancy RV sites and continues to rent out to people on a permanent basis, year round. After the fire, many singlewide mobile homes and Park Model RVs were burned and the tenants were forced out by the owner, thus creating a dip in density for a period of about a year. In the recovery year, the owner replaced all the Park Model RVs and placed new, doublewide and triplewide modular homes in the park, attempting to make the resort into a high-end mobile home park, rather than the transient-resort it is permitted to be. Since the fire, I would estimate that the population at MG Village has doubled.

During the Mandatory Evacuation of the Witch Creek Fire of 2007, we were stopped at the Laurel Lane/Mussey Grade Road intersection by a fallen oak tree. Traffic had backed up in both directions while a crew of 6 men and a bulldozer attempted to remove it. Once it was removed, the cars were able to resume normal speeds quickly because there were not that many cars backed up. If more cars are added to this type of situation the back up could be a life-threatening situation.

Ken Gamble and Joanne Gamble
19510 Laurel Lane
Ramona, CA 92065

Appendix B
See attached file "MGRA_SA08_AppB_SafetyReqsRevised06.doc"

Appendix C

The following excerpt is from the un-redacted transcripts of the Ramona Municipal Water District Cedar Fire hearings, held in January 2004:

Ramona Municipal Water District Cedar Fire Hearings, January 2004. http://www.musseygraderoad.org/CedarIndex.htm ; also available in original audio format from the Ramona Municipal Water District, 105 Earlham Rd., P.O. Box 1829, Ramona, CA 92065, USA.

This excerpt of testimony is from Beverly Hasting of 16425 Mussey Grade Road, and was given during Session 3, on January 29, 2004.

Beverly Hasting: ***This is about 7:00ish, we finally got out of there about 7:00, 7:30 and we got in the long line on Mussey Grade with everybody going three miles an hour, some people holding their horses and walking them and it took, and I have to say, and I've mentioned this before, we all must have learned something in elementary school, don't panic, don't run because you should have seen everybody on Mussey Grade Road, everybody had things packed up and were in an orderly manner just like we were in grade school.***

Bob Krysak: ***So the road was pretty crowded at that point with people leaving?***

Beverly Hasting: ***We were bumper to bumper.***

Bob Krysak: ***Were they using both lanes at that point to evacuate or just the one that was...***

Beverly Hasting: ***One going out and we never saw anything going in, except maybe some of the people that decided to go back and get more stuff.***

Doug Hasting: ***People were trying to get back...***

Beverly Hasting: ***And we were on that road at least a good 35 minutes, 40 minutes till we got to the end and then the next thing I knew I heard it's burned, their gone and the trailer park was gone and then it wasn't until the next day that I found out mine was gone....***

Appendix D

See attached file "MGRA_SA08_AppD_Mitchell_CV.doc"

DRAFT Mussey Grade Road resident fire safety requirements

By Joseph Mitchell, Ph.D. for Mussey Grade Road Alliance 7/17/2006

Purpose:

The purpose of this draft document ("Draft") is to summarize the major concerns, as I understand them, of Mussey Grade Road residents vis-à-vis the fire danger posed by the proposed, massive expansion of the Salvation Army Retreat & Conference Center ("Facility"). While many of these issues have been raised in the past, this Draft is an attempt to separate out performance-based requirements (what we need) from prescriptive solutions (how we achieve those requirements).

This Draft is written with the experience of the catastrophic Cedar Fire of 2003 in mind, including the loss of some 106 homes on Mussey Grade Road during that wild land-urban interface fire. This is relevant because catastrophic wind-driven fires, such as Cedar, are primary causes of both life and property loss despite their rarity. Hence, they are the type of event to be planned for. This Draft also incorporates by reference the Mussey Grade Road Alliance ("Alliance") response ("Response") to the Salvation Army's ("Army") Draft Environmental Impact Report ("DEIR"), March, 2003, specifically the chapter entitled "Fire and safety hazards posed by the Salvation Army facility expansion," written by myself, attached.

The goal in presenting this Draft to Ramona Municipal Water District President Robert Krysak, Ramona Fire Chief Michael Vogt and Ramona Fire Marshal Jim Hollingsworth is to initiate a good-faith effort by the Ramona fire marshal to create a fire plan ("Fire Plan") that meets the needs of both Facility occupants and the neighboring community of the Mussey Grade Road corridor.

This document in no way endorses the major use permit expansion proposed by the Army to increase their present occupancy of some 120 persons to substantially larger figures. The Alliance has consistently objected to this expansion on the many grounds, including the incongruous, commercial land use in a rural community, massive environmental impacts, and the critical issue of fire safety.

As fire safety is the primary responsibility of the Ramona Municipal Water District ("District") and the CDF through its contract with the district, and because fire safety concerns are of paramount importance, the Alliance agrees with the fire marshal that it is appropriate to discuss this issue with the District and the CDF.

All requirements shown below are listed in **bold face**. Descriptive text is in plain font. Additionally, all requirements will be specified with tests or verifications. indicated with *Verification (in italics)*. Where prescriptive suggestions are made, these are [placed in square brackets], with the understanding that other solutions may be proposed.

Requirements:

1. **Any increase in Facility occupancy shall not result in a significantly increased evacuation time for any resident of the Mussey Grade corridor based on the most current population figures available (for all residents using Mussey Grade as an egress) during an emergency fire evacuation.**
   "Significant" is defined as greater than 5%.
   [Our prescriptive solution to this problem is a secondary access to the Facility that does not empty in any manner onto Mussey Grade Road. In 2005 the District voted to require a secondary access as an additional condition to be included in the major use permit. This requirement is the optimal solution and is preferred over all other solutions.]
   Verification: A traffic simulation of a "worst case" evacuation of the Mussey Grade corridor shall be performed and the worst-case delay time plotted as a function of additional vehicles injected by an Army Facility evacuation.

2. **It shall be assumed for the sake of evacuation calculations that all adults with vehicles at the Facility will choose to leave the Facility. Carpooling will not be assumed for either guests or staff.**
   While shelter-in-place strategies may be devised for entrapment scenarios, and while these might be successful under some circumstances, these circumstances do not apply in the case where adults have available vehicles and are not faced with a physical constraint. During the successful sheltering Cedar Fire operations at the Barona and Rincon casinos, for instance, the attendees were in a building where the exits could be locked and egress prevented. This situation does not exist at the Facility, where there is no potential for restriction of egress.
   Verification: See Verification 1.

3. **Historical usage patterns at the Facility shall not be assumed for the sake of the Fire Plan or calculations it is based upon.**
   If a major expansion occurs, the nature of the use of the Facility, will change. A conservative assumption is that the maximum use permitted by the occupancy permit will be in effect at all permitted times year-round. Maximum occupancy should be based on the maximum occupancy proposed by the Army in the DEIR.
   Verification: Maximum occupancy at all times will be assumed in the Fire Plan. Where this results in unsafe conditions, occupancy limits (seasonal or otherwise stipulated) will be explicitly stated.

4. **Occupancy at the Facility shall be monitored and limits enforced.**
   The enforcement resources of San Diego County are extremely limited. It is not a reasonable assumption that the County will assume the responsibility to regularly monitor occupancy rates at the Facility. OCCUPANCY FOR FIRE SAFETY PURPOSES IS NOT ENFORCEABLE SANS EXTRAORDINARY MEASURES.
   Verification: We are unable to suggest a monitoring plan that would provide

sufficient assurance to the residents that the Army is adhering to occupancy provisions. This matter needs to be resolved.

5. **Measures will be taken to prevent Facility occupants and staff from evacuation on foot during a wildland fire event. Additionally, staff should be fully prepared to make appropriate decisions with regard to occupancy safety during a wildland fire event.** A major concern is that Facility staff, faced with a wildland fire, may direct the Facility occupants to flee on foot if there are no means to evacuate by bus or car. This would not only put the Facility residents in grave danger, but could effectively halt or impede vehicular evacuation of residents along Mussey Grade Road.
   [Facility staff should be trained in wildland fire behavior, proper measures to take when fire threatens, and should be able to operate all fire protective equipment at the Facility site. Staff should include professionals with security and crowd management training and experience who will be prepared to prevent the movement of persons off of the Facility contrary to the Fire Plan during a wildfire incident. Training would be conducted and coordinated by the Fire Marshal or by a designee approved by the Fire Marshal. The Army shall create for approval by the Fire Marshal a training program for Facility staff and shall secure approval on a yearly basis.]
   Verification:. The Fire Marshal will keep complete records for the Facility in this regard, which will be available to the public.

6. **Seasonal fire requirements shall be invoked during the specified periods as well as during times of high or extreme fire danger even if these time periods occur outside of the "regular" fire season. What is considered the "regular fire season" shall be defined.**
   Recent results from Scripps Oceanographic Institute indicate that there has been an increase in the length of the fire season nationally. This increase is partially responsible for the attendant increase in wildland fire incidents over the last decades in the United States. If as suggested, this increase is linked to climate change, then this trend will continue. Additionally, our precipitation and temperature patterns vary greatly from year to year, and there is the potential for "fire weather" patterns to occur at unexpected times.
   [The Fire Plan should specify that the Fire Marshal will activate "fire season" restrictions on the Facility during "fire season" and additionally during other times in the event that High or Extreme fire danger occurs outside of the normal season.]
   Verification: Fire Plan stipulation.

7. **Calculations used to create the Fire Plan will use parametric values characteristic of catastrophic, wind-driven wildland fires when performed for "fire season" scenarios.**
   Verification: Where calculated values are given in the Fire Plan, the underlying assumptions and input values supporting these calculations will be clearly stated.

8. **If mitigating measures approved now that enable higher occupancy are found in the long run to be poor practice, and if new future requirements cannot be met, the occupancy numbers will be adjusted downwards accordingly.**
   The concern here is to prevent "grandfathering" of poor practice as new best practices, fire codes, and standards evolve.
   Verification: Fire Plan stipulation.

9. **Any high-occupancy "special events" will require notification of both the neighborhood and the Ramona Fire Department.**
   [A special permit shall be required by the Fire Marshal.]
   Verification: Fire Plan stipulation. Public Notice signage at the Army gate alerting residents to occupancy rate.

10. **Effective measures will be taken to prevent fires caused by cigarettes, camp fires, and other potential hazards, such as fireworks, at the Facility.**
    It was noted with some concern in the Alliance Response that Facility counselors would be residing much farther from the Facility occupants than presently. Additionally, according to the Army's DEIR, there will be a much lower ratio of staff to occupants in the future. These increases the chances that insufficiently supervised occupant activities could ignite a fire.
    [Action:
    - Re-establish a minimum counselor : occupant ratio
    - Require staff housing be near occupant housing
    - Establish a fire-safe smoking area
    - Train staff in the use of fire equipment.
    - Produce fire safety video to be required viewing for all occupants.]
    Verification: Revision of Army proposed plan to incorporate the above. Fire Marshal to receiving monthly reports of video viewings by name of occupant and time of viewing, which are available to the public. Results of inspections and audits of safety programs by the Fire Marshal's office to be made public.

11. **All stipulations that are made in the Fire Plan (already specified herein or not) shall contain specifications for 1) Verification of the stipulation by the Fire Marshall's office or by specified agency and 2) Means by which interested members of the public can audit these verifications.**
    All verification measures should be "reasonable", so that it can be expected that the verifying agency will be likely to carry them out given the resources likely to be made available. What we are trying to avoid here are Plan conditions that are never checked or which cannot be checked. It should not be up to the public to conduct such checks themselves, but they should be able to verify that the checks are actually being conducted by the appropriate bodies.
    Verification: Fire Plan content

CONCLUSION

At the present time, the Army seems to have no fire plan in place. Past descriptions of the Army's proposed expansion plans have included shelter-in-place planning, which was eliminated in the DEIR. However, there is a requirement to the Army's expansion of the major use permit voted on by the Ramona Municipal Water District: a secondary access road. This is currently the operative requirement and is considered by the District and residents to be the best option to ensure the fire safety of residents of Mussey Grade Road and occupants of the Facility. Any proposed modifications to this requirement would be expected to yield the same or better results.

JOSEPH W. MITCHELL, PH.D.

Vitae

2008 – Submission of expert witness testimony in the California Public Utility Phase 1 and Phase 2 hearings for the proposed SDG&E "Sunrise Powerlink" transmission line on the subject of power lines and wildland fire, which included cross-examination and contribution to briefs. Demonstrated potential fire risks from transmission lines, and also found a significantly larger number of power line fires in San Diego County.

2007 – Presented work with Oren Patashnik at *Fire & Materials 2007* conference in San Francisco, whose Scripps Ranch data demonstrated potential ember vulnerability of curved-tile roofing. Provided comment on and criticism of San Diego County's 'shelter-in-place' guidelines. Wrote an op-ed piece published in the San Diego Union Tribune and provided commentary for News 8 KFMB piece on shelter-in-place.

2006 – Publication of peer-reviewed paper on the WEEDS water-spray wildland fire protection system in the *Fire Safety Journal*. Presentation of results at the *Third International Fire Ecology and Management Congress*, San Diego, CA.

2005 – Assimilation of all relevant academic literature regarding structure ignition in wildland fires and the dominance of wind-driven catastrophic events. Published articles in *Home&fire* and *Wildfire* trade magazines. Computer modeling validates WEEDS principles.

2004 – Founded M-Bar Technologies and Consulting to promulgate knowledge regarding WEEDS and the importance of designing for firebrand protection under high-wind conditions. Poster session at *Wildfire 2004* conference, Reno, NV. Article published in *San Diego Reader* magazine.

2001-2003 – Developed the WEEDS method for structural defense during wildland fires. Completed in time for the October 26, 2003 Cedar fire, when it was tested under wildland fire conditions. It worked.

1999 – Returned to the United States from Europe, settling in San Diego, CA.

1996-present – Work in software engineering and management for major multinational corporations.

1989-1998 – Lived and worked in Europe first as a postdoctoral physicist and then in software engineering for a multinational corporation. Resided in Switzerland, Germany, France, and Belgium.

1993-1996 – Postdoctoral work for University of California at Davis in heavy ion physics, performed at CERN. Continued with work in lasers and optical systems.

1989-1993 – Postdoctoral work for McGill University in high energy physics at CERN (Center for European Nuclear Research, Geneva, Switzerland) and DESY (Deutsches Electron-Synchrotron, Hamburg, Germany). Developed expertise in computer modeling, lasers and optical systems.

1989 – Ph. D. in Physics received from Ohio State University, Columbus, Ohio

1981-1989 – Graduate research in elementary particle (neutrino) physics, Columbus and Los Alamos National Laboratory, NM. Trained in electronics, mechanical engineering, computing. energy measurement and statistics.

1981-1983 – Graduate teaching assistant, OSU physics department.

1981 – Bachelor of Science in Physics received from Ohio State University, Columbus, Ohio

Expert Testimony

California Public Utilities Commission; Application Proceeding A.06-08-010; Mussey Grade Road Alliance (MGRA); MG-1; MGRA Phase 1 Direct Testimony; Sunrise Powerlink Transmission Line Project; Application No. 06-08-010; March 12, 2008 http://www.mbartek.com/cpucspl/cpuc_index.html

California Public Utilities Commission; Application Proceeding A.06-08-010; Mussey Grade Road Alliance (MGRA); MG-20; MGRA Phase 2 Direct Testimony; Sunrise Powerlink Transmission Line Project; Application No. 06-08-010; May 31, 2007 http://www.mbartek.com/cpucspl/Phase2/phase2_index.html

Publications

Fire Publications & Presentations:

Mitchell, Joseph W.; Playing with fire: The county's 'Shelter in Place' gamble; The San Diego Union-Tribune; May 2, 2007, p. B7.
http://www.signonsandiego.com/uniontrib/20070502/news_lz1e2mitchell.html

Mitchell, Joseph W. and Oren Patashnik; Firebrand Protection as the Key Design Element for Structure Survival during Catastrophic Wildland Fires; Fire and Materials 2007, San Francisco, CA; Jan 29-31, 2007
http://www.mbartek.com/FM07_FirebrandsWildfires_1.1F.pdf

Mitchell, Joseph W.; REDUCING URBAN INTERFACE ECOLOGICAL IMPACTS AND FIRE LOSSES THROUGH STRUCTURAL FIREBRAND PROTECTION; Third International Fire Ecology and Management Conference; San Diego, CA; Nov13-17, 2006. Presentation available from www.mbartek.com.

Mitchell, Joseph W.; Wind-enabled ember dousing; Fire Safety Journal; v. 41 (2006); pp 444-458

Mitchell, Joseph W.; Brand Dilution (Cover article); Wildfire Magazine; Mar. 2005 http://wildfiremag.com/wui/brand_dilution/

Mitchell, Joseph W.; WEEDS: Wind Enabled Ember Dousing System; Home&fire Magazine; Spring, 2005; p. 32

Mitchell, Joseph; Engineering a Miracle; San Diego Weekly Reader Magazine; April 29, 2004

WEEDS poster session; Wildfire 2004 conference, Reno, NV; Mar. 2004

Physics: List of neutrino, high-energy, and heavy ion physics publications is available upon request.

Other Experience

International:

Spoken & written German; some French. Extended business trips to Japan.

Technical & Managerial:

Five years of managerial experience in a software development organization. Twelve years of experience in corporate software development environments in the financial application and consumer electronics industries.

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Comment
Letter IB

BIOLOGICAL RESOURCES COMMENTS
FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE
FINDINGS

Bonnie J. Hendricks
6/9/08

Introduction

Upon review of the RDEIR biological resources section, it is apparent that many of the previous biological resources comments have not been adequately addressed. Several of the primary points are summarized as follows: IB-1

- The focused surveys for all sensitive plant and wildlife species are outdated, as they were conducted between 1999 and 2001. Current USFWS protocol surveys need to be conducted for listed wildlife species, and sensitive species surveys need to be conducted for all other wildlife species.
- Updated rare plant species surveys still need to be conducted. These surveys are particularly important for Encinitas baccharis and Lakeside lilac, among others, which may not have been detectable in the closed canopy conditions that existed prior to the Cedar fire. Many rare plant species are more easily detected during post-fire conditions. IB-2
- A wildlife movement study based on field data collection has not been conducted. The RDEIR and the Biological Technical Report claim to have done a corridor map analysis, however no field data or map analyses are presented to support the conclusions. The Alliance urges the DPLU to require a wildlife tracking study be conducted for purposes of a wildlife corridor analysis, or, alternatively, use the independent study conducted by the San Diego Tracking Team and submitted by the Alliance (attached). IB-3
- The RDEIR concludes erroneously and without evidence, as did the previous DEIR, that the Salvation Army property does not contain a habitat linkage and is therefore exempt from the Design Criteria for Linkages and Corridors within the MSCP Findings of Conformance. IB-4
- The project alternatives continue to fail to meet the standards necessary to conform to the BMO Project Design Criteria and Design Criteria for Linkages and Corridors, and to conform with the objectives of the County MSCP Subarea Plan. The project therefore, cannot be approved. IB-5a

Additional new areas of concern raised by the RDEIR revisions include the new buffer analysis, the new RPO wetlands interpretations and reduced wetland area reported, and the new wildlife corridor assumptions presented without supporting evidence.

An assumption is made in the RPO wetland analysis that the Central Camp Tributary Drainage and Southern Camp Drainages should no longer be considered RPO wetlands because they have low functions, that they do not support sensitive species, and that they are not part of a wildlife corridor. Insufficient evidence is given to support such IB-5b

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008

Response to Comment IB-1:
As addressed in the previous responses to comments, surveys for quino checkerspot butterfly and Stephens' kangaroo rat are typically not repeated as these species do not seem to be expanding their range, and the extent and locations of their known populations are well documented. Similarly, the California gnatcatcher does not typically occur within the region. The most recent regional sightings for this species date to 1999, and there have been no new occurrences of gnatcatcher in the vicinity of the project since the surveys of the project site were completed. This conclusion is based on data from the California Natural Diversity Database and the United States Fish and Wildlife Service Geographical Information System (GIS) databases. While updated focused surveys for the gnatcatcher have not been conducted since 1999, various biology surveys have been conducted on the project site, and no gnatcatchers or other sensitive wildlife or plant species beyond those previously identified as occurring on the project site were detected. Direct impacts to gnatcatcher have not been identified, but the project would impact gnatcatcher habitat. Therefore, mitigation measures have been included in the Final EIR (e.g., MM2.2.i) that would ensure avoidance of any potential noise impacts to nesting California gnatcatchers. Regarding lower sensitivity species, there is no requirement to update surveys, nor has there been a change in conditions or a known range expansion that would discredit the results of previous surveys.

An updated field survey was conducted in August 2009 to verify that the biological resources map previously prepared for the proposed project is still accurate. The 2009 updated survey confirmed there have not been significant changes in the vegetation communities on the property since the previous mapping effort. Updated focused surveys for sensitive species were not conducted. However, the distribution of sensitive species was not observed to have changed from the distribution described in the RDEIR. The plant species composition of the vegetation communities on the project site was similar to or the same as the baseline conditions. Therefore, it is reasonable to expect wildlife species composition to be similar to or the same as the composition that was previously documented. The Final EIR has been revised to include a discussion of the August 2009 survey.

Finally, both USFWS and CDFG reviewed the biological analysis as recently as April 2008 (RDEIR 2008), and neither agency requested updated surveys. Please see RDEIR comment letters A and C.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment IB-2:
Several biological investigations have been conducted on the project site subsequent to the Cedar Fire and Witch Creek Fire. A post-fire assessment was done in November 2003 to assess the vegetative damage and potential for recovery, an oak tree inventory was done in May 2006, and field reviews of County Jurisdictional Wetlands were done in June 2006 and July 2007 (see Table 1 of the Biological Report in Appendix B). In addition, an updated field survey was conducted in August 2009 to verify that the biological resources map previously prepared for the proposed project is still accurate.

As stated above, the 2009 updated survey confirmed there have not been significant changes in the vegetation communities on the property since the previous mapping effort. Updated focused surveys for sensitive species were not conducted. However, the distribution of sensitive species was not observed to have changed from the distribution described in the RDEIR. The plant species composition of the vegetation communities on the project site was similar to or the same as the baseline conditions. Therefore, it is reasonable to expect wildlife species composition to be similar to or the same as the composition that was previously documented.

In 2009, areas on the project site that would be impacted by camp expansion and that also contained closed canopy chaparral (where the species could occur) were thoroughly surveyed. These surveys were negative. While surveys of closed canopy chaparral on steep slopes to the west were less intensive, they should have detected populations of Encinitas baccharis or Lakeside lilac if they were present. While either species may recover from fire effects, neither is known to expand or colonize in the aftermath of fire. Also, one of the easternmost populations of Encinitas baccharis occurs west of the site, so the site itself may be outside of this species' range which reduces the potential for occurrence under any conditions. Finally, the western areas that support the majority of the suitable habitat for these species would not be impacted by the project. These areas would be dedicated and managed as open space. Please also see RDEIR response to comment IB-1.

Response to Comment IB-3:
The comment references the need to prepare a wildlife tracking study "for purposes of a wildlife corridor analysis" and suggests using the study by the "San Diego Tracking Team's Animal Activity Assessment" (Tracking Report). However, the Tracking Report itself focuses only on linkages not corridors. The County does not dispute the fact that the project site supports a corridor.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment IB-3: (cont'd.)
The RDEIR describes the methodology used for the corridor analysis and the results of the analysis (Appendix B, page 15). The methodology used existing GIS data and general biological fieldwork. This methodology is consistent with methods used to identify regional corridors for the MSCP and was supplemented with site-specific analysis. Moreover, the Wildlife Agencies reviewed both the DEIR and RDEIR and did not comment on the methodology used for the corridor analysis. Please see RDEIR comment letters A and C.

Under Reduced Project Alternative I, over 68 percent of the project site (the western portion) would be preserved in open space. In addition, expansion of the existing campground adjacent to existing facilities (within the eastern portion of the site) would not preclude or significantly inhibit wildlife movement through the property. Reduced Project Alternative I would not preclude continued east-to-west or north-to-south wildlife movement through the property.

The County reviewed the Tracking Report provided in the comment. While the County appreciates the information, the document lacks scientific validity due to biases associated with the methodology and unsupported conclusions. Furthermore, the data provided in the Tracking Report was not collected on site. It does not identify non-random movement patterns and, thus, cannot form the basis for a delineation of a "regional habitat linkage." The document does not quantify the number of tracking nights (duration of study) at each transect (established data collection locations). The transects used in the study, vary in length, width, habitats, and seasons. Therefore, these transects cannot be compared to one another. In addition, many of the transects are laid out with segments that form a loop or are side-by-side which is likely to result in an over-estimation of the wildlife usage of an area. In order to draw a scientifically valid conclusion from a set of data, the study should include a control or reference transect site. This control transect site would be used to compare each data set. The Tracking Report did not contain an established control or reference transect site, nor did it include a thorough discussion of the methodology used to determine the transect site used in the study. The Tracking Report includes unvalidated observations from 17 years ago in its table of "summary of track and sign survey results." This table also includes species for which only a carcass was identified (mule deer) without current tracks. There is no explanation of how the tracking results lead to the conclusions of linkage delineation. Evidence of wildlife presence or movement at any

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Response to Comment IB-3: (cont'd.)
intensity is insufficient to identify a linkage; therefore, this report fails to provide support for delineation of a linkage.

The Tracking Report concludes that there is evidence of east-west wildlife movement from two single sampling points (Transects 2 and 3), but this does not form the basis for delineation of a "regional habitat linkage." A linkage analysis would require multiple sampling points throughout and outside of the linkage to establish the level of wildlife movement within and outside of an area for comparison. Wildlife movement can occur in any area and many areas may serve as foraging areas or lie along the boundaries of a territory (subject to defense and marking which can require daily movements), but these areas could fail to qualify as a linkage. The Tracking Report also refers to a "north-south trending natural corridor (and habitat linkage)" at the base of Iron Mountain, but again there is no support for this assertion from the report's data or from a topographical or habitat based analysis of the region. The Tracking Report's assertion that tracks within Transects 1, 3, 5, and 6 provide evidence of a north-south corridor is not valid. The movement detected at Transect 1 may be related to mammals transitioning in and out of the West Fork Corridor defined in the northern portion of the Salvation Army Camp site. Similarly, movement detected at Transect 3 is likely part of that same West Fork Corridor that trends north south paralleling Mussey Grade Road. Lastly, movement across Transect 6 is likely reflecting north-south movement into the San Vicente Open Space Preserve from the local corridor that trends east-west in line with corridor segments 6.1 and 6.6, but it may not indicate continued north-south movement across agricultural lands and hilltops into the Salvation Army Camp's proposed impact area.

The repeated references in The Tracking Report to a "habitat linkage" are also inaccurate in the context of the MSCP and BMO requirements. The Tracking Report provides the BMO definition for linkage, put provides no evidence of the project site meeting the definition. The Tracking Report's assertion that "The Salvation Army land lies within a BCRA and habitat linkage area and proposes impacts (direct or indirect) to most of the woodland-chaparral and woodland-grass habitats onsite" is incorrect. The site is not in a habitat linkage as defined by the BMO, and development of the project would not impact most of the woodlands or chaparral on-site. The terms "woodland-chaparral and woodland-grass habitats" are not biologically valid as they indicate a mixture of two distinct habitats. If these references refer to the edges of the two habitats, the conclusions remain incorrect for chaparral-woodland edge, which is

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Response to Comment IB-3: (cont'd.)
largely preserved and are misleading for grassland-woodland edge, which lies entirely within the existing use area or within proposed open space. Since this initial assertion is faulty, the Tracking Team report's conclusion that, "The Salvation Army project, as currently proposed, would pose a significant impact on the north-south and east-west regional habitat linkage by concentrating development in ecotanal woodland-chaparral and woodland-grass habitat areas known to be particularly valuable for wildlife," is also invalid.

Response to Comment IB-4:
Please see RDEIR response to comment I-18.

Response to Comment IB-5a:
Please see RDEIR response to comment I-19.

Response to Comment IB-5b:
As amended in 2007, the definition of a RPO "wetland" is as fallows (County Code section 86.601 et seq.):

> "Lands having one or more of the following attributes are 'wetlands':
>
> a) At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places);
>
> b) The substratum is predominantly undrained hydric soil; or
>
> c) An ephemeral or perennial stream is present, whose substratum is predominantly non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system."

The RPO also includes exceptions to the definition above, which are related to areas that meet that definition above but exist solely due to man-made structures (e.g., culverts, etc,) and lands that have been degraded by past legal activities. These exceptions do not apply to the Central Camp Tributary Drainage or the Southern Camp Drainages.

The Central Camp Tributary Drainage and the Southern Camp Drainages do not meet the current definition of a wetland in the RPO because:

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Response to Comment IB-5b: (cont'd.)

a) These areas do not support a predominance of hydrophytes;

b) These areas do not contain hydric soils; and

c) These areas, ephemeral drainages whose substratum is non-soil (rock lining) interspersed with accumulated non-hydric soils, do not contribute to the biological functions or values of wetlands in the drainage system for the following reasons:

- Their lack of soil and or soil at depth and absence of hydrophytic vegetation results in no groundwater recharge, toxicant retention, or nutrient transformation.
- Sediment retention is typically low and temporary, being swept downstream in higher flows.
- Their sole hydrologic function is water conveyance, which would continue to occur through sheet flow even in the absence of the drainage.

Comment Letter IB 2 (cont'd.)

statements. Furthermore, the 2007 RPO definition of wetlands only makes reference to using "negligible biological function or value" to exclude an area as wetland for "lands that have wetland attributes solely due to man-made structures (i.e., culverts, ditches, road crossings, agricultural ponds)". These onsite drainages do not exist solely due to man-made structures. They also have not been degraded by *past legal land disturbance* activities to the point that they 1) have negligible biological function or value *even if restored to the extent feasible*. The RDEIR interpretation of RPO wetlands is faulty and does not adhere to the 2007 RPO wetland definition. IB-5 b (cont'd.)

General Comments

The focused surveys for all sensitive plant and wildlife species are outdated, as they were conducted between 1999 and 2001. Additionally, ecological conditions in the immediate area are significantly different because of the recent Cedar fire in October 2003 and the variation in climatic conditions over the last 9 years. Substantial new information will have to be reported to comply with California Environmental Quality Act (CEQA), Federal Endangered Species Act (FESA), and California Endangered Species Act (CESA) requirements. The U.S. Fish and Wildlife Service (USFWS) typically considers all threatened and endangered (T&E) species surveys to be valid for only one year following completion of protocol surveys, and 2 to 3 years for all other species surveys. The California Department of Fish and Game (CDFG) has similar standards and will also require updated focused sensitive species surveys. This substantial new information should be publicly disclosed and a new draft EIR recirculated for public comment. IB-6

Current focused/protocol surveys will need to be conducted for listed wildlife species with a potential for occurring onsite or *within 500 feet of the parcel boundaries* (because of the potential for indirect impacts). These species surveys should include California gnatcatcher, least Bell's vireo, Stephen's kangaroo rat, arroyo toad, and Quino checkerspot butterfly. Current focused surveys should also be provided for other sensitive wildlife species (e.g., bats, reptiles, raptors including golden eagle, and other sensitive avian species). IB-7

An updated focused survey for all potentially occurring rare plant species should be conducted. The high rainfall this 2004/2005 rainy season has resulted in display of more plant species in many areas than found over the previous several years of drought. Particular attention should be focused on Encinitas baccharis (federally and state listed) and lakeside lilac. Encinitas baccharis has a high likelihood of occurrence on the property given that it is known from Iron Mountain and suitable habitat exists onsite. Furthermore, this species is extremely difficult to detect in dense chaparral even if surveys are conducted during the appropriate blooming period due to its cryptic appearance, growth habit within and sometimes under dense brush, and the impenetrable nature of mature chaparral. Encinitas baccharis responds with increased numbers and density after wildfire and is much easier to detect after the habitat has opened up post-fire and become accessible on foot. Similar parameters apply to lakeside lilac, which is also known from the Iron Mountain foothills and also responds well to wildfire. IB-8

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Response to Comment IB-6:
Please see RDEIR response to comment IB-1.

Response to Comment IB-7:
Please see RDEIR responses to comments IB-1 and IB-2. The comment does not explain why surveys need to be done 500 feet outside the project property. The County's mapping guidelines for biological resources require vegetation mapping 100 feet outside the property line, which can be done from the project site. There is no requirement for surveying off site unless the project would cause direct impacts off site. Vegetation maps in Final EIR Section 2.2 Biological Resources show that off-site vegetation was mapped appropriately. In the case of the Salvation Army property, the vegetation types off site within 100 feet of the property line are continuations of the same vegetation types on the property and biological resources within that off site area would not vary substantially from those on site.

The analysis in the EIR includes an assessment of all potential direct and indirect impacts to sensitive biological resources resulting from the project. The analysis included a search of the California Natural Diversity Database to identify historic observations of sensitive species within and adjacent to the project site.

Response to Comment IB-8:
Please see RDEIR responses to comments IB-1 and IB-2.

A wildlife movement study based on field data collection using a sound research design and trained wildlife trackers is essential to adequately evaluate corridor and linkage impacts. The RDEIR and Biological Report claim to have done a corridor map analysis, however no field data or map analyses are presented to support the conclusions. IB-9

The County requires mapping of wetland buffers of a minimum of 25 feet and a maximum of 200 feet depending on a number of factors, which are listed in the County's Biological Mapping Requirements. The County's 2007 RPO requires a wetland buffer of between 50 to 200 feet. Presumably, if all of the factors are positive, the maximum buffer width of 200 feet would be most appropriate. These include 1) existence of hydrophytic vegetation, 2) high quality condition of the existing wetland, 3) wetland/buffer serves as a wildlife corridor, 4) existence of sensitive species, and 5) connectivity and high quality condition of the wetland up and down stream. Even for the areas in which all of the factors listed have been determined positive, as shown in the Biological Technical Report, a buffer width of only 100 feet is provided. Additionally, the buffer analysis does not provide evidence for a lack of wildlife corridors, sensitive species, and high quality/condition of habitat for those wetlands displaying lower values. **The validity of the buffer analysis is questionable, as is the appropriateness of the buffer widths to protect the environmental and functional habitat values of the wetlands.** IB-10

Given the onsite conditions, the maximum buffer width of 200 feet should be applied to the West Fork and tributary drainages. The Central and South Camp drainages also contain coast live oak riparian forest, and should maintain a substantial buffer to adequately protect these wetlands. The buffer needs to be of an appropriate size to be integrally important in supporting the full range of wetland and the adjacent upland biological community. These buffer areas are currently only shown as having a 50-foot buffer width.

Attachment A of the California Department of Fish and Game (CDFG) letter was missing from the RDEIR. This attachment provides the list of Rare Natural Communities, which CDFG requires be fully avoided by the project. IB-11

MSCP Findings of Conformance

It is stated in the EIR and Findings of Conformance that the project site is located within the Multiple Species Conservation Program (MSCP), outside of any pre-approved mitigation area. This statement is incorrect for two reasons. A portion of the site is within the MSCP pre-approved mitigation area in the southwest corner of the site (refer to map on last page of Findings). IB-12 Secondly, the Salvation Army property is fully encompassed within a preserve acquisition area identified by CDFG and the County in the Conceptual Area Acquisition Plan (CAAP) for Iron Mountain Ridge – Canada de San Vicente Preserve. The CAAP was approved and adopted by the County and CDFG in 1999. The CAAP, in conjunction with the MSCP, has resulted in the acquisition of approximately 2,714 acres of habitat bordering the Salvation Army property. The IB-13

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Response to Comment IB-9:
Please see responses to comments I-18 and IB-3.

Response to Comment IB-10:
The Resource Protection Ordinance defines "Wetland Buffer", in part, as "Lands that provide a buffer area of an appropriate size to protect the environmental and functional habitat values of the wetland, or which are integrally important in supporting the full range of the wetland and adjacent upland biological community. Buffer widths shall be 50 to 200 feet from the edge of the wetland as appropriate based on the above factors." (County Code section 86.601 et seq.). The comment's assumption that a positive determination for each of the buffer determination factors triggers application of the maximum buffer is incorrect. If that methodology were applied throughout the County small ephemeral streams within local wildlife corridors could be subject to the same buffer widths as a regional river corridor (i.e., 200 feet). The comment's assumption fails to conform to the RPO definition as the functions and values of an ephemeral stream within a local corridor are vastly different than a perennial water body within a regional corridor and thus variations in buffering are biologically appropriate. The buffers identified in the EIR meet the criteria established in the County of San Diego Guidelines for Determining Significance (July 2008). Specifically: "A wetland buffer of 50-100 feet is appropriate for moderate to high quality RPO wetlands which support a predominance of hydrophytic vegetation or wetlands within steep slope areas (greater than 25 percent) with highly erosive soils. Within the 50-100-foot range, wider buffers are appropriate where wetlands connect upstream and downstream, where the wetlands serve as a local wildlife corridor, or where the adjacent land use(s) would result in substantial edge effects that could not be mitigated." The buffer widths of 50 to 100 feet are appropriate for wetlands on the site. Per the Guidelines, wetland buffers of 100-200 feet are appropriate for RPO wetlands within regional wildlife corridors or wetlands that support significant populations of wetland-associated sensitive species or where stream meander, erosion, or other physical factors indicate a wider buffer is necessary to preserve wildlife habitat. The project site does not have the conditions that would require a buffer wider than 100 feet.

Regarding the assertion of a failure to provide evidence for a lack of wildlife corridors, sensitive species, and high quality habitat, the RDEIR Biological Report provides a wildlife corridor analysis, maps of all sensitive species found on-site and an assessment

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Response to Comment IB-10: (cont'd.)
of the potential for other sensitive species (Appendices 4 and 5 of the Biology Report) along with their habitat, and an analysis of jurisdictional wetland functions and values.

Response to Comment IB-11:
The RDEIR did not include the CDFG letter noted in the comment; however, biological survey reports from the immediate area and California Natural Diversity Database (CNDDB) records were reviewed for the presence of sensitive biological resources (CDFG 1997 and 2006, PSBS 1993, Merkel & Associates 2001, Scheidt 1997). (See Final EIR Appendix B.)

Response to Comment IB-12:
A small section in the southwestern corner of the subject property is located within a Preapproved Mitigation Area. However, this area is located outside of the project footprint and within an area that is proposed for preservation. The Final EIR has made this correction on page 2.2-11.

Response to Comment IB-13:
Comment noted. The Salvation Army parcels are identified in the Conceptual Area Preservation Plan (CAPP). The intent of this comment appears to be that the Salvation Army property is worthy of preservation. Regardless of the fact that the parcels are identified in the CAPP, lands are acquired only from willing sellers; property owners are not obligated or required to sell their property. The Reduced Project Alternative I that is being taken forward would preserve over 68 percent of the Salvation Army site in open space.

Comment Letter IB 4 (cont'd.)

preserve includes the former Boys and Girls Club property and the Boulder Oaks Ranch, which were identified in the CAAP as the top two acquisition priorities. The Salvation Army property along with several other parcels, collectively referred to as the Iron Mountain Palisades – Golden Eagle Nest Area, are identified in the CAAP as the third acquisition priority for the preserve. IB-13 (cont'd.)

The following discussion is relevant to the **Design Criteria for Linkages and Corridors, numbers 1 to 10**. Within the MSCP Findings of Conformance, a serious error is made by concluding that the Salvation Army property does not contain a habitat linkage. The justification for this assumption was that the property was not identified as a biological core and linkage area in the Subarea Plan. However, the Findings of Conformance require that habitat linkages, as defined by the BMO, rather than just corridors, be maintained. Linkage is defined in the BMO as "an area of land which supports or contributes to the long-term movement of wildlife and genetic material." IB-14

A wildlife movement study based on field data collection has not been conducted. The RDEIR and the Biological Technical Report claim to have done a corridor map analysis, however no field data or map analyses are presented to support the conclusions. The Alliance urges the DPLU to require a wildlife tracking study be conducted for purposes of a wildlife corridor analysis, or, alternatively, use the independent study conducted by the San Diego Tracking Team and submitted by the Alliance (attached).

The east-west travel route along the tributary creek will be impinged on by improvements to the main road into the facility plus a dramatic increase in number of daily trips on this road. The north-south travel route will be impinged by development wrapping around the lower slopes of the central hill and extending through the broad, wooded valley to the south. Therefore, the MSCP Findings of Conformance cannot be supported.

The BMO Project Design Criteria (page 5, number 1) require that project development shall be sited in areas to minimize impact to habitat. **The BMO Preserve Design Criteria and Subarea Plan Findings** require measures to maximize the habitat structural diversity of conserved habitat areas (page 6, number 2; page 13, number 2); provide for the conservation of spatially representative examples of coastal sage scrub and other high value habitats (page 7, number 3; page 12, number 3); and provides for development in the least sensitive habitat areas (page 7, number 5; page 13, number 5).

The Findings state that the project design has minimized impacts to habitat given the amount of land to be protected and the avoidance of the more sensitive vegetation types (**BMO Criteria 1**); and that development has been focused on the habitat types with the lowest sensitivity (**Preserve Design Criteria 5**). A detailed habitat area based analysis indicates otherwise. The Findings report: "The project will impact a total of 73.74 acres of habitat." What is not stated is that 28.57 acres or 39% of the lands impacted include the most sensitive habitat types (Tier-1 and Tier-II). Only 15% of the lands to be conserved, i.e., left undeveloped, contain the most sensitive habitat types (Tier-I and Tier-II). The development is clearly concentrated in the highest quality, most sensitive habitat areas. One-third (34%) of all coast live oak woodland habitat (Tier I) mapped on IB-15

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Response to Comment IB-14:
There is no 'linkage' on the project site. Moreover, no significant increase in the anticipated number of daily trips on the access road is expected to occur during the night and early morning when wildlife movement through the corridor would be the highest (Final EIR, Section 2.2.3.5). Please see RDEIR responses to comments I-19 and IB-3.

Response to Comment IB-15:
The County acknowledges that the project would result in impacts to Tier I and Tier II habitats. These Tier I and Tier II habitats are generally isolated and located within the camp's existing use areas. Development of the new camp facilities would be located adjacent to existing development and associated infrastructure in order to allow for preservation of the large area of undeveloped habitat located in the western portion of the project site. Furthermore, the impacts to all sensitive habitats, including Tier I and Tier II habitats, would be mitigated in accordance ratios required by the BMO (County Code section 86.501 et seq.) through preservation of over 68 percent of the property in open space (see the table on the following page).

With regard to the comment on wetland impacts, no impacts to wetlands would result from brush clearing for fire protection. Development of new camp facilities would not result in impacts to wetlands under Reduced Project Alternative I. Realistically, with hundreds of campers on site, complete avoidance of all wetlands located in the active use areas of the interior of the camp is not feasible. Therefore, impacts from foot traffic have been assumed to be significant and have been mitigated.

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Response to Comment IB-15: (cont'd.)

Habitat Tier (I-IV)	Vegetation Communities	Alternative Plan I or II Impacts (acres)	Impacts as % of Existing On-site Vegetation Community	Open Space Easement (acres)	Open Space Easement as % of Existing On-site Vegetation Community
I	Southern Willow Scrub	0.00	0.0%	0.74	100%
I	Mule Fat Scrub	0.00	0.0%	0.02	100%
I	Emergent Wetland	0.00	0.0%	0.01	100%
I	Southern Coast Live Oak Riparian Forest	1.36	4.0%	27.36	81.4%
I	Coast Live Oak Woodland	7.96	39.1%	3.65	17.9%
I	Mafic Southern Mixed Chaparral	0.00	0.0%	6.42	100%
Tier I Habitats Combined		**9.32**	**15.2%**	**38.20**	**62.4%**
II	Diegan Coastal Sage Scrub	12.29	74.8%	4.60	28.0%
II	Coastal Sage-Chaparral Scrub	8.18	17.7%	30.17	65.3%
Tier II Habitats Combined		**20.47**	**32.7%**	**34.77**	**55.5%**
III	Southern Mixed Chaparral	36.73	9.1%	318.30	79.1%
III	Non-Native Grasslands	12.41	54.4%	0.81	3.5%
Tier III Habitats Combined		**49.14**	**11.6%**	**319.11**	**75.0%**
IV	Non-Native Woodland	1.63	37.1%	0.01	0.2%
IV	Disturbed	9.37	56.5%	3.31	20.0%
IV	Urban/Developed	4.72	60.8%	0.17	2.2%
Tier IV Habitats Combined		**15.72**	**54.7%**	**3.49**	**12.1%**
Totals		**94.65**	**16.4%**	**395.57**	**68.4*%**

*** A total of 68.4% of the property is preserved in an open space easement, 16.4% is impacted, and the remaining 15.2% is considered impact neutral.**

Comment Letter IB 5 (cont'd.)

the property would be impacted by the project; nearly three-quarters (74%) of all Diegan coastal sage scrub (Tier II) would be impacted by the project. In addition, the project proposes impacts to wetland (Tier 1) habitats that could be avoided (i.e. those resulting from foot traffic and brush clearing). IB-15 (cont'd.)

Although a lower percentage of the high elevation coastal sage /chaparral scrub would be impacted by the project (18%), this habitat does not contain the same value as the lower elevation Diegan coastal sage scrub in terms of potential for California gnatcatcher and other sensitive coastal sage scrub-dependent species. The Diegan coastal sage scrub onsite is a highly diverse and high quality habitat. Some areas contain Engelmann oak woodland interspersed. IB-16

One-third of all coast live oak woodland would be impacted (34%). Note that although a smaller percent of the coast live oak riparian forest acreage would be impacted (4%), a substantial length of the wetlands along this riparian corridor (more than half the total length of the riparian habitat) may be impacted by road improvements including clearing for fire protection and foot traffic. The County required mapping and protection of wetland buffers should be closer to 200 feet rather than 25 feet for this high quality riparian wetland/wildlife corridor. A long span of impact into this wetland would be in conflict with the Preserve Design Criteria.

Regarding Preserve Design Criteria 2 and Subarea Plan Finding 2. The most structurally diverse habitat area onsite is an interconnected mosaic of oak woodlands, wetlands, coastal sage scrub, grasslands, chaparral, and oak riparian forest within the eastern one-third of the project site (see Figure 4-5 in the EIR). This mosaic of the highest quality habitats coincides closely with the development footprint of Alternative 1 as evidenced by the Figure 4-5 in the EIR. Almost the entire structurally diverse habitat area will be developed and/or fragmented (excluding the northeastern corner). The remaining habitats to be left undeveloped are predominantly large blocks of southern mixed chaparral (76%) and other types of chaparral (8% sage scrub/chaparral and 1% mafic southern mixed chaparral). Disturbed and developed lands comprise 3% and more diverse habitats comprise about 12% (northeast corner of property) of the land not currently proposed for development. IB-17

Regarding Preserve Design Criteria 3 and Subarea Plan Finding 3. The project does not adequately conserve spatially representative examples of extensive patches of coastal sage scrub and coast live oak woodland. The extensive patches of classic Diegan coastal sage scrub onsite will be impacted (74% loss). Nearly all of the extensive patches of coast live oak woodland, which occupy the broad valley floor, will be impacted and/or fragmented. One-third of the coast live oak woodland acreage mapped on the site, would be removed by the project. This impact does not include all of the indirect impacts to oak trees through soil compaction within the critical root zone. The only patches of coast live oak woodland that would not be directly impacted, are small isolated fragments of the existing contiguous canopy, which would likely be degraded or lost through indirect impacts (see Figure 4-5 in the EIR). IB-18 IB-19 IB-20 IB-21

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Response to Comment IB-16:
Gnatcatcher surveys have been conducted and were negative. Please see RDEIR response to comment I-15.

The comment is addressing coast live oak riparian forest located along the existing camp access road. Only limited road widening has been incorporated into the project to avoid direct impacts to County wetlands and oaks from road improvements. While fire clearing along roadsides would result in impacts to oak woodlands, clearing would be conducted only within 30 feet of roadway edges, would consist solely of understory clearing and would not involve removal of oak trees.

Under the Applicant's Preferred Project, impact to this area of coast live oak riparian forest would be greatly increased. The Reduced Project Alternative I and II relocate the Retreat Center to the south to avoid these impacts. Other than areas along the road impacted as a result of fire clearing, the coast live oak riparian forest and adjacent areas would be preserved in open space. The project would be conditioned to provide fencing and signage to prevent intrusion into the open space areas. Therefore, no impacts due to foot traffic should occur.

A 200-foot buffer is not required. As discussed above, aside from roadway improvements and associated fire clearing, the coast live oak and riparian forest and adjacent areas would be preserved in open space. All proposed camp facilities would be located more than 200 feet from this area. See response to comment IB-10.

Pursuant to BMO Attachment G, the Preserve Design Criteria do not apply to the project because the project site is not located within the Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Sub area Plan Map (County Code section 86.505(a)(5)). A small section in the southwestern corner of the subject property is located within a Preapproved Mitigation Area. However, this area is located outside of the project footprint and within an area that is proposed for preservation.

Nonetheless, the project would not conflict with the Preserve Design Criteria. Specifically, the project would not cause a loss of wetlands; habitat structural diversity will be maintained; the project creates significant blocks of habitat for preservation with minimal edge; the project focuses development in association with existing disturbance and away from more sensitive areas; the project avoids and minimizes impacts to

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Response to Comment IB-16: (cont'd.)
narrow endemics; it does not affect a linkage; and achieves conservation goals for covered species.

Response to Comment IB-17:
Please see RDEIR response to comment IB-16. The area which the comment considers the most structurally diverse (eastern one-third of the project site) is also the location of the current Salvation Army Camp facilities. It is a widely accepted method of avoiding edge effects and minimizing biological impacts to cluster development, as proposed under the RDEIR. In addition, the most structurally diverse area of the eastern one-third of the project site occurs in the northern portion of the site where open space is proposed over riparian forest, coastal sage scrub, coastal sage chaparral scrub, southern mixed chaparral, grasslands, southern willow scrub, and emergent wetland. Lastly, remaining habitats left undeveloped (and preserved) are (as stated) predominantly chaparral, but this reflects the site's natural vegetation and allows for connectivity with off-site preserve lands and preservation of the local wildlife corridor. In addition, development is proposed in the flattest portion of the site. Development at other locations on site would result in steep cut slopes and large amounts of fill for building pads resulting in impacts to much more vegetation than is proposed with the current siting.

Response to Comment IB-18:
Please see RDEIR response to comment IB-16. There are no extensive patches of coastal sage scrub on-site, and the majority of the project site is mapped as low or medium value, except where Tier I habitats were identified during MSCP planning. The largest patch on the site is 4.5 acres, and the only other patch approaching this size is 3.3 acres. A total of 3 other soge scrub patches range from 1.0 acre to 2.0 acres, and all the remaining areas are less than 1.0 acre.

Response to Comment IB-19:
Please see RDEIR response to comment IB-16. The majority of the existing oak woodland canopy lies within the existing camp use area. The biological value of these oaks has been compromised by existing uses and thus, they would not provide for a good spatially representative example of this habitat. Also, while included as a project impact to oaks, impacts related to clearing of the oak understory for fire protection would not result in removal of oak trees within the project site.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment IB-20:
The analysis of impacts to oak woodlands includes indirect impacts that would occur as a result of any ground disturbance or placement of impervious surfaces within 25 feet of the root zone. All indirect impacts to oaks have been addressed in the EIR.

Response to Comment IB-21:
Please see RDEIR response to Comment IB-19. In addition, most of the areas of coast live oak woodland designated for preservation are far from the proposed development and would not be subject to indirect impacts. Oaks within the open space would be managed as part of the open space to which access would be restricted. Therefore, these oaks should not be "degraded or lost" as stated in the comment.

Comment Letter IB 6 (cont'd.)

Subarea Plan Findings 7 requires special emphasis on conserving adequate foraging habitat near golden eagle nest sites. The project lies less than a mile away from a known golden eagle nesting site. The project site currently provides a significant foraging area when the onsite habitat is combined with the contiguous meadows of Boulder Oaks Ranch, Wildwood Ranch, and Golden Eagle West Ranch. This is the closest foraging habitat available to the nest site and has been recognized as an important foraging area by monitoring of this pair. IB-22 More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. Open grassland habitats are valuable for eagle foraging, contrary to the conclusions made in the RDEIR; whereas the native closed canopy shrub lands would be of less critical importance for foraging. IB-23

Conclusion. Given the above stated facts and the serious flaws in the analysis for the MSCP Findings of Conformance, the project cannot be considered viable.

MSCP Conformance Findings cannot be made for the following reasons:

- The regional habitat linkage made up by both north-south and east-west wildlife movement corridors has not been maintained (Design Criteria for Linkages and Corridors 1-10)
- Project development is not sited in areas to minimize impact to habitat (BMO Criteria 1)
- Habitat structural diversity of conserved habitat areas is not maximized (BMO Preserve Design Criteria 2 and Subarea Plan Findings 2) IB-24
- Conservation of spatially representative examples of coastal sage scrub and other high value habitats are not provided (BMO Preserve Design Criteria 3 and Subarea Plan Findings 3)
- Development is not focused in the least sensitive habitat areas (BMO Preserve Design Criteria 5 and Subarea Plan Findings 5)
- Special emphasis has not been placed on conserving adequate foraging habitat near golden eagle nest sites (Subarea Plan Finding 7)

Alternatives I, II, and proposed project each fail to meet the standards necessary to conform to the BMO Project Design Criteria and Design Criteria for Linkages and Corridors, and to conform with the objectives of the County MSCP Subarea Plan.

The BMO applies to all land in the County within the boundaries of the MSCP, and the BMO applies to discretionary projects subject to CEQA, such as the proposed project. "No project requiring a discretionary permit shall be approved unless a finding is made that the project is consistent with the MSCP Plan, The County Subarea Plan, and the provisions of this Ordinance." (BMO, Article II.) No such findings can be made, therefore, this project cannot be approved.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment IB-22:
A golden eagle report was prepared for the project by the organization that leads the golden eagle monitoring in the vicinity of the project site (Biological Report Appendix 10). The report does not conclude that the site is a "significant foraging area" and did not find the site to be "an important foraging area." The report acknowledges that "the open areas of the Salvation Army Camp are part of an area used by the eagles to hunt." It also acknowledges that direct disturbance and impacts to foraging habitat are the two largest concerns from the project. However, the proposed buildings have been clustered near the existing facilities, which minimize impacts to biological resources. In addition, subsequent to the preparation of the golden eagle report, the project was redesigned to remove trail access toward the eagle nest and to expand the proposed open space, which would preserve more foraging area for eagles.

Response to Comment IB-23:
Open grasslands do serve as important areas for golden eagle foraging; however, a significant level of foraging is not anticipated within the project site's grasslands as they are almost exclusively located in the existing camp use area. They occur in patches between existing buildings and roadways and many are part of a Frisbee golf course. They are used throughout the year for outdoor activities. The high level of existing human activities within the Camp's existing grasslands is expected to limit the use by eagles.

Response to Comment IB-24:
Comment noted. Issues raised in this comment are addressed in preceding RDEIR responses to comments IB-1 through IB-23. Specifically, see response to comments IB-3, IB-4, and IB-14 for a response to the first bullet regarding Design Criteria for Linkages and Corridors 1-10. See responses to comments IB-15, and IB-19 for a response to the second bullet regarding BMO Criteria 1. See responses to comments IB-3 and IB-17 for a response to the third bullet regarding BMO Preserve Design Criteria 2 and Subarea Plan Finding 2. See responses to comments IB-18 – IB-21 for a response to the 4th bullet regarding BMO Preserve Design Criteria 3 and Subarea Plan Finding 3. See response to comment IB-15 for a response to the 5th bullet regarding BMO Preserve Design Criteria 5 and Subarea Plan Finding 5. See responses to comments IB-22 – IB-23 for a response regarding Subarea Plan Finding 7. In addition, see responses to comments I-19 and IB5a regarding the Reduced Project Alternative I's conformance to the BMO Project Design Criteria and Design Criteria for Linkages and Corridors and the County's MSCP Subarea Plan.

Comment
Letter IB . 7
(cont'd.)

Specific EIR Comments

The following comments are made in reference to the DEIR page numbers; however, the comments are still relevant to the RDEIR as complete corrections have not been made in response to these comments. IB-25

Page 2.2-1 and Figure 2.2-1. No Engelmann oak woodland as a habitat type was mapped or described despite some of the habitat onsite containing substantial numbers and cover of this species, if not a dominance. Please explain.

Page 2.2-6 Sensitive Plant Species. There is no mention of sensitive plant species that have a potential to occur onsite, but that were not detected during surveys, such as Encinitas baccharis and Lakeside lilac, among others. It is misleading to presume that sensitive species not found during surveys do not occur onsite. Please add a discussion of these species and a description of the survey limitations. IB-26

Page 2.2-7 Sensitive Wildlife Species. There is no mention of sensitive wildlife species that would have a potential to occur onsite, but that were not detected during surveys, such as bat species, ringtail, and mountain lion, among others. It is misleading to presume that sensitive species not found during surveys do not occur onsite. Please add a discussion of these species and a description of the survey limitations. IB-27

Page 2.2-9 Wildlife Corridors. No wildlife movement studies were done. The primary argument made in the EIR wildlife corridor section is that there is insufficient habitat connectivity to the north, east, and south for a regional corridor to exist. There is no evidence to substantiate this claim.

The author of these comments is a professional biologist of 20 years and was a founding member of the Iron Mountain Conservancy Tracking Team (1995-99) and subsequently a founding member of the Mount Woodson Wildlife Trackers (1999 to present). The following analysis is based on current aerial photographs, USGS topographic maps, and regional vegetation mapping. Additionally recent field visits to surrounding properties and several years of wildlife tracking and hiking in the region (including the Salvation Army property), indicate the following results. IB-28

The Salvation Army property is bordered by unencumbered open space around most of its perimeter and provides an important regional connection between existing large blocks of open space. The few scattered residences in this area along Mussey Grade Road have little effect on north-south movement of wildlife, but have some effect on restricting east-west movement to key drainages that connect Iron Mountain Open Space via Salvation Army to the large blocks of open space to the east. Existing ranchland and equestrian uses on adjacent properties do not block the major wildlife travel routes. The Salvation Army property clearly and undeniably contains a regional habitat linkage. IB-29

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment IB-25:
No single oak woodland habitat area is dominated by Engelmann oaks; therefore, no areas on site warranted the classification as Engelmann oak woodland. The Engelmann oaks occur in small clusters around existing buildings and as individuals within coastal sage-chaparral scrub and grasslands. The densest area of Engelmann oaks consists of five trees mingled with coast live oaks within a 0.25-acre oak woodland area between existing buildings and roadways.

Response to Comment IB-26:
Sensitive plant species with potential to occur on site (but not detected) are addressed in the Biological Report Appendix 4 including their potential for occurrence or reason for not being expected to occur.

Response to Comment IB-27:
Sensitive wildlife species with potential to occur on site (but not detected) are addressed within Biological Report Appendix 5 including their potential for occurrence or reason for not being expected to occur.

Response to Comment IB-28:
Please see RDEIR responses to comments I-18, I-19, and IB-3.

The tracking work that was done is not a defendable methodology for delineating a linkage. The County does not question the tracker's ability or experience. However, the study presented is flawed. It fails to prove that wildlife movement is along particular corridors and is not random. Furthermore, over 68 percent of the property will remain in open space that will allow unimpeded wildlife movement.

Response to Comment IB-29:
Please see RDEIR responses to comments I-18, I-19 and IB-3. The Reduced Project Alternative I would preserve approximately 68 percent of the subject property by clustering the proposed expansion of the campground and locating new facilities adjacent to existing facilities and roadways. The north-south corridor for wildlife movement through the site would be maintained as the western portion of the project site would be preserved in open space (Final EIR Figure I-2). In addition, wildlife movement in an east-west direction would not be precluded and would not be significantly inhibited because the project includes open space in the northeastern and southeastern corners of the property. Development has been clustered and placed

Comment Letter IB (cont'd.) 8

The EIR only discusses one wildlife corridor. However, an important set of corridors on the Salvation Army property form a regional habitat linkage. This linkage is encompassed by the valleys and lower slopes of oak woodland, coastal sage scrub, grassland, and chaparral along the eastern portion of the site. These valleys and lower slopes connect offsite habitats to the north from Dos Picos County Park, and Golden Eagle Ranch West with the offsite habitats to the south on the Boulder Oaks Ranch Preserve (via two routes: Wildwood Ranch and the Heller/Meador Ranches). An interconnected series of broad, wooded meadows extend through all of these properties and then drop down via the steep Foster Canyon into MSCP Preserve (former Boys and Girls Club), San Vicente Reservoir open space and beyond. The Salvation Army linkage is also important because it helps maintain the broader east-west connections between Iron Mountain and undeveloped high quality habitats extending east of the West Fork of San Vicente Creek ultimately into the BLM open space, Monte Vista Ranch, Barona Indian Reservation, Oak Oasis Park, Silverwood Wildlife Sanctuary, and Cleveland National Forest. IB-29 (cont'd.)

Onsite movement corridors associated with this linkage include a short portion of the West Fork of San Vicente Creek, the east-west corridor along a tributary creek to the West Fork, and the major north-south wildlife corridor in this region. The onsite portion of this north-south corridor includes a broad valley from the south (wooded meadows and scrub), the lower slopes around a central hill including trails and dirt road, a trail that drops into the tributary creek, and a north-south branch of tributary creek that leads offsite to the north.

The onsite habitat linkage is also important for genetic exchange of plant and animal species on a regional basis, particularly for those species reliant on the lower-lying oak woodland, wetland, coastal sage scrub, and grassland habitats.

These wildlife corridors and habitat linkage must be addressed and thoroughly evaluated. A wildlife movement study based on field data collection using a sound research design and trained wildlife trackers is essential to adequately evaluate corridor and linkage impacts. IB-30

Page 2.2-12. **Analysis of Project Effects and Determination of Significance.** ***Please clarify that indirect impacts to oaks were calculated based on distances from the edge of canopy and not from the trunk (i.e., canopy edge of oak trees within 25 feet from ground altering impact or 20 feet from waterline and other trenching activities).*** IB-31

Please provide a map clearly showing all infrastructure impacts, including permanent and temporary impact zones for trenches, leach fields, other septic and water related infrastructure, improvements to trails or construction of new trails, etc.

Why would there be no substantial change in foot traffic between existing and proposed staff housing? IB-32

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Response to Comment IB-29: (cont'd.)
adjacent to existing facilities in such a way as to maintain open areas for wildlife movement, and the nature of the proposed development (e.g., low-density campgrounds) is such that wildlife could continue to move throughout the property. Therefore, the project would not result in significant impacts to wildlife movement.

Response to Comment IB-30:
A wildlife movement study for this project is not required by CEQA, the MSCP, or the BMO. Please also see RDEIR responses to comments I-17, I-19, and IB-3.

Response to Comment IB-31:
The indirect impacts to oaks were in fact calculated from the edge of canopy and not the trunk; thus they address the root zone sufficiently. The Biological Report states, "Those trees that have their canopy inside or within 25 feet of a ground disturbing/ altering impact are considered impacted."

Response to Comment IB-32:
Figures 2.2-1 – 2.2-11 show the limits of disturbance for the project including infrastructure improvements. No temporary impact zones related to infrastructure improvements, trenches, or leach fields are depicted. All impacts associated with these improvements (and all other project impacts) are considered to be permanent and are within the project footprint, and mitigation for these impacts is proposed. Existing trails and the lookout area at the cross are proposed to remain; however, no new trails are proposed. Regarding the increase of foot traffic where staff housing is proposed, the project has incorporated permanent fencing and signage to protect sensitive areas. .The location of the fencing is illustrated in Final EIR Figure 1-14. The purpose of the fencing and signage is to keep staff out of these areas and, therefore, to avoid impacts to these areas.

Comment Letter IB (cont'd.) 9

Page 2.2-13 Tier I Habitats. It is not clear how impact acreages for oaks were derived. Please explain how indirect impacts were assessed. Were oak trees indirectly impacted through soil compaction and other root zone impacts included in the impact calculations? IB-33

Indirect impacts to oak trees from the unseasonal persistence of water near new leach fields, irrigated landscape, and other water sources needs to be addressed. IB-34

An oak tree inventory, including trunk diameters and canopy widths for both oak tree species should be conducted. How many coast live oak trees will be removed by the project, and how many are expected to be lost over time through compaction, unseasonal water, or other impacts to their root zone? IB-35

How were impacts assessed for the coast live oaks trees that were not mapped within oak woodland habitat? Is it true that certain oak trees were deemed not to have biological value because of understory impacts and were not included in the impact analysis? IB-36

Describe where the wetland impacts will occur and why they cannot be avoided. The project should be designed to avoid impacts to 0.10 acre of wetlands from foot traffic. The ACOE and CDFG generally do not issue permits for wetland impacts that they consider avoidable. IB-37

Page 2.2-15. Sensitive Plant Species. Indirect impacts to Ramona horkelia, Gander's butterweed, and felt-leaved monardella are not adequately addressed. These species populations lie immediately adjacent to the hiking trails that will become heavily impacted by potential use from up to 748 users per day. There are no assurances that there are adequate means to protect them from a heavy stream of camp users. Fencing would impact the populations, but signs and foot stakes would be inadequate to protect the populations from such heavy use. IB-38

Page 2.2-16. Sensitive Wildlife Species.

The impact section is incomplete, as it does not address impacts to all of the sensitive wildlife species detected on the project site, nor to the species that are likely to occur onsite but not detected during surveys. IB-39

Sensitive wildlife species surveys are outdated and would no longer be considered valid by the USFWS and CDFG. Therefore, an accurate impact analysis for sensitive wildlife cannot be completed even if attempted from existing data. Current focused surveys should be conducted for all sensitive wildlife. IB-40

The Salvation Army is part of an important foraging area for golden eagles. More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. The conversion of this important eagle foraging habitat to developed and fragmented lands would be significant. IB-41

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Response to Comment IB-33:
The acreage of all oaks within the project footprint was calculated and discussed as a permanent impact, except for individual oak trees that are already impacted by existing development and camp uses. In addition, as noted in the "Methods" section of the Biological Report, oaks within 25 feet of a ground disturbing impact, but outside the development footprint were considered to be indirectly impacted as a result of the development except along existing roadways where no improvements are proposed. Although oaks may not be removed as a result of fire clearing, removal of the understory was considered to be an impact to oaks and oak woodland. To further clarify, the 25-foot measurement was made from the edge of the oak canopy, and this methodology addresses root zone impacts.

Response to Comment IB-34:
This issue was addressed as any oak with a canopy within 25 feet of proposed ground disturbance (which would include new leach fields) was considered to be impacted. In addition, Section 2.2.3.4 of the Final EIR addresses potential edge effects, including edge effects on oak woodlands resulting from irrigation, soil compaction, and paving in and around oaks. In addition, the leach fields must meet DEH requirements for percolation; therefore, the 25-foot distance from leach fields is adequate. The areas of highest irrigation would be located in the central portion of the site where active sports fields are proposed within the permanent development footprint.

Response to Comment IB-35:
Approximately 55 coast live oak trees (measuring six inches or greater in diameter at breast height) would be directly impacted by development. An additional 92 coast live oak trees were assessed as indirectly impacted, meaning they may be lost due to compaction, irrigation, etc. However, a number of these trees are currently located adjacent to buildings, playing fields, and roads and many are likely to remain following project completion. These trees may continue to survive through acclimatization to less than optimal conditions.

In addition, Impact 2.2.h identified significant direct and indirect impacts to a total of 38 Engelmann oaks, six of which would be preserved with implementation of Reduced Project Alternative I.

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Response to Comment IB-36:
All coast live oak woodland and individual oak trees located within the project development footprint have been mapped as "coast live oak woodland." All trees with a canopy inside or within 25 feet of a ground disturbing/altering activity have been considered to be impacted. Certain oak trees were "deemed not to have biological value" because these trees are located immediately adjacent to existing structures, are isolated from native habitat and are exposed to on-going human activities. These oaks were excluded from the oak woodland impact acreage totals because they are already impacted by the existing camp.

Response to Comment IB-37:
The location of wetland impacts is discussed and shown graphically within the Biological Technical Report (Appendix B). Development of new camp facilities would not result in impacts to wetlands under Reduced Project Alternative I. Realistically, however, with hundreds of campers on site, complete avoidance of all wetlands located in the active use areas of the interior of the camp is not feasible. Therefore, impacts from foot traffic have been assumed to be significant and have been mitigated.

Response to Comment IB-38:
There is no reason to expect that all 615 persons (Reduced Project Alternative I) at the camp would hike to the locations where these species occur; therefore, the potential for indirect effects would be much lower than expressed by the comment. The adjacent preserve lands of Iron Mountain support numerous sensitive species populations, many adjacent to trails. These trails experience much higher levels of use than would ever occur at the project site and do not have foot stakes or signs at sensitive plant locations. Yet, the populations persist at these locations as they do in numerous other preserve areas open to the public. The proposed design features (trail signage and foot stakes) in conjunction with management of the open space are expected to ensure avoidance of human caused impacts as demonstrated at numerous other County locations, such as Tijuana River Valley Regional Park, Del Dios Highlands Preserve, and El Capitan Preserve. Moreover, youth campers would be accompanied by camp staff, and the steep topography would also discourage hikers from leaving the trail.

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment IB-39:
The County does not concur with this comment. The EIR and supporting Biological Technical Report (Appendix B) provides a comprehensive evaluation of the project's potential impacts to sensitive wildlife species detected on-site, as well as species likely to occur on-site but not detected during surveys (refer to pages 67 through 74 of the Biological Report). Please see RDEIR response to comment IB-27.

Response to Comment IB-40:
Please see RDEIR response to comment IB-1.

Response to Comment IB-41:
Please see RDEIR responses to comments IB-22 and IB-23.

Comment
Letter IB 10
(cont'd.)

Page 2.2-16. Edge Effects.

The analysis of edge effects or indirect impacts from the project is inadequate. Numerous adverse effects to biological resources will occur that have not been addressed. A few of these impacts include invasion of exotic species from increased disturbance, erosion of creek banks, sedimentation, runoff, contamination from pesticides, herbicides, nitrates, and other pollutants. Significant impacts would occur from the heavy use of habitats throughout the property by camp users. These impacts should be individually addressed and may include the following: trampling of vegetation; soil compaction; erosion from hiking and biking; collecting of plants and wildlife (such as horned lizards); digging; wood cutting; removal of dead wood and leaves; building dams; use of bright flashlights; nighttime noise; discarding trash; discarding food which facilitates invasion of Argentine ants; urinating and defecating in creeks and other habitat areas; unauthorized shooting, trapping, smoking, camp fires, fireworks, and explosives. IB-42

Page 2.2-17. Pruning oak branches after trenching within their root zone does not reverse the damage done to trees through root severing. Pruning in excess of 10 percent of the tree is in itself an adverse impact that increases the tree's susceptibility to disease and decreases vigor. Once thought to be essential, it is no longer recommended to prune the canopy in an amount commensurate with root loss. Canopy pruning would constitute an additional impact rather than mitigating the impact from root loss.

Further, this mitigation measure does nothing to address the significant impacts of irrigation, soil compaction, and filling and paving in and around the oaks. These impacts remain significant and unmitigated. IB-43

It does not follow that landscaping without using invasive exotics mitigates for the spread of pre-existing invasive species caused by habitat disturbance. This impact should be mitigated proactively by adopting an adequately funded adaptive management program to remove exotic species invasions on an ongoing basis. The Findings of Conformance state that native landscaping is to be used onsite. This should also be incorporated as a mitigation measure for significant impacts from the threat of increased invasion of exotic species.

Page 2.2-17. Consistency with Applicable Habitat or Natural Community Plans. Impact 2.2.1 refers to non-compliance of the proposed project to design criteria in the BMO. The project Alternatives I and II also do not comply with the criteria of the BMO and MSCP Subarea plan for the following reasons: IB-44

The Findings state that the project design has minimized impacts to habitat given the amount of land to be protected and the avoidance of the more sensitive vegetation types (BMO Criteria 1); and that development has been focused on the habitat types with the lowest sensitivity (Preserve Design Criteria 5). A detailed habitat area based analysis indicates otherwise. IB-44a

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment IB-42:
The County disagrees with this comment. The Final EIR analyzes indirect impacts from potential edge effects in Section 2.2.3.4. Many of the activities listed in the comment are illegal and would not be permitted on the site. Consequently, they cannot reasonably be expected to occur. Areas where camp activities would occur (except for hiking) have been considered to be impacted, and mitigation measures have been identified.

Response to Comment IB-43:
Section 2.2.3.4 has been revised in the Final EIR to remove all discussion of pruning as it is not proposed as part of the project. Irrigation, soil compaction, filling and paving around oaks were identified as significant impacts to oaks which will be mitigated. In addition, the RDEIR acknowledges potential edge effects as a result of the project but determines that with implementation of the conditions outlined in the Final EIR, section 1.1.1.2A, potential impacts would not be significant. The open space area would be monitored and managed according to the provisions of a Habitat Management Plan (HMP). The HMP would allow for adaptive management measures to be implemented, which could include the removal of invasive and exotic species.

Response to Comment IB-44:
The County disagrees with the comment, please see responses to comments IB-44a-k below.

Response to Comment IB-44a:
Please see RDEIR response to comment IB-15.

The Findings report: "The project will impact a total of 73.74 acres of habitat." What is not stated is that 28.57 acres or 39% of the lands impacted include the most sensitive habitat types (Tier-1 and Tier-II). Only 15% of the lands to be conserved, i.e., left undeveloped, contain the most sensitive habitat types (Tier-I and Tier-II). The development is clearly concentrated in the highest quality, most sensitive habitat areas. One-third (34%) of all coast live oak woodland habitat (Tier I) mapped on the property would be impacted by the project; nearly three-quarters (74%) of all Diegan coastal sage scrub (Tier II) would be impacted by the project. Impacts to wetland (Tier 1) habitats that could be avoided (i.e. those resulting from foot traffic and brush clearing) are proposed. The County required mapping and protection of wetland buffers should be closer to 200 feet rather than 25 feet for this high quality riparian wetland/wildlife corridor. A long span of impact into this wetland would be in conflict with the Preserve Design Criteria. IB-44b IB-44c IB-44d

The project fails to comply with the impact-avoidance design criteria in the BMO, Article V, Section A1. IB-44e

Regarding Preserve Design Criteria 2 and Subarea Plan Finding 2. The most structurally diverse habitat area onsite is an interconnected mosaic of oak woodlands, wetlands, coastal sage scrub, grasslands, chaparral, and oak riparian forest within the eastern one-third of the project site (see Figure 4-5). This mosaic of the highest quality habitats coincides closely with the development footprint of Alternative I as evidenced by the Figure 4-5 in the EIR. Almost the entire structurally diverse habitat area will be developed and/or fragmented (excluding the northeastern corner). The remaining habitats to be left undeveloped are predominantly large blocks of southern mixed chaparral (76%) and other types of chaparral (8% sage scrub/chaparral and 1% mafic southern mixed chaparral). Disturbed and developed lands comprise 3% and more diverse habitats comprise about 12% (northeast corner of property) of the land not currently proposed for development under Alternative I. IB-44f

Regarding Preserve Design Criteria 3 and Subarea Plan Finding 3, the project does not adequately conserve spatially representative examples of extensive patches of coastal sage scrub and coast live oak woodland. The extensive patches of classic Diegan coastal sage scrub onsite will be impacted (74% loss). Nearly all of the extensive patches of coast live oak woodland, which occupy the broad valley floor, will be impacted and/or fragmented. One-third of the coast live oak woodland acreage mapped on the site, would be removed by the project. This impact does not include all of the indirect impacts to oak trees through soil compaction within the critical root zone. The only patches of coast live oak woodland that would not be directly impacted are small isolated fragments of the existing contiguous canopy, which would likely be degraded or lost through indirect impacts (see Figure 4-5 in the EIR). IB-44g IB-44h IB-44i

Subarea Plan Findings 7 requires special emphasis on conserving adequate foraging habitat near golden eagle nest sites. The project lies less than a mile away from a known golden eagle nesting site. The project site currently provides a significant foraging area when the onsite habitat is combined with the contiguous meadows of Boulder Oaks IB-44j

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Response to Comment IB-44b:
Please see RDEIR response to comment IB-15.

Response to Comment IB-44c:
Please see RDEIR response to comment IB-10.

Response to Comment IB-44d:
Please see RDEIR response to comment IB-16.

Response to Comment IB-44e:
It is difficult to accurately respond to the comment as the Article and Section references don't match the current BMO. However, the project complies with the BMO Project Design Criteria by clustering development adjacent to existing use areas to minimize impacts to habitat, reducing road width to avoid sensitive biological resources, and by preserving 68 percent of the site in open space (County Code Section 86.505). The MSCP Findings for Reduced Project Alternative I were circulated with the Revised EIR and are included with the staff report for the project. Please also see RDEIR response to comment I-19.

Response to Comment IB-44f:
Please see RDEIR response to comment IB-17.

Response to Comment IB-44g:
Please see RDEIR response to comment IB-18.

Response to Comment IB-44h:
Please see RDEIR responses to comments IB-19 and IB-20.

Response to Comment IB-44I:
Please see RDEIR response to comment IB-21.

Response to Comment IB-44J:
Please see RDEIR responses to comment IB-22 and IB-23.

Ranch, Wildwood Ranch, and Golden Eagle West Ranch. This is the closest foraging habitat available to the nest site and has been recognized as an important foraging area by monitoring of this pair. More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. This habitat would therefore become severely degraded and of limited value for eagle foraging. IB-44j (cont'd.)

Given the above stated facts and the serious flaws in the analysis for the MSCP Findings of Conformance, the project cannot be considered viable. The proposed project and Alternatives I and II fail to meet the standards necessary to conform with the BMO Project Design Criteria and Preserve Design Criteria and to conform with the objectives of the County MSCP Subarea Plan.

The BMO applies to all land in the County within the boundaries of the MSCP, and the BMO applies to discretionary projects subject to CEQA, such as the proposed project. "No project requiring a discretionary permit shall be approved unless a finding is made that the project is consistent with the MSCP Plan, The County Subarea Plan, and the provisions of this Ordinance." (BMO, Article II.) No such findings can be made, therefore, this project cannot be approved. IB-44k

Page 2.2-18. Wildlife Corridors
The following discussion is relevant to the Design Criteria for Linkages and Corridors, numbers 1 to 10. Within the EIR, a serious error is made by concluding that the Salvation Army property does not contain a habitat linkage. The justification for this assumption was that the property was not identified as a biological core and linkage area in the Subarea Plan. However, the Findings of Conformance require that habitat linkages, as defined by the BMO, rather than just corridors, be maintained. Linkage is defined in the BMO as "an area of land which supports or contributes to the long-term movement of wildlife and genetic material." IB-45a

No wildlife movement studies were done. As detailed in comments above for page 2.2-9 Wildlife Corridors, the Salvation Army property is clearly and undeniably a habitat linkage and provides an important connection between existing large blocks of open space. The onsite habitat linkage is important for regional movement of wildlife as described earlier, and genetic exchange for plant and animal species, particularly those species reliant on the lower-lying oak woodland, wetland, coastal sage scrub, and grassland habitats.

The proposed project and alternatives would impact the majority of habitat within this onsite linkage. The east-west travel route along the tributary creek will be impinged on by improvements to the main road into the facility plus a dramatic increase in number of daily trips on this road. The north-south travel route will be impinged by development wrapping around the lower slopes of the central hill and extending through the broad, wooded valley to the south. The proposed project and Alternatives I and II do not conform with the BMO Design Criteria for Linkages and Corridors, numbers 1 to 10. Therefore, the BMO findings necessary to approve the project cannot be made. IB-45b

COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE REGARDING WILDLAND FIRE AND FIRE PROTECTION PLAN, BIOLOGICAL RESOURCES COMMENTS FOR THE SALVATION ARMY RDEIR AND MSCP CONFORMANCE FINDINGS, SIGNED BY BONNIE J. HENDRICKS, DATED JUNE 9, 2008 (CONTINUED)

Response to Comment IB-44k:
This general comment has been addressed through the responses to comments IB-44a through IB-44j.

Response to Comment IB-45a:
Please see RDEIR responses to comments I-18, I-19, and IB-3.

Response to Comment IB-45b:
Please see RDEIR responses to comments I-18, I-19, and IB-3.

Bonnie Hendricks, M.S. Biology

The author of these comments is a professional biologist of 20 years in San Diego County. Her expertise includes vegetation ecology, rare plant surveys, wetland delineation, and wildlife biology. She has extensive experience with CEQA and MSCP issues, including conformance findings. Her comments on the biology are based on review of the existing technical documents and an independent analysis using current aerial photographs, USGS topographic maps, and regional vegetation mapping. She has an intimate familiarity with the project area due to wildlife tracking and hiking in the region. She has accumulated years of observations on the following key properties (as well as other smaller parcels): Salvation Army (formerly First Presbyterian Church), MSCP Open Space Preserve (formerly Boulder Oaks Ranch and Boys and Girls Club property), Iron Mountain Open Space, Dos Picos Park, San Vicente Reservoir (City of San Diego), Sycamore Canyon Preserve, Mount Woodson Open Space, Wildwood Ranch, Meador Ranch, former Bud Heller Ranch, holdings of Morgal, Conklin, Klopp and Levin, BLM Open Space, Monte Vista Ranch, Barona Indian Reservation, Silverwood Wildlife Sanctuary, Oak Oasis Park, and Steltzer Park.

SAN DIEGO TRACKING TEAM

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Animal Activity Assessment in Connection with Proposed Land Development on the Salvation Army Property off Mussey Grade Road

Barry Martin
October 26, 2006

Background: San Diego Tracking Team has been requested by the Mussey Grade Road Alliance to conduct wildlife track and sign surveys on land surrounding the Salvation Army property (Figure 1). The purpose of these surveys was to discern primarily what mammal species are present in the area and to identify naturally occurring wildlife movement corridors gauging their overall health and utility via track and sign evidence.

Methodology: The transect surveys were conducted by seasoned San Diego Tracking Team (SDTT) members that have undergone International testing for wildlife track and sign interpretation and received Track and Sign II or III certification conducted in San Diego by Mark Elbroch (2006). Surveys for this study were conducted on five dates in December 2005, and January, May, and June 2006.

Access was granted for locations bordering the Salvation Army property in various key areas. Six survey transects were set up with specified start-end points and transect segments of varying length defined by Global Positioning System (GPS) checkpoints (Figure 1). A transect description was prepared for each transect (Appendix 1). Transects varied in length from 418 to 3,010 meters long and included an average width of 9 meters. A reconnaissance was performed in December 2005 and transects were subsequently surveyed on a one-time basis (i.e., Transects 1-3 in January 2006, Transects 4 and 5 in May

2006, and Transect 6 in June 2006). The SDTT wildlife survey form used for long-term wildlife monitoring was employed for this study. Data were collected for evidence (sign) of 11 mammal species considered focal to this study, including mountain lion (*Felis concolor)*, coyote (*Canis latrans)*, bobcat (*Lynx rufus)*, mule deer (*Odocoileus hemionus)*, raccoon (*Procyon lotor)*, gray fox (*Urocyon cinereoargenteus)*, American badger (*Taxidea taxus jeffersoni)*, long-tailed weasel (*Mustela frenata)*, ringtail (*Bassariscus astutus)*, western spotted skunk (*Spilogale gracilis)*, and San Diego black-tailed jackrabbit (*Lepus californica bennettii)*.

All observations of tracks or sign of the focal species were recorded on the data sheets according to the GPS defined transect segment and mapped onto an aerial photograph (1" = 600' scale) with topography (40-foot contour intervals). Data collected along each transect segment included the number of passes or observations per species (described below), the type of evidence observed (i.e., tracks, scat, scrapes, browse, bedding areas, fur, bones, prey cache, sighting, etc.), age of evidence (i.e., fresh or historic), tracking conditions (i.e., excellent, good, or poor), topography (flat, moderate or steep slope, ridgeline, etc), habitat type (i.e., grassland, oak riparian, etc.), and presence and type of prey (cottontails, skunks, ground squirrels, small rodents, etc.). General observations were noted regarding indicators of the overall health of areas we surveyed.

The surveys provided an indication of activity level and directions of travel for focal species in various geographic areas. We recorded the number of passes of animals (i.e., observations of sign) using identification of tracks and other sign. The term pass generally indicates the movement of one animal at one point in time through a specific area. An example would be a set of tracks from one individual traveling at a specific time in a specific direction. Whether tracks of 3 different coyotes or 3 passes of the same coyote were observed, in either case 3 passes would be recorded. These data cannot be used to estimate wildlife

population densities, however, they provide an indication of the relative activity levels of various focal species in an area.

Focal Mammal Species: Focal species were selected on the basis of providing a role as large carnivores (mountain lion, coyote, and bobcat), large prey (mule deer), meso-predators (gray fox, raccoon) or sensitive species and habitat specialists (American badger, long-tailed weasel, ringtail, spotted skunk, and black-tailed jackrabbit). American badger and black-tailed jackrabbit are California Species of Special Concern (CDFG 2006). Mountain lion, mule deer, and American badger are species covered by the MSCP. Ringtail and western spotted skunk have relatively few recorded occurrences within San Diego County (San Diego Natural History Museum 2006); ringtail is a fully protected furbearer in California and is considered sensitive by the Bureau of Land Management (BLM).

Additional mammal species of concern that were not investigated during this study include a number of sensitive rodent and bat species. Stephens' kangaroo rat (*Dipodomys stephensi)*, a state and federally listed species, may have a potential to occur onsite. Surveys from January 2001 were negative for this species, though suitable habitat was present (ENVIRA 2001). The current status of this species onsite is unknown. The Ramona grasslands population occurs less than approximately 5 kilometers to the north. Suitable habitat is present on the Salvation Army property within areas supporting sparse annual grasslands and coastal sage scrub with deep well-drained loamy soils and gentle slopes. Additional sensitive rodent species listed by CDFG as California Species of Special Concern that may have a potential to occur onsite include Dulzura California pocket mouse (*Chaetodipus californicus femoralis)* and Pacific southern grasshopper mouse (*Onychomys torridus Ramona)*. Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax)* and San Diego desert woodrat (*Neotoma lepida intermedia)*, also California Species of Special Concern, were

both observed during previous biological surveys of the site (Merkel and Associates 2005).

Several sensitive bat species listed as California Species of Special Concern may also occur onsite. These bats require caves, rock crevices, or abandoned buildings free from human disturbance for roost sites as well as suitable foraging habitat. The following bats are Species of Special Concern that may occur onsite in areas with rock caves and crevices or trees with exfoliating bark and hollowed branches: pallid bat (*Antrozous pallidus),* California leaf-nosed bat (*Macrotus californicus),* Townsend's big-eared bat (*Plecotus townsendii),* big free-tailed bat (*Nyctinomops macrotis),* Western mastiff bat (*Eumops perotis),* and spotted bat (*Euderma maculatum).*

Study Area: The dominant landform in the eastern part of the study area is the "West Branch" of San Vicente Creek, which flows through a wooded valley and is paralleled by Mussey Grade Road. The West Branch is a USGS blue-line stream that supports oak riparian forest and provides a perennial source of water in most years. The dominant landform in the western portion of the study area is collectively the east slopes of Iron Mountain. Through the middle of the study area lays a series of north-south trending broad plateaus and valleys, saddles, and connecting canyons.

The areas surveyed on foot within the larger study area include lands immediately adjacent to the Salvation Army property to the north and east and up to about 2 km to the south and southeast of Salvation Army property. The six survey transects were located in the following areas: 1) Golden Eagle Ranch West, 2) Mussey Grade Road (MGR) – Salvation Army turnoff, 3) MGR – Ellis Trust and Hanus Trust, 4) MGR – Foster Canyon Truck Trail, 5) Betty Meador Trust, and 6) Boulder Oaks Ranch (County Parks and Recreation).

Background and Definitions: The Salvation Army property lies within the Metro-Lakeside-Jamul Segment of the San Diego County Subarea Plan of the Multiple Species Conservation Program (MSCP). The County implements the MSCP through the San Diego County Subarea Plan and the Biological Mitigation Ordinance (BMO). Based on criteria defined in the BMO, the project site lies within a Biological Resource Core Area (BRCA). BRCA's are high quality habitats that support a variety of sensitive species and provide connecting linkages to other habitats within and outside the MSCP preserve area (County of San Diego 1997). The BMO requires that impacts to BRCA be avoided to the maximum extent practicable (County of San Diego 2004). BRCA's are among the highest priority areas for assembling MSCP preserve lands.

Although no hard-line preserve boundaries are delineated in this segment of the Subarea Plan, the definitions and consistency requirements that guide the assembly of the preserve are intended to maximize and maintain connections between core habitat areas (County of San Diego 1997, Conservation Biology Institute 2002, 2003). These linkages allow for demographic and genetic exchange by all species between inland and more coastal areas and between different watersheds. They are also intended to allow larger predators (mountain lions, coyotes, and bobcats) to move among conserved core habitat blocks and reach more coastal habitats (Conservation Biology Institute 2002). These top predators are particularly vulnerable to extirpation from fragmented habitats (Soule et al. 1992, Noss 1983), which can precipitate further changes to ecological communities (Conservation Biology Institute 2002).

"Habitat linkage" is defined for purposes of MSCP monitoring as habitat areas that provide connectivity between habitat patches as well as year-round foraging, reproduction, and dispersal habitat for resident plants and animals (County of San Diego 1995, Conservation Biology Institute 2002, 2003). The BMO defines "linkage" more generally as an area of land, which supports or contributes to the long-term movement of wildlife and genetic material (County of San Diego 2004).

The BMO defines "corridor" as a specific route that is used for movement and migration of a species. Within this context the Salvation Army property consists of BRCA, habitat linkages, and wildlife corridors. As such, the project must comply with the MSCP and BMO design standards and criteria for corridors and linkages (County of San Diego 1997, 2004).

Regional Context: Several open space preserves exist in the study area vicinity, including the Iron Mountain Preserve Area to the west, Dos Picos County Park and Mount Woodson Open Space to the north, a large MSCP Preserve (County-owned Boulder Oaks Ranch and State-owned San Vicinte property) to the south, and a large MSCP preserve (State-owned Monte Vista Ranch) further to the east (Figure 2). The Salvation Army property is part of a regional habitat linkage between San Vicente Reservoir to the south; Iron Mountain, Sycamore Canyon, Beeler Canyon, and Los Penasquitos Canyon to the west; Mount Woodson, Sycamore Creek, San Pasqual Valley, and Guejito Ranch to the north; and Monte Vista Ranch, Oak Oasis Park, Silverwood Wildlife Sanctuary, El Capitan Reservoir, and Cleveland National Forest to the east. The high concentration of biological preserves, the presence of BCRA, and previous biological survey results suggest that the study area supports a high concentration of sensitive biological resources that, if lost or fragmented, could not be replaced or mitigated elsewhere (County of San Diego 1996, CDFG 1999).

The County and CDFG (1999) identified this study area, including the Salvation Army and adjacent properties, as a biological hot spot in San Diego County and have subsequently acquired several of these parcels for biological open space. Sensitive animal species observed during the present study or previous surveys compiled by CDFG (1999) within the study area are included in Table 1. A total of 43 sensitive wildlife species were observed in the study area (CDFG 1999 and present study), whereas biological studies for the Salvation Army Project only detected 10 sensitive or locally important species (Merkel and Associates 2005, Appendices 2 and 5). The low detection rate on Salvation Army is likely due to

limited survey effort rather than absence of these species given that nearly the full range of habitat types found within the larger study area is present on the Salvation Army property. Two of the 10 species, northwestern San Diego pocket mouse and San Diego desert woodrat, were not detected in previous surveys compiled by CDFG (1999) or the present study but were observed during small mammal trapping for Salvation Army (ENVIRA 2001).

Table 1. Sensitive or Locally Important Animal Species Observed Within the Study Area (Salvation Army Property and 2 km-Buffer)[1]

Species	Status[2]
Invertebrates	
San Diego fairy shrimp (*Branchinecta sandiegonensis*)[3]	FE
Quino checkerspot butterfly (*Euphydryas editha quino*)[4]	FE
Amphibians and Reptiles	
Western spadefoot toad (*Scaphiopus hammondii*)	CSC, Protected
Arboreal salamander (*Aneides lugubris*)	No special status
San Diego banded gecko (*Coleonyx variegates abbottii*)	SA
Silvery legless lizard (*Anniella pulchra pulchra*)	CSC
San Diego coast horned lizard (*Phrynosoma coronatum blainvilleii*)	CSC, Protected
Coastal western whiptail (*Cnemidophorus tigris multiscutatus*)	SA
Orange-throated whiptail (*Cnemidophorus hyperythrus beldingi*)	CSC, Protected
Granite night lizard (*Xantusia henshawi henshawi*)	No special status
San Diego ringneck snake (*Diadophis punctatus similis*)	SA
Coastal rosy boa (*Lichanura trivirgata roseofusca*)	SA
Coast patch-nosed snake (*Salvadora hexalepis virgultea*)	CSC
Two-striped garter snake (*Thamnophis hammondii*)	CSC
Northern red-diamond rattlesnake (*Crotalus ruber ruber*)	CSC
Birds	
Golden eagle (*Aquila chrysaetos*)	CSC, Fully Protected
White-tailed kite (*Elanus caeruleus*)	SA, Fully Protected
Osprey (*Pandion haliaetus*)	CSC
Northern harrier (*Circus cyaneus*)	CSC
Cooper's hawk (*Accipiter striatus*)	CSC
Sharp-shinned hawk (*Accipiter striatus*)	CSC
Western screech owl (*Otus kennicottii*)	CSC, Fully protected

Long-eared owl (*Asiootus wilsonianus*)	CSC
Turkey vulture (*Cathartes aura*)	No special status
California gnatcatcher (*Polioptila californica californica*)	FT, CSC
Bell's sage sparrow (*Amphispiza belli belli*)	CSC
So. Cal. rufous-crowned sparrow (*Aimophila ruficeps canescens*)	CSC
Grasshopper sparrow (*Ammodramus savannarum*)	SA
Yellow warbler (*Dendroica petechia*)	CSC
Yellow-breasted chat (*Icteria virens*)	CSC
Tricolored blackbird (*Agelaius tricolor*)	CSC
Black-crowned night heron (*Nycticorax nycticorax*)	SA
Great-blue heron (*Ardea herodias*)	SA
California horned lark (*Eremophila alpestris*)	CSC
Western bluebird (*Sialia mexicana*)	MSCP
Mammals	
Mountain lion (*Felis concolor*)	Protected, MSCP
Mule deer (*Odocoileus hemionus*)	MSCP
Bobcat (*Lynx rufus*)	No special status
Ringtail (*Bassariscus astutus*)	Protected
Western spotted skunk (*Spilogale gracilis*)	No special status
Long-tailed weasel (*Mustela frenata*)	No special status
San Diego black-tailed jackrabbit (*Lepus californica bennettii*)	CSC
Merriam's chipmunk (*Eutamias merriami*)	No special status

[1] Data are derived from previous surveys within the study area compiled by CDFG (1999) and from the present study. The study area includes the Salvation Army Property and surrounding areas within 2 kilometers. Observations from outside this study area (e.g., Monte Vista Ranch) are excluded from the table with two exceptions (see footnotes 3 and 4).

[2] Status: FE – Federally Endangered; FT- Federally Threatened; CSC – CDFG Species of Special Concern; Fully Protected - species that may not be taken or possessed without a permit from CDFG; SA - California Special Animals includes all taxa the CNDDB is interested in tracking regardless of status or legal protection; MSCP – species covered by the MSCP; No special status – a few select species without special status were included because of their local biological interest or importance.

[3] Observed 3 kilometers south of Salvation Army property.

[4] Observed 2.3 kilometers south of Salvation Army property.

Suitable habitat within the historical range of the federally endangered Quino checkerspot butterfly *(Euphydryas editha quino)* is present in the openings of chaparral, coastal sage scrub, or grasslands. The Quino checkerspot was

observed in the Foster Canyon area (San Vicente preserve) approximately 3 kilometers south of the Salvation Army property (Fred Sproul, consulting biologist, personal communication).

The federally threatened San Diego fairy shrimp (*Branchinecta sandiegonensis)* was detected 2.3 kilometers south of Salvation Army property in a granite basin on a rock outcrop with seasonally ponded water (CDFG 1999 and Fred Sproul, personal communication). The federally and state endangered least Bell's vireo (*Vireo bellii pusillus)* has not been observed in the immediate study area, however, focused surveys for this species have not been conducted. Suitable habitat for least Bell's vireo occurs in the larger drainages containing dense willow stands within riparian forest habitats on the Salvation Army property.

American badger also has a potential to occur onsite as suitable grassland and open scrub habitats occur. American badger was detected in the Wildcat Canyon area (EDAW 2006) and Ramona grasslands (Ecological Ventures 2005)

Results: The survey results for focal mammal species are described below for each transect and are summarized in Figure 1. In addition to the focal mammal species, other mammal species detected included many of the common rodent species, striped skunk, and desert cottontail. Although not the primary focus, amphibians and reptiles observed during this survey included pacific tree frog, western toad, bullfrog, side-blotched lizard, western fence lizard, granite spiny lizard, western whiptail, coast horned lizard, and two-striped garter snake.

A diversity of bird species was observed and noted during the tracking surveys including American kestrel, golden eagle, white-tailed kite, Cooper's hawk, red-tailed hawk, red-shouldered hawk, merlin, turkey vulture, blue-gray gnatcatcher, western bluebird, American coot, red-winged blackbird, oak titmouse, acorn woodpecker, northern flicker, Nuttall's woodpecker, common raven, American crow, Bewick's wren, house wren, ash-throated flycatcher, black phoebe,

common phainopepla, mourning dove, bushtit, hooded oriole, common yellowthroat, spotted towhee, California towhee, lesser goldfinch, yellow-rumped warbler, California quail, western meadowlark, and Anna's hummingbird.

Results of the track and sign surveys are summarized in Table 2 and are described below for each transect.

Table 2. Summary of track and sign survey results.

Transect	Species Present[1]	Number of Passes (Observations)	Transect Length (m)
1. Golden Eagle Ranch West	MD, BC, CO, GF, RA, JR	130	451
2. MGR-Salvation Army Turnoff	MD, BC, CO, GF, RA, SP, LT	20	478
3. Ellis Trust & Hanus Trust	MD, BC, CO, GF, LT, JR	41	418
4. MGR-Foster Truck Trail	BC, CO, GF	26	512
5. Betty Meador Trust	ML[2], MD, BC, CO, GF, JR	36	707
6. Boulder Oaks Ranch	ML[3], MD, BC, CO, GF, RA	90	3010

[1] ML - Mountain Lion, MD - Mule Deer, BC – Bobcat, CO – Coyote, GF – Gray Fox, LT – Long-tailed Weasel, JR – Black-tailed Jackrabbit, RA – Racoon, SP – Spotted Skunk
[2] 1991 observation
[3] 1991 observation

Transect 1: Our first transect was on the Golden Eagle Ranch West on the north boundary of the Salvation Army property. This track and sign transect was set up and conducted in the vicinity of the pond located at N32.98981 W116.93474 (all latitude-longitude coordinates are in World Geodetic System of 1984). This sample area lies within an active wildlife corridor that includes diverse habitat and seasonal water. The pond itself lies in a valley surrounded by undeveloped hilly

terrain. This area connects via native habitats and gentle terrain to a larger pond at Dos Picos County Park to the north, and a tributary canyon to the south on Salvation Army property. The predominant habitat transitions between mixed chaparral, coastal sage scrub, grassland, and disturbed habitat (ranchland).

We found an abundance of mule deer tracks on a definite north/south travel orientation using trails on either side of the canyon that extends south from the pond crossing onto the Salvation Army property. Also found was an abundance of coyote tracks and scat, along with significant evidence of prey species including rabbits, small rodents, skunks and squirrels throughout the area. Evidence of bobcat, gray fox, raccoon, and San Diego black-tailed jackrabbit was also found.

We found this to be a healthy, active and very diverse movement corridor with a particularly high activity level for mule deer and other focal species. Six of the ten focal species were detected with a total of 130 passes (observations) recorded for the 451-meter long transect. Tracking conditions were good with moist mud left along the pond edges and well-used deer trails along the canyon sides.

Transect 2: Our second survey transect sampled the creek bed and roadside adjacent to the Salvation Army turnoff at 14488 Mussey Grade Road (along West Branch of San Vicente Creek). This survey transect starts at N32.98898 W116.92673, sampling the culvert and both sides of the road as it winds through an oak riparian habitat on the eastern boundary of the Salvation Army property.

We found evidence of gray fox, coyote, mule deer, bobcat, long-tailed weasel, spotted skunk and raccoon throughout this area with cottontails, small rodents and ground squirrels also quite apparent by their sign. The long-tailed weasel and spotted skunk tracks were found in the culvert under the road. Many birds indicative of a healthy ecosystem were noted in this area as well.

Several trails transit across the road east and west through this area with evidence of mule deer, coyote, gray fox, raccoon and squirrels crossing (some not successfully; road kill). This area supports a diversity of species with seven out of ten focal species observed and a total of 20 passes (observations) recorded for the 478-meter long transect. Tracking conditions were good within the culvert but poor for the area along the road shoulder.

Ringtail was not detected during the survey, but was observed in 1994 successfully crossing Mussey Grade Road just north of the Salvation Army turnoff (Bonnie Hendricks, consulting biologist, personal communication). Ringtail is likely to still be present in the area, as key habitat components exist including wooded areas with rocky outcrops, boulder piles, and seasonal water (Murie and Elbroch 2005, Elbroch 2003, Whitaker 1980). This species has become increasingly rare in San Diego County, but is still known from Mt. Woodson and the Wildcat Canyon area (San Diego Natural History Museum 2006, EDAW 2006).

Transect 3: The third survey was conducted further south along the eastern border of the Salvation Army property on the Ellis and Hanus holdings. Here the land follows an east/west draw that offers oak riparian habitat with good cover, forage, and plenty of prey species for carnivorous animals. The riparian draw gives way to open chaparral and then grassland that was burned in the 2003 Cedar Fire.

We found evidence of a flow of wildlife through this area following linear landscape and habitat features in an east/west and a north/south direction by coyotes, bobcat, and mule deer. We also found evidence of gray fox, long-tailed weasel, and black-tailed jackrabbit as well as an old mule deer carcass, possibly a victim of the 2003 Cedar fire. There is a well-used north/south deer run along the Salvation Army property line within the open habitats of this broad

valley/plateau. Six out of ten focal species were detected and a total of 41 passes were recorded along the 418-meter long transect. Tracking conditions ranged from poor to good along the transect length.

Transect 4: The fourth survey transect included a segment of Mussey Grade Road near Foster Truck Trail. We found evidence of coyote, bobcat, and gray fox on the west side of the road at the junction with the southern access road to Salvation Army and Wildwood Ranch. Three of the ten focal mammal species were detected and a total of 26 passes were recorded along the 512-meter long transect. Tracking conditions were poor on the shoulder of Mussey Grade Road and fair along the dirt road.

Transect 5: Next we surveyed the Betty Meador Trust property examining obvious corridor routes in both a north/south orientation along a plateau south of the Wildwood Ranch pond, and an east/west route following a creek. We found evidence of mule deer, bobcat, coyote, gray fox, and black-tailed jackrabbit throughout the area. Five of the ten focal species were observed along this transect and a total of 36 passes were recorded along the 707-meter transect. Although mountain lion sign was not observed during the one time transect survey in this area, evidence of a mountain lion prey cache was observed previously near this transect. Cougar predation of goats occurred in March of 1991 (Fred Sproul, personal communication; Figure 1).

Transect 6: The sixth survey transect included a loop on the Boulder Oaks Ranch, including the oak woodlands and meadows, the pond, and the dirt road leading north into the valley on Wildwood Ranch. Evidence of mule deer, bobcat, coyote, gray fox, raccoon, and San Diego black-tailed jackrabbit were observed. A young mule deer buck was sighted along with several deer bedding areas in the oak woodland-meadow area. Desert cottontails, California ground squirrel, and Botta's pocket gopher were very abundant. A total of six focal species were detected and 90 passes were recorded along the 3010-meter transect.

Although mountain lion sign was not observed during the one time transect survey in this area, tracks of mountain lion have been reported on the transect at the Boulder Oaks pond (spring of 1994) and in the canyon just south of the Salvation Army property (spring of 1998) (Fred Sproul, personal communication, Figure 1).

Discussion: Within the study area, the heavily wooded "West Branch" of San Vicente Creek provides cover and a natural topographic feature for wildlife movement in a north-south direction. Mussey Grade Road (MGR) runs parallel to the creek along with occasional low-density residences. There are still several stretches of the creek with no development other than the two-lane road itself. These stretches in conjunction with tributary canyons and associated ridgelines appear to provide opportunities for east-west wildlife movement. Two areas that were examined where evidence of east-west wildlife movement was found include:

- Confluence of the tributary canyon (coming from Salvation Army property) with the "West Branch" on west side of MGR; associated culvert under-crossing of MGR; and two adjacent tributary canyons (with dirt road between them) on east side of MGR (Transect 2 on Figure 1)
- Tributary canyon from Salvation Army to the "West Branch" on the Hanus, Ellis, and Bale Trust properties (Transect 3 on Figure 1)

Also within the study area is an overall north-south trending natural corridor (and habitat linkage) at the base of the Iron Mountain range comprised of several broad valleys or plateaus, and saddles between hills that connect the valleys. This area is particularly rich in wildlife and serves as both a movement corridor and valuable foraging and breeding habitat. Evidence of use of this habitat linkage by the focal wildlife species was found in our survey areas on the boundaries of the Salvation Army property. These areas include:

- Golden Eagle Ranch West pond and tributary leading south into Salvation Army on its northern boundary (Transect 1 on Figure 1)
- Hanus Trust along western boundary of Salvation Army (Transect 3 on Figure 1)
- Betty Meador Trust along southern boundary of McGuire Ranch (Transect 5 on Figure 1)
- Boulder Oaks Ranch (County Parks and Recreation) along southern boundary with Wildwood Ranch (Transect 6 on Figure 1)

Within this regional north-south habitat linkage, the valleys contain a diverse mosaic of habitats including oak woodland, grassland, coastal sage scrub, chaparral, and open water ponds. The saddle areas are generally mixed chaparral and also provide a natural movement route for wildlife. These habitat areas along the north-south habitat linkage provide important functions for wildlife such as cover, browse, and water for mule deer; stalking of prey and hiding of kill sites for mountain lion; and a safe movement route to more distance resources for both species.

This overall north-south habitat linkage can be defined as the valleys, canyons, and intervening saddles from 1) the pond at Dos Picos County Park; 2) southward to the pond at Golden Eagle Ranch West; 3) through Salvation Army via two generally north-south tributary canyons, two saddles between the tributaries and the broad plateau/valley, and the edges of the broad valley leading south to 4) the Wildwood Ranch pond (western route) and the McGuire Ranch pond (eastern route); and 4) further south across a broad plateau containing the Boulder Oaks Ranch pond and meadows (Figures 1 and 2).

Review of maps depicting the proposed project development overlaid onto the vegetation map indicates that the most structurally diverse habitats (particularly ecotonal habitats with woodland) would be disproportionately impacted by the development (BRG 2005). The habitat areas that appear to be most conducive

to north-south wildlife movement would be impacted. These areas include the ecotonal habitats along the valley/plateau in the southern two-thirds of the property and the two saddles connecting the plateau to the generally north-south trending tributary canyons (north and south of the larger east-west tributary to the West Branch). The saddle areas are comprised of mostly chaparral with topography conducive to wildlife movement between an oak riparian canyon and the long valley/plateau in a north-south direction. Wildlife will preferentially use saddles or passes between the steeper hills as travel routes (McKenzie 1995, Barry Martin, personal observation). The long plateau/valley on the property contains a mosaic of coastal sage scrub, oak woodland, chaparral, grassland, and disturbed habitats. The highest wildlife use areas and north-south travel routes are likely to be focused along the edges of this valley/plateau where sufficient cover can be found and the transition zone between habitat types and different slopes favor wildlife use.

Ecotonal areas between habitat types are known to be especially valuable to wildlife (McKenzie 1995, Barry Martin, personal observation). For example, in the Chula Vista MSCP Subarea Plan (2003) development within habitat edge areas is discouraged. During the multiple year Southern California Puma Project, edge habitats, particularly chaparral-woodland and woodland-grass, were important to male cougars at night when they were most likely hunting and traveling, and female cougars during all time periods (Sweanor, et. al. 2004). Prey caches were found in all cover types, but most frequently in woodland or chaparral-woodland (Sweanor, et. al. 2004).

The east-west travel routes would also be impacted by the development from roadway fire clearance and an increase in traffic volume on the access road along the oak riparian tributary canyon. Roads and road improvements can cause a direct loss of habitat, alter the quality of adjacent habitat, impede animal movements, and lead to road mortality (Forman, et. al. 2003). Studies suggest that the two main groups of factors that influence road-kill are 1) traffic volume

and speed, and 2) proximity of habitat cover and wildlife movement corridors (Forman, et. al. 2003). Given that the road improvements will alter habitat and increase traffic volume along a road within an active riparian wildlife corridor, the effects on wildlife populations would be significant.

The second east-west travel route via the Ellis and Hanus Trust properties would no longer be functional as it would lead into the proposed developed areas of the Salvation Army (Transect 3 on Figure 1).

The remaining undeveloped portions of the Salvation Army will still support wildlife populations, however, the core of this habitat linkage will be significantly impacted and edge effects will contribute to degradation of the surrounding habitats. The majority of land not proposed for development by Salvation Army is chaparral (85%), with relatively little habitat diversity preserved (see Figure 4-5, BRG 2005). This may contribute to a decline in habitat usage by mountain lions and other species. The Salvation Army land lies within a BCRA and habitat linkage area and proposes impacts (direct or indirect) to most of the woodland-chaparral and woodland-grass habitats onsite (Figure 4-5, BRG 2005).

Particularly vulnerable to loss or fragmentation of woodland, coastal sage scrub, and grassland communities are the special status species detected in the surrounding areas including mountain lion, long-tailed weasel, spotted skunk, black-tailed jackrabbit, and (previously detected) ringtail. The Southern California Puma Project found that cougars typically avoided chaparral habitats during night and crepuscular periods when they were most likely hunting or traveling (Sweanor, et. al. 2004). Additionally, cougars were rarely in close proximity to buildings or campgrounds. Nearly 80% of the locations recorded for radio-collared female cougars were greater than 1000 meters from buildings or campgrounds during different times of the day (Sweanor, et. al. 2004).

The two closest radio-collared mountain lions to the study area were 1) north of Ramona in the Boden Canyon and Guejito Ranch area, and 2) areas east of El Capitan Reservoir extending into the Cuyamaca Mountains (Mike Puzzo, personal communication). Mountain lion activity was also identified via track and sign surveys on the Monte Vista Ranch approximately 6 kilometers southeast of the study area (EDAW 2006). Mountain lion was detected at only one location monitored among several corridors considered critical to regional wildlife movement in the MSCP preserve (I-5/I-805 merge at western end of Los Penasquitos Canyon) (Conservation Biology Institute 2002). The distribution of known mountain lion home ranges in San Diego County points to the importance of maintaining the integrity of the north-south and east-west habitat linkages within the study area for overall regional connectivity necessary to maintain gene flow and long-term population viability for the mountain lion.

The Salvation Army project proposes direct or indirect impacts to the majority of the woodland-chaparral and woodland-grass edge habitats onsite. An area of human influence extending 1000 meters from proposed buildings or campgrounds would stretch across most of the property. Given that results from the Southern California Puma Project indicated that nearly 80% of the locations recorded for radio-collared female cougars were greater than 1000 meters from buildings or campgrounds, build-out of the proposed project facilities would be expected to have a significant impact on the movement and behavior of mountain lion.

Development of this project as proposed would contribute to fragmentation of the open space system of existing preserves surrounding the Salvation Army property. This preserve system presently encompasses approximately 3,216 hectares (7,947acres) (i.e., 4,233 acres on Monte Vista Ranch, 1,214 acres on Boulder Oaks Ranch, 1,500 acres on San Vicente property, 40 acres on BLM, 880 acres on Iron Mountain Preserve, and 80 acres on Dos Picos Park). Protection of the onsite north-south and east-west regional habitat linkages from

fragmentation and edge effects within the larger open space system is crucial to the continued viability of wildlife populations in the region.

Conclusions: Results of the San Diego Tracking Team's surveys confirm that a healthy and diverse ecosystem in the study area supports robust mammal movement in predictable north-south and east-west orientations following topographical features. It was evident from the survey results of adjacent areas that the Salvation Army property is part of an important regional habitat linkage serving to connect several large areas of open space in all directions.

The Salvation Army land lies within a BCRA and habitat linkage area and proposes impacts (direct or indirect) to most of the woodland-chaparral and woodland-grass habitats onsite (Figure 4-5, BRG 2005).

The Salvation Army project, as currently proposed would pose a significant impact on the north-south and east-west regional habitat linkage by concentrating development in ecotonal woodland-chaparral and woodland-grass habitat areas known to be particularly valuable for wildlife (Sweanor 2004, McKenzie 1995). Wildlife will also preferentially use saddles or passes between the steeper hills as travel routes. Two of these areas (i.e., saddles providing logical north-south movement routes) are also proposed for development under the current Salvation Army project alternatives. The majority of land not proposed for development by Salvation Army is chaparral (85%), with relatively little habitat structural diversity preserved (see Figure 4-5, BRG 2005). This may also contribute to a decline in habitat usage by mountain lions and other species.

The results of this and previous biological surveys, the presence of BCRA, and the high concentration of biological preserves within the larger study area all indicate that the study area supports a high concentration of sensitive biological resources that, if lost or fragmented, could not be replaced or mitigated elsewhere (County of San Diego 1996, CDFG 1999). Protection of the onsite

north-south and east-west regional habitat linkage from fragmentation and edge effects within the larger open space system is crucial to the continued viability of wildlife populations in the region.

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Letter IB
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APPENDIX 1

MUSSEY GRADE ROAD TRANSECTS

Transect 1
Golden Eagle Ranch West
(1/11/06)

Description: Special one time transects adjacent to proposed development in Mussey Grade Road area.

Directions: Coordinate access.

Checkpoints:

1.) **Parking Area N32.98999 W116.93448** Check parking area, margins, and game trail leading toward canyon, up to property boundary with Salvation Army. **Habitat:** Disturbed.

2.) **Pond N32.98981 W116.93474** Check perimeter of the pond. **Habitat:** Temporary pond, disturbed, grassland to sage scrub/chaparral.

3.) **N32.98968 W116.93547** Southwest of the pond go to the prominent Laurel Sumac bush growing next to the edge of a meadow that lies west of the pond. From here arc south and then east along the dam working your way back to the parking area east of the pond, check all the approaches to the dam from the south. **Habitat:** Grassland/meadow to sage scrub/chaparral.

Transect 2
Mussey Grade Road – Salvation Army Turnoff
(1/11/06)

Directions: Park at Salvation Army turnoff at 14488 Mussey Grade Road. Caution! Traffic on this road is generally light however some drivers speed and it can be dangerous as you walk along the roadside.

Checkpoints:

1.) **N32.98898 W116.92673** Entrance to Salvation Army Resort is a wide area where you can pull off the road and park off to the side while checking the area for tracks. Check the driveway area then head for the adjacent culvert. **Habitat:** Oak Riparian. Culvert, check creek bed as it runs through the culvert under the road. **Habitat:** Tunnel/Underpass.

2.) **N32.98908 W116.92694** North from culvert on the west side of the road, check along the road edge. **Habitat:** Oak Riparian.

3.) **N32.99100 W116.92706** Turn around at the 45 mph sign, go back to the south on the east side of the road to where you parked. **Habitat:** Oak riparian.

Transect 3
Mussey Grade Road – Ellis Trust and Hanus Trust
(1/11/06)

Directions: Drive Mussey Grade Road south to Art Bale/Pearl Ellis residence driveway. Park on driveway where paved portion changes to dirt. Walk dirt road to top along Salvation Army property boundary, loop around on deer trail.

Checkpoints:

1.) **Ellis property dirt road N32.98198 W116.92425** Walk along dirt road upward to east. **Habitat:** Southern mixed chaparral, oak riparian in canyon below.

2.) **Hanus property gate/dirt road N32.98151 W116.92727** Segment 2 starts at gate/property line between Ellis and Hanus holdings. Proceed through gate up dirt road to top along Salvation Army property boundary, loop around on deer trail back to dirt pad where house burned down and end there. **Habitat:** Southern mixed chaparral, oak woodland, grassland.

Transect 4
Mussey Grade Road – Foster Truck Trail
(5/11/06)

Directions: Drive Mussey Grade Road south to Foster Truck Trail and park.

Checkpoints:

1.) **Along Mussey Grade Road start at first dirt road N of Foster Truck Trail N32.97405 W116.91907** **Habitat:** Oak riparian, coastal sage scrub.

2.) **Along Foster Truck Trail through private gate onto Betty Meador's property N32.97044 W116.91859** **Habitat:** Oak riparian, southern mixed chaparral.

Transect 5
Betty Meador Trust
(5/11/06)

Directions: Drive Mussey Grade Road south onto Foster Truck Trail, park along road near vineyard.

Checkpoints:

1.) **Dirt trail to east from vineyard N32.96896 W116.91784.** Follow dirt path and wander through open meadow and chaparral to property boundary with Wildwood Ranch. **Habitat:** Southern mixed chaparral, chamise chaparral, grassland

2.) **Boundary along edge of Wildwood Ranch.** Follow fence line and game trails to south and double back to north. North side of steep riparian canyon below Wildwood Pond **N32.96703 W116.92592. Habitat:** Mixed chaparral, grassland, oak woodland.

Transect 6
Boulder Oaks Ranch
(6/17/06)

Directions: Drive Mussey Grade Road south to Foster Truck Trail, start at northern boundary of Boulder Oaks Ranch on Foster Truck Trail.

Checkpoints:

1.) **Sleepy hollow to Boulder Oaks Meadow N32.96225 W116.92464**
Habitat: Oak woodland, wet meadow.

2.) **Boulder Oaks Meadow to the Pond Turnoff N32.96070 W116.92542**
Habitat: oak woodland, grassland, vernal pools, chaparral.

3.) **Pond Turnoff to Pond Dam N32.95882 W116.92691 Habitat:** oak woodland, mixed chaparral.

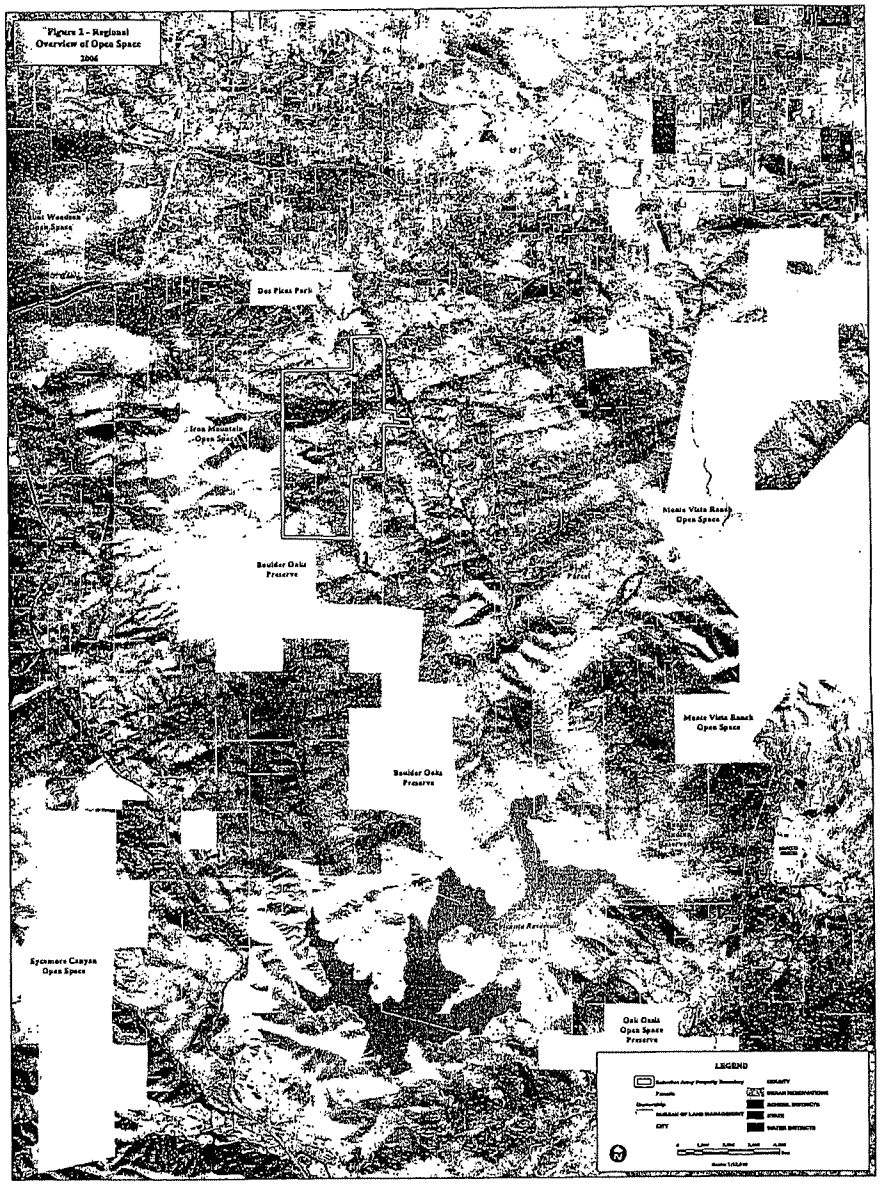
4.) **Perimeter of Pond N32.96164 W116.93195 Habitat:** Southern mixed chaparral, grassland, freshwater marsh.

5.) **Pond Dam to property boundary with Wildwood Ranch Habitat:** Southern mixed chaparral, grassland.

6.) **Boundary with Wildwood/Boulder Oaks Road through Stringer Meadows Habitat:** mixed chaparral, grassland, oak woodland.

End at start point (full loop).

Letter IB
Attachment
(cont'd.)



Comment
Letter J

*****RAMONA COMMUNITY PLANNING GROUP*****
15873 HWY 67, RAMONA, CALIFORNIA 92065
Phone: (760)789-0994

June 9, 2008

Kristin Blackson, Project Manager
Department of Planning and Land Use
5201 Ruffin Rd., Ste. B
San Diego, CA 92123

RE: Draft Recirculated EIR for P 70-379W2, SCH No. 2000031058
Salvation Army Divisional Camp and Retreat

The Ramona Community Planning Group (RCPG) reviewed the Draft Recirculated EIR at the meeting June 5, 2008.

To provide historical context, the RCPG last denied the project in October, 2001. The project is located midway up the slope of a long box canyon with no secondary access. The motion from October 4, 2001, was as follows: "As this project is less than 10 percent different from the project presented to us in 1999, which we unanimously denied, and is relevant to the findings we made and voted out in November, 2000, I therefore move to deny this application on the basis of its lack of harmony in scale, bulk, and density with the existing neighborhood, its harmful effect on the desirable community character, and the unsolved fire dangers it represents." The Motion passed 8-5-0-0-2, with 5 members voting no, and 2 members absent. J-1

After hearing a brief presentation from a Salvation Army representative and the public testimony of 6 speakers at the meeting June 5, 2008, a motion was made to support the Draft Recirculated EIR and send comments. It died for lack of a second. The following motion was made:

MOTION: TO SEND COMMENTS ON THE DRAFT RECIRCULATED EIR.
The Motion **passed 11-0-0-0-4,** with 4 members absent.

COMMENTS:

CURRENT CONDITIONS:

- South of Dos Picos Road burned in 2003, and it is already overgrown. Trees are touching. Fire trucks will not go down Mussey Grade Road in a wildland fire in these conditions. J-2
- This area is in the top seven percent for the highest hazard fire area in the State. J-3
- The Mussey Grade area experiences frequent wildfires and is difficult to evacuate. J-4

1

COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, SIGNED BY RADZIK, CHAIR DATED JUNE 9, 2008

Response to Comment J-1:
This comment provides a historical record of motions by the RCPG. No further response is required.

Response to Comment J-2:
Please see RDEIR response to comments D-2, D-3, H-23 and H-29.

Response to Comment J-3:
Please see RDEIR response to comment H-15. The comment does not explain where the "top seven percent" number comes from.

Response to Comment J-4:
Please see RDEIR responses to comments D-2 and D-3.

P70-379W2, Salvation Army Comments, Draft Recirculated EIR

TRAFFIC AND CIRCULATION:

- The sole access road for the project is 12 times longer than what the fire code allows. The road blocked anywhere will cause major problems during an evacuation for both camp visitors and Mussey Grade residents.
- As the Mussey Grade community is a rural, agricultural community, evacuations will be complicated by the additional traffic of livestock/horse trailers, motor homes, etc.
- Mussey Grade Road is a substandard road with no shoulders that experiences side friction from development in the area. The traffic study for the Recirculated Draft EIR does not include intersection modeling. Assumptions are made the road will be clear and evacuees will experience uninterrupted traffic flow to Hwy 67.
- There are 300 parking spaces at the camp. Three hundred cars is one mile of cars, which could cause delays of up to one hour for Mussey Grade residents during an evacuation.

J-5

POPULATION/SHELTER IN PLACE:

- As part of the Fire Protection Plan for the camp, sheltering in place in a building is the preferred plan. The wind speed used to model the fire was 24 mph. In the Witch fire, wind speeds exceeded 70 miles per hour for a 48-hour period. In the Cedar fire, wind speeds exceeded 40 miles per hour for a 24-hour period. Real wind scenarios should be used to study fire in the Draft Recirculated EIR.

J-6

- The population of the camp throughout the year is sketchy. The maximum number of people to be at the camp, and the frequency at which this number will occur, is unclear. For certain events, over 700 people can be at the camp. The composition of people, what transportation will be used during these events or when they will occur is not well-defined in the Draft Recirculated EIR. The Draft Recirculated EIR should address the actual expected population to better determine scenarios for sheltering in place and evacuation.

J-7

- Shelter in place does not deal with hysteria and human needs. Children can have a particularly difficult time.

J-8

COMMERCIAL ASPECTS OF THE PROJECT/COMMUNITY CHARACTER:

- Children will only be at the camp eight weeks in the summer. The rest of the year the camp will be rented out.
- The original camp under the original use permit is well-suited for the area. The proposed Major Use Permit includes a commercial element that will greatly impact the community character of the Mussey Grade area. Impacts to community character from a commercial enterprise in an agricultural area (A-70 zone) are not included in the Recirculated Draft EIR and should be addressed. A Major Use Permit is not allowed by right in this zone. This is a large development in a fire-prone, hazardous area and should be characterized as such.

J-9

2

COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, SIGNED BY RADZIK, CHAIR DATED JUNE 9, 2008 (CONTINUED)

Response to Comment J-5:
Please see RDEIR responses to comments D-2, D-3 and IF-2. Section 6.2 of the FPP details the relocation procedures which would include use of large capacity buses, vans and personal vehicles. However, as noted in the FPP, responses to comments D-2 and D-3, relocation would be implemented only if ample time is available. Therefore, 300 cars would not cause unsafe delays during an evacuation.

Response to Comment J-6:
Weather input values for fire behavior modeling runs performed in support of the FPP were derived from inputs used in preliminary BehavePlus runs conducted by County Fire Marshals. The 12, 18, and 24 mph wind speeds used in fire behavior modeling efforts originated from the Goose Valley RAWS (Remote Automated Weather Station), where 19 mph maximum sustained wind speeds and 41mph gusts were documented. The 19 mph and 41 mph maximum documented at Goose Valley were adjusted by a factor of 0.6 to account for vertical differences in wind speed from the 20-foot recording height to mid-flame height prior to BehavePlus modeling efforts. Standard RAWS setup places the anemometer at 20 feet above ground, while wind affecting surface fire spread is that found at mid-flame height. A conservative wind adjustment factor of 0.6 indicates a fuel bed that is unsheltered from the wind with a fuel bed depth greater than 2.7 feet. It should be noted that mid-flame wind speeds may be only 10% of the wind speeds recorded or predicted at 20 feet. This is based on the following quote from BehavePlus Operational Lesson 12: "The wind that affects the surface fire, called midflame wind, may be only 10 percent of the wind speed forecast by the National Weather Service at 20 feet above the vegetation (20-foot wind) (Source: Andrews, Patricia L., Collin D. Bevins, and Robert C. Seli. 2004. BehavePlus Fire Modeling System, Version 3.0: Operational Lession 12. Gen. Tech. Rep. RMRS-GTR-106 Ogden, UT: Department of Agriculture, Forest Service, Rocky Mountain Research Station. 132p.)

To evaluate the effects of higher wind speeds of 35 and 50 mph, observed in 2007 fires, additional BehavePlus runs were conducted. Using an adjustment factor of 0.6, 35 and 50 mph, wind speeds were adjusted to mid-flame speeds of 21 mph and 30 mph, respectively. (Adjustment to midflame speed is done during the variable input phase of the modeling effort. Options for entering wind speed values include directly entering midflame wind speed, or entering 20-foot wind speed and an adjustment factor that is based on the fuel model (e.g., shrub types will reduce the wind speed less than an area with forest cover.) Because RAWS wind data is collected at 20 feet, direct midflame wind speed values are unavailable; therefore, the 20-foot wind speed is used with the fuel model-appropriate adjustment factor.) Based on modeling results for fuel model SH7 (mixed chaparral), the maximum flame length for a 21 mph wind equals 42.3 feet, while that for a 30 mph wind equals 51.3 feet, representing the worst-case scenario on

COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, SIGNED BY RADZIK, CHAIR DATED JUNE 9, 2008 (CONTINUED)

Response to Comment J-6: (cont'd.)
site. Proposed fuel modification zones of 175 feet in width adjacent to steep slopes covered with mixed chaparral vegetation are greater than 3 times the modeled flame length, assuming 30 mph wind speeds.

The Goose Valley RAWS is located at the Palomar Ranger District Office, 1634 Black Canyon Road in Ramona and is the closest weather station to the project site. While this site is north and east of the Salvation Army Camp, an analysis of Santa Ana winds by National Weather Service wind model program (see FPP, page 18, Table 5) showed a strong correlation between Goose Valley and the Mussey Grade Road area. Temperature and relative humidity readings are expected to be similar. (Temperature and humidity have a direct effect on fire behavior, notably in their effect on fuel moisture levels. The drying effect of the Santa Ana winds in both similar locations (Goose Valley and Mussey Grade Road) is directly linked to fuel moisture, and consequently fire behavior. The Goose Valley RAWS presents the best currently available data set for fire weather inputs for the site, given its proximity and documented similarities in weather during Santa Ana events.) Therefore, fire behavior predictions generated based on Goose Valley RAWS wind data should apply to the project site.

The RAWS did not record wind gusts exceeding 50 mph during the 2007 fires. The BehavePlus modeling was based on actual wind data recorded during the 2007 fires (FPP, page 18).

Response to Comment J-7:
The proposed total maximum occupancy of the camp under the Applicant's Preferred Project, at full build-out, would be 748, at any one time. The proposed total maximum occupancy of the camp associated with Reduced Project Alternative I, at full build-out, is 615 persons at any one time. Emergency planning and the FPP assume a maximum occupancy of 615 persons. The proposed total maximum occupancy at of the camp associated with Reduced Project Alternative II at full build-out is 513 persons.

Response to Comment J-8:
Please see DEIR response to comment IF-17.

Response to Comment J-9:
Please see RDEIR responses to comments H-8 and H-43. Please see DEIR responses to comments JCC-2 and JCC-3.

P70-379W2, Salvation Army **Comments, Draft Recirculated EIR**

POSITIVE COMMENTS:

- The fire plan, shelter in place, would benefit the entire Mussey Grade neighborhood.
- The Salvation Army will improve the conditions in the canyon. People on Mussey Grade can shelter at the camp.
- The Salvation Army has always been a benefit to the community. They would accommodate their neighbors who are in great need.
- The Salvation Army has been in the area for over 10 years and they were asked to improve their fire evacuation and safety plan, therefore it will bring more fire safety to their neighborhood.

J-10

CONCLUSION:

Actual, historical data should be used to make calculations for modeling fire in the Draft Recirculated EIR. Studies should be done based on factual evidence to achieve the most accurate predictions on which to base the findings for the project. Wind speeds/gusts should reflect actual, past conditions. Actual road conditions on Mussey Grade Road should be considered when making determinations about traffic. Worst case scenarios should be utilized for both wind and traffic for the maximum number of people the Major Use Permit is to allow.

J-11

Sincerely,

s/Kristi Mansolf, Secretary *for*

HELENE RADZIK, Chair
Ramona Community Planning Group

Cc: Joe Farace, DPLU

3

COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, SIGNED BY RADZIK, CHAIR DATED JUNE 9, 2008 (CONTINUED)

Response to Comment J-10:
The County acknowledges and appreciates this comment. No further response is necessary.

Response to Comment J-11:
Comments noted. Please see responses above.

Comment
Letter K

June 9, 2008

Mr. Joseph Farace
Dept of Planning & Land Use
5201 Ruffin Rd., Suite B
San Diego, CA 92123

RE: P70-379W2
ER 98-14-023, SCH No. 2000031058
Salvation Army Divisional Camp and Retreat

Dr. Mr. Farace,

I am writing to register my support for the Salvation Army Camp project, Reduced Alternative One. I am a member of the Ramona Community Planning Group, and concurrently a member of the following RCPG subcommittees related to this project: South and Transportation & Trails. I have watched the Salvation Army project from the beginning, please include my comments in as part of the public review:

Fire Protection Plan:

1. Shelter-In-Place will be a great benefit during a wildfire emergency for our community, especially to every Mussey Grade Road resident, with the potential of sheltering 1,300 people. This is a much needed element especially since the Cedar Fire's impact in the immediate area and the Witch Creek's affect our community.

2. The improved water availability and fire flow throughout the Mussey Grade Road is an advantage to our community and the fire fighters who will defend the immediate area (page 7, section 1.2, paragraph 2).

3. I support the "extended fuel modification zones to reduce fire intensity in an effort to further assist the Ramona Fire Department," (page 7, section 1.2, paragraph 2).

4. Other Ramona residents, including other Mussey Grade residents support the Salvation Army project and the improvements to their EIR.

Once again, I register my support for this project and I ask the decision making body to approve the Draft EIR, Reduced Alternative One. I welcome the Salvation Army to expand their facilities and continue with the good work they do for their clients and I thank them for being a good neighbor on Mussey Grade Road.

K-1

Yours Truly,

Dr. Luauna Stines,
Member Ramona Community Planning Group
P.O. Box 2677, Ramona, CA 92065
760-789-6207

COMMENT LETTER FROM DR. LUAUNA STINES, DATED JUNE 9, 2008

Response to Comment K-1:
The County acknowledges and appreciates these comments. No further response is necessary.

Comment Letter L

Blackson, Kristin

From: CAROLYN DORROH [carolyndorroh@sv-mail.com]
Sent: Saturday, June 07, 2008 1:59 PM
To: Jones, Cheryl ; Blackson, Kristin
Subject: Public comments on P70-379W2 Draft Recirculated EIR Salvation Army Divisional Camp & Retreat

Comments on: **P70-379W2, SCH NO. 2000031058, SALVATION ARMY DIVISIONAL CAMP AND RETREAT, DRAFT RECIRCULATED EIR**

I ask that studies use realistic baseline figures by using actual historic data for sustained winds and wind gust experienced in Ramona during wildfires rather than using an arbitrary number to diminish the study outcome. The Ramona Airport has a weather reporting station. During the Which Creek fire, firemen reported horizontal flames to be several hundred feet long. When addressing traffic flow, traffic studies need to address the actual road to be used by the camp. That road is substandard in road width, has no shoulders in places, has side friction from roads, and driveways intersecting with it and could come to a standstill in the event of a stalled vehicle or accident. Evacuating vehicles will include large motor homes, busses and trucks pulling livestock trailers. I ask that all studies address worst case scenarios using the maximum number of camp and Mussey Grade Roads occupants and vehicles. I believe that those are the realities that will impact traffic flow. L-1

I was born and raised up on Bayou Lafourche, 30 miles southwest of New Orleans, and have quite a bit of experience with taking shelter during a catastrophic event like hurricanes. I will convey some of my concerns based on those real life experiences and ask questions that come to mind about a shelter in place situation. L-2

During one hurricane, the high school gym that we were in began to cave in during the high winds phase of the hurricane. In a heart beat, there was great need for medics and family services. People's wounds needed to be dressed, some had to be carried on stretchers and total strangers had to deal with the unattended frightened children. The most vivid memory that I have as a child in this situation is seeing 3 children crying, screaming for momma and reaching for her as they ran after a stretcher holding a woman with bloody bandages wrapped completely around her head. The havoc that can arise during a catastrophic event can separate family members. As that public evacuation center continued to crumble, panic worsened and an outcry demanding better shelter ensued. The response required that all voluntarily subject themselves to great risk. During the high winds of the hurricane, the public was asked to move to the nearest two story classroom building. I remember looking out that gym seeing two rows of men side by side with interlocking arms, to keep from blowing away, forming two human chains connecting to the other building. As a child unable to stay on the ground, I literally pulled myself on the bodies of the men forming the chain to the other building. Airborne debris was everywhere. Even though it was daytime, it was dark as night without any lights. I can tell you that there is a wide variety of responses from people as they sit in a shelter that is taking a beating. L-3

What is the plan in the event that the shelter in place facility fails or becomes damaged by the catastrophic wildfire? L-4

- How does shelter in place deal with excessive temperatures should the public need to be exposed to them?
- Our homes and consumer products put off toxic fumes when burning. How does shelter in place deal with air quality? L-5
- How does shelter in place deal with oxygen depletion in the face of a massive wall of fire? L-6

6/10/2008

COMMENT LETTER FROM CAROLYN DORROH, DATED JUNE 7, 2008

Response to Comment L-1:
The County disagrees with this comment. While the Ramona Airport is a weather station, it does not track fuel moisture and other fire behavior model inputs.

Please see response to comments H-17 and H-32 regarding flame lengths and modeled wind speeds and utilizing past fire circumstances in the analysis.

Please see response to comment H-29 regarding the adequacy of the primary road.

Please see responses to comments D-2 and D-3 regarding a wildfire evacuation scenario.

Response to Comment L-2:
Comment noted.

Response to Comment L-3:
Please see response to comment D-6 regarding the shelter-in-place program.

The County concurs with the comment that there are inherent risks to all occupants of the proposed project and that a catastrophic event such as a wildfire is devastating to the community. The preferred option is to relocate camp occupants, if feasible.

The County does not dispute the negative psychological impact a wildland fire experience would have on individuals; however, this is a social issue that need not be analyzed under CEQA.

Response to Comment L-4:
The shelter-in-place structure is designed to protect the public from exposure to "excessive temperatures." The width of the proposed fuel modification zone around the proposed shelter-in-place facility is 175 feet, which is 3 times the predicted flame length. Moreover, the shelter-in-place structure would be built with ignition resistant materials pursuant to County Building Code, Chapter 7A. The large fuel modification zone around the structure will prevent flames from reaching the building, and the ignition resistant construction material will prevent the embers from igniting the structure. In the unlikely instance that the shelter-in-place facility "fails," other structures on-site could be used to shelter from the fire. All structures on the site will be constructed to the latest codes, including ignition resistant features and would include interior sprinklers. Older structures will be made safer by retrofitting with specific measures, such as vent protection and fire sprinklers.

COMMENT LETTER FROM CAROLYN DORROH, DATED JUNE 7, 2008

(CONTINUED)

Response to Comment L-5:
The shelter-in-place occupants will be safe from potential bad air quality by sheltering inside the enclosed shelter-in-place facility.

Response to Comment L-6:
The large fuel modification zone around the structure will prevent flames from reaching the building, and the ignition resistant construction material will prevent the embers from igniting the structure. Furthermore, the vegetative fuels adjacent to the fuel modification zones are primarily low intensity fuels such as non-native grasses. Therefore, it is highly unlikely that there would be a "wall of fire" depleting the oxygen in the area. Please see RDEIR response to comment D-6 regarding successful shelter-in-place examples.

Comment Letter L (cont'd.)

- How does shelter in place deal with medical needs arising during the catastrophic event and its aftermath? L-7
- How many days supply does the shelter in place have stocked of a medical supplies, food, water, toiletries, etc. for the camp's maximum occupancy? L-8

Thanks,
Carolyn Dorroh
Ramona Community Planning Group Member
17235 Voorhes Lane
Ramona, CA 92065
(760) 789-4429
carolyndorroh@sv-mail.com

6/10/2008

COMMENT LETTER FROM CAROLYN DORROH, DATED JUNE 7, 2008

(CONTINUED)

Response to Comment L-7:
The shelter-in-place facility is not proposed to serve as a medical clinic. However, basic first aid would be available in the facility. The shelter-in-place facility shall contain emergency preparedness kits, including medical related equipment (i.e. supplemental oxygen, pain relievers, inhalers, etc.), to make brief shelter-in-place stay as comfortable as possible (see page 47 of the FPP).

Response to Comment L-8:
Shelter-in-place would not be expected to last more than one day; therefore, extensive supplies of food, water, etc. would not be necessary.

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SALVATION ARMY DIVISION CAMP AND RETREAT CENTER

FINAL EIR

RESPONSE TO COMMENTS

ON THE

FEBRUARY 2005 DRAFT EIR

Comment Letter A

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
SAN DIEGO FIELD OFFICE
16885 WEST BERNARDO DRIVE, SUITE 300A
SAN DIEGO, CALIFORNIA 92127

REPLY TO
ATTENTION OF:

February 24, 2005

RECEIVED
FEB 2 8 2005
BRG CONSULTING

Office of the Chief
Regulatory Branch

Salvation Army
Sierra del Mar Division
2320 Fifth Avenue
San Diego, California 92101

Dear Sir or Madam:

It has come to our attention that you plan to expand the existing Salvation Army Divisional Camp and Retreat in the southwestern portion of the Ramona Community/Regional Planning Area within an unincorporated area of San Diego County, California. The project would include the expansion of multiple camp facilities including cabin and tent camping areas, staff housing, maintenance facilities, support facilities, and recreation facilities. This activity may require a U.S. Army Corps of Engineers permit. **A1**

A Corps of Engineers permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to,

1. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;

2. mechanized landclearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;

3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States;

4. placing pilings when such placement has or would have the effect of a discharge of fill material.

Please visit our website at www.spl.usace.army.mil/regulatory for permit applications and information about our program. If you have any questions, please contact me at (858)

RESPONSE TO COMMENT LETTER FROM DEPARTMENT OF THE ARMY, U.S. ARMY CORPS OF ENGINEERS, DATED FEBRUARY 24, 2005

Response to Comment A1:
The County concurs with this comment. As identified in EIR Section 1.3.1, Matrix of Project Approvals/Permits, the U.S. Army Corps of Engineers is identified as a Responsible Agency pursuant to CEQA Guideline §15381. The County acknowledges that implementation of the Applicant's Preferred Project, or either of the reduced project alternatives, will require the issuance of a Clean Water Act Section 404 Permit.

674-5384. Please refer to this letter and 200500799-LAI in your reply.

Sincerely,

Laurie Monarres

Laurie A. Monarres
Project Manager

A1
(cont'd)

Cc:
BRG Consulting, Inc.
Attention: Kiersten Giugno
304 Ivy Street
San Diego, CA 92108

03/29/2005 10:24 FAX 916 657 5390 NAHC

Comment Letter B

STATE OF CALIFORNIA Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 – Fax

March 28, 2005

Ms. Kristen Blackson
San Diego County DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Re: Proposed Salvation Army Divisional Camp and Retreat DEIR
SCH# 2000031058

Dear Ms. Blackson:

Thank you for the opportunity to comment on the above-mentioned document. The Commission was able to perform a record search of its Sacred Lands File for the project area, which failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the Sacred Lands File does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites. **B1**

Early consultation with tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed is a list of Native Americans individuals/organizations that may have knowledge of cultural resources in the project area. The Commission makes no recommendation of a single individual or group over another. Please contact all those listed; if they cannot supply you with specific information, they may be able to recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If you have not received a response within two weeks' time, we recommend that you follow-up with a telephone call to make sure that the information was received.

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should consider avoidance, as defined in Section 15370 of the CEQA Guidelines, when significant cultural resources could be affected by a project. Provisions should also be included for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA), Public Resources Code §15064.5 (f). Health and Safety Code §7050.5; and Public Resources Code §5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-6251. **B2**

Sincerely,

Carol Gaubatz
Program Analyst

Cc: State Clearinghouse

RESPONSE TO COMMENT LETTER FROM NATIVE AMERICAN HERITAGE COMMISSION, DATED MARCH 28, 2005

Response to Comment B1:
The County acknowledges and appreciates this letter. As part of the environmental review of this project, County of San Diego qualified archaeologist Sinead N. Ghabhláin with ASM Affiliates conducted a cultural resources survey in March 2001. One historic site was identified consisting of a late 1930's historic building with associated foundation pads and trash dump. The survey, along with a search of the historic records, determined that this resource does not retain integrity of design, workmanship or materials and is not significant under CEQA or County RPO.

An earlier survey conducted by ASM Affiliates in February 1999 included a records search, and a field survey. The survey determined that there are five prehistoric archaeological sites located within the project footprint.

Subsequently, four of these sites were tested and evaluated between February 1999 and March 2000 and determined not to meet the requirements of significance in accordance with the CEQA Guidelines and the County of San Diego Resource Protection Ordinance (RPO). The evaluation was conducted under the direction of County approved archaeologist, John R. Cook with ASM Affiliates. The fifth site was not tested since it will be within a riparian open space easement.

Letters have been sent to the Native American individuals/organizations provided by the NAHC for their input. See response to comments item JCR1 for a list of the tribes contacted and the follow-up responses. No responses were received from tribes as a result of this recent consultation that indicated the presence of additional archaeological resources within the project site that have not already been identified through archaeological surveys. However, Carmen Lucas, Kwaaymii Laguna Band Elder, called the County on August 8, 2005 concerning this project and strongly recommended that grading monitoring be required. Please see DEIR response to comment B2.

Response to Comment B2:
The County concurs that lack of surface evidence of archaeological resources does not preclude the existence of archaeological resources. The request to include a provision for the accidental discovery of archaeological resources or human remains is covered by the ordinance. Section 87.429 of the San Diego County Grading, Clearing, and Watercourses Ordinance requires that, "if, in the process of grading operations, human remains or Native American artifacts are encountered, grading operations shall be suspended in that area and the operator shall immediately inform the County Official, and the requirements of the Health and Safety Code Section 7050.5 and Public

RESPONSE TO COMMENT LETTER FROM NATIVE AMERICAN HERITAGE COMMISSION, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment B2: (cont'd.)
Resources Code Section 5097.99 shall be complied with." Therefore, the project will comply with the comment because the Grading Ordinance requires grading monitoring. The Final EIR on page 2.6-6 has been revised to clarify the Grading Ordinance requirement.

03/29/2005 10:24 FAX 916 657 5390 NAHC

B
Attachment

Native American Contacts
San Diego County
March 28, 2005

Barona Group of the Capitan Grande
Rhonda Welch-Scalco, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona.org
(619) 443-6612

Jamul Indian Village
Leon Acevedo, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul , CA 91935
jamulrez@pacbell.net
(619) 669-4785
Fax: (619) 669-4817

Barona Group of the Capitan Grande
ATTN: David Baron
1095 Barona Road Diegueno
Lakeside , CA 92040
(619) 443-6612

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

Barona Group of the Capitan Grande
ATTN: EPA Specialist
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona.org
(619) 443-6612

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
(619) 443-6612
(619) 443-0681 FAX

Coastal Gabrieleno Diegueno
Jim Velasques
5776 42nd Street Gabrielino
Riverside , CA 92509 Kumeyaay
(909) 784-6660

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center , CA 92082
(760) 749-3200
(760) 749-3876 Fax

Inaja Band of Mission Indians
Rebecca Osuna, Spokesperson
309 S. Maple Street Diegueno
Escondido , CA 92025
inaja_cosmite@hotmail.com
(760) 737-7628
(760) 747-8568 Fax

Sycuan Band of Mission Indians
Danny Tucker, Chairperson
5459 Dehesa Road Diegueno/Kumeyaay
El Cajon , CA 92021
sycuan.com
619 445-2613
619 445-1927 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed Salvation Army Divisional Camp and Retreat DEIR, SCH# 2000031058, San Diego County.

RESPONSE TO COMMENT LETTER FROM NATIVE AMERICAN HERITAGE COMMISSION, DATED MARCH 28, 2005 (CONTINUED)

Attachment to Comment Letter B:
This attachment provides a list of Native American Contacts. Please see response to comment JCR1.

Native American Contacts
San Diego County
March 28, 2005

Viejas Band of Mission Indians
Anthony Pico, Chairperson
PO Box 908
Alpine , CA 91903
daguilar@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

Diegueno/Kumeyaay

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed Salvation Army Divisional Camp and Retreat DEIR, SCH# 2000031058, San Diego County.

Comment Letter C

San Diego County Archaeological Society, Inc.

Environmental Review Committee

26 March 2005

To: Ms. Kristin Blackson
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

Subject: Draft Environmental Impact Report
Salvation Army Divisional Camp and Retreat
P70-379W^2, Log No. 98-14-023

Dear Ms. Blackson:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its Appendices D1, D2 and D3, we have the following comments: **C1**

(1) It appears from the three appendices that the 1928-29 aerial photographs of the project area and historical maps available at the County's Cartographic Services desk were not inspected. We would recommend that they be checked.

(2) Assuming that (1) does not indicate a need to consider additional resources, we agree with the impact analysis and mitigation recommendations as presented in the DEIR.

Thank you for providing this DEIR to SDCAS for our review and comment.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: ASM Affiliates
SDCAS President
File

RESPONSE TO COMMENT LETTER FROM SAN DIEGO COUNTY ARCHAEOLOGICAL SOCIETY, INC., DATED MARCH 26, 2005

Response to Comment C1:
The comment is correct that the 1928-29 aerial photographs and historical maps were not checked. However, based on the Cultural Resources Significance Evaluation (Appendix D1 of the EIR), the structures within the project site do not meet the criteria for significant historic resources. Historical photos and maps must be researched only when the potential site meets the criteria for significant historical resources. Therefore, the County will not require that the photos and maps be checked.

Comment Letter D

RAMONA MUNICIPAL WATER DISTRICT
105 Earlham Street
Ramona, CA 92065-1599
Telephone:
(760) 789-1330

March 23, 2005

San Diego County
Department of Planning and Land Use
5201 Ruffin Road
San Diego, CA. 92123

RE: P70-379W2, LOG NO. 98-14-023; SCH NO. 2000031058; SALVATION ARMY DIVISIONAL CAMP AND RETREAT

The Ramona Municipal Water District, as the responsible agency, submits this supplemental comment to the draft EIR for the extension of the Salvation Army Camp in consideration of the Cedar Fire and potential impact upon Mussey Grade Road in the event an evacuation during a major catastrophe such as the Cedar Fire. **D1**

Be advised that the project require a secondary access onto Dos Picos Park Road or Highway 67, and not onto Mussey Grade Road south of Dos Picos Park Road.

Please consider this comment as an additional condition that shall be included in the Major Use Permit to mitigate for Hazards and Public Safety impacts related to potential fires in the project area under Section 9.1.3 Hazards and Hazardous Materials, item MM 2.3.b.

Thomas L. Brammell
General Manager

RESPONSE TO COMMENT LETTER FROM RAMONA MUNICIPAL WATER DISTRICT, DATED MARCH 23, 2005

Response to Comment D1:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials and RDEIR responses to comment Letter D.

03/28/2005 16:39 5574190

Comment Letter E

LAFCO
San Diego Local Agency Formation Commission

1600 Pacific Highway • Room 452 • San Diego, CA 92101
(619) 531-5400 • FAX (619) 557-4190
Website: www.sdlafco.org

Chairman
Bud Pocklington
South Bay Irrigation District

Vice Chairman
Andrew L. Vanderlaan
Public Member

Members
Donna Frye
Councilmember
City of San Diego

Betty Rexford
Councilmember
City of Poway

Patsy Davis
Councilmember
City of Chula Vista

Bill Horn
County Board of Supervisors

Dianne Jacob
County Board of Supervisors

(Vacant)
Special District Representative

Alternate Members
Greg Cox
County Board of Supervisors

Harry Mathis
Public Member

Andrew J. Menshek
Padre Dam Municipal Water District

(Vacant)
Councilmember
City Representative

(Vacant)
Councilmember
City of San Diego

Executive Officer
Michael D. Ott

Counsel
William D. Smith

March 28, 2005

RECEIVED
MAR 28 2005
San Diego County
DEPT. OF PLANNING & LAND USE

County of San Diego
Department of Planning and Land Use
Project Processing Counter
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: Notice of Availability of a Draft EIR (Salvation Army Divisional Camp and Retreat, P70-379W, Log No. 98-14-023)

Thank you for allowing the San Diego LAFCO to provide comments on the above referenced project. LAFCO is responsible for encouraging the efficient provision of public services and has purview over changes to local government organization, expansion / activation of latent powers, and any associated sphere of influence actions. Usually, LAFCO is a responsible agency for environmental review when jurisdictional changes and/or sphere amendments are proposed. Within its discretionary review, LAFCO can only utilize environmental documents that contain a discussion of the ability of existing agencies to provide services, a description of existing infrastructure, how the project area is proposed to receive public services, and the associated jurisdictional, sphere of influence, and municipal service review changes. Therefore, we offer the following comments: **E1**

The project description indicates that a 10.8-acre parcel will require annexation to the Ramona Municipal Water District (MWD) for the provision of fire protection service, but does not supply the assessor's parcel number (APN) to identify the affected parcel. LAFCO staff was unable to identify a parcel of that size (10.8 acres) that is outside of the Ramona MWD. Please provide an APN to indicate the specific parcel in need of annexation. **E2**

As the boundary of the Ramona MWD is co-terminus with its sphere of influence in the vicinity of the proposed project area, an annexation to the district would require an amendment to its sphere. In addition, annexation of territory outside of the district's boundary and sphere may also require concurrent annexation to the San Diego County Water Authority (CWA) and Metropolitan Water District (MET). Therefore, the EIR should identify and discuss the possible sphere amendment and the potential actions affecting CWA and MET. **E3**

RESPONSE TO COMMENT LETTER FROM LAFCO, DATED MARCH 28, 2005

Response to Comment E1:
The comment summarizes LAFCO's role as a responsible agency. Therefore, a response is not required.

Response to Comment E2:
The 10.8-acre area that will require annexation to the Ramona Municipal Water District (RMWD) for fire protection purposes is comprised of two parcels (not one parcel as referenced by the comment). The Assessor Parcel Numbers (APNs) of the two parcels are 322-030-02 and 322-031-02.

Response to Comment E3:
The County concurs with this comment and the Final EIR has been revised to reflect the information provided. The potential actions identified by the comment – an amendment to the Ramona MWD Sphere, and concurrent annexation to the San Diego County Water Authority and the Metropolitan Water District have been added to EIR Section 1.3.1. The San Diego County Water Authority (CWA) and Metropolitan Water District (MET) are also identified as Responsible Agencies pursuant to CEQA Guideline §15381 within Section 1.3.1 of the Final EIR. The County concurs that, as responsible agencies, these agencies would utilize the information contained in the EIR to support these actions. The Final EIR provides an analysis of public service requirements for the proposed project (see Section 6.2.4), and no further change to this analysis is necessary as a result of the identification of these actions. The County has provided the correct APN's to LAFCO in separate correspondence.

Because the proposed project requires changes to local governmental organization and/or adopted spheres of influence, San Diego LAFCO will be a responsible agency for environmental review. Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (619) 531-5409. E4

Sincerely,

ROBERT BARRY
Local Governmental Analyst

RB:tjc

2

RESPONSE TO COMMENT LETTER FROM LAFCO, DATED MARCH 28, 2005

(CONTINUED)

Response to Comment E4:
The County agrees with, and acknowledges LAFCO's status as a Responsible Agency pursuant to CEQA Guideline §15381 as identified in EIR Section 1.3.1 Matrix of Project Approvals/Permits.

Comment Letter F

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

February 14, 2005

Kristin Blackson
Dept. of Planning and Land Use
County of San Diego
5201 Ruffin Rd., Suite B
San Diego, CA 92123-1666

RECEIVED
FEB 23 2005
DEPT. OF PLANNING & LAND USE

RE: P70-379W, Salvation Army Divisional Camp and Retreat

Dear Ms. Blackson:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the draft environmental impact report (DEIR) for this proposed Major Use Permit Modification. There are clearly major questions as to the scale of the proposed expansion of this facility, but our comments will be limited to conformance with biological ordinances.

1. The proposed project is inconsistent with the Biological Mitigation Ordinance (BMO) and with the Resource Protection Ordinance (RPO).

We fully concur with the DEIR that only the *reduced project alternatives*, rather than the proposed project, comply with multiple BMO criteria (2.2-15ff), such as edge effects and corridors. The fragmentation of BRCA produced by the proposed retreat location would be unacceptable. We also concur with the finding of non-compliance with RPO for the proposed project, due to wetlands and sensitive lands impacts. Clearly, the retreat must be eliminated or relocated. **F1**

The applicant's objective regarding the retreat (#4 on page 1-12) is unconvincing and internally contradictory. If the project as a whole succeeds in meeting its objectives of retaining the natural beauty and rural character of the site in a "harmonious" manner (#2, #3, and #5 on page 1-12), then many portions of the development footprint should function well for retreat purposes. If not, then there is clearly something very wrong with how the project has been designed. To contend that, within an overall rural and natural setting, the retreat must be in a completely separate location is unreasonable. We also note that the "retreat" is intended to function largely as a conference center. **F2**

2. All the build alternatives, proposed and reduced project alike, are inconsistent with the BMO due to failure to avoid BRCA to the maximal extent practicable. **F3**

The DEIR and the BMO conformance findings assert that simply meeting a minimum mitigation ratio equals BMO conformance. This is contrary to the BMO, which establishes maximal avoidance as the primary step in impact mitigation. According to longstanding,

8424-A Santa Monica Blvd. #592, Los Angeles, CA 90069-4267 • www.ehleague.org • Phone 213.804.2750 • Fax 323.654.1931

RESPONSE TO COMMENT LETTER FROM ENDANGERED HABITATS LEAGUE, DATED FEBRUARY 14, 2005

Responses to Comments F1 through F4:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comment Letter G.

standard County practice, avoided lands are dedicated as biological open space through easement. If "avoided" lands are left open for future development, this can hardly be termed mitigation under the plain meaning of the ordinance.

F3 (cont'd)

Application of the ratios is only a secondary step in the mitigation process, applied to compensate for remaining unavoidable impacts. Otherwise, these ratios would certainly not have been set at their very low levels. If on-site habitat is biologically viable, there may be on-site crediting. Otherwise, off-site mitigation at the prescribed ratios is required. Using avoidance as the first step in impact mitigation is also consistent with CEQA.

There is no reason why entitlements for the intensive use of a property through the major use permit process – as opposed to a subdivision – should be exempt from standard practice, and thereby leave the majority of the site unprotected and subject to future piecemeal development, including residential subdivision. The DEIR and the BMO findings need substantial revision to correct this structural error, which would create a terrible precedent for how the major use permit process intersects with the MSCP and BMO. *All avoided lands should be placed in biological open space easement as a condition of project approval.* However, due to site characteristics, on-site crediting would be appropriate in this case. F4

In limiting these comments to biological resources and BMO and RPO conformance, EHL neither endorses nor opposes the project as a whole.

Sincerely,

Dan Silver
Executive Director

cc: Bob Copper, LUEG
Gary Pryor, DPLU
Glenn Russell, PhD, DPLU
Eric Gibson, DPLU
Mindy Fogg, DPLU

Comment Letter G

THE CITY OF SAN DIEGO

March 25, 2005

Ms. Kristin Blackson
Environmental Management Specialist
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road
San Diego, CA 92123

Subject: Draft Environmental Impact Report, Salvation Army Divisional Camp and Retreat, P70-379W², Log No. 98-14-023; SCH No. 2000031058.

Dear Ms. Blackson:

The City of San Diego Water Department has reviewed this document and offers the following comments:

1. The document makes no mention of impacts from pollutants of concern [nutrients (nitrogen or phosphorus), total organic carbon, salts (total dissolved solids)] to drinking water sources (San Vicente Reservoir) as described in the City of San Diego's *Source Water Protection Guidelines for New Development*, 2004. This guidance document was prepared in collaboration with technical representatives from the County of San Diego, the City of Chula Vista, the Building Industry Association, the County Water Authority, City of Escondido, Ramona Water District, and Santa Fe Water District. **G1**

   In addition, the San Vicente Reservoir is part of the City's Cornerstone Lands, associated with the Mulitiple Species Conservation Program. This should be mentioned in the Biology and Land Use Sections. The area around this reservoir provides important north-south and east-west connections for wildlife and supports a rich assemblage of sensitive plant and animal species. **G2**

2. Chapters 3 (Cumulative Impacts) and 6 (Environmental Effects Fount Not To be Significant):

   To what extent would the proposed project impact drinking water supply and groundwater resources in this watershed and in particular to San Vicente Reservoir? **G3**

   These sections need to address the potential effects this project could have on the City of San Diego's water supply reservoir (San Vicente Reservoir) that is located

Operations Division
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Tel (619) 527-7470 Fax (619) 527-7412

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, DATED MARCH 25, 2005

Response to Comment G1:
The County disagrees that the City of San Diego's *Source Water Protection Guidelines for New Development, 2004*, would apply to the project. The proposed project is located within an unincorporated portion of the County of San Diego; therefore, the project is subject to County of San Diego water quality regulations, and City of San Diego regulations do not apply to the proposed project. While the project and the EIR do not specifically apply the City of San Diego's *Source Water Protection Guidelines for New Development, 2004*, the project will comply with the County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance (WPO) (County Code §67.801 et seq.), and the County of San Diego Standard Urban Storm Water Management Plan (SUSMP) Table 3.1, which will reduce any potential water quality impact associated with the proposed project to a level less than significant. The purposes of the WPO and SUSMP are to ensure that the County is compliant with applicable state and federal law. The responsibility for administration of this Ordinance is the County of San Diego, not the City of San Diego. Stormwater and non-stormwater discharges regulated under a valid facility-specific National Pollutant Discharge Elimination System permit issued by the U.S. Environmental Protection Agency (NPDES Permit) or facility-specific California Regional Water Quality Control Board for the San Diego Region (RWQCB) Waste Discharge Requirements permit are not subject to this Ordinance, but are instead regulated exclusively by the RWQCB. NPDES Permit No. CAS 0108758 is the RWQCB Order No. R9-2007-0001, "Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, and the San Diego Unified Port District and the San Diego County Regional Authority."

The Final EIR identifies the comprehensive list of Best Management Practices (BMPs) that have been incorporated into, or will be incorporated into the project as part of project operation, in order to minimize impacts associated with site hydrology, soil conditions, and potential pollutants (EIR Section 6.1.3). The proposed BMPs are identified in the Storm Water Management and Maintenance Plan (SWMP) prepared by Fuscoe Engineering for the project (EIR Appendix G). The BMPs are accepted standard measures designed to reduce the potential hydrology and water quality impacts to a level less than significant. Implementation of the BMPs identified in the EIR would reduce potential water quality impacts to the San Vicente Reservoir to below a level of significance.

Pollutants of concern identified by the comment ("nutrients (nitrogen or phosphorus), total organic carbon, and salts") are addressed by the SUSMP, Table 3.1, Anticipated and Potential

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, DATED MARCH 25, 2005 (CONTINUED)

Response to Comment G1: (cont'd.)
Pollutants Generated by the Land Use Type. The Salvation Army project would be classified as a "Commercial Development (Priority Project Category iii)" which applies to any development on private land that is not exclusively heavy industrial or residential uses. The category includes, but is not limited to recreational facilities. The project would also be classified as a "Parking Lot (Priority Project Category viii)" which applies to a land area or facility for the temporary parking or storage of motor vehicles used personally, or for business or commerce.

County of San Diego Standard Urban Stormwater Mitigation Plan (SUSMP), section 3.1 (Identify Pollutants and Conditions of Concern) under General Categories of Water Pollution shows Anticipated and Potential Pollutants Generated by Land Use as follows:

Nutrients – a potential pollutant for both Commercial Development and Parking Lots if landscaping exists on-site. Nutrients are inorganic substances, such as nitrogen and phosphorus. They commonly exist in the form of mineral salts that are either dissolved or suspended in water. Primary sources of nutrients in urban runoff are fertilizers and eroded soils. Excessive discharge of nutrients to water bodies and streams can cause excessive aquatic algae and plant growth. Such excessive production, referred to as cultural eutrophication, may lead to excessive decay of organic matter in the water body, loss of oxygen in the water, release of toxins in sediment, and the eventual death of aquatic organisms.

Organic Compounds – a potential pollutant for Commercial Development if the project includes uncovered parking areas. Organic Compounds are carbon-based. Commercially available or naturally occurring organic compounds are found in pesticides, solvents, and hydrocarbons. Organic compounds can, at certain concentrations, indirectly or directly constitute hazard to life or health. When rinsing off objects, toxic levels of solvents and cleaning compounds can be discharged to storm drains. Dirt, grease, and grime retained in the cleaning fluid or rinse water may also adsorb levels of organic compounds that are harmful or hazardous to aquatic life.

Therefore, the specific pollutants identified by the comment have been addressed by the project's conformance with County Code (WPO). Please see revisions to the Final EIR pages 6-10 and 6-11, and the *Storm Water Management and Maintenance Plan (SWMP,) Appendix G.*

Response to Comment G2:
The County acknowledges that the San Vicente Reservoir is a component of the City's Cornerstone Lands of the City's MSCP. The EIR addresses the proposed project's

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, DATED MARCH 25, 2005 (CONTINUED)

Response to Comment G2: (cont'd.)
impact to open space preserve areas (which are considered cornerstone lands within the MSCP preserve network) and wildlife corridors that are applicable to the proposed project (EIR pages 2.2-11, 2.2-15, 2.2-21), including the wildlife corridors which connect to the San Vicente Reservoir and surrounding lands. The San Vicente Reservoir is located over three miles from the project site, and this area would not be directly or indirectly impacted by the project. However, the West Fork of the San Vicente Creek traverses the project site, and as such, the project's potential direct and indirect impacts are analyzed in the EIR. The EIR states, "The project site's contiguous riparian habitat oak woodlands serve as a local corridor, particularly those associated with the West Fork of San Vicente Creek." (Final EIR page 2.2-12). The County's MSCP and BMO contain design standards/criteria for corridors and linkages. As discussed in the EIR (EIR page 2.2-13), because the project site does not contain any linkages, only the criteria regarding corridors apply to the proposed project. EIR pages 2.2-21 through 2.2-24 provide a detailed analysis of the project's consistency with corridor criteria as related to the West Fork of the San Vicente Creek. Please see RDEIR response to comment I18.

Response to Comment G3:
The proposed project will not utilize groundwater for drinking or irrigation purposes. As such, the project will not reduce the amount of drinking water available for such purposes by other uses within the region. Pursuant to Section G6.5 of the County Stormwater Standards Manual, infiltration BMPs shall meet seven requirements to be considered feasible for a project site. Of the seven requirements, five were developed for the purposes of protecting groundwater quality. Appendix E of the SWMP addresses these requirements to clarify that the infiltration basin/Rain Garden is not anticipated to have any impact on groundwater resources in the watershed. Extended detention basins and biofilters (vegetated swales) are additional treatment control BMPs proposed to treat runoff for the majority of the project. These Treatment Control BMPs do not utilize infiltration for pollution removal; therefore, they are not anticipated to have any impact on groundwater resources in the watershed.

In addition to the 3 Treatment Control BMPs, the project proposes 12 Site Design BMPs, 20 low impact development BMPs, and 24 Source Control BMPs to address the pollutants of concern for the project. The importance of the San Vicente Reservoir is noted, and the incorporation of the 59 BMPs (See Final EIR Appendix G) prescribed for this project will address potential impacts to the reservoir to the maximum extent practicable in accordance with County of San Diego Watershed Protection Ordinance (WPO) Section 67.803. Therefore, the project is not anticipated to have any impact on groundwater resources in the watershed.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, DATED MARCH 25, 2005 (CONTINUED)

Response to Comment G3: (cont'd.)
The existing camp is served by a standard septic system with leach fields. The expanded camp will also be served by a standard septic system with leach fields. Pursuant to County Code § 67.806(g) & 67.808(h), the project will treat stormwater runoff before it enters receiving waters. Infiltration basins, grass swales and Best Management Practices (BMPs) will be used to prevent adverse hydrology/water quality impacts. A separate septic system analysis and report has been provided to the Department of Environmental Health (Vinje and Middleton Engineering, Inc. 2001, updated 2009), covering detailed percolation tests and calculations of the proposed system. The proposed septic system will meet the Department of Environmental Health requirements for septic systems and will not affect the West Fork of the San Vicente Creek.

EIR Section 6.1.3.1 and the *Storm Water Management and Maintenance Plan (SWMP) for Salvation Army Divisional Camp and Retreat Center* (Fuscoe Engineering, 2009) provided in EIR Appendix G address site drainage and runoff impacts of the proposed project. Each of these documents specifically recognize that the project site includes several drainages, including two blue line streams that generally trend west to east and either discharge directly into or are otherwise hydrologically connected to the west Branch of the San Vicente Creek. The BMPs identified in the EIR and SWMP would reduce the potential water quality impact to these surface waters to a level less than significant.

The SWMP prepared for the project identifies potential construction related pollutants as sediment and construction material waste. Sediment is possible from grading operations, erosion, and poor stockpile management. Construction material waste results from improper handling and disposal of waste materials, such as empty bags of cement or empty cans of paint and not having a designated concrete washout area. Post-construction potential pollutants and sources are identified in Table 4 of SWMP. Table 4 identifies the following:

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, DATED MARCH 25, 2005 (CONTINUED)

Response to Comment G3: (cont'd.)

Source	Potential Pollutant
Housing Facilities	Trash and Debris Cleaning Agents
Site Maintenance	Weed Killer
Dining Facility	Grease Cleaning Agents
Parking Lots & Roads	Heavy Metals Trash and Debris Oil and Grease
Swimming Pool	Chlorine Muratic Acid
Picnic Areas	Trash and Debris
Maintenance Facilities	Oil and Grease Heavy Metals Trash and Debris Cleaning Agents

A complete listing of all project BMPs are included in EIR Section 6.1.3 and duplicated in Section 9.3.4.

A majority of the site improvements will occur in the flatter areas of the site with soils identified as having only slight or slight to moderate erosion hazard. In order to mitigate any potential increase in erosion, all disturbed areas will be landscaped. In addition, all steep roads will be constructed with asphalt berms to mitigate any erosion that might occur parallel to new roads that have been cut into slopes. No increase in erosion on site is expected. Detention basins will be used to detain flows such that post-development discharges match pre-development conditions. Detention basins will also be designed with riprap to decrease the discharge velocity. No changes in downstream erosion potential are anticipated.

Therefore, the proposed project addresses potential impacts to the San Vicente Reservoir.

downstream from this development. Currently, it is a major drinking water source for the City of San Diego. G3 (cont'd)

Please use the City of San Diego's *Source Water Protection Guidelines for New Development*, 2004, as a framework to determine the level of impacts anticipated and to incorporate appropriate Best Management Practices (BMP's) to maximize the protection of source water and groundwater resources. These include but are not limited to BMP's to reduce or eliminate nutrients, total organic carbon, total dissolved solids or sediment from entering the Reservoir. G4

Contact Jeff Pasek, Senior Biologist, at (619) 668-3240 for additional information about the *Source Water Protection Guidelines for New Development*, 2004.

Please submit 3 copies of the final EIR to the City of San Diego as follows: G5

Chris Zirkle, Assistant Deputy Director (one copy)
Environmental Analysis Section
Land Development Review Division
Development Services Department
1222 First Avenue
San Diego, CA 92101-4112

Mike Gonzales, Senior Planner (2 copies)
CIP Financing and Planning Division
Water Department
600 B Street
San Diego, CA. 92101-4112

If you have any questions, please contact Cathy Cibit, Watershed Project Officer, at (619) 527-7405.

Sincerely,

Cathy Cibit

Cathy Cibit
Watershed Project Officer

Cc: Bob Collins, Stormwater/Watershed Program Manager, Water Operations Division, Water Department
Vic Bianes, Deputy Director, CIP Program Management Division, Water Department
Jesus Meda, Senior Civil Engineer, Water Operations Division, Water Department
Jeffery Pasek, Senior Biologist, Water Operations Division, Water Department
Arlene Dea Deeley, Associate Civil Engineer, Water Operations Division, Water

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, DATED MARCH 25, 2005 (CONTINUED)

Response to Comment G4:
Please see DEIR response to comment G1.

Response to Comment G5:
The Final EIR will be available on the Department of Planning and Land Use website (www.sdcounty.ca.gov) prior to the hearing.

Department
Mike Gonzales, Senior Planner, Water Policy, CIP Finance & Planning Division, Water Department
Cindy Kinkade, Associate Planner, Water Policy, CIP Finance & Planning Division, Water Department
Jeanne Krosch, Senior Planner, MSCP/Planning Department
Chris Zirkle, Assistant Deputy Director, Land Development Review Division, Development Services Department

Comment Letter H

March 28, 2005

Ms. Kristin Blackson
County of San Diego
Department of Land Use and Planning
52012 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: Salvation Army Divisional Camp and Retreat Draft EIR - Sch. No. 2000031058

Dear Ms. Blackson,

Thank you for the opportunity to review the proposed Draft EIR for the Salvation Army Divisional Camp and Retreat located at 14488 Mussey Grade Road in Ramona. The City of Poway's Development Service Department has reviewed the document and offers the following comments:

- The project is located adjacent to the City of Poway's Mitigation Area of our Subarea Habitat Conservation Plan. Of particular concern is the camps proximity to the Iron Mountain Cornerstone Open. This area is zoned Open Space-Resource Management to ensure its permanent preservation as open space. The area also serves as a major wildlife corridor. Due to the significant increase in the scope of the project, beyond its existing condition, the City is concerned with the potential increased fire risk and the associated edge effects on the preserve. **H1**
- The project is located within a rural area with few public utilities and narrow roads. The proposed project is not within keeping with the rural scale of the community and limited infrastructure. The reduced project alternative would minimize the potential biological impacts and would be consistent with the site's rural character. **H2**

Sincerely,

Jim Lyon

Senior Planner
City of Poway

RESPONSE TO COMMENT LETTER FROM THE CITY OF POWAY, DATED MARCH 28, 2005

Response to Comment H1:

Edge Effects:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources. Please see RDEIR response to comment IB17.

Increased Fire Risk:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials. Please see RDEIR responses to comments H23 and H24.

Response to Comment H2:
The County agrees with the comment in that the setting of the project area is rural and that implementation of one of the reduced project alternatives would minimize potential impacts to biological resources and would also be consistent with the site's rural character. This conclusion is consistent with the findings of the EIR. The Final EIR clarifies that because there are alternatives to the Applicant's Preferred Project that can avoid these unmitigated impacts, Reduced Project Alternative I is the project that will be presented to the decision makers for consideration.

Comment Letter I

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March 28, 2005

San Diego County
Department of Planning and Land Use
5201 Ruffin Road
San Diego, CA 92123
Attn: Dr. Glenn Russell

Re: Salvation Army Divisional Camp and Retreat
P70-379W² Log No. 98-14-023 SCH No. 2000031058

Dear Dr. Russell and DPLU Staff:

This law firm has been retained by the McGuire Family Trust dated April 17, 1985 ("McGuire Family"), owners of approximately 300 acres of predominantly unimproved real property (the "Neighboring Property") adjacent to, and immediately east of the project site. This letter sets forth the McGuire Family's comments to the Draft Environmental Impact Report dated February 2005 (the "Draft EIR"). **I1**

History of Project Site & Use

According to the Draft EIR, the existing Salvation Army Divisional Camp and Retreat ("Project Site") was purchased by the Salvation Army ("Project Proponent") in 1997, subject to a decades-old major use permit. Since 1997, the Project Proponent has operated the Project Site under the existing major use permit for the following uses[1]: **I2**

- youth camp (typical population of 115 youth, 50 staff); 2 months, **summer only**
- adult retreat (typical population of 85 adults, 5 staff); 10 months, **off-season**

The Draft EIR does not provide historic information regarding the intensity of the foregoing uses on an annual basis, nor how these uses may change based upon the proposed plan. For example, at capacity, summer camp historically appears to yield approximately **9,000** visits per year (165 youth/staff x 7 days x 8 weeks), while the adult retreat historically yields far fewer visits per year. For example, in 2001, according to the Draft EIR a total of 29 outside

[1] EIR Chapter 1-15.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005

Response to Comment I1:
Comment noted.

Response to Comment I2:
The County does not concur with this comment. The Final EIR Section 1.4.2, Existing Operational Characteristics, describes the existing level and types of use of the project site including the typical number of campers and retreat visitors. The Final EIR appropriately describes the existing operations and environmental conditions of the property. The existing conditions adequately describe the baseline for evaluating the potential environmental impacts associated with implementation of the proposed project.

The Final EIR sufficiently describes the proposed project characteristics including, future operation, maximum capacity and a site plan with the location of each facility. Final EIR Section 1.1.1 describes each component of the proposed project, including proposed use, square footage, and maximum capacity. Under the Applicant's Preferred Project as evaluated in the February 2005 Draft EIR, the maximum capacity of the project site would be 748 people; however, the typical operating scenario is estimated to be 200-250 persons on the site. The 748 people scenario was analyzed as a worst-case for CEQA purposes. However, the Final EIR clarifies that because there are alternatives to the Applicant's Preferred Project that can avoid unmitigated biological impacts, Reduced Project Alternative I is the project that will be presented to the decision makers for consideration. The maximum camp occupancy under Reduced Project Alternative I is 615. Please see DEIR response to comment I6.

The comment makes an incorrect assertion that the applicant's primary purpose is to continue to operate the facility as a summer camp for underprivileged youth. The proposed project is intended for a variety of purposes and is intended to serve a wide variety of people of all ages and socioeconomic status. The Final EIR Section 1.2 Project Objectives clearly states that the project objectives include expanding the camp to increase rental income and to provide retreat opportunities for other organizations in the area.

organizations utilized the Project Site for adult retreats. Assuming that the 29 adult retreats were held over a weekend, then in 2001 the adult retreat yielded approximately **5,000** visits (90 adults/staff x 2 days x 29 weekends). Therefore, on an historic basis, it can be extrapolated that "camp" use is nearly **double** "retreat" use. **I2 (cont'd)**

It should not be the public's obligation to extrapolate data regarding past and future uses of the Project Site. The Draft EIR should specifically set forth the annual population of youth versus adults visiting the Project Site from 1997 to present. This data must be available to allow for a comparison of existing and future uses of the facility, to ensure that the Project Proponent's "primary purpose" is to continue to operate the facility as a summer camp for underprivileged youth.

Existing Facilities

The Draft EIR provides inadequate information regarding existing facilities on the Project Site (e.g., number of buildings, size and use). The Draft EIR states that the Project Site generally includes a pool with restroom and showers, ranch house, cabins, retreat building (10,000 sq. ft.), remote camping location, maintenance area and 10,000 gallon water tank.[2] This type of facilities data is critical to allow the public to compare **type** of use ("camp" versus "retreat"), increased **density**, and project **alternatives** under the proposed development plan. The Draft EIR should include a table comparing existing and future improvements on the Project Site by description, size and anticipated uses (youth vs. adults). **I3**

Youth Summer Camp

The Draft EIR provides no background information regarding the Project Proponent's current youth camp program (which is believed to serve **3 counties** in addition to San Diego County), and why the Project Site is inadequate. The following are examples of unsubstantiated claims in the Draft EIR[3] regarding inadequacies of the Project Site: **I4**

Many children are turned away each year due to limitations of the existing program and facilities. How many children are currently turned away each year from the summer camp program? How many children are turned away due to limitations of the existing program? How many children are turned away due to limitations of the facilities? Does the summer camp currently accommodate children from other counties (San Bernardino, Riverside and Imperial)? If so, how many children attending the summer camp are residents of San Diego County versus other counties? With regard to children residing in San Diego County who are turned away (if any), can the needs of these children be accommodated elsewhere (other existing camps)?

[2] EIR Summary 1, and Chapter 1-4.
[3] Chapter 1-12.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I3:
The County does not concur with this comment. The descriptions of each alternative and corresponding use capacity are readily available in the EIR. The Final EIR Section 1.4.1 includes an inventory of the existing facilities within the project site. Figure 1-16 illustrates the location of each existing facility. Final EIR Section 1.4.2 identifies the existing number of retreat users as 90 people and existing number of camp users as 165 people. Final EIR Section 1.1.1 identifies the maximum retreat and camp capacities. As stated on EIR pages 1-6 and 1-7, "Regardless of camp composition as Salvation Army users, other organizations, or a mix thereof, maximum capacity of the camp will be 748 persons. The maximum capacity has been calculated based on building capacity and tent accommodations and includes users, staff, and support personnel." Implementation of the Reduced Project Alternative I would result in a reduction in 31 retreat users, 90 camp users, and 12 staff members for a total project capacity of 615 users (Final EIR Section 4.3.1). Implementation of the Reduced Project Alternative II would result in a reduction of 157 retreat users, 66 camp users, and 12 staff members for a total project capacity of 513 users (Final EIR Section 4.4.1). Please also see RDEIR response to comment H5.

Response to Comment I4:
The County does not concur with this comment. While CEQA requires that an EIR identify the objectives of the proposed project (CEQA Guideline §15124(b)), CEQA does not require that an EIR explain or substantiate the need for a project. Therefore, there is no need to answer the questions listed in the comment. As required by CEQA Guideline §15124 (b), EIR Section 1.2 includes a list of project objectives, which include the underlying purpose of the project.

San Diego County Department
of Planning and Land Use
March 28, 2005
Page 3

There are several significant shortcomings, including a dining hall that is too small, insufficient indoor space, and bunkhouses sleep only 25% of intended campers and visitors. If the current dining hall is too small to serve the summer camp, is it necessary to **quadruple** its size? If 10,000 sq. ft. of indoor space is insufficient, is it necessary to build **10 times** as much indoor space? Who determined the level of summer camp demand that requires a concurrent 748-use facility? What empirical findings support a nearly **five-fold** population increase? **I4 (cont'd)**

Without a retreat component of the project, there will be a loss of revenue to underwrite the expense of the youth camp. Are retreat revenues critical to sustaining the camp? Will the summer camp fail without the retreat component of the project? How many youth will be turned away each year without retreat revenues? Is the Project Proponent able to fund the summer camp without retreat revenues? Are the "camp" and "retreat" functions economically co-dependent?

In summary, the Draft EIR is void of adequate information and analysis regarding (i) the inadequacy of the camp facilities on a stand-alone basis, (ii) the inability of the Project Proponent to fund operations of the summer camp absent the adult retreat center, (iii) the need for a nearly five-fold population expansion, and (iv) the inability of the Project Proponent to fund expansion of the camp facilities absent the adult retreat center. The Draft EIR must provide answers to the foregoing questions, and supply adequate back-up documentation.

Adult Retreat Center

The Draft EIR does not provide the public with adequate information regarding the anticipated mix of users (youth versus adults) and related impacts under the all-age, year-round, multi-purpose complex proposed for the Project Site. According to the Draft EIR, at capacity the Project Site will be populated by approximately **748 users**, but it never discloses the expected **composition** of the 748 users among youth, young adults, adults and seniors. The Draft EIR provides no expectation that the Project Site will continue to be used primarily as a summer camp for underprivileged youth. The Draft EIR also provides no expectation that there will be adequate supervision of youth as the Project Site population explodes to 748 users. In fact, just the opposite appears to be the case. It appears that the Project Site will become primarily an adult retreat center; and that there will be inadequate supervision of summer camp youth. By way of illustration, the Draft EIR indicates that historically 50 staff members are present to supervise 115 youth at summer camp, a youth:staff ratio of 2.3:1. Yet, the proposed project only accommodates 55 staff members for up to 748 users, including 523 youth (according to Appendix E) resulting in a youth:staff ratio of approximately 13:1. If the Appendix E is correct, the Project Proponent has planned for an **80% reduction in staff** during the summer camp season. **I5**

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I5:
The County does not concur with this comment. As discussed in DEIR responses to comments I2 and I3, Final EIR Section 1.1.1 includes the maximum capacities for the components of Applicant's Preferred Project, and Final EIR Sections 4.3.1 and 4.4.1 describe the maximum capacities for the Reduced Project Alternative I and II, respectively. The reduction in the number of users for each project component is stated.

The Final EIR adequately analyzes the potential environmental impacts associated with the worst-case, maximum capacity of the site (i.e., 748 users), regardless of the composition of the visitors (Salvation Army users, other organizations, or mix thereof). The maximum capacity of 748 users is composed of 523 youth campers, 175 retreat center guests, and 50 staff (see Final EIR pages 1-1 through 1-3). The change in the number of adults who would supervise the youth campers is not a significant environmental issue to which a response is required.

Traffic analysis assumptions (possibly manipulated to reduce average daily traffic counts) are in direct contradiction with common sense. In reality, the **57,000 sq. ft. adult retreat center**, with 175 adult beds, will be the new focal point for the project. The adult retreat center has every likelihood to **skew the use** of the project **away from serving underprivileged youth.** By way of illustration, according to the Draft EIR, the proposed project will include state-of-the-art meeting facilities, and 752 beds in the following locations: I6

No. of Beds	Description
234	Cabins
198	Education Camp
175	Retreat Center
90	Tent Camp
55	Staff Housing
Total: 752	

The upgraded adult accommodations, as well as year-round operations (rather than non-summer months only), will likely substantially increase bookings of the Project Site by **outside organizations**, turning the facility into a **commercial enterprise**. Assuming that: (i) the project operates at its capacity of 748 users, (ii) youth and adult population are 523:175 during summer season, and (iii) outside groups use 80% (35 of 44 weeks) of off-season weekends; then the project will yield approximately **29,000 youth** visits per year [523 x 7 days x 8 weeks], and **62,000 adult** visits per year [175 x 7 days x 8 weeks + 748 x 2 days x 35 weekends]. According to the foregoing estimates, annual adult visits to the facility will increase from 5,000 to 62,000 or by more than 1,000% per year. Under the proposed plan, it appears that **adult visits** still substantially outweigh **youth visits** to the facility, thereby changing forever the character of the former summer camp.

Once again, it is imperative that the Draft EIR specifically set forth the anticipated youth and adult populations expected to visit the Project Site. The public has the right to evaluate whether the adult retreat uses are appropriate under the modified MUP, and whether the "primary use" of the Project Site to provide **one-week summer camp experiences for underprivileged youth** will become subordinate to the commercial enterprise of renting out the camp for adult retreats and conventions.

"Commercial" Enterprises are Prohibited

The Draft EIR identifies as a problem that children fill the summer camps to capacity during summer months. In fact, however, filing the camp with underprivileged youth is precisely the goal of P70-379 and P70-379W (the "MUP"). Therefore, the Project Proponent's I7

RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I6:
The County does not concur with this comment. Please see DEIR responses to comments I2 through I5 regarding the maximum capacity for each facility and project components. The assertion that the project site would be utilized year-round as a commercial facility is unfounded. The proposed project would be owned and operated by the Salvation Army, a charitable, non-profit organization, and the project is not a for-profit, commercial venture. The project site is not zoned for commercial uses, and is tax exempt; therefore, the County would not receive tax revenues from the project which would otherwise occur if the project was a taxable commercial venture. Moreover, a commercial use of the site would not be permitted under the MUP, which would allow only the maximum number of users associated with the project alternative for which the MUP is issued. Under the Applicant's Preferred Project, the maximum capacity of the site is 748. The Salvation Army indicates that the typical number of campers on a weekly basis will be more in the order of 200-250, with the maximum capacity only being reached on an occasional basis for special events. Under Reduced Project Alternative I, approximately 577 weekly campers (which includes 402 youth campers and 175 retreat guests) could utilize the facility on a weekly basis; therefore, approximately 30,004 campers (not including staff) could attend the camp on annual basis. The maximum capacity at any one time is the key number in determining the potential impacts of the proposed project, not the overall number of campers and adult guests that may utilize the camp over the course of a year.

Response to Comment I7:
The County does not concur with this comment. Final EIR Sections S.1 and 1.2 describe several deficiencies in existing facilities. A lack of capacity is clearly defined as a current problem for the Salvation Army. As previously noted, the Final EIR identifies the maximum site capacity under the preferred project as 748 users, regardless of the composition of the users (Final EIR Section 1.1.1.1). (The maximum occupancy under Reduced Project Alternative I is 615). This maximum capacity (748 persons) forms the basis of analysis for each potential environmental impact. As such, the composition of the users is irrelevant.

As stated in DEIR response to comment I6, the proposed project would be owned and operated by the Salvation Army, a charitable, non-profit organization and the project is not run for-profit. The camp and retreat center is an existing use that has been operating for over 30 years under an existing Major Use Permit approved by the County. The proposed expansion of the camp is also an allowed use with approval of a Major Use Permit Modification.

first alleged problem is not actually a problem for purposes of land use planning. The Draft EIR further identifies as a problem that the Project Proponent cannot rent the facility to outside organizations during summer months, thereby requiring that the facility be substantially expanded to concurrently accommodate the youth camp and adult retreats. Similarly, the Project Proponent's second alleged problem is not actually a problem because the operation of a year-round "commercial enterprise" on the Project Site is in contradiction to historic uses and rights granted under the MUP. I7 (cont'd)

The Draft EIR is wholly inadequate without proper analysis of this "commercial enterprise" to be conducted on the Project Site, and whether such commercial uses are permissible under the MUP. How often does the Project Proponent anticipate renting out the expanded facility? Are summer session and off-season rentals primarily to accommodate "adult" users (retreats, meetings, conferences, etc.)? What proportion of "adult" uses will be reserved for local Salvation Army groups versus outside organizations? What is the anticipated "adult" population during the summer season, and during the off-season? The Draft EIR needs to address these questions, and provide necessary background information.

Traffic Considerations

Several assumptions made by Linscott, Law & Greenspan ("Traffic Consultant") in its Traffic Impact Analysis (Appendix E) defy logic and common sense. For example, the Traffic Consultant assumes a **maximum retreat capacity of 175 users** following build-out of the project. In other words, the Traffic Consultant assumes that at all times (other than summer months) the total capacity of 748 users will remain 75% underutilized, and Table 2, Appendix E completely ignores potential use of the site for special events. The Traffic Consultant provides no basis for its assumption, nor any operating guidelines to suggest that the Project Proponent intends to abide by its assumption. In brief, the entire traffic analysis is fatally flawed by this unsupported and patently false assumption. I8 Also for example, the Traffic Consultant assumes that **20% of adults will drive to the retreat alone** (40% will van pool, and 20% will car pool). I9 No findings were presented to support this assumption, and no statistics were provided with respect to vehicle occupancy rates at other adult retreats. Using the Traffic Consultant's assumptions, the 748-user capacity facility visitor parking (excluding staff) will only require 75 parking stalls (175 x 20% + 175 x 40% divided by 2). I10 Not even the Project Proponent appears to put much faith in the Traffic Consultant's analysis, since 300 parking stalls are planned for the project. Finally, the Draft EIR provides that as a condition to project approval, the Project Proponent will include in its **rental contract** for the faculty a **recommendation to use buses, vans and carpools**. I11 This recommendation is a completely unenforceable mitigation measure, and thereupon should be disregarded. Traffic remains a significant problem in the vicinity of the Project Site, and it cannot be ignored by offering up flawed assumptions, and unenforceable mitigation measures.

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I7: (cont'd.)
As stated in the Final EIR (page 1-4), the retreat component of the camp will be available for Salvation Army groups or rental to other compatible groups throughout the year. It is anticipated that the past renters listed in Section 1.4 will continue to rent the new facility and that other similar users will also use the facility. Final EIR pages 1-14 and 1-15 describe and list the organizations that rented the camp in 2001. These organizations include, but are not limited to, churches, colleges and universities, service organizations, etc.

Response to Comment I8:
The County does not concur with this comment. The Traffic Impact Assessment (TIA) evaluates potential intersection, roadway and highway impacts based on the 748 maximum site capacity. The maximum retreat center capacity under the Applicant's Preferred Project is 175 users (Final EIR Section 1.1.1). The TIA includes a worst-case analysis of the traffic impacts assuming 100 percent utilization (i.e., 748 users) of the site. This worst-case analysis also addresses the potential attendance for special events, which would not exceed the trips generated by the 748 user, maximum capacity scenario. The Major Use Permit conditions are based on site occupancy under Reduced Project Alternative I (615 persons). In order to minimize any disturbances to the surrounding residential property owners during a temporary special event, the project would be conditioned to limit the special events to four per year. The exact number of attendees will vary widely depending on the event; however, the maximum number would not exceed 615 persons. Special events would occur only on weekends, which are non-peak traffic times. Visitors shall be encouraged to carpool or vanpool or to arrive by camp provided buses.

No significant, project-level traffic impact has been identified associated with the Applicant's Preferred Project (748 users). Additionally, no significant project-level traffic impact would be associated with Reduced Project Alternative I, which would allow a maximum of 615 users (133 fewer users than the Applicant's Preferred Project).

Response to Comment I9:
The County does not concur with this comment. The Vehicle Occupancy Ratios (VOR) provided in the TIA are based on past experience for camping and retreat events at the site. Based on these events, the Salvation Army estimates that 40% of retreat guests arrive by van, 40% by carpool, and 20% are single occupancy. These ratios were substantiated by data obtained from the Oakbridge Camp located a few miles from the project site (TIA, page 10).

RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I10:
The County does not concur with this comment. Section 10 of the TIA describes the parking demand associated with the maximum capacity for the retreat center as well as the overall parking demand for the entire project site at maximum occupancy. The parking demand is calculated based upon the substantiated VOR percentages. The VOR accounts for multiple occupants in vehicles (i.e., carpools, vanpools, busses). The parking demand for the retreat center is calculated to be 105 spaces. The total parking demand for maximum site occupancy (which assumes a special event with a maximum 748 guests), including all proposed facilities, is 320 parking spaces. As described in the EIR and illustrated in the site plan (Final EIR Figure 1-4), 336 parking spaces would be distributed throughout the property. These spaces would comprise 188 designated spaces and 112 overflow spaces. Because the overflow parking will be provided as open fields, and spaces were calculated using acreage required for parking lots, i.e., including lanes, etc. the shortfall of 20 spaces would be accommodated in the existing parking area with a valet-type arrangement that maximized the parking yield from the designated area of approximately 2.05 acres.

Additionally, as explained in the Introduction of the Final EIR, Reduced Project Alternative I is the alternative being presented for consideration of approval by the decision makers. The maximum camp capacity under Reduced Project Alternative I is 615, which will reduce the overall parking demand; however, the same amount of parking would be provided (300 parking spaces).

Response to Comment I11:
The County does not concur with this comment. There is no reason to believe that traffic analysis, including the VOR assumptions (use of vanpools and carpools), is incorrect. Please also see DEIR response to comment I9. The condition of project approval that would require the rental contract for the facility to include a recommendation to use buses, vans and carpools is an enforceable condition in the Major Use Permit. The County would enforce this MUP condition by reviewing a copy of the rental contract. Furthermore, as stated on page 6-21 of the Final EIR, the project would be conditioned to maintain a vehicle log book to record the number of trips to and from the camp and retreat, all arrival/departure times and the type of vehicle (car, van, bus, etc.). The log book will be available upon request to DPLU. The on-site vehicle log would be used to compare the actual project operations with the specific counts outlined in the TIA.

Wastewater Treatment

The Draft EIR states that the Project Site is currently served by seven (7) leach fields, but it fails to indicate the current levels of wastewater discharge, the size and capacity of the existing leach fields, and whether the existing systems can support the increased volume from the proposed project. The Draft EIR further states that an additional 12 acres of leach fields will be required to dispose of 75,000 gallons of wastewater per day during peak season, and that a **100% reserve area** will be provided on-site. There is no data to support the amount of wastewater likely to be produced by the proposed project, or whether existing soil conditions and 12 acres of leach fields is sufficient to accommodate actual wastewater discharge. The summary treatment of wastewater disposal considerations fails to meet the standard of adequate disclosure, and on its face the project plan fails to satisfy the County's requirement for a **300% reserve area** for all leach fields. I12

Project Alternatives

The courts and CEQA Guidelines require that each EIR present a "range of reasonable alternatives" and that each EIR include sufficient information about each alternative "to allow meaningful evaluation, analysis and comparison with the proposed project." *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal. 3d 553, 566 (1990); *Residents Ad Hoc Stadium Comm. v. Board of Trustees*, 89 Cal.App. 3d 274, 287-88 (1979); Guidelines § 15126.6(c)(d). The range of alternatives must be sufficient "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." *San Bernardino Valley Audubon Soc'y v. County of San Bernardino*, Cal.App. 3d 738, 750-51 (1984); Guidelines §§ 15126.6(c)(f). Additionally, one of the alternatives studied must be the "no project" alternative. Guidelines § 15126.6(e). The no-project analysis should discuss existing conditions as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans, and consistent with available infrastructure and community services. Guidelines § 15126.6(e). In consideration of the foregoing, the Draft EIR should present the following project alternatives, with sufficient analysis to permit a comparison of these alternatives with the proposed project: I13

- Limit development to MUP 90-379 & MUP 90-379W (kitchen + youth bldg).
- Improve summer camp facilities only; no new adult retreat center.
- Improve summer camp facilities, plus minor add-on to existing retreat center. I14

Additionally, the current "alternatives" analysis should identify the Project Proponent's schedule for completion of the 20-year expansion of the Project Site. What percentage of the total build-out will occur over 5, 10, 15 and 20 years?

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I12:
The County does not concur with this comment. The septic system has been sized to accommodate a maximum of 748 persons. The County Department of Environmental Health (DEH) has reviewed the septic system engineering for the project. The proposed septic system engineering includes the safety factors required for this use. The septic system would require a permit from DEH and would have to comply with applicable water quality regulations of the RWQCB. In a letter dated April 10, 2003, DEH stated it has "no objection to approval of the Major Use Permit modification" and has attached conditions for project approval. Furthermore, the letter states that DEH "has reviewed onsite wastewater system designs for a reduced version of the project. The reduced version has no impact on previously designed and approved onsite wastewater systems." The letter also states the basis for the recommendation was percolation testing, groundwater separation studies, soil character assessment and a nitrate discussion provided by Vinje and Middleton Engineering, Inc. (January 2003). In 2009, the DEH approved the septic plan (see letter dated December 21, 2009) and stated that DEH has "no objection to approval of the Major Use Permit Modification." The updated Vinje and Middleton Engineering, Inc. report (December 18, 2009) is provided as Appendix K to the Final EIR. As required by County Code section 68.341, a 100 percent reserve or expansion area (not 300% as asserted by the comment) is provided on-site.

Response to Comment I13:
The County does not concur with this comment. The County disagrees that the EIR does not present a "reasonable range of project alternatives". Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Further, section 15126(d)(5) states that "the range of alternatives in an EIR is governed by the 'rule of reason' and only requires the EIR to set forth those alternatives necessary to permit a reasoned choice."

The alternatives discussed in the EIR constitute a range of reasonable alternatives. Reduced Project Alternative I would: relocate the retreat center to avoid significant biological impacts; decrease the size of the retreat center by one 16-unit cabin; eliminate the retreat center gatehouse, the tent component, a restroom/shower building, outdoor seating and an outdoor presentation area. Reduced Project Alternative I would reduce the capacity of the camp by 133 users and decrease the

RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I13: (cont'd.)
total project building footprint by 11,150 square feet. Compared to Reduced Project Alternative I, Reduced Project Alternative II would eliminate one cabin from the retreat center component and would eliminate three cabins from the education camp component for a reduction of 11,346 square feet of buildings and 102 persons who would attend the camp. The substantial reduction in the building square footage and the number of persons provides a reasoned choice for the decision makers. Please refer to Table 4-1 for a break down of project alternatives impact comparison.

The Final EIR addressed the first alternative suggested in the comment (first bullet). "The No Project Alternative" is addressed in the EIR (see EIR pages 4-3 through 4-5). This alternative assumes buildout of the Divisional Camp and Retreat as currently allowed under the existing Major Use Permits which includes a 7,000 square foot dining hall and kitchen and a youth activities building.

The alternatives analyzed in the Final EIR constitute a reasonable range of alternatives as required by CEQA as explained above. An EIR is not required to analyze all alternatives suggested in public comments.

Response to Comment I14:
The County does not concur with this comment. There is no requirement for the alternatives analysis to include a schedule for completing the proposed 20-year expansion project. The comment does not explain why a description of construction phasing is necessary for an adequate alternatives analysis. The EIR evaluates the entire buildout of the camp, the worst-case scenario, pursuant to the proposed 20-year Master Plan. The Final EIR page 1-1 states, "At the end of the 20-year expansion, the camp will accommodate up to a maximum capacity of 748 people (i.e., users, staff and other support personnel)." The alternatives evaluation is based on total buildout of the alternatives (i.e., maximum occupancy and worst-case scenario), and no phasing of buildout is identified for the proposed project and the alternatives evaluated in the EIR.

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Analysis of "No Project" Alternative

From an environmental standpoint, the Draft EIR concludes that **significant and immitigable Biological Resources and Land/Use Planning impacts would not occur** with implementation of the "no project" alternative. Additionally, even under the "no project" alternative, the Project Proponent could make substantial improvements to the summer camp under the MUP. Specifically, the County has already approved the construction of a new 7,000 sq. ft. kitchen/dining hall, and the construction of a new youth activities building (unknown size). As a result, the Project Proponent is already vested with necessary entitlements to substantially improve the summer camp facility. It should be abundantly clear that improving the summer camp is not the Project Proponent's objective because the funding and entitlements for these improvements have been in place for several years. **The Project Proponent wants a year-round adult retreat center to be operated as a commercial enterprise in order to supplement its annual fundraising activities.** A proper alternatives analysis should include the ongoing operation and enhancement of the summer camp originally contemplated by the MUP, absent the commercial enterprise of a massive, concurrent-use adult retreat center. The Project Proponent should not be entitled to reject the "no project" alternative. I15

Analysis of Project Alternatives I and II

In keeping with the Project Proponent's undisclosed effort to effectuate a **change in use** of the Project Site to a year-round commercial enterprise, in both Project Alternative I and Project Alternative II the Project Proponent has elected to save the **adult retreat** center at the expense of the **summer camp** facilities. I16

- In Project Alternative I, a total of 121campers, 12 staff and 11,150 sq. ft. of youth space are sacrificed, while not one bed or one stone of the 57,000 sq. ft. adult retreat center is lost.
- In Project Alternative II, a total of 223 campers, 12 staff and 39,900 sq. ft. of youth space are sacrificed, while not one bed or one stone of the 57,000 sq. ft. adult retreat center is lost.

With regard to both Project Alternatives I and II, the Project Proponent rejected these alternatives because the adult retreat center would have to be "relocated to the south of its location under the proposed project, nearer to the other camp facilities." No explanation is given for the reason behind relocation of the adult retreat center. Why must the adult retreat center be relocated? Why to an undesirable location, when more favorable locations are available? Can the adult retreat center be reduced in size, or shielded from the remainder of the camp facilities? The Draft EIR needs further rationale and analysis of Project Alternatives I and II in regard to

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I15:
The County does not concur with this comment. The alternatives analysis includes the No Project Alternative (see EIR pages 4-3 through 4-5). This alternative assumes buildout of the Divisional Camp and Retreat as currently allowed under the existing Major Use Permits which includes a 7,000 square foot dining hall and kitchen and a youth activities building.

The EIR states that the No Project Alternative would not achieve the basic objective of the applicant, which is to significantly improve, upgrade, and provide for more capacity at the existing Salvation Army Divisional Camp and Retreat in order to serve the community and youth of San Diego (Final EIR pages 4-3 and 4-4). The construction of a new 7,000 square foot dining hall and new youth activities building as allowed by the existing MUP would not achieve the basic objective of the project (Section 4.2.3, page 4-5). Pursuant to CEQA Guideline §15126.6(c), alternatives can be rejected based on their inability to achieve the basic objectives of the project.

Furthermore, although the project applicant has "rejected" the No Project Alternative, the decision maker has not yet decided whether to approve or reject this alternative.

Response to Comment I16:
The County does not concur with this comment. The relocation of the retreat is necessary to eliminate the project's conflicts with the Biological Mitigation Ordinance (BMO) and the Resource Protection Ordinance (RPO). Under Reduced Project Alternatives I and II, some of the proposed youth camping areas would be eliminated to accommodate the relocation of the retreat center. The comment does not explain why the location of the retreat center under the Reduced Project Alternatives is an "undesirable location." The proposed location under each alternative does not contain sensitive resources and reduces significant and unmitigated biological impacts associated with the location of the retreat center under the Applicant's Preferred Project. As noted in the Introduction to the Final EIR, Reduced Project Alternative I will be considered for approval.

relocation of the adult retreat center, as the basis for Project Proponent's rejection of these alternatives. I16 (cont'd)

Adverse Impacts to the Environment

In regard to Table S-1 (Summary of Significant Impacts and Mitigation Measures), it is obvious that the Project Proponent seeks a "waiver" of the following significant impacts, since no mitigation measures are proposed: I17

Impact 2.2(l) – wetland impacts in BRCAs

Impact 2.2(m) – scrub impacts in BRCAs

Impact 2.2(o) – sensitive habitats (corridor)

Impact 2.2(p) – sensitive habitats (wetlands)

Impact 2.7(a) – sensitive biological habitat

There is no basis for the County to provide waivers with regard to the foregoing significant impacts, and none should be granted under the circumstances.

In addition to the items referenced above, the Draft EIR fails to adequately address the following risks to visitors of the Project Site, and adverse environmental impacts to the areas surrounding the Project Site:

- **Use of open flames** – The Project Site and surrounding areas are routinely subject to an "extreme" fire threat, particularly during summer months. The youth attending the summer camp, and all other visitors to the Project Site during period of significant fire danger, should not be permitted to have campfires with open flames at the remote camping site (away from fire suppression services). I18

- **Effect of leach fields** – There is no analysis regarding the extensive production of wastewater from the project, the sufficiency of planned leach fields to accommodate the wastewater, the effect upon nearby tributaries and San Vicente reservoir, the impact of wastewater and grading upon Englemann Oaks on the Project Site and the Neighboring Property, and the effect of wastewater and construction activities (including storm water run-off) on the existing well and purity of well-water serving the Neighboring Property. There is also no program proposed to monitor these impacts over time. I19

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I17:
The County does not concur with this comment. Mitigation measures are proposed to reduce all of the potential biological impacts identified in the EIR to the extent feasible. However, because the project as proposed under the Applicant's Preferred Project would not conform to existing County regulations with respect to certain biological impacts (i.e., conflicts with the BMO and RPO), significant unavoidable impacts have been identified. Therefore, alternatives to the proposed project have been evaluated that are capable of avoiding or lessening the significant impacts associated with the proposed project. Because the Applicant's Preferred Project does not comply with County ordinances, it cannot be approved. The County is not providing a "waiver" for the significant unavoidable impacts of the Applicant's Preferred Alternative. Reduced Project Alternatives I and II would achieve most of the basic objectives and reduce the significant unavoidable impacts of the Applicant's Preferred Project to a level less than significant. As noted in the Introduction to the Final EIR, Reduced Project Alternative I will be considered for approval.

Response to Comment I18:
The County concurs with this comment. The existing camp does not allow campfires. This would continue under the proposed project.

Response to Comment I19:
The County does not concur with this comment. A wastewater analysis was prepared for the proposed project to determine the appropriate size and location of the proposed septic system and leach fields. As indicated in the Final EIR (see page 6-3), additional sewage service required as a result of the proposed project will be accommodated with an expanded, standard on-site septic tank and leach field system. The leach fields have been adequately sized to accommodate the proposed project. The County Department of Environmental Heath (DEH) reviewed the proposed septic system as described in the Vinje and Middleton Engineering report and determined that the proposed septic and leach field system will meet project waste disposal requirements (please see the DEH correspondence dated April 10, 2003 attached to the response to comments). In 2009, the DEH approved the septic plan (see letter dated December 21, 2009) and stated that DEH has "no objection to approval of the Major Use Permit Modification." The updated Vinje and Middleton Engineering, Inc. report (December 18, 2009) is provided as Appendix K to the Final EIR. The project applicant must obtain a permit from DEH for the proposed septic system. DEH will ensure that the proposed septic system complies with all County septic system requirements. DEH operates under the authority of the State Regional Water Quality

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Response to Comment I19: (cont'd.)
Control Board. The state and local requirements mandate a five-foot separation between water bodies (groundwater and surface water) in locating the placement of leach fields, which has proven to preclude any potential water quality impacts. During the septic system permit process, DEH staff will inspect the installation to ensure that the septic system is adequately sized and properly installed. Because the project would comply with State and County requirements, as required by DEH, the impact to groundwater quality is not anticipated to be significant.

Furthermore, EIR Section 6.1.3.1 and the *Storm Water Management and Maintenance Plan (SWMP) for Salvation Army Divisional Camp and Retreat Center* (Fuscoe Engineering, 2003, updated 2009) provided in EIR Appendix G address site drainage and runoff impacts of the proposed project. Each of these documents recognizes that the project site includes several drainages, including two blue line streams that generally trend west to east and either discharge directly into or are otherwise hydrologically connected to the west branch of the San Vicente Creek, which flows into the San Vicente Reservoir. The BMPs identified in the EIR and SWMP would reduce the potential water quality impact to these surface waters to a level less than significant.

The potential impact of the leach fields on on-site and off-site Englemann Oaks has been analyzed. The existing and proposed leach lines and leach fields are included in the proposed site plan's limits of disturbance (Final EIR Figure 1-4). Therefore, the limits of disturbance associated with the construction of the leach fields is included in the development footprint assumed for the project for purposes of evaluating potential impacts related to Biological Resources (Chapter 2.2). The Final EIR Figure 1-13 identifies the areas currently developed or proposed for development under the Applicant's Preferred Project which includes the proposed leach fields. Figure 2.2-1 Biological Resources Map identifies the biological resources on the project site, and the proposed project impact area. As shown, the leach fields are included in this assumed impact area.

- **Fire evacuation** – The proposed project is located at the "head" of a dead-end road, and the evacuation plan for the Project Site in the event of a fire or other natural disaster will affect the ability of others to exit the area. In the event of congestion or delay in evacuating the Project Site, others at the end of the road will be trapped without an adequate escape route. Additionally, there is no assurance that County services (fire, police, rescue, etc.) are sufficient, or will be allocated in a manner that affords those at the end of the road equal priority, so that all occupants of Mussy Grade Road will be adequately protected. **I20**

- **Character of project** – The proposed project is out of character with its rural surroundings. In an area which is attractive because of its low-density, open space, environmentally "friendly" uses, and mitigation set-aside land; the proposed project is intended to attract large crowds, add significant building density (undisclosed in relation to existing density), and invite environmentally intensive uses. This proposed project is not in conformity with its surroundings. **I21A**

Adverse Impacts to the Neighboring Property

The Draft EIR fails to adequately address the following adverse impacts upon the Neighboring Property, which the McGuire Family has attempted to bring to the Project Proponent's attention on numerous occasions: **I21B**

- **Boundary fence** – There is no boundary fence on the east side of the Project Site to protect the Neighboring Property from intentional or unintentional trespass.

- **Road encroachment** – The existing road serving the Project Site encroaches onto the Neighboring Property. The road encroachment should be eliminated by moving the road to the west. **I22**

- **Maintenance yard** – The maintenance yard is not visibly screened to protect views from the east. The Project Proponent should enclose the maintenance yard with a protective screen, and mature landscape to protect views. **I23**

- **Noise and light** – There is no barrier to noise and light projected onto the Neighboring Property. The Project Proponent should modify proposed uses, or install acceptable barriers to prevent noise and light from being projected onto the Neighboring Property. **I24**

- **Livestock** - The Project Proponent and its visitors should hold the McGuire Family harmless from injuries suffered upon the Neighboring Property from contact with livestock or other conditions on the Neighboring Property. **I25**

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I20:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials. Please also see RDEIR responses to comments Letter D, H15 through H42, H59 through H71 and IF1 through IF50.

Response to Comment I21A:
Please see DEIR responses to comments JCC1 through JCC22.

Response to Comment I21B:
The issue raised is not related to an environmental issue pursuant to CEQA. However, there are no existing or proposed trails that are near or lead to the adjacent private property, and camp boundaries will be marked (signage) which should discourage trespass onto the neighboring property. The closest new facility to the eastern boundary property line is the maintenance area, which will be utilized by camp employees and would not be accessible to the general camp population/visitors. The new maintenance facility area would be approximately 200 feet from the property boundary. Activity areas of the camp are located much further (distances exceeding 300 feet) from the property line, and are typically separated from the property line by dense vegetation and/or steep slopes, the combination of which would discourage camp visitors from wandering onto adjacent properties.

Response to Comment I22:
The County does not concur that the existing road serving the project site encroaches onto neighboring property and therefore no such revision is required.

Response to Comment I23:
The proposed maintenance yard is located at a topographic elevation lower than the residential area to the east. As discussed in the EIR (EIR page 2.5-3), key observation points looking onto this portion of the project site were analyzed, and it was determined that existing topography and/or vegetation intervene with the line of site to the proposed maintenance yard area; therefore, the proposed maintenance yard area would not be visible from this viewpoint. The addition of a protective screen and landscaping would not further obscure views from the adjacent property to the east.

RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I24:
The County does not concur with this comment. A detailed analysis of the proposed project's potential impacts related to noise and light effects on adjacent properties is provided in Final EIR Sections 2.4 Noise and 2.5 Aesthetics. The noise analysis included an evaluation of off-site traffic, on-site traffic, construction noise, and on-site noise associated with proposed outdoor camp activities in relation to County Noise Ordinance limits. The noise analysis concludes that the use of sound amplifying equipment and on-site air conditioners would result in a significant noise impact. However, Mitigation Measures 2.4.b and 2.4.c would reduce the noise impact to a level less than significant. These mitigation measures prohibit the use of sound amplifying equipment at any location and place limits on the Sound Rating of proposed air conditioning units at the proposed retreat center. With implementation of these measures, standards in the County Noise Ordinance would not be exceeded, and no significant impacts relating to noise would occur. Therefore, barriers as suggested by the comment would not be required.

The aesthetics analysis includes a detailed evaluation of the proposed site plan and visual simulation modeling from 13 key observation points within and surrounding the campground property. Proposed structures were computer modeled to simulate post-development conditions of the project site. Proposed lighting will comply with section 6322 et. seq. of the County Zoning Ordinance and County Code section 59.101 (Light Pollution Ordinance) (see Final EIR page 2.5-11). All outdoor lighting will be adjusted to reflect light downward away from adjoining property.

Response to Comment I25:
The comment does not raise a significant environmental issue for which a response is required. Furthermore, the comment fails to provide any legal basis for requiring the Salvation Army and camp visitors to hold the McGuire family harmless or any support for the proposition that the project would cause injuries to the McGuire's livestock or property.

- **Monitoring and enforcement** – For the benefit of the McGuire Family and others along Mussy Grade Road, the County should impose procedures for monitoring and enforcing the Project Proponent's compliance with any conditions imposed upon approval of the MUP, including a private right of action if the County does not timely pursue such monitoring and enforcement activities. I26

Thank you for your consideration of these matters. If you have any questions regarding the foregoing, please do not hesitate to contact me at (619) 515-3286.

Sincerely yours,

Jeffrey R. Stoke
Procopio Cory Hargreaves
& Savitch, LLP

JRS:srt

cc: Ms. Mary McGuire
Mr. Jeff McGuire
Mr. Mike Leach

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RESPONSE TO COMMENT LETTER FROM PROCOPIO, CORY, HARGREAVES & SAVITCH c/o MCGUIRE FAMILY TRUST, DATED MARCH 28, 2005 (CONTINUED)

Response to Comment I26:
If the County approves the proposed project, the County will also approve a Mitigation Monitoring and Reporting Program to ensure that the camp implements the mitigation measures. Mitigation measures will also be included as enforceable conditions in the Major Use Permit. If the McGuire family or any other neighbors believe that the Salvation Army is not complying with any of the MUP conditions, they may contact DPLU Code Enforcement.

Comment
Letter J

MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

P.O. Box 683
Ramona, CA 92065
(760) 787 - 0794 T
(706) 788 - 5479 F

Steering Committee:
Diane Conklin, Spokesperson
Carol Levin, Treasurer
Bruce Meador, Member
Donna Schneider, Member
Joseph Mitchell, Member

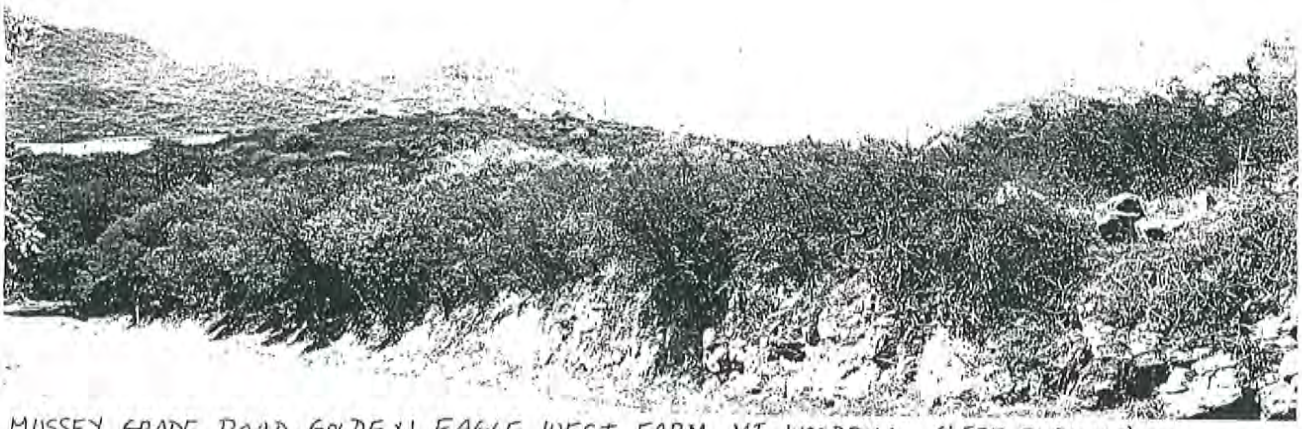
COMMENT REPORT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT OF THE SALVATION ARMY

SCH NO. 2000031058
ER98–14-023
P70-379W2

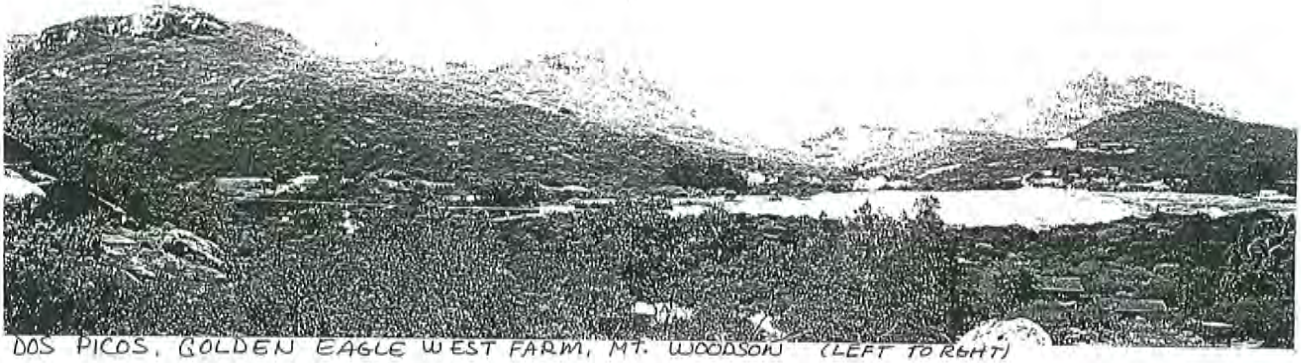
MARCH 28, 2005

MUSSEY GRADE ROAD, GOLDEN EAGLE WEST FARM, MT. WOODSON (LEFT TO RIGHT)

DOS PICOS, GOLDEN EAGLE WEST FARM, MT. WOODSON (LEFT TO RIGHT)



MUSSEY GRADE ROAD, GOLDEN EAGLE WEST FARM, MT. WOODSON (LEFT TO RIGHT)



DOS PICOS, GOLDEN EAGLE WEST FARM, MT. WOODSON (LEFT TO RIGHT)

Comments Report on the Draft Environmental Impact Report of the Salvation Army

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INTRODUCTION

By Diane Conklin

COMMENT REPORT INTRODUCTION

by Diane Conklin

Introduction: A Massive Project – The Wrong Plan for the Wrong Land

In the Draft Environmental Impact Report ("DEIR") released by the Salvation Army (hereinafter "Army") on February 10th and dated February 2005, we have the results of some seven years of effort[1] on the part of the Army to environmentally and otherwise justify inserting a massive, unprecedented and commercial project into a unique, pristine, and biologically, historically and culturally significant area, Mussey Grade Road. JI1

This historical stagecoach road, recognized by the California State Historic Preservation Office ("SHIPO") in 2003 as a Historical Point of Interest,[2] travels to a dead end through a largely undeveloped valley roughly situated between the ridges of Iron Mountain in Poway and Fieldings Crest in Ramona. The road traverses through approximately five miles of what backcountry Southern California used to overwhelmingly be, a verdant, oak filled, green valley surrounded by mountain peaks, watered by mountain streams and inhabited by indigenous plants and animals from time immemorial. The road and its environs have traditionally been recognized as a place of great beauty and serenity.[3] Its history and its people are celebrated in its own web site www.Musseygraderoad.org

The appropriate characterization of the project the Army proposes for 578 acres along Mussey Grade Road is not what the Army calls a camp and retreat. To the contrary, this project is actually a huge commercial venture in a rural, large lot, residential area made up in the main of large acreage ranches and the historic village of Fernbrook.[4] In fact, within the 2020 General Plan Update process still underway in the County of San Diego, the Mussey Grade Road area has been pegged at one dwelling unit per 10 acres along the road and one dwelling unit per 40 acres further away from the road, an acknowledgement of the area's deeply rooted rural character and the fact that only one, dead-end road, Mussey Grade Road, provides the single access into and out of the valley.[5] Obviously at these densities, and especially when mountainous unbuildable slopes are taken into consideration, the numbers proposed by the Army (748 persons in JI1A

JI1 [1] See TABLE 1-1, Project History, DEIR at page 1-39; also see a previous record of Army activity on this land in the DPLU Code Enforcement Letter, dated September 10, 1997, Notice of Violation, where various additions made by the Army after purchase of the modest camping facility from the First Presbyterian Church of San Diego on March 14, 1997, were the subject of county code enforcement action.

[2] See attached letter in Community Character Chapter in this Comment Report

[3] See, for example, articles cited in the Community Character Chapter

JI1A [4] For more information on the character of the community, see the Community Character Chapter

[5] See 2020 Map for the area

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005

Response to Comment JI1:

In general, the County does not concur with the comments provided by the Mussey Grade Road Alliance. This comment provides an overview of specific comments raised in subsequent chapters of the Mussey Grade Road Alliance's comment report – all of which are responded to in further detail in this response to comments document or as provided in the Final EIR.

JI1 Footnotes:

1. Comment noted.
2. The comments raised in the attached Community Character Chapter are addressed in responses to comments JCC1 through JCC24.
3. The comments raised in the attached Community Character Chapter are addressed in responses to comments JCC1 through JCC24.

Response to Comment JI1A:

The County of San Diego acknowledges the Mussey Grade Road Alliance's opposition to the proposed Salvation Army project, but does not concur with the comment's assertion that the project represents a "huge commercial venture." The density requirements contained within the zone box are not applicable to the project because these density requirements pertain to residential projects. Furthermore, the comment refers to densities proposed for the site under the proposed General Plan Update. Upon adoption of the General Plan Update, a separate zoning ordinance will need to be adopted, and would likely allow the same use type of the property with a MUP. Residential densities would not affect the scope of the allowed use on the site pursuant to the MUP. As such, the allowed use on the project site should not be affected by the future adoption of the General Plan Update. Please see DEIR responses to comments I6, I7, JCC2, JCC3, JCC11, JA5, and JA10.

JI1A Footnotes:

4. The comments raised in the attached Community Character Chapter are addressed in responses to comments JCC1 through JCC24.
5. The County acknowledges the proposed General Plan Update designations for the area and has considered these designations in responding to comment JI1A.

the proposed plan, 615 in proposed Alternative I, or 513 in the proposed Alternative II[6]) are completely out of whack with what could be produced by residential housing.[7]

JI1A (cont'd)

What the Army is really proposing is a conference center, which is what its sign actually says on Mussey Grade Road, announcing to visitors and passersby that this is the "Salvation Army Sierra del Mar Camp and Conference Center"[8]. The plans to enlarge this presently rather modest and appropriately sized facility is plagued by dreams of gigantism and should be recognized by the County of San Diego Department of Planning and Land Use ("DPLU"), the Planning Commission, and, the Board of Supervisors as what it truly constitutes: an attempt to fit a gorilla's foot into a glass slipper for the financial benefit of the applicant.

JI1B

The Army has tried to present this project both publicly and in this DEIR as a benefit to the immediate community and in synch with the surrounding area. Nothing could be further from the truth and as we shall show the Army's proposed project is the wrong plan for the wrong land and will not result in benefits to either Mussey Grade Road or to the town of Ramona[9]. The Army has also presented this project as a children's camp, benefiting underprivileged children, hardly an objectionable goal. But in actuality the Army plans to use the camp fulltime for children's camping only eight weeks of the year.[10] In fact, as we shall later see under Specific Problems in this section, the Army uses this eight-week period of time as its excuse to enlarge the facility from its present density by a factor of more than six,[11] claiming it loses needed revenue during this time.

JI1A [6] DEIR at 4.4.1 Reduced Project Alternative II Description and Setting, p. 4-7, reducing the "calculated capacity of the camp by 235"; only by subtracting 235 from the 748 figure given in 1.1.1 Project Description, p. 1-1, does one arrive at the 513 total. These kinds of machinations are common throughout the DEIR, where simplicity is lacking due, possibly, to the absence of profound thought.

[7] For example, assuming for the sake of argument that a generous 400 acres out of the 578 are able to be converted into buildable lots, and understanding that the majority of the Army's land is in the mountainous region of the property, not along Mussey Grade Road, causing the lots sizes under the 2020 General Plan Update to be a minimum of 40 acres, and assigning a value of even 6 persons to each housing unit, there would be a total 10 homes housing 60 persons. This means that the Army's plan results in a density more than a factor of 10 at 748-person and somewhat less than a factor of 10 at 513-person suggested density usage.

[8] See photo of sign in the Traffic Chapter of this Comment Report

[9] See Community Character Chapter discussion regarding non-benefits to the immediate community and to Ramona as a whole.

JI1B [10] Draft Specific Plan for the Proposed Salvation Army Divisional Camp and Retreat Specific Plan, SCH No. 2000031058, ER98-14023, SP00-06, P70-379W2, August 20, 2001, Received Stamp: August 21, 2001, San Diego County Department of Planning and Land Use, Existing Operational Characteristics, p. 10: "The existing Salvation Army Divisional Camp and Retreat operates year-round , with operations generally divided into two seasons: 1) on-season, which includes youth camping for eight weeks during mid-June to mid-August; and, 2) off-season, which includes Salvation Army group retreats, and private rentals for the balance of the year."

[11] The Army proposes 748 density in its plan. Even the least numerous buildout density of Alternative II, with a capacity of 513 persons, would increase the existing density by about a factor of five, based on existing Major Use Permits, attached, dated 1970, 1976 and 1998.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

JI1A Footnotes: (cont'd.)

6. The County does not concur that the EIR is lacking simplicity. The specific characteristics of the Applicant's Preferred Project and alternatives are provided in the Final EIR.
7. Please see response to comment JI1A.
8. The County concurs that the existing sign at the entrance of the existing camp states "Salvation Army Sierra del Mar Camp and Conference Center." The Final EIR clearly explains that a component of the proposed project is the expansion of the existing conference (retreat) center, and all such impacts associated with this expansion are evaluated in the Final EIR.

Response to Comment JI1B:
While the project applicant's goals include to expand camping opportunities for underprivileged youth, the applicant's goals also include to provide a retreat center that will be available for other organizations (Final EIR pages 1-12 and 1-13). Please also see response to comment I2.

JI1B Footnotes:

9. The comments raised in the attached Community Character Chapter are addressed in DEIR responses to comments JCC1 through JCC24.
10. The operational characteristics of the camp identified in this footnote are consistent with those described and analyzed in the Final EIR.
11. Comment noted.

In order to propose such an incongruous use of the land and to advance the idea of expanding the present use under the inherited Major Use Permit ("MUP") from the modest numbers presently using the facility to 748 persons, the Army needed years of effort and considerable financing, as well as a compliant county land use and legal bureaucracy. In actual fact, the Army inherited a rather limited MUP. While documents regarding the permit are vague, the total permitted usage appears to be 120-person maximum at the present time, despite the fact that the Army claims the permits allow 160-person usage in the DEIR. JI1C

The initial MUP for this land granted to the First Presbyterian Church of San Diego in the 1970s[12] never envisioned the huge increase in use seemingly required by the Army to meet its "project objectives."[13] Moreover when the land was granted a major use permit, the Mussey Grade Road area and Ramona itself were recognized as rural areas within the county, perfect for a small church camp where communing with nature was a natural usage of the land. In 1976 when the initial MUP was modified to add various elements to the church camp, one of the reasons justifying the approval stated:

> **"the fact that low intensity of the facility avoided the necessity for an urban level of services and provided ample open space in conformance with the objectives of the 'Rural Residential' and 'Mountain Development' categories of the General Plan."**

This reasoning is acknowledged by the Army in their Specific Plan.[14] In contrast, the Army, as we shall see, requires thousands of square feet of building space including an indoor theater (!) and a conference center with its five motel-like buildings, alone comprising some 57,000 estimated square feet, totaling some 130,000 estimated square feet of building space[15] along with hundreds of attendant parking spaces, in order for its child clientele and paying guests to enjoy the natural world.[16] JI1D

The result is an unfortunate project that, in its main plan as well as all alternatives excepting the no-build alternative,[17] proposes to use the land in ways unimaginable to the

JI1C [12] MUP No. 70-379, issued in December 1970

JI1C [13] DEIR, Project Objectives, p. 1-11

[14] Salvation Army Divisional Camp and Retreat Specific Plan, Aug. 20, 2001, p. 4

JI1D [15] Although this is simply the best estimate one can make. In the DEIR the Army does not chart the various Alternatives and their square footage. It is obvious that the total amount of building square feet involved in the plan is something the Army chooses to not easily disclose. The final EIR must include a chart of all Alternatives, all total square footage for each, and the number and description of all buildings.

[16] In fact the Army states in its No Project Alternative, at p. 4-4, in the DEIR, that one of the current problems is "During the peak summer months when children are on-site for camping activities, some activities would have to take place outdoors because the existing facilities have inadequate space." (Emphasis added.) In this statement, the Army unwittingly reveals the true nature of the experience it plans for children – not an outdoor camping experience but an indoor experience in fancy, new buildings, also conveniently available for rent by adults. Of course, the No Project Alternative also would reduce many of the impacts associated with the proposed project, including significant and unmitigable Biological Resources and Land Use/Planning impacts, as the DEIR notes at p. 4-3.

[17] The Army summarily rejects the No Project Alternative, pp. 4-3 – 4-4, based on its desire to fulfill its "basic objective" to "in order to serve the community and youth of San Diego, p. 4-4.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JI1C:
The County concurs that the existing MUP is limited. Because of the limitations, the applicant is required to obtain approval of a Major Use Permit Modification in order to expand the capacity of the existing camp.

JI1C Footnotes:

12. Comment noted.
13. Comment noted.

Response to Comment JI1D:
The square footage for each project component is identified in the Final EIR Section 1.1.1. Please see responses to comments I2 through I8 regarding the maximum capacity of the project and associated MUP constraints.

JI1D Footnotes:

14. The Specific Plan is no longer proposed as part of the project. The objectives of the project are clearly identified in the Final EIR.
15. The County does not concur with this comment. The EIR provides a complete description, including proposed building square footage. See Final EIR Chapter 1.0, Table 1-2.
16. The County does not concur with this comment. Many indoor activities are appropriate for camp uses. The statement in the Final EIR (page 4-5) that some activities would need to occur outdoors because the existing facilities have inadequate space, does not suggest that the proposed project would not function as a camp. The proposed Master Plan and corresponding camp uses are described in the Final EIR Section 1.0, and include both indoor and outdoor activities.
17. Comment noted. The No Project Alternative would not meet the basic objectives of the proposed project.

County of San Diego in the past and the Ramona Community Planning Group ("RCPG") today, which voted twice against the proposed project, in 1999 and again in 2001.[18] JI1D (cont'd)

The project is contrary to the rural land designations presented in the 2020 General Plan Update Map for the area, and does not respect the land which qualifies as a Biological Resource Core Area.[19] The project is in contravention of the County Biological Mitigation Ordinance ("BMO")[20], the Resources Protection Ordinance ("RPO") [21]and the county's Multiple Species Conservation Program ("MSCP") Subarea Plan.[22] Ultimately, the Army itself acknowledges that the project as proposed is fatally flawed due to the serious and non-mitigated impacts it would impose on the land.[23] JI1E

A Lopsided Review Process

It is obvious that the Army was able to extend the formation and planning on this project from its initial planning begun in May 1998 to the present time,[24] seven long years, because the Department of Planning and Land Use ("DPLU") permitted time extension after time extension thus allowing this project to crawl forward at a pace set by the Army, not the County of San Diego under the California Environmental Quality Act ("CEQA").[25] Another effect of this foot-dragging is the wearing down of the affected JI2

[18] The vote in 1999 was unanimous. See, "Local planners reject Salvation Army camp plan," by Brian Hazle, *Ramona Sentinel*, July 8, 1999, p. 1, attached The vote in 2001 cited various reasons working against the facility, including huge density, major traffic impacts, and the creation of a fire hazard. See, "RCPG nixes Salvation Army plan to expand campground," by Eric Leins, *Ramona Sentinel*, p.1, attached. See, also Ramona Community Planning Group Draft Findings Under 7358 on the Proposed Master Plan for the Salvation Army Sierra Del Mar Divisional Camp and Conference Center, dated November 9, 2000. See, also, Proposed Master Plan for the Salvation Army, Sierra Del Mar Divisional Camp and Retreat Center, attached, for comparison to the Draft Findings. JI1D

[19] See Biology Chapter in this Comment Report.

[20] See Conclusions at 2.2.5, p.2.2-23, where the DEIR states "Because of these conflicts with the BMO and RPO, impacts to biological resources are significant and unmitigated." The DEIR goes on to say that "These impacts are eliminated under the Reduced Project Alternatives that relocate the Retreat Center to the South."

[21] See Conclusions, p 2.2-23. It is obvious early on that the Army's consultants were having difficulties with balancing the massive scale of the project with biological concerns, warranting a number of letters from the DPLU regarding biology. See DPLU Letter to Major David Hudson, November 16, 2001, attached. JI1E

[22] See Biology Chapter in this Comment Report; see also attached County of San Diego MSCP Sub-Area Plan map

[23] Not only is the proposed project flawed, but both Alternatives I and II are also flawed. We are not opposed to an educational camp for children in this location, scaled in such a way to provide a remote location for personal growth and a wilderness experience where children can become aware of nature and living harmoniously within our natural environment. Some of the project objectives are consistent with this approach. However, the proposed project and Alternatives I and II are not consistent with the stated project objectives, including being "sensitive to the existing environment"; providing a "camp-like setting with an atmosphere conducive to personal growth that is physically distinct and isolated..."; maintaining the predominately rural and rustic character of the site"; or creating "a design that is harmonious with the natural landscape." See Biology Chapter in this Comment Report.

[24] See Project History, TABLE 1-1, DEIR, p. 1-39

[25] The DPLU has the authority under the California Environmental Quality Act ("CEQA") to "disapprove a project application where there is unreasonable delay in meeting requests", see Section 15109, attached. However, the DPLU was reluctant to do so. See Fax to Supervisor Dianne Jacob, June 5, 2001, regarding JI2

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

JI1D Footnotes: (cont'd.)

18. Comment noted. The Ramona Community Planning Group advises the Planning Director, Zoning Administrator, Planning Commission and Board of Supervisors on planning and land use matters. The decision makers for the Major Use Permit for this project are the Planning Commission, and, if an appeal is filed, the Board of Supervisors.

Response to Comment JI1E:

The EIR acknowledges that the proposed project is not consistent with the County's MSCP, BMO, and RPO and a significant, unavoidable impact has been identified related to this issue. Reduced Project Alternatives I and II are described and evaluated in the EIR and would reduce this impact to a level less than significant. Additionally, the proposed open space, as identified in the EIR, has been reconfigured in order to comply with MSCP Preserve Design Criteria (see RDEIR response to comment IB4). This information was provided in the April 2008 Revised Draft EIR. Further, the April 2008 Revised Draft EIR explains that because there are alternatives to the Applicant's Preferred Project that can avoid these unmitigated impacts, Reduced Project Alternative I is the project that will be presented to the decision makers for consideration.

JI1E Footnotes:

19. Section 2.2 Biological Resources was revised and provided in the April 2008 Revised Draft EIR.
20. Comment noted.
21. Previous correspondence from the County DPLU have identified biological issues related to the project. The EIR evaluates the project as proposed and the extent to which these issues have or have not been addressed by the Applicant.
22. Comment noted.

community, which over the years can begin to lose track of the project and believe the issue has been settled or has gone away.

As a matter of fact, there has been a common perception held by Mussey Grade families over the intervening years between the application and the production of the DEIR that the Salvation Army project had "gone away" and was no longer active. Despite early, growing, and continuous opposition to this project in the community,[26] the inordinate amount of time taken by the Army in this planning process fostered the growth of an inaccurate perception among community members that this project no longer threatened their neighborhood with its massive impacts contemplated in this DEIR. Only through the diligence of volunteer community members in the Mussey Grade Road Alliance has the community remained informed of this project over the seven years it has taken to get to this point. This kind of extended delay is a powerful tactic seen to be used by the applicant in this case to mask its activity. The perception that the Army is not interested in informing the immediate community of its intentions is increased by the fact that the Army initially began work on the site in 1997 without county permits[27]. In addition, the Army posted a legal notice regarding its expansion plans on the grounds at its entrance in 2000 only after the Mussey Grade Road Alliance contacted DPLU Planner Joe Farace to insist that the legal notice be displayed as required by law.[28]

JI2 (cont'd)

JI2

continual time extensions, attached. Also see DPLU letter to Mathew A. Peterson, Esq., June 6, 2001, attached. See, Fax to the Board of Supervisors, June 13, 2001, attached. See, Fax to Robert Copper, Deputy County Administrative Officer, June 25, 2001, attached. See, Fax to Supervisor Dianne Jacob, July 2, 2001, attached. See, County Chief Administrative Officer Walter Ekard Letter to Board of Supervisors, July 26, 2001, attached. Following the DPLU's reluctance to assert its statutory authority in light of continual delays, the Department ineffectually added a warning Note to some of its subsequent correspondence threatening to recommend denial of the project based on Section 15109. See DPLU October 8, 2001 letter, attached and Peterson Letter to Eric Gibson, Chief, DPLU, November 7, 2001, and Fax to Gary Pryor, November 8, 2001, both attached. See, also, Gary Pryor Fax to Diane Conklin, November 16, 2001 enclosing letter dated November 15, 2001 and Pryor Letter to Major David Hudson of the Salvation Army, dated November 16, 2001, attached. Meanwhile, the Army continued to present its application to the Ramona Community Planning Group, which again denied the application based on "its lack of harmony in scale, bulk and density with the existing neighborhood, its harmful effect on the desirable community character and the unsolved fire dangers it represents", RCPG Letter to DPLU, October 21, 2001, attached.

[26] See, for example, the September 7, 1999 petition circulated, signed and sent to the DPLU concerning the project, attached. This petition was only the first indication of the displeasure of the community with this project. The community of Mussey Grade Road has consistently opposed the project; opponents have included and do include neighbors far and wide, contiguous to the Army's land and all along Mussey Grade Road from SR-67 to the end of the road. The Mussey Grade Road Alliance has collected 18 binders of information about the Army's project over the years, only a portion of which is shared in this Comment Report. This community has shown extraordinary resilience, energy and dedication especially in the wake of the disastrous Cedar Fire, in which the community lost 107 homes, and in the face of the overwhelming money and influence the Army has gathered to itself with regard to this specific project and in general. In response, the Mussey Grade community has called on its local planning group and water board to step up to the plate and recognize the community's fervent efforts to preserve this little piece of heaven for the angels it deserves. Both have done so.

[27] See footnote 1.

[28] From notes of telecon with J. Farace and Diane Conklin

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

JI1D Footnotes: (cont'd.)

23. The County disagrees that the Reduced Project Alternatives I and II do not meet the objectives stated in the comment. These alternatives are consistent with the Objective 3 (Final EIR page 1-14) because the new development is clustered near the existing camp facilities and a majority of the site (INSERT AMOUNT) would be preserved as open space. The reference to the comment to a "camp-like setting with an atmosphere conducive of personal growth that is physically distinct and isolated" refers to Objective 4 (Final EIR page 1-14) which is specific to the retreat center component of the project. The County agrees that the location of the retreat center under Reduced Project Alternatives I and II would not fully meet this objective because the originally proposed location of the retreat center would be more isolated and physically distinct from the remainder of the camp. The alternatives would "maintain the predominately rural and rustic character of the site" (Objective 2, Final EIR page 1-14) as explained in DEIR response to comment JA5. The alternatives would also create "a design that is harmonious with the natural landscape" (Objective 5, Final EIR page 1-14) as explained in DEIR response to comment JA5.
24. Comment noted.
25. Please see response to comment JI2.

Response to Comment JI2:

The County acknowledges this comment; however, the issues raised regarding an alleged lopsided review process are not related to an environmental issue pursuant to CEQA. Nevertheless, the extended review process is not a tactic to mask activity or an attempt to degrade community opposition to the project. The project applicant desires to move through the entitlement process as expeditiously as possible. However, the County acknowledges the various complexities associated with the proposed project, which have contributed to the lengthy processing of the project. The County Department of Planning and Land Use wants to prepare an EIR that complies with the mandates of CEQA and the CEQA Guidelines, which includes preparation of a document that can withstand a legal challenge.

In compliance with CEQA and the CEQA Guidelines, the February 2005 Draft EIR was made available for a 45-day public review period (CEQA Guidelines section 15105(a)). The availability of the February 2005 Draft EIR was noticed in the San Diego Union-Tribune newspaper on February 10, 2005. In addition, approximately 75 legal notices were mailed to local, state and federal agencies, organizations (including the Ramona

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JI2: (cont'd.)
Community Planning Group), neighbors, and interested individuals. Further opportunity for public review and comment was provided as part of the public review period for the April 2008 Revised Draft EIR, which was also made available for a 45-day public review period.

JI2 Footnotes:

26. The County acknowledges that there is opposition to the proposed project.
27. Comment noted.
28. Comment noted.

While California courts have recognized the inherent value of public participation in the EIR review process,[29] that process is frustrated and shortchanged either deliberately or collaterally when a project applicant is granted the ability to drive the EIR review for its own benefit.

The result by the time the long-delayed DEIR is issued is a lopsided review process where the applicant in this case, with the complicity of the government, has taken years to complete the DEIR and in the process has used its enormous political and financial resources to publicly lobby for the project.[30] This long, drawn out process also included repeated internal reviews of the DEIR conducted by both the DPLU staff and by staff of the Office of County Counsel. While it is claimed by the county that fees paid by the applicant compensate the county for all of the staff time involved in such project reviews including, presumably, legal assistance given to the project by county lawyers, this remains a questionable proposition until and unless the present fee system is competently reviewed by experts in the field for cost-effectiveness and specifically to answer the question of whether compensation in the form of fees to the county actually covers all of the real costs incurred in years-long review. JI2 (cont'd)

Nevertheless, the system in place in the County of San Diego produces these lopsided results frequently enough that some observers may actually expect unconscionable delays in DEIR preparation, along with the spectacle of county employees, ostensibly paid by county taxpayers, assisting the applicant in every possible way to achieve "an unassailable legal document".[31]

In addition to the drawn out process of producing the DEIR, the comment period of a mere 45 days[32] to review the massive resulting documentation is obviously weighted in favor of the applicant. In this case the entire town of Ramona in the form of its local planning group was given even less time. The Ramona Community Planning Group ("RCPG") received the document from the DPLU days after its issuance on February 10, 2005 and was compelled to hold a public hearing on the DEIR weeks before the March 28th due date for comments due to its own scheduling process.[33] This meant that the planning group had a sum total of less than 30 days to read and comment on this DEIR,

[29] See, CEQA Guidelines, Section 15003, subd. (e), citing *People v. County of Kern* (5th Cist. 1974) 39 Cal. App. 3d. 830, 842 [115 Cal. Rptr. 67] ("[t]he EIR process will enable the public to determine the environmental and economic values of their elected and appointed officials thus allowing for appropriate action come election day should a majority of voters disagree.") Also, "[t]he EIR process protects not only the environment but also informed self-government." (*Laurel Heights Improvement Association v. Regents of the University of California* (1986) 47 Cal.3d 376, 392 [253 Cal.Rptr. 426] *("Laurel Heights I")* JI2

[30] See, for example, online news reports over the years in the *San Diego Union-Tribune* regarding the project as well as at least one favorable editorial in that newspaper published prior to the release of this DEIR.

[31] From notes of conversation held in 2000 with Dr. Glenn Russell, who holds a doctoral degree in archaeology, and Planner Joe Ferace, DPLU primary planner on this project. This comment was made by Dr. Russell during a conversation with Diane Conklin and Carol Levin to explain the desired ultimate outcome of the EIR process.

[32] See attached Legal Notice for this DEIR, attached

[33] See March 16, 2005 Ramona Community Planning Group, attached

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

JI2 Footnotes: (cont'd.)

29. The County of San Diego has, and will continue to comply with the public review process in accordance with CEQA.
30. Comment noted.
31. Comment noted.
32. The 45-day public review period for the Draft and RDEIR EIR complies with CEQA Guidelines Section 15105(a).
33. Comment noted.

which had been refined by the Army over many, many years. By any measure or description, this is not a fair review process.

The built-in unfairness of the process as it has been used in this case sets the bar extraordinarily high for those who may have valid criticisms of the project, either in whole or in part. In order to scale this bar and to achieve some balance of viewpoints of what the project actually is and what it reasonably means for the affected community, community members and their planning group representatives must volunteer to work twice as hard as any of the Army's paid consultants in a truncated period of time without the regular assistance of the county. JI2 (cont'd)

Decision-makers should be clear that the advantages flowing to the applicant in this lop-sided process need to be taken into account in their deliberations concerning the proposed project's effects and suitability. Otherwise the skewed nature of the process means that average citizens are relegated to a secondary position with respect to their own views of the project. Due to the massive nature of the DEIR[34], the years taken to finesse the document, and the limited time frame given to citizens to respond, community members involved receive the signal, whether intentionally or not, that they essentially have nothing very important to say - an outcome inimical to the spirit and the purpose of environmental impact reports to begin with.[35]

Specific Problems

No Reasonable Rationale for the Facility

It is interesting to compare the 2001 Specific Plan with the DEIR because by comparing one gains some perspective on the real facility that the Army intends to build. Such a comparison shed lights, and hopefully reason, on the nature of this project and the destructive and unmitigated impacts it will have on the valley of Mussey Grade Road. JI3

At the heart of the Army's plan is the massive use the project is intended to incur. The Army has consistently played down the commercial use of the project by naming it otherwise. However, the facts are fairly plainly laid out in the Specific Plan,[36] where the Army states:

[34] The DEIR consists of the three massive volumes, including the draft EIR and two Technical Appendices, weighs a total of 8 lbs.

[35] Members of the public hold a "privileged position" in the CEQA process; such status reflects both "'a belief that citizens can make important contributions to environmental protection and ....notions of democratic decision-making...'" (*Concerned Citizens of Costa Mesa, Inc. v. 32nd District Agricultural Association* (1986) 42 Cal.3d 929, 936 [231CalRptr. 748], quoting Selmi, *The Judicial Development of the California Environmental Quality Act* (1984) 18 U.C. Davis L.Rev. 197, 215-216; see also *Mountain Lion Coalition v. California Fish and Game Commission* (1st Dist. 1989) 214 Cal.App.3d 1043, 1051 [263 Cal.Rptr. 104] (upholds writ of mandate requiring respondent to make detailed cumulative impact analyses available to the public, whose members "had actively asserted a keen and sophisticated interest" in proposed hunting regulation and had desired to "fully participate in the assessment of the cumulative impacts associated with th[e] project").) JI2

[36] Specific Plan, Existing Operational Characteristics, p. 10 JI3

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

JI2 Footnotes: (cont'd.)

34. The County concurs that the Draft EIR contains three volumes.

35. The public participation conducted for the proposed project meets the requirements of CEQA.

Response to Comment JI3:

The comment refers to a Specific Plan, but the Specific Plan is no longer proposed. Please also see DEIR responses to comments I3 and I6. The comment raises the issues related to the need for additional revenue to operate the children's camp and the project's tax exempt status. Funding and tax issues are not significant environmental issues to which a response is required.

As stated in the EIR (see Final EIR page 1-4), the retreat center will include the relocation of the existing retreat program facility located on the project site. The existing retreat facility has a capacity of 48 overnight guests, whereas the expanded retreat center would accommodate 175 guests. Functions of the retreat center will include retreats and conferences for young adults, couples, men's groups, women's groups, seniors, and other compatible users. The EIR identifies the operational characteristics of the camp, which operates year-round. The week long summer camp component includes youth camping for eight weeks during mid-June to mid-August. The retreat component includes Salvation Army group retreats and private rentals for the balance of the year. The retreat center would generate revenue to assist the Salvation Army in providing camp opportunities to underprivileged children (see Final EIR page 1-14).

JI3 Footnotes:

36. The Specific Plan is no longer an approval associated with the proposed project.

> **"The existing Salvation Army Divisional Camp and Retreat operates year-round, with operations generally divided into two seasons: 1) on-season, which includes youth camping for eight weeks during mid-June to mid-August; and, 2) off-season, which includes Salvation Army group retreats, and private rentals for the balance of the year." (Emphasis added)**

JI3 (cont'd)

This usage should be compared to the Project Objectives of the DEIR,[37] where the Army states in new verbiage:

> **"Additionally, due to current limitations of the facilities during the summer months, the Army cannot rent the site or allow other Salvation Army groups to use the camp as the camp is used at full capacity for youth camps. This is problematic for two reasons. First, the Salvation Army loses revenue for providing scholarships to underwrite the expenses of providing the youth camp. Rental income during the summer months assists the Salvation Army in their ability to provide camping opportunities to underprivileged children. Secondly, many organizations, including the Salvation Army itself, like to use the facility during the summer. However, this is not currently possible since the existing camp is fully utilized by children's camps." (Emphasis added)**

By this latter reasoning we are expected to believe that the Army requires:

- over 130,000 estimated square feet of building space
- 24 acres of leach lines, and
- 300 parking spaces

in order to cover eight weeks of camping facilities taken up by children.

We are also asked to believe that the Army, the largest charity in the country in 1999[38] and a beneficiary of huge amounts of cash inflow from local gifts bequeathed to the Army during her lifetime and after by McDonald's heiress Joan Kroc,[39] needs the additional revenue to support camping scholarships for underprivileged children.

And, of course, none of the reasoning the Army offers for our understanding of its great need to immensely enlarge its current operations into a facility with a capacity of overnighting hundreds of guests takes into consideration the revenue generated by the

JI3

[37] DEIR. P. 1-12

[38] Knight-Ridder survey published in the *San Diego Union-Tribune*. According to the article, during 1999 the Army collected $1.5 billion nationally.

[39] More recently, the Army did much better locally, collecting that same amount, $1.5 billion, from a single San Diego donor, Joan Kroc. See "Charitable Events Registry 2005," A Supplement to San Diego Magazine, pp. 42 – 43, attached, in which the Salvation Army, designated in the article as the "Nonprofit Organization of the Year," was also described as the recipient this huge windfall bequest. These monies were separate from other Kroc gifts to the Army totaling some $80 million in the late 1990s.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

JI3 Footnotes: (cont'd.)

37. Comment noted.
38. Comment noted.
39. Comment noted.
40. Comment noted.

Army during the other 10 months of the year when the focus is not a children's camp, but a rental conference facility. Certainly that revenue that could be used for children's camping scholarships or any other project for which the Army designates its profits. JI3 (cont'd)

Importantly, it should be noted here that all of the monies produced by the Army's proposed commercial conference center facility would be tax exempt as its present revenues are exempt as well. As a religious organization, the Army pays no monies in the form of local taxes to the county and would pay none as well based on the anticipated year-round commercial use of this proposed facility, which will be advertised and rented out to whomever the Army chooses.[40] In short, no taxes would be paid to any governmental entity on the basis of revenues collected from this business operation.

The following Comment Report, written by volunteers with either direct expertise in the areas of discussion or with generalized expertise applicable to intelligent analysis has been a labor of not only love but duty in order to set the record straight about this proposed project. Chapter authors detail serious problems, omissions and flaws with a view to informing decision-makers and the general public about what is really at issue here. In short, the authors find that there are serious unmitigated fire safety issues for facility users and the neighborhood; that the project is completely incompatible with the community character of Mussey Grade Road and its environs in all of its guises (Project, Alternative I and Alternative II); that traffic impacts to Ramona and Mussey Grade Road will be devastating to both communities; that the biology information contained in the DEIR is outdated, insufficient, inaccurate and misleading; that, aesthetically speaking, this is no way to camp; that the Kumeyaay tribes should be consulted about archeological sites because no one has yet consulted them; and that, incredibly, the reports regarding the huge septic system anticipated by the Army for this facility are not included in the environmental review represented by the DEIR. JI4

Regarding that final point, the almost unbelievable size of the leach fields is delineated in a Summary chart of a report on the septic system, showing a required total of some 97,000 feet of leach lines (or some 16 miles of lines) necessary for large numbers of people the Army wants to be able to accommodate at the facility.[41] JI5

Unfortunately, the Mussey Grade Road Alliance is not in possession of the 2001 report covering detailed percolation tests and calculations of the proposed system and provided to the Department of Environmental Health by Vinje and Middleton Engineering, Inc., because the report is not included in the DEIR. This omission is breathtaking; it points directly to the question of the adequacy of this CEQA document because, obviously, of the scale of the proposed system and the associated potential

JI3 [40] Advertising will be used by the Army according to statements made by Army representatives while presenting their plan initially before the Ramona Community Planning Group in 1999. Indeed, the Army started advertising the children's camp in the local newspaper, The Ramona Sentinel, around the same time the army returned to the planning group for another vote on their plan in 2001. The RCPG voted against the Army in both instances.

JI5 [41] See "Septic System Feasibility Study for the Salvation Army Camp, Ramona," November 2, 2000, Vinje & Middleton Engineering, Inc., attached. The 112,000 feet of leach lines is obtained by adding together all of the "Total Linear Feet Required" in the Summary chart on the next to the last page of the study.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JI4:

This comment represents a summary of the various comment chapters included in the comment report. Please see the following responses for detailed responses to each topic.

Response to Comment JI5:

The County does not concur with this comment. The leach fields have been adequately sized to accommodate the proposed project. In 2009, the DEH approved the septic plan (see letter dated December 21, 2009) and stated that DEH has "no objection to approval of the Major Use Permit Modification." The updated Vinje and Middleton Engineering, Inc. report (December 18, 2009) is provided as Appendix K to the Final EIR. Furthermore, the Mussey Grade Road Alliance is in receipt of the Vinje report, which is included in the "Comment Report on the Draft Environmental Impact Report of the Salvation Army, Volume II – Footnoted Materials in the Introduction" dated March 28, 2005 and referenced as footnote number 41. More importantly, the septic report does not analyze impacts. It is an engineering report to determine the size and location of the system. The information from the report is incorporated into the EIR to analyze potential impacts. Furthermore, pursuant to CEQA Guidelines section 15148, the Vinje and Middleton Engineering report was not required to be included in the EIR.

The existing and proposed leach lines and leach fields are included in the proposed site plan's limits of disturbance (Final EIR Figure 1-4). Therefore, the limits of disturbance associated with the construction of the leach fields is included in the development footprint assumed for the project for purposes of evaluating potential impacts related to Biological Resources (Chapter 2.2) and Cultural Resources (Chapter 2.6). The Final EIR Figure 1-13 identifies the areas currently developed or proposed for development under the Applicant's Preferred Project which includes the proposed leach fields. Figure 2.2-1 Biological Resources Map identifies the biological resources on the project site, and the proposed project impact area. As shown, the leach fields are included in this assumed impact area. Furthermore, the cultural resources assessment included the same development footprint as was assumed for the biological resources. As stated in the Final EIR on page 2.6-9, "Development of the proposed project would not occur in the vicinity of CA-SDI-15113, but the site would have the possibility of being impacted by a potential leach field" and, "Implementation of the proposed project would not directly have a construction impact to CA-SDI-15116. However, adjacent to the site, is a potential leach field area and mandatory brush clearing activities which would involve surface disturbance to the site" and, "Although development of the proposed project would not occur in the vicinity of CA-SDI-15114, a leach field is proposed north

Response to Comment JI5: (cont'd.)
of the site." As such, the leach field system has been included within the development footprint for the proposed project and the potential environmental impacts associated with construction of the additional lines and fields are addressed for each resource, including biology and archaeology within the subsections of Chapter 2 of the EIR. Please see response to comment I-12 and I-19.

JI5 Footnotes:

41. Comment noted.

impacts to biological/cultural resources and water quality. The fact that no associated design and technical information was provided as part of the CEQA public review is a serious omission. County approval of the system should not be considered a substitute for public environmental review. **JI5 (cont'd)**

Absent the actual technical septic system analysis for a large and complex system such as the one contemplated by this Salvation Army, it is virtually impossible for the DEIR reader to get a handle on the potential impacts and design/mitigation measure proposed to address those impacts. As it stands, the lack of information in the DEIR means that the appropriate scrutiny by the public afforded under CEQA is dispensed with; the message is heard loud and clear that a separate analysis will be approved by the County, so trust the County that it will be adequate and everything will work out fine. This is not acceptable. A septic system report should be included as part of the CEQA public review package and the DEIR should address any potential environmental impacts associated with the system such as biology and archeology, to name two. Until this information is included, this DEIR review document is materially deficient and should be rejected by decision-makers.

On another important point, the complicated, subtle and difficult analysis necessary for any comments on the cumulative impacts of the project requires not only time but expertise. Because the project seems to be one big cumulative impact (as there is nothing else like it in the neighborhood), it can be seen to benefit from the lack of other concomitant development. Cumulative impacts usually involve the adding up of various projects in the area to see what the result is when all of the impacts from the projects are considered together. The Alliance, which deems this paragraph as a comment on the cumulative impacts portion of the DEIR, reserves the right to readdress the issue before decision-makers in order to more fully develop the arguments concerning this important matter. **JI6**

Finally, our author on the Biology Chapter has discovered that the biological surveys provided as part of this EIR are outdated and therefore do not provide adequate disclosure of the environmental impacts created by the proposed project. The completion of biological surveys to regulatory standards could add substantial new information to the project, which would require preparation of a supplemental EIR. **JI7**

The proposed project and project alternatives are highly impactive to sensitive biological resources. For Alternative I, a total of 28.57 acres or 39% of the lands impacted include the most sensitive habitat types (Tier-1 and Tier-II). Only 15% of the lands to be conserved, i.e., left undeveloped, contain the most sensitive habitat types (Tier-I and Tier-II). Close to one-third (34%) of all coast live oak woodland habitat (Tier I) mapped on the property would be impacted, and nearly three-quarters (74%) of all Diegan coastal sage scrub (Tier II) would be impacted by the Alternative I project. The development is clearly concentrated in the highest quality, most sensitive habitat areas. **JI8**

Within the EIR and MSCP Findings of Conformance, a serious error is made by concluding that the Salvation Army property does not contain a habitat linkage. There is **JI9**

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, INTRODUCTION (JI SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JI6:
The County does not concur with this comment. Regardless of the complexity of potential project level and cumulative impacts, these elements are addressed in the EIR and are subject to the same public review requirements as mandated by CEQA and the CEQA Guidelines (see Final EIR, Chapter 3.0).

Response to Comment JI7:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comments H11, IB1 and IB2.

Response to Comment JI8:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR response to comment Letter IB.

Response to Comment JI9:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources.

no evidence to substantiate this claim. No wildlife movement studies were done, nor even a map-based analysis of appropriate movement routes along valleys, canyons, ridgelines, and trails to larger offsite blocks of open space habitat. No analysis of surrounding undeveloped open space and existing preserves was included, nor even any mention of the adjacent wilderness preserves.

It is stated in the EIR and Findings of Conformance that the project site is located within the Multiple Species Conservation Program (MSCP), outside of any pre-approved mitigation area. This statement is incorrect for two reasons. A portion of the site is within the MSCP pre-approved mitigation area in the southwest corner of the site (refer to map on last page of Findings). Secondly, the Salvation Army property is fully encompassed within a preserve acquisition area identified by CDFG and the County in the Conceptual Area Acquisition Plan (CAAP) for Iron Mountain Ridge – Canada de San Vicente Preserve. The CAAP was approved and adopted by the County and CDFG in 1999. The CAAP, in conjunction with the MSCP, has resulted in the acquisition of approximately 2,714 acres of habitat bordering the Salvation Army property. The preserve includes the former Boys and Girls Club property and the Boulder Oaks Ranch, which were identified in the CAAP as the top two acquisition priorities. The Salvation Army property along with several other parcels, collectively referred to as the Iron Mountain Palisades – Golden Eagle Nest Area, are identified in the CAAP as the third acquisition priority for the preserve. **JI9 (cont'd)**

As detailed in the Biology Chapter comments, the Salvation Army property is clearly and undeniably a habitat linkage and provides an important connection between existing large blocks of open space. The onsite habitat linkage is important for regional movement of wildlife. The linkage is also important for genetic exchange for plant and animal species, particularly those species reliant on the lower-lying oak woodland, wetland, coastal sage scrub, and grassland habitats.

The proposed project and alternatives would impact the majority of habitat within this onsite linkage. The east-west travel route along the tributary creek will be impinged on by improvements to the main road into the facility plus a dramatic increase in number of daily trips on this road. The north-south travel route will be blocked by development wrapping around the lower slopes of the central hill and extending through the broad, wooded valley to the south. The proposed project and Alternatives I and II do not conform with the BMO Design Criteria for Linkages and Corridors, numbers 1 to 10. Therefore, the BMO findings necessary to approve the project cannot be made.

MSCP Conformance Findings cannot be made for the following reasons:

- The regional habitat linkage made up by both north-south and east-west wildlife movement corridors has not been maintained (Design Criteria for Linkages and Corridors 1-10)
- Project development is not sited in areas to minimize impact to habitat (BMO Criteria 1)
- Habitat structural diversity of conserved habitat areas is not maximized (BMO Preserve Design Criteria 2 and Subarea Plan Findings 2)

- Conservation of spatially representative examples of coastal sage scrub and other high value habitats are not provided (BMO Preserve Design Criteria 3 and Subarea Plan Findings 3)
- Development is not focused in the least sensitive habitat areas (BMO Preserve Design Criteria 5 and Subarea Plan Findings 5)
- Preserved habitat is provided in several separate islands that do not connect with one another or the existing open space preserves bordering the property. No guarantees are given that areas not proposed for development will remain intact (Preserve Design Criteria 4, 7 and Subarea Plan Findings 4, 9, 10, 11)
- Special emphasis has not been placed on conserving adequate foraging habitat near golden eagle nest sites (Subarea Plan Finding 7)

JI9 (cont'd)

Given the serious flaws in the analysis for the MSCP Findings of Conformance and the failure of the project to conform to the above findings, the project cannot be considered viable. Alternatives I, II, and proposed project each fail to meet the standards necessary to conform to the BMO Project Design Criteria, Preserve Design Criteria, and Design Criteria for Linkages and Corridors, and to conform with the objectives of the County MSCP Subarea Plan.

NOTE: SEE VOLUME II FOR MATERIALS FOOTNOTED IN THIS SECTION

MUSSEY GRADE ROAD ALLIANCE

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FIRE CHAPTER

By Joseph Mitchell

Fire and safety hazards posed by the Salvation Army facility expansion

by Joseph W. Mitchell

The expansion proposed by the Salvation Army poses a significant threat to the lives and property of the residents of Mussey Grade Road as well as to the attendees of the facility. Primarily, this threat originates from the fact that the facility sits near the upper end of the Mussey Grade Road corridor, and evacuation from the facility would slow or prevent evacuation of residents living to its south. The EIR presented by the Salvation Army (SA) cursorily dismisses this issue. Furthermore, it draws dangerously incorrect conclusions from experiences in the 2003 Cedar fire. This project cannot be allowed to go forward as proposed without creating a safety hazard to area residents and camp users, nor without placing both the County of San Diego and the Salvation Army in a position of extreme liability risk. **JF1**

Mussey Grade Road – The "Tunnel of Death"

Mussey Grade Road can be divided into two segments divided at the Dos Picos County Park road. North of this intersection, the road is relatively straight and rural/residential. To the south, it is a narrow, curving, poorly maintained dead-end road that winds through oak-riparian woodland until reaching the small community of Fernbrook roughly two miles to the south. It is near the northern end of this oak-canopied area that the Salvation Army facility sits. **JF2**

Fires and resulting evacuations are common in the area. While the Cedar fire removed much of the existing fuel load, regrowth is well underway, particularly with the extremely high rainfall of the 2004-2005 season. The corridor will once again be at risk of a significant fire in less than five years. The lush growth, limited visibility, and proximity of vegetation to the roadway is recognized by local fire professionals as presenting a safety hazard to fire crews. In an investigation following the Cedar fire, it was learned that local fire crews had nicknamed the Mussey Grade corridor "The Tunnel of Death"[1].

This notion of the extreme fire hazard in the Mussey Grade corridor was no doubt partially responsible for the decision not to send any professional firefighters south of the Dos Picos Road during the Cedar fire. In the "triage" of areas during the Cedar Fire, this neighborhood was apparently determined to be indefensible, so no ground crews or air tankers were made available for fire suppression or structure protection.

The lack of resources available during the Cedar Fire must be considered typical of the wind-driven catastrophic fires that statistically are responsible for most of the structure loss that occurs during wildfires[2]. Should a massive fire threaten in the future, it is not unlikely that the Mussey Grade Road area would face exactly the same lack of professional fire support that was evident during the Cedar Fire.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, FIRE CHAPTER (JF SERIES) DATED MARCH 28, 2005

Responses to Comments JF1 through JF13:

Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials. Please also see RDEIR responses to comments Letter D, H15 through H42, H59 through H71 and IF1 through IF50.

Evacuation: The Cork in the Bottle

The proposed Salvation Army expansion would more than double the population of southern Mussey Grade Road[3]. Mussey Grade Road is currently the only exit that all of these people would have in an emergency, an exit that would have to be shared by both local residents and people occupying the retreat/conference center. Because the SA facility sits at the northern end, its evacuation effectively blocks or slows the evacuation of all residents to the south. There is no secondary emergency exit available to the SA facility that does not finally empty onto Mussey Grade Road. All proposed "alternative" evacuation routes in their plan empty onto Mussey Grade[4], which provides no relief if congestion on Mussey Grade is the limiting factor in evacuation. This evacuation hazard will have two possible profiles, due to the different seasonal usage that the SA plans for the facility: JF3 (cont'd)

- During the two-month period during summer when the camp purportedly is to be used by children, the SA plans to use busses to bring the children and remove them from the facility. Unless sufficient busses and drivers are in place for all children to be evacuated, this could lead to entrapment at the camp. If staff panic and try to lead the children out on foot, this could effectively block evacuation of Mussey Grade for a considerable time as well as endanger their charges. According to the proposed evacuation plan (Draft EIR, Appendix I), two busses will be used to ferry the camp residents to a staging area outside of the threat zone. For the camp at nearly full occupancy, this would require many trips. There are two major problems with this approach:
    - During the congestion accompanying evacuation, it can take a very long time to get out of the Mussey Grade area. Experience during the Cedar fire, as reported by local residents[5], indicates that evacuation could take 30 to 40 minutes. If the fire is moving rapidly (the head of the Cedar fire, for instance, moved at up to 3 miles per hour during its initial run[6]), the time window for safe evacuation may be too short to allow multiple visits by the busses.
    - The road may be closed to incoming traffic during the emergency. If the person manning the road block perceives that the road is or will soon be impassable, they may refuse to let the bus driver endanger his or her own life in order to access the camp.
- During the 10 month period during which the SA rents out the facility, many camp visitors will arrive by car, and will be permitted to use all available parking at the facility (300 parking spaces – 188 designated and 112 overflow parking[7]). These cars would all enter the traffic stream of Mussey Grade Road during an evacuation. This would effectively cut off or slow evacuation of southern Mussey Grade. If insufficient vehicles are available, people unfamiliar with wildland fire are likely to panic. Adults will be less controllable than children in an emergency situation, and will be more likely to "run for it" in order to save their own lives. This would potentially place not only them, but other evacuating residents, in a position of great risk.

In recognition of this danger, the Ramona Municipal Water District (responsible for fire protection in the Ramona area) on 3/22/05 decided to recommend to the County that a JF4

secondary access emptying either onto Route 67 or Dos Picos Rd. be required for evacuation purposes. While this does not completely address the evacuation issue (Dos Picos Park Rd. empties onto Mussey Grade, so this alternative would still create congestion), it does indicate that this issue is of great concern to the RMWD.

History of the Salvation Army Fire Plan

JF4 (cont'd)

Since the 1999 submission of the Salvation Army EIR, the fire issue has been of extreme concern to residents of the Mussey Grade Road neighborhood south of the facility. The SA's plan for fire emergency has evolved little since the initial submission, which they managed to get approved by Ramona's Fire Marshal, Steve Delgadillo. This decision was appealed by residents concerned about their safety in a wildfire first to the Ramona Municipal Water District in 2000, and then up the CDF chain of command all the way up to Andrea Tuttle, Director of the CDF at that time. It was pointed out by residents that all camp exits referred to in the EIR channel into Mussey Grade Road. In fire plans for other large developments, such as Monta Vista Ranch, the Fire Marshal had required a secondary fire access be obtained as a prerequisite to approval. In a meeting on November 21, 2001 attended by several Mussey Grade residents[8], and CDF officials Delgadillo, and his supervisors Charles Manor and Ken Miller, residents were told that a secondary emergency access would not be required for the SA facility "because they cannot get one". In a follow-up letter to Chief Ken Miller[a] by the Mussey Grade Road Alliance (attached[9]), many of the points raised in this submission were already raised. Miller's response to this letter (included in Appendix H of the draft EIR) does not adequately address the evacuation issue.

JF5

The alternative proposed in earlier versions of the fire plan was to have camp residents "shelter in place" during a fire; in other words to remain at the camp during the fire and allow the fire services to protect them. This was the operative alternative when the discussions between the Mussey Grade residents and the CDF occurred. However, this alternative has disappeared completely from the current plan, possibly because the lack of fire response in the area during the Cedar fire showed it to be an untenable proposal[a].

JF6

The appeal letters to the CDF resulted in an added requirement that busses be available at all times to evacuate the facility's users. Only two busses are now proposed to be kept on site to evacuate 800 people, and only when children are present. This is clearly inadequate to effect a rapid evacuation of the facility if the children are endangered, and makes no provision for the event where adults arrive in chartered busses.

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[a] Chief Miller has now assumed the duties of the San Diego County Code Specialist.

JF5 [a] During its presentation of the draft EIR to the Ramona Community Planning Group in March 2005, the Salvation Army's consultant stated that "shelter in place" was still being discussed with the Fire Marshal as the most likely protection scenario, according to an article appearing in the Ramona Sentinel (March 24, 2005, p. A4). If so, this is disturbing, as it would indicate willful withholding of information released to the public in the draft EIR. This suggests a strategy of presenting a "fake" plan to the public, and then being able to refute public and agency criticism by releasing the "real" plan to address all the issues that the public raises with the "fake" plan. The public & agencies, then, never get to comment on the "real" plan. The only acceptable remedy if this turns out to be the case would be a complete rejection of the current plan with the requirement that the draft EIR be resubmitted for public comment with the actual fire plans included.

In light of the new Draft EIR released by the SA in early 2005, concerned residents revisited the RMWD to reiterate their request that a secondary access not emptying onto Mussey Grade Rd. be required for this project. During the RMWD meeting on March 22, 2005[10], Fire Marshal Steve Delgadillo explained that his approval of the SA's fire plan did not take into account the traffic conditions or safety of other residents on Mussey Grade Road, since these issues were outside the scope of the Salvation Army's fire plan. *In other words, no analysis of the safety impact that the evacuation of this camp would have on other residents has been done.* The Fire Marshal stated his belief that such an analysis and corrective actions (such as a required secondary access) more properly belonged to other approving agencies. He agreed that a secondary access off of Mussey Grade, if available, would improve the fire safety of the camp. The RMWD concurred, and voted to request that the County require a secondary fire evacuation route onto Dos Picos Park Rd. or State Route 67 as a condition for the approval of the EIR[11]. **JF7**

The Cedar Fire: Tragedy for the present and warning for the future

The Salvation Army maintains that the fact that it was able to safely evacuate 100 attendees during the Cedar fire, and that this vindicates its fire plan. This is similar to a person who survived an automobile accident at 45 mph proclaiming that a crash at 100 mph would be safe. This ludicrous type of "it worked once" argument can be found to be at the root of many tragedies and disasters. There are three specific ways that the argument drawn from the Cedar fire is flawed: **JF8**

- The residents of the SA facility and Mussey Grade Road were lucky with respect to the manner in which the fire hit the area.
- The expansion will increase the evacuation load by a factor of more than six.
- The evacuation of the SA camp noticeably impacted the rate of evacuation of Mussey Grade Road.

The southern Mussey Grade corridor suffered a 60-70% residential loss rate, so in what sense can it be considered "lucky"? It must be remembered that nobody died in the "Tunnel of Death", even without formal evacuation orders being issued. This was due to the slow rate at which it progressed up the corridor, which gave most residents enough time to evacuate safely. **JF9**

The wind speed and direction primarily determined the spread of the Cedar fire (see Figure 1), although its alignment with the ridgelines facilitated its lethal race through the Barona and Wildcat Canyon areas. The head of the fire passed to the south of the Mussey Grade valley, which was hit with its expanding flank. Once the fire rounded San Vicente reservoir, however, it began an upslope burn along the valley bottom. Fernbrook residents were surprised, as they watched the flames they expected to descend from the Kimball Valley ridge, to see another flame front more rapidly approaching from the south[12]. The flames reached Fernbrook at approximately 7 a.m., but did not reach the SA facility until between 9 and 10 am, giving a net speed of less than one mile per hour[13].

The wind direction during the Cedar fire was variable, but predominantly NE in direction[14]. What if the direction was slightly changed to say ENE or E? The situation faced at the Mussey Grade corridor would have been very different. Had the head of the fire struck along the length or the neck of the road, the entire neighborhood would have faced entrapment, and the speed of evacuation would have been a life and death issue. This scenario is illustrated in figure 1 by the dashed arrow. Under these conditions, visibility would have been very poor due to smoke, and firebrands would be falling in advance of the front, starting spot fires. If the front arrived during evacuation, residents would have been trapped in their cars, and many might have perished. This did not happen in the Cedar fire, but it is not an unlikely scenario for future fires.

JF9
(cont'd)

Now add to the burden over 650 additional people to be evacuated, and the magnitude of the safety problem posed by the SA facility becomes apparent. They claim that this will not adversely affect the evacuation rate of Mussey Grade road, because their Cedar fire evacuation of 100 people did not. While this claim does not pass the test of elementary logic, in fact there is additional evidence that even the evacuation of 100 people may have contributed to a traffic jam on Mussey Grade. According to an eyewitness account given during the RMWD Cedar fire hearings[15], the traffic speed at 7:30 am on Mussey Grade road was around three miles per hour. Perhaps not coincidentally, this is ten minutes after at which the SA compound was evacuated, according to the EIR. This indicates that *the occupancy levels CURRENTLY in place at the Salvation Army Conference Center present an evacuation hazard to the neighbors to the South.* Further increase can only exacerbate this problem. The SA's touting of their successful evacuation during the Cedar fire, at the expense of their neighbors to the south, is a further indication of their obliviousness to the impact this facility has on its surroundings.

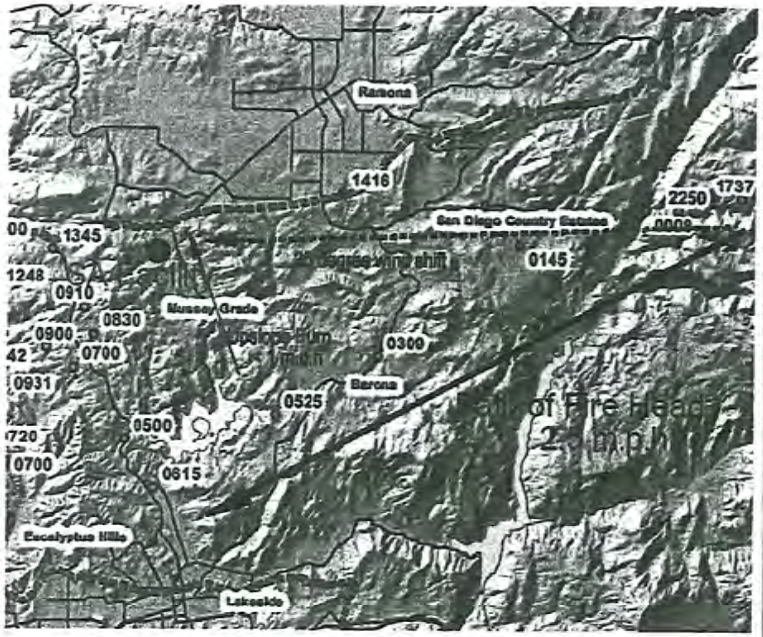

Figure 1 – This figure shows the chronology of Cedar fire incident reports from the fire origin point to points west of the Mussey Grade area (from USFS/CDF report[16]). The path of the head of the fire is traced, and can be seen to have struck to the south of the Mussey Grade neighborhood. The wake of the fire burned upslope, reaching the SA facility (indicated by the dot) between 9 and 10 a.m. (Chronologies for the MG area are determined from the RMWD hearings transcripts[17].) Had the wind direction been 25° more easterly, the fire would have reached the neck of Mussey Grade road near the Salvation Army facility up to three hours earlier, potentially overrunning evacuating residents.

JF9 (cont'd)

Secondary Hazards

Other hazards may be presented by thousands of people unfamiliar with the fire risks of the California backcountry coming into contact with the native chaparral, particularly if there are any lapses in supervision or orientation. In particular, smoking would present an active hazard created by the camp. While the Salvation Army would undoubtedly try to control smoking, the fact remains that nicotine is an addictive drug, and that users, particularly children, might be tempted to "sneak a smoke". If smokers attempt to hide their activities in the chaparral, there is the potential for the accidental ignition of a wildland fire.

JF10

While it can be argued that such a risk has existed with past and present camp usage, the vastly expanded usage of the camp would greatly increase the probability of such an

event. If the ratio of counselors to attendees is allowed to drop as an expansion occurs, the probability of such an accident would be correspondingly increased. It should be noted that in the current EIR, the staff lodging for the camp counselors is significantly separated from the resident lodging, further complicating the problem of supervision. **JF10 (cont'd)**

In general, increasing the contact between people unfamiliar with the California back-country and its fire risks and the native vegetation increases the probability of accidental (or deliberate) fires being started by the fraction of that increase. Residents of Mussey Grade are for the most part knowledgeable about the risks to the neighborhood, and have a vested interest in the prevention of fires, and so should not be counted in the increase in that fraction. A significant increase in the usage of the Salvation Army camp would cause a significant increase in uniformed visitors to the Mussey Grade area and would thereby increase the fire risk.

No Mitigation Possible

No effective mitigation is possible for several of the problems posed by the facility expansion.

Secondary Access

The problem of *secondary access* would only be addressed if the SA were able to purchase a number of properties to the north of the facility in order to open up a secondary access onto State Route 67. They do not currently own these properties, and so no secondary evacuation route is possible. While an exit onto Dos Picos Park Rd. would facilitate evacuation of the immediate area of the camp, because it empties onto Mussey Grade Road it would not alleviate the congestion on the main artery leading out of the evacuation zone. No easement is available for this access, either. **JF11**

Shelter in Place

This lack of secondary access has been addressed in some earlier revisions of the EIR by suggesting a "*shelter in place*" strategy for the camp. In this model, residents would remain at the camp while fire personnel would protect them. This model was effectively used at nearby Barona Casino during the Cedar fire. A number of factors, however, render it inappropriate for use in the Mussey Grade area:

- The Barona Casino has a sizable green belt surrounding the facility, including a golf course, unlike the SA center which will be in closer proximity to the adjacent chaparral.
- It has been established that fire professionals consider accessing Mussey Grade during a catastrophic wildfire to be a safety hazard – in fact a hazard great enough to justify their non-intervention during the Cedar fire. A shelter-in-place strategy would be asking them to accept such a hazard.
- It is unlikely that adults who have transportation available will wait for fire personnel to arrive as the fire approaches. Last minute panicked evacuations are the primary cause of civilian deaths during wildland fires. Their unplanned evacuations would interfere with the evacuation of residents to the south.
- The vegetation clearance distance specified in the EIR is 100 feet for normal structures and 30 feet for especially fire-resistant structures. A recent study, however[18], indicates that probability of structure ignition at 100 feet will be greater than 50% during a catastrophic fire, implicating firebrands (embers) as the

primary ignition mechanism. This study and its referenced sources claim that 60-70% ignition rate of structures close to the front is typical of wind-driven fires. These results are consistent with many previous studies.[19] This was the loss rate in the affected Mussey Grade area. The Salvation Army facility was compliant with existing fire codes, and yet lost a large fraction of its structures during the Cedar fire. This would not have been a safe place for residents to shelter. Due to the large propagation distance of firebrands, additional clearing beyond 100 feet is not an effective countermeasure.[20]

JF11 (cont'd)

- Personnel and guests remaining at the camp during a conflagration can be exposed to dense smoke, possibly causing injury. Sufficient medical facilities will not be available at the camp to treat a large number of casualties, and the treatment of smoke inhalation, eye injuries, and burns would have to wait until the road was cleared and secured.
- According to the evacuation plan, during an emergency the camp residents are expected to gather at a baseball field[21]. Firebrand showers can occur well in advance of the fire front, and can be hazardous to improperly attired people. Light weave cotton fabrics can combust, and synthetics can melt, causing deep burns.
- The SA plan notes that fire agencies have the capacity to access the camp by helicopter due to the large open fields at the site[22]. Helicopters capable of delivering a strike team of firefighters (such as the Sikorsky Firehawk[23]) are not currently deployed by CDF or stationed at the Ramona Air Attack base. Catastrophic wildland fires, additionally, are accompanied by high wind conditions at some points in their lifecycle. This is how they escape confinement and become catastrophic to begin with. Air operations during this phase can be hampered by high-wind conditions, as they were on the first day of the Cedar fire. Smoke can also render the landing site unusable. Access to the camp via helicopter during a major fire cannot be guaranteed.
- The statistics for area burned in wildfires, the number of structures lost, and the number of fatalities are driven by large scale wind-driven catastrophic events, of which the Cedar fire is an example. During these events, resources are spread extremely thin as firefighters are outpaced by a rapidly expanding fire front. This raises the likelihood that reliance on "shelter in place" strategies will sooner or later result in a mass casualty event[24]. If the protection that residents are awaiting does not arrive, many may flee at the last minute, putting them at extreme risk.
- Even a successful "shelter in place" operation would divert significant firefighting resources from the neighborhood, since lives would appropriately be given higher priority than property. This could result in significant loss of property.

Reduced size of the expansion

It has been shown that the Mussey Grade Road evacuation rate is strongly limited by its current population, including that of the current Salvation Army facility, as evidenced by the slowing of traffic on Mussey Grade Road at the time the facility evacuated. Further increase in the conference center / retreat's permitted occupancy will further exacerbate this situation.

Both Alternatives I and II[25] are substantial expansions over and above the current usage. In neither of these proposals is the number of parking spaces reduced. Therefore, *the potential evacuation hazard is not appreciably mitigated by the reduction in occupancy.* **JF11 (cont'd)**

These proposals, for 615 and 513 users respectively, above the current allowable occupancy claimed by the SA (160 persons), increases the number of people unfamiliar with wildland fire potential and conditions by a factor of 3.8 and 3.2 respectively – still a significant increase.

The exact nature and behavior of the next fire to threaten the area is unknown, and so comparison of alternative plans should be compared as how they affect the probability of catastrophic loss of life. While alternatives with smaller occupancy will not have the same impact on this probability as the larger plan, they will nevertheless increase it. Unless comprehensive simulations of evacuation under reasonable worst-case conditions are run, it is not possible to determine a "safe" level of camp expansion.

Conclusion

Without the addition of a secondary access road that does not empty onto Mussey Grade Road, the Salvation Army expansion must be viewed as significantly increasing the risk to visitors and neighbors alike. The SA's claim that "all necessary precautions have been taken to protect the Salvation Army Divisional Camp's buildings, employees, and guests from the threat of wildland fires"[26] is false. Accepting this plan or one of its proposed alternatives would be an act of negligence that would place the County of San Diego, the CDF and the Salvation Army into a position of potentially extreme liability. Willfully ignoring hazardous conditions that have easily foreseeable consequences constitutes gross negligence, and this voids immunity claims. This is the basis of the current lawsuit filed against the CDF and the County on behalf of Cedar fire victims[27]. No expansion should be allowed before the Salvation Army can demonstrate through its plans and actions that it is committed to the safety of its neighbors as well as the users of the retreat / convention center facility. **JF12**

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[1] Krysak, Robert & Kit Kessinger; Report of the Ramona Municipal Water District Cedar Fire Ad Hoc Committee; January 10, 2005, p. 30; http://www.rmwd.org/Fire%20Report/Committee%20Report.pdf Also available from the Ramona Municipal Water District, 105 Earlham Rd., P.O. Box 1829, Ramona, CA 92065.

[2] Mitchell, Joseph W.; *Wildfire*; May/June, 2005; *publication pending*

[3] Number of residences is very approximately 180. At approximately 3 persons per household, this would give a population of 540 people.

JF3 [4] Salvation Army Divisional Camp and Retreat Draft EIR, 2.3-1

[5] Ramona Municipal Water District Cedar Fire Hearings, January 2004; http://www.musseygraderoad.org/CedarIndex.htm; also available in original audio format from the Ramona Municipal Water District, 105 Earlham Rd., P.O. Box 1829, Ramona, CA 92065.

[6] The 2003 San Diego County Fire Siege Safety Review; California Department of Forestry and United States Forest Service

[7] Salvation Army Divisional Camp and Retreat Draft EIR, p. S2

JF4 [8] Residents attending this meeting included Carol Levin, former CDF Fire Captain Art Bale, Betty Mabee (owner Golden Eagle West and Golden Eagle East Ranches), Mussey Grade Road Alliance spokesperson Diane Conklin, and report author Joseph Mitchell.

[9] Letter (attached); From Mussey Grade Road Alliance to Chief Ken Miller, California Department of Forestry, January 31, 2002

JF7 [10] Audiotapes are available from the Ramona Municipal Water District, 105 Earlham Rd., P.O. Box 1829, Ramona, CA 92065.

[11] RMWD reference: P70-379W2, Log no. 98-14-023, SCH No. 2000031058 SALVATION ARMY DIVISIONAL CAMP AND RETREAT.

[12] Ramona Municipal Water District Cedar Fire Hearings, January 2004

[13] Ibid.

JF9 [14] The 2003 San Diego County Fire Siege Safety Review; California Department of Forestry and United States Forest Service

[15] Ramona Municipal Water District Cedar Fire Hearings, January 2004

[16] 2003 SD Co Fire Safety Rev; p. 14

[17] Ramona Municipal Water District Cedar Fire Hearings, January 2004

[18] Chen, Keping and John McAneney; Geophys. Res. Lett. 31; L12212; 2004

[19] Ramsay, G.C., McArthur, N.A. & Dowling, V.P.; Preliminary results from an examination of house survival in the 16 February 1983 bushfires in Australia. Fire and Materials, 11 (1987) 49
Dowling, V.P.; 1994; Ignition of Timber Bridges in Bushfires; Fire Safety Journal; v. 22; pp. 145-168
Ramsay, G. C., et. al; "Building in a fire-prone environment: research on building survival in two major
JF11 bushfires"; Proc. Linn. Soc. N.S.W; 116; 133-140; 1996

[20] Cohen, Jack D., 2000, Preventing disaster: home ignitability in the wildland-urban interface, Journal of Forestry 98(3), pp. 15-21

[21] Salvation Army Divisional Camp and Retreat Draft EIR, Appendix I

[22] Salvation Army Divisional Camp and Retreat Draft EIR, 6-16

[23] Information on aerial firefighting options provided by Wildfire Research Network, 415 S. Topanga Canyon Blvd. #190, Topanga, CA 90290. Email: wildfireresearch@yahoo.com

[24] Mitchell, Joseph W., *Wildfire*

[25] Salvation Army Divisional Camp and Retreat Draft EIR, 4.3 & 4.4

JF12 [26] Salvation Army Divisional Camp and Retreat Draft EIR, 2.3-6

[27] Cary versus San Diego County and the California Department of Forestry (see attached complaint).

Joseph W. Mitchell was born in 1959, in Ohio. He received a BS degree in physics from Ohio State University in 1981. He worked as an experimental particle physicist from 1981 to 1996 at laboratories in Los Alamos, Geneva and Hamburg, and received his Ph. D. in 1989. He was hired by a software group in a major international corporation in 1996, with which he remains employed. He returned from Brussels in 1999 and settled in Ramona, California. At the urging of his fire-conscious wife Diane Conklin, he designed and implemented an external sprinkler system to work under high-wind conditions. This was constructed in 2002, with the backup system completed on October 25, 2003, one day before the Cedar fire. He started M-bar Technologies and Consulting in 2004 to spread information on the WEEDS system, the danger of firebrand ignitions, and the importance of taking high-wind conditions into account for all wildland fire planning. **JF13**

JF
Attachment

RAMONA MUNICIPAL WATER DISTRICT
105 Earlham Street
Ramona, CA 92065-1599
Telephone:
(760) 789-1330

March 23, 2005

San Diego County
Department of Planning and Land Use
5201 Ruffin Road
San Diego, CA. 92123

RE: P70-379W2, LOG NO. 98-14-023; SCH NO. 2000031058; SALVATION ARMY DIVISIONAL CAMP AND RETREAT

The Ramona Municipal Water District, as the responsible agency, submits this supplemental comment to the draft EIR for the extension of the Salvation Army Camp in consideration of the Cedar Fire and potential impact upon Mussey Grade Road in the event an evacuation during a major catastrophe such as the Cedar Fire.

Be advised that the project require a secondary access onto Dos Picos Park Road or Highway 67, and not onto Mussey Grade Road south of Dos Picos Park Road.

Please consider this comment as an additional condition that shall be included in the Major Use Permit to mitigate for Hazards and Public Safety impacts related to potential fires in the project area under Section 9.1.3 Hazards and Hazardous Materials, item MM 2.3.b.

Thomas L. Brammell
General Manager

JF
Attachment

MUSSEY GRADE ROAD ALLIANCE
P.O. BOX 683
RAMONA, CA 92065

(760) 787 - 0794 ; (760) 788 - 5479 Fax

January 31, 2002

Chief Ken Miller
California Department of Forestry (CDF)
County of San Diego
2249 Jamacha Road
El Cajon, CA 92019

Re: Local Community Fire Concerns in Connection with the Proposed Major Use Permit Expansion for the Salvation Army Sierra del Mar Divisional Camp and Conference Center; MUP 70-379W2

Dear Chief Miller:

On behalf of the Mussey Grade Road Alliance, I want to thank you for meeting with us on November 20, 2001, to discuss our grave concerns regarding the fire safety of a proposed major conference center complex to be built on historical Mussey Grade Road by the Salvation Army and to accommodate 780 persons, referenced above.

As you know, the Mussey Grade Road Alliance is a grassroots citizens group consisting of over 150 families, who live along the road. We have been organized since August 1999 to preserve and protect this 19th century stagecoach road. The road is the sole ingress and egress for the entire community living alongside it. The proposed project of the Salvation Army is located in the middle of the five-mile Mussey Grade Road, which begins at Highway 67 and dead ends at Lake San Vincente Reservoir.

As promised, I am writing to you on behalf of the Alliance following our meeting in your El Cajon offices. You told us then that you would respond in writing to our objections regarding this placement of a major fire hazard on Mussey Grade Road. We assert that the expansion plan put forward by the Salvation Army and approved by the CDF Ramona Fire Marshal Steve Delgadillo is akin to planned negligence.

Briefly stated, we object to the decision made by CDF Fire Marshal Steve Delgadillo to allow this plan to go forward without requiring a secondary access road for the purpose of evacuation of visitors from the complex in the event of a wildland fire. We object to the lack of scrutiny of this project shown by CDF in the person of the fire marshal and are convinced that a secondary access road must be made a requirement now.

We live in a high-walled box canyon. Mussey Grade Road is the single road in and out of this canyon. In case of wildland fire, we assert that dumping all emergency and transiting vehicles onto two-lane Mussey Grade Road would block our sole evacuation route and would endanger our lives and property.

We believe the fire marshal has placed the interests of the Salvation Army above the safety and security of our community by relying on a "sheltering in place" strategy. This strategy is a recommendation, not a code requirement, and we believe its proposed use in this case illustrates a callousness concerning the safety of the thousands of future visitors to the complex. We are appealing Fire Marshal Delgadillo's decision to you. We ask you to reverse it, and require a secondary access road.

As was repeatedly pointed out to you by retired CDF Captain Art Bale during our meeting, the "sheltering in place" strategy suggested by the fire marshal as the main strategy in case of a wildland fire at the Salvation Army site[1] does not take into account the dangers of smoke inhalation and other medical emergencies that would inevitably result from this strategy. We wonder why the CDF fire marshal favors such a strategy over the obvious option of an emergency evacuation from the site. We believe his decision was influenced by the impossibility, under the Salvation Army plans, of evacuation from the property.

For example, if an evacuation was ordered the 188-space parking mentioned in the Salvation Army's Specific Plan[2] to support the maximum daily onsite population of 780[3] people is insufficient to accommodate the emergency evacuation of those 780 people. In fact, the Specific Plan anticipates the use of buses[4] to transport visitors to and from the complex. However, the Salvation Army has publicly stated to the South Subcommittee of the Ramona Community Planning Group last year that these buses would not stay on site. The result is that the Salvation Army could not evacuate the total number of visitors the complex will be able to accommodate at capacity, and thus would violate the penal code if ordered to do so by county sheriff personnel.[5]

Nevertheless, the proffered CDF answer to the local community regarding this problem seems to be the "sheltering in place" strategy. This strategy anticipates neither the real life-threatening danger to the people at the site nor the heavy demand likely to be placed on emergency response services that do not exist within the Ramona Community Planning Group Area. Worse, while sheltering in place may, under certain conditions, be a viable safety option, in this case it becomes the only option.

We ask you to imagine a fire travelling across thousands of uninhabited acres of wildland, whipped by Santa Ana winds and absent all but natural barriers, bearing down on the Salvation Army complex. Under these conditions, not uncommon for wildland fires in San Diego County, of what use would this strategy be? We believe, in fact, that this strategy of "sheltering in place" under real fire conditions amounts to no strategy at all. In fact, if the fire marshal is satisfied with the fire protection he has required to be in

[1] Delgadillo August 10, 2000 Letter to Chief Garrett
[2] Salvation Army Divisional Camp and Retreat Specific Plan, dated August 20, 2001, at p. 35, (hereinafter referred to as "Specific Plan")
[3] Specific Plan, p. 15
[4] Specific Plan, p. 37 under "Circulation"
[5] See Sections 409.5 and 409, Crimes Against the Public Peace, California Legal Code

JF
Attachment

place at the complex and there is no code requirement for the evacuation of a large scale facility[6], we wonder why he is considering a "sheltering in place" strategy at all in connection with this project. However, despite these obvious problems with the use of "sheltering in place" for this project, it has become the mantra of CDF officials in Ramona.

For instance, Ramona Air Attack Base Battalion Chief Steve Butler, a member of the Ramona Community Planning Group, told a packed planning group meeting discussing the Salvation Army project last year that the 100-foot clear zones around the buildings "...would allow a fire to blow through without spreading from vegetation to structures, leaving no need for an evacuation."[7] Not content with these comments, Chief Butler continued: "I hope those of you on Mussey Grade create a fire safe perimeter around your house, ***so you won't have to evacuate and clog up the road***," Butler said."[8] (Emphasis added)

The Alliance has already brought this information to your attention. We asked you whether Chief Butler was authorized to speak for the CDF in this forum, but we have not heard if this was the case. Regardless of whether he was authorized to speak for the CDF or not, we believe these comments demonstrate an unreasonable, unrealistic and unscientific attitude by a CDF official to a local fire protection problem. An attitude that is matched measure for measure with the written and spoken words of Ramona Fire Marshal Steve Delgadillo. For example, the wording of the fire marshal's letter in which he does not require a secondary access road to the project is a strange piece of work. In that letter he writes:

"5. The project as it stands would have only the direct or cumulative impact that adding an additional 800 people to any departments (sic) response area would have for the time that they are there. If any additional mitigation were to be asked for it would be in the form of a secondary access into the property."[9]

On the surface it may appear that Fire Marshal Delgadillo cannot write grammatically correct English. However, the Alliance believes that there is a good reason for the lack of clear language. This key paragraph seemingly leaves open the opportunity for a secondary access road to be required while having the overall effect of potentially stifling community complaints that no access road is required now. Yet, interestingly, the Salvation Army has already spent, according to their own words, upwards to a half million dollars on project processing and is prepared to eventually spend millions of dollars more to complete this project without knowing if a secondary access road will be required. We wonder why the Salvation Army is comfortable with this situation unless they felt assured that no secondary access would ever be required.

We would also like to bring to your attention another example of what we consider to be the intentional confusion caused by the fire marshal's written comments concerning this project. In his letter written to CDF Chief James Garrett regarding the "sheltering in place" strategy vis a vis Salvation Army project, he states:

[6] Delgadillo August 10, 2000 Letter to Chief Garrett
[7] Ramona Sentinel, October 11, 2001, p. A2, continuation from p. A1
[8] Ibid.
[9] Delgadillo April 12, 2000 Letter to BRG Consulting

"The San Diego Fire Chiefs Association along with many other fire agencies in the western United States are (sic) making recommendations for what is know as sheltering in place. This is a viable option for the Salvation Army Camp with the amount of fire protection that will be provided if this project is ever completed. It must be understood that it may not be the only option used in the event of an emergency."[10]

Once again, the fire marshal leaves crucial information out of the equation. From this letter we have no idea of what other options he believes exist. As we have pointed out, the Salvation Army does not have adequate parking in their plan to move the 780 people the complex will be built to accommodate. Yet, we can see with this statement that the fire marshal may be hedging his bets. He may also believe the "sheltering in place" strategy is insufficient. However, without stated and realistic options to the strategy he suggests, the Alliance is convinced that the CDF and the Salvation Army will rely on the use of "sheltering in place". This reliance would ultimately then lead to an emergency response nightmare, disastrous consequences for hundreds of potential victims being "sheltered", and the reckless endangerment of hundreds more of Mussey Grade Road residents trying to escape the area.

While there appears to be no official recommendation by the fire marshal or any other CDF personnel of the "sheltering in place" strategy for the Salvation Army project, the strategy has been repeatedly invoked in public and private meetings either by the fire marshal or other CDF personnel.[11] And it is apparent to the Alliance that the fire marshall may continue to rely on the statement contained in the Ramona Municipal Water District materials for the August 22, 2000 meeting that there are no fire code requirements related to large-scale facility evacuations.[12]

The fire issue concerning this project was discussed at the August 22nd meeting after the Alliance insisted on raising it before the board. Fire Marshal Delgadillo and Chief Garrett attended and justified the decision to not require a secondary access road using the "sheltering in place" strategy. The water board deferred to the CDF opinion concerning the matter. Yet, the bare fact of no requirements to evacuate large-scale facilities, if this is indeed true, does not automatically absolve the fire marshal from the duty he has to review projects with an eye to the fire safety of all concerned. Moreover, the Alliance's confidence in the fire marshal and CDF itself would be even more damaged than it already is if we were to learn that the department, while using the "sheltering in place" strategy publicly and unofficially, has purposefully ignored the life-threatening danger presented by this project and thereby sought to absolve the department of the responsibility to make an official "sheltering in place" recommendation.[13]

[10] Delgadillo August 10, 2000 Letter to Chief Garrett

[11] These meetings include the August 22, 2000 meeting of the Ramona Municipal Water District (RMWD), October 4, 2001 meeting of the Ramona Community Planning Group (RCPG), and the meeting of nine Mussey Grade Road Alliance members with you on November 20, 2001 in your offices.

[12] Ramona Municipal Water District "Agenda Memo, Regular Board Meeting of August 22, 2000, Item D.1.- 2.

[13] Efforts of another kind on behalf of the Ramona fire marshal to confuse responsibility for the Salvation Army project are evident in the Delgadillo August 10, 2000 letter to his then-superior Chief James Garrett, where he states in the last line of the letter: "It should also be noted that a big portion of the property that the Salvation Army owns in that area is out of the District and under the control of the County." As a result of being contacted by the Alliance, County Fire Code Specialist Cliff Hunter wrote a letter to DPLU recommending annexation into the Ramona Municipal Fire District of the 280 acres presently within the County jurisdiction (letter attached). The suggestion implicit in the fire marshal's written statement is that jurisdictional responsibility issues were unclear. This statement appears to the Alliance to be a bald attempt to avoid serious problems with the project, especially because the suggestion is contained in the same letter in which Delgadillo recommends the "sheltering in place" strategy.

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Attachment

According to the Salvation Army,[14] the facility presently serves as a children's camp from mid-June to mid-August and as a rental facility during the other nine months of the year. Potentially, the expanded conference complex could attract tens of thousands of persons to the Mussey Grade Road canyon in one calendar year. Located in a rugged, mountainous and pristine wildland setting with the natural features of Iron Mountain in Poway to its west and the largely unspoiled Mussey Grade canyon to its east and south and north, the complex would be surrounded by thousands of acres of California sagebrush and other highly inflammable native plants.

The Specific Plan describes emergency fire procedures as follows:

> **"In the event of a fire or other emergency, the camp has a formal emergency plan that is posted in buildings throughout the camp. Education on the emergency procedure is provided to all staff during the week-long orientation that occurs each year. In the event of a fire or other emergency, campers and staff are alerted via the honking of horns and the use of megaphones. Upon issuance of this signal, staff gather (sic) campers and congregate (sic) into a central large, grassy field on the camp where they await other directions from the proper authority, depending on the nature and type of emergency."** [15]

This response is totally inadequate on its face. It reflects a devastating lack of knowledge concerning wildland fires. Worse, this response follows the CDF lead in initially recommending the strategy of "sheltering in place". For our part, the Alliance cannot rationally envision hundreds of people, including hundreds of terrified children, standing in a field surrounded by a fast moving wildland fire, showered by burning embers and inundated with smoke, as a realistic or reasonable option to evacuation. We believe this is negligence, pure and simple.

What would happen if there was a major fire and the "sheltering in place" strategy fails, as we expect it to do? Who would be liable for the serious injuries and possible wrongful deaths of people trapped in a wildland fire? An even more basic question is, who would take care of hundreds of injured people? There is no hospital in Ramona and no medical emergency services are based in this unincorporated town in the County of San Diego, except for medical assistance provided by CDF.[16]

Even Fire Marshal Delgadillo recognizes this problem when he states, "No automatic aid is relied upon for this area in the initial stages."[17] Yet, in another letter regarding another project, he also states, "The experts tell us that the critical time for a medical response is within the first 4 to 6 minutes."[18] In light of these facts, we ask you

[14] Specific Plan, p. 10, under "Existing Operation Characteristics"

[15] Specific Plan, pp. 41-42, under "Fire Protection"

[16] Delgadillo April 12, 2000 Letter to BRG Consulting

[17] Ibid.

[18] Delgadillo November 30, 2001 Letter to DPLU regarding the Monte Vista Ranch project

to remember that the Salvation Army's project is a huge project, both in actual physical size (over 200,000 square feet of building according to the Specific Plan)[19] and the numbers of people to be accommodated (780)/day). In fact, this project is the largest project of its kind ever to come before the Ramona Community Planning Group. Nevertheless, most medical assistance in the event of a major catastrophe would have to come from outside Ramona, taking up precious time in travelling to the potentially hundreds of people in need.

There is another aspect to the problem that should be considered. The Alliance believes that in the event of a wildfire during which a "sheltering in place" strategy is used, CDF would apply the greatest resources to protecting the visitors to the complex, thus diverting these resources away from the protection of our property. Faced with protecting lives or property, the CDF would naturally choose to protect lives. This is the false dilemma set up by relying on a "sheltering in place" strategy, which could also result in the unnecessary, destruction of millions of dollars of property.

The Mussey Grade Road corridor is known by CDF personnel to be a dangerous wildfire area.[20] Once again we draw your attention to the fact that it is a box canyon. The road dead ends in the San Vincente Reservoir and is the only road in and out of the canyon. The canyon is populated by highly hazardous natural flora. Hundreds of people live along the road and the side roads in the area. Curiously, however, no map in the 82-page Specific Plan shows the road. Instead, the Specific Plan goes to great lengths not to show the road. The single map of the general area provided at p. 2, does not show Mussey Grade Road at all![21] This map must be the only map in the universe that does not show the road on which we live.

There is no dispute that fires have occurred here in the past and will occur in the future. Knowing this to be true, the Alliance considers the Salvation Army Camp and Conference Center a fire hazard right now. The addition of 165 people[22] during the most dangerous part of the year -- the hot Ramona summer -- people who are unfamiliar with wildland fire risks and are without adequate transportation available in case of fire, without a secondary access road, without adequate fire flow, without adequate prevention and response strategies[23], and, finally, without adequate and reasonable fire protection provided by the CDF, **endangers us now.**

This last point is crucial. You were informed during our meeting that the CDF routinely shuts down Fire Station 82 on Dye Road and moves its fire engine to the Air Attack Base at the county-owned Ramona Airport to provide legal cover for the U.S.

[19] Total derived from all square footage within Specific Plan; actual total = 218,000 square feet
[20] CDF personnel visiting the area last year near my home, when asked why they were there, said the visit was for the purpose of showing the area to new recruits as this area is widely known to have only one road in and out and is populated by a decades-old accumulation of coastal sage and chaparral.
[21] Specific Plan, Figure 1, p. 2
[22] Specific Plan, p. 10, under "Existing Operational Characteristics"
[23] Specific Plan, pp. 41-42, quoted above. The Salvation Army's proposed prevention/response to a wildfire emergency in the future with many hundreds of people on site would not reasonably be less rigorous than their present prevention/response efforts. As the Specific Plan response to a wildland fire is on its face inadequate, it is reasonable to assume that the Salvation Army's present preparedness is even more inadequate.

JF
Attachment

Forrest Service when air tankers are operating.[24] This is done even though the equipment is improper equipment to combat an aircraft fire. Station 82 is the local fire station responsible for our fire protection. Therefore, our community subsidizes air tanker operations whenever this truck is assigned to the airport to satisfy a Federal Aviation Administration legal requirement for fire protection. A conflict of interest exists between the CDF's responsibility to the community and the CDF's responsibility to the state. Faced with this conflict of interest, the CDF is making a conscious decision to compromise our fire protection and to say it is expendable when it comes to making a choice between the two.

The removal of our fire protection multiplies the risk of a wildland fire disaster along Mussey Grade Road. Consequently, in conjunction with CDF policies that are already degrading our community's fire-fighting resources, we believe the addition of some 800 people in a facility lacking a secondary access road will materially endanger our lives. We view the decision of the CDF Fire Marshal Steve Delgadillo to approve this project without a secondary access road as a direct and grave threat to us. We also view his decision as even more alarming due to our perception that he is not using a fair and uniform standard on which to base his decisions concerning projects that come before him, and all projects in the Ramona Community Planning Group Area do come before him.

We previously wrote to you about our concerns over his decision to require a secondary access road in the case of the proposed Monte Vista Ranch housing development, but to not require a secondary access road in the case of the Salvation Army complex. Our October 18, 2001 letter regarding this matter is included in the attachments. Nothing that was said during our 2-hour discussion with you, Chief Charles Maner and Fire Marshal Delgadillo on November 20th dispelled our perception that, as between these two projects, a double standard is being employed by the fire marshal in his assessment of fire safety and protection considerations.

Finally, there is some discussion in the Salvation Army's Specific Plan concerning interior roads within the complex including a discussion regarding circulation: "Primary ingress/egress to the site would continue to be provided via the existing entry and main dirt access road off of Mussey Grade Road."[25] (Emphasis added) The Specific Plan also mentions other roads and states: "There are three access roads onsite that lead to Mussey Grade Road and can be used during an emergency evacuation…"[26] Consequently, in the event of a fire emergency all traffic would be directed Mussey Grade Road, creating multiple bottlenecks for evacuees trying to travel north on the road out of the canyon. Therefore, it is clear that **the secondary access road to this complex, which is necessary for the safety of all concerned, must not exit onto Mussey Grade Road;** otherwise it would create the same problem.

As promised, we are providing you with some additional documentation other than that provided previously in our letters to you of October 18th and October 29th, 2001.

Please find attached: 1) August 10, 2001 letter from Ramona Fire Marshal Steve Delgadillo to his then CDF superior CDF Battalion Chief James Garrett, which you may

[24] Based on information of retired CDF Captain Art Bale
[25] Specific Plan, p. 37
[26] Specific Plan, p. 53, and located under the "Public Safety Element"

not have seen, concerning his written comments regarding the 'sheltering in place" strategy; 2) December 13, 2001 letter from County of San Diego Fire Code Specialist Cliff Hunter recommending annexing 280 acres of the project's property into the Ramona fire district; 3) Ramona Sentinel article quoting Chief Butler regarding the "sheltering in place" strategy during the Ramona Community Planning Group (RCPG) discussion of the Salvation Army project in October 2001. The RCPG subsequently voted against the project at this meeting; 4) April 12, 2000 letter from CDF Ramona Fire Marshal Steve Delgadillo excusing the Army from any secondary access road requirement prior to the project's completion; 5) Sections 409 and 409.5; 6) October 18, 2001 letter from the Mussey Grade Road Alliance to Chief Ken Miller concerning the November 30, 2000 letter from Fire Marshal Steve Delgadillo requiring a secondary access road for Monte Vista Ranch; 7) selected pages of the Salvation Army's Specific Plan submitted to the DPLU in August 2001 (a full copy can be secured from the DPLU); 8) October 8, 2001 DPLU letter, pp. 1, 4, 5, raising the fire issue to the level controversy in the Environmental Impact Report (EIR) process; 9) copy of Thomas Bros. map showing Mussey Grade Road and its dead end into San Vincente Reservoir; 10) Salvation Army Specific Plan map, p. 2, Figure 1, from which Mussey Grade Road has been eliminated; and, 11) Ramona Municipal Water District, Agenda Memo, August 22, 2000, Item D.1.-2.

Immediately following our November 20th meeting we agreed that you would delay your decision regarding this matter until January 2002, and that we would provide you by letter with additional documentation. Unfortunately, it has taken more time than planned to respond to you. Nevertheless, we do so now with the expectation that you have had adequate time to consider the matter, including the numerous questions we presented to you, since November 20, 2001. Therefore, we request that you respond to this appeal within 30 days.

We want to remind you that the Ramona Community Planning Group has voted this project down twice, most recently in October 2001. The planning group cited fire hazards as one of its major concerns. The County of San Diego Department of Planning and Land Use (DPLU) has elevated fire safety to the level of controversy in the ongoing Environmental Impact Report (EIR) process for this project.[27]

Once again, we ask you to reverse the decision of CDF Fire Marshal Steve Delgadillo permitting this project to go forward without requiring a secondary access road. We ask you to require the Salvation Army to secure a secondary access road exiting onto a road other than Mussey Grade Road before proceeding with the project planning and the execution of any of its planned phases. We ask that you make this decision in order to protect the safety and security of both the visitors to the complex and the residents of the Mussey Grade Road community. We look forward to receiving the results of your decision, which should be mailed to the address given above.

Sincerely,

Diane Conklin

Diane Conklin
Spokesperson

[27] DPLU October 8, 2001 Letter to Salvation Army, p. 5

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Attachment

Attachments (11)

cc: w/attachments
Supervisor Dianne Jacob, Second District, County of San Diego
Chief Fred Batchelor, Assistant Region Chief - Operations, Riverside County
Office of the Governor, State of California

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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

RICHARD AND SUSAN CARY ON BEHALF OF THEMSELVES AND ALL OTHERS SIMILARLY SITUATED WHO SUSTAINED DAMAGE TO A PROPERTY INTEREST AS A RESULT OF THE CEDAR FIRE, INCLUDING BUT NOT LIMITED TO DIANE KNUEFFER, CARL AND KATHERINE SCHWEIKERT, DAVID SOUTHCOTT, JAMES HERZOG, PATRICIA GEERTS, JANET MARIE PRIAATT, SHARON HENRY, DONA SCHNEIDER, MARY CAROL WILDER, DOUGLAS SCHWAEBE, ROBERT S. MARTIN, PATRICIA MARTIN, PLAINTIFFS, vs. SAN DIEGO COUNTY, and THE STATE BOARD OF CONTROL dba THE CALIFORNIA DEPARTMENT OF FORESTRY, and DOES 1 though 25, Inclusive, Defendants.	Case No. **COMPLAINT FOR PROPERTY DAMAGE**

NOW COMES PLAINTIFFS RICHARD AND SUSAN CAREY ON BEHALF OF THEMSELVES AND ALL OTHERS SIMILARLY SITUATED WHO SUSTAINED DAMAGE TO A PROPERTY INTEREST AS A RESULT OF THE CEDAR FIRE, INCLUDING BUT NOT LIMITED TO DIANE KNUEFFER, CARL AND KATHERINE SCHWEIKERT, DAVID SOUTHCOTT, JAMES HERZOG, PATRICIA GEERTS, JANET MARIE PRIAATT, SHARON HENRY, DONA SCHNEIDER, MARY CAROL WILDER, DOUGLAS SCHWAEBE, ROBERT S. MARTIN, PATRICIA MARTIN (hereinafter "Plaintiffs") by and through its attorneys GROTEFELD & DENENBERG, L.L.P. and for its Complaint against all named Defendants and DOES 1 through 25, and each of them, and alleges that at all pertinent times herein on information and belief as follows:

I. INTRODUCTION

This lawsuit, stemming from the Cedar Fire of October 2003, seeks redress for the named Plaintiffs (and the Class they represent) whose property interests were either damaged or destroyed during this catastrophic event. No claim is asserted in this Complaint suggesting that the actions of the firefighters who timely responded to the call to fight the Cedar Fire in any way caused or permitted the damage to Plaintiffs' property. What is asserted in this case are real concerns related to the safety and welfare of property interests held by citizens in and about San Diego County, California. This lawsuit calls into question the actions taken by San Diego County and the State of California officials, actions that were tantamount to gross malfeasance in the Government's failure to organize, staff and dispatch firefighting personnel and assets at the early stages of the Cedar Fire. The callous indifference exhibited by Government officials in providing for the public's welfare needlessly permitted a highly dangerous fire scenario to develop and placed homes and other structures in and about San Diego County in harms way of a most avoidable conflagration.

II. PARTIES

A. Plaintiffs

1. At all relevant times herein, Richard and Susan Cary owned the real and personal property located at 16725 Harrison Park Trail, Julian, California.

2. At all relevant times herein, Diane Knueffer owned the real and personal property located at 30 Twin Oaks Road, Julian, California.

3. At all relevant times herein, Carl and Katherine Schweikert owned the real and personal property located at 16952 Iron Springs Road, Julian, California.

4. At all relevant times herein, David Southcott owned the real and personal property located at 17264 Iron Springs Road, Julian, California.

5. At all relevant times herein, James Herzog owned the real and personal property located at 30 Twin Oaks Road, Julian, California.

6. At all relevant times herein, Patricia Geerts owned the real and personal property located at 14805 Mussey Grade Road, Ramona, California.

7. At all relevant times herein, Janet Marie Priaatt owned the real and personal property located at 13835 Fernbrook Drive, Ramona, California.

8. At all relevant times herein, Sharon Henry owned the real and personal property located at 1383 Fernbrook Drive, Ramona, California.

9. At all relevant times herein, Dona Schneider owned the real and personal property located at 14062 Fernbrook Drive, Ramona, California.

10. At all relevant times herein, Mary Carol Wilder owned the real and personal property located at 14110 Fernbrook Drive, Ramona, California.

11. At all relevant times herein, Douglas Schwaebe owned the real and personal property located at 13150 Genesis Way, Lakeside, California.

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12. At all relevant times herein, Robert S. Martin owned the real and personal property located at North Peak, Cuyamaca, Julian, California. APN No.'s: 1) 294-160-22-00; 2) 294-160-26-00; 3) 293-180-30-00; 4) 293-180-34-00; 5) 293-180-58-00; 6) 293-180-59-00; 7) 293-180-60-00; 8) 293-180-63-00; and 9) 293-180-64-00.

13. At all relevant times herein, Patricia Martin owned the real and personal property located at North Peak, Cuyamaca, Julian, California. APN No.: 294-160-23-00.

14. Plaintiffs' real and/ or personal property was damaged and/or destroyed during the Cedar Fire that occurred on or about October 25, 2003 and originated in and around the Cleveland National Forest located in San Diego, California.

B. Defendants

15. Plaintiffs are informed and believe that at all relevant times herein, Defendant SAN DIEGO COUNTY (hereinafter "S.D. COUNTY") is a public entity duly organized and existing under and by virtue of the laws of the State of California.

16. Plaintiffs are informed and believe that at all pertinent times herein, Defendant STATE BOARD OF CONTROL dba CALIFORNIA DEPARTMENT OF FORESTRY (hereinafter "C.D.F.") is a public entity duly organized and existing under and by virtue of the laws of the State of California.

17. At all pertinent times herein, Defendants were in the business of and/or were responsible for maintaining, supervising, managing and generally conducting Emergency Response and Fire Department operations and personnel in and around San Diego County.

18. Upon information and belief, Defendants were responsible for the maintenance, supervision and management of fire abatement, control and suppression activities in and around San Diego County.

19. Defendant DOES One (1) through Twenty-Five (25), inclusive, are unknown to Plaintiffs who therefore sue said Defendants by such fictitious names. Plaintiffs are informed and believe and thereon allege that each of the Defendants designated herein as DOE is legally responsible in some manner for the events and happenings referred to herein. Plaintiffs will ask leave to amend this Complaint when the true names and capacities of Defendants sued as DOES One (1) through Twenty-Five (25) are ascertained.

20. Plaintiffs are informed and believe, and on the basis of that information and belief allege, that at all times mentioned in this complaint, Defendants were the agents and employees of their co-Defendants, and in doing the things alleged in this complaint were acting within the course and scope of that agency and employment.

III. RELEVANT CONSTITUTIONAL PROVISIONS AND STATUTES,

21. **California Constitution, Article 1, Section 19 entitled "Eminent Domain; Just Compensation; Possession"** states in relevant part:

> "Sec. 19. Private property may be taken or damaged for public use only when just compensation, ascertained by a jury unless waived, has first been paid to, or into court for, the owner. The Legislature may provide for possession by the condemnor following commencement of eminent domain proceedings upon deposit in court and prompt release to the owner of money determined by the court to be the probable amount of just compensation."

IV. GENERAL ALLEGATIONS

A. The Cleveland National Forest

22. The Cleveland National Forest consists of 460,000 acres of varying terrain and is the southern-most National Forest in the State of California. It is located just north of Mexico and east of the City of San Diego. The forest is located within the California Floristic Province.

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23. The Cleveland National Forest's western boundary varies in distance along its length from 10 to 30 miles from the Pacific coast. The forest extends from within 5 miles of the border with Mexico northward approximately 130 miles to Orange and Riverside counties.

24. The Cleveland National Forest borders San Diego's greater metropolitan area and abuts various cities and townships including those of Julian, Ramona, Harrison Park and Alpine.

25. At all times relevant to this proceeding, The Cleveland National Forest's wilderness area had been given an "extreme" Fire Danger Zone designation by the State of California. This designation, based in part upon related weather and vegetation conditions, alerted both S.D. County and C.D.F. to the danger of even the smallest fire growing out of control if not extinguished at its outset.

B. The Cedar Fire

26. Between 4:00 and 4:30 p.m. on October 25, 2003 a small signal fire, believed to have been started by a lost hunter in the Cleveland National Forest, was first observed and reported to the Defendants by citizens through emergency 911 telephone calls to the S.D. County Sheriff's Department and the California Highway Patrol.

27. At the time the fire was reported, the sun was shining, wind speeds were light and visibility was clear. Daylight conditions remained for the better part of two hours and the light wind speeds did not measurably increase until close to 12:00 a.m. on October 26, 2003. Early eyewitness accounts of the fire reveal that a vertical plume of smoke emanated from what was then a small fire that encompassed approximately one acre of land.

28. Situated roughly five miles from the fire's point of origin was the Ramona Air Attack Base, which is operated by the C.D.F. and the United States Department of Agriculture Forest Service. At the Ramona Air Attack Base, several fixed wing airplanes and/or air tankers

specifically designated to provide air attack upon a fire of this nature sat and remained idle for the remainder of the daylight hours on October 25, 2003.

29. Upon information and belief the pilots assigned to the above-described fixed wing airplanes had left the Ramona Air Attack Base prior to dusk, and failed to return to the base when paged prior to nightfall setting in.

30. Representatives of the C.D.F. have publicly stated that these air tankers, if deployed, would have been over the fire scene within eight minutes and would have had the capability of providing enough chemical fire retardant to have eliminated the fire all together, or at the very least, have kept the fire controlled and maintained within its area of origin.

31. Sightings of the fire continued to occur after 4:30 p.m. on the afternoon of October 25, 2003 by additional residents who also called 911 either on their cell phones or via landline telephones. These sightings, in addition to the ones previously described, were reported to the Defendants by residents in and near the Cleveland National Forest area between the hours of 4:30 p.m. and 5:30 p.m.

32. Between the hours of 4:30 p.m. and 5:30 p.m., callers who reported the fire to emergency 911 personnel were told that officials were already well aware of the fire's existence, appropriate firefighting personnel had been dispatched, and that there was no cause for alarm. Some individuals were even instructed to discontinue calling 911 and were provided with a non-emergency number to call if they felt compelled to continue to call about the fire.

33. Of concern to some residents who first spotted the fire, and who were also veterans of prior fires, was the fact that there was no observable air support. This lack of air support was inconsistent with what these residents had seen in prior circumstances where fires had occurred within the immediate area.

34. At approximately 5:40 p.m. a S.D. County Sheriff's helicopter picked up the lost hunter within close proximity to fire's point of origin. The helicopter pilot radioed for an additional helicopter to come and drop water on the fire as no air support had reached the fire's origin by that time. That second S.D. Sheriff's Department helicopter containing firefighting apparatus was en route and within minutes of the point of origin of the Cedar Fire when it was called off its mission by the C.D.F.

35. Subsequent "official" reports issued after the fire by S.D. County and the C.D.F. suggested that the second helicopter, en route with firefighting apparatus, was called off because it was flying after the time period in which guidelines permitted flight operations. Upon information and belief, these "official" reports were patently false, as air support guidelines specifically permit flight operations until 30 minutes after sunset. Sunset on October 25, 2003 occurred at 6:07 p.m., roughly 25 minutes after this second helicopter, carrying water to what was then a small signal fire, was called off by C.D.F.

36. Beginning at the time that C.D.F. and S.D. County were first notified by citizens of the fire's existence and location, there was a complete and utter disregard for the public's welfare by officials of these governmental bodies. Instead of focusing on the task at hand (fighting the fire) officials for C.D.F. and S.D. County wrestled over who was to be in charge of these operations. The lack of interagency coordination by government officials from C.D.F and S. D. County who held the responsibility to appropriately organize and dispatch appropriate firefighting personnel and assets at the incipient stage of the Cedar Fire resulted in their collectively losing their sole opportunity to extinguish the Cedar Fire.

C. The Aftermath

37. Over the next five days the Cedar Fire burned over 273,000 acres, destroyed 2,232 residences, 22 commercial structures and 566 outbuildings.

38. Since no organized and measured firefighting effort was put forth at first notice of the Cedar Fire, officials overseeing such operations at S.D. County and the C.D.F. lost the ability to control a small signal fire, and through their gross malfeasance permitted this fire to grow into a wildfire of epic proportions.

39. The gross malfeasance of operations personnel and officials at both C.D.F. and S.D. County in not timely alerting crews to respond to the fire and/or failing to coordinate the deployment of assets in a timely and efficient manner, including Ramona Air Attack Base and S.D. County helicopter crews, needlessly lead to thousands of property owners suffering extensive damage and destruction to their property, in an amount well in excess of One Hundred Million Dollars ($100,000,000.00).

40. On or about April 21, 2004, Plaintiffs filed claims with San Diego County and the California State Board of Control with respect to the aforementioned fire in accordance with Gov. Code §910 et seq. on behalf of themselves and others similarly situated.

V. CLASS ACTION ALLEGATIONS

41. Plaintiffs bring this action as a class action on behalf of all individuals (hereinafter "CLASS") who suffered damage to real and personal property as a result of the Cedar Fire spread. Excluded from the CLASS are the Defendants and their subsidiaries, successors, predecessors, officers and directors, any entity in which any of Defendants have controlling interest, and the legal representatives, successors or assigns of any such excluded person or entity.

42. This cause is brought as a class action pursuant to Civil Code §1781 and/ or Code of Civil Procedure §382. This class action satisfies the numerosity, typicality, adequacy, commonality, predominance and superiority requirements of those statutory provisions.

43. The CLASS is so numerous that the individual joinder of all of its members is

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impracticable. While the exact number and identities of all CLASS members are unknown to Plaintiffs at this time and can only be ascertained through appropriate discovery, Plaintiffs are informed and believe that the CLASS includes thousands of persons as the Cedar Fire affected over 2,000 residences.

44. Common questions of law and fact exist as to all CLASS members that predominate over any questions affecting only individual members. These common legal and factual questions which do not vary from CLASS member to member and which may be determined without reference to individual circumstances of any CLASS member include, but are not limited to the following:

a. Whether the Cedar Fire should have been extinguished at its incipient stage

b. Whether the C.D.F. and S.D. COUNTY were grossly negligent when breaching their duty owed to the residents of San Diego with respect to organization, management and response to the Cedar Fire

c. Whether C.D.F. was grossly negligent in abandoning the Ramona Air Attack Base during daylight hours of October 25, 2003 given that it knew fire conditions on that date had been designated "extreme."

d. Whether S.D. COUNTY'S failure to timely and properly dispatch emergency response personnel in order to contain the Cedar Fire before it spread to Plaintiffs property resulted in damage and/or a "taking" of Plaintiffs property without just compensation.

e. Whether the C.D.F.'s failure to contain the Cedar Fire and/or prevent its spread resulted in damages and/or a "taking" of Plaintiff's property without just compensation.

45. Plaintiffs' claims are typical of the claims of the CLASS, and Plaintiffs' interests are coincident with and not antagonistic to those of the CLASS they seek to represent. Plaintiffs and the members of the CLASS have sustained damages and faced irreparable harm arising out of Defendants' common course of conduct, as complained of herein. The harm sustained by each member of the CLASS was caused directly by Defendants' wrongful conduct, as alleged herein.

46. Plaintiffs will fairly and adequately protect the interests of the members of the CLASS. Plaintiffs have retained attorneys who are experienced in the prosecution of property damage actions, and Plaintiffs intend to prosecute this action vigorously.

47. A class action is superior to other available methods for the fair and efficient adjudication of this controversy, because individual litigation of the claims of all CLASS members is impracticable. Even if every CLASS member could afford individual litigation, the court system could not. It would be unduly burdensome on the courts in which individual litigation of numerous cases would proceed. Individual litigation would also present the potential for varying, inconsistent or contradictory judgments and would magnify the delay and expense to all parties and to the court system resulting from multiple trials of the same complex factual issues. By contrast, the conduct of this action as a class action with respect to some or all of the issues presented herein, presents fewer management difficulties, conserves the resources of the parties and of the court system and protects the rights of each CLASS member.

48. Individual actions by CLASS members may create a risk of adjudications with respect to them that would, as a practical matter, be dispositive of the interest of other CLASS members not parties to such adjudications, or that would substantially impair or impede the ability of such non-party CLASS members to protect their interests.

49. Defendants have acted or refused to act in respects generally applicable to the

CLASS thereby making appropriate relief with regard to the members of the CLASS as a whole, as requested herein.

FIRST CAUSE OF ACTION

(Negligence by Plaintiffs against Defendant

S.D. COUNTY and DOES 1 through 25, inclusive)

50. Plaintiffs incorporate by reference paragraphs 1 though 49 of this Complaint as though fully set forth herein.

51. Plaintiffs are informed and believe, and on the basis of that information and belief allege, that all times mentioned in this Complaint, Defendant DOES One (1) through Twenty-Five (25), inclusive, were the agents and employees of S.D. COUNTY, and in doing the things alleged in this FIRST CAUSE OF ACTION were acting within the course and scope of that agency and employment.

52. At all times material herein, it was the duty of Defendant S.D. COUNTY, and Does 1 through 25, inclusive, through their agents and employees, acting in the scope of their employment, to use due care and caution for the safety of Plaintiffs, to take reasonable precautions for the protection of Plaintiffs' property, and Defendants were under a further duty to observe and obey the requirements of the law, duties of the common law, and the State of California.

53. In accordance with the applicable laws and regulations governing fire abatement, protection and suppression and emergency response Defendant S.D. COUNTY and DOES 1 through 25, and each of them, owed the Plaintiffs a duty to prevent and/or guard against the risk of fire and fire spread and had a duty to ensure that proper safety procedures were followed so as to prevent fires and fire spread such as this subject loss from occurring.

54. These duties included ensuring that emergency response systems and dispatch

were operating properly and that such fire operations were conducted in a reasonable manner for the safety of the public from the danger and/or damage associated with the Cedar Fire and its spread.

55. It was foreseeable to Defendant S.D. COUNTY and DOES 1 through 25, and each of them, that the failure to properly dispatch emergency personnel in a timely and appropriate could result in the fire spread and consequently damages such as suffered by Plaintiffs.

56. Defendant S.D. COUNTY and DOES 1 through 25, and each of them, negligently and carelessly breached their duty to prevent and/or guard against the risk of fire and fire spread by failing to properly dispatch emergency response personnel in a timely and reasonable manner so as to contain the initial fire before it spread to surrounding areas, specifically to Plaintiffs' property.

57. The breach of said duties constitutes gross negligence on the part of S.D. County and DOES 1 through 25 and proximately caused a fire to occur at Plaintiff's residence and the residences of others similarly situated and resulted in the damages as set forth herein.

SECOND CAUSE OF ACTION

(Negligence by all Plaintiffs against Defendant C.D.F. and DOES 1 through 25, inclusive)

58. Plaintiffs incorporate by reference paragraphs 1 through 57 of this Complaint as though fully set forth herein.

59. Plaintiffs are informed and believe, and on the basis of that information and belief allege, that all times mentioned in this Complaint, Defendant DOES One (1) through Twenty-Five (25), inclusive, were the agents and employees of C.D.F., and in doing the things alleged in

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Attachment

this SECOND CAUSE OF ACTION were acting within the course and scope of that agency and employment.

60. At all times material herein, it was the duty of Defendant C.D.F., and Does 1 though 25, inclusive, through their agents and employees, acting in the scope of their employment, to use due care and caution for the safety of Plaintiffs, to take reasonable precautions for the protection of Plaintiffs' property, and Defendants were under a further duty to observe and obey the requirements of the law, duties of the common law, and the State of California.

61. In accordance with the applicable laws and regulations governing fire abatement, protection and suppression and emergency response Defendant C.D.F. and DOES 1 through 25, and each of them, owed the Plaintiffs a duty to prevent and/or guard against the risk of fire and fire spread and had a duty to ensure that proper safety procedures were followed so as to prevent fires and fire spread such as this subject loss from occurring.

62. These duties included ensuring that the Ramona Air Attack Base was manned and operated at all appropriate times with sufficient flight crews and other personnel, that emergency response systems and dispatch were operating properly and that such fire operations were conducted in a reasonable manner to ensure for the safety of the public from danger and damage associated with the fire and fire spread.

63. It was foreseeable to Defendant C.D.F. and DOES 1 through 25, and each of them, that the failure to adequately prevent and/or guard against the risk of fire and fire spread could result in damages such as suffered by Plaintiffs.

64. Defendant C.D.F. and DOES 1 through 25, and each of them, negligently and carelessly breached their duty to prevent and/or guard against the risk of fire and fire spread by failing to properly staff the Ramona Air Attack Base and failing to properly dispatch firefighting

aircraft to eliminate or contain the initial fire before it spread to surrounding areas, specifically Plaintiffs' property.

65. The breach of said duties constitutes gross negligence on the part of C.D.F. and DOES 1 through 15 and proximately caused a fire to occur at Plaintiff's residence and the residences of others similarly situated and resulted in the damages as set forth herein.

THIRD CAUSE OF ACTION

(Inverse Condemnation by all Plaintiffs against Defendant

S.D. COUNTY and DOES 1 through 25, inclusive)

66. Plaintiffs incorporate by reference paragraphs 1 through 65 of this Complaint as though fully set forth herein.

67. Plaintiffs are informed and believe, and on the basis of that information and belief allege, that all times mentioned in this Complaint, Defendant DOES One (1) through Twenty-Five (25), inclusive, were the agents and employees of S.D. COUNTY, and in doing the things alleged in this THIRD CAUSE OF ACTION were acting within the course and scope of that agency and employment.

68. At all times relevant herein, S.D. COUNTY was responsible for ensuring that 911 calls were properly dispatched so that emergency response personnel could timely and reasonably respond to the Cedar Fire thereby preventing its spread onto Plaintiffs' property.

69. S.D. COUNTY failed to timely and properly dispatch emergency response personnel to the area where the Cedar Fire originated within the Cleveland National Forest.

70. The failure of S.D. COUNTY to timely dispatch emergency response personnel to The Cleveland National Forest directly and proximately resulted in damage and/or an effective "taking" of Plaintiffs' property.

JF
Attachment

71. The damage and/or "taking" of Plaintiffs' property deprived Plaintiffs of the use and enjoyment of their property and otherwise resulted in additional damages without just compensation.

72. Pursuant to California Constitution, Article 1, Section 19, Plaintiffs are entitled to damages and by virtue of the type of misconduct alleged, Plaintiffs are entitled to an amount in excess of One Hundred Million Dollars ($100,000,000.00)

FOURTH CAUSE OF ACTION

(Inverse Condemnation by all Plaintiffs against Defendant

C.D.F. and DOES 1 through 25, inclusive)

73. Plaintiffs incorporate by reference paragraphs 1 through 72 of this Complaint as though fully set forth herein.

74. Plaintiffs are informed and believe, and on the basis of that information and belief allege, that all times mentioned in this Complaint, Defendant DOES One (1) through Twenty-Five (25), inclusive, were the agents and employees of C.D.F., and in doing the things alleged in this FOURTH CAUSE OF ACTION were acting within the course and scope of that agency and employment.

75. At all times relevant herein, C.D.F. was responsible for ensuring that air based fire protection locations were manned and operated at all times with sufficient firefighting personnel, that emergency response systems and dispatch were operating properly, specifically at the Ramona Air Attack Base and that such fire operations were conducted in a reasonable manner to ensure the safety of the public from danger and damage associated with the Cedar Fire and its spread.

76. The C.D.F. failed to properly staff the Ramona Air Attack Base and failed to properly dispatch firefighting aircraft to eliminate or contain the initial Cedar Fire before it spread to surrounding areas, specifically Plaintiffs' property.

77. The failure of the C.D.F. to timely dispatch emergency response personnel to the Cleveland National Forest directly and proximately resulted in damage and/or an effective "taking" of Plaintiffs' property.

78. The damage and/or "taking" of Plaintiffs' property deprived Plaintiffs of the use and enjoyment of their property and otherwise resulted in additional damages without just compensation.

79. Pursuant to California Constitution, Article 1, Section 19, Plaintiffs are entitled to damages and by virtue of the type of misconduct alleged, Plaintiffs are entitled to an amount in excess of One Hundred Million Dollars ($100,000,000.00)

WHEREFORE, Plaintiffs pray for judgment as set for herein.

WHEREFORE, Plaintiffs pray for judgment against all Defendants and each of them as set forth below.

1. For monetary damages in an amount to be proven at trial, which may exceed One Hundred Million Dollars ($100,000,000.00).

2. For prejudgment interest in accordance with California Civil Code section 3287;

3. For attorneys' fees and cost of suit; and

4. For such other relief as the Court deems just and proper.

Dated: December __, 2004 **GROTEFELD & DENENBERG, L.L.P.**

By:_____
Maura Walsh Ochoa
Attorneys for Plaintiffs

83813

MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

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Steering Committee:
Diane Conklin, Spokesperson
Carol Levin, Treasurer
Bruce Meador, Member
Donna Schneider, Member
Joseph Mitchell, Member

COMMUNITY CHARACTER CHAPTER

By Diane Conklin

COMMUNITY CHARACTER CHAPTER

By Diane Conklin

INTRODUCTION

The EIR addresses the issue of "community character" at paragraphs 2.7.2 (Thresholds of Significance); 2.7.3 (Analysis of Project Effects and Determination as to Significance); 2.7.3.1 (Land Use Compatibility/Community Character); 2.7.3.2 (Consistency with Applicable Land Use Plans and Policies), and 2.7.3.3 (Divide Established Community) (pages 2.7-2 to 2.7-3) JCC1

Paragraph 2.7.2 "Thresholds of Significance" states that under CEQA Guidelines Appendix G and the Ramona Community Plan, "a project would have a significant Land Use/Planning impact if it would:

- Cause land uses incompatible with exiting uses or character of the community (County of San Diego, 1995);
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect (State of California, 2002); or
- Physically divide an established community (State of California, 2002)."

The EIR at 2.7.2.does not list a fourth element under CEQA Guidelines Appendix G, which asks:

"Conflict with any applicable habitat conservation plan or natural community conservation plan?" This element is important with regard to the County of San Diego Multiple Species Conservation Program (MSCP), a plan which includes a portion of the land owned by the Army and large areas contiguous to the Army's property. The issue of potential conflict with the goals of the MSCP should be addressed in the revised version of the DEIR in this section on community character. Additionally, the entire area owned by the Army qualifies as a Biological Resource Core Area, which is also a characteristic of the larger community area surrounding the Army's facility. This fact should be addressed in terms of the undisturbed and biologically rich traits of the area and how a major expansion will affect or change the area.

The analysis/justification at 2.7.3 that the Army gives for the project, specifically under Land Use Compatibility/Community Character at 2.7.3.1(p. 2.7-2) is as follows: JCC2

"At full capacity the camp would accommodate a maximum of 748 people (i.e. users, staff and other support personnel). Similar to the existing facility, peak attendance is expected during the summer, when weekly summer youth camps are held. The types of

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005

Response to Comment JCC1:
The County does not concur with this comment. The CEQA Threshold of Significance referenced in this comment is evaluated in Final EIR Chapter 2.2 Biological Resources. This format follows Appendix G of the CEQA Guidelines, which lists this threshold under Biological Resources. Section 2.2.2 includes the County's impact threshold for compliance with an applicable habitat conservation plan or natural community conservation plan, which in this case is the County's MSCP, BMO and RPO – all of which include regulations designed to protect sensitive biological resources. The analysis of the project's compliance with these plans is adequately addressed, and appropriately located, in the Final EIR Chapter 2.2 Biological Resources.

Response to Comment JCC2:
The comment claims that the project is incompatible with the Mussey Grade Road neighborhood. The County disagrees with this claim because, as explained in the Final EIR, the project would not result in significant impacts to environmental factors related to community character, such as traffic, noise and aesthetics.

The Final EIR, Section 2.5.1 acknowledges the historic importance of Mussey Grade Road area and the Final EIR Section 2.5.3 evaluates the potential community character impacts to Mussey Grade Road. Implementation of the proposed project would not significantly impact the road or its historical importance. The traffic analysis concludes that the proposed project would not significantly impact the operations of Mussey Grade Road. No changes or alterations to Mussey Grade Road are proposed or associated with the project. Furthermore, the project site is not visible from Mussey Grade Road.

In addition, outdoor sound amplification will be prohibited, and implementation of proposed mitigation measures would reduce noise levels so they comply with all relevant noise regulations (see Final EIR, section 2.4.5). The project will comply with the County Light Pollution Code (County Code 51.201 et seq), and Section 6322 of the County Zoning Ordinance (see Final EIR, page 2.5-11 and 2.5-12). All outdoor lighting will be approved types and will be adjusted to reflect light downward and away from roads, driveways, and adjoining property. The proposed project is consistent with the Ramona Community Plan guideline directing that lighting be used efficiently to aid safety, security and to compliment architectural character without intrusion into adjacent properties, roadways and the night sky.

activities proposed would be an expansion of existing uses, which include hiking, nature walks, arts and crafts, recreation, retreats, and special events. The hours of operation for the expanded facility would be similar to the existing facility.

JCC2 (cont'd)

"The project proposes to expand the existing Salvation Army Divisional Camp and Retreat in a logical and coordinated fashion that is sensitive to the existing environment, provides for habitat protection, is aesthetically pleasing, reinforces community identity, and promotes public health, safety and welfare.

"The Salvation Army Divisional Camp is envisioned as a low density, planned camping facility. Table 2.7-1 illustrates the difference between the existing and proposed development acreages. The proposed project will reinforce the community identity of Ramona through implementation for design elements consistent with the rural character of the surrounding community. Specific project design elements include low-scale, one- and two-story structures that would be clustered in five general areas to minimize building assign, landform alteration and vegetation removal. Substantial open space has also been worked into the site plant to minimize disruption to the natural form of the terrain, and to minimize building massing. The design treatment of the proposed buildings would be rustic in character, built with wood, brick or masonry, and finished with exterior earth-tone colors.

"The total proposed building and lot coverage is estimated at only two percent. Most buildings are relatively small in scale (1-2 stories). Larger buildings proposed are of a similar scale to barns, stables or storage structures for agricultural equipment – all of which exist in areas immediately surround the damp. In addition, the project includes a Landscape Concept Plan that includes substantial landscaping to soften and screen proposed buildings with native drought-tolerant species that are consistent with existing on-site vegetation." (pp. 2.7-2 – 2.7-3)

On its face, that analysis presupposes that the issue of community character is a rather narrow one that can be incorporated into this project by simply making cosmetic adjustments architecturally and otherwise to fit the project into its immediate surroundings. This narrow reading of the law and its intent, if accepted by the County of San Diego Planning Commission and/or the Board of Supervisors and applied to this project, would ultimately ignore the serious and unmitigated general impacts to the community character of the area that would be caused by this project.

First of all, the Mussey Grade corridor, consisting chiefly of a five mile historic road, and recognized as such by the California State Historical Resources Commission,[1] is unique in the entire county. It boasts, among other characteristics, an ancient oak canopy lining the narrow 2-lane road, which curves and meanders from State Route 67 to the road's end into the San Vicente Reservoir. The paved road literally follows the

JCC2 [1] See letter dated March 30, 2004 from Dr. Knox Mellon, State Historic Preservation Officer, Office of Historic Preservation, State of California Department of Parks and Recreation, transmitting the designation of the Mussey Grade Road Site as a California Point of Historical Interest by the State Historical Resources Commission voting unanimously to approve the designation on November 7, 2003, attached.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC2: (cont'd.)

The project would not cause any significant adverse aesthetic impact. The project will not be readily visible from surrounding areas, and where visible, will be at such a distance that it would not create a significant impact (see Final EIR, section 2.5.3). Please see DEIR responses to comments JA1 through JA25. As described in the EIR, the expanded development has been clustered within the already developed portions of the site and has been sensitively designed to compliment the natural beauty of the project area (see Final EIR, section 2.5.3). The project would not be a commercial venture as explained in DEIR response to comment I6

The comment does not explain why the project is not consistent with the "applicable land use plans and policies referred to in section 2.7.3.2 of the Final EIR. However, the County agrees that the EIR analysis identified significant and unmitigated impacts associated with the Applicant's Preferred Project related to conflicts with the MSCP (Biological Resources) and the General Plan Conservation Element (Land Use). Because there are alternatives to the Applicant's Preferred Project that can avoid these unmitigated impacts, one of these alternatives, Reduced Project Alternative I, will be presented to the decision makers for consideration (Final EIR pages 5-3, 4-5, 4-6, 4-7).

JCC Footnotes:

1 through 6. Footnotes 1 through 6 indicate the source of information as provided in this comment. The County has considered this information in responding to comment JCC2.

7. The density requirements contained in the "zone box" are not applicable to the proposed project because these requirements pertain to residential densities. The analysis provided in the EIR supports the conclusion that the proposed project would retain the community character of the Mussey Grade Road area. The project site is relatively isolated and is not visible from Mussey Grade Road and will not result in impacts related to land use, traffic, noise, or aesthetics. While the number of camp users will increase from the camp's current maximum overnight population of 200, to 615 (under Reduced Project Alternative I), the increase in capacity of 419 overnight campers would not result in significant impacts to environmental factors related to community character, such as traffic, noise and aesthetics. Therefore, the increase in capacity would not affect community character. Please see DEIR response to comment JCC2.

original stagecoach route created in the late 19th century and which served as the main trunk line from San Diego to Julian, serving the Julian gold mining community.[2]

In 1943 the San Vicente Reservoir, owned and operated by the City of San Diego, was created. This reservoir bisected the remaining original portion of Mussey Grade Road and covered the town of Foster, located between Fernbrook and Lakeside. Today, Mussey Grade Road literally dead ends into the lake. This fact is important to an informed understanding of the community that grew up alongside the road, a community that has been for many years forgotten and ignored by the development engulfing San Diego County. **JCC2 (cont'd)**

For example, the village of Fernbrook, located approximately one mile north of the lake and situated in the southernmost section of the extant road, is itself an Unincorporated Area of the County of San Diego. In the past, Fernbrook, and particularly the Atkinson Brothers Toll House off of Mussey Grade Road and within Fernbrook, served as a way station for coaches and wagons traveling to Julian.[3] Although Fernbrook was included in the Ramona Community Planning Group Area, it is its own county designated entity as it preceded much of the development of Ramona, lying as it did along the original and documented stagecoach route[4].

Today, the balance of the area surrounding Mussey Grade Road has remained uninhabited, environmentally pristine and intact. Compared with development in other areas where roads connect to other roads and exponentially increase growth, Mussey Grade is a throwback to another time, another era and has been recognized as such by writers and reporters[5] who have lauded its beauty, stillness, peacefulness, abundance of wildlife, rushing seasonal streams and magnificent oaks - all traits which have been preserved by its unique geography and particular history.

Polls have shown that in restless Southern California people are expected to stay in their homes no more than three years, but the community of Mussey Grade Road bucks this trend. There are families on the road and its country lane offshoots who trace their

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[2] See "Ramona Roundabout, A history of San Diego County's little known backcountry," by Charles R. LeMenager, Eagle Peak Publishing Co., 1983, p. 105 – 107.

[3] See Atkinson Brothers Toll House, picture and text, at www.MusseyGradeRoad.org

JCC2 [4] See State of California Form DPR 523 and Letter of Support from the San Diego County Board of Supervisors, Listing of Mussey Grade Road on the California Register of Historical Resources, Prepared by Dianne Jacob, San Diego County Board of Supervisors, Appendix F, Technical Appendixes – Volume II, Draft Environmental Impact Report for the Proposed Salvation Army divisional Camp and Retreat, February 2005; also see, Board of Supervisors Chairman Bill Horn March 12, 2001 Letter to Knox Mellon, State Historic Preservation Officer, Office of Historic Preservation, State of California Department of Parks and Recreation, supporting the nomination of Mussey Grade Road to the California Register of Historical Resources, attached.

[5] Mussey Grade Road is a constant source of amazement to those in the press who travel here. For example, see "Grade reveals shaded dells, peace and quiet", by Bob Rodriguez, Times-Advocate, October 30, 1977, attached. For a more recent paean to the road and its environs, see online "No Stress Byway", by Jack Brandais, San Diego Union-Tribune, August 28, 2004, Saturday Weekend Edition. This article compliments the beauty of the road even after the immense destruction suffered during the catastrophic Cedar Fire or 2003. The oak grove along the road is slowly recovering at this time.

lineage back to great-grandmothers and great-grandfathers. Residents on the larger tracts of land have been living here for 25, 30 and 40 and more years. In fact, a number of large ranches still remain within the Mussey Grade Valley. These ranches range from 160 acres to over 500 acres and are normally used for domestic animal husbandry and enjoyment of a rural lifestyle. JCC2 (cont'd)

The County Board of Supervisors recognized the uniqueness of the community of Mussey Grade Road by purchasing over the last five years some 2,200 acres of land to preserve within the MSCP plan. This acreage itself is similar to other land in the valley consisting of steep mountainous areas and chaparral covered hillsides. The acquisition of this land for limited use and preservation is an acknowledgement of the rare rural qualities that the Mussey Grade valley is known for and for the county's wisdom in wishing to share this precious resource in a preserved and managed manner.[6]

On the other hand, the Salvation Army contemplates some tens of thousands of square feet of building space to accommodate a buildout of 748 fulltime occupancy.[7] To illustrate what this means, take a pin and a piece of string and place it on the map in Ramona. Then move the string in a circle representing 30 miles. If one does this simple exercise, one realizes that there is no other facility that would accommodate this incredibly dense number of people with one exception – Barona Casino, built on federal Indian land and exempt from county environmental oversight.

The scope of the Salvation Army Divisional Camp project is, on its face, completely incompatible with the existing land uses not only in the Mussey Grade Road valley but in the entire area encompassing Poway, Ramona and Lakeside, the closest towns to the project. The project is incompatible not only due to the large number of square feet of building space and the unaccustomed density that the project will bring to the road, the neighborhood and the larger Mussey Grade neighborhood; it is also incompatible with the surrounding neighborhood in its very *nature,* that is, introducing a commercial venture into a non-commercial, agricultural, and rural community. This introduction of use is not consistent with the applicable land use plans and policies referred to in 2.7.3.2 (p.2.7-3).

JCC2 [6] Supervisor Dianne Jacob should be commended for taking the lead in working to preserve both a 1,150-acre parcel formerly owned by the San Diego Boys and Girls Club, along with the 1,250-acre historic Boulder Oaks Ranch, owned at one time by the Forward family of San Diego. (Acreages are estimated.) These two parcels are part of an overall plan to preserve some 14,000 area acres in the Iron Mountain Preservation Area which includes land falling into both the City of Poway and unincorporated areas of San Diego County.

[7] The scale of use of the land is extraordinary. For example, assuming for the sake of argument that a generous 400 acres out of the 578 owned by the Army are able to be converted into buildable lots, and understanding that the majority of the Army's land is in the mountainous region of the property, not along Mussey Grade Road, causing the lots sizes under the 2020 General Plan Update to be a minimum of 40 acres, and assigning a value of even 6 persons to each housing unit, there would be a total allowable number of 10 homes housing a total allowable number of 60 persons. This means that the Army's plan results in a density more than a factor of 10 at 748-person and somewhat less than a factor of 10 at 513-person suggested density usage in Alternative III, the smallest number suggested in the Army's plan.

Moreover, this use will indeed divide an established community through changing the nature of use along historic Mussey Grade Road. Despite the argument put forward at 2.7.3.3 asserting that because the project "involves expansion of an existing use within a rural area" and the statement that "the project would not isolate surrounding uses or divide an established community" (p. 2.7-3), in fact the project would bring about this very result because in scope and in scale it is not a rural project. JCC3

Today, there is no before and after along the continuous rural setting of Mussey Grade Road. The road consists of a whole cloth with no division between its parts. However, the addition of a massive commercial project into the environs of Mussey Grade will mean incongruous traffic, noise, and overall usage dividing the road usage between State Route 67 and the Salvation Army entrance from the usage between the facility's entrance and the southernmost point of the road's dead end.

There will be, if the argument concerning community character in this EIR goes unchallenged and unchanged by decisionmakers, a complete division and difference between those areas affected by the traffic to the camp produced both by renters and companies provisioning supplies and other related business traffic and the quiet nature of the road south of the facility.

One community will be urbanized with the busy, boisterous and overwhelming presence of hundreds of persons who do not live in the area - visitors who will pay the Army to use the facility. The other community below the facility will occupy an unwanted "splendid isolation," peaceful but continually threatened by the nature of a destination resort north along the road and its negative effects on the former quiet nature of the entire community the Mussey Grade Road serves. This destination resort facility will be widely advertised and represents a commercially viable investment the Army has chosen to develop in this undeveloped area.[8]

Despite the Army's characterization at 2.7.3.3 and in other portions of the DEIR of the Golden Eagle West Ranch as a "commercial/retail horse breeding ranch " in a unseemly effort to link the commercialization asserted for this ranch with the commercialization the Army intends to add to Mussey Grade Road, it is a fact that the majority of traffic and disturbance along the road are not the cause of this quiet ranch operation but the result of traffic generated by unpermitted residences at Mussey Grade Village, a grandfathered in mobile home and recreational vehicle park.[9] Additionally, the majority of residents along Dos Picos Park Road were pleased to welcome and support the existing horse operations due to the rural nature of the horse breeding farm and the

[8] It is no secret that the Army plans to advertise and rent this facility to whomever it chooses as the Army has admitted that it will do so in community planning group meetings and other settings with Mussey Grade Road Alliance members. JCC3

[9] For a thorough discussion of this problem, see Addendum to Transportation/Traffic Analysis, Traffic Chapter, in this Comment Report. Traffic along Mussey Grade Road has noticeably increased – perhaps doubling – and become more treacherous since the current owner purchased the camp and began the purportedly illegal installation of units.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005

Response to Comment JCC3:
The County does not concur with this comment. The proposed project would not isolate surrounding uses or divide an established community. The proposed project would not physically separate existing land uses from one another. The project maintains the rural character of the area, as discussed in ensuing responses. The comment incorrectly characterizes the proposed camp as a commercial project. See DEIR response to comment I6. The project site is not zoned for commercial use, and the project would expand the existing camp/retreat at the site. No additional tax revenues would be provided to the County. See comment J13. Additionally, the comment states that the project will affect community character by creating incongruous traffic and noise; however, no significant impact to these issues have been identified (see EIR Sections 3.1.4 and 3.1.10). Please also see DEIR responses to comments JCC2 and JI1A.

As stated in the EIR, the project site is large and relatively isolated and is not visible from Mussey Grade Road. Proposed development on the site is clustered, allowing 68 percent of the project site to remain in open space.

Further, the County does not concur that the EIR characterizes the Golden Eagle West Ranch as a "commercial/retail horse breeding ranch" in an effort to link the purported commercialization of this project with adjacent development. The EIR properly characterizes the land uses surrounding the project site, which includes the Golden Eagle West Ranch, a commercial/retail use.

JCC3 Footnotes:

8. The intended uses of the proposed facility are identified in Chapter 1.0 of the Final EIR, which includes rental of the facility to other organizations. The Salvation Army rents the existing camp/retreat to other organizations listed in Final EIR section 1.4.2.
9. See DEIR responses to comments JT1 through JT27 regarding the traffic analysis.

Response to Comment JCC4:
The County does not concur that the EIR concludes that the "project essentially protects the environment." This comment erroneously compares the allowable General Plan residential dwelling unit density of surrounding areas with the maximum capacity of the Salvation Army Divisional Camp and Retreat, a non-residential use. Such a comparison is not valid as the project is not a residential use, and is allowed by Major Use Permit. While the capacity of the camp will be expanded, the rural character will be retained, including retention of 68 percent of the project site in open space (Final

fitting addition of this use to the area.[10] In contrast, members of the Mussey Grade Road Alliance, both living along Mussey Grade and Dos Picos Park Road, have consistently opposed the Army's proposed project due to the massive commercial impacts it will import into the area. JCC3 (cont'd)

All of these impacts, which if individually discussed may seem reasonable, become undeniably unreasonable when the full and total effect of the project is even cursorily compared to the existing uses and community character. There is no denying that the project would deeply impact the nature of the road, the quietude of its surroundings and the entire character of the Mussey Grade Valley community that it serves when one takes into account cumulatively each of the impacts the project would bring to Mussey Grade that presently do not exist.

This analysis will guide the reader through the community as it exists now and the community that will result should this project be approved in the main or any one of the alternatives approved in lieu of the project. It will be clear to the reader by the end of this analysis that this project cannot and will not ever be compatible with existing uses or character and is, in fact, incompatible with our community.

THE ANALYSIS

The Army compares its proposed project to the San Diego County General Plan, including the Ramona Community Plan and Ramona Design Guidelines, citing "each goal and policy applicable to the project, an analysis of project consistency or conformance, or rationale for why a specific goal is not applicable to the project." 2.7.3.2 (p. 2.7-3). The following analysis points out the erroneous interpretation of these plans by the Army in specific areas:

General Plan (pp. 2.7-4 – 2.7-13)

1. Under the General Open Space Element Goals, erroneously interprets the project as "an open space barrier between developed areas and more open, undeveloped spaces" based on the premise of more development for housing or other uses. This reasoning seems to anticipate the "probable future projects" term used in California Environmental Quality Act [11](CEQA).[12] Here, instead of anticipating the huge and incongruous effects JCC4

JCC3 [10] As per notes re telecon with Golden Eagle West owner Betty L. Mabee, in 2001 concerning farm operations and comments she received from Dos Picos Park Road residents overlooking the horse farm operations from their homes.

JCC4 [11] (Pub. Resources Code, Section 21000 et. seq.) ("CEQA"), enacted in 1970, one year after Congress enacted its predecessor statute, the National Environmental Policy Act. Like the federal act, CEQA was conceived primarily as a means to require public agency decisionmakers to document and consider the environmental implications of their actions.

[12] Section 21083. Under CEQA section 21083, an individual project's incremental effect must be viewed in combination with the effects of relevant past, present and probable future projects to determine whether the individual effect is cumulatively considerable, *Communities for a Better Environment et al v. California Resources* Agency, 126 Cal.Rptr. 2d. 441, Cal.App.3 Dist., 2002

of the project at the outset of this analysis under the General Plan, the Army is stating that the project essentially **protects the environment.** The error the Army makes is the assumption that housing density similar to the density of 748 continuous users of the facility would be feasible and allowable either on the Army's own land or on adjacent land. In fact, as stated earlier at footnote 7, the opposite is true: **JCC4 (cont'd)**

The scale of use of the land is extraordinary. For example, assuming for the sake of argument that a generous 400 acres out of the 578 are able to be converted into buildable lots, and understanding that the majority of the Army's land is in the mountainous region of the property, not along Mussey Grade Road, causing the lots sizes under the 2020 General Plan Update to be a minimum of 40 acres, and assigning a value of even 6 persons to each housing unit, there would be a total allowable number of 10 homes housing a total number of 60 persons. This means that the Army's plan results in a density more than a factor of 10 at 748-person and somewhat less than a factor of 10 at 513-person suggested density usage in Alternative III, the smallest number the Army suggests in its plan.

2. Under Countywide Recreation Area Goal, erroneously characterizes the proposed project as contributing to the preservation of plant and animal habitats, while in fact the Army proposes to build up to 24 aces of leach fields, an unheard of feat, and displacing natural vegetation. This massive leach field system is being built in anticipation of dense, commercial usage economically enriching the Army. **JCC5**
3. Under Preservation of Resources and Natural Processes Goals, refer to Comment 1. **JCC6**
4. Under Agricultural Preserves and Open Space Easements and Open Space and Design of Private Lands, Goal 1, Health and Safety ("Protect life and property by regulating use of areas subject to flooding, landslides, **high fire hazards** and high earthquake potential."), the Army ignores the lessons of the October 2003 Cedar Fire, where the Army evacuated 100 persons, according to their own statements, and lost a large number of on-site structures.[13] It is clear from the Cedar Fire that setbacks, interior sprinkler systems and water flow are not sufficient fire protection in this rugged land area, which is, due to its natural vegetation and topography, especially prone to regular fire incidents. **JCC7**
5. Under Regional Land Use Element, Goal 1.1: ("Urban growth be directed to areas within or adjacent to existing urban areas, and that the rural setting and lifestyle of the remaining areas of the County be retained."), **the Army postulates that the anticipated expansion does not require "the expansion of public facilities or utilities and therefore does not contribute to urban growth or other growth inducing impacts in the area." However, the Army plans to widen State Route 67 and the intersection of Mussey Grade Road, as well as the intersection of 67 with Highland Valley/Dye Road, as mitigation regarding the anticipated transportation and traffic impacts generated by** **JCC8**

JCC7 [13] The Army lists these as including "three staff residences, one activity building, two camp cabins, one infirmary, one maintenance shed along with vehicles and equipment, and one tent/platform" at p. 2.7.-9 in this section of the DEIR. Essentially this comprised most of the buildings on site at the time.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC4: (cont'd.)
EIR Table 2.7-1 Land Use Summary). By providing 395 acres of open space, the project would provide "an open space barrier between developed areas and more open, undeveloped spaces." Additionally, with the implementation of mitigation measures identified in the EIR, the project will not result in impacts related to aesthetics, noise, or lighting.

JCC4 Footnotes:
Comment noted.

Response to Comment JCC5:
While the capacity of the camp will be expanded, the rural character will be retained, including retention of approximately 395 acres in open space under Reduced Project Alternative I (EIR Table 2.7-1 Land Use Summary). The biological areas in which proposed leach fields would be expanded comprise approximately 12 acres, and the biological impacts to these areas will be temporary (see Final EIR, section 2.2.3).

Response to Comment JCC6:
Please see DEIR response to comment JCC4.

Response to Comment JCC7:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials.

JCC 7 Footnote:
13. Comment noted.

Response to Comment JCC8:
The noted transportation mitigation is required to mitigate the cumulative traffic impacts in this area and not to mitigate any project-level impacts. Traffic congestion in this area is an existing problem, and the purpose of the cumulative impact mitigation is to mitigate this project's incremental addition to the cumulative traffic condition. The required road improvements would not create any "excess capacity" that would induce additional growth.

the Army's proposed project. These are public facilities and constitute growth inducement by the very nature of creating larger roads for larger numbers of cars.

6. Under Goal 1.2: ("Growth be phased with facilities."), the Army states that the project "would not require any external facility upgrades or new facilities" yet the Army plans to enlarge the existing water pipe providing water supplies from the Ramona Municipal Water District (RMWD) from six to ten inches and to include a 260,000 gallon water tank, which, it is stated in this DEIR, is the property of the RMWD. **JCC9**
7. Under Goal 2.1 ("Promote wise uses of the County's land resources, preserving options for future use."), the Army states that it is "creating a vast open space easement", however there is no guarantee that this easement will prevent development in the future by either the Army or other owners to whom the Army may sell the facility. Unless the land is conveyed with title to the County of San Diego for the express purpose of preservation and is added to the Iron Mountain Conservation Area, there is no guarantee that the land will indeed be preserved. In fact, open space easements are viewed by some as a form of "land banking" that purports to be for preservation but whose goal is the opposite. **JCC10**
8. Under Goal 2.3 ("Retain the rural character of non-urban lands."), the Army suggests that rural character is attained through building design rather than through the obvious criteria of actual use. This tact is taken repeatedly throughout the DEIR; that is the Army continually confuses rural character with architecture rather than with the essence of rural character: low density usage. **JCC11**
9. Under Goal 2.6 ("Ensure preservation of contiguous, regionally significant open space corridors."), the Army states that the local wildlife corridor (leading in its naturally furthest reaches to Iron Mountain in the west, the essentially undeveloped Monte Vista Ranch consisting of over 4,000 acres to the east, and to the San Vicente Lake region in the south, a huge interconnected watershed that remains to this day essentially unspoiled and regularly used by all types of wildlife, is "not considered a regional corridor due to its limited width, existing constraints (Mussey Grade Road and adjacent development), and a lack of connectivity to regionally significant open space east of the site. Therefore, this goal does not apply to the project." The contradiction is evident to the close reader and the Army relies on no authority other than their own paid biologist consultant to deem the corridor not regionally significant. See also the Biology Chapter in this Comment Report. This factual error regarding wildlife corridors is indicative of the Army's purposeful ignoring of the present reality of the place in which it wants to expand. **JCC12**
10. Under Goal 3.1: ("Protect lands needed for preservation of natural and cultural resources; managed production of resources; and recreation, education, and scientific activities."), the Army states that by "avoiding sensitive habitats to the maximum extent practicable" among other measures it will take, that the "proposed project is consistent" with the Regional Land Use Element goal. Just saying it is so does not make it so. In fact, the Army's proposed inconsistent density changes the natural relationship of the land it owns to the contiguous, pre-approved mitigation land under the MSCP already purchased by the County. If, **JCC13**

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC9:
The County does not concur with this comment. The proposed utility improvements are limited to improvements on the project site. No "external" (off-site) improvements would be required for the project. The water line and the water tank referenced in the comment would be located on-site; therefore, the project would not expand the capacity of infrastructure off-site.

Response to Comment JCC10:
The project's proposed open space easement has been revised to increase the amount of preserved area and decrease the amount of edge, and/or provide greater connectivity through the project site and with off-site preserve lands (thereby reducing non-preserve edge). The revised open space configuration creates more significant blocks of preserved habitat to reduce edge effects and to maximize the ratio of area to the perimeter of conserved habitats, while providing connectivity with off-site preserve lands, ensuring compliance with the MSCP Preserve Design Criteria. The revised open space configurations maximize the habitat structural diversity of conserved habitat areas. The revised easement configuration also conserves more habitat than is required for habitat-based mitigation, resulting in a net gain of preservation over development (see Final EIR page I-5). The revised open space easement will cover 395 acres. The open space easement will be dedicated to the County of San Diego with the California Department of Fish and Game as a third party beneficiary (see Final EIR, page 1-5). The open space easement will protect this area from future development.

Response to Comment JCC11:
The County does not concur with this comment. There are several aspects of the proposed project that contribute to maintaining rural character. These include project design, architecture, preservation of open space, and proposed use. The County does not concur that the project is inconsistent with the community character of the area. Please see DEIR responses to comments JCC1 through JCC10, and JA1 through JA25.

Response to Comment JCC12:
The County does not concur with this comment. As explained in the EIR (see EIR page 2.2-12) the project site is not located within a regional wildlife corridor; however, a local wildlife corridor traverses a portion of the site. Please see RDEIR responses to comments IB4.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC13:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources.

on the other hand, the Army retained the truly rural nature of its present facility through adoption of the No Project Alternative, this land use element would be honestly satisfied. JCC13 (cont'd)

11. Under Goal 3.2: ("Promote the conservation of water and energy sources."), the Army proposes that the use of energy and water conservation techniques, as well as the use of low-flow water fixtures, satisfies this element. However, at one time the Army suggested using 250,000 gallons of water per day from existing and new wells. The well usage the Army anticipates should be clearly stated in the DEIR itself and not hidden in the Technical Appendices. JCC14
12. Under Public Safety Element, Goal: ("Minimize injury, loss of life and damage to property resulting from fire, geologic or crime occurrence."), the Army would need to revise its proposed project plan to be consistent with the comments of the Ramona Municipal Water District (RMWD) letter of March 23, 2005, requiring as a condition of the facility's expansion, a secondary access road either to Dos Picos Park Road or State Route 67, and not on Mussey Grade Road south of Dos Picos Park Road.[14] In this regard, the Army should also review the letter from Ramona Community Planning Group Secretary Kristi Mansolf, dated March 21, 2005, to the RMWD, and stating that "Shelter in place has been removed from the Salvation Army project Draft Environmental Impact Report (DEIR). Evacuation remains the only option."[15] JCC15
13. Under Public Facilities Element, Section 2 – Coordination Policies: ("Assure that growth is limited to areas where adequate public facilities exist or can be effectively provided."), the Army again states that "No new public facilities would be required for the project", despite its own suggestion to mitigate traffic effects by widening State Route 67. Under the next portion of Section 2, "Development projects will be required to provide or fund their fair share of all public facilities as needed by the development."), the Army states, "Although no new public facilities for facility upgrades are required for the projects or its associated impacts, the Salvation Army has volunteered a public benefit contribution of $5,000 toward County-planned improvements to a local intersection [EIR Section 1.1.1.2]."). However, under 12.0 Significance of Impacts/Mitigation Measures, Cumulative Impacts, Appendix E Traffic Impact Analysis, at p. 29, where the admission occurs that the project is "calculated to contribute significant cumulative impacts" in Ramona, the Army states: "The following measure would reduce the project's contribution to the cumulative impacts to intersections and roadway segments to a level that is not cumulatively considerable. Construct the following improvements to the SR 67/Dye Road/Highland Valley Road intersection: i. provide a second westbound to southbound left-turn lane from Dye Road to SR-67, and; ii. Lengthen the existing northbound to eastbound right-turn pocket from SR-67 to Dye Road to provide a 500-foot long pocket." These mitigation measures proposed by the Army are a direct result of the cumulative impacts of its proposed project on public roadways/facilities and these measures to mitigate those impacts are not volunteer. The Army also proposes to widen the Mussey Grade Road intersection JCC16

[14] Letter attached
[15] Letter attached

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC14:
The County does not concur with this comment. The projected water demand is provided in the Final EIR, page 6-2. Based on the updated Water System Evaluation (RMWD, 2009) (see Final EIR Appendix J), the projected water demand of the proposed project is approximately 56,901 gallons per day (GPD) (not 250,000 gallons per day as stated by the comment), which includes approximately 13,101 GPD for irrigation water and 43,800 GPD for potable water use. Although not proposed under the project, groundwater at the site can be used for irrigation purposes only.

Response to Comment JCC15:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.7 Land Use/Planning.

Response to Comment JCC16:
The project would not cause any direct traffic impacts and therefore would not require the construction of any new public roads or other public transportation facilities. The project would contribute to cumulative traffic impacts. After the DEIR was circulated for public review, the County adopted the Traffic Impact Fee (TIF) program to defray the cost to construct planned transportation facilities necessary to accommodate increased traffic generated by future development (County Code section 77.202). If the project is approved, it will pay the required TIF to mitigate the project's cumulative traffic impacts.

Please see DEIR responses to comments JCC8 and JCC9 and the Final EIR, page 2.7-11.

at SR-67. Perhaps this is the volunteer effort the Army is referring to in this section.

14. Under Section 4.2 ("....New development shall provide off-site improvements designed to contribute to the overall achievement of a Level of Service 'D' on Circulation Element Roads,"), the Army states "The mitigation proposed in EIR Section 3.1.10 would contribute to the overall achievement of LOS D or better for off-site Circulation element roads." EIR Section 3.1.10 concerns Transportation/Traffic under the 3.0 Cumulative Impacts Analysis. The Army does not state in this section that it will attain an LOS D in the Highland Valley/Dye Road/SR-67 intersection, although it does assert that "The reduction in delays due to the mitigation measures would greatly exceed the project's contribution to the significant cumulative impacts 91.2 seconds in the AM and 0.0. seconds in the PM." (p. 3-9, under MM, 3.1.0, a & b). Equally troubling, the Army does not explain how the "refuge lane" lengthening on SR-67 for left turns from Mussey Grade onto SR-67 will improve the LOS above the level of F during especially evening rush hour. Furthermore, the Army adds to the dangerous feat of turning left onto SR-67 from Mussey Grade in evening rush hours (known to begin by those who live in Ramona at approximately 3:30 and ending at approximately 7:00 p.m.) when traffic is regularly stacked up on SR-67 and only through the charity of drivers are Mussey Grade Road cars "allowed", if you will, to turn left. Once the widening of the intersection approach of Mussey Grade Road intersection to match the planned extension of the northbound to eastbound right-turn pocket at Dye Road, and suggested by the Army at MM 3.1.10, a & b, iii on page 3-9, is completed, the temptation for northbound drivers to speed up through the widened intersection will add to the difficulties of turning left from Mussey Grade Road onto SR-67. These facts are even more problematic if one adds the anticipated Average Daily Trips onto Mussey Grade, estimated at a low-ball 212 per day, adding more complication and difficulty at the intersection. The Army states nowhere in the DEIR that the intersection would achieve an LOS of D for that particular problem. **JCC17**

15. Under 2.1 of Section 4.2 ("No development shall be required to contribute its fair share toward financing transportation facilities."), the Army states that its "public benefit contribution for $5,000 toward County-planned improvements to the SR-67/Dye Road/Highland Valley Road intersection" is consistent with this policy. Since the Army implies that the County already planned to widen this intersection presumably before this project is approved and hardly able to calculate into the pre-planned improvements the full impacts of this project before the project is itself actually approved, if it is indeed approved, this contribution seems facially inadequate at best and grossly inadequate at worst. **JCC18**

16. Under Conservation Element, a. Water Policies, Policy 8: ("Wastewater discharges shall not adversely affect the beneficial uses of receiving water."), the Army states that it will conform with all water quality regulations so that wastewater discharges do not adversely affect receiving waters, however the details of its own system are not included in the DEIR. Therefore the efficiency and efficacy of its septic system, the largest ever proposed in the entire County of San Diego with tens of thousands of feet of leach lines, is essentially unknown. It **JCC19**

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC17:
The County does not concur with this comment. The improvements identified in the comment, were intended to address the project's contribution to the cumulative traffic impacts. After the DEIR was circulated for public review, the County adopted the Traffic Impact Fee (TIF) program to address cumulative traffic impacts throughout the County. If the project is approved, it will pay the required TIF to mitigate the project's cumulative traffic impacts. If approved, the project would not construct the road improvements described in the comment, but, instead, would pay the required TIF.

Response to Comment JCC18:
The County does not concur with this comment. The comment incorrectly quotes the EIR text under Section 2.1. The text actually states, "New development shall be required to contribute its fair share toward financing transportation facilities." (Emphasis added). The project will pay the required TIF fee for cumulative impacts to regional roads. The TIF fee will mitigate the project's contribution to the cumulative impact at the SR-67/Dye Road/Highland Valley Road and SR-67/Mussey Grade Road intersections. Please see DEIR response to comment JCC16.

Response to Comment JCC19:
The project proposes a septic system that must be reviewed and approved by the County Department of Environmental Health (DEH). The septic system will conform to Department of Environmental Health standards to ensure that septic system use would have no adverse impact to downstream waters. Please see DEIR responses to comments I12, I19 and J15.

is also important to note that the Army's site sits directly above the San Vicente Reservoir in a watershed known for extensive runoff and violent flooding. In this banner year of more than 26 inches of rain received during the winter season from October 2004 to the present time, flooding has regularly occurred in the adjacent streambed, overflowing onto Mussey Grade Road and silting up the course of the blue-line stream running along the road and under culverts. In one case, at the intersection of Mussey Grade Road and Mahogany Ranch Road, the culvert completely failed and the stream tore through new beds in the downstream properties. It can be anticipated that the County of San Diego as well as the Mussey Grade Road area will experience future unusual storm effects, as is the case worldwide under the influence of global warming. It is unclear how the acres and acres of septic lines dug into a mountain in a major watershed area directly below Iron Mountain, Dos Picos, and Mt. Woodson will function effectively under unusual but foreseeable weather conditions. The County should be particularly concerned with this issue as the County has been designated as the enforcement agency for Stormwater permits by the state Water Quality Control Board. Thus, the County is the prime agency responsible for the proper functioning of this system, particularly as it applies to the presumed foreseeable negative effects the septic system runoff may contribute to the immediate area and the City of San Diego San Vicente drinking water reservoir.

JCC19 (cont'd)

17. Under Vegetation and Wildlife Policies, refer to the Biology Chapter in this Comment Report.

Ramona Community Plan (pp. 2.7-13 – 2.7-16)

JCC20

Under Community Character, Goal: ("Preserve and enhance the existing rural atmosphere of the Ramona Community and encourage land uses, structural designs, and landscaping which are compatible with a country lifestyle."), the Army states: "By designing the project with low-scale, one-and-two story structures that would be clustered in five general areas to minimize building massing, landform alteration and vegetation removal, the proposed project is consistent with the local community character" (p. 2.7-13). The Army neglects to state that, at present, there are no two-story structures of the type the Army contemplates building in the area of Mussey Grade Road. While the Army emphasizes that landscape will "soften and screen proposed buildings", there would be obviously no need for such non-indigenous landscaping if the buildings were appropriate to the area. However, the most important element of this goal, compatibility with "a country lifestyle", is not met with the Army's plan simply because of the massive number of square feet of building space the Army anticipates is necessary for its functioning of this commercial facility. There is nothing for the facility, otherwise known as a conference center in the Army's own sign on Mussey Grade Road, to be locally compatible with. There is no use like this on the road nor has there ever been a use similar to the full buildout dimensions of this plan ever in the more than 100-year history of Mussey Grade Road.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC20:

The County does not concur with this comment. The analysis provided in the EIR supports the conclusion that the proposed project would retain the community character of the Mussey Grade Road area. The project site is large, relatively isolated, and not visible from Mussey Grade Road. The development of the project would not result in impacts related to land use, traffic, noise, or aesthetics. The rationale for the conclusion that the project will not impact community character is discussed in detail in DEIR responses to comments JA5, JCC2, and JCC11.

The size of the main existing camp structures (the Ranch House dining facility, five masonry cabins, the lodge and five cabins, and the five Yurts) is approximately 32,500 square feet.

In all, the existing site is covered by approximately 33,570 square feet of structures (all one-story), which equals 0.13% lot coverage. This modification will increase the number of structures to 54 including more camp cabins, a nature/educational camp, more staff housing, larger maintenance facilities, new administrative support facilities and an expanded retreat center. The buildings will include 207,620 square feet. However, four staff housing buildings and the four retreat guest housing units are two stories high. Consequently, 29,600 square feet of the second story area must be subtracted from the total square footage. With this calculation, the proposed increase in building footprint would be 144,450 square feet. After combining this coverage with the existing coverage of the buildings that are planned to remain, the total lot coverage equals 0.57% of the property. Given that the surrounding land uses are open space, low-density rural single-family housing and a commercial horse breeding ranch, the project's low lot coverage (less than one percent of the site) will be consistent with the surrounding uses.

The proposed project is the expansion of an existing camp and retreat center that has been in operation for several decades under the original County Major Use Permit (MUP) P70-379 and modification P70-379W. The project proposes to continue the existing uses of the site, which is a camp and retreat facility. While the number of camp users will increase from 200, the camp's current maximum overnight population, to 615 (under Reduced Project Alternative I), the net increase of capacity of 419 overnight campers would not result in significant impacts to environmental factors related to community character, such as traffic, noise and aesthetics. Therefore, the increase in capacity would not affect community character. Please see DEIR response to comment JCC2.

While the DEIR does not give a simple overview of the total number of square footage the Army plans to build, it is clear even from the description in the Project Synopsis at S.1 that something very different and very incompatible with the community character of Mussey Grade Road is afoot. There the Army states the proposed project will include the following major components:

JCC20 (cont'd)

- Expanded Cabin Camping Component
- Expanded and Relocated Tent Camping Component
- Nature Study/Educational Camp Component
- Expanded and Relocated Conference (sic) and Retreat Center (Retreat)
- Additional Staff Housing
- Expanded Support Facilities. The proposed project would include the following expanded support facilities:

- An approximately 21,000 square-foot central dining facility with a capacity of approximately 600 users.
- An approximately 19,500 square-foot multi-purpose building with a capacity of approximately 600 users.
- An approximately 2,500 square –foot indoor mini-theater building with a capacity of approximately 125 users.
- A central administrative cluster of buildings with a combined maximum square footage of approximately 6,000 square feet to serve the entire camp. The administrative offices, a small infirmary, and a small convenience store "canteen" for employees and users of the camp.
- The existing maintenance facilities would be demolished and relocated to central part of the property along the eastern boundary.
- New sports and play areas including tennis courts, basketball courts, a large swimming poll and an approximately 2,500-square-foot restroom and shower facility.
- A standard (sic) septic system and leach fields through the site.
- Parking to support the maximum population on-site approximately (188 designated spaces; 112 overflow spaces).
- A 260,000 bolted steel water tank, approximately 60 feet wide and 13 feet high.
- A recreation rope course consisting of two 40-foot ladders connected by rope, and a 3000-foot zip line for recreational purposes.
- Continued use of outdoor ball field for band practice (sic) until such time that the multi-purpose facility is available for such practice.

Based on this list, it is apparent that there is no compatibility with the community character of Mussey Grade Road. Indeed, the project as it is proposed, and in its alternatives, is completely incompatible with Mussey Grade Road and environs. The claim by the Army that the facility, in all of its building space, parking lots and other considerable impacts, is compatible ignores the character of Mussey Grade Road and is insufficient with regard to the Community Character goal of the Ramona Community Plan. This is the major reason why the Ramona Community

Planning Group has twice voted against this project, rejecting out of hand the argument of compatibility with the community character of the area. This issue alone is sufficient to reject this project under the law. JCC21

Land Use, General Land Use Goal: ("Provide a land use which will give the Ramona Community Planning Area the opportunity to remain economically and socially varied. Conserve the bet of the Ramona of yesterday while planning for the Ramona of tomorrow.") Under this goal, the Army states that the expanded camping and retreat facility "provides substantial benefit to the community." However, in other parts of the DEIR, the Army has clearly said that the camp support staff will not live in Ramona, that is off the facility site. During both past Ramona Community Planning Group Subcommittee and Ramona Community Planning Group meetings, the Army has stated that the camp will not provide any appreciable job opportunities for the Ramona community. Even more discouraging, the Army plans to provision the camp through its own contacts and bidding process and not by relying on local merchants. Additionally, the Army, as shown above, plans to operate a camp store, where it will sell necessaries. This store, obviously a purely commercial element in the overall commercial nature of the proposed expansion and a method to direct the flow of dollars to the Army and not Ramona, would be the first store to operate on Mussey Grade Road in decades and would not be open to the general public. Furthermore, the Army alone will control access to the facility. It will not be open to the general public for free enjoyment and use. It will constitute an encapsulated entity, separated from the people surrounding it as well as the larger Ramona community and operated for the Army's own purposes. The economic and social benefits the Army plans for Ramona are a chimera.

Under the Conservation and Open Space goals, similar to the General Plan, refer to comments above in similar categories.

Ramona Design Guidelines (pp. 2.7-16 – 2.7 – 17)

Under preservation of historic resources, the Army neglects in throughout the DEIR to treat the Mussey Grade Road itself as a historical resource and its preservation as it remains today is in fact questionable if the proposed expansion in any of its suggested alternatives is approved. There is no recognition by the Army of the uniqueness of the state-recognized history of the road and its environs. The impacts the Army contemplates to the road are essentially unmitigated due to the massive building and population the Army plans to introduce to the area. See all relevant comments on this point throughout this chapter. JCC22

2.7.4 Mitigation Measures (P. 2.7-17)

It is noteworthy that the DEIR admits to significant and unmitigable impacts flowing from this project in this section, where it is stated: JCC23

"Although impacts to sensitive biological habitats have been either avoided or mitigated to below a level of significance, such impacts associated with the Retreat Center and

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC21:
The County does not concur with this comment. The comment implies that project benefits to the community would be solely in the form of job opportunities and/or economic benefits. However, the applicant does not suggest that the project would benefit the community in this way. The project would benefit the community by providing a camp/retreat facility that may be used by all members of the community.

Response to Comment JCC22:
The County does not concur with this comment. Please see DEIR response to comment JCC2. Additionally, the proposed project will not result in an impact to Mussey Grade Road. No improvements to Mussey Grade Road are proposed and the project will not alter the existing condition of the road (see Final EIR Section 6.2.2 Transportation/Traffic). Also, the camp is not visible from Mussey Grade Road due to intervening topography and vegetation. No significant impact to historic resources as a result of the proposed project has been identified.

Response to Comment JCC23:
The Final EIR concludes that Reduced Project Alternatives I and II would avoid significant unmitigated impacts to biological resources. Please see Final EIR Chapter 4.0. Therefore, the County disagrees that these alternatives would "not pass biological muster".

access road conflict with Policy 9 of the General Plan Conservation Element. The existence of two project alternatives, discussed in EIR Chapter 4, that avoid this impact renders this conflict significant and unmitigable under the proposed project." JCC23 (cont'd)

In other words, the Army is bargaining to have large numbers, but is aware that the largest number, 748, is impossibility due to unmitigable impacts. What the Army ignores is that the Alternatives also do not pass biological muster. See the Biology Chapter in this Comment Report. JCC24

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC24:

The Applicant Preferred Project is the project evaluated in the EIR. Pursuant to the mandates of CEQA, because significant and unavoidable impacts have been identified associated with the Applicant's Preferred Project, alternatives to the proposed project have been identified, are evaluated, and recommended to be adopted that avoid the significant and unavoidable impacts associated with the Applicant's Preferred Project. This information is presented in the April 2008 Revised Draft EIR.

Diane Conklin moved to the Mussey Grade Road area from Geneva, Switzerland and Bonn, Germany, where she worked with a specialty in Human Rights as a Research and Development Program Specialist for the United Nations Volunteers (UNV), a program of the United Nations Development Program (UNDP). She also was the program manager and general editor for the book Volunteers Against Conflict, published by United Nations University Press, Tokyo, Japan, in 1996. Since moving to the Mussey Grade area in 1999 she has organized and sustained on a volunteer basis the Mussey Grade Road Alliance, which is responsible for preserving and protecting Mussey Grade Road. In addition, she is the President of the Ramona Tree Trust, a 501(c) (3) organization, and has, with the Trust, planted trees on SR-67 (Main Street). She holds a B.A. Degree in Mass Communications from Florida State University and a J.D. from the University of Wyoming.

JCC25

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, COMMUNITY CHARACTER CHAPTER (JCC SERIES) DATED MARCH 28, 2005 (CONTINUED)

Response to Comment JCC25:
Biography of Author, response not required.

Attached Correspondence:

- Letter dated March 30, 2004, to Diane Conklin, Mussey Grade Road Alliance, from State Historic Preservation Officer regarding designation of Mussey Grade Road Site as a California Point of Historical Interest.
- Letter dated March 12, 2001, to State Historic Preservation Officer, from Supervisor Horn, regarding nomination of Mussey Grade Road on the California Register of Historical Resources.
- Letter dated December 12, 2000, to Board of Supervisors, from Supervisor Dianne Jacob, regarding approval of County CAO to draft letter to State Office of Historic Preservation for listing Mussey Grade Road on the California Register of Historic Resources.
- Letter dated March 23, 2005, from Ramona Municipal Water District to DPLU, regarding emergency evacuation routes.
- Letter dated March 21, 2005, from Kristi Mansolf (Ramona resident) to Ramona Municipal Water District, regarding emergency access.

STATE OF CALIFORNIA – THE RESOURCES AGENCY

Arnold Schwarzenegger, Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov

JCC
Attachment

March 30, 2004

Ms. Diane Conklin
Mussey Grade Road Alliance
PO Box 683
Ramona, CA 92065

Dear Ms. Conklin:

I am pleased to inform you that Mussey Grade Road Site was made a California Point of Historical Interest on November 7, 2003. At its meeting in Pasadena, the State Historical Resources Commission voted unanimously to approve the designation. Thank you for appearing at the meeting and giving us all a sense of the road's significance to the community of Ramona. I wish the Alliance every success in their preservation efforts.

Sincerely,

Dr. Knox Mellon
State Historic Preservation Officer

JCC
Attachment

Bill Horn
CHAIRMAN
Supervisor, Fifth District
San Diego County Board of Supervisors

March 12, 2001

Knox Mellon
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

Dear Mr. Mellon;

I am writing to express the support of the San Diego County Board of Supervisors for the listing of Mussey Grade Road on the California Register of Historical Resources. It is clear that this road embodies and reflects important periods in the history and prehistory of San Diego County and the State of California.

The road is named after an early settler of the region. Prior to its use as a road, Mussey Grade Road was used as a major Native American trail. During the Colonial Period, the trail became a major route for Spanish Missionaries, who used it to reach San Diego County's interior region. It was subsequently used as the primary road that linked San Diego to the gold mining areas of Julian and other areas of the Back Country. Beginning in the 1880's, a rail line linked the City of San Diego with the town of Foster, located in the area now covered by San Vicente Reservoir. Mussey Grade Road linked the town of Foster with the Back Country. Interestingly, the town of Foster was named for a former San Diego Supervisor. The road was subsequently used as a supply route for the construction of the dam at San Vicente Reservoir in the 1940's and still serves the modern town of Ramona.

Mussey Grade Road is an excellent candidate for nomination and is clearly significant at both the local and state level. It is quite likely that the road would also be eligible for the National Register. On December 12, 2000, the Board of Supervisors voted unanimously to support the listing of Mussey Grade Road on the California Register of Historical Resources. Accordingly, I urge you to approve the request of the Mussey Grade Road Alliance and list this road on the State's Register of Historical Resources.

Thank you in advance for your consideration of this matter.

Sincerely,

Bill Horn
Chairman

1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470
☎ (619) 531-5555 • FAX (619) 685-2555 • Bill.Horn@co.san-diego.ca.us

DIANNE JACOB
CHAIRWOMAN
SUPERVISOR, SECOND DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

DATE: December 12, 2000

TO: Board of Supervisors

RE: **Listing Mussey Grade Road on the California Register of Historical Resources**

Summary:
Approval of this item would express the Board's support for listing Mussey Grade Road on the California Register of Historical Resources.

Recommendation:
CHAIRWOMAN JACOB

Direct the Chief Administrative Officer to draft a letter for the Chair's signature to the State Office of Historic Preservation expressing the Board's support for listing Mussey Grade Road on the California Register of Historical Resources.

Fiscal Impact:
This action will result in no cost to the County.

Background
Mussey Grade Road, located in the community of Ramona, California, is a 5.3 mile winding two-lane paved road that travels through an interior live oak habitat. There is evidence that the route which Mussey Grade Road follows was used in the past by the members of a Kumeyaay tribal village which was submerged by Lake San Vicente.

Mussey Grade Road was built by the County of San Diego in 1886 as an alternative to the Atkinson Brothers' toll road and served as the primary link between the City of San Diego and the back country. The road was used to travel routes east to the desert and for transporting provisions, mail, and

1600 PACIFIC HIGHWAY, ROOM 335 • SAN DIEGO, CALIFORNIA 92101-2470
(619) 531-5522 • FAX: (619) 696-7253 • TOLL FREE: 800-652-7322
250 E. MAIN STREET, SUITE 169 • EL CAJON, CALIFORNIA 92020-3941
www.dianne.com

JCC
Attachment

travelers to the communities of Ramona and Julian. In 1926, the road received its first layer of concrete and in the mid-1930s, an elaborate system of concrete culverts, believed to have been constructed by WPA work crews, were built to prevent the flooding of the road by San Vicente Creek.

In the early 1940s, the road was used to bring equipment and supplies to the San Vicente Reservoir construction site. In 1943, the road ceased to be a thoroughfare as the lower portions of the road were covered by the San Vicente Lake. Today, the remaining segments of the road serve as a scenic corridor which provides access to the homes and ranches located along Mussey Grade Road.

The Mussey Grade Road Alliance has recently submitted an application to the State Office of Historic Preservation requesting that the road be listed on the California Register of Historical Resources. Because of the important cultural and historic significance of Mussey Grade Road, I urge you to join me in supporting the efforts to list Mussey Grade Road on the California Register of Historic Resources.

Respectfully Submitted,

DIANNE JACOB
Chairwoman

JCC
Attachment

SUPERVISORIAL DISTRICT: District 2

COUNTY COUNSEL APPROVAL: Form and Legality [ ] Yes [ ] N/A
[ ] Resolution [ ]Standard [ ]Ordinance

CHIEF FINANCIAL OFFICER/AUDITOR REVIEW: [ ] Yes [X] N/A
4 VOTES: [ ] Yes [X] No

CONTRACT REVIEW PANEL: [ ] Approved [X] N/A

CONTRACT NUMBER(S):

PREVIOUS RELEVANT BOARD ACTION:

BOARD POLICIES APPLICABLE:

~~CITIZEN COMMITTEE STATEMENT:~~

CONCURRENCE(S):

ORIGINATING DEPARTMENT: Supervisor Dianne Jacob, District Two

CONTACT PERSON: Mike Kulis 531-5522

December 12, 2000
MEETING DATE

back country...

JCC
Attachment

north county

BY BOB RODRIGUEZ

Grade reveals shaded dells, peace and quiet

Staff Photos by Bob Rodrig

Mussey Grade Road in Ramona is a short stretch of descending highway made for persons who are in no hurry with no particular place to go.

In short, it has a beginning, a middle and an end. It is a scenic route, nothing more. A sign at the crest of Mussey Grade shows a wiggly arrow and the words "next four miles." A sign near the end pointedly reads, "road ends-800 feet. And it does.

But in between are numerous scenes attractive to the eye and pleasing to the mind. Mussey Grade offers an interesting look at back-country peace and quiet. Almost the entire two-lane roadway is in deep shadows because of the heavy growths of old trees: live oak, sycamore and others whose bulky branches screen the sun's rays.

Not too many persons live along Mussey Grade. There are a number of homes and ranches, besides the tiny settlement of Fernbrook near the road's termination, whose names provide an idea about the area's flavor:

Wildwood, Oak Haven, Seven Meadows and "cho del Cielo (Heavenly Ranch) are among the es.

There are not too many straight stretches. Most of Mussey Grade consists of curves that demand attention of drivers. A possibility to make the sightseeing trip safer is for one person to drive down and another to drive up.

Because of the fact that various types of fences stand immediately next to both sides of the road, there are few spots for pulling off. However, because of the low speed required to safely navigate Mussey Grade, there are plenty of chances to see the scenery. And there are some locations where cars can get off the road.

The fences are to contain livestock raised by those who live in the area and to keep out previous visitors who apparently have given a black eye to tourists. Signs advising against trespassing and hunting are common. There is a sign near the bottom of Mussey Grade that reads, "no hunting, no fishing, no trespassing, no nuthin."

Fernbrook is just about at the end of the road although Mussey Grade descends about another mile from the small community before smacking against a formidable fence.

Several older homes are visible from the road, including the picturesque Atkinson house, a former toll station at the northern end of what used to be the San Diego-Julian Toll Road, when the Julian gold rush was at its height in the late 1800s.

The comfortable-looking house surrounded by live oak trees sports a sign: "not for sale or rent."

Mussey Grade was built in 1891 and was named after a veteran of the war that took California from Mexico. The road now ends at the north side of Lake San Vicente, which cannot be reached from Mussey Grade. It once provided a route to Lakeside, but the creation of the lake ended that.

Privacy seems to be the aim of those persons who live down in the descending hollows and shaded dells along Mussey Grade. Visitors to the scenic area can feel envy because of the unusual peace and quiet.

Mussey Grade can be reached via state Highway 67 from the Poway area and state Highway 78 fr the Escondido area. In the latter case, driv should turn west on Ramona's Main Street. T county's Dos Picos Park is just off Highway where the turnoff is located for Mussey Grade, a is a good spot for a picnic after taking the spi route for persons in no hurry.

JCC
Attachment

RAMONA MUNICIPAL WATER DISTRICT
105 EARLHAM STREET
RAMONA, CA 92065-1599
(760) 789-1330 - Phone
(760) 788-2202 - Fax

FAX COVER SHEET

TO:	**Diane Conklin**
FAX NUMBER:	**760-788-5479**
FROM:	Sherry McGarry
DATE:	March 23, 2005
PAGES:	**2** including cover sheet

Attached please find Motion from Board Meeting March 22.

JCC
Attachment

RAMONA MUNICIPAL WATER DISTRICT
105 Earlham Street
Ramona, CA 92065-1599
Telephone:
(760) 789-1330

March 23, 2005

San Diego County
Department of Planning and Land Use
5201 Ruffin Road
San Diego, CA. 92123

RE: P70-379W2, LOG NO. 98-14-023; SCH NO. 2000031058; SALVATION ARMY DIVISIONAL CAMP AND RETREAT

The Ramona Municipal Water District, as the responsible agency, submits this supplemental comment to the draft EIR for the extension of the Salvation Army Camp in consideration of the Cedar Fire and potential impact upon Mussey Grade Road in the event an evacuation during a major catastrophe such as the Cedar Fire.

Be advised that the project require a secondary access onto Dos Picos Park Road or Highway 67, and not onto Mussey Grade Road south of Dos Picos Park Road.

Please consider this comment as an additional condition that shall be included in the Major Use Permit to mitigate for Hazards and Public Safety impacts related to potential fires in the project area under Section 9.1.3 Hazards and Hazardous Materials, item MM 2.3.b.

Thomas L. Brammell
General Manager

JCC
Attachment

March 21, 2005

Robert E. Krysak, President
Board of Directors
Ramona Municipal Water District
105 Earlham St.
Ramona, CA 92065

RE: Secondary Access for the Salvation Army Project

The Salvation Army Camp Major Use Permit (MUP) expansion, as proposed, and the majority of the alternatives, have the potential to bring in hundreds of people, greatly impacting the Mussey Grade Rd. area.

During the Cedar fire, main circulation arteries were closed to Ramona. With two lanes and only one way in and out, Mussey Grade Rd. has displayed its vulnerability to the impacts of fire on more than one occasion. Any changes proposed for this area must be responsibly considered for potential impacts. When considering large projects on Mussey Grade Rd., one must take into account the entire number of people that need to evacuate from Mussey Grade Rd., and the time it will take to move them.

Shelter in place has been removed from the Salvation Army project Draft Environmental Impact Report (DEIR). Evacuation remains the only option.

As a concerned individual, who lives in the vicinity of the proposed Salvation Army project, and with an interest in evacuation planning, I request that you require a secondary access to the Mussey Grade area for the Salvation Army project, in the interest of public safety.

Kristi Mansolf

Kristi Mansolf
15873 Hwy 67
Ramona, CA 92065

MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

P.O. Box 683
Ramona, CA 92065
(760) 787 - 0794 T
(706) 788 - 5479 F

Steering Committee:
Diane Conklin, Spokesperson
Carol Levin, Treasurer
Bruce Meador, Member
Donna Schneider, Member
Joseph Mitchell, Member

TRAFFIC CHAPTER

By Ken Gamble

1

Slide 1

Salvation Army Camp and Retreat EIR Review

Transportation/Traffic
Ken Gamble - Resident

This presentation addresses the negative impacts that expanding the use and capacity of the Salvation Army Camp will have on our Community. My specific interest is the increased traffic levels on our local roads. **JT1**

My concerns are:
Public Safety **JT2**

Slide 2

Overview

- Issues that affect Ramona Residents
- Issues that affect Mussey Grade Road residents
- Current road condition
- Mitigation of impact is not appropriate

The most significant impact of the camp on traffic will be the additional bus, van and cars that will be turning onto Mussey Grade Road. This added traffic will add to significant traffic delays for the local community. In addition, the existing road functions adequately for the existing legal population but the additional traffic will significantly increase the likelihood of traffic accidents on Mussey Grade road and at the HWY 67 intersection.

Slide 3

Proposed 748 users per day

Significant increase in the number of users of the Divisional Camp and Conference Center. **JT3**

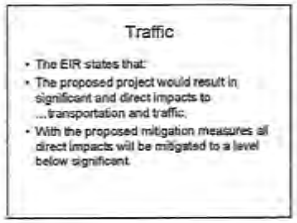
RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

Response to Comment JT1:
Please see DEIR response to comment JT2.

Response to Comment JT2:
The County does not concur with this comment. The project traffic will add to existing delays experienced in the local community and these delay increases are fully disclosed in Table 4-2a of the Traffic Impact Assessment (TIA) (Final EIR, Appendix E). The project traffic contributes to the cumulative impact identified at the SR-67/Archie Moore Road (unsignalized); SR-67/Mussey Grade Road (unsignalized), and SR-67/Dye Road/Highland Valley Road (signalized) intersections. The project would mitigate its contribution to the cumulative traffic impacts by paying the required Transportation Impact Fee (TIF). However, based on the County's traffic impact significance criteria, project-level traffic impacts (increase in delays) are not significant (see Final EIR, section 6.2.2). The very small amount of traffic being added by the project would not be expected to significantly change this accident rate. An increase in traffic volume, by itself, does not make a road more dangerous, and the project would not make any changes to Mussey Grade Road. Furthermore, Mussey Grade Road would operate at better than Level of Service (LOS) C with or without the project (Table 4-3 of Appendix E, Final EIR).

Response to Comment JT3:
Please see DEIR response to comment JT2.

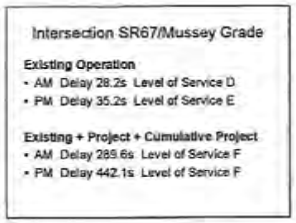
Slide 4



We would like to propose that there is really no way to mitigate the impact that this camp and conference center would have on the local infrastructure without adversely affecting the rural beauty and the quality of life in and around the Ramona area.

JT4

Slide 5



The analysis of the existing traffic delays appears to be well researched.

Please note the order of magnitude of delays that will occur at this intersection with the addition of this project plus the other proposed projects.

Note the PM delay of over 7 minutes at the intersection of SR67 and Mussey Grade Road.

Slide 6

In the mornings, significant traffic is moving South on HWY 67 towards Poway, Lakeside and San Diego. Currently there is light traffic northbound in the mornings, so it is fairly easy to cross traffic to pull into the refuge lane. Right of way goes first to Northbound traffic, then to cars turning left onto Mussey Grade – after these clear then it is possible to turn left into this refuge lane.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT4:

The Final EIR concluded that project impacts can be mitigated without affecting the rural beauty and quality of life in and around Ramona (see Final EIR, Chapters 2.5 and 2.7). Please also see DEIR response to comment JCC2. The remainder of the comment is noted.

Slide 7

The EIR states that current traffic conditions are Level of Service D in the mornings and Level of Service E in the afternoons.

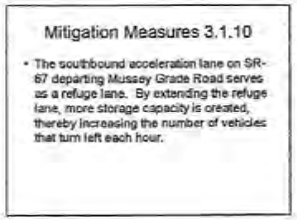
Slide 8

With the addition of this proposed project and other projects the level of service would decline to F.

Nowhere in this report could I find reference to the high number of head on collisions that occur on SR67. In addition, the number of fatalities is high on this section of the road due to traffic turning across oncoming traffic. This also is not discussed.

This must be addressed.

Slide 9



There are 3 traffic mitigation measures proposed in the EIR. Please review these carefully and I believe that you will see that they do not mitigate the situation or improve safety in any way.

JT5

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT5:

The County does not concur with this comment. Traffic analyses for land use projects typically do not include information on traffic accidents. Nonetheless, according to data from CALTRANS, there were seven accidents on SR 67 within 500 feet of the intersection of Mussey Grade Road from January 1, 2005 through December 31, 2008. One of these accidents was a head on collision, and there were no fatalities in any of these accidents. The comment provided no evidence that project traffic will result in a significant increase in accidents the three days a week that the maximum project traffic occurs. The accident rate would not increase with the very small increase in project traffic. The percentage increase over existing traffic during the combined peak hours on these three days a week is approximately 0.8 percent at the SR-67/Mussey Grade Road intersection. An increase in traffic volume, by itself, does not make a road more dangerous.

The Draft EIR (2005) identified three mitigation measures to address cumulative traffic impacts. In addition, the Draft EIR identified the potential payment of a Traffic Impact Fee (TIF) if the County adopted the TIF program. Payment of the TIF would mitigate the project's contribution to the cumulative traffic impacts. The County adopted the TIF program, and the traffic impact analysis was updated to clarify that the TIF program is in place and that the only mitigation needed for cumulative traffic impacts is the payment of the TIF.

Slide 10

Mitigation Measures 3.1.10

- Widening the northbound SR67 to two lanes between Mussey Grade Road and Dye Road/Highland Valley Road would increase the number of vehicles per hour that can be accommodated. This would result in less delay at the intersection producing higher speeds along this segment. This resultant increase in speed would mitigate the project's contribution to the cumulative traffic impacts.

Slide 11

Mitigation Meaures

Lengthening the refuge lane southbound on hwy67 will not improve the situation. This traffic will still need to merge to one lane at the end of the refuge lane.

Adding an additional lane northbound on HWY67 will not increase traffic thru light at Dye road.

Slide 12

Issues that affect Mussey Grade Residents

- Road Quality of Mussey Grade
  - Road Width
  - Shoulder Width
  - Significant Potholes
  - Blind Corners
  - Speed Limit
  - Flooding/Water on road

JT6

A left turn onto SR67 from Mussey Grade road in the afternoon is difficult. There is a steady flow of traffic on N SR67 and a light flow of traffic Southbound on SR67 turning onto Mussey Grade. It is accomplished with the kindness of the Ramona residents who slow to create a break in traffic that you may enter. After this clears you still need to yield to traffic turning left onto Mussey Grade.
The lengthened refuge lane will not help this situation since getting into the refuge lane is the problem, not merging with southbound traffic.
The road width and shoulder width are less than described in the EIR. Please see attached photographs which show lack of shoulder in the vicinity of the camp. There are 2 blind corners just below the Y for Dos Picos Park. These, coupled with a lack of a shoulder, make the road very dangerous for pedestrians or cyclists with the added traffic.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT6:

See DEIR response to comment JT5. The Final EIR acknowledges that the left-turn out from Mussey Grade Road is difficult. The intersection LOS is reported to be LOS D and LOS F in the existing AM/PM peak hours, respectively. The Final EIR concludes that a significant cumulative traffic impact would occur to this intersection (see Final EIR, Impact 3.1.10b). The project will pay the required TIF. Payment of the TIF would mitigate the project's contribution to the cumulative traffic impact (see Final EIR, page 3-13 and 3-14).

The shoulder widths were measured at several locations as shown on page 7 of the traffic study. It is not practical or reasonable to measure shoulder width at every location on Mussey Grade Road. Furthermore, the rural characteristics of the roadway (no curb/gutter) make the shoulder availability subject to change with weather and erosion. Moreover, improvements to the roadway shoulders may induce greater speeds, which may not be desirable for the rural character of the area.

The comment has provided no evidence that a nominal increase in traffic volume due to the project will result in undue hardship on cyclists or pedestrians. Linscott, Law & Greenspan Engineers (LLG) conducted a pedestrian/cyclist count at 10-minute intervals during the PM peak hour of 4:30 – 5:30 on Wednesday, October 5, 2005. This is the time of day that inbound camp trips would be expected. The results of the survey showed only 1 pedestrian in the hour. LLG has not observed pedestrian/cyclist activity during other times of the day on previous field visits. Given the very limited pedestrian/cyclist activity on Mussey Grade Road and the small amount of project traffic which is primarily off-peak and on a limited number of days per week, traffic added by the project would not increase the danger to pedestrians/cyclists.

The project will not increase pedestrian or cyclist activity on the roadway. Mussey Grade Road is typical of many rural County roadways in Ramona and elsewhere. Mussey Grade Road meets fire code requirements in terms of width, paving and posting and is in the County Maintained Road System. Fire apparatus roads require improved width of 24 feet (Consolidated Fire Code, section 96.1.503.2.1). Mussey Grade Road is a two lane roadway. The total paved road width varies from 26 to 36 feet which exceeds the 24-foot minimum requirement. Widening of Mussey Grade Road at this location is not recommended due to environmental constraints discussed in the traffic study. Furthermore, the addition of 275 ADT attributed to the project would not necessitate widening the road.

Slide 13

Existing Conditions Report 3.1

- Mussey Grade Road is a two-lane undivided road. It is classified to have a bike lane. Mussey Grade Road generally has 4.5 foot paved shoulders. The posted speed limit is 50 mph.
- The narrowest width of Mussey Grade Road is 26 feet with 1-3 foot shoulders.

Conditions disclosed in the report are incorrect and must be revised. They deceive the reader to understand that the road can be driven at high speeds and that a nice shoulder currently exists. Please see photos below.

Slide 14

Actual Conditons

- Speed limit is 40 and 45 mph
- Many blind Corners
- Road condition is very poor
- No shoulder or little shoulder exists in many locations
- Water and thick mud on roadway in rains
- Erosion threatens road in some locations

Slide 15

Personal Concerns

- With additional traffic (248 average daily trips) road will be less safe. Buses, Vans, and Carpool will have drivers who are unfamiliar with our road.
- Cycling/Running
- Walking on road with family
- 3 sons age 16, 15, 12 - new drivers
- Cattle loose on road

JT7

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

[CONTINUED]

Response to Comment JT7:

The County does not concur with this comment. The EIR does not state or imply that the roadway can be driven at high speeds or that a "nice" shoulder exists. Page 3 of the TIA clearly states that "curbside parking is not available", and that "shoulder width decreases further south on Mussey Grade Road." The traffic study identifies Mussey Grade Road as having a posted speed limit of 50 mph near SR-67, and a width varying from 26-32 feet, the former for a short section near Mahogany Ranch Road. Please see DEIR responses to comments JT5 and JT6. There is no reason to believe that drivers unfamiliar with this area would not drive safely.

Slide 16

Mile Marker .5

The water on the wide shoulder of the road in the upper areas force cyclist into the traffic lanes.

Slide 17

Mile Marker .6

Slide 18

Mile Marker 1.1

As you turn left at the Y for Dos Picos park the road condition and shoulder width deteriorates quickly. This photograph is very typical of the road condition from this Y until the Camp entrance.

JT8

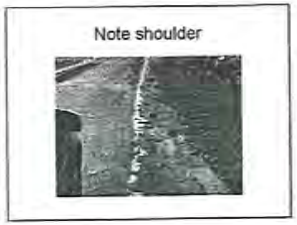
RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT8:

Please see DEIR response to comment JT6. The TIA accurately describes the Mussey Grade Road (see page 3 and 4 of the TIA, Appendix E of the Final EIR). Mussey Grade Road is typical of many rural County roadways in Ramona and elsewhere, in that it is narrow, with blind corners and unimproved shoulders that are subject to flooding and slides. Mussey Grade Road meets fire code requirements in terms of width, paving and posting and is in the County Maintained Road System.

Slide 19



Added traffic volume of Buses and Vans would make it very difficult for cyclists and pedestrians along this section of road.

JT9

Slide 20

Please note both the condition of the road and the lack of shoulder. This photograph was taken 200 yards from the entrance to the Camp.

Slide 21

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT9:

Please see DEIR responses to comments JT6 and JT8.

Slide 22

No Shoulder

The lack of shoulder along this section of road has been an ongoing issue for many years. It is not new. Please note vegetation and traffic sign post abutting pavement.

JT10

Slide 23

Northbound Shoulder on Blind Corner

Please note on this blind corner the lack of a shoulder, the rocks and debris in the road. In addition, potholes (foreground) populate the road in large numbers.

Slide 24

Note severe erosion at side of the road. This is just north of the entrance to the camp. Large Oaks and sycamores fall across the road due to erosion, fire damage or just old age. As a driver you can come around a blind corner and a tree can have fallen in the roadway ahead. Drivers unfamiliar to these conditions may cause harm to their passengers as well as oncoming traffic.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT10:

Please see DEIR responses to comments JT6 and JT8. The County maintains Mussey Grad Road as needed and recently rehabilitated the road. Maintenance activities include litter pick up, vegetation management, silt removal, general roadway cleanup activities, culvert inspection and culvert cleaning where required.

Slide 25

This photograph was taken within sight of the camp entrance. Note the severe erosion which threatens the underpinnings of the road. This location is where the previous photo (slide 24) was taken from.

JT11

Slide 26

Entrance to the camp.

Slide 27

The road conditions and drainage at the entrance to the camp have been poorly maintained over the past 10 years.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT11:

Mussey Grade road is a County maintained road. A section of the west branch of the San Vicente Creek crosses under Mussey Grade Road in a box culvert just north of the Camp entrance. This portion of the road was recently rehabilitated by the County. There are no significant erosion or drainage problems near the camp entrance.

The project proposes to pave the entrance to the camp which would reduce erosion potential and associated with the paving, address erosion issues associated with the camp entrance road.

Slide 28

South of Camp Entrance

This is a view just past the camp looking back north towards the camp. Note the lack of shoulder and the potholes at this location.

Slide 29

Mussey Grade Road

- Road structure is unsafe for additional traffic. (no shoulder, drainage, blind corners)
- Current road condition is poor. (potholes)

This road works for the current residents. Much of the proposed zoning is 20-40 acre minimum in the area south of Dos Picos Road. The population is light and dispersed. The current traffic loads are light. The only concentration of people is at MG Village, which is permitted for 33 year-round units yet currently has over 100 units occupied. The county is aware of the 67+ illegally occupied units that generate nearly 200 ADTs, but has been very slow in code enforcement. I would estimate that this issue will be resolved in 2005.

Slide 30

Summary

- Ramona Residents will be adversely affected.
- Mussey Grade Road residents
  - Misrepresentation of road structure
  - Unsafe for additional traffic
- Mitigation of impact is not appropriate

In summary, Mussey Grade Road works for the current residents. It is a curvy, narrow, beautiful road with a non-existent shoulder below the turnoff for Dos Picos Park. It cannot support the additional demand of the Salvation Army's proposed expansion. It would create a safety issue that would place the current residents as well as the campers in jeopardy, and raise the question the county's liability in the case of accidents should this expansion be approved.

JT12

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT12:

Please see DEIR responses to comments JT6 and JT8. As to the County's potential liability, an increase in traffic volume, by itself, does not make a road more dangerous.

Ken Gamble – Board of Director and Vice President of New Business Development, Manufacturing Engineering

Quatro Composites

Ken Gamble is a senior executive with a demonstrated record of achievement in the composites industry including: design, development, structural analysis & optimization, manufacturing, engineering, testing, modeling and IT systems. Visionary ideas and creativity are blended with practical hands-on experience to execute revolutionary products. Mr. Gamble has substantial product creation experience with significant expertise in managing key functional areas for product launch. Innovation, documentation and execution have been applied to the following industries: Aerospace, Air Transportation, Medical, Military, Automotive, Construction and Wholesale Consumer Goods. He spent seven years in Boeing's renowned Advanced Composites Manufacturing program, four years developing Trek's entire composite bike program (including the development of the first monocoque composite Y-bike in the industry), and two years as an engineering professor at Western Washington University (curriculum included composites analysis, quality control, design). In 1997, Mr. Gamble co-founded Quatro Composites. Credentials include BS Aerospace Engineering (Purdue University), MS Manufacturing Systems Engineering (University of Wisconsin – combined graduate programs of mechanical & industrial engineering and business management), and Teachers Credential (chemistry). Skills outside of composites include systems knowledge, CAD/CAM, CNC, and equipment fabrication. Affiliations and interests include Boy Scouts of America (Asst. Scout Master), Society of Mechanical Engineers and home construction.

Mr. Gamble resides with his wife, Joanne, on a 50-acre parcel on Mussey Grade Road with their three sons.

Addendum to Transportation/Traffic Analysis

This addendum supplements the Salvation Army Camp and Retreat EIR Review, Transportation/Traffic by Ken Gamble[1].

Items:

1. While the Conference Center recommends van, bus and carpool transportation, there is no means by which this is can be enforced[2]. All transportation authorities recommend multiple-occupancy transportation. However, most people do not pay attention to these recommendations, as evidenced by the predominance of single occupancy vehicles on San Diego's roads at commute time. Businesses and facilities all over San Diego County actively support carpooling, and offer privileged parking to carpoolers. Dedicated carpool slots generally make up no more than a few percent of parking spaces at any given facility, an indication of the lack of popularity of this mode of transportation. **JT13**
   There is no reason to assume that the Salvation Army (SA) facility will be any more successful with their recommendations. While recommendations may be put into place by current Salvation Army facility management, these would not be binding upon future management or owners in any way. The traffic analysis should not use unenforceable and unrealistic estimates of vehicle occupancy. Instead, numbers more typical of standard usage in Southern California should be adopted.
   Enforcing carpooling & mass transportation would increase long-term costs for the applicant. First, the SA would have to obtain or rent more vans and busses, and would bear the costs of ferrying occupants to and from the facility. Secondly, enforcing carpooling or mass transport entails a loss of flexibility that may make the facility less attractive to potential customers. Hence, there is a financial disincentive to carpooling/mass transportation that may in the future outweigh initial reasons for recommending it, particularly once an EIR is approved.
   A more realistic view is that usage will match the availability of resources at the facility - in other words that the number of cars at the facility will be determined by the number of parking spaces when the facility is running at full occupancy. Carpooling and other forms of mass transportations will be enforced only if there are no other choices.
2. In the Linscott, Law and Greenspan (LL&G) traffic analysis, this car-pooling recommendation was incorporated into their traffic generation estimate[3]. This was based on the estimated usage of the facility as well as comparison with a purportedly similar camp. This makes the assumption that future usage will be similar to past usage, and that the uses of the other, unrelated camp and the expanded SA camp are and will remain identical. The fact that this facility can be and has been used as a conference center increases the likelihood that attendees will arrive in passenger vehicles. **JT14**
   The applicant should re-estimate the traffic usage levels with VOR more typical of traffic in Southern California and not based upon unenforceable preferences .

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT13:
The County does not concur with this comment. The premise of the comment is that the VORs used in the traffic analysis are incorrect. The assumptions about bussing, vanpool, and carpool made in the trip generation methodology (section 4.1 of the TIA, Appendix E of the Final EIR) are based on the best available data -- the Salvation Army's experience with the existing camp/retreat. In addition, data was obtained from the similar Oakbridge Camp a few miles from the project site. The Oakbridge Camp's trip generation characteristics support the VOR assumptions in the Salvation Army Divisional Camp and Retreat TIA (Table 4-1 and section 4.1 of Appendix E of the Final EIR). It would be inaccurate to assume no-carpooling given the fact that significant vanpooling already exists, and given the project's relatively remote location.

The trip generation methodology is derived from operational characteristics of the project (as explained above), not the proposed parking supply.

Finally, it should be reiterated that the project does not generate traffic during the AM and PM peak hours every day, but only on weekends and during the PM peak hour on Fridays. On many days, the project will generate virtually no traffic because the campers would arrive on Monday afternoons and depart on Saturday mornings. Retreat guest arrive on Friday evenings and depart Sunday afternoons. Therefore, site would generate very little traffic on the other days of the week.

JT13 Footnotes 1 and 2:
Footnotes 1 and 2 indicate the source of information as provided in this comment. The County has considered this information in responding to comment JT13.

Response to Comment JT14:
The County does not concur with this comment. The analysis is not based on "unenforceable preferences" as stated in the comment, but on a description and operating characteristics provided by the Salvation Army as described in the TIA. Please see DEIR response to comment JT13 regarding VOR assumptions. Given the basis of the VOR assumptions, it is logical to assume that future vanpooling activity will be similar to past vanpooling activity. Please also see DEIR response to comment JT15 below.

JT14 Footnote 3:
Footnote 3 indicates the source of information as provided in this comment. The County has considered this information in responding to comment JT14.

3. In Section 13.0 of the LL&G analysis (Appendix E), it is recommended that the permit be conditional on achieving VORs similar to those in the proposal. This places a tremendous onus of enforcement upon the County, because the measurements are difficult to make: **JT15**
   - Unlike occupancy, which can be spot-checked quickly, determining VOR requires visually monitoring of incoming traffic over a substantial period in order to determine the average to a reasonable level of statistical accuracy.
   - Measurements would need to be averaged over different usage periods, since VOR is an average and differences in the types of camp usage will systematically affect the results.
   - Because the measurements take a while, they can be influenced while they are in progress. SOVs can be denied admittance to the camp; staff driving alone can choose not to enter while the inspection is underway, etc.
   - Because it is well known that County enforcement is understaffed, there will be little incentive on the part of the applicant to validate that its VORs are near the acceptable levels. It is highly unlikely that the County would have the resources to regularly check compliance.

   This is not a practical or enforceable recommendation and should not be requested.
4. If we use the more realistic estimate that the number of ADTs will be driven by the available parking, we must assume up to 300 vehicles at the facility (188 dedicated and 112 overflow spaces). Using LL&G's estimate of 2 ADTs per vehicle, this would result in 600 ADTs for passenger cars. Assuming a VOR of 1.2 (still probably optimistic for Southern California), 360 guests would be transported by passenger car. The remaining 388 guests would require 26 inbound trips on busses & vans (VOR =15), or 52 ADTs. **JT16**
5. Weekly staff are also assumed to carpool. Assuming a VOR of 2 is overly optimistic. Assuming 1.2 would be more reasonable, and would result in 40 ADTs. **JT17**
6. No provision is made for staff that resides on the premises. It must be assumed that they would have a significantly higher ADT rate than guests. The applicant should include these, along with a number of ADTs more typical of residences in the area. **JT18**
7. Assuming VOR of 1.2 for passenger vehicles and full utilization of parking spaces, and using LL&G's numbers for staff and deliveries, we get 692 ADTs, versus the estimate of 275 given by the LL&G analysis. This is a factor of 2.5 higher. **JT19**
8. Using linear extrapolation from the LL&G analysis, impact on the current traffic volumes can be estimated from Appendix E, Table 6: **JT20**

S of Dos Picos Park Rd:	Current: 1160	+Project: 1852	+60%
S of SR 67	Current: 3240	+Project: 3932	+20%

   The applicant should re-estimate these values using realistic VOR and full parking utilization.
9. Using linear extrapolation from the LL&G analysis, impact on northbound left turn onto 67 from Mussey Grade Road can be estimated from Appendix E, Table 4. These numbers are estimated by taking the increase in wait time calculated by **JT21**

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT15:

The VOR assumptions are based on actual operating conditions of the existing Salvation Army facility and the similar Oakbridge Camp as explained in DEIR response to comment JT13.

If the County approves the project, the MUP would include a condition requiring the applicant to assign an employee to maintain a daily vehicle log book to record the number of trips to and from the camp and retreat, all arrival/departure times and the type of vehicle (car, van, bus, etc.). The log book will be available upon request to DPLU. The purpose of this condition is to compare the actual project operations with the specific counts outlined in the Traffic Impact Assessment, which are based on the VOR assumptions.

Signs will be installed in the camp parking lots to inform camp users to register their vehicles at the camp office. Pursuant to Zoning Ordinance Section 7362.e, the Department of Planning and Land Use may, if necessary, conduct periodic inspections of the property for which a use permit is granted to ensure that the permitee is complying with the use permit conditions. The County acknowledges this responsibility to enforce the MUP conditions. Moreover, if the public believes that Salvation Army is not complying with one or more MUP conditions, the public may contact the Department of Planning and Land Use (DPLU). DPLU would refer the matter to the Code Enforcement section for investigation and enforcement.

Response to Comment JT16:

The number of parking spaces is not an accurate indication of trip generation. The proposed land-use is used to determine trip generation and parking demand. Some land uses have a very high turnover of very few spaces (high trip generation, low space-count), while others have a very-low turnover of very many spaces (low generation, high space-count). For the proposed project, the majority of drivers would be staff and or retreat guests who would not leave the site the same day they arrive. Most of them would stay for more than a day at a time. Actual data from the existing facility and a similar facility in close proximity to the site is a much better indicator of trip generation than parking spaces.

Response to Comment JT17:

Weekly staff VOR is based on past experience of the existing Oakbridge Camp. Based on the remote location of the facility, a VOR of 2.0 is appropriate because vehicle occupancy (carpooling) typically increases with distance.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT18:
The miscellaneous delivery line item in the trip generation table accounts for the small number of trips made by staff that resides on-site. Staff would not make trips similar to residences in the area, as the comment asserts. Most of staff's needs, such as meals, would be met on-site. Staffs would be expected to leave the camp daily for errands, pleasure trips, etc. Also, based on the operational characteristics of the camp, the TIA assumes that half of the staff arrive and depart weekly (see Final EIR, section 1.4.2). Therefore, staff would have a much lower trip generation rate than "typical residences in the area".

Response to Comment JT19:
The County does not concur with this comment. The trip generation approach described in the comment is incorrect. Please see DEIR response to comment JT16.

Response to Comment JT20:
The County does not concur with this comment. Appendix E does not include a Table 6. The trip generation methodology described in the comment is incorrect because it is based on parking spaces. The resulting trip generation calculations are therefore incorrect. Please see DEIR response to comment JT16.

Response to Comment JT21:
The County does not concur with this comment. The trip generation methodology described in the comments is incorrect because it is based on parking spaces. The resulting intersection calculations are therefore incorrect. Please also see response to comment JT16.

LL&G for 275 ADTs and multiplying by the scale factor of 2.5:

AM	Current: 28.2 sec	+Project: 39.2 sec	+39%	LOS:E
PM	Current: 35.2 sec	+Project: 70.0 sec	+100%	LOS:F

Note that the Level of Service is degraded by one unit from the LL&G analysis. The applicant should re-estimate these values using realistic VOR and full parking utilization. **JT21 (cont'd)**

10. The most effective mitigation for the model in which number of passenger vehicles tracks the number of available parking spaces at full occupancy is to reduce the number of designated and overflow parking spaces. The Salvation Army would then have to insure that adequate mass transportation was available in order to reach its permitted capacity. **JT22**

    If the Salvation Army were serious about its commitment to carpooling and mass transportation, it would not need to request excess parking. **JT23**

11. An alternative permit condition would be to require that the number of ADTs to and from the camp be kept below a specified level. This can easily be enforced by the permanent placement of traffic monitoring equipment at the camp entrances.
12. The Fourth Board Policy I-119 Review Screencheck issued to the Salvation Army by the SD County DPLU[4] states:

    "The TIA does not identify, discuss and assess the existing PM peak-hour traffic queues on SR 67. During the PM peak hour, traffic queues from near the Highland Valley/Dye Road/SR 67 intersection back to Archie Moore Road. The queue is highly visible and noticeable to the Ramona Community. The TIA should identify, discuss and evaluate existing SR 67 operations and the effects the proposed project will have on the existing SR 67 operations. The potential for the proposed project's traffic to add to the queue should be assessed. Mitigaton measures to avoid adding to the queue and/or reduce the queue should be evaluated and discussed." **JT24**

    In response, the SA added Table 8, which details present queue lengths. There is no discussion of these results. As to the effects of the effects of mitigation, it refers to its own Appendix I[5] (this consists of raw computer output and is not comprehensible to the reader), which does discuss effects on queue lengths and therefore does not comply with the screencheck. Table 8, the Intersection Queuing Summary, has not been rerun to estimate the effects of mitigation, and no discussion of the effect of mitigation on queue length has been added.
13. Mitigation through modifications along SR 67, as detailed in Appendix I and section 12 of the TIA should be recalculated using realistic VOR and vehicle numbers. **JT25**
14. The screencheck[6] also notes that:

    "the proposed project would distribute 212 average daily trips onto SR67 that is currently operating at LOS F. The 212 ADT exceeds the 100 ADT threshold identified in the County's draft guidelines for the determination of significant traffic impacts for a two-lane roadway operating at LOS F. It should be noted that the 212 ADT also exceeds the 200 ADT threshold identified for four-lane roadway operating at LOS F. A four-lane roadway has LOS D/E capacity between 30,000 and 33,400 ADT that is above what may be expected for a two-lane highway." **JT26**

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT22:

The County does not concur with this comment. The parking supply (197 designated spaces; 139 overflow spaces) is not needed for the vast majority of the year, since that amount is only required for special events, which will only occur four times per year. As indicated in the TIA (see Final EIR Appendix E), a maximum 748 guests could use the site for special events (615 under Reduced Project Alternative I).

Response to Comment JT23:

The County does not concur that permanent vehicle monitoring equipment would be necessary. The County proposes a different method to monitor vehicle traffic as part of the MUP. Please see DEIR response to comment JT15.

Response to Comment JT24:

The County's current significance criteria require that queues be analyzed only at failing unsignalized intersections. It does not require analysis of queues at signalized intersections. After the DEIR was circulated for public review, the traffic study was revised to include an assessment of the queues at the currently unsignalized SR 67/Archie Moore Road intersection and the SR 67/Mussey Grade Road intersection. The queues at the signalized Dye Road/SR 67 (Highland Valley Road/Dye Road/SR 67 as referenced in the comment) intersection were not analyzed because this is a signalized intersection. Therefore, the analysis does address queues per the County guidelines, and the conclusions are appropriate.

The second paragraph of the comment is no longer relevant because the County's traffic guidelines were revised after the DEIR was circulated for public review. Therefore, the queuing information that was in Table 3-5 of the DEIR ("Table 8" in the comment) is now in Table 3-6 of the Final EIR. This queue data was used to determine potential significant impacts at unsignalized intersections as explained above.

JT24 Footnotes:

4 and 5. Footnotes 4 and 5 indicate the source of information as provided in this comment. The County has considered this information in responding to comment JT24.

Response to Comment JT25:

The trip generation and analysis was performed correctly and adequately. The resulting impacts and mitigation measures are accurate. Please see DEIR responses to comments JT6, JT13, and JT15.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT26:

The Final EIR traffic analysis includes SR-67 (a State Highway) as a two-lane highway because SR-67 is a two-lane highway, not a "two-lane County road." The County's traffic guidelines were revised after the DEIR was circulated for public review. The revised guidelines allow a maximum project contribution to a failing two-lane highway segment of 225 ADT without the additional trips causing a direct significant impact. The project would contribute less than 225 ADT to SR 67 and therefore there would not be a significant direct traffic impact to this two-lane highway (see Final EIR, Table 3-4).

JT26 Footnotes:

6. Footnote 6 indicates the source of information as provided in this comment. The County has considered this information in responding to comment JT26.

The draft EIR does not note or emphasize either of these two points – not mentioning that the number of ADTs asserted by the SA (212) is far above the two-lane threshold for "significant impact" or mentioning it is even above the "significant impact" threshold for a four-lane highway. JT26 (cont'd)

15. As noted in Ken Gamble's review, the Mussey Grade Village facility is authorized to hold 33 permanent residences, but has expanded to approximately 100[7]. This surplus of 67 residences may be removed as the county enforces its code on this property. The County has provided no timetable for this reduction. Most of these were in place during the Traffic Data Services analysis,[8] resulting in an overestimate of future usage. Assuming 10 ADTs for these residents, there are an additional 670 ADTs from unpermitted residences, which may or may not go away depending on whether or not the County chooses to enforce its own occupancy codes. It should be noted that the traffic on Mussey Grade Road has noticeably increased – perhaps doubling - and become more treacherous since the current owner purchased the camp and began the purportedly illegal installation of units. JT27

This issue should not be used to argue that the impact of the SA traffic will be lessened because 1) the source of the additional ADTs should not legally be there 2) these additional ADT increase delays and traffic hazards and 3) it is by no means certain that they will be removed.

Joseph W. Mitchell, Ph. D.
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JT13 [1] Gamble, Ken; Salvation Army Camp and Retreat EIR Review; Transportation/Traffic Analysis; included with this submission

[2] Draft Environmental Impact Report, Salvation Army Divisional Camp and Retreat, SCH no. 2000031058, ER98-14-023, P70-379W2, February 2005, 9-16

JT14 [3] Draft Environmental Impact Report, Appendix E, Table 2.

[4] Letter from County of San Diego, Department of Planning and Land Use; Re: Salvation Army Divisional Camp and Retreat, SCH no. 2000031058, ER98-14-023, P70-379W2, FOURTH BOARD POLICY I-119 JT24 REVIEW SCREENCHECK COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (EIR); January 13, 2005, p. 6

[5] Draft Environmental Impact Report, Salvation Army Divisional Camp and Retreat, SCH no. 2000031058, ER98-14-023, P70-379W2, February 2005, TIA Appendix I, located within draft EIR Appendix E.

[6] Letter from County of San Diego, Department of Planning and Land Use; Re: Salvation Army Divisional JT26 Camp and Retreat, SCH no. 2000031058, ER98-14-023, P70-379W2, FOURTH BOARD POLICY I-119 REVIEW SCREENCHECK COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (EIR); January 13, 2005, p. 5

JT27 [7] Enclosed letters between Mr. Gamble and DPLU concerning the enforcement of county code on the issue of MG Village occupancy.

[8] Draft Environmental Impact Report, Appendix E, Table 1.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JT27:

The code enforcement activity referenced in the comment refers to the Mussey Grade Village Campground. The code enforcement violation pertaining to a non-conforming use has been resolved by the County and the owner of the campground. The occupancy of the facility is monitored pursuant to Section 6456(d)(3) of the Zoning Ordinance. The facility is required to maintain a log of the names of persons and dates of occupancy of campground spaces. The log must be made available to a code enforcement officer if a question arises as to compliance with occupancy limitations. Once the County reviews and accepts the facility's original log, staff will make subsequent site visits to ensure compliance with the occupancy requirements. Any violation of the occupancy limitations of this facility will be subject to the violation and penalty provisions of section 7703 of the Zoning Ordinance. The existing traffic counts taken for the traffic study for this project would have included traffic generated by the Mussey Grade Village when the counts were taken.

JT27 Footnotes:

7 and 8. Footnotes 7 and 8 indicate the source of information as provided in this comment. The County has considered this information in responding to comment JT27.

Attachments

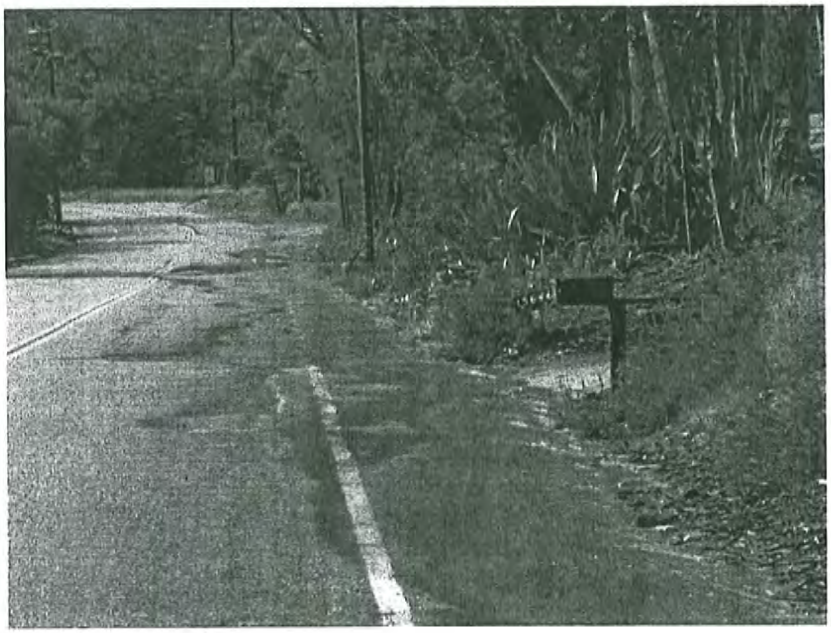
- Letter dated January 13, 2005, from DPLU to Salvation Army, regarding DEIR being inadequate pursuant to CEQA.
- Letter dated January 6, 2005, from DPLU to Ken Gamble (Mussey Grade Alliance), regarding status of rebuilding/grading and code enforcement at Mussey Grade Village Park.
- Letter dated December 13, 2004, from Ken Gamble (Mussey Grade Alliance) to DPLU, regarding rebuilding/grading and code enforcement at Mussey Grade Village Park.
- Letter dated April 28, 2004, from Ken Gamble to DPLU, regarding the Mussey Grade Village violation of limits set in Major Use Permit and road/pad grading without permits.
- Attachment to April 28, 2004 letter: Letter dated November 2, 1981, from DPLU to Samagatuma Resort, Inc., regarding limitations on non-conforming rights.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, TRAFFIC CHAPTER (JT SERIES) DATED MARCH 28, 2005 (CONTINUED)

Attachments (cont'd.)

- Attachment to April 28, 2004 letter: Letter dated July 10, 1990, from DPLU Code Enforcement to Samagatuma Resort, Inc., regarding requirement of Major Use Permit.
- Attachment to April 28, 2004 letter: Notice of Application for Samagatuma Resort, Inc.
- Attachment to April 28, 2004 letter: Letter dated April 20, 1995, from DPLU Code Enforcement to Realty and Mortgage Company, requesting withdrawal of application for Major Use Permit Modification.

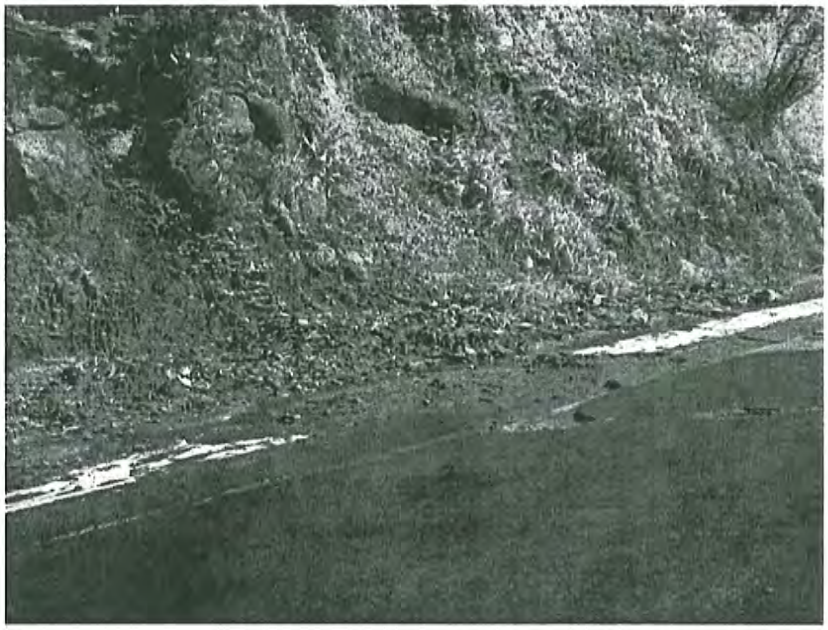
Mile Marker .5



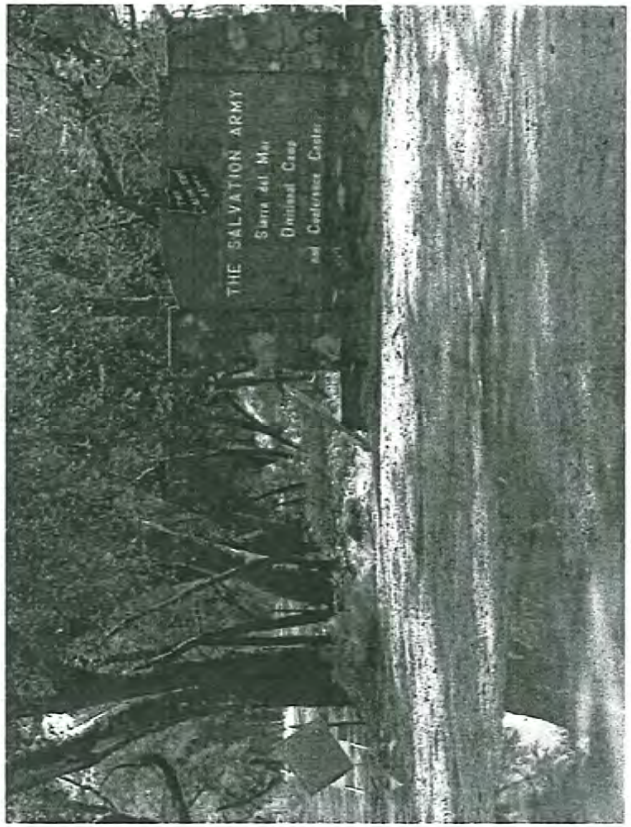
Note shoulder

Shoulder

Northbound Shoulder on Blind Corner



Southbound lane Mile Marker 1.8



JT
Attachment

GARY L. PRYOR
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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January 13, 2005

The Salvation Army
Captain Edward Loomis
2320 Fifth Avenue
San Diego, CA 92101

RE: SALVATION ARMY DIVISIONAL CAMP AND RETREAT; MUP 70-379W[2]; ER 98-14-023; SCH# 2000031058; FOURTH BOARD POLICY I-119 REVIEW SCREENCHECK COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

Dear Sir:

The Department of Planning and Land Use (DPLU) has completed the review of your screencheck draft EIR and determined it not to be adequate pursuant to the California Environmental Quality Act (CEQA) and the County's "Environmental Impact Report Format and General Content Requirements". At this time, additional information or revisions are required to make the document adequate and ready for public review. The reasons for this determination and the revisions/information required are as follows:

REVISIONS AND ADDITIONAL INFORMATION: Pursuant to Board of Supervisors Policy I-119, County staff has reviewed the Draft EIR, dated December 2004, for compliance with the California Environmental Quality Act (CEQA) and the state CEQA Guidelines.[1] We have the following comments on the Draft EIR:

SUMMARY

1. Pages S-15 and S-16, MM 3.1.10a and 3.3.10b: Please change these mitigation measures to make them consistent with the changes to the mitigation measures for cumulative traffic impacts. See comments under Cumulative Impacts below.

[1] CEQA is found in Public Resources Code section 21000 and following, and the CEQA Guidelines are found in California Code of Regulations, title 14, section 15000 and following.

JT
Attachment

BIOLOGICAL RESOURCES

2. Page 2.2-9, second full paragraph: In the sixth sentence, why is the lack of connectivity addressed only to the east? What is the status of the connectivity to the north, south and west?

CUMULATIVE IMPACTS

3. Page 3-8:

   a. The carryover paragraph at the top of the page and Impact 3.3.10.a are confusing. It appears that the project's contribution to the cumulative traffic impact on SR-67 is small (reduction of 0.2 mph), but that the cumulative traffic impact is significant. Assuming these conclusions are correct, this section should be rewritten to explain the conclusions clearly.

   b. Last paragraph, MM 3.1.10a: First, describe the road improvements that are necessary to mitigate the project's contribution to the cumulative traffic impact.

      Second, explain that the County is considering a Transportation Impact Fee (TIF) program. The TIF program includes two components, the financing mechanism (the fee) and an approval of and a commitment to construct certain road improvements.

      Third, explain that if the County adopts both components of the TIF program and the TIF program includes the road improvements necessary to mitigate the project's contribution to the cumulative impact and those road improvements will be constructed before the project is completed, payment of the TIF for this project will mitigate the project's contribution to the cumulative traffic impact.

      Fourth, explain that if one or more of the factors in the previous paragraph do not occur, the mitigation will be the construction of the road improvements described above.

4. Page 3-9:

   a. First paragraph: The explanation for how the mitigation measure would eliminate the project's contribution to the cumulative impact appears to be that the mitigation measure would "reduce the attractiveness of Archie Moore Road and Highland Valley Road as a

peak hour bypass to SR-67." Reducing "the attractiveness" of the road as a bypass is a very thin basis for concluding that a mitigation measure would be effective. We recommend including a better explanation for why this mitigation measure would be effective.

b. Second paragraph: See Comment 3b above.

c. Third paragraph: It is not clear how widening the shoulder of SR-67 would provide any mitigation. Please explain.

d. Fourth paragraph: It is not clear what "de-facto widening of northbound SR-67" means. Will the road be widened or not? Please explain.

e. Fifth paragraph: See Comment 3b above.

5. Page 3-10:

a. First paragraph: Please clarify how these road improvements would reduce the traffic delay at this intersection during peak hours.

b. Last paragraph: Please revise this paragraph to read as follows: "In summary, if the County adopts both components of the TIF, the TIF includes the road improvements described above and those improvements will be constructed before the project is completed, payment of the TIF for this project would mitigate the project's contribution to the cumulative traffic impact. If any of these factors do not occur, the mitigation would be to construct the road improvements described above."

EFFECTS FOUND NOT TO BE SIGNIFICANT

6. Page 6-14: It appears that the discussion for why the project would not cause significant impacts to SR-67 was omitted (project traffic would reduce speeds on SR-67 by only 0.2 mph, and drivers would not notice this reduction in speed). This discussion should be added.

If you have any specific questions regarding these EIR comments, please contact Glenn Russell, Environmental Coordinator at (858) 694-2981 or e-mail at glenn.russell@sdcounty.ca.gov.

DEPARTMENT OF PUBLIC WORKS

Transportation Planning/Route Locations staff has reviewed the following documents regarding the proposed Salvation Army Divisional Camp and Retreat:

- Draft Environmental Impact Report (DEIR) prepared by BRG Consulting, Inc dated December 2004.
- Traffic Impact Analysis (TIA) prepared by Linscott, Law, and Greenspan Engineers dated December 13, 2004.

Traffic Impact Analysis (TIA)

1. The TIA's estimates of changes in speed on SR 67 due to project traffic are inadequate to fully assess potentially direct impacts to SR67.

   a. On page 18 of the TIA, it is noted the two-lane highway analysis method contained in the Highway Capacity Manual (HCM) is presented in terms of speed (miles per hour). The HCM analysis for two lane highways is based upon average speed and the percent time following.

   b. The TIA Table 7 notes that SR-67 is operating at LOS F. Section 20-22 on the HCM notes that "In LOS F percent time following is nearly 100 percent and speeds are highly variable and difficult to estimate". Utilization of speed as a measure of effectiveness for determining significance of traffic impacts for two-lane highways operating at level of service F may not be appropriate based upon the inability to accurately estimate travel speeds for LOS F conditions.

   c. In appendix F of the traffic study, the calculation sheets for the two-lane highway analysis do not specify the lane and shoulder widths. No adjustments have been made in the calculations for lane and shoulder widths that differ from the base conditions identified on page 12-13 of the HCM.

   d. The computer software used to perform the two-lane highway analysis should be specified and the assumptions/inputs into the calculations specified and verified.

2. Per figure 7 of the TIA, the proposed project would distribute 212 average daily trips onto SR67 that is currently operating at LOS F. The 212 ADT exceeds the 100 ADT threshold identified in the County's draft guidelines for the determination of significant traffic impacts for a two-lane roadway operating at LOS F. It should be noted that the 212 ADT also exceeds the 200 ADT threshold identified for four- lane roadway operating at LOS F. A

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Attachment

four-lane roadway has a LOS D/E capacity between 30,000 and 33,400 ADT that is above what may be expected for a two-lane highway.

3. The TIA does not identify, discuss or assess the existing PM peak-hour traffic queues on SR67. During the PM peak hour, traffic queues from near the Highland Valley Road/Dye Road/SR67 intersection back to Archie Moore Road. The queue is highly visible and noticeable to the Ramona Community. The TIA should identify, discuss and evaluate the existing SR67 operations and the effects the proposed project will have on the existing SR67 operations. The potential for the proposed project's traffic to add to the queue should be assessed. Mitigation measures to avoid adding to the queue and/or reduce the queue should be evaluated and discussed.

4. The DEIR should be revised to reflect any changes made to the traffic study in response to the above comments.

If you have any questions concerning the Traffic comments, please call Bob Goralka at (858) 874-4202.

SUBMITTAL REQUIREMENTS: Unless other agreements have been made with County staff, you must comply with the following submittal requirements in order to make adequate progress and to minimize the time and costs in the processing of your application:

1. Submit a copy of this letter.

2. Submit a separate letter that indicates specifically where and how each of the above comments is addressed in the revised EIR/information/documents. For simple comments it is acceptable to merely reference the document, page and paragraph number were the strikeout/underline revisions have been made. Otherwise, the rationale for the revisions (or lack of revisions) must be given.

3. Submit the following information and/or document(s) with the requested number of copies as specified. **The Project Number and/or Environmental Log Number must be clearly and visibly labeled on all submitted documents. All changes to the document(s) must be in strikeout/underline format.**

INFORMATION/DOCUMENT	NO. OF COPIES	LEAD REVIEW/SECTION OR DEPT
Revised Screencheck Draft EIR	2	Resource (2)
Sections 3.1 & Sections 6.2 of EIR	3	Resource (1)/DPW (2)
Traffic Impact Analysis/Appendix F	5	Resource (3)/DPW (2)

JT
Attachment

To assure timely and cost-effective processing of your project, all items must be submitted concurrently and delivered to the DPLU Zoning Counter at 5201 Ruffin Road, Suite B, San Diego, California 92123-1666.

RESUBMITTAL DUE DATE: In order to maintain adequate progress in processing of your project, the DPLU requires that all of the revisions/information to the screencheck draft EIR requested in this letter be submitted in conformance with the above submittal requirements by **January 22, 2005**. Please note that an extension of this date may be granted at the discretion of the Director of the DPLU. To request an extension, submit a written request, signed and dated by the project applicant. The request must include the proposed new submittal date and a brief reasoning for the extension request. If the revised screencheck draft EIR is not received, or an approved extension request is not granted by the Director by the above date, the Department may make a recommendation for denial of your project to the appropriate decision-making authority based upon inadequate progress pursuant to CEQA Guidelines Section 15109.

If you have any questions regarding this request, please contact me at (858) 694-3690 or by e-mail at joseph.farace@sdcounty.ca.gov.

Sincerely,

JOSEPH FARACE, Project Manager
Regulatory Planning

JF:gr: kb

cc: Kiersten Giugno, Senior Project Manager, BRG Consulting, Inc., 304 Ivy Street, San Diego, CA 92101
Matt Peterson, Peterson and Price, 530 "B" Street, Suite 17000, San Diego, CA 92101
Mike Matalon, AIA Matalon Architecture & Planning, 910 Grand Avenue, San Diego, CA 92109
John Boarman, Linscott, Law & Greenspan, Engineers, 4542 Ruffner Street, Suite 100, San Diego, CA 92111
Glenn Russell, Environmental Coordinator, Department of Public Planning and Land Use, M.S. O650
Kristin Blackson, Policy I-119 Assistant, Department of Public Planning and Land Use, M.S. O650
John M. Leach, President, Leastar Corp., 13150 Carousel Lane, Del Mar, CA 92104
Mark Mead, County Counsel, M.S. A12

JT
Attachment

GARY L. PRYOR
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE
5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
338 VIA VERA CRUZ • SUITE 201
SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. • SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

January 6, 2005

Ken Gamble
19510 Laurel Lane
Ramona, CA 92065

RE: Mussey Grade Village

Dear Mr. Gamble:

The Department of Planning and Land Use (DPLU) is in receipt of your letter dated December 28, 2004 where you inquired as to the status of the rebuilding/grading effort and code enforcement actions currently ongoing at the Mussey Grade Village Park.

Regarding the new construction, the property owner has replaced ten of the 19 mobile homes that were lost in the fire. Pursuant to County files and documents provided by the property owner, the 19 mobile homes in question are located in that area of the park where mobile home spaces are authorized under the November 1981 letter. The grading permit application for the park is currently being processed through the Department of Public Works. If you have any questions regarding the issuance of building permits n this project, please contact Jeff Murphy at (858) 694-3730.

Regarding the status of the code enforcement action, you were advised in a phone call from Pam Elias that the County would be meeting with Mr. Grice to discuss the occupancy of the travel trailers and establish a plan form compliance. That meeting has taken place and Mr. Grice has already notified some of his tenants of the need to move. This process will be slow in order to minimize negative impacts from the displacement. You were advised of this and at the time expressed understanding and sympathy for those who were to be displaced.

JT
Attachment

As stated previously, the Department will not discuss the details of active code enforcement cases with individuals that are not a direct party to the case therefore you will not be provided with a detailed timetable for the reduction of units.

Sincerely,

JEFF MURPHY, Chief
Building Division
Department of Planning and Land Use

PAM ELIAS, Chief
Codes Division
Department of Planning and Land Use

cc: Ken Brazell, DPW Project Manager, MS O336
David Hulse, DPLU Chief Major Projects, MS O650
Robert Horne, Code Enforcement Officer II

Ken Gamble
19510 Laurel Lane
Ramona, CA 92065
December 13, 2004

Jeff Murphy, Chief, Building Division
Department of Land and Planning

Dear Jeff,

Thank you for taking the time to respond to my concerns about Mussey Grade Village last May. In that email, you mentioned that you would keep me apprised of any additional activity on this project and I am now writing to you because I have not heard any new information. This concerns me, as it seems unlikely that nothing has happened. I understand that the owner is required to obtain an "L" grade (major grading) permit and that this process may take up to 24 months.

In the meantime, the use of recreational vehicle sites in the village for periods exceeding the 90-day limit continues to plague Mussey Grade Rd. residents. I have been asked by Mussey Grade Road Alliance to keep them informed on the progress of the county. Yet, after all of the phone calls made over the last year, the only response I've had was in July from Pam Elias. She merely informed me that it was against department policy to meet and discuss an active enforcement case with concerned citizens or neighbors. If it is indeed against department policy to meet with impacted neighbors, please send a letter updating me on the progress that has been made in bringing them into compliance. Specifically, please send a timetable of the county's plan to bring the number of year-round units down from the current number of over 100 units into compliance of 33.

Our concerns about the village's non-compliance have escalated over the past few months because of damage done to MG Road from MG Village north to 67. The severity of potholes and cracked road right at the entrance to MG Village heading north clearly points to an overburdened road with cars from this non-permitted, illegal development. I'm sure some of this damage was also sustained during the transport of oversized modular homes into the park. We are also concerned about the safety of drivers, bikers, horseback riders, joggers and pedestrians on this narrow, overused road. Our own son

JT
Attachment

has just received his license and we are apprehensive because so many cars on this road increases the risk of someone hitting him. I have made it clear in my conversations with code enforcement that the county may be implicated if a serious accident or fatality occurs on this road. This is especially true in light of the lack of any aggressive enforcement by the county after so many requests for compliance have been made and documented. (i.e. 100+ full time residents vs. the 33 allowed)

In your email of May 21st, you stated in #2 that "in an effort to get renters out of their tents and back into their homes, the Dept. of Public Works has agreed to release ungraded lots", however, on the very same day that I received this letter, realtor signs were placed in front of each of the nine new, manufactured homes. This action made it clear to all of us that the owner was acting with "for profit" motives and not to provide help for fire victims.

We appreciate your understanding our concern and our desire to be informed and thank you for your time. Please send me a letter confirming receipt of this letter, detailing the progress accomplished and a timetable for the reduction in units at MG Village.

Sincerely,

Kenneth Gamble
On behalf of Mussey Grade Alliance

Cc:
David Hulse, Planning
Kenneth Brazell, Grading DPW
Pam Elias, Code Enforcement Chief
Martin Ortega, Environmental Health Specialist, DEH
Mussey Grade Road Alliance

JT Attachment

9 UNITS
SELL THESE & BRING MORE IN.
No picture available.
WILL SELL FOR HIGH END
5/27/04 OWNER WANTS HIGH END.
SPOKE W/ REALTOR

Mobile Home Status: **Active** LP: **$ 99,900 - $139,900** REF #: **1**
MLS #: **042028282** MT: **0** OLP: **$ 139,900**
Photo: **0**
Mth Rent: **515**
Listing Type: **Exclusive Right (R)**
Address: **14525 30 Mussey Grade Road** Space #: **30**
City: **Ramona** ST: Zip: **92065-** Comm: **RAMONA**
Cross Street: **Laurel Lane** Park Name: **Mussey Grade Village Park**
Map: **1192B2** List Date: **5/20/2004**
Directions To Property: **FROM S.D. HWY 67 TOWARD RAMONA R MUSSEY GRADE RD L LAUREL LN.**

NO PERMIT AS OF JUNE 1, 2004

General Information

Bedrooms: **3**	Length: **56**	Lot Size: **Up to & Inc .25 Acres**	Serial #:
Optional BR: **0**	Width: **23**	Lot Dim:	License #:
Baths: **2**	Make: **Cavco**	Zoning: **SM-25**	School District: **Ramona**
Est SqFt: **1330**	Model: **CL5224B**	Axles: **No**	Ownership: **Fee Simple**
Source of SqFt: **Builders Brochure**	Stories: **1 Story**	Tax Rolls: **Yes**	
APN: **327-010-06-00**	Spaces in Park: **101**	Real Estate Inc: **No**	Age Restrictions: **N/K**
Year Built: **2004**	Water District: **RMW**	On Foundation: **No**	Topography: **Rolling**

Remarks

KITCHEN WITH UPGRADED APPLIANCES, CEILING FANS IN MASTER BEDROOM AND LIVINGROOM, FIREPLACE IN LIVINGROOM, POT SHELVS. MANY AMENITIES IN PARK FOR ACTIVE LIFESTYLE. PARK HAS ROLLING TERRAIN WITH HOMES POSITIONED FOR PRIVACY AMONG THE TREES AND BOULDERS.
Confidential Remarks: CLOSE OF ESCROW DATE IS CONTINGENT ON PARK & S.D. COUNTY APPROVAL

Rooms Information

Living Room: **23x12**	Dining Room: **12x11**	Family Room: **0**	Kitchen: **11x7**	Extra Room: **0**
Master Bed: **13x13**	Bedroom 2: **10x9**	Bedroom 3: **10x9**	Bedroom 4: **0**	Bedroom 5: **0**

Additional Information

Add Land Use: **N/K**	Guest House: **N/K**	Pets: **Yes**	Skirting: **Wood Products**
Boat Facilities: **N/K**	Water: **Meter on Property**	Parking: **2+ Spaces**	Spa: **N/K**
Cooling: **N/K**	Heat: **Forced Air, Propane**	Pool: **Community**	Searchable Room: **Bedroom(s) Entry Level, MBR Entry Level**
Exterior: **Wood**	Interior: **Drywall**	Possession: **Call Listing Agent**	Sewer: **Septic In**
Fencing: **N/K**	Irrigation: **N/K**	Patio: **N/K**	Telecom: **N/K**
Floors: **Wood**	Laundry: **Common Facility, Laundry Room**	Roof: **Composition**	Topography: **Rolling**
Fireplace: **FP In Living Room**	Occupied: **Vacant**	Security: **N/K**	View: **Greenbelt, Mountains/Hills**
Frontage: **N/K**	Ownership: **Fee Simple**	Site: **Irregular Lot, Private Street, Street Paved**	

Complex Features: **Clubhouse/Rec Room, Laundry Facilities, Pool, Recreation Area, RV Parking, Tennis Courts**
Equipment: **Dishwasher, Disposal, Fire Sprinklers, Range/Oven, Refrigerator**

Financing

Terms: **Cash**		Assessments: **N/K**	
Total Loan Bal: **$**	Mello-Roos: **$0/N/K**	Other Fee: **$0/N/K**	Type of OF: **N/K**
1st Trust Deed:	1st Interest:	2nd Trust Deed:	2nd Interest:
1st Loan Type: **N/K**	1st Assumable:	2nd Loan type: **N/K**	2nd Assumable:
H.O. Fee: **0/N/K**			
HOF Includes: **N/K**			

Office and Showing Instructions

Occupant: **VACANT**	Occupant Phone: **619-561-2101**	Show Instruct: **Lock Box**	Lock Box: **Yes**
List Agent: **Paul E Runge**	Agent Phone: **(619) 938-9417**	Adt'l Phone #: **(619) 990-7285**	2nd Agent: **Dave Keller**
List Office: **Paul Runge & Assoc, RLTRS LLC**	Office Phone: **(619) 561-2101**	Broker #: **23048**	CBB: **3%**
Email: **perxnl17@aol.com**	Fax: **(619) 561-2102**	Pager: **(619) 990-7285**	CVR: **Yes**

Sold Information

Off Market Date:	Close of Escrow:	Expire Date: **11/15/2004**	Sold Price: **$**
Sale Agent #:	Sale Agent Name:	SA Phone:	Financing:
Sale Office #:	Sale Office Name:	SO Phone:	

Prepared by: Paul E Runge

Information is believed to be reliable, but not guaranteed.
Copyright 2001-2003 SANDICOR, Inc.

Fri, May 21, 2004 03:34 AM

JT Attachment

Ken Gamble
19510 Laurel Lane
Ramona, CA 92065
April 28, 2004

Mr. Gary Pryor, Director DPLU
5201 Ruffin Road
San Diego, CA 92123

Re: Mussey Grade Village, APN # 327-010-06

Dear Mr. Pryor:

I am writing to you regarding the changes occurring at MG Village that are in violation of the limits set by its "Non-Conforming Use" status and request that the DPLU, DPW and DEH immediately ascertain whether the property is in compliance. Below is summarized what is found in the MG Village files with DPLU. Attached are copies from the file for your reference.

- DPLU personnel state that MG Village holds a Major Use Permit (MUP P94-020W), however, the previous owner withdrew his application to modify the "non-conforming use" status in 1995 and no new application has since been made. (See attached)
- DPLU computer shows three pages of active building permits for MG Village, yet they are without any approval stamps from the Ramona Fire Department. The Ramona Fire Marshall was unaware of any ongoing construction in MG Village and became alarmed when made known of this activity within an area he has the responsibility for fire protection.
- The number of mobile homes allowed in the park is 33 (See attached). I have counted 45 mobile/modular homes presently in the park. There is also a question of whether or not the new modular homes, placed since the Cedar Fire, meet size requirements set by the DPLU.
- The DPLU file states that the 78 recreational vehicle/trailer sites only be occupied 90 days in a 12 month period. These transient habitation sites appear to be used on a continuous year round basis.
- Extensive road and pad grading has taken place recently without permits. This has been done in sensitive habitat areas and caused great distress to neighbors.

Please investigate this matter and copy me, via email, on all correspondence regarding this property and any changes made to their "Non-Conforming Use" status. I am copying this letter to the people listed below and ask that they cooperate in the investigation of this matter.

Sincerely,

K. Gamble

Ken Gamble
ken@quatrocomposites.com

cc:
Mr. John Synder, Director of Public Works
Ms. Pam Elias, Code Enforcement Chief
Mr. Martin Ortega, Environmental Health Specialist, DEH
Ms. Rose Blake, Director of Zoning
Ms. Lynn Walker, Code Enforcement
Mr. Bob Horne, Code Enforcement
Mr. Ralph Steinhoff, Fire Services Coordinator, DPLU
Mr. Steve Delgadillo, Ramona Fire Marshall
Mussey Grade Road Alliance

COUNTY OF SAN DIEGO
Department of Planning & Land Use

JT
Attachment

Please reply to:

5201 Ruffin Road
San Diego, CA 92123

200 E. Main St.
El Cajon, CA 92020
(714) 579-4511

334 Via Vera Cruz
San Marcos, CA 92069
(714) 741-4236

[ ] Paul C. Zucker, Director
Suite B1
(714) 565-3000

[ ] Codes Enforcement
Suite G3
(714) 565-5669

[ ] Development Regulation
Suite G4
(714) 565-5962

[ ] Planning
Suite B5
(714) 565-3002

[ ] Zoning Administration
Suite B6
(714) 565-5977

Tom Hamilton
First District

Paul W. Fanlam
Second District

Roger Hedgecock
Third District

Jim Bates
Fourth District

Paul Eckert
Fifth District

November 2, 1981

327-010-06
APN 327 0100 600
14625 MG. ROAD
96.3 ACRES.
ZONED RURAL RESIDENTIAL

327.021-01

Mr. Bill Johns
Samagatuma Resort, Inc.
Route #1, Box 495
Ramona, CA 92065

Dear Mr. Johns:

This is in regard to your plans to renovate the facilities at Samagatuma Nudist Resort. We appreciate your efforts to better organize and manage the facility, and to upgrade the electrical and septic systems. As we have discussed previously, our desire is to clarify the legal non-conforming status of the resort and to allow you to improve it in compliance with County Zoning Ordinance requirements for non-conforming uses.

We have received a detailed plot plan from you which shows 33 mobilehome spaces, 78 RV or travel trailer spaces and 8 houses. We have walked the site with you and concur that there is an historic use of the property as a transient and semi-permanent nudist resort. Your plot plan adequately details this historic use and, therefore, represents your legal non-conforming rights. As we have discussed, we are prepared to accept this plot plan and authorize siting of new mobilehomes in accordance with it, provided certain health and safety improvements are made.

Please be advised that we are considering this property to be a legal non-conforming "Transient Habitation: Resort" Use Type, which has included semi-permanent occupancy of mobilehomes, trailers and cabins. It is not, however, a legal non-conforming mobilehome park and we will not allow it to be developed as such. Therefore, the limitations on your non-conforming rights are as follows:

1. Mobilehome Spaces - 33 mobilehome spaces are authorized. These may be new double-wide coaches and may be permanently occupied. However, the timing for their installation must be in accordance with the timetable described below.

JT
Attachment

2. Trailer Spaces - 48 trailer spaces are authorized. These spaces may contain trailers or campers left on the site by their owners, but may not be occupied by the same person or group of persons more than a total of 90 days in any 12 month period. This is in accordance with Section 6402e of the Zoning Ordinance. These spaces may not contain any trailer coaches greater than 8 feet in width or 40 feet in length, and may not be hooked-up to utilities in a permanent manner.

3. Recreational Vehicle Spaces - 30 spaces authorized for use by campers, motorhomes or tents on a transient basis. These spaces may not be used to store camping vehicles on the property and are subject to the 90 day occupancy limit.

4. Houses - 8 houses exist on the property; however, only houses 1 - 6 as shown on the plot plan may be occupied as permanent dwelling units. Houses #7 and #8 may only be used as transient cabins or for recreational activities, and are subject to the 90 day occupancy limit.

Needed Public Safety Improvements:

1. Electrical Service - As you know, the electrical service to the mobilehome and trailer sites is very substandard. We strongly advise that you not use any electrical connections unless the entire circuit has been analyzed by a licensed electrician and determined to be safe. Because of the deteriorated condition of the electrical service, we cannot allow any further mobilehome sitings until substantial progress is made toward upgrading the service.

2. Fire Protection - A comprehensive fire safety plan is needed. This may involve an on-site water storage tank. Please contact the Ramona Fire Marshall to begin discussion on this issue.

3. Mobilehome Space #14 - A siting permit is required for this installation, which has been underway. As we told you earlier, the coach is too high off the ground. Either engineered foundation plans must be provided or the coach lowered to a more conventional height.

Timing of Improvements:

Prior to any further mobilehome sitings, the following must be done:

1. Provide an electrical service layout showing the location of all services, identifying which spaces and type of electrial equipment are served by each, and giving load calculations.

2. Eliminate live service to all electrical boxes which are not to be used.

All work upgrading the electrical service must be authorized by a valid electrical permit issued by this Department (except work to remove service to hazardous or abandoned equipment).

Resort, Inc.

4. Water Supply - All sites must have backflow prevention devices at each water supply source.

4. Begin discussion with the Ramona Fire Marshall on a Fire Safety Plan.

5. Obtain a mobilehome park permit from the County Health Department.

Once these actions have been completed, we will authorize the issuance of a maximum of 5 new mobilehome sitings (Space #14 must be one of these 5). As each siting is done, the electrical service must be upgraded all the way back to the San Diego Gas & Electric drop. Also, as discussed previously, all new coach installations must be connected to the septic system with approved sewer pipe; not the flexible pipe which you had on-site at one of our visits.

Prior to issuance of more than 5 siting permits, you must provide a letter from the Ramona Fire Marshall stating that you have reached an agreement guaranteeing implementation of a Fire Safety Plan. Thereafter, as additional mobilehomes are sited, upgrading of electrical services to each must continue. Also, significant progress must continually be made toward upgrading of all electric services within the entire park and installing required backflow prevention devices in every space. We reserve the right to refuse to issue siting permits if progress on upgrading the electrical service and installation of backflow prevention devices is not being made.

In conclusion, our recognition of certain legal non-conforming rights which Samagatuma has established by its historic use of the property does not remove our responsibility to insure minimum standards of public health and safety. We believe this memorandum establishes a procedure which will guarantee such minimum standards. If you agree to proceed with the park improvements in compliance with this memorandum, please acknowledge your agreement in writing. If, however, you feel that our decision is in error, you may appeal to the Planning Comission pursuant to Section 7200 of the County Zoning Ordinance. This appeal must be in the form of a letter setting forth the grounds upon which you assert there has been an error or abuse of discretion. The appeal must be received within 10 days of the date of this letter and be accompanied by a filing fee of $300.

Should you have any questions, please do not hesitate to contact us. Our office is being relocated to 5201 Ruffin Road in Kearny Mesa during the week of November 9th. Our phone number there will be 565-5920.

Very truly yours,

DEPARTMENT OF PLANNING AND LAND USE

Vincent P. Quasarano, Chief
Land Use Regulation (El Cajon)

VPQ:JBM:gh

cc: Department of Public Health

LAUREN M. WASSERMAN
DIRECTOR
(619) 694-2962

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

FIELD OFFICE
334 VIA VERA CRUZ
SAN MARCOS
CALIFORNIA 92069-2636
(619) 741-4306

MAIN OFFICE
5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (619) 694-2960

July 10, 1990

Mr. Robert Dukes
The Mason Gordon Company
1335 Hotel Circle South, Suite 101
San Diego, Ca. 92108

Re: Samagatuma Resort

Dear Mr. Dukes,

On November 2, 1981, the Department of Planning and Land Use determined that the property located at 14625 Mussey Grade Road, Ramona was a legal nonconforming "Transient Habitation: Resort" use type. It included semi-permanent occupancy of mobilehomes, trailers and cabins. The property was also subject to the following limitations and were described in a plot plan dated September 10, 1981: 33 mobilehome spaces, 48 trailers spaces, 30 recreational vehicle spaces and 8 existing houses. Enclosed is a copy of a letter sent to Bill Johns of Samagatuma Resort from Vincent Quasarano, Land Use Regulation Chief.

On June 27, 1985, the use type was changed from Transient Habitation: Resort to Transient Habitation: Campground. Enclosed is a copy of a letter sent to Ed Smith, Attorney for Samagatuma Resort from Randall Hurlburt, Deputy Director of Codes Enforcement, advising of that change. No other use type changes have been made to the property as of this date.

On May 25, 1990, an on site inspection of the property was conducted by Kerry McNeill from the Health Department and Larry Muir from Code Enforcement. We observed several changes to the 1981 plot plan, however, the total number of spaces allowed in the nonconforming status was not exceeded. During the inspection we observed 29 mobilehomes, 5 recreational vehicles and 7 trailers. Most of the locations did not correspond to the 1981 plot plan. Of the original 8 houses shown on the plot plan, only 2 remain. The club house and restaurant have been converted to a single family dwelling per Les Brock, your property manager. Mr. Brock refused to allow us entry for an inspection of the structure. He stated that it had been converted about a year ago and that he was not going to let us invade the privacy of his home.

JUL 1990
RECEIVED

JT
Attachment

In order to determine if your nonconforming status is still valid of if a major use permit will be required, the following items must be addressed:

1. A new plot plan must be submitted showing the location of all mobilehome spaces, trailer spaces, recreational vehicle spaces and the remaining houses. You may not exceed the number of allowed spaces as described in the letter dated November 2, 1981 to Bill Johns.

2. The club house and restaurant must be returned to their original state if they are to be considered part of the nonconforming use. A change in use could invalidate the nonconforming status.

3. All mobilehomes not in their original spaces as described on the 1981 plot plan, will be required to have a building permit for siting. As of this date, there are no building permits on file in this office for your property.

4. You must comply with all the requirements of the Uniform Building Code, the Uniform Plumbing Code and the National Electric Code.

5. You must comply with all the requirements of the Department of Health Services.

6. You must comply with all the requirements of the Ramona Fire District.

By October 15, 1990, please submit the proper documentation showing that you have complied with the above requirements. If you fail to comply, a citation may be issued which would require your appearance in the El Cajon Municipal Court.

If you have any questions, please call me at 694-3741.

Sincerely,

Larry Muir

Larry Muir
Code Enforcement Supervisor

cc: Kerry McNeill, Department of Health Services
Mike Neill, Ramona Fire Department

JT
Attachment

NOTICE OF APPLICATION OF PROPOSED LAND USE PROJECT

NOTICE IS HEREBY GIVEN that the Department of Planning and Land Use has received an application for a discretionary land use permit in your community. This application is available for public review at 5201 Ruffin Road, Suite B, San Diego, CA 92123, during normal business hours. Or, you may call Dave Lassaline, at 694-3806, for more information. The following is a brief description of the project, followed by a brief description of the planning process.

PROJECT DESCRIPTION (also see attached "Project Summary" and Vicinity Map):

Proposed Major Use Permit (P94-020W[1]) for the purpose of modifying a non-conforming use, an existing mobilehome and recreation vehicle park known as Samagatuma/M.G. Park. The purpose of the modification is to relocate 30 mobilehome spaces to allow correction of a previously malfunctioning sewage disposal system.

The purpose of this notice is to give property owners and other interested parties in the vicinity of the proposed development an opportunity to be informed of the proposal prior to action by the County.

There are several ways in which you may gain more information, or voice an opinion regarding the proposal. First, you may attend the local planning group meeting at which this project will be discussed. Please see information attached for the name of your Planning Group, and the date and time of their meetings.

Second, you may write to the Project Manager, at the address noted above. Your comments will become part of the public record, and will be taken into account whenever a decision is made regarding this project. Comments sent in the first 21 days after project application will be most helpful to staff, due to the fact that staff will make a formal determination as to the completeness of the application, as required by the California Environmental Quality Act, within 30 days. Your comments will help identify issues that are directly related to the unique situation of your community.

Third, you may attend as an observer at the Project Action Committee meeting. This is an informal meeting of the applicant, staff and the planning group, held within the first 30 days after project application. Project Action Committee meetings are not held for all case types, and public testimony is not accepted at these meetings.

Finally, you may attend and present testimony at a public hearing. If you received this document in the mail, then you will receive a notice of the time and place of any public hearing. The notice of public hearing will be sent at least 10 days prior to the public hearing. If you did not receive this notice in the mail, you may request to have your name placed on the mailing list for the public hearing notice.

PAC\09-94\P94020.NOT-jb

JT
Attachment

County of San Diego

ROBERT R. COPPER
DIRECTOR (Acting)
(619) 694-2962

DEPARTMENT OF PLANNING AND LAND USE
5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (619) 694-2960

April 20, 1995

Realty and Mortgage Company
8220 University Avenue, Suite B
La Mesa, California 91941

Attention: Mr. Weldon W. Griffin

M. G. VILLAGE, P94-020W[1]

Dear Mr. Griffin:

This letter is in regards to your correspondence of March 23, 1995 requesting a withdrawal of your application for a Major Use Permit Modification to an existing mobilehome and recreation vehicle park, M. G. Village, located in the Ramona area.

Your request for withdrawal is hereby accepted and processing is terminated.

If you have any questions, please contact Dave Lassaline at (619) 694-3806.

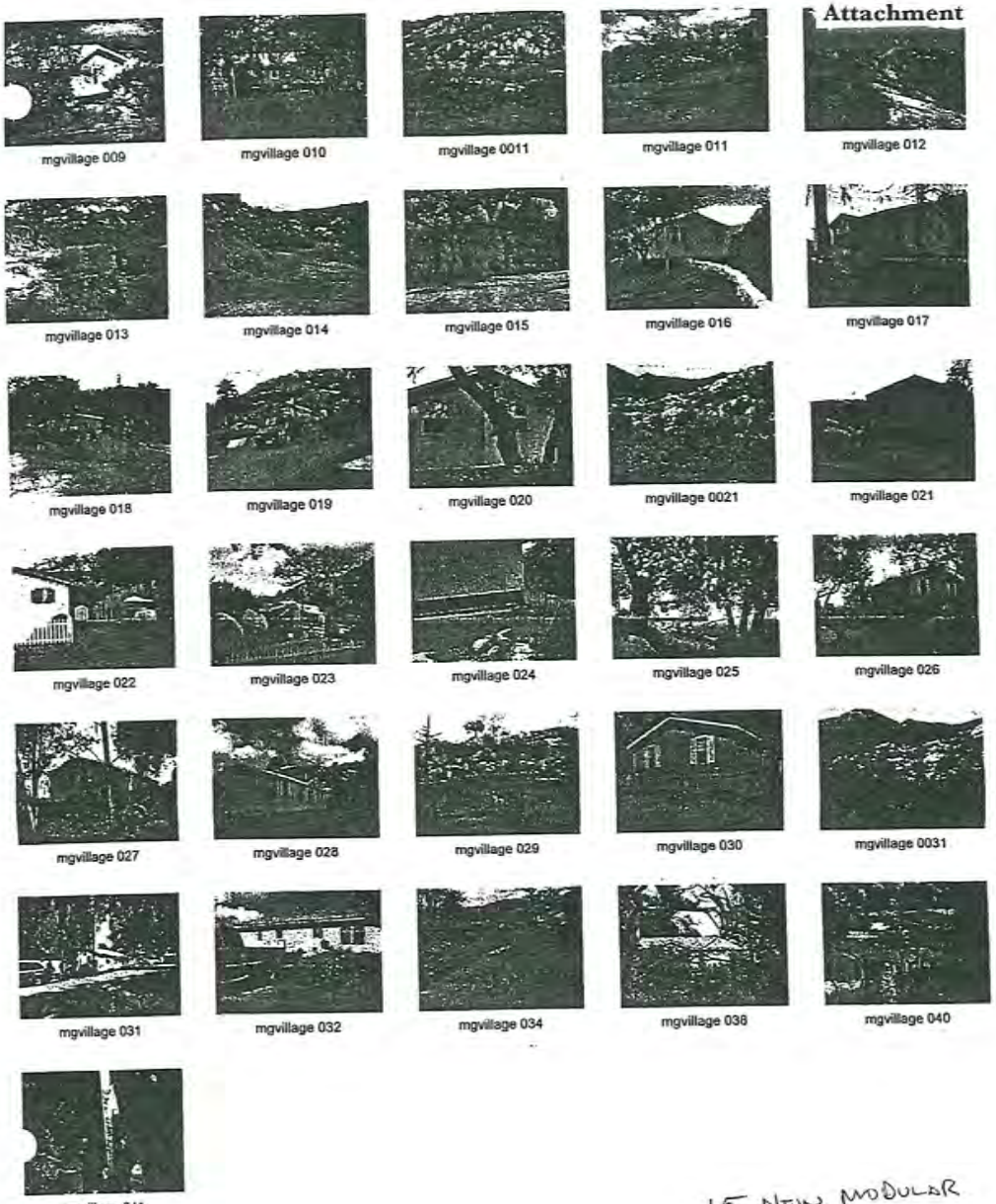
Sincerely,

James Chagala
JAMES CHAGALA, Chief
Northern Planning Area

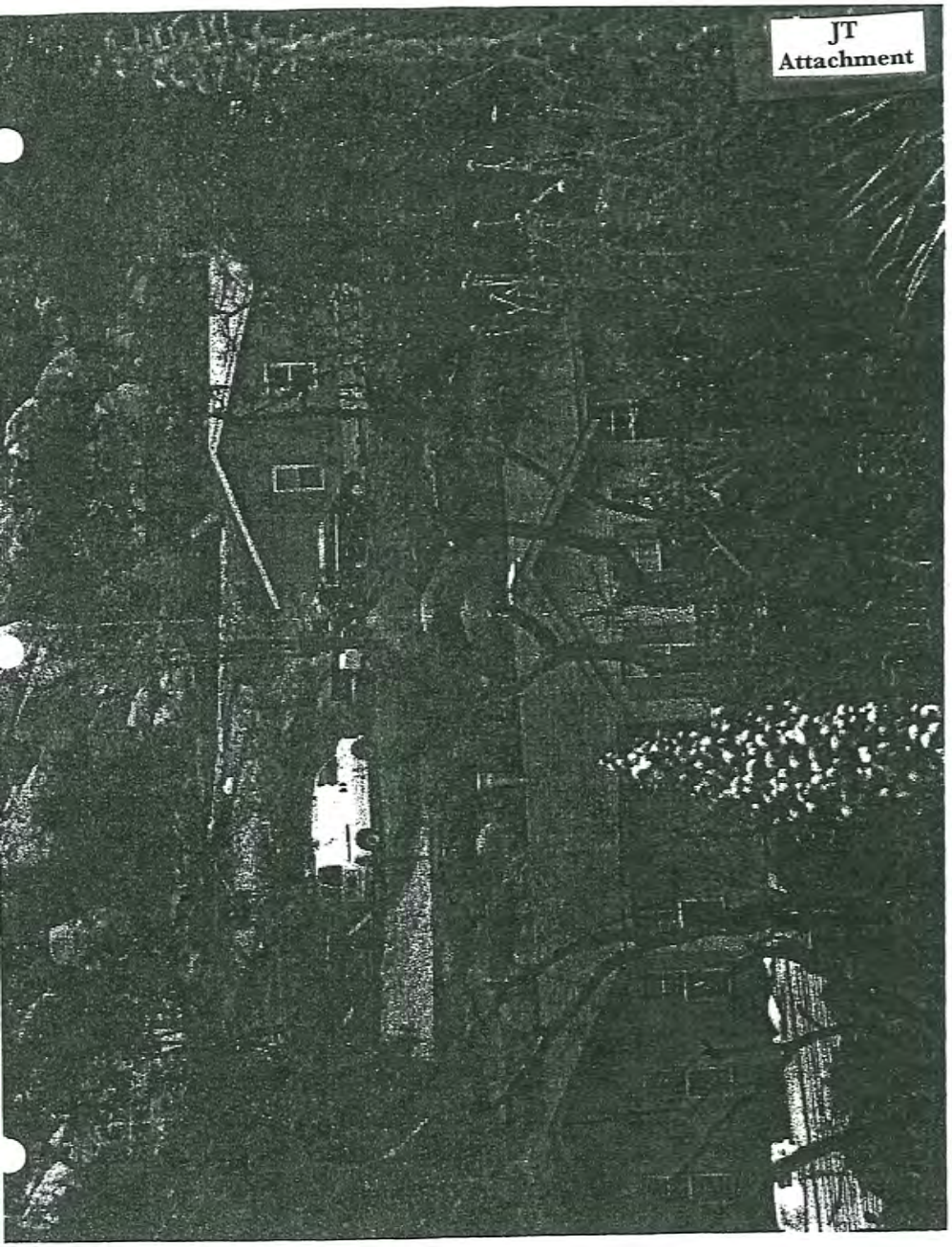
JCC:DL:jb

AUTHOR\NPLTRDL1.495

JT
Attachment



≈15 NEW MODULAR HOMES.


JT
Attachment

MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

P.O. Box 683
Ramona, CA 92065
(760) 787 - 0794 T
(706) 788 - 5479 F

Steering Committee:
Diane Conklin, Spokesperson
Carol Levin, Treasurer
Bruce Meador, Member
Donna Schneider, Member
Joseph Mitchell, Member

BIOLOGY CHAPTER

By Bonnie Morgal

BIOLOGICAL RESOURCES COMMENTS
FOR THE SALVATION ARMY EIR AND MSCP CONFORMANCE FINDINGS

Bonnie J. Hendricks

General Comments

The focused surveys for all sensitive plant and wildlife species are outdated, as they were conducted between 1999 and 2001. Additionally, ecological conditions in the immediate area are significantly different because of the recent Cedar fire in October 2003 and the exceptionally wet 2004/2005 rainy season. On this basis alone, it is anticipated that a Supplemental EIR will be required because of substantial new information that will have to be reported to comply with California Environmental Quality Act (CEQA), Federal Endangered Species Act (FESA), and California Endangered Species Act (CESA) requirements. The U.S. Fish and Wildlife Service (USFWS) typically considers all threatened and endangered (T&E) species surveys to be valid for only one year following completion of protocol surveys, and 2 to 3 years for all other species surveys. The California Department of Fish and Game (CDFG) has similar standards and will also require updated focused sensitive species surveys. **JB1**

Current focused/protocol surveys will need to be conducted for listed wildlife species with a potential for occurring onsite or within 500 feet of the parcel boundaries (because of the potential for indirect impacts). These species surveys should include California gnatcatcher, least Bell's vireo, Stephen's kangaroo rat, arroyo toad, and Quino checkerspot butterfly. Current focused surveys should also be provided for other sensitive wildlife species (e.g., bats, reptiles, raptors including golden eagle, and other sensitive avian species). **JB2**

A wildlife movement study based on field data collection using a sound research design and trained wildlife trackers is essential to adequately evaluate corridor and linkage impacts. No wildlife movement studies have been performed to date for this project. The multiple year study being conducted by the County in the Wildcat Canyon Road area provides a good model. **JB3**

An updated focused survey for all potentially occurring rare plant species should be conducted. The high rainfall this 2004/2005 rainy season has resulted in display of more plant species in many areas than found over the previous several years of drought. Particular attention should be focused on Encinitas baccharis (federally and state listed) and lakeside lilac. Encinitas baccharis has a high likelihood of occurrence on the property given that it is known from Iron Mountain and suitable habitat exists onsite. Furthermore, this species is extremely difficult to detect in dense chaparral even if surveys are conducted during the appropriate blooming period due to its cryptic appearance, growth habit within and sometimes under dense brush, and the impenetrable nature of mature chaparral. Encinitas baccharis responds with increased numbers and density after wildfire and is much easier to detect after the habitat has opened up post-fire **JB4**

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, BIOLOGY CHAPTER (JB SERIES) DATED MARCH 28, 2005

Response to Comments JB1 through JB32

Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comment Letter I.

and become accessible on foot. Similar parameters apply to lakeside lilac, which is also known from the Iron Mountain foothills and also responds well to wildfire. **JB4 (cont'd)**

The biological surveys provided as part of this EIR are outdated and therefore do not provide adequate disclosure of the environmental impacts created by the proposed project. The completion of biological surveys to regulatory standards could add substantial new information to the project, which would require preparation of a supplemental EIR. **JB5**

The EIR and Biological Technical Report maps are nearly unreadable in both printed and electronic versions of the documents. It is unclear from all of the site plan maps (starting with Figure 1-4) which features are existing and which are proposed, as they have the same line types and are only distinguished by tiny numbers corresponding to a long list of features in small print. The area shown as fire buffer zone appears to be outside of the project footprint. The fire buffer zone would impact biological resources, but it is not clear whether these impacts were included in the analysis. **JB6**

The biological resources maps (starting with Figure 2.2-1) are even more difficult to read. The overlay of biological resources onto the busy site plan is barely discernable. The master plan details and legend are not necessary and obscure the biological information. The overall proposed footprint boundary is too faint to make out in some areas and the hatching type also obscures the other information. There is no scale to the map and the legend symbols are indiscernible. County acceptable scales are 1" = 20' through 1" = 200'. The maps must be legible according to County requirements. **JB7**

The wetland delineation maps are confusing and illegible, despite the two enlarged segments shown. The wetland mitigation site is not clearly indicated on the map. **JB8**

The County requires mapping of wetland buffers of a minimum of 25 feet and a maximum of 200 feet depending on a number of factors, which are listed in the County's Biological Mapping Requirements. Presumably, if all of the factors are positive, the maximum buffer width of 200 feet would be most appropriate. The onsite wetlands are positive for all of the factors listed, as shown in the Biological Technical Report. These include 1) existence of hydrophytic vegetation, 2) high quality condition of the existing wetland, 3) wetland/buffer serves as a wildlife corridor, 4) existence of sensitive species, and 5) connectivity and high quality condition of the wetland up and down stream. Therefore, the maximum buffer width of 200 feet should be applied to the onsite wetlands, rather than a buffer close to the minimum requirement of 25 feet as currently shown on the wetland delineation maps. **JB9**

Biological resources mapping must include the project parcel plus 100 feet onto the adjoining properties according to County requirements. This offsite buffer zone is not clearly depicted on the maps. Significant habitat features such as rock outcroppings must be identified on the map, according to County requirements. No such features are identified on the maps. It is not apparent where fire-clearing zones are included in the project footprint. **JB10**

Attachment A of the California Department of Fish and Game (CDFG) letter is missing from the EIR. This attachment provides the list of Rare Natural Communities, which CDFG requires be fully avoided by the project. **JB11**

MSCP Findings of Conformance

It is stated in the EIR and Findings of Conformance that the project site is located within the Multiple Species Conservation Program (MSCP), outside of any pre-approved mitigation area. This statement is incorrect for two reasons. A portion of the site is within the MSCP pre-approved mitigation area in the southwest corner of the site (refer to map on last page of Findings). Secondly, the Salvation Army property is fully encompassed within a preserve acquisition area identified by CDFG and the County in the Conceptual Area Acquisition Plan (CAAP) for Iron Mountain Ridge – Canada de San Vicente Preserve. The CAAP was approved and adopted by the County and CDFG in 1999. The CAAP, in conjunction with the MSCP, has resulted in the acquisition of approximately 2,714 acres of habitat bordering the Salvation Army property. The preserve includes the former Boys and Girls Club property and the Boulder Oaks Ranch, which were identified in the CAAP as the top two acquisition priorities. The Salvation Army property along with several other parcels, collectively referred to as the Iron Mountain Palisades – Golden Eagle Nest Area, are identified in the CAAP as the third acquisition priority for the preserve. **JB12**

The following discussion is relevant to the **Design Criteria for Linkages and Corridors, numbers 1 to 10**. Within the MSCP Findings of Conformance, a serious error is made by concluding that the Salvation Army property does not contain a habitat linkage. The justification for this assumption was that the property was not identified as a biological core and linkage area in the Subarea Plan. However, the Findings of Conformance require that habitat linkages, as defined by the BMO, rather than just corridors, be maintained. Linkage is defined in the BMO as "an area of land which supports or contributes to the long-term movement of wildlife and genetic material." **JB13**

No wildlife movement studies were done, nor even a map-based analysis of appropriate movement routes along valleys, canyons, ridgelines, and trails to larger offsite blocks of open space habitat. No analysis of surrounding undeveloped open space and existing preserves was included, nor even any mention of the adjacent wilderness preserves.

The author of these comments is a professional biologist of 18 years and was a founding member of the Iron Mountain Conservancy Tracking Team (1995-99) and subsequently a founding member of the Mount Woodson Wildlife Trackers (1999 to present). The following analysis is based on current aerial photographs, USGS topographic maps, and regional vegetation mapping. Additionally recent field visits to surrounding properties and several years of wildlife tracking and hiking in the region (including the Salvation Army property), indicate the following results.

The Salvation Army property is bordered by unencumbered open space around most of its perimeter and provides an important regional connection between existing large blocks of open space. The few scattered residences in this area along Mussey Grade Road have little effect on north-south movement of wildlife, but have some effect on restricting east-west movement to key drainages that connect Iron Mountain Open Space via Salvation Army to the large blocks of open space to the east. Existing ranchland and equestrian uses on adjacent properties do not block the major wildlife travel routes. The Salvation Army property clearly and undeniably contains a regional habitat linkage.

JB13 (cont'd)

The Findings of Conformance are flawed because of the erroneous assumption that the site does not encompass a habitat linkage. Only one wildlife corridor is discussed. However, an important set of corridors on the Salvation Army property form a regional habitat linkage. This linkage is encompassed by the valleys and lower slopes of oak woodland, coastal sage scrub, grassland, and chaparral along the eastern portion of the site. These valleys and lower slopes connect offsite habitats to the north from Dos Picos County Park, and Golden Eagle Ranch West with the offsite habitats to the south on the Boulder Oaks Ranch Preserve (via two routes: Wildwood Ranch and the Heller/Meador Ranches). An interconnected series of broad, wooded meadows extend through all of these properties and then drop down via the steep Foster Canyon into MSCP Preserve (former Boys and Girls Club), San Vicente Reservior open space and beyond. The Salvation Army regional linkage is also important because it helps maintain the broader east-west connections between Iron Mountain and undeveloped high quality habitats extending east of the West Fork of San Vicente Creek ultimately into the BLM open space, Monte Vista Ranch, Oak Oasis Park, Silverwood Wildlife Sanctuary, El Capitan Open Space Preserve, and Cleveland National Forest, South Section.

Onsite movement corridors associated with this linkage include: 1) a short portion of the West Fork of San Vicente Creek, 2) the east-west corridor along a tributary creek to the West Fork, and 3) the major north-south wildlife corridor in this region. The onsite portion of this north-south corridor includes a broad valley from the south (wooded meadows and scrub), the lower slopes around a central hill including trails and dirt road, a trail that drops into the tributary creek, and a north-south branch of tributary creek that leads offsite to the north.

The proposed project and alternatives would impact the majority of habitat within this onsite linkage. The onsite habitat linkage is important for regional movement of wildlife as described above. In addition, it is important for maintaining genetic exchange for plant and animal species, particularly those species reliant on the lower-lying oak woodland, wetland, coastal sage scrub, and grassland habitats.

The east-west travel route along the tributary creek will be impinged on by improvements to the main road into the facility plus a dramatic increase in number of daily trips on this road. The north-south travel route will be blocked by development wrapping around the lower slopes of the central hill and extending through the broad, wooded valley to the south. Therefore, the MSCP Findings of Conformance cannot be supported.

The BMO Project Design Criteria (page 5, number 1) require that project development shall be sited in areas to minimize impact to habitat. **The BMO Preserve Design Criteria and Subarea Plan Findings** require measures to maximize the habitat structural diversity of conserved habitat areas (page 6, number 2; page 13, number 2); provide for the conservation of spatially representative examples of coastal sage scrub and other high value habitats (page 7, number 3; page 12, number 3); and provides for development in the least sensitive habitat areas (page 7, number 5; page 13, number 5). **JB14**

The Findings state that the project design has minimized impacts to habitat given the amount of land to be protected and the avoidance of the more sensitive vegetation types **(BMO Criteria 1)**; and that development has been focused on the habitat types with the lowest sensitivity **(Preserve Design Criteria 5)**. A detailed habitat area based analysis indicates otherwise. The Findings report: "The project will impact a total of 73.74 acres of habitat." What is not stated is that 28.57 acres or 39% of the lands impacted include the most sensitive habitat types (Tier-1 and Tier-II). Only 15% of the lands to be conserved, i.e., left undeveloped, contain the most sensitive habitat types (Tier-I and Tier-II). The development is clearly concentrated in the highest quality, most sensitive habitat areas. One-third (34%) of all coast live oak woodland habitat (Tier I) mapped on the property would be impacted by the project; nearly three-quarters (74%) of all Diegan coastal sage scrub (Tier II) would be impacted by the project. In addition, the project proposes impacts to wetland (Tier 1) habitats that could be avoided (i.e. those resulting from foot traffic and brush clearing).

Although a lower percentage of the high elevation coastal sage /chaparral scrub would be impacted by the project (18%), this habitat does not contain the same value as the lower elevation Diegan coastal sage scrub in terms of potential for California gnatcatcher and other sensitive coastal sage scrub-dependent species. The Diegan coastal sage scrub onsite is a highly diverse and high quality habitat. Some areas contain Engelmann oak woodland interspersed.

One-third of all coast live oak woodland would be impacted (34%). Note that although a smaller percent of the coast live oak riparian forest acreage would be impacted (4%), a substantial length of the wetlands along this riparian corridor (more than half the total length of the riparian habitat) may be impacted by road improvements including clearing for fire protection and foot traffic. The County required mapping and protection of wetland buffers should be closer to 200 feet rather than 25 feet for this high quality riparian wetland/wildlife corridor. A long span of impact into this wetland would be in conflict with the Preserve Design Criteria.

Regarding Preserve Design Criteria 2 and Subarea Plan Finding 2. The most structurally diverse habitat area onsite is an interconnected mosaic of oak woodlands, wetlands, coastal sage scrub, grasslands, chaparral, and oak riparian forest within the eastern one-third of the project site (see Figure 4-5 in the EIR). This mosaic of the highest quality habitats coincides closely with the development footprint of Alternative I as evidenced by the Figure 4-5 in the EIR. Almost the entire structurally diverse habitat **JB15**

area will be developed and/or fragmented (excluding the northeastern corner). The remaining habitats to be left undeveloped are predominantly large blocks of southern mixed chaparral (76%) and other types of chaparral (8% sage scrub/chaparral and 1% mafic southern mixed chaparral). Disturbed and developed lands comprise 3% and more diverse habitats comprise about 12% (northeast corner of property) of the land not currently proposed for development. **JB15 (cont'd)**

Regarding Preserve Design Criteria 3 and Subarea Plan Finding 3. The project does not adequately conserve spatially representative examples of extensive patches of coastal sage scrub and coast live oak woodland. The extensive patches of classic Diegan coastal sage scrub onsite will be impacted (74% loss). Nearly all of the extensive patches of coast live oak woodland, which occupy the broad valley floor, will be impacted and/or fragmented. One-third of the coast live oak woodland acreage mapped on the site, would be removed by the project. This impact does not include all of the indirect impacts to oak trees through soil compaction within the critical root zone. The only patches of coast live oak woodland that would not be directly impacted, are small isolated fragments of the existing contiguous canopy, which would likely be degraded or lost through indirect impacts (see Figure 4-5 in the EIR). **JB16**

The project also does not comply with **Preserve Design Criteria 4 and 7 and Subarea Plan Findings 4, 9, 10, and 11.** The proposed open space is configured as two to four separate islands that do not connect to one another or to the adjacent offsite open space. The open space as currently designed is fragmented and is contrary to preserve design standards and guidelines put forth in the BMO and MSCP Subarea Plan. The onsite preserve was designed with complete disregard for connection to open space preserves adjacent to the project boundary and wildlife movement corridors (see above discussion for Design Criteria for Linkages and Corridors). None of the configurations shown (i.e., for proposed project or alternatives) connect with the extensive MSCP open space preserve to the south (CDFG/County). Most or all of the onsite preserve islands also do not connect with the Iron Mountain open space preserve (City of Poway) to the west. The remaining onsite area is not currently proposed for development; however, there are no guarantees as to how much additional carving out of habitats due to trails, camp sites, or other clearings or structures for recreation, education, or other purposes will occur in the future. **JB17**

Subarea Plan Findings 7 requires special emphasis on conserving adequate foraging habitat near golden eagle nest sites. The project lies less than a mile away from a known golden eagle nesting site. The project site currently provides a significant foraging area when the onsite habitat is combined with the contiguous meadows of Boulder Oaks Ranch, Wildwood Ranch, and Golden Eagle West Ranch. This is the closest foraging habitat available to the nest site and has been recognized as an important foraging area by monitoring of this pair. No effort has been made to minimize impacts to this foraging habitat for golden eagle. More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. This habitat would therefore become useless for eagle foraging. **JB18**

Preserve Design Criteria 8 and Subarea Plan Findings 8.
The Findings (page 2, second paragraph) state that the project will preserve 100% of the three County Group-A sensitive plant species onsite and that no mitigation is required other than measures to protect the open space. The mapped populations are not currently proposed for development, but neither are they proposed for preservation in open space. Most of these rare plant populations lie outside the proposed open space areas and are immediately adjacent to the hiking trails that will become heavily impacted by potential use from hundreds of users per day. A minimum of 80% preservation of Group-A species populations is required onsite. However, there are no assurances that any of these populations will be preserved, nor are there adequate measures to protect them from recreation-related impacts. **JB19**

An analysis of impacts to the nesting pair of golden eagles was provided in the technical appendices, but is omitted from this discussion. Heavy recreational use of trails at a distance much less than 4,000 feet from the nest site would occur as a result of the project. The distance at which an eagle flies from the nest when approached by a human on foot is between ½ and ¾ mile. The heavy use of trails within this zone by potentially hundreds of people per day is very likely to cause abandonment of the nest. In addition, the potential for illegal off-trail climbing to Sole Peak and impacts to foraging habitat are not addressed. The Salvation Army is part of an important foraging area for the golden eagles, which is delineated in the map at the end of Appendix 10.

Conclusion. Given the above stated facts and the serious flaws in the analysis for the MSCP Findings of Conformance, the project cannot be considered viable.

MSCP Conformance Findings cannot be made for the following reasons: **JB20**

- The regional habitat linkage made up by both north-south and east-west wildlife movement corridors has not been maintained (Design Criteria for Linkages and Corridors 1-10)
- Project development is not sited in areas to minimize impact to habitat (BMO Criteria 1)
- Habitat structural diversity of conserved habitat areas is not maximized (BMO Preserve Design Criteria 2 and Subarea Plan Findings 2)
- Conservation of spatially representative examples of coastal sage scrub and other high value habitats are not provided (BMO Preserve Design Criteria 3 and Subarea Plan Findings 3)
- Development is not focused in the least sensitive habitat areas (BMO Preserve Design Criteria 5 and Subarea Plan Findings 5)
- Preserved habitat is provided in several separate islands that do not connect with one another or the existing open space preserves bordering the property. No guarantees are given that areas not proposed for development will remain intact (Preserve Design Criteria 4, 7 and Subarea Plan Findings 4, 9, 10, 11)
- Special emphasis has not been placed on conserving adequate foraging habitat near golden eagle nest sites (Subarea Plan Finding 7)

Alternatives I, II, and proposed project each fail to meet the standards necessary to conform to the BMO Project Design Criteria, Preserve Design Criteria, and Design Criteria for Linkages and Corridors, and to conform with the objectives of the County MSCP Subarea Plan. **JB20 (cont'd)**

The BMO applies to all land in the County within the boundaries of the MSCP, and the BMO applies to discretionary projects subject to CEQA, such as the proposed project. "No project requiring a discretionary permit shall be approved unless a finding is made that the project is consistent with the MSCP Plan, The County Subarea Plan, and the provisions of this Ordinance." (BMO, Article II.) No such findings can be made, therefore, this project cannot be approved.

Specific EIR Comments

Page 2.2-1 and Figure 2.2-1. No Engelmann oak woodland as a habitat type was mapped or described despite some of the habitat onsite containing substantial numbers and cover of this species, if not a dominance. Please explain. **JB21**

Page 2.2-6 Sensitive Plant Species. There is no mention of sensitive plant species that have a potential to occur onsite, but that were not detected during surveys, such as Encinitas baccharis and Lakeside lilac, among others. It is misleading to presume that sensitive species not found during surveys do not occur onsite. Please add a discussion of these species and a description of the survey limitations. **JB22**

Page 2.2-7 Sensitive Wildlife Species. There is no mention of sensitive wildlife species that would have a potential to occur onsite, but that were not detected during surveys, such as bat species, ringtail, and mountain lion, among others. It is misleading to presume that sensitive species not found during surveys do not occur onsite. Please add a discussion of these species and a description of the survey limitations.

Page 2.2-9 Wildlife Corridors. No wildlife movement studies were done, nor even a map-based analysis of appropriate movement routes along valleys, canyons, ridgelines, and trails to larger offsite blocks of open space habitat. No analysis of surrounding undeveloped open space and existing preserves was included, nor even any mention of the adjacent wilderness preserves. The primary argument made in the EIR wildlife corridor section is that there is insufficient habitat connectivity to the north, east, and south for a regional corridor to exist. There is no evidence to substantiate this claim. **JB23**

The author of these comments is a professional biologist of 18 years and was a founding member of the Iron Mountain Conservancy Tracking Team (1995-99) and subsequently a founding member of the Mount Woodson Wildlife Trackers (1999 to present). The following analysis is based on current aerial photographs, USGS topographic maps, and regional vegetation mapping. Additionally recent field visits to surrounding properties and several years of wildlife tracking and hiking in the region (including the Salvation Army property), indicate the following results.

The Salvation Army property is bordered by unencumbered open space around most of its perimeter and provides an important regional connection between existing large blocks of open space. The few scattered residences in this area along Mussey Grade Road have little effect on north-south movement of wildlife, but have some effect on restricting east-west movement to key drainages that connect Iron Mountain Open Space via Salvation Army to the large blocks of open space to the east. Existing ranchland and equestrian uses on adjacent properties do not block the major wildlife travel routes. The Salvation Army property clearly and undeniably contains a regional habitat linkage. **JB23** (cont'd)

The EIR only discusses one wildlife corridor. However, an important set of corridors on the Salvation Army property form a regional habitat linkage. This linkage is encompassed by the valleys and lower slopes of oak woodland, coastal sage scrub, grassland, and chaparral along the eastern portion of the site. These valleys and lower slopes connect offsite habitats to the north from Dos Picos County Park, and Golden Eagle Ranch West with the offsite habitats to the south on the Boulder Oaks Ranch Preserve (via two routes: Wildwood Ranch and the Heller/Meador Ranches). An interconnected series of broad, wooded meadows extend through all of these properties and then drop down via the steep Foster Canyon into MSCP Preserve (former Boys and Girls Club), San Vicente Reservior open space and beyond. The Salvation Army linkage is also important because it helps maintain the broader east-west connections between Iron Mountain and undeveloped high quality habitats extending east of the West Fork of San Vicente Creek ultimately into the BLM open space, Monte Vista Ranch, Barona Indian Reservation, Oak Oasis Park, Silverwood Wildlife Sanctuary, and Cleveland National Forest.

Onsite movement corridors associated with this linkage include a short portion of the West Fork of San Vicente Creek, the east-west corridor along a tributary creek to the West Fork, and the major north-south wildlife corridor in this region. The onsite portion of this north-south corridor includes a broad valley from the south (wooded meadows and scrub), the lower slopes around a central hill including trails and dirt road, a trail that drops into the tributary creek, and a north-south branch of tributary creek that leads offsite to the north.

The onsite habitat linkage is also important for genetic exchange of plant and animal species on a regional basis, particularly for those species reliant on the lower-lying oak woodland, wetland, coastal sage scrub, and grassland habitats.

These wildlife corridors and habitat linkage must be addressed and thoroughly evaluated. A wildlife movement study based on field data collection using a sound research design and trained wildlife trackers is essential to adequately evaluate corridor and linkage impacts.

Page 2.2-12. Analysis of Project Effects and Determination of Significance. Please clarify that indirect impacts to oaks were calculated based on distances from the edge of canopy and not from the trunk (i.e., canopy edge of oak trees within 25 feet from ground altering impact or 20 feet from waterline and other trenching activities). **JB24**

Please provide a map clearly showing all infrastructure impacts, including permanent and temporary impact zones for trenches, leach fields, other septic and water related infrastructure, improvements to trails or construction of new trails, etc.

Why would there be no substantial change in foot traffic between existing and proposed staff housing? **JB24 (cont'd)**

Page 2.2-13 Tier I Habitats. It is not clear how impact acreages for oaks were derived. Please explain how indirect impacts were assessed. Were oak trees indirectly impacted through soil compaction and other root zone impacts included in the impact calculations? Indirect impacts to oak trees from the unseasonal persistence of water near new leach fields, irrigated landscape, and other water sources needs to be addressed. **JB25**

An oak tree inventory, including trunk diameters and canopy widths for both oak tree species should be conducted. How many coast live oak trees will be removed by the project, and how many are expected to be lost over time through compaction, unseasonal water, or other impacts to their root zone?

How were impacts assessed for the coast live oaks trees that were not mapped within oak woodland habitat? Is it true that certain oak trees were deemed not to have biological value because of understory impacts and were not included in the impact analysis?

Describe where the wetland impacts will occur and why they cannot be avoided. The project should be designed to avoid impacts to 0.10 acre of wetlands from foot traffic. The ACOE and CDFG generally do not issue permits for wetland impacts that they consider avoidable.

Page 2.2-15. Sensitive Plant Species. Indirect impacts to Ramona horkelia, Gander's butterweed, and felt-leaved monardella are not adequately addressed. These species populations are not proposed for protection in open space. They lie immediately adjacent to the hiking trails that will become heavily impacted by potential use from up to 748 users per day. There are no assurances that any of these populations will be preserved, nor are there adequate means to protect them from a heavy stream of camp users. Fencing would impact the populations, but signs and foot stakes would be inadequate to protect the populations from such heavy use. **JB26**

Page 2.2-16. Sensitive Wildlife Species.

The impact section is incomplete, as it does not address impacts to all of the sensitive wildlife species detected on the project site, nor to the species that are likely to occur onsite but not detected during surveys. **JB27**

Sensitive wildlife species surveys are outdated and would no longer be considered valid by the USFWS and CDFG. Therefore, an accurate impact analysis for sensitive wildlife

cannot be completed even if attempted from existing data. Current focused surveys should be conducted for all sensitive wildlife.

JB27 (cont'd)

An analysis of impacts to the nesting pair of golden eagles was provided in the technical appendices, but is omitted from this discussion. Heavy recreational use of trails at a distance much less than 4,000 feet from the nest site would occur as a result of the project. The distance at which an eagle flies from the nest when approached by a human on foot is between ½ and ¾ mile. The heavy use of trails within this zone by potentially hundreds of people per day is very likely to cause abandonment of the nest. In addition, the potential for illegal off-trail climbing to Sole Peak and impacts to foraging habitat are not addressed. The Salvation Army is part of an important foraging area for the golden eagles, which is delineated in the map at the end of Appendix 10. This map was omitted from the bound copy of the EIR technical appendices, but was still available online. More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. The conversion of this important eagle foraging habitat to developed and fragmented lands would be significant.

Page 2.2-16. Edge Effects.

JB28

The analysis of edge effects or indirect impacts from the project is inadequate. Numerous adverse effects to biological resources will occur that have not been addressed. A few of these impacts include invasion of exotic species from increased disturbance, erosion of creek banks, sedimentation, runoff, contamination from pesticides, herbicides, nitrates, and other pollutants. Significant impacts would occur from the heavy use of habitats throughout the property by camp users. These impacts should be individually addressed and may include the following: trampling of vegetation; soil compaction; erosion from hiking and biking; collecting of plants and wildlife (such as horned lizards); digging; wood cutting; removal of dead wood and leaves; building dams; use of bright flashlights; nighttime noise; discarding trash; discarding food which facilitates invasion of Argentine ants; urinating and defecating in creeks and other habitat areas; unauthorized shooting, trapping, smoking, camp fires, fireworks, and explosives.

JB29

Page 2.2-17. Pruning oak branches after trenching within their root zone does not reverse the damage done to trees through root severing. Pruning in excess of 10 percent of the tree is in itself an adverse impact that increases the tree's susceptibility to disease and decreases vigor. Once thought to be essential, it is no longer recommended to prune the canopy in an amount commensurate with root loss. Canopy pruning would constitute an additional impact rather than mitigating the impact from root loss.

Further, this mitigation measure does nothing to address the significant impacts of irrigation, soil compaction, and filling and paving in and around the oaks. These impacts remain significant and unmitigated.

It does not follow that landscaping without using invasive exotics mitigates for the spread of pre-existing invasive species caused by habitat disturbance. This impact should be

mitigated proactively by adopting an adequately funded adaptive management program to remove exotic species invasions on an ongoing basis. The Findings of Conformance state that native landscaping is to be used onsite. This should also be incorporated as a mitigation measure for significant impacts from the threat of increased invasion of exotic species. **JB29 (cont'd)**

Page 2.2-17. Consistency with Applicable Habitat or Natural Community Plans. Impact 2.2.1 refers to non-compliance of the proposed project to design criteria in the BMO. The project Alternatives I and II also do not comply with the criteria of the BMO and MSCP Subarea plan for the following reasons: **JB30**

The Findings state that the project design has minimized impacts to habitat given the amount of land to be protected and the avoidance of the more sensitive vegetation types (BMO Criteria 1); and that development has been focused on the habitat types with the lowest sensitivity (Preserve Design Criteria 5). A detailed habitat area based analysis indicates otherwise.

The Findings report: "The project will impact a total of 73.74 acres of habitat." What is not stated is that 28.57 acres or 39% of the lands impacted include the most sensitive habitat types (Tier-1 and Tier-II). Only 15% of the lands to be conserved, i.e., left undeveloped, contain the most sensitive habitat types (Tier-I and Tier-II). The development is clearly concentrated in the highest quality, most sensitive habitat areas. One-third (34%) of all coast live oak woodland habitat (Tier I) mapped on the property would be impacted by the project; nearly three-quarters (74%) of all Diegan coastal sage scrub (Tier II) would be impacted by the project. Impacts to wetland (Tier 1) habitats that could be avoided (i.e. those resulting from foot traffic and brush clearing) are proposed. The County required mapping and protection of wetland buffers should be closer to 200 feet rather than 25 feet for this high quality riparian wetland/wildlife corridor. A long span of impact into this wetland would be in conflict with the Preserve Design Criteria.

The project fails to comply with the impact-avoidance design criteria in the BMO, Article V, Section A1.

Regarding Preserve Design Criteria 2 and Subarea Plan Finding 2. The most structurally diverse habitat area onsite is an interconnected mosaic of oak woodlands, wetlands, coastal sage scrub, grasslands, chaparral, and oak riparian forest within the eastern one-third of the project site (see Figure 4-5). This mosaic of the highest quality habitats coincides closely with the development footprint of Alternative I as evidenced by the Figure 4-5 in the EIR. Almost the entire structurally diverse habitat area will be developed and/or fragmented (excluding the northeastern corner). The remaining habitats to be left undeveloped are predominantly large blocks of southern mixed chaparral (76%) and other types of chaparral (8% sage scrub/chaparral and 1% mafic southern mixed chaparral). Disturbed and developed lands comprise 3% and more diverse habitats comprise about 12% (northeast corner of property) of the land not currently proposed for development under Alternative I.

Regarding Preserve Design Criteria 3 and Subarea Plan Finding 3, the project does not adequately conserve spatially representative examples of extensive patches of coastal sage scrub and coast live oak woodland. The extensive patches of classic Diegan coastal sage scrub onsite will be impacted (74% loss). Nearly all of the extensive patches of coast live oak woodland, which occupy the broad valley floor, will be impacted and/or fragmented. One-third of the coast live oak woodland acreage mapped on the site, would be removed by the project. This impact does not include all of the indirect impacts to oak trees through soil compaction within the critical root zone. The only patches of coast live oak woodland that would not be directly impacted, are small isolated fragments of the existing contiguous canopy, which would likely be degraded or lost through indirect impacts (see Figure 4-5 in the EIR). **JB30** (cont'd)

The project also does not comply with Preserve Design Criteria 4 and 7 and Subarea Plan Findings 4, 9, 10, and 11. The proposed open space is configured as two to four separate islands that do not connect to one another or to the adjacent offsite open space. The open space as currently designed is fragmented and is contrary to preserve design standards and guidelines put forth in the BMO and MSCP Subarea Plan. The onsite preserve was designed with complete disregard for connection to open space preserves adjacent to the project boundary and wildlife movement corridors (see above discussion for Design Criteria for Linkages and Corridors). None of the configurations shown (i.e., for proposed project or alternatives) connect with the extensive MSCP open space preserve to the south (CDFG/County). Most or all of the onsite preserve islands also do not connect with the Iron Mountain open space preserve (City of Poway) to the west. The remaining onsite area is not currently proposed for development; however, there are no guarantees as to how much additional carving out of habitats due to trails, camp sites, or other clearings or structures for recreation, education, or other purposes will occur in the future.

Subarea Plan Findings 7 requires special emphasis on conserving adequate foraging habitat near golden eagle nest sites. The project lies less than a mile away from a known golden eagle nesting site. The project site currently provides a significant foraging area when the onsite habitat is combined with the contiguous meadows of Boulder Oaks Ranch, Wildwood Ranch, and Golden Eagle West Ranch. This is the closest foraging habitat available to the nest site and has been recognized as an important foraging area by monitoring of this pair. No effort has been made to minimize impacts to this foraging habitat for golden eagle. More than half of the non-native grassland onsite (54%) would be impacted by the project, and virtually all of the open habitat on the property would be fragmented by development. This habitat would therefore become useless for eagle foraging.

Preserve Design Criteria 8 and Subarea Plan Findings 8.
The Findings state that the project will preserve 100% of the three County Group-A sensitive plant species onsite and that no mitigation is required other than measures to protect the open space. The mapped populations are not currently proposed for development, but neither are they proposed for preservation in open space. Most of these

rare plant populations lie outside the proposed open space areas and are immediately adjacent to the hiking trails that will become heavily impacted by potential use from hundreds of users per day. A minimum of 80% preservation of Group-A species populations is required onsite. However, there are no assurances that any of these populations will be preserved, nor are there adequate measures to protect them from recreation-related impacts.

JB30 (cont'd)

An analysis of impacts to the nesting pair of golden eagles was provided in the technical appendices, but is omitted from this discussion. Heavy recreational use of trails at a distance much less than 4,000 feet from the nest site would occur as a result of the project. The distance at which an eagle flies from the nest when approached by a human on foot is between ½ and ¾ mile. The heavy use of trails within this zone by potentially hundreds of people per day is very likely to cause abandonment of the nest. In addition, the potential for illegal off-trail climbing to Sole Peak and impacts to foraging habitat are not addressed. The Salvation Army is part of an important foraging area for the golden eagles, which is delineated in the map at the end of Appendix 10.

Given the above stated facts and the serious flaws in the analysis for the MSCP Findings of Conformance, the project cannot be considered viable. The proposed project and Alternatives I and II fail to meet the standards necessary to conform with the BMO Project Design Criteria and Preserve Design Criteria and to conform with the objectives of the County MSCP Subarea Plan.

The BMO applies to all land in the County within the boundaries of the MSCP, and the BMO applies to discretionary projects subject to CEQA, such as the proposed project. "No project requiring a discretionary permit shall be approved unless a finding is made that the project is consistent with the MSCP Plan, The County Subarea Plan, and the provisions of this Ordinance." (BMO, Article II.) No such findings can be made, therefore, this project cannot be approved.

Page 2.2-18. Wildlife Corridors

The following discussion is relevant to the Design Criteria for Linkages and Corridors, numbers 1 to 10. Within the EIR, a serious error is made by concluding that the Salvation Army property does not contain a habitat linkage. The justification for this assumption was that the property was not identified as a biological core and linkage area in the Subarea Plan. However, the Findings of Conformance require that habitat linkages, as defined by the BMO, rather than just corridors, be maintained. Linkage is defined in the BMO as "an area of land which supports or contributes to the long-term movement of wildlife and genetic material."

JB31

No wildlife movement studies were done, nor even a map-based analysis of appropriate movement routes along valleys, canyons, ridgelines, and trails to larger offsite blocks of open space habitat. No analysis of surrounding undeveloped open space and existing preserves was included, nor even any mention of the adjacent wilderness preserves.

As detailed in comments above for page 2.2-9 Wildlife Corridors, the Salvation Army property is clearly and undeniably a habitat linkage and provides an important connection between existing large blocks of open space. The onsite habitat linkage is important for regional movement of wildlife as described earlier, and genetic exchange for plant and animal species, particularly those species reliant on the lower-lying oak woodland, wetland, coastal sage scrub, and grassland habitats. **JB31** (cont'd)

The proposed project and alternatives would impact the majority of habitat within this onsite linkage. The east-west travel route along the tributary creek will be impinged on by improvements to the main road into the facility plus a dramatic increase in number of daily trips on this road. The north-south travel route will be blocked by development wrapping around the lower slopes of the central hill and extending through the broad, wooded valley to the south. The proposed project and Alternatives I and II do not conform with the BMO Design Criteria for Linkages and Corridors, numbers 1 to 10. Therefore, the BMO findings necessary to approve the project cannot be made.

Bonnie Hendricks, M.S. Biology

The author of these comments is a professional biologist of 18 years in San Diego. She was a founding member of the Iron Mountain Conservancy Tracking Team (1995-99) and subsequently a founding member of the Mount Woodson Wildlife Trackers (1999 to present). She has extensive experience with CEQA and MSCP issues, including conformance findings. Her comments on the biology are based on review of the existing technical documents and an independent analysis using current aerial photographs, USGS topographic maps, and regional vegetation mapping. She has an intimate familiarity with the project area due to wildlife tracking and hiking in the region. Years of observation have been accumulated on the following key properties (as well as other smaller parcels): Salvation Army (formerly First Presbyterian Church), MSCP Open Space Preserve (formerly Boulder Oaks Ranch and Boys and Girls Club property), Iron Mountain Open Space, Dos Picos Park, San Vicente Reservoir (City of San Diego), Sycamore Canyon Preserve, Mount Woodson Open Space, Wildwood Ranch, Meador Ranch, former Bud Heller Ranch, holdings of Morgal, Conklin, Klopp and Levin, BLM Open Space, Monte Vista Ranch, Barona Indian Reservation, Silverwood Wildlife Sanctuary, Oak Oasis Park, and Steltzer Park. **JB32**

MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

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AESTHETICS CHAPTER

By Helen Wilson

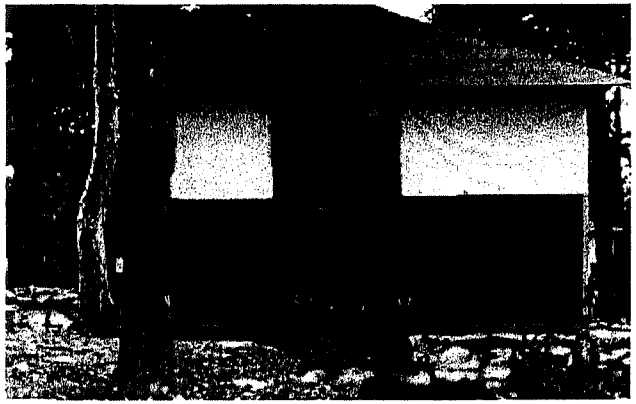
The Salvation Army's Project and Aesthetics

Helen Wilson MFA

Does Scale Matter?

JA1

Yes



1

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

Response to Comment JA1:

The buildings shown in the four pictures are not on the project site, nor are they pictures of the buildings proposed for the project site. As such, the pictures presented by the comment are not an accurate representation of proposed structures within the project site. Photosimulations of proposed camp components are provided in Final EIR Figures 2.5-8, 2.5-12, and 2.5-14. Architectural elevations of the proposed project buildings are provided in Final EIR Figures 2.5-18 through 2.5-21. The photos depicted by the comment show buildings with a different architectural design and building materials that are not proposed for the project. The proposed buildings are depicted in Final EIR Figures 2.5-18 through 2.5-21.

Does Fitting into the Neighborhood Character Matter?

Yes

2

JA1
(cont'd)

Does the amount of people you are with affect your experience?
Yes.

Does being inside effect your experience of nature?
Yes.

Does proximity to your mentor matter?
Yes.

Does over-building instead of multi-tasking your buildings matter?
Yes.

Can you provide a true retreat into nature while also destroying it?
NO.

Salvation Army's Project Objectives 1.2

Though the Salvation Army is involved in a number of charitable activities, **the purpose of the project described herein relates primarily to the Salvation Army's children's and educational service programs.** The Army has been committed for over three-quarters of a century to **providing camping experiences to children** who normally would not be exposed to such opportunities...The camping experience is viewed by the Army as away to **remove at-risk youth from their day to day environment and expose them to a beautiful and natural experience, both physically and intellectually,** where they can explore alternative, positive possibilities and attitudes for themselves and their future.

Project Description 1.1.1

The proposed project is envisioned as a **low-density**, high-quality **camping facility.**

What makes a camp experience?

American Camp Association

The American Camping Association is a community of camp professionals dedicated to enriching the lives of children and adults through the camp experience.

As a leading authority in child development, the ACA **works to preserve, promote, and improve the camp experience**. Our association is committed to helping our members and all camps provide:

* Camp communities committed to a safe, nurturing environment
* Caring, competent **adult role models**
* Healthy, developmentally-appropriate experiences
* **Service to the community and the natural world**
* Opportunities for leadership and **personal growth**
* Discovery, **experiential education**, and learning opportunities
* Excellence and continuous **self-improvement**

JA2

JA3

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA2:
This comment does not raise significant environmental issues for which a response is required.

Response to Comment JA3:
This comment does not raise significant environmental issues. Therefore, no response is necessary. However, the goals of the American Camping Association closely mirror the goals and objectives of the Salvation Army for the desired camping experience at the project site.

The Basics

My questions are questions of scale, interior space verses exterior space, placement, quantity verses quality, and charity verses for-profit.

If your **primary purpose** is to provide a camping experience for at-risk youth in hopes that exposing them to a natural experience will help them explore alternative positive attitudes, then the following aesthetic qualities of their camping experience must remain intact: low-density, direct physical relationship to nature, high quality omni-present mentoring, the exterior space must out-scale the interior space (everything that can be done out of doors should be) and finally, overbuilding, which inevitably destroys the very essence of the experience you seek to share, must be avoided at all costs. JA4

The Big Problem
57,000 s.f. of Visual Impact that does not serve the youth.

It does not matter how pretty of a dress that one puts on a Gorilla
It's still a Gorilla.

Major Use Permit Approval Conditions 1.1.1.2
...blend into the natural environment surrounding camp. JA5

2.5.2 Thresholds of Significance
In accordance with CEQA Appendix G, the county of San Diego General plan, the project would result in a significant impact to Aesthetics if it would result in:
A physical change that is determined to be in substantial conflict with the character of the area.

While the Army made an effort to blend the "Retreat" into the environment, the scale and scope of this portion of the plan is in conflict with the character of the area. Iron Mountain Open Space Preserve borders the property on the west, two large ranches border the property on the northeast and south and Dos Picos County Park borders to the northwest. While some ranch buildings may be similar in scale to the proposed buildings the sheer number of structures and the character of structures are unlike any in the area. JA6 When you look at the architectural drawing of the Retreat Center, human scale is used, but all measurements as to the actual size of the buildings are missing. There is no Architectural drawing of any other structure in this portion of the project. JA7 The altered photos on 2.5-7 are taken from too great a distance and use no human scale references. JA8 The enlarged planning area map six shows more guest structures by double than the project description on 1-3 states. All we know is that at build-out this Conference Center will be approximately 57.000 s.f. (The size of a department store) and serve only 175. JA9 The largest growth for the least

4

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA4:
The Salvation Army has extensive experience operating a children's camp. The Salvation Army Divisional Camp and Retreat has functioned as a camp and retreat center for several decades. The Salvation Army's main objective is to improve the existing camp to serve the needs of the community and youth of the San Diego Region while maintaining the predominantly rural character of the 578-acre project site. Under the Reduced Project Alternative I, 68 percent of the site would remain in open space (see Final EIR Attachment A). The camp will include facilities suitable for accommodating campers and a variety of programs and activities to contribute to the camping experience.

Response to Comment JA5:
Under Reduced Project Alternative I, the retreat center would be in a more central location of the camp. This location would eliminate the significant aesthetic impact associated with the cut/slope for the access road, as well as the significant and unmitigated impacts to biological resources (see Final EIR, section 4.3). The location of the retreat center under Reduced Project Alternative I is a secluded area screened from surrounding views by topography and vegetation. Final EIR Figure 4-1b provides a cross section of views from three points along Mussey Grade Road to the proposed Retreat Center under Reduced Project Alternative I. The retreat center at this location would not be visible from public viewpoints, such as Mussey Grade Road or Iron Mountain Open Space Preserve. Final EIR Figure 2.5-18 depicts the proposed architectural elevation of the proposed Retreat Center. The maximum height of the structure is 30 feet and is shown in the south elevation provided in Final EIR Figure 2.5-18.

The project as a whole, is a low-density, high-quality camping and retreat facility. The camp will include facilities suitable for accommodating campers and a variety of programs and activities to contribute to the camping experience. Development of the project would occur in clusters, thereby minimizing landform alteration and disturbance to natural habitat. The vast majority of the project site will remain undeveloped. The total impact acreage for the Reduced Project Alternative I is 32 percent of the project site, leaving over 395 acres in open space (see Final EIR Attachment A).

Camp buildings and structures will not be readily visible from existing residences surrounding the site, nor will they be visible from Mussey Grade Road. The proposed development concept emphasizes an early California ranch style, which builds on the existing camp theme and exemplifies Ramona's rustic, rural community character. New structures will be limited to one- and two-stories and will range between ten to a

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA5: (cont'd.)

maximum of 30 feet in height. The majority of buildings on site will be single story structures; the housing structures at the retreat component, the Multi-Purpose Building, and the Staff Housing will be two stories. Materials for all buildings will be compatible with the natural surroundings of the site; exterior wall materials may include slump stone masonry, earth-toned concrete masonry units, stone veneer, plaster, brick, or wood. Metals or other highly reflective materials will not be permitted. The project components will complement and integrate with the existing landform and minimize encroachment into hillsides and sensitive biological habitat. Grading for all building pads would generally be limited to existing flat areas of the site, and would be clustered to preserve the natural landform and minimize encroachment into hillsides and sensitive riparian areas.

As discussed in the Final EIR, open space, low-density rural single-family housing, and a commercial horse-breeding ranch surround the project site (see EIR page 1-15). Approximately 1,500 feet north of the project boundary are large lot residences and the commercial Golden Eagle West Horse Breeding Ranch. Residences northeast of the project site are approximately 1,000 feet away, and homes immediately east are approximately 50 to 200 feet from the project boundary.

As discussed in the Final EIR, because of the difference in terrain and the mature vegetation that exists, the project site is not visible to viewers from Mussey Grade Road as shown in Key Observation Point ("KOP") 1 and 2 (Final EIR page 2.5-2 and Figure 2.5-3).

Three visual simulations were also created of key components of the proposed project, including one for the proposed Retreat Center, and two for the multi-purpose facility and mini-theater from adjacent private properties. These photo simulations demonstrate that, where visible from surrounding private properties, the project does not represent development that is out of scale and character of the surrounding community (See Final EIR Figures 2.5-8, 2.5-12 and 2.5-14).

Because the Retreat Center, central dining facility, multi-purpose facility, indoor mini-theater, water tank, and maintenance yard could possibly be visible from public locations and privately owned residences off-site, the EIR provides a visual impact analysis associated with the proposed improvements (see Final EIR pages 2.5-5 through 2.5-7). In each instance, due to the large distances between proposed improvements and views from properties surrounding the site, proposed development would make up

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA5: (cont'd.)
a very small part of the visual landscape because of the large distances involved. Therefore, these improvements would not result in a significant visual impact.

While numerous structures are proposed, these structures are clustered, rather than spread over the entire project site. As a comparison, the current residential designation of the property would allow the site to be developed with between 72 and 91 homes/lots (see Final EIR pages 4-2 and 4-3), and ancillary structures, which is much greater than the total number of structures under the Applicant's Preferred Project. Furthermore, structures would be constructed of materials that blend into the rustic camp environment. Two-story structures are proposed, in part, to allow more of the project site to remain in open space. Furthermore, two-story structures would also be allowed under current zoning regulations.

Response to Comment JA6:
As discussed in DEIR response to comment JA5, the retreat center would be moved to a different location under Reduced Project Alternative I. The proposed kitchen portion of the retreat center would be a building 50 feet long by 50 feet wide. A 30-foot wide breezeway connects the kitchen with the dining room. The dining room building would be 70 feet long by 70 feet wide. The total square footage of the retreat center kitchen and dining room is 7,400 square feet. The guest cabins would be 135 feet long by 45 feet wide (approximately 6,000 square feet each).

Final EIR Figure 2.5-18 depicts the proposed architectural elevation of the proposed Retreat Center. The maximum height of the structure is 30 feet and is shown in the south elevation provided in Final EIR Figure 2.5-18. The architectural drawing is provided for the Retreat Center, as the Retreat Center will be the largest structure and only structure in this portion of the camp that is potentially visible from off-site locations See DEIR response to comment JA5.

Response to Comment JA7:
The visual simulations provided in the Final EIR reflect the distances to the proposed structures from surrounding public and private locations from which these project components may be visible, and accurately represent the views onto the project site.

Response to Comment JA8:
The comment is counting one guest structure as two guest structures due to the separation of the buildings by a walkway. However, Final EIR Figure 1-11 depicts five

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA8: (cont'd.)
guest houses, as indicated in the Final EIR project description, page 1-3. Each guest house includes two buildings joined by a common entry area. Therefore, it appears that there are 10 housing structures, as noted by the comment. The visual simulation of this area as provided in Final EIR is an accurate representation of proposed project development for this area (See Figure 2.5-8).

Response to Comment JA9:
The size of the facilities is appropriate to adequately serve the proposed camp population. The proposed project is referred to as the Salvation Army Divisional Camp and Retreat, and intended uses of the camp are described in Chapter 1.0 of the Final EIR. The facilities that are proposed are necessary to meet the basic objectives of the proposed project.

amount of people, **none of which will be at-risk children.** The Army often refers to the whole project as a camp. **This is not a camp.** **JA9 (cont'd)**

The Retreat Center is really a for-profit Conference Center.

These ten two story Hotel Structures, two Tennis Courts, Pool, indoor Conference Center, Dinning Hall plus Activity Building could be found at any convention center in downtown San Diego. The countryside only serves as a 3-D mural. This Conference Center does not follow the Army's own guidelines as stated in objective 12. Yet the Army states... **JA10**

> 1.12: Additionally, due to current limitations of the facilities during summer months, the **Army cannot rent the site or allow others Salvation Army groups to use the camp as the camp is used at full capacity for youth camps.** This is problematic for two reasons. First the Salvation Army **loses revenue** for providing scholarships to underwrite the expense of providing the youth camp. **Rental income** during the summer months assists the Salvation Army in their ability to provide camping opportunities to underprivileged children. Secondly, many organizations, including the Salvation Army itself, like to use the facility during the summer. **However, this is not currently possible since the existing camp is fully utilized by children's camp.**

They are asking to have their cake and eat it too. They can't use the camp for other things, because they are using it for what they said they wanted to use it for, a camp. As for losing revenue, you cannot lose something you never had. The aesthetics of the neighborhood are being altered so that the army can earn money on site to do their charity work. In the past these two operations were separate. The simple desire to help the children does not automatically lead to the right to destroy other portions of the "camp" to do so. **Earn money off site.**

> 4. Provide a retreat center in **a camp-like setting** with **an atmosphere conducive to personal growth** that is physically distinct and isolated from the remainder of the camp facilities;

There is nothing camp-like about this facility. Because of the amount of interior space and the scale, the retreat center is not conducive to personal growth via relationship to the natural environment. One cannot hope to be altered by an experience that one is isolated from. No physical contact to the surrounding natural environment could actually have the opposite effect, one of apathy, no different than when viewing nature on a T.V. set.

ACA Values

> As an organization we value the world, the people who live in it, and the contribution each individual can make. **These are not separate values,** but concentric circles. The values that are important to us as an organization are the same as those we strive to instill in the children and adults we guide.

5

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA10:

Similar amenities to those referenced by the comment (tennis courts, pool, activity building, etc.) can be found at camps throughout the Country, and the provision of these facilities does not make the project a commercial venture. For example, the YMCA Camp Marston near Julian has a swimming pool, basketball courts, an activity building, and other amenities, and Camp Cuyamaca has hardcourt play areas (including basketball courts). Moreover, the existing Salvation Army Camp and Retreat Center includes recreational facilities, such as a pool, basketball courts and tennis courts. Please also see DEIR response to comment JA5 regarding aesthetics.

Other problems Areas

Area 4, The Administration Cluster

Over building…

As with many sections of this camp there is no architectural drawing of this cluster, we only are given the build-out size 6000 sq. It includes a needed infirmary, and a Canteen. Why not incorporate the canteen into the dining facility? Why so much administration for a low-density camp? **JA11**

Planning Area 3

When taken as a whole it has a large Visual Impact.

The visual Simulation for this area is poor. It is taken from too great of a distance and has no human reference. This area will not be a 5 x 7 photograph. The Architectural drawings have no human reference point and no measurements. Some buildings (classroom) have no architectural drawing. How big are these buildings? **JA12**

Approximately 35,000 s.f. for Nature Study Camp
Classroom building, concrete outdoor meeting area, nine cabins, restroom and shower facility
Capacity 198
Approximately 19,500 s.f. Multi-purpose building
Capacity 600
Approximately 2.500 s.f. indoor mini-theater
Capacity 125
Approximately 21,000 s.f. Central Dining Facility
Plus cook housing
Capacity 600
Total: 78,000 s.f. of Visual Impact

The Theater

Skits and plays in the open are one of the cornerstones of the camping experience. In fact Theater started in the open. Why the need for an enclosed theater? This is a missed opportunity to pass down history while exposing children to the real world. If it rains you can double task one of the other many buildings. This could be **experiential education** at it's best. **JA13**

The Nature Study Camp

The best way to study nature is in Nature. Why do you need a concrete meeting area? Let them touch dirt. With no Architectural drawing of these structures we have no idea of the scale beyond the total square footage. Can you multi-task another building when the kids need a classroom? Or perhaps this is the perfect group to sleep under the stars, with one central building to move into, that doubles as a weather reprieve and a **JA14**

6

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA11:
Buildings within Planning Area Four, as depicted in Final EIR Figure 1-9, will comprise a total of 6,000 square feet and will be one- to two-stories in height. These buildings range in size. The canteen and clinic will be 40 feet by 40 feet. The administration and shower will be 50 feet by 50 feet. Architectural drawings have been provided for the largest and main buildings of the project that were determined to have a potential to be visible from off-site locations. As provided in DEIR response to comment JA5, the proposed development concept emphasize an early California ranch style, which builds on the existing camp theme and exemplifies Ramona's rustic, rural community character. The structures referenced by the comment will be limited to one-story and will not be visible from off-site locations. As with other cluster components of the project, materials for all buildings will be compatible with the natural surroundings of the site; exterior wall materials may include slump stone masonry, earth-toned concrete masonry units, stone veneer, plaster, brick, or wood. Metals or other highly reflective materials will not be permitted. The administrative facilities proposed as part of the camp are needed to support the proposed camp uses. The canteen is a small store and is located in the center of the camp near the administrative facilities where it will be most accessible.

Response to Comment JA12:
Final EIR Figure 2.5-14 provides a visual simulation of the proposed project development in Planning Area 3. The proposed Multi-purpose building would be 125 feet long by 70 feet wide. The proposed indoor movie theater is 40 feet wide and 65 feet long at its longest point. The proposed central dining facility is comprised of the following three buildings: the dining room, which would be 75 feet long by 50 feet wide, the kitchen, which would be 145 feet long by 135 wide, and the cooking area, which would be 35 feet long by 25 feet wide. The classroom building would be 50 feet by 50 feet and the cabins would be 75 feet by 75 feet.

The visual simulation of Planning Area 3, as provided in Final EIR, is an accurate representation of project development proposed for this area. The visual simulations provided in the Final EIR reflect the distances to the proposed structures from surrounding public and private locations from which these project components may be visible, and accurately represent the views onto the project site. Due to the distances (in most cases over 1,000 feet) between proposed improvements and views from properties surrounding the site, proposed development would make up a very small part of the visual landscape, and distances are too far to render these improvements as a substantial visual change to the area.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA13:

The facilities that are proposed have been identified by the applicant as necessary to meet the basic objectives of the proposed project. Both indoor and outdoor theater related activities will occur at the camp, and the provision of an indoor theater allows more versatility for providing programs at the camp.

Response to Comment JA14:

As indicated in the Final EIR and DEIR response to comment JA5, only the housing structures at the retreat component, the Multi-Purpose Building, and the Staff Housing will be two stories. No structures would exceed 30 feet in height. Paved surfaces, including a proposed meeting area, are an additional camp amenity that offers flexibility as to the type of activities that can be provided to campers, such as music activities. Many of the buildings will serve multiple purposes and would be "multi-tasked" as suggested by the comment. For example, they could be used for instructional-type of activities on one day and then set up for social activities the next day. The facilities proposed are the facilities envisioned by the project proponent to accommodate the various activities contemplated at the camp.

classroom. 198 youth studying nature together does not seem low density. Destroying nature in order to study it shows a complete lack of understanding of camping principals **"service to the community and the natural world."** JA14 (cont'd)

Dining Facility

What are you using a 21,000 s.f. building facility for when dinner is not being served? Most camps use this as their lodge; the dinning Hall is the Multi purpose building. If you are serving so many people that the facility is always serving food this is not a low-density, high-quality camping facility. Low density is the key to making this camp experience work for these children. JA15

Multi-Purpose Building

Just another example of over building. Aesthetically how many big buildings can you put in a camp without destroying the feeling of camping? Multi-task some of your buildings. JA16

Planning Area One

Staff housing is too far away from the camping components.

Camp staff, i.e. counselors, should be sleeping in the same area as the children; otherwise the children are left unattended at night. Proximity to your mentor matters. This area is too far from the camping areas. This is a misplaced, massive over-build and will promote isolation of staff from campers, **not** caring, competent adult role models. These are two story buildings and there are no architectural drawings, no scale other than max build-out of 20,000 s.f. JA17

In Conclusion

This is not low-density project. This is a massive overbuild, with copious amounts of interior space, no attempt to multi task buildings with little relationship to traditional camping. This project does not meet the Salvation Army's stated primary objective. The Plan shows almost no true measurements and no true scale. All visual Simulations lack scale and underplay the visual impact of the build-out. Just because the Army provides free camping to at-risk youth, it does not follow that they have a right to turn this camp into a for-profit Conference Center/ Resort. JA18

Putting 120,800 s.f. of buildings and 748 people into this rural area would negatively impact it aesthetically, forever.

7

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

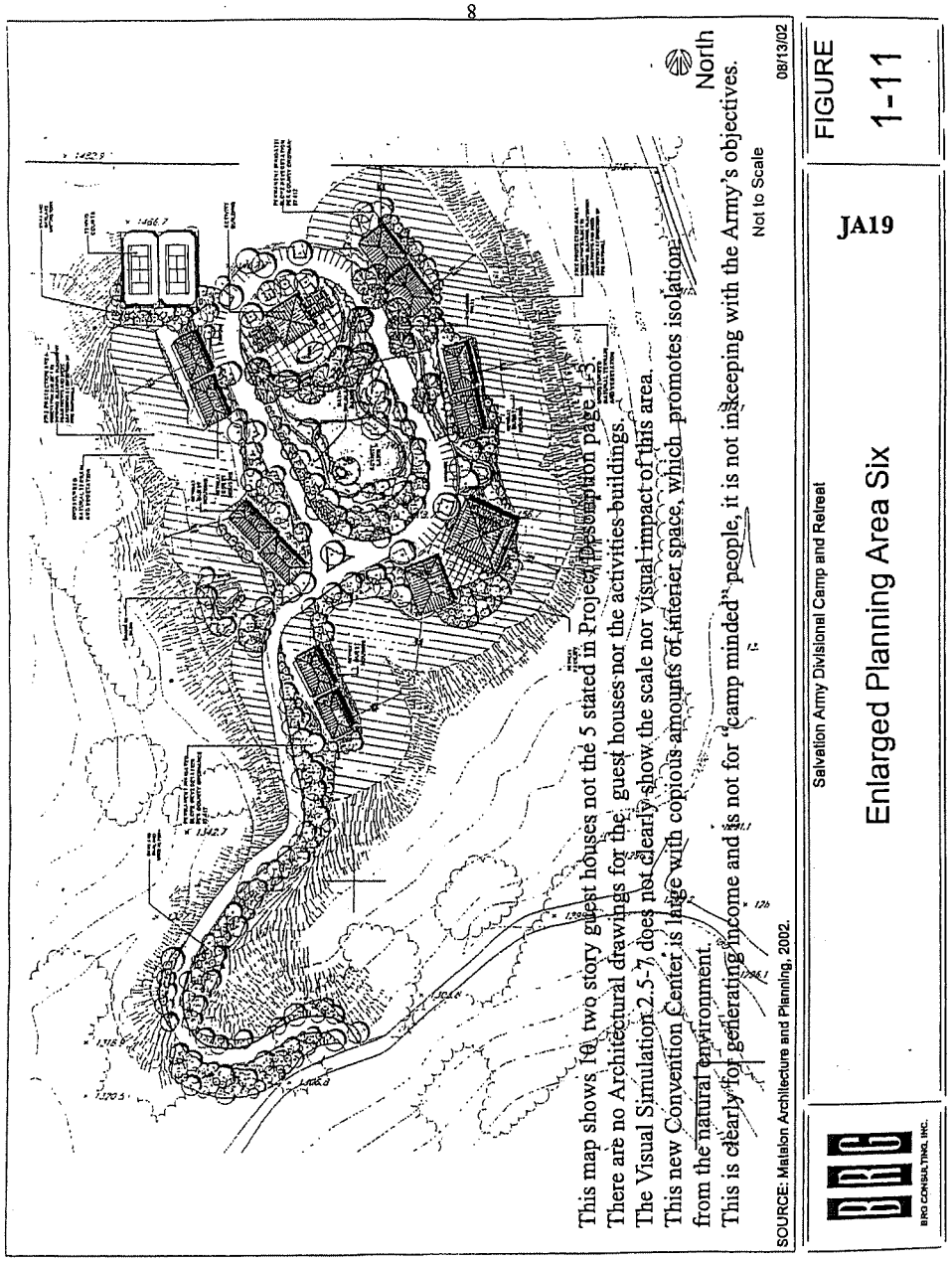
Response to Comment JA15:
This comment does not raise a significant environmental issue for which a response is required. Nonetheless, the proposed dining hall would be used to serve meals throughout the day in support of the maximum camp population.

Response to Comment JA16:
Camping can include many activities, both outdoor and indoor. The facilities proposed will accommodate a variety of camping activities that will contribute to the overall camping experience. There is no set limit on the number of buildings that can be located at a camp site in order to still be considered a camp. Also, the number of buildings proposed is adequate to accommodate the camp population. Many of the buildings will serve multiple purposes as suggested by the comment.

Response to Comment JA17:
Most of the comment does not raise a significant environmental issue for which a response is required. Nonetheless, certain camp counselors will sleep in close proximity to children attending the camp and will always provide adequate supervision. Other camp staff who are not assigned to a group of campers, would sleep in the designated staff housing.

The proposed staff housing is comprised of four individual buildings. Three of the four buildings will be two-stories. Each of these buildings will be 90 feet long by 35 feet wide and approximately 5,000 square feet in size. The fourth staff housing building will be one-story and 90 feet long by 35 feet wide and 2,500 square feet in size.

Response to Comment JA18:
Please see DEIR responses to comments JA1 through JA17.

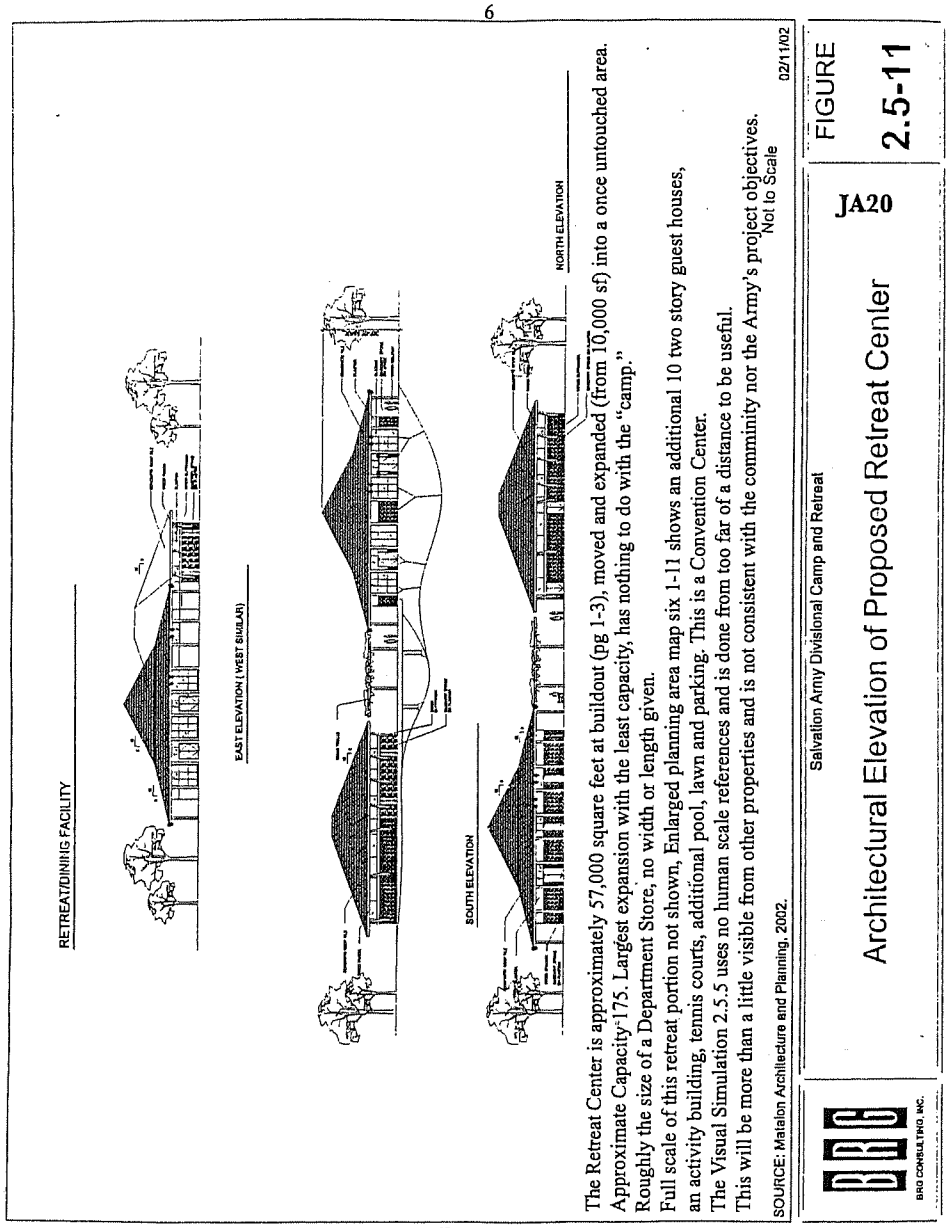


RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA19 (Comments on Figure 1-11):

Please see DEIR responses to comments JA8 and JA13. Although no architectural elevation of these structures is provided, as with other cluster components of the project, materials for all buildings will be compatible with the natural surroundings of the site; exterior wall materials may include slump stone masonry, earth-toned concrete masonry units, stone veneer, plaster, brick, or wood. No metal or other highly reflective materials will be used on the exterior of the buildings.



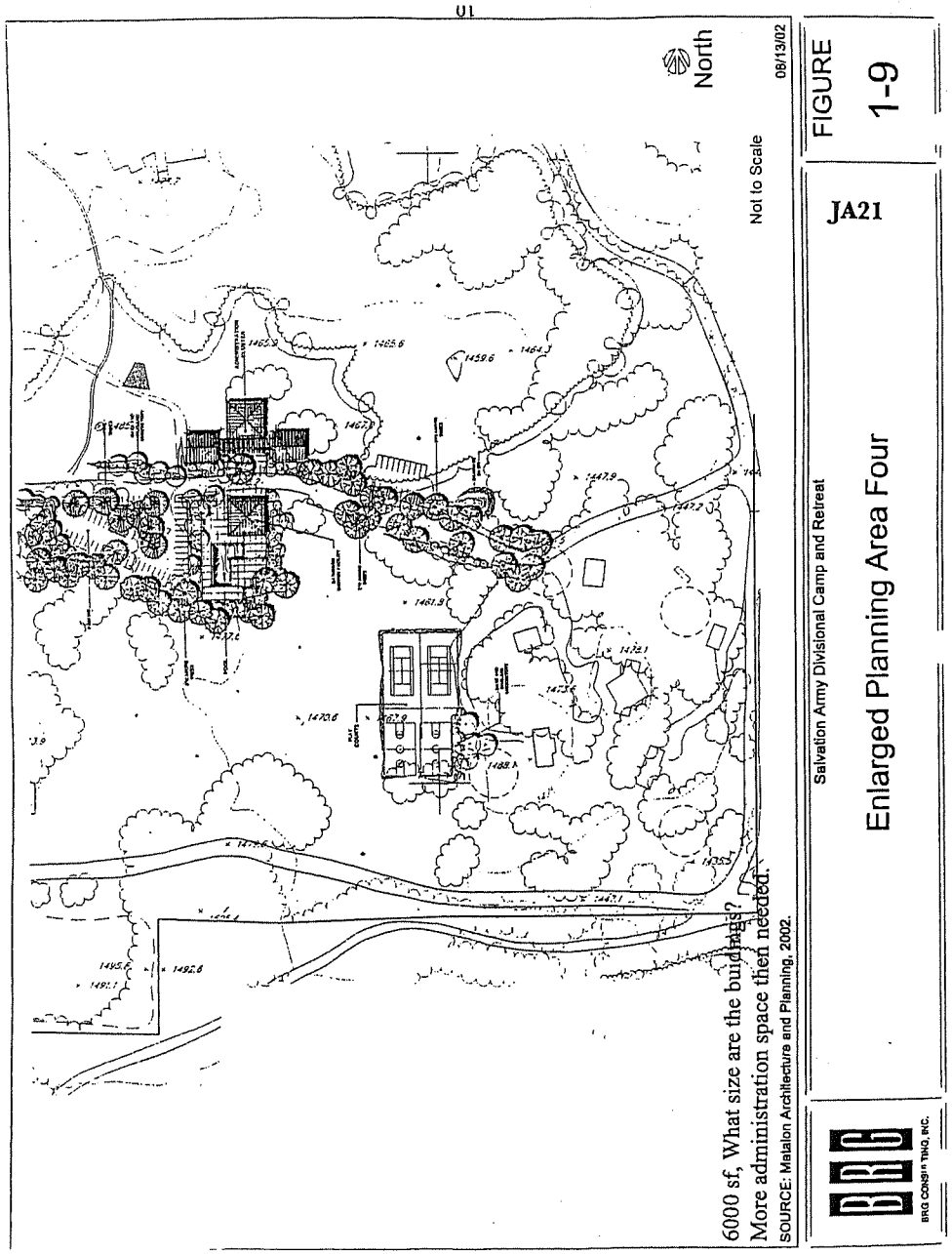
2.5-23

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA20 (Comments on Figure 2.5-11):

The comments provided on this figure have been addressed in preceding DEIR responses to comments JA5, JA6 and JA7. The total square footage of the retreat center kitchen and dining room is 7,400 square feet. By way of comparison, a typical major department store is approximately 100,000 square feet in size. Therefore, the proposed retreat center is less than 1/10th the size of major department store.

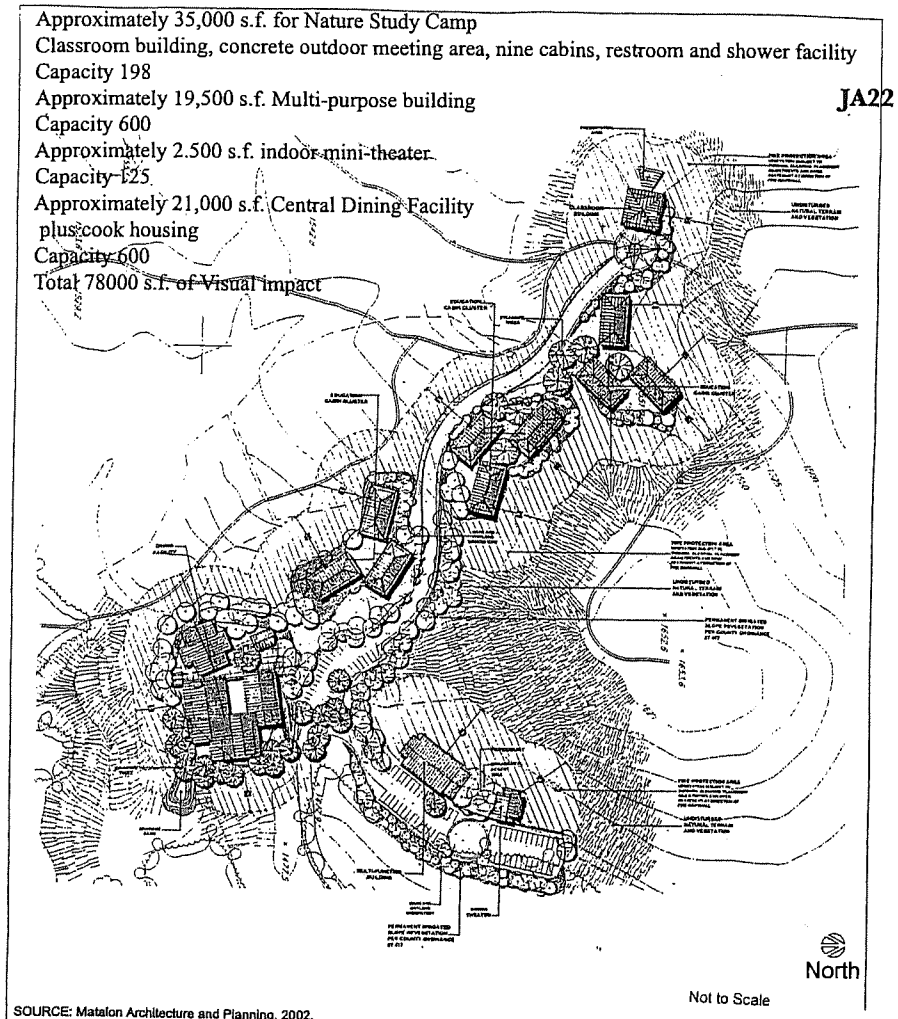


RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA21 (Comments on Figure 1-9):

The comments provided on this figure have been addressed in DEIR response to comment JA11. Administrative facilities will not exceed two stories or 30 feet in height. The Administration building would be 45 feet long by 45 feet wide, and a total of 2,025 square feet. Both the canteen and clinic buildings would be 40 feet by 40 feet (1,600 square feet each). The proposed pool house and shower area would be 50 feet by 50 feet.



SOURCE: Matalon Architecture and Planning, 2002.

BRG CONSULTING, INC.

Salvation Army Divisonal Camp and Retreat

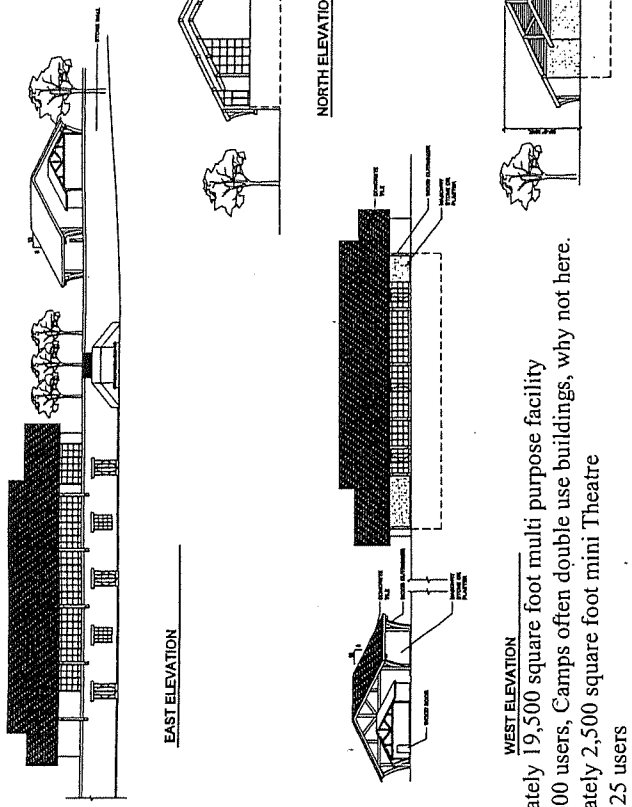
Enlarged Planning Area Three

FIGURE 1-8

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA22 (Comments on Figure 1-8):
Please see DEIR response to comment JA12.

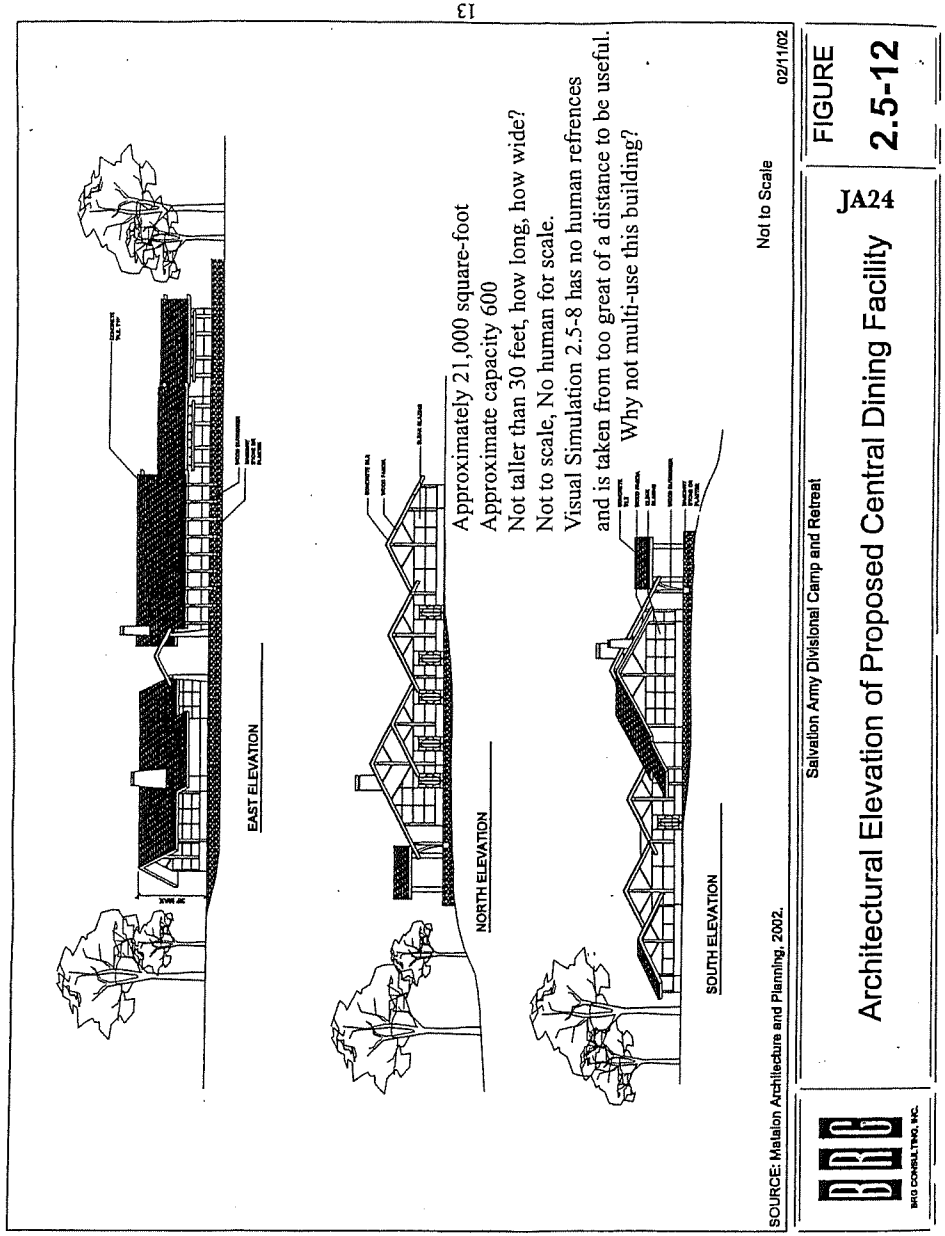


RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA23 (Comments on Figure 2.5-14):

The comments provided on this figure have been addressed in DEIR response to comment JA12.



13

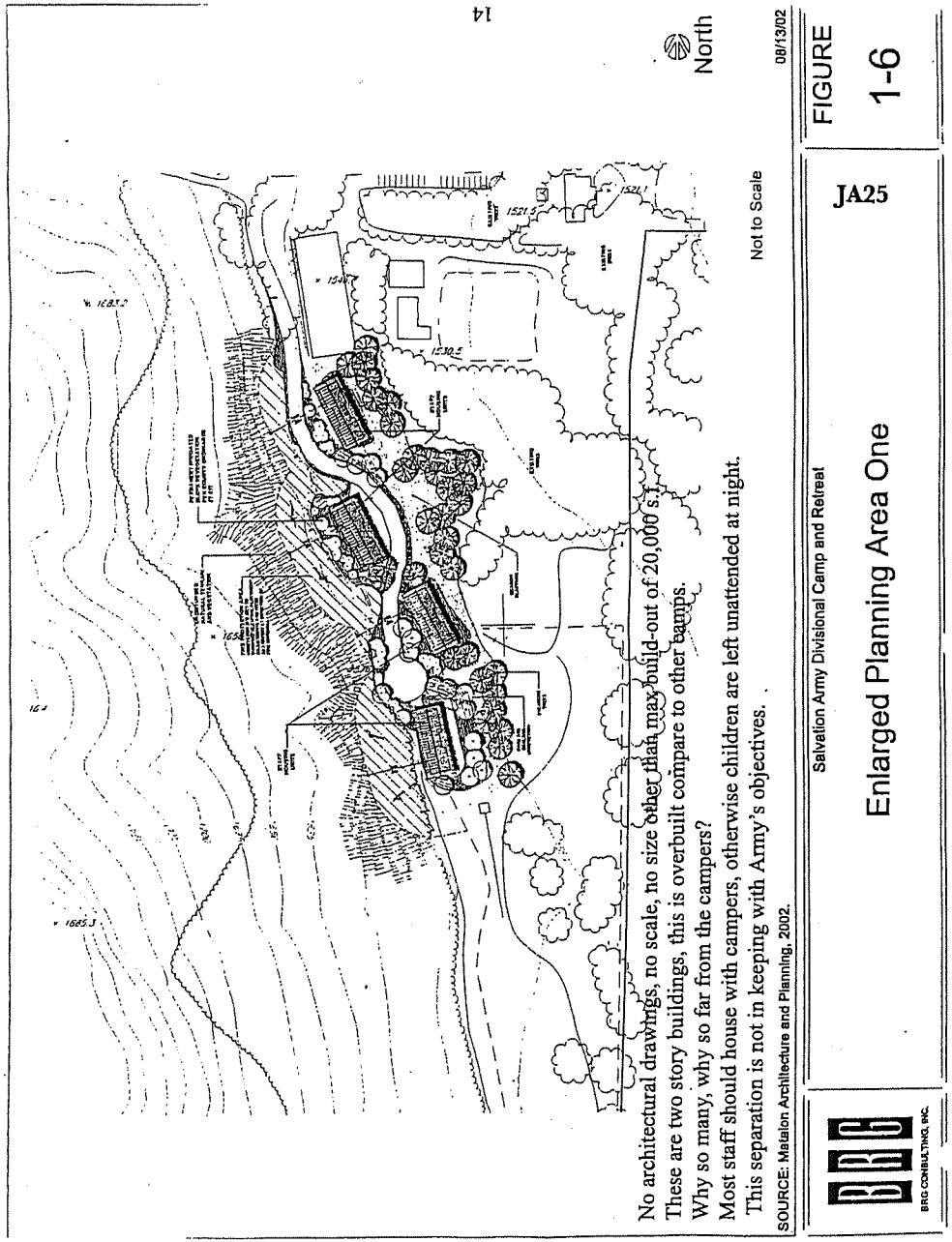
2.5-24

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA24 (Comments on Figure 2.5-12):

The comments provided on this figure have been addressed in DEIR response to comment JA12.



RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA25 (Comments on Figure 1-6):

The comments provided on this figure have been addressed in DEIR response to comment JA17.

Helen Wilson was born in San Diego County. She has lived in Ramona for 30 years. Ms. Wilson is an Internationally Exhibited Artist with a Masters of Fine Arts from The San Francisco Art Institute and Bachelors in English from The United States International University, which she attended in San Diego and Bushey, England. She also attended the Free Academy of the Arts in Den Haag, The Netherlands. In her youth she spent many summers at camps that her father ran. Helen was raised around camping issues. Her father, Don Wilson, was a member of the Mayors Council on Youth, Founder of the Community Campership Council, Staff Director of Camping Boy Scouts, Camp Development Director for Girl Scouts and Director of the National Board American Camp Association. As an adult Helen has worked in camps as a Counselor, Unit Leader and as a paid Consultant. **JA26**

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, AESTHETICS CHAPTER (JA SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JA26:

Biography of Author, response not required.

Comment
Letter JCR

MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

P.O. Box 683
Ramona, CA 92065
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Steering Committee:
Diane Conklin, Spokesperson
Carol Levin, Treasurer
Bruce Meador, Member
Donna Schneider, Member
Joseph Mitchell, Member

CULTURAL CHAPTER

By Richard Carrico

Cultural Resources

by Richard Carrico

My one concern is that the consultant and/or the County should consult with the California Native American Heritage Commission and local Kumeyaay people to determine if sacred or sensitive locales are within the project site and to determine if they agree with the findings of the site testing and mitigation measures for the one significant site. JCR1

Richard L. Carrico
Mooney Jones & Stokes
Cultural Resources
9903 Buisinesspark Avenue
San Diego, CA 92131

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, CULTURAL RESOURCES CHAPTER (JCR SERIES) DATED MARCH 28, 2005

Response to Comment JCR1:
The County has corresponded with the Native American tribes identified by the comment. Specifically, a consultation letter was sent to the Native American tribes listed below and was followed up by telephone. The results of this consultation effort are summarized in the table below.

NATIVE AMERICAN CONSULTATION

Name	Affiliation	Date Contacted	Results
Rhonda Welsch-Scalco	Barona Group of the Capitan Grande	6/3/05	Directed call to Lucille Richard-EPA Specialist
David Baron	Barona Group of the Capitan Grande	6/3/05	Did not call per Lucile Richard's information
Lucille Richard (EPA Specialist)	Barona Group of the Capitan Grande	6/3/05	Stated that all letters received for Barona Group are forwarded to Steve Banegas
Jim Velasques	Coastal Gabrieleno Diegueno	6/3/05	Phone number has been disconnected
Rebecca Osuna	Inaja Bank of Mission Indians	6/3/05	Left Voicemail
Leon Acevedo	Jamul Indian Village	6/3/05	Left voicemail
Ron Christman	Kumeyaay Cultural Historic Committee	6/3/05	No answer
Steve Banegas	Kumeyaay Cultural Repatriation Committee	6/3/05	Left Voicemail
Allen E. Lawson	San Pasqual Band of Mission Indians	6/3/05	Left voicemail
Danny Tucker	Sycuan Band of Mission Indians	6/3/05	Left voicemail
Anthony Pico	Viejas Band of Mission Indians	6/3/05	Left voicemail

Source: BRG Consulting, Inc., 2005.

Comment
Letter JH

MUSSEY GRADE ROAD ALLIANCE

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HYDROLOGY CHAPTER

By Anonymous

EIR Air and Water Quality

Air Quality

1. Air quality section: no technical report was prepared, and as far as I can tell, no quantified discussion of construction equipment lists (i.e., types of equipment/vehicles) and extent of operation (i.e., hours/day and number of days) is provided in the project description. Accordingly, the conclusion on Page 6-12 that "[t]he project would use less equipment than used in the example scenario above..." (from EPA 1995) is speculative. I would suggest that a project-specific air quality analysis (including information on equipment/vehicles as noted above) is necessary to identify the quantitative effects of project construction and determine if such emissions are within the County criteria levels shown in Table 6-1. As it stands, the analysis is merely a qualitative deduction with no real numerical data provided for the proposed project. JH1

Hydrology/Water Quality

1. On Page S-2 (second dashed item) of the EIR, a convenience store "canteen" is listed as a component of the proposed project. No discussion of this facility is included in the EIR hydrology/water quality section or the SWMP, and it's impossible to determine if this "canteen" would include any uses which might represent potential water quality impacts (e.g., parking areas, loading docks, hazardous material use/storage, trash receptacles, etc.). Also, an infirmary is listed, with no discussion of whether this facility might include uses which represent potential water quality impacts (e.g., medical waste). JH2

2. The 5th dashed item on Page S-2 (and related text on Page 1-4) of the EIR lists a "standard septic system and leach fields throughout the site" as a project component. The text on Page 1-4 notes that a "separate analysis and report has been provided to the Department of Environmental Health [Vinje and Middleton Engineering, inc. 2001), covering detailed percolation tests and calculations of the proposed system." Neither this report nor any analysis derived from this report, however, is included in the EIR or SWMP. Without such information, it is impossible to determine if the system will function properly, or if any related water quality impacts (i.e., to groundwater) might occur. Also, the fact that this report was prepared during (or prior to) 2001 begs the question of what project design it was intended to accommodate, and whether any subsequent changes to the project might merit additional analysis of the septic system design, location and capacity. In a related question, I would ask if disturbance associated with all of the proposed leach fields (12 acres, per Page 6-3 of the EIR), leach lines, seepage pit, etc., has been considered in the evaluation of potential impacts to issues including biological and cultural resources. Again, it's difficult to tell when the septic facilities are not shown or more than briefly mentioned in the EIR. JH3

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

Response to Comment JH1:

The County does not concur with this comment. The most substantial emissions associated with construction activities occur from earthwork (grading). With respect to the proposed project, relatively minimal earthwork would be required to prepare building sites. Additionally, all construction activities would be phased over time, as funding becomes available to construct new facilities on the camp in accordance with the proposed master plan. The Final EIR provides a quantification of emissions associated with the use of five scrapers, a bulldozer, and a grader, and indicates that the use of this equipment would fall far below the County screening criteria (Table 6-1 as referenced in the EIR). Because of the limited earthwork activity required and the phased construction of facilities, the simultaneous use of each of the equipment listed above is not expected, therefore, construction emissions would remain less than significant.

The largest building proposed for construction on the project site is 21,000 square feet. In support of the EIR conclusion that the proposed project would not result in a significant air quality impact, the South Coast Air Quality Management District URBEMIS (for Windows 2002) air quality model was conducted assuming a maximum building square footage of 80,000 square feet, which is 59,000 square feet larger than any of the proposed buildings.

The model assumed a building site size of 9.2 acres, a building size of 80,000 square feet, 2.3 acres of soil disturbance per day, use of the type and number of grading equipment identified above, and the default building construction equipment that is applied to a project of this size by URBEMIS (2 concrete/industrial saws, 4 other pieces of equipment, and 2 rough terrain forklifts).

The results of the URBEMIS air quality model indicate that air pollutant emissions for carbon monoxide (CO), reactive organic compounds (ROC), nitrogen dioxide (NOx), fine particulate matter (PM10) or sulfur dioxide (SOx) would not exceed emission thresholds for these criteria pollutants (see URBEMIS modeling worksheets provided in Appendix F of this responses to comments).

For the modeled development scenario, the amount of ROC emitted during application of architectural coatings was the highest (134.90 pounds/day) relative to its particular significance threshold (137 pounds/day). The largest building proposed by the project is 59,000 square feet smaller than the building analyzed in the URBEMIS model; therefore, development of the proposed buildings would not exceed the pounds/day threshold for ROC nor any of the other criteria pollutants.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH2:

The County does not concur that all potential uses have not been adequately evaluated within the Final EIR and associated SWMP. The canteen use is a very small camp store that would provide basic provisions for camp users. No additional parking, loading, hazardous materials areas, etc. are associated with this use. The infirmary would involve application of first aid to camp visitors with relatively minor (e.g., headaches, cuts and scrapes, sunburn, insect bites) ailments, and would not involve the generation of hazardous medical wastes. The operation of either of these components of the project would not involve uses that represent potential water quality impacts. There are no additional impacts associated with these uses. However, in order to be consistent, the Final EIR and SWMP have been revised. The Canteen and infirmary have been included in the SWMP. SWMP discussion of pollutants of concern now references SUSMP Tables 3.1, 4.2 and 4.3. Table 3.1 is provided in SWMP Section 2.3 and Tables 4.2 and 4.3 are provided in SWMP Section 5.4.

Response to Comment JH3:

Please see DEIR responses to comments G3, I12, I19, J15.

3. Page 1-4 (3rd paragraph) of the EIR states that "infiltration basins...will be used to prevent adverse hydrology/water quality impacts." There are numerous other references to the use of such basins in the EIR (with a few noted below), with no proposed use of infiltration basins identified in the SWMP. As discussed below, detention basins are proposed, but these are entirely different features than infiltration basins. Also, if it is subsequently determined that infiltration basins are proposed for the site, associated potential impacts to groundwater should be evaluated (with no such evaluation currently provided). JH4

4. Page 1-6 (1st paragraph) of the EIR states that "All runoff will be filtered through bio swales or other mechanisms approved by the County...". On Page 6-7 (and in the SWMP), however, the EIR concludes that "In many areas, the swales may be steep due to topography constraints. These swales will need to be heavily planted to protect against erosion. As a result of these steeper slopes; however, the water quality treatment will be minimal." Accordingly, as discussed in more detail below, one of the two principal treatment BMPs identified in the SWMP and EIR is identified (with the exception of Area 5) to provide only minimal water quality treatment. JH5

5. Page 1-6 (3rd paragraph) of the EIR, states that "The project, at build-out, will result in 3.9 acres...[of] total encroachment into steep [greater than 25%] slopes." On Page 6-4 (2nd bullet under post-construction BMPs), however, the analysis states that "Steep slopes...have been avoided in the site plan to minimize any potential erosion. Obviously both statements cannot be true, and I would venture that nearly 4 acres of impact to steep slopes represents neither avoidance nor avoidance to the maximum extent practicable (MEP). JH6

6. Page 1-8 (5th bullet) of the EIR and various locations in the SWMP (e.g., Table 4) note that herbicides will be used on the project site. Yet Page 1-10 states that "Since the project does not propose agricultural use or to keep livestock on-site, potential pollutants from pesticides...shall not occur. While this reference is intended for pesticides related to animal activities (e.g., to control flies), no discussion of the herbicide use assumed in the SWMP is included in this discussion of "Hazards and Hazardous Materials", with this omission misleading to the reader and inaccurate with respect to assumed chemical uses on-site per the SWMP. JH7

7. Page 1-10 (last paragraph) of the EIR identifies (among other BMPs) the use of infiltration basins to "minimize water quality impacts", although as noted above nosuch features are proposed (or identified in the SWMP). This same discussion also notes that the identified BMPs ("Project features") will allow "...runoff to permeate through the soil below." No discussion of potential impacts to groundwater quality from such runoff permeation is provided in Section 6.1.3.3 (Page 6-11), however, with that discussion concluding that "Implementation of the Best Management Practices outlined in the Stormwater Management and Maintenance Plan (Appendix G) prepared for the project in compliance with the WPO will reduce impacts to Hydrology/Water Quality to less than significant." In fact, the SWMP includes no discussion of potential impacts to groundwater. JH8

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH4:
The proposed project proposes detention basins, vegetated swales, and an infiltration basin as treatment control BMPs. The Final EIR page 1-5 has been revised as follows:

The existing camp is serviced by a standard septic system with leach fields. The expanded camp will also be serviced by a standard septic system with leach fields. Detention basins, vegetated swales, and an infiltration basin/rain garden will be used as Treatment Control, Site Design, and Low Impact Development Best Management Practices (BMPs) to prevent adverse hydrology/water quality impacts.

The SWMP distinguishes between detention basins and the infiltration basin. Potential impacts to groundwater are evaluated in accordance with SUSMP requirements in Attachment 9 of the SWMP.

Response to Comment JH5:
The comment is correct in that the EIR states that the water quality treatment of vegetated swales in areas of steep slopes will be minimal. However, as discussed in the Final EIR, with the exception of Area 5, vegetated swales are not the primary BMP, detention basins are. Vegetated swales will provide an additional pre-treatment and treatment BMP. In Area 5, vegetation swales are proposed as the primary BMP; however, these will not be located in steep slope areas and the treatment capability in the Area 5 is adequate. Please see response to comment G1.

The SWMP includes Tables 4.2 and 4.3 of the SUSMP. In locations where vegetated swales are too steep, extended detention basins are the primary Treatment Control BMP. In Area 5, the slope of the vegetated swale is less steep and removal efficiencies are anticipated to be in accordance with Tables 4.2 and 4.3 of the SUSMP. Additionally, in Area 2 an infiltration basin/rain garden is a proposed Treatment Control BMP.

Per Table 4.3 of the SUSMP, Sediment and Trash and Debris are classified as "Coarse Sediment and Trash". Per Table 4.2 of the SUSMP, Settling Basins (Dry Ponds), Infiltration Facilities or Practices, and High Rate Biofilters have a "High" removal efficiency for Coarse Sediment and Trash. Also per Table 4.3 of the SUSMP, nutrients, heavy metals, organic compounds, oxygen demanding substances, bacteria, oil & grease, and pesticides are classified as "Pollutants that tend to associate with fine particles during treatment". For this classification of pollutant, Table 4.2 of the SUSMP indicates that Settling Basins and Infiltration Practices have a "High" removal efficiency and High Rate Biofilters have a "Medium" removal efficiency. Nutrients are also classified as "Pollutants

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH5: (cont'd.)
that tend to be dissolved following treatment" in Table 4.2. Table 4.3 indicates that for these types of pollutants, Settling Basins and High Rate Biofilters provide a "Low" removal efficiency and Infiltration Facilities provide a "High" removal efficiency.

The SUSMP states that Treatment Control BMPs with high or medium pollutant removal efficiency shall be selected. The SUSMP also states that source control BMPs may reduce the amount of treatment control BMPs needed. All pollutants of concern for the project are treated by Treatment Control BMPs with at least a medium pollutant removal efficiency except for nutrients which receive both a high and a low pollutant removal efficiency from the selected Treatment Control BMPs. The project also proposes Source Control BMPs to address nutrients (limited use of fertilizers, use of native species, and use of phosphate-free fertilizer) in a manner that reduces the need for pollutant removal by Treatment Control BMPs. Therefore, the project has selected Treatment Control and Source Control BMPs in a manner that addresses project pollutants of concern in a manner that is consistent with SUSMP standards and requirements.

Response to Comment JH6:
Avoidance of steep slopes to the extent feasible was a design consideration for many aspects of the proposed project, including water quality considerations. However, the County does acknowledge that steep slopes will not be entirely avoided, as indicated on EIR page 1-6. As such, EIR page 6-7, second bullet has been revised to read:

- Steep slopes and high erosion areas have been avoided *to the extent feasible* in the site plan to minimize any potential erosion.

Avoidance of steep slopes is one BMP listed among numerous other BMPs that will be implemented for the proposed project. SWMP has been revised to include revision to steep slope reference.

Response to Comment JH7:
The County does not concur with this comment. The EIR does not state that herbicides will be used on the project site; the EIR states that herbicides may be used on the site. Additionally, the SWMP identifies weed killer (a herbicide) as a potential pollutant. If herbicides are used they will be used in accordance with standard application practices, and applied by a licensed pesticide applicator, and water quality is not

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH7: (cont'd.)
anticipated to be affected. However, the use of pesticides is not anticipated. See response to comment G1.

Response to Comment JH8:
Please see DEIR response to comment JH4. The detention basins and vegetated swales will remove pollutants through settlement and filtration, are not infiltration BMPs and will not impact groundwater. The project does propose one infiltration basin/rain garden in Area 2 that will remove pollutants through infiltration. SWMP Attachment 9 evaluates impact of the infiltration basin on groundwater quality in accordance with the SUSMP.

8. Once again, Page 3-6 of the EIR (2nd paragraph in Section 3.1.9) identifies infiltration basins as a BMP, with no such features identified in the SWMP. JH9

9. Again, Page 6-3 (1st paragraph) of the EIR identifies the proposed septic system and concludes that associated impacts would not be significant, although no detail on the previously referenced technical report or potential impacts to groundwater quality is provided. JH10

10. Page 6-4 of the EIR gives a (very) brief outline of potential construction BMPs, all of which are derived from the Caltrans Storm Water Quality Handbook (per the discussion in the SWMP). While this is not technically inaccurate, the EIR, as a public document, should provide background information on construction-related regulatory requirements (e.g., National Pollutant Discharge Elimination System [NPDES] General Construction Permit, and County Stormwater Ordinance), BMP descriptions i.e., rather than just a laundry list that likely means little to most readers), and BMP sources more pertinent to a County project (e.g., the California Stormwater Quality Association Handbooks). JH11

11. Page 6-5 (4th bullet) of the EIR (and Page 11 of the SWMP) states that "Runoff from Area 1 will be captured at various points by drainage pipes and released toward natural open space. This travel through open space allows for natural water quality treatment..." The SWMP also notes on Page 2, however, that "The West Fork of the West Branch of the San Vicente Creek and some small tributaries are also located on the site." Neither the EIR or the SWMP discusses whether or not this release of untreated runoff would enter any of the "small tributaries", and what associated water quality impacts might occur. JH12

12. Page 6-5 (5th bullet) of the EIR again notes that "runoff in Areas 2-6 will be directed toward vegetated swales which will also provide natural water quality treatment...", although as previously noted, the EIR concludes that, except for Area 5, these swales will provide only "minimal" water quality treatment. JH13

13. Page 6-5 (9th bullet) of the EIR and Page 11 (item 2 under Source Control BMPs) of the SWMP state that when the swimming pool filters "...are cleaned or backwashed, the water will go into a septic tank that leeches (sic) into the ground." Neither document discusses any potential impacts associated with the presence of chemicals (e.g., chlorine) in the filter cleaning and/or backwashing water. JH14

14. Page 6-6 (second to last bullet) and Page 13 (item 1 under Treatment Control BMPs)of the SWMP identify the use of detention basins as one of two principal treatment control BMPs, and note that "These basins will detain low flows...causing sediment and particulate matter to settle out. By removing particulates, the BMP also removes the pollutants attached to the particulates." While detention basins certainly provide some removal of particulates and attached contaminants, according to the Nationwide EPA BMP Menu, they are less effective at removing soluble pollutants, with typical removal rates as follows: (1) total suspended solids - 61%; (2) total phosphorus - 19%; JH15

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH9:
Please see response to comment JH4.

Response to Comment JH10:
Please see responses to comments G3, I12, I19, JI5.

Response to Comment JH11:
The County does not concur with this comment. The SWMP has been revised to include a section on Regulatory Framework, Sectian 2.2, which discusses the General Construction Permit and the General MS4 Permit. Additionally, Section 4.0 of the SWMP now references CASQA BMP Handbooks and provides additional discussion on construction period BMPs.

Response to Comment JH12:
A detention basin has been added to Area 1 to treat runoff from proposed developed areas and attenuate peak runoff from storm events. The added detention basin is discussed in the SWMP Attachment E.

Response to Comment JH13:
Please see response to comment JH5. The SWMP now includes SUSMP Table 4.2 and 4.3. Vegetated swales are only one component of the proposed Best Management Practices to address stormwater quality.

Response to Comment JH14:
The County does not concur with this comment. The SWMP does in fact discuss the potential presence of chlorine in the filter cleaning or backwashing water. As stated on pages 23 and 24 of the SWMP, "When the swimming pool is emptied, discharge water will be de-chlorinated with a de-chlorination kit to less than one PPM chlorine, as stated in County Code Section 67.805(d)(9). When the filters are cleaned or backwashed, the water will go into a septic tank that leeches into the ground. The amount of water associated with backwashing the filters is relatively small and can be handled by the camp's leech fields."

Response to Comment JH15:
Please see response to comment JH5. The SWMP now references removal efficiencies per SUSMP Table 4.2 and 4.3.

(3) total nitrogen - 9%; and (4) metals - 26 to 54%. Based on these figures and the previously described fact that (except for Area 5) the proposed vegetated swales are assumed to provide only "minimal" water quality treatment, runoff from most developed areas of the project will receive only marginal, at best, treatment prior to discharge into downstream receiving waters. As a result, substantial amounts of pollutants could potentially be discharged from the site, and the project as designed will not meet the MEP standard identified in the associated County and NPDES standards. Accordingly, the project should be redesigned to include additional and more effective treatment control BMPs. JH15 (cont'd.)

15. Page 6-6 (last bullet) of the EIR and Page 13 (item 2 under Treatment Control BMPs) of the SWMP again refer to vegetated swales being "...used in all areas as natural water quality treatment for the removal of heavy metals and sediments from runoff." As previously described, these statements are countered by text included on Pages 6-7 and 16 (respectively) of the same documents. As noted in the previous discussion regarding Page 6-6, due to the fact that one of the two major treatment control BMPs admittedly provides only "minimal" treatment, while the other has significant limitations in the removal of numerous pollutants, the project as designed will not meet the MEP standard identified in the associated County and NPDES standards and should be redesigned to include additional and more effective treatment control BMPs. JH16

16. Page 6-7 (Last bullet) of the EIR and Page 16 (last paragraph) state that the vegetated swales proposed to be used as treatment control BMPs in Area 5 will "Ideally...have a 1-2% slope", but "...will be designed with a maximum 4% slope." Vegetated swales are typically limited to maximum gradients of 2.5%, with steeper grades limiting effectiveness (as noted in the EIR and SWMP for other areas of the project). If grades exceeding 2.5% are proposed for vegetated swales in Area 5, the analysis of treatment effectiveness in EIR and SWMP should be revised, and the project design for this area should be revised to include additional and more effective treatment control BMPs. JH17

17. Page 6-11 (1st paragraph) of the EIR states that, regarding the proposed access road in and out of Area 6 (which is not tributary to any detention basin due to "elevational differences"), "It is anticipated that the potential pollutants from this access road are minimal." No information to substantiate this assertion is provided, yet this assumption is the basis for concluding that runoff from this access road can be discharged directly into the West Branch of San Vicente Creek with "less than significant" impacts and street sweeping as the only proposed BMP. This project feature needs to be reassessed to (as discussed above for other areas) provide appropriate treatment control for anticipated pollutants (including oil & grease and heavy metals per Table 4 of the SWMP). JH18

In addition to the above references, additional comments on the SWMP include the following:

18. Page 8 lists sediment and construction material waste as the main potential pollutants associated with construction activities. This discussion and the associated BMPs should JH19

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH16:
Please see response to comment JH5.

Response to Comment JH17:
Please see response to comment JH5. Per SUSMP Appendix F Section F.1 "Biofilters", "No minimum lengths or maximum slopes are required for treatment purposes." Table F.1 states, under design factors: "No minimum dimensions or slope restrictions for treatment purposes."

Response to Comment JH18:
Area 6 has been revised to include two detention basins along the proposed access road. These detention basins will receive and treat runoff from the access road prior to release of discharge as well as attenuate peak flows from storm events. Therefore, appropriate treatment controls for anticipated pollutants from the proposed access road is provided.

Response to Comment JH19:
The County does not concur with this comment. Section 4.0 of the SWMP, pages 13-14, provides a list of construction activities and materials that includes, but is not limited to, the pollutants listed in the comment (fuels, lubricants, solvents, paints, and portable toilet waste).

be revised to include the on-site use and storage of construction-related hazardous materials such as fuels, lubricants, solvents, paints and portable septic system wastes. JH19 (cont'd.)

19. Page 9, Table 4, should be revised to include sediment as a potential pollutant for parking lots and roads, and fuel as a potential pollutant for the maintenance facilities (per the discussion in the last paragraph on Page 8). JH20

20. Page 11 (item 5 under Site Design BMPs) identifies catch basin inserts for the fuel storage area, although such facilities are not listed in Table 5-1 (Page 17) or described in Section 6.0 (Maintenance Responsibilities and Funding). JH21

21. Page 11 (item 4 under Source Control BMPs) notes that grease traps will be employed at the proposed kitchen, although no maintenance requirements are identified in Section 6.0. JH22

22. Page 11 (item 10 under Source Control BMPs) states that "parking lots will be swept periodically...". This measure should be revised to include access roads and provide a quantified sweeping schedule (e.g., sweeping every two weeks). JH23

23. Page 12 (item 17 under Source Control BMPs) describes the fact that hazardous materials such as paint thinner and acetone stored on-site will be covered. This measure should be expanded to include the use of secondary containment to prevent off-site discharge in the event of a spill. JH24

24. Page 17 (Table 5-1) lists potential pollutants and proposed BMPs, but does not include herbicides and cleaning agents as identified on Page 9 (Table 4). JH25

25. Page 18 (2nd paragraph) states that vegetated swales will "...provide enhanced water quality treatment for the storm water runoff. They will act a pre-treatment, but are not considered as a main treatment control BMP." The SWMP itself, however, notes on Page 16 (as discussed above in previous comments) that water quality treatment provided in vegetated swales (except for Area 5) will be "minimal". Stating that such features will provide "pre-treatment" (a term that is not defined or qualified in any way) is misleading due to the fact that the noted swales will provide little if any water quality benefit. In addition, as noted in previous comments, the swales proposed for Area 5 will not provide effective treatment if, as potentially proposed, they include grades in excess of 2.5%. JH26

26. Page 18 (4th paragraph) states that runoff from Area 5 "...will be directed by berms along the edge of the parking lot and released into natural drainage swales at two location." What are these "natural drainage swales"? If this statement intends that runoff from the parking lot will be discharged into natural drainage courses without adequate (or any) water quality treatment, this project feature will not meet the MEP standard and should be redesigned to include treatment control BMPs prior to discharge. JH27

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH20:
The County does not concur with this comment. Sediment is not considered a potential pollutant for parking lots and roads as these areas will be paved, precluding the potential for sedimentation beneath the paved areas. Fuel is identified as a potential pollutant in the maintenance facility and BMPs are proposed to address the storage, use, and handling of fuel on-site.

Response to Comment JH21:
The SWMP has been revised and catch basin filter inserts are no longer included in the project. Pollution prevention from fuel storage and non-retail fuel dispensing areas will be controlled through Source Control BMPs provided in the SWMP. These Source Control BMPs include secondary containment equal to 110% of capacity, paved with impervious surface, grade break to prevent run-on from surrounding areas, overhanging roof or canopy, and compliance with a County Department of Environmental Health approved business plan that will be amended prior to any activity involving the fuel tanks.

Response to Comment JH22:
Grease traps at the proposed kitchen will be maintained in accordance with County Department of Environmental Health (DEH) regulations, Section C.4.5 Eating and Drinking establishments. The grease traps are required per DEH regulations on Eating and Drinking Establishments and are not treatment control BMPs for storm water runoff and are therefore not included in Section 6.0 of the SWMP.

Response to Comment JH23:
The parking areas and access roads will be paved and swept periodically in compliance with the SWMP. Sweeping of parking lots and/or roads paved with asphaltic concrete will occur monthly during the first year after the project is completed. At that time, the frequency of sweeping will be re-considered and adjusted (either more or less frequently) as site conditions require. Depending on site conditions, anticipated amount of traffic and grades of roads and parking lots, it is anticipated that paving could potentially include both asphaltic concrete and decomposed granite surfaces. The Site Design, Source Control and Treatment Control BMPs (vegetated swales and extended detention basins) prescribed for the project address sediment, heavy metals and oil & grease, which are the pollutants that would be generated from both types of surfacing.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH24:
Section 5.3 of the SWMP has been revised to include secondary containment for chemical ond material storage areas, sized to 110% of capacity.

Response to Comment JH25:
The proposed SWMP addresses the potential use of herbicides and cleaning agents. See also response to comment G1.

Response to Comment JH26:
Please see response to comment JH5 and JH17. The SWMP references Appendix F of the SUSMP for design parameters for vegetated swales as treatment control BMPs.

Response to Comment JH27:
The project does not propose to discharge runoff into natural drainage courses without adequate water quality control treatment. The parking lot and all paved areas will have secondary treatment in compliance with County's Maximum Extent Practicable (MEP) standard. Runoff from Area 5 will be directed through vegetated swales prior to discharge into natural drainage courses.

27. Page 18 (4th paragraph) states that "waste oil and filters will be stored in two 5 gallon covered buckets to prevent contact with runoff and pollution of storm water." This measure should be expanded to include secondary containment and specific maintenance procedures for proper handling and disposal of the contents of these buckets. JH28

28. Page 19 states that, with respect to runoff from the access road in and out of Area 6, "In addition, vegetated swales will be used to route the runoff around the improved site. This use of vegetated swales provides natural water quality treatment." As noted in previous comments, this statement should be clarified to indicate if this "natural water quality treatment" would consist of discharging untreated runoff from an access road into natural drainage courses. If so, this feature should be redesigned to include treatment control BMPs prior to discharge. JH29

29. Page 21 (Section 6.5) lists a number of source control BMP maintenance activities that involve "checking" various features to ensure proper function, etc. These measures should be expanded to include specific schedules (e.g., monthly, etc.) for such inspections. JH30

Submitted by Anonymous
Prepared for the Mussey Grade Road Alliance
3/27/2005

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Response to Comment JH28:
Secondary containment will be provided for the two five-gallon covered buckets proposed to be used for storage of waste oil and filters. SWMP has been revised to include secondary containment for the 5 gallon buckets and proper handling and disposal of the contents of these buckets.

Response to Comment JH29:
No untreated discharge will occur from the access roads into natural drainage courses as these areas will include vegetated swales and detention basins.

Response to Comment JH30:
Preparation of an Engineer's Report for ongoing BMP maintenance will be a condition of approval for the project, as discussed in Section 6.0 of the SWMP. Section 6.1 of the SWMP provides maintenance frequencies for standard site design and source control BMPs. The engineer's report will include maintenance frequencies for all project specific site design, LID, source control, and treatment control BMPs.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Volume II – Footnoted Materials:

The following footnoted materials were included as Volume II of the Mussey Grade Road Alliance's Comment Report on the Draft EIR. Several of these documents were repeated throughout Volume II. In order to reduce any redundancies and unnecessary reproduction of duplicated documents, only one copy of each document is included in the Final EIR.

Each of the footnoted materials were reviewed to determine whether a formal response to the information presented is necessary.

Letter dated September 10, 1997 from County of San Diego Environmental Health to Code Enforcement regarding notice of violation at 14488 Mussey Grade Road, Ramona, CA - This letter addresses violations issued by the DEH in 1997. These violations have been resolved and there are currently no outstanding zoning violations filed against the Salvation Army.

Draft Specific Plan dated August 20, 2001 for the proposed Salvation Army Divisional Camp and Retreat Specific Plan – This document is one of the screen check draft Specific Plans originally prepared for the project. On April 30, 2003, Board Policy I-59, which required approval of a specific plan for the proposed project, was rescinded. As such, the Salvation Army withdrew its application for approval of the specific plan. However, it should be noted that the majority of the land use and community character analysis included in the subject screen check draft specific plan is included in the EIR.

San Diego County Planning Commission decision dated December 18, 1970 on the application of First Presbyterian Church of San Diego for a church retreat and recreational facility - This decision does not pertain to the proposed project or analysis included in the EIR. As such, additional response is not necessary.

San Diego County Planning Commission decision dated March 12, 1976 on the application of First Presbyterian Church of San Diego for a special use permit modification - This decision does not pertain to the proposed project or analysis included in the EIR. As such, additional response is not necessary.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Volume II – Footnoted Materials: (cont'd.)

County of San Diego Department of Planning and Land Use letter dated April 16, 1998 regarding a decision of the director, Department of Planning and Land Use, on minor deviation from plot plan and major use permit - This letter does not pertain to the proposed project or analysis included in the EIR. As such, additional response is not necessary.

News article entitled "Local Planners reject Salvation Army Camp Plan," dated July 8, 1999 – The included news article includes editorial commentary on the project as proposed in 1999, nearly six years ago. The news article does not pertain to the analysis included in the EIR. As such, additional response is not necessary.

Ramona Community Planning Group Draft Findings Under 7358 on the Proposed Master Plan for the Salvation Army Sierra Del Mar Divisional Camp and Conference Center to the San Diego County Department of Planning and Land Use, dated November 9, 2000 – These draft Findings do not address the project as currently proposed. Nevertheless, the issues raised have been repeated by the Mussey Grade Road Alliance in comments submitted on the Draft EIR. Please see responses to comments JCC1 through JCC24.

Project Narative, Proposed Master Plan for the Salvation Army Sierra Del Mar Divisional Camp and Retreat Center, dated June 21, 2001 - This narrative was prepared by Matalon Architecture to assist in defining the details of the proposed project. However, since 2001, the project has undergone significant revisions. Additional response is not necessary.

County of San Diego Department of Planning and Land Use letter to the Salvation Army regarding the Salvation Army Divisional Camp and Retreat EIR; MUP 70-379w2; ER 98-14-023; SCH 20000e31058; Results of On-Site Biology Meeting, dated November 16, 2001 – Through a comprehensive iterative process, the County determined that the comments raised in this letter were adequately addressed in the draft EIR. Additional response is not necessary.

County of San Diego Multiple Species Conservation Plan Sub-Area Plan Map – MSCP compliance is addressed in EIR Sections 2.3 and 3.1.2. Additional response is not necessary.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Volume II – Footnoted Materials: (cont'd.)

California Environmental Quality Act Excerpts; Mussey Grade Road Alliance letter to Supervisor Dianne Jacob regarding Salvation Army, dated June 5, 2001; Peterson & Price letter to the Department of Planning and Land Use regarding Salvation Army Sierra Del Mar Divisional Camp and Retreat, Major Use Permit Amendment, Specific Plan & EIR, dated May 31, 2001; Project process timeline; County of San Diego Department of Planning and Land Use letter to Peterson & Price, regarding P70-379W2, Salvation Army Divisional Camp; Denial of Due Date Extension, dated April 26, 2001; Mussey Grade Road Alliance letter to Department of Planning and Land Use regarding Salvation Army Sierra Del Mar Camp Project on Mussey Grade Road, dated May 22, 2001; Peterson & Price letter to Department of Planning and Land Use, regarding P70-379W2 Salvation Army Divisional Camp Request of Extension, dated May 11, 2001; County of San Diego, Department of Planning and Land Use letter to Peterson & Price regarding P70-379W2, Salvation Army Divisional Camp, dated June 6, 2001 - The County has not treated the Salvation Army with special processing. Additional response is not necessary.

Mussey Grade Road Alliance letter to County of San Diego Board of Supervisors, dated June 5, 2001 - The County has not treated the Salvation Army with special processing. Additional response is not necessary.

Mussey Grade Road Alliance memo regarding presentation of the Board of Supervisors for the proposed Salvation Army Project on Mussey Grade Road, dated June 13, 2001 - The County has not treated the Salvation Army with special processing. Additional response is not necessary.

Public testimony regarding the Salvation Army Project from various people - The issues raised have been repeated by the Mussey Grade Road Alliance in comments submitted on the Draft EIR. Please see responses to comments to letter J.

Mussey Grade Road Alliance letter dated June 25, 2001 to Mr. Robert Copper, Deputy Administrative Officer, County of San Diego regarding Report on Fairness of Process Regarding Salvation Army Project - The County has not treated the Salvation Army with special processing. Additional response is not necessary.

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Volume II – Footnoted Materials: (cont'd.)

Mussey Grade Road Alliance letter dated July 2, 2001 to Supervisor Dianne Jacob regarding lack of action concerning Board of Supervisors June 13th request to the CAO to produce a report evaluating the fairness of the process in the handling of the application of the Salvation Army. The County has not treated the Salvation Army with special processing. Additional response is not necessary.

County of San Diego Chief Administrative Office letter dated July 26, 2001 to Supervisors Horn, Roberts, Cox, Jacob, and Slater regarding processing of Salvation Army Divisional Camp and Retreat Major Use Permit; MUP70-379W2.

County of San Diego Planning and Land Use letter dated October 8, 2001 to The Salvation Army, Major David Hudson regarding Salvation Army Divisional Camp and Retreat EIR; MUP 70-379W2; ER 98-14-023; SCH 2000031058; Second Iteration Review of the Screencheck Draft Environmental Impact Report, Specific Plan Text, and Landscape Plans

Peterson & Price letter dated November 7, 2001 to Mr. Eric Gibson, Chief, Department of Land Use, County of San Diego regarding Salvation Army Divisional Camp and Retreat EIR; MUP 70-379W2; ER 98-14-023; SCH 2000031058; 2nd Screen Check Draft EIR, Specific Plan Text and Landscape Plans

Mussey Grade Road Alliance letter dated November 8, 2001 to Gary Pryor, Director, Department of Planning and Land Use, regarding Salvation Army Missed Deadline

County of San Diego Department of Planning and Land Use letter dated November 15, 2001 regarding extension of project due date for submittals on the Salvation Army Project

County of San Diego Department of Planning and Land Use letter dated November 16, 2001 to The Salvation Army Major David Hudson regarding Salvation Army Divisional Camp and Retreat EIR; MUP 70-379W2; ER 98-14-023; SCH 2000031058; Approval of Due Date Extension

RESPONSE TO COMMENT LETTER FROM MUSSEY GRADE ROAD ALLIANCE, HYDROLOGY CHAPTER (JH SERIES) DATED MARCH 28, 2005

(CONTINUED)

Volume II – Footnoted Materials: (cont'd.)

Ramona Community Planning Group letter dated October 21, 2001 to Joe Farace, Project Planner, Department of Planning and Land Use regarding MUP 70-379W2RPL, SP00-06RPL, Salvation Army Divisional Camp and Retreat Presentation, Mussey Grade Road

Mussey Grade Road Alliance letter dated September 7, 1999 to San Diego County Department of Planning and Land Use regarding proposed master plan for the Salvation Army Camp and Conference Center, Major Use Permit #p70-379W

County of San Diego Department of Planning and Land Use notice of availability of a draft environmental impact report dated February 10, 2005

Ramona Community Planning Group letter special meeting agenda for March 16, 2005

The Charitable Events Registry "The Art of Giving" awards from San Diego Magazine in 2005

Septic System Feasibility Study for the Salvation Army Camp dated November 2, 2000 by Vinje & Middleton Engineering, Inc.

MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

P.O. Box 683
Ramona, CA 92065
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Steering Committee:
Diane Conklin, Spokesperson
Carol Levin, Treasurer
Bruce Meador, Member
Donna Schneider, Member
Joseph Mitchell, Member

COMMENT REPORT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT OF THE SALVATION ARMY

VOLUME II

FOOTNOTED MATERIALS IN THE INTRODUCTION

County of San Diego

DANIEL J. AVERA
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
P.O. BOX 85261, SAN DIEGO, CA 92186-5261
(619) 338-2222 FAX (619) 338-2377

LARRY T. AKER
ASSISTANT DIRECTOR

Code Enforcement
338 Via Vera Cruz, Suite 201
San Marcos, Ca. 92069-2647

September 10, 1997

Salvation Army
C/O Richard Payne
14488 Mussey Grade Road
Ramona, Ca. 92065

SUBJECT: NOTICE OF VIOLATION at
14488 Mussey Grade Road, Ramona California

Dear Mr. Payne:

This letter shall serve as a NOTICE OF VIOLATION on property 14488 Mussey Grade Road, Ramona California. Assessor's records for San Diego County show this property, Parcel No. 327-010-49-00 as being owned by the Salvation Army. Information by the area Health Inspector indicate the property to be under your care.

This property was granted major special use permit number P70-379 to the First Presbyterian Church of San Diego on December 24, 1970. This permit allowed for a church retreat and recreational facility to include five cabins, a program lodge hall, a dining room and a swimming pool with bath facilities.

This permit was modified March 12, 1976 and assigned permit number P70-379W. The modification granted the addition to the existing church retreat and recreational facility of five guest cabins, a youth activities building and two staff housing units. Prior to this modification the existing facilities consisted of five cabins, a program lodge hall, a ranch house, a swimming pool with a bath house, a maintenance garage and recreational areas.

The Salvation Army acquired this property March 14, 1997 and opened a camping facility under the name of SIERRA DEL MAR. A recent inspection on August 12, 1997 revealed various zoning violations.

VIOLATIONS:

1. Camp ground office with all utility hook-ups not part of major use permit.
2. Snack bar with electrical and plumbing hook-ups not part of major use permit.
3. Stone washer and dryer area with electrical and plumbing hook-ups not part of major use permit.

4. Five "URTS" not part of major use permit.

5. Occupied mobile home not part of major user permit.

6. Two miscellaneous electrical sub-panels not part of major user permit.

7. Large assembly tent not part of major use permit.

YOU ARE HEREBY ORDERED TO COMPLY with the provisions of the San Diego County Code/Zoning Ordinance by:

1. Meeting with San Diego County Planning Department to include the additional uses in the major use permit

2. Meeting with San Diego County Planning Department regarding the increase of occupancy

3. Meeting with San Diego County Planning Department to include as part of major use permit any future proposed additional uses

4. Contacting Mary Lou White, Health Specialist prior to making any modifications to any food services or items

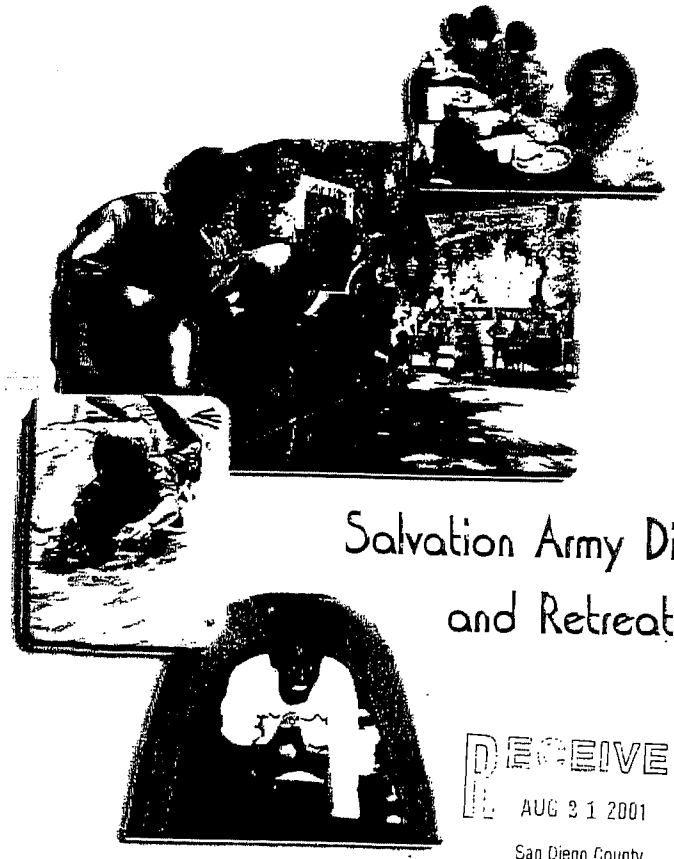
Compliance must be accomplished no later than 45 days from the date of this letter. Should you have any questions or require further assistance, please contact me at (760)940-2855, Department of Environmental Health. Thank you for your cooperation.

Sincerely,

Saul H. Valdez
Code Enforcement Officer

cc: Phleger & Harrison Brobeck, Owner of Record
Major Doug O'Brian, Administrator
Richard Payne, Coordinator
Mary Lou White, Health Specialist

Draft Specific Plan



for the proposed

Salvation Army Divisional Camp and Retreat Specific Plan

SCH No. 2000031058
ER98-14-023
SP00-06
P70-379W2

RECEIVED
AUG 3 1 2001
San Diego County
DEPT. OF PLANNING & LAND USE
SP 00-06

August 20, 2001

SAN DIEGO COUNTY PLANNING COMMISSION

Room 207, County Administration Center San Diego, California 92101

December 18, 1970

Decision of the Commission
On the Application of First Presbyterian Church of San Diego
Application Number P70-379

GRANT, as per plot plan, special use permit for a church retreat and recreational facility to include five cabins, a program lodge hall, dining room, and swimming pool with bath facilities, on condition that:

A. Prior to obtaining any permit pursuant to this special use permit, the applicant shall:

1. Grant to the County, without cost, sufficient additional right of way to provide 42 feet from the existing centerline of Mussey Grade Road. Done

2. File with the County Engineer a covenant agreeing not to oppose the formation of any road improvement district along Mussey Grade Road. Done

3. Obtain a percolation test approved by the San Diego Department of Public Health. Done

4. Obtain water from a water company having a permit from the State Department of Public Health or the San Diego Department of Public Health. If water cannot be obtained from an existing water company, the applicant shall obtain a permit from the San Diego Department of Public Health to operate a water supply system. The water supply shall be of acceptable chemical quality and provide a safe and sufficient quantity of water. Done. Remove well

5. Plans be approved by the Department of Sanitation and Flood Control so that the natural watercourses are not obstructed, diverted, or otherwise altered to adversely affect the adjacent ownerships. Done

B. All light fixtures shall be so designed and adjusted as to reflect light downward, away from any road or street and away from any other premises.

C. No loudspeaker or sound amplification system be used so as to produce sounds audible beyond the boundaries of the subject property.

P70-379W

SAN DIEGO COUNTY PLANNING COMMISSION

207 San Diego County Administration Center San Diego, California 92101
Phone: 239-7711, Ext. 435

Application For Special Use Permit Application Number P70-379
Name of Applicant First Presbyterian Church of San Diego
Location of Property West side of Mussey Grade Road, south of Rosemont.

Property In LC Zone, Rosemont Area ~~Zoning District~~

DECISION OF THE COMMISSION ON December 18, 1970

SEE ATTACHED "DECISION OF THE COMMISSION", Dated December 18, 1970.

REASONS FOR DECISION OF THE COMMISSION:

1. Subject property was established as a church retreat prior to zoning of the area.

2. The retreat is slated for very extensive development over the next several years. A new bath house for a proposed swimming pool has been constructed which sets the style of construction for future cabins and recreation buildings.

3. It is felt that a well-planned church-sponsored recreational retreat is a desirable use for the property.

PROTESTANTS TO DECISION OF THE COMMISSION:

NONE

This special use permit expires December 24, 1971, unless construction and/or use in reliance on it has started, or unless an extension previously has been granted by the Commission.

I certify that the foregoing Decision was duly adopted by the San Diego County Planning Commission on December 18, 1970.

Dan C. Cherrier

Dan C. Cherrier, Secretary

Dated: December 24, 1970

By

P70-379W

LAND USE AND ENVIRONMENTAL REGULATION

9150 Chesapeake Street San Diego, California 92123

March 12, 1976

OFFICIAL COPY

Decision of the Commission
On the Application of FIRST PRESBYTERIAN CHURCH OF SAN DIEGO
Application Number P70-379W

GRANT, as per plot plan dated November 28, 1975 (Sheet 1) and February 17, 1976 (Sheet 2) and approved concurrently herewith, a special use permit modification pursuant to Sections 486 and 719 of The Zoning Ordinance, for the addition to an existing church retreat and recreational facility of five guest cabins, youth activities building and two staff housing units. Existing facilities consist of five cabins, program lodge hall, ranch house, swimming pool with bath house, maintenance garage and recreational areas.

The following conditions are imposed with the granting of this special use permit:

A. Prior to obtaining any building permit pursuant to this special use permit, the applicant shall:

1. Cause execution of an irrevocable offer to dedicate to the County, without cost, sufficient additional right-of-way to provide 51 feet from the centerline of Mussey Grade Road (Route Location Study SA 325).

2. Submit for the approval of the Department of Public Health, Sanitation Division, percolation tests showing that the site will support the required subsurface sewage disposal system. (Compliance with this condition may be accomplished separately for the cabin sites and the staff housing as construction of each is desired.)

B. Prior to any occupancy or use of the premises pursuant to this special use permit, the applicant shall obtain from the Department of LUER certification that specified conditions of the permit have been met. Building Inspection shall not perform final inspection or authorize permanent clearance of utilities until the Director of LUER has certified that all conditions of the subject permit have been met to the satisfaction of the Department of LUER.

Upon certification by the Director of LUER for occupancy or establishment of use allowed by this special use permit, the following conditions shall apply:

C. All light fixtures shall be designed and adjusted to reflect light downward, away from any road or street, and away from any adjoining premises, and shall otherwise conform to Section 534.5 of The Zoning Ordinance.

D. No loudspeaker or sound amplification system shall be used to produce sounds audible beyond the boundaries of the premises.

OFFICIAL COPY

Pursuant to Section 710 of The Zoning Ordinance, the following findings in support of the granting of the special use permit modification are made:

(1) The granting of such special use permit modification will not be materially detrimental to the public health, safety or welfare or injurious to the property or improvements in such vicinity and zone in which the property is located.

The facts supporting Finding (1) are as follows:

(a) The size of the property and the relatively low intensity of the use, as proposed, should preclude any adverse affects.

(b) No complaints regarding the operation of this facility have been received by the Zoning Enforcement Officer. The proposed expansion should likewise not prove objectionable to surrounding property owners.

(2) The granting of such special use permit modification will not adversely affect any master or precise plan adopted pursuant to law.

The fact supporting Finding (1) is as follows:

The relatively low intensity of this facility avoids the necessity for an urban level of services and provides ample open space in conformance with the objectives of the "Rural Residential" and "Mountain Development" categories of the General Plan.

JHM:sb
2/26/76

SAN DIEGO COUNTY PLANNING COMMISSION

OFFICIAL COPY

9150 Chesapeake Road San Diego, California 92123

To: First Presbyterian Church of San Diego
320 Date Street
San Diego, California 92101

Phone: 565-5924

Date: March 24, 1976

NOTICE OF DECISION OF PLANNING COMMISSION

This is to notify you that on March 12, 1976, your application for a special use permit Application Number P70-379W was granted conditionally by the San Diego County Planning Commission as more particularly set forth in the attached Decision of the Planning Commission.

Your attention is called to Sections 707.2, 707.3, 707.4 and 804.2 of The Zoning Ordinance (Ordinance No. 1402 (New Series), as amended) relating to the right to appeal to the Board of Planning and Zoning Appeal. In substance these sections provide that the only persons that may appeal are the applicant or the persons shown by the attached Decision to have protested at the hearing before the Planning Commission.

The Decision of the Planning Commission becomes final on April 6, 1976 unless prior to that date you or a protestant files in the office of the Planning Commission a written appeal to the Board of Planning and Zoning Appeals accompanied by a fee of $25. Filing of an appeal will stay the Decision of the Planning Commission until a new hearing on your application is held and action taken by the Board of Planning and Zoning Appeals. If there were no protests at the hearing before the Planning Commission, and you do not desire to appeal, you may now consider the Decision of the Planning Commission to be final. If the Planning Commission granted a variance or special use permit and no appeal is taken by the applicant or a protestant and as a consequence said decision becomes final, the attached Decision shall constitute the variance or special use permit granted by the Commission.

Bruce H. Warren, Secretary
By Harold E. Mattly
Harold E. Mattly, Deputy

I certify that on March 24, 1976 a copy of the foregoing Notice of Decision of Planning Commission together with the Decision of the Planning Commission referred to therein were filed in the office of the Planning Commission and a copy thereof mailed to the applicant at the address shown on the application.

Bruce H. Warren, Secretary
By Harold E. Mattly
Harold E. Mattly, Deputy

COUNTY OF SAN DIEGO

INTER-DEPARTMENTAL CORRESPONDENCE

DATE February 26, 1976

TO: Planning Commission
County Clerk

FROM: Environmental Review Board

NOTIFICATION OF NEGATIVE DECLARATION: FIRST PRESBYTERIAN CHURCH, P70-379W
Log #76-14-7, 562 acres, Mussey Grade Road, Ramona (Supv. Dist. V)

This project, a request for a modification of an existing Special Use Permit for the construction of an additional five camper cabins, two buildings for staff housing, and a large hall on 562 acres of an existing church retreat and recreational facility, west of Mussey Grade Road in southern Ramona, has been examined by the Environmental Review Board, and it is found that the proposed project will not have a substantial adverse (significant) environmental impact.

Reasons for this finding:

1. This project will require minimal grading for the installation and construction of pre-built cabins, staff housing, and lodge hall; therefore, no significant impacts on archaeological or biological resources are anticipated.

2. The proposed additions will generate 54 additional persons on an existing recreational facility; therefore, no significant growth-inducing impacts are foreseen.

3. The project site has adequate percolation rates to support a subsurface sewage system.

Additional copies of this Negative Declaration may be obtained at the Environmental Analysis Division, 9150 Chesapeake Drive, San Diego 92123.

The applicant has been notified on February 26, 1976.

Respectfully submitted,

for DAVID C. NIELSEN, Secretary
Environmental Review Board

DCN:GAW/BM:alk

FILE COPY

County of San Diego

GARY PRYOR
DIRECTOR
(619) 694-2962

DEPARTMENT OF PLANNING AND LAND USE
5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (619) 694-2960

April 16, 1998

Decision of the Director, Department of Planning and Land Use
on Minor Deviation from Plot Plan
Major Use Permit P70-379W^{1}M^1

A revised plot plan dated March 20, 1998, was submitted by The Salvation Army for a "Minor Deviation" from plot plan approved in connection with Major Use Permit P70-379W^1 for a church retreat and recreational facility. The applicant's request is to add a snack bar, a craft building, five yurt tent structures and one temporary yurt, a mobilehome for a caretaker residence, and a temporary assembly tent. Property located at 14488 Mussey Grade Road in the Ramona area in the A70 Limited Agriculture Land Use Regulation.

In accordance with Section 7609 of The Zoning Ordinance, the Director, Department of Planning and Land Use hereby finds that the proposed Minor Deviation does not constitute a substantial change in the Major Use Permit and that said Deviation will not adversely affect adjacent property or adjacent property owners, and approves said Minor Deviation as per revised plot plan.

DEFENSE OF LAWSUITS AND INDEMNITY: The applicant shall: (1) defend, indemnify and hold harmless the County, its agents, officers and employees, from any claim, action or proceeding against the County, its agents, officers or employees to attack, set aside, void or annul this approval or any of the proceedings, acts of determination taken, done or made prior to this approval, if the action is brought within the time period specified in Government Code Section 66499.37; and (2) reimburse the County, its agents, officers and employees for any court costs and attorney's fees which the County, its agents or officers or employees may be required to pay as a result of this approval. At its sole discretion, the County may participate at its own expense in the

defense of any such action, but such participation shall not relieve the applicant of any obligation imposed by this condition. The County shall notify the applicant promptly of any claim or action and cooperate fully in the defense.

The issuance of this permit by the County of San Diego does not authorize the applicant for said permit to violate any Federal, State or County laws, ordinances, regulations or policies including, but not limited to the Federal Endangered Species Act of 1973 and any amendments thereto (16 U.S.C. Section 1531 et seq.).

DEPARTMENT OF PLANNING AND LAND USE
GARY L. PRYOR, DIRECTOR

By: Patricia Jarfoune
for JAMES C. CHAGALA, Chief
Current Planning

JCC:KM:dld

Enclosures

cc: Richard Payne, 14488 Mussey Grade Road, Ramona, CA 92065

MDS.98\P70379.398;jcr

Local planners reject Salvation Army camp plan

ire Than 100 Years
July 8, 1999
50 Cents
(Tax included)
VOLUME 113 - NUMBER 18

By BRIAN HAZLE
Staff writer

The Salvation Army met heavy resistance from residents and planners when it unveiled a major expansion plan for its Ramona campground and conference center.

After hearing impassioned pleas from several residents and a Sierra Club representative, the Ramona Community Planning Group unanimously recommended that the county reject the plan as proposed, and that it require a full environmental impact study on the Mussey Grade Road site.

The action came at last Thursday's monthly planning group meeting. Opponents argued, among other things, that the Salvation Army project would increase traffic and disrupt the area's rural environment.

"We never could have imagined in our wildest nightmare that (the Salvation Army) would want to build a resort," said Ramona resident Robynne Hanus, whose Mussey Grade home is adjacent to the existing camp. The plan, if approved by the county, would allow the Salvation Army to house up to 850 people compared with about 275 currently.

Hanus showed a photo of the view from her home then held a plastic overlay which she said indicated how new buildings proposed in the Salvation Army master plan would intrude on her view.

The Salvation Army purchased the 575-acre campground in 1997 from the First Presbyterian Church of San Diego, which used the facility in much the same way the Salvation Army has used it—as a retreat for youth and adult groups.

The expansion plan, which would be implemented in six phases over the next 20 years, calls for a number of new buildings highlighted by a 72,500-square-foot conference center—which would include five two-story motel-like structures to house 175 guests, two tennis courts, a swimming pool and a shower, spa and toilet building. Other buildings proposed under the plan are a 24,000-square-foot dining facility, a 21,000-square-foot multi-purpose building and several cabin and tent-like camping facilities. An RV parking area, a new parking lot and maintenance facility are among other proposed improvements.

The plans apparently reached the planning group as it voted unanimously and without hesitation against the plan as presented. If approved by the county, the master plan would allow the Salvation Army to go through the environmental and site analysis process

See ARMY, page A10

Army, continued from page A1

only once, instead of each time it embarks upon a new phase of expansion.

"Part of the idea was to integrate (the buildings) into the design of the topography," said Michael Matalon, architect for the Salvation Army.

Matalon told planners that a cursory environmental study was commissioned and that the proposed plan would have little impact on the environment; therefore he did not believe a full environmental impact study was necessary.

Planners disagreed.

"Due to the scope, size and potential adverse impacts upon the environment and community character, the Ramona Community Planning Group requests the county deny the major use permit modification," planner Ralph Turner said in a motion to reject the project. "In addition, prior to any future consideration...a full comprehensive (environmental impact report) be required...."

However, the Salvation Army said Friday that it will continue to try to move forward with the project and work with the neighbors to maintain the beauty of the area. Major David Hudson of the Salvation Army said he expects to hear from the county on the proposal sometime this month.

"We'll continue to move forward," Hudson said. "We feel this is the best for San Diego County and the children we serve."

But the Sierra Club said environmental concerns and safety issues outweigh the importance of expanding the camp.

Lynne Baker, chairman of the Sierra Club's parks and open space committee in San Diego, said though the intentions of the Salvation Army are honorable, the plan would place commercial demands on an area that is zoned rural residential. Furthermore, she argued that it would be nearly impossible to evacuate the camp in an emergency, such as a fire.

"We think that an EIR is absolutely required here," Baker said. "We'd like to ask you to do three things. We'd like you to make findings that it is inconsistent with the residential character of the neighborhood, we'd like you to require that a full EIR be done...and finally we'd like you to deny the request for the major use permit."

The Sierra Club and the host of residents who spoke out against the Salvation Army plan got what they wanted from Ramona planners; however the county Department of Planning and Land Use will have the final say on the future of the project.

RCPG nixes Salvation Army plan to expand campground

By Eric Leins
Ramona Sentinel

Despite what proponents called significant and scaled-down changes to a 20-year campground expansion plan, the Salvation Army once again failed to grab formal, local support for a project that could [illegible]e capacity at the Mussey [illegible] Road site from under 300 [illegible]sers to nearly 780.

With an 8-5 vote, the Ramona Community Planning Group moved to deny the Army's latest proposal, claiming that even the scaled-down version presents fire and traffic hazards, negative environmental impacts, and a commercial use that is out of harmony with the rural residential neighborhood it occupies.

Voting against the Salvation Army expansion at last Thursday's planning session were Carol Angus, Janet Gilbert, Jeff Hedgecock, Kristi Mansolf, Sam Mitchell, Fred Sproul, Dutch van Dierendonck, and Patrick Uriell. Dissenting from the majority were Chris Anderson, Steve Butler, Dale Eiler, Kathy Finley, and Debi Jennings. Planners Keith Bowen and Angus Tobiason were absent.

Denying the project did not come without strong opposition from a packed Ramona Community Center

Please turn to page A2

Campground

From page A1

made up largely of Salvation Army supporters from Ramona and San Diego County.

Following a presentation by a Salvation Army lawyer, architect, and youth minister, proponents implored the local planning group to support, as they described it, an organization that wants to increase its existing role of helping children, seniors, and other adults in the community and elsewhere.

"I think they're part of the solution, not part of the problem," asserted Ramona resident Paul Tarr, referring to the Salvation Army's role as a charity organization as well as the Army's intent to expand the 575-acre parcel as a camping facility and not a large housing project.

Over the past three years, the Salvation Army has scaled back its expansion plan and made other modifications in an attempt to satisfy local concerns and county regulations, other proponents noted. Among the changes in the Army's proposal was a reduction in maximum occupancy from 1,000 users to 778, a reduction in the amount of buildings from 75 to 65, and a reduction in the amount of camping sites and RV parking spaces from 35 to 15.

The Army also modified its water usage plan so that it would meet fire safety standards and not impact the colonnade of old oak trees along Mussey Grade Road.

"We tried to work through issues. We tried to talk about compromises, but we have not been able to even meet middle ground," Salvation Army lawyer Matt Peterson said about the Mussey Grade Road Alliance, a west end group of residents opposed to the expansion. "We've sort have been negotiating against ourselves."

In addition, Army proponents said that the facility, accredited by the American Camping Association, would not be visible from any public vantage point along Mussey Grade Road and that an expanded camping facility would provide more opportunities for everyone, from seniors to underprivileged children, to enjoy Ramona and the outdoors.

"We don't want to just develop land. We want to develop lives," Salvation Army camp director and youth minister Capt. Dianne Doom said.

A letter from the county's chief administrative officer, Walt Ekard, described the project "to have decreased in size by less than 10 percent" and called the changes "relatively minor."

Planners also heard from the Mussey Grade Road Alliance. Among them was Bonnie Hendricks' assertion that the proposed expansion would "irreversibly fragment a core biological resource area" that serves as habitat for mountain lions, golden eagles, and other sensitive animals and plants.

Hendricks, a biologist, also noted that the proposed septic system and its leach lines would impact the historic oaks on the land.

Several other Mussey Grade residents voiced their concerns over fire safety issues. They argued that more campfires would add to an already risky fire area and noted that there was no evacuation plan developed by the Army.

RCPG member Steve Butler, a fire chief with 32 years of firefighting experience, rejected those ideas, noting that the water tank on site could fill up the equivalent of 500 fire trucks. Butler also said that the 100-foot clear zones around the buildings would allow a fire to blow through without spreading from vegetation to structures, leaving no need for an evacuation.

"I hope those of you on Mussey Grade create a fire safe perimeter around your house, so you won't have to evacuate and clog up the road," Butler said.

Mussey Grade is a two-lane, winding road with only one entry and exit.

Persuading others against the campground expansion was the idea of having a large commercial use occurring in a largely residential and environmentally sensitive area of Ramona.

"We're asked why are we against changing people's lives. And we're asked to keep an open mind," commented planner Fred Sproul, "but I'm not sure the Salvation Army promoters have kept an open mind when they think about the change they're going to make to the lives of the residents who live around there. They'll have to put up with...118,000 people a year. This is out of scale."

The next step for the Salvation Army is to see what county staff has to say about a draft of the Environmental Impact Report — the most stringent of environmental reviews — proponents submitted weeks ago. After the county makes its comments on the EIR draft, it will go back to the Ramona planning group during a 45-day public review period.

Earlier in the session, a motion to hold planning group comments on the project until the EIR is available failed to garner majority support.

In other business, the RCPG:

- Established a committee to review the Environmental Impact Report on a plan to manage agricultural preserve lands in the back country.
- Agreed to appeal county staff's approval of the final phase of the Holly Oaks Ranch housing development. The development's original map did not include a 52-foot road easement that had been graded before proper permits were obtained.
- Denied four separate proposals to install wireless communication facilities in Ramona.
- Requested the county to waive and reimburse fees related to building the Intermountain fire department's station on Highway 78 and Casner Road.

RAMONA COMMUNITY PLANNING GROUP
POST OFFICE BOX 803, RAMONA, CALIFORNIA 92065

November 9, 2000

To: San Diego Department of Planning and Land Use

Project Re: Salvation Army Conference Center / RCPG Action & Comments

DRAFT FINDINGS UNDER 7358 ON THE PROPOSED MASTER PLAN FOR THE SALVATION ARMY SIERRA DEL MAR DIVISIONAL CAMP AND CONFERENCE CENTRE

7358 FINDINGS REQUIRED

Before any use permit except those filed pursuant to Regional Land Use Policy 3.8 may be granted or modified, it shall be found:

a. That the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures, with consideration given to:

2. Harmony in scale, bulk, coverage and density;
3. The availability of public facilities, services and utilities;
4. The harmful effect, if any, upon desirable neighbourhood character;
5. The generation of traffic and the capacity and physical character of surrounding streets;
6. The suitability of the site for the type and intensity of use or development which is proposed; and
7. Any other relevant impact of the proposed use.

1. Harmony in scale, bulk, coverage and density

According to the Proposed Master Plan these structures would be built in the following scale:

Conference Component - average 10,350 square foot each (72,500 total square feet / 7 structures) now 57,000
Dining Facility - 24,000 square feet
Multi Purpose Building - 21,000 square feet
Staff Housing - 31,500 square feet (number of units unspecified in the text of the Master Plan)

On its face, the development outlined in the Proposed Master Plan is completely incompatible with the surrounding area regarding harmony in scale, bulk, coverage and density when compared with adjacent properties on the San Diego County Assessor's map 327-011, outlining land adjacent to and east of the Salvation Army site on Mussey Grade Road, and which shows 37 lots covering some 700 acres (approximately 18.9 acres per lot).

For example, the average size home in this area is 1,638.9 square feet (24,584 total square feet / 15 homes listed), according the Old Republic Title Company listing of the homes located in the area covered by the County Assessor's map. From the text of the Proposed Master Plan, there are at least 258,600 square feet planned for at least 42 buildings. This is the equivalent of 157.8 similar sized homes in the area (258,600 square feet divided by 1,639 square foot average home in the area). Yet, 157 homes would not be accommodated under the 18.9 average acres per lot in the area.
Regarding density of structures, the proposed 434.6 square feet per acre (258,600 square feet / 595 acres) is over 12 times more density than the 35.1 square feet per acre (24,584 total square feet over 700 acres).

It is also important to note that the current maximum overnight population of the site for the proposed expansion is 0.48 people per acre (284 people /595 acres), already five times more density than the surrounding area. Exceptions were already made with the current MUP was granted in 1970. An amendment to increase the intensity of land use even more is unacceptable.

2. The availability of public facilities, services and utilities

As it exists today, the public facility regarding the provisioning of water from the Ramona Municipal Water District (RMWD) is insufficient for the development.

Furthermore, according to the March 22, 2000, RMWD's Water System Analysis for the Salvation Army Campground, either an 8" or 10" diameter pipeline from Dos Picos Park Road to the intersection with the existing 6-inch diameter pipeline in Mussey Grade Road would be required to satisfy demand as well as fire flow. The trenching of Mussey Grade Road from the intersection of Dos Picos Park Road to the existing 6-inch diameter water line would damage ancient oak roots. According to the California Oak Foundation, trenching of roads is one of the major destructive actions, which claim thousands of California oaks annually. Therefore, the very provision of public facilities could destroy a major portion of the existing oak canopy, which is unacceptable to the Ramona Community Planning Group.

Mussey Grade Road is a box canyon, a road with one entrance/exit. The addition of hundreds of people in a densely populated facility along a high fire hazard box canyon is completely unacceptable without a second fire access to be used in case of emergency. To date, no such access has been required or located. Additionally, there are at present no evacuation plans for the site, including availability of on-site transportation. This is unacceptable to the Ramona Community Planning Group.

3. The harmful effect, if any, upon desirable neighbourhood character

Harmful and deleterious, unmitigatable effects include:

- Addition of traffic congestion;
- Addition of increased fire hazard in a recognized high fire hazard area in a box canyon;

- Potential destruction of some 100 ancient oaks and sycamores lining both sides of the present road through trenching for additional water line;
- Disruption of the serenity of the local neighbourhood, including light and noise pollution;
- Addition of the operation of a commercial development in a rural, residential neighbourhood; and
- Precedent-setting action on the part of the County of San Diego to allow such development to occur in rural, unincorporated areas.

4. The generation of traffic and the capacity and physical character of surrounding streets

According to the Notice of Preparation (NOP) of the Environmental Impact Report, dated March 16, 2000, under the Environmental Analysis Form document, listed at VI. Transportation/Circulation, up to 376 Average Daily Trips (ADTs) would be added to Mussey Grade Road, a quiet, dead end road servicing the immediate neighbourhood, including neighbourhood feeder roads such as Dos Picos Park Road. According to the NOP, the facility is planned for a capacity of 789 persons. The addition of hundreds of daily trips to Mussey Grade Road, an approximately 5-mile road bisected in 1943 by the San Vincente Reservoir, will be absolutely disruptive to the flow of traffic onto Mussey Grade from numerous side streets, impair access to and from Mussey Grade to State Highway 67, add unwanted congestion to a quiet, rural road, and increase traffic hazards to persons engaged in horse riding, bicycling, hiking, running and other roadside activities undertaken by Mussey Grade Road neighbourhood residents.

5. The suitability of the site of the type and intensity of use or development which is proposed

The proposed site is completely unsuitable for a commercial operation, which includes a large conference CENTRE, RV park, theatre, and other components not usually associated with the concept of a "campground". The site sits approximately two (2) miles above the second largest San Diego City drinking water reservoir, the San Vincente Reservoir. According to the NOP, and specifically under the Environmental Analysis Form, at I., the DPLU states that urban-type growth outside of designated urban areas has been restricted by County policy (Board's Policy I-78) with regard to the location of small wastewater treatment plants. Unless the Board of Supervisors makes an exception to this policy, package wastewater treatment plants cannot be used on the property due to its distance from the urban limit line of the unincorporated community of Ramona. The report states that, to date, only once exception in Valley CENTRE has been granted to this policy.

Therefore the use of a planned wastewater treatment plant is completely unsuitable for the development. Additionally, due to slope conditions and other constraints, the septic capacity may be extremely limited, rendering the site itself unsuitable for this type and intensity of use and development.

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6. Any other relevant impact of the proposed use

It was moved and approved by the RCPG on November 2, 2000 that based on the magnitude of the project, it is the recommendation of this group to deny the project outright with inclusion of all public comments, board members comments and finding in the minutes.

See attachments

For the above reasons, the Ramona Community Planning Group finds the project incompatible with the immediate neighbourhood and the overall rural community character of Ramona and repeats its request of July 2, 1999, that the County of San Diego deny any modification to the Major Use Permit 70-379W2.

***

Sincerely,

Brenda Foreman

Brenda Foreman, Chair RCPG

pg 4 of 4

PROJECT NARRATIVE

PROPOSED MASTER PLAN

FOR

THE SALVATION ARMY
SIERRA DEL MAR
DIVISIONAL CAMP AND
RETREAT CENTER

MATALON

6.21.01

GARY L. PRYOR
DIRECTOR
(858) 694-2962

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
338 VIA VERA CRUZ - SUITE 201
SAN MARCOS, CA 92069-2020
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. - SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

November 16, 2001

The Salvation Army
Major David Hudson
825 Seventh Avenue
San Diego, CA 92101

RE: SALVATION ARMY DIVISIONAL CAMP AND RETREAT EIR; MUP 70-379W2; ER 98-14-023; SCH 2000031058; RESULTS OF ON-SITE BIOLOGY MEETING

Dear Sir:

The requested on-site meeting to discuss biological issues associated with your project took place on 11/14/01. Ms. Dickman and Mr. Solomon have prepared summaries of the meeting that include specific direction to project biologists concerning what is necessary to achieve an adequate submission for the Third Screencheck EIR. This letter is being sent via regular US Mail and by Fax.

The County issued a letter on October 8, 2001, which stated staff's concerns regarding the project, its impacts on biological resources and the adequacy of the EIR and technical appendices. Meetings were held between County staff and various representatives for the project on October 24, October 26 and November 13 to discuss the applicant's concerns regarding the October 8 letter, including issues that lacked resolution and disagreements between County staff and the project's technical consultants. As requested by the County, BRG Consulting submitted two maps (received via mail on November 9, 2001), one of which depicts projects impacts in relation to oak woodland habitat and the other which shows the development footprint along with the results of the wetland delineation. After reviewing these maps, County staff biologists Dawn Dickman and Brett Solomon met on-site with Melissa Booker (Merkel & Associates), Melanie Johnson (BRG Consulting) and Tamara Spear (CA Department of Fish and Game) on November 14, 2001, to field check the accuracy of the mapping and to view areas of the site where impacts to biological resources may occur.

The comments provided below are based on our review of the two maps submitted on November 9 and the site visit conducted on November 14. These comments are meant to provide resolution and clarification on certain issues that were discussed during the meetings referenced above. Unless stated otherwise, the next submittal of documents should reflect both the comments contained herein as well as those outlined in the October 8, 2001 letter. Please revise the relevant documents to reflect the following:

Comments from staff biologist and MSCP specialist, Dawn Dickman:

1. The analysis of indirect impacts to oak trees and oak woodland is based on the information presented on the Oak Buffer Impact Map. The assumptions used to generate this map are not entirely correct and should be revised. The resulting estimates of oak impacts should be also be revised accordingly based on the following:
    a. There has been a misunderstanding as to how to calculate the impacts to oak trees and oak woodlands. Staff has said that any oak trees/woodland that is present within 50 feet of disturbance must be considered impacted. Staff was only referring to significant and/or permanent ground disturbance that would have indirect impacts to the sensitive root systems of oaks, such as grading, paving, construction or trenching. Staff did not mean to imply that fire clearing caused impacts to trees up to 50 feet away from the boundaries of the clearing. Fire clearing is a direct impact to the habitat, but does not cause indirect impacts outside of its immediate boundary. As such, the analysis of impacts to oaks should be modified to eliminate the extra 50-foot of impacts outside of fire clearing areas.
    b. In several locations, existing buildings are shown within the 25 and 50 foot buffer areas. If an existing building is present, this project would not further impact those particular trees and these areas should be excluded from the identified impact zone (referred to on the map as buffers). Secondly, staff has previously stated (in our August 10, 2000 letter) that oaks located within areas that are currently heavily used by existing camp facilities may not be considered a biological resource and may be labeled as urban/developed. This would apply to those oak(s) that are within or immediately adjacent to developed areas and that have had their understory permanently disturbed, thereby lacking value as a true native biological habitat. The presence of oaks within these "urban/developed" areas should be noted both in the biological report and on the vegetation map, but they may be excluded from the actual oak woodland habitat. The possibility that this condition applies to some areas labeled oak woodland with existing buildings should be examined and the map changed where necessary.

2. It appears from the map and discussions with the project's consultants that the changes discussed above should cause a significant reduction in the current estimates of impacts. With that being considered and that many of the impacts to oaks will occur within sensitive oak riparian forest (both directly defined as

wetlands and those associated with a wetland resource), staff is not prepared to reduce the 50 foot impact zone for oaks as caused by various forms of ground disturbance. No information has been submitted showing that the project warrants a reduction of this standard requirement. The impact analysis should continue to consider impacts to oaks located up to 50 feet from all grading, road improvements, trenching for pipelines or septic, placement of structures or any type of impervious surface.

3. Instead of creating a separate Oak Buffer Impact Map for the next submittal, please incorporate the 50-foot zone of indirect impacts to oaks within the development footprint. While this map was necessary to illustrate to staff where the difference in buffer distances would occur, to separate out these impacts in the actual EIR would only be confusing during public review.

4. Staff has several concerns relating to the development footprint area as shown on both maps submitted to the County. Please revise the mapping and biological report to reflect the following regarding the areas labeled as "Project Development Footprint" and the resulting impact analysis:
    a. Some of the "bubbles" of development footprint areas are fairly close to one anther. Given the distance and lack of barriers, it is highly likely that campground visitors may venture between these buildings outside of access paths and/or roads. As staff stated in the October 8, 2001 letter, these development bubbles should be all encompassing using the worst-case scenario (as the County is required to analyze projects under CEQA). Unless significant barriers or distances exist between development bubbles, the area between these bubbles must be included within the actual footprint and considered impacted. In particular, several smaller areas of development are shown in the central portion of the plot plan. After visiting the site, it is obvious to staff based on the distance, vegetation and topography, that these bubbles are not truly disconnected and the probability of activity between the buildings is high. Please revise the footprint map to include the areas between many of these smaller bubbles. Please note that staff has already provided some guidance in this matter to the consultants during the site visit.
    b. While the current proposed project is a major use permit modification, which means only changes to the existing conditions should be analyzed, all of the uses covered by this major use permit must be accounted for in the proposed development footprint area in order for staff to fully analyze impacts. To delineate current project impacts versus existing conditions, areas where existing uses will continue without any increase in impacts by the proposed modification should be shown in a different color or marking on the map. All development on this campsite, both existing and proposed, must be shown by some marking on the map as being included in the development footprint area.
    c. Any area that is shown as an existing condition in the development footprint areas must be addressed in the text of the report. Justification

should be provided as to how the current proposed project would not increase direct or indirect impacts in these areas. This includes, but is not limited to, a discussion of the types and intensity of uses, road or other improvements, new buildings and additional fire clearing.

d. Any area on the map not included within the development footprint area or a dedicated open space easement must be labeled "Not A Part". Except for passive use of the trails, the major use permit will not allow or authorize any uses within the areas labeled "Not A Part". No direct impacts will be considered in these areas, but indirect impacts from the use of trails should be discussed in the report.

5. Please include in the EIR/technical appendices at least one copy of the complete biological resources map with an overlay of the development footprint areas, open space easements, areas considered "Not A Part" and a current project plot plan. This may make the biological resources map confusing. Thus, separate maps may also be needed with varying levels of information in addition to the one that shows everything at once.

6. Please submit the most recent letter from the fire department detailing the extent and location of all required fire clearing. Any requirements included in the letter must be incorporated into the project design as part of the development footprint area.

Comments from staff biologist (specializing in wetlands) Brett Solomon:

A review of the Jurisdictional Wetland Delineation and discussion within the Draft EIR and subsequent site was done to verify the accuracy of the identification and delineated boundaries of County, state and federal jurisdictional wetlands and waters of the U.S. completed by Merkel and Associates. The Jurisdictional Wetland Delineation was completed through the "Routine Method" pursuant to the *Army Corps of Engineers (ACOE) 1987 Wetland Delineation Manual.* The jurisdictional wetlands and waters of the U.S. discussion includes the ACOE jurisdiction, California Department of Fish and Game (CDFG) jurisdiction, and a brief discussion of the County of San Diego Resource Protection Ordinance (RPO) that defines and regulates County wetland resources. The Jurisdictional Wetland Delineation and associated discussions are well written and have provided technical information with respect to identifying and delineating County, state and federal jurisdictional wetlands and waters of the U.S. However, pursuant to the site visit conducted November 14, 2001 and review of the jurisdictional technical data sheets, County staff has specific concerns about the methods of delineating jurisdictional boundaries, adequately addressing wetland buffers, and avoiding impacts to wetlands, riparian habitat, and waters of the U.S. Please review the following staff comments and concerns requesting further revisions and potentially expansion of the completed jurisdictional wetland delineation:

1. During the site visit on November 14, 2001, many of the potential impact areas that support wetlands and waters of the U.S., as well as riparian resources were

carefully walked to observe the presence of hydrophytic vegetation, channelized features, hydrology indicators and low lying areas that had the potential to meet the criteria of jurisdictional [County, state, and/or federal] wetlands or waters of the U.S. A substantial amount of time was spent in the northeastern portion of the project site where West Branch enters onto the property and from the north and meanders to the west. These areas are critical since there is an existing road that will require improvements immediately adjacent to wetlands and within the riparian canopy, and a proposed road to bisect the riparian corridor to access a proposed conference center. Although the technical data sheets were relatively accurate for the data points taken (DP10 and DP 11), these areas were confined to the actual active channel or immediately adjacent to the active channel in a relatively small and area of study. County staff raised concerns that it did not appear that transects were completed to accurately identify wetlands and upland habitats needed clearly delineate the line where all three parameters (hydrophytic vegetation, hydric soils and hydrology), pursuant to the ACOE, were no longer present. In addition, there were concerns that the wetland delineation did not accurately identify where any one of the three parameters were still present, pursuant to RPO and CDFG jurisdiction. This was observed two distinct locations where the access road to the conference center is currently proposed. In one location there was a low-lying area that had a stand of sycamores (hydrophytic vegetation) that would likely be classified, at minimum, as RPO and CDFG jurisdictional wetlands. Nowhere within this area was data points completed, and it is currently shown as riparian habitat. In the second location, there was an additional grouping of sycamores that was at the base of a slope within the proximity of the access road that is likely a seep or associated with a drainage near by that too is likely wetlands and also currently mapped as riparian habitat.

The above noted examples are critical because there is currently opposition by Merkel and Associated, justifiably so, that riparian habitats do not meet any of the criteria that define wetlands or waters of the U.S. within the jurisdiction of the County, CDFG and ACOE that would require creation of wetlands pursuant to the no-net-loss of wetlands. County staff generally agrees that riparian habitats do not meet the "wetlands" definition within RPO that would require creation, as opposed to preservation of resources. Therefore, since there is much debate over these issues, County staff requires that a more comprehensive wetland delineation be completed to more accurately define jurisdictional boundaries for the County, CDFG and ACOE within areas that will have direct and indirect impacts, as well as within the vicinity of uses proposed for the project under the Major Use Permit for the camp and retreat. The comprehensive method for the wetland delineation should include more data points, especially within specific and direct areas of impact. Transects completed should clearly delineate where the three parameters are no longer present (pursuant to the ACOE 1987 Manual), and where there are no longer any one of the three parameters present (pursuant to the RPO and CDFG 1603 Fish and Game Code policies). The rationale for this increase in expanded delineations is noted above, as well as concerns that County staff had about where the hydrology parameter is no

longer present. When inquired about in the field, there was not a clear understanding of what the water table levels were or significant inundation events, which not fully addressed on the technical data sheets. This is critical in determining the extent of RPO wetlands on the project site.

2. Please revise the currently submitted technical data sheets for the wetland delineations. Within these data sheets there are errors including inconsistencies where sycamore trees (*Platanus racemosa*) listed as FACU and FACW. The correct hydrophytic species classification is FACW.
3. As previously stated in the County Comment Letter dated October 8, 2001, the County RPO does not allow for impacts to wetlands other then for very limited purposes. The current design of the conference center and access road potentially impacting wetlands and wetland buffers do not appear to conform to RPO. To minimize wetlands impacts, County staff recommends the following:
    a. Relocation or removal of the conference center so that wetlands and wetland buffers, bisected by and immediately adjacent to the proposed access road, will not directly or indirectly impact portions of West Branch potentially compromising the functions and values of the overall riparian corridor.
    b. Minimize road improvements for the main access road that is currently located immediately adjacent to wetlands and within the riparian canopy. The areas of concern begin where the road enters onto the project site from Mussey Grade Road and continues west, and then southward within the riparian canopy and then adjacent wetlands. The access road then enters into wetlands and riparian habitats at the central eastern boundary of the project site (see location of DP 4), and is adjacent to wetlands and riparian habitats heading eastward (see location of DP 1, 5, and 6).
4. Please show the extent of all County defined RPO wetlands, updated from additional jurisdictional data points, on the Jurisdictional Wetland and Waterways, Figures 3a and 3b of the Technical Appendix B.
5. Impacts to County defined wetlands and wetland buffers pursuant to RPO [Article II, Section 16 (a-c) and 17], and riparian habitats pursuant to the County's Biological Mitigation Ordinance (BMO) [Attachment K and M] shall be mitigated according to the following:
    a. All impacts to County defined wetlands and wetland buffers shall be mitigated at a 3:1 ratio that includes a minimum of 1:1 creation and 2:1 enhancement to satisfy the no-net-loss of wetlands standards and goals.
    b. The sole exception to the 3:1 creation/enhancement ratio for impacts to wetlands shall be to the unvegetated drainages that meet RPO or non-non-wetland waters of the U.S. based on hydrology. The impacted wetlands shall be mitigated at a 2:1 ratio in the form of 1:1 creation and 1:1 enhancement within riparian and wetland habitats. In areas where unvegetated drainages are connected to wetlands that support hydrophytic vegetation, the unvegetated portions of the drainage shall be mitigated at a 2:1 ratio and the vegetated portions shall be mitigated at a 3:1 ratio through the above noted mitigation (creation and enhancement).
    c. All impacts to riparian habitats, predominantly southern coast live oak riparian forest, that do not have any one of the three wetland parameters pursuant to RPO, or are not a component of wetland buffers shall be mitigated at a 2:1 ratio with preservation pursuant to the BMO. The 2:1 ratio assumes that impacts will occur to and be mitigated within Biological Resource Core Areas (BRCAs).
    d. It shall be noted here that during the site visit, Tamara Spear from CDFG 1600 Division stated that generally CDFG requires 10:1 oak replacement for impacts to riparian habitats anywhere from drip line to drip line for the width of the riparian corridor. This is a form of creation above and beyond preservation, and there potentially will be creation of riparian habitat above the County required preservation, for areas that are not wetlands or wetland buffers.

6. In discussion with representatives from Merkel and Associates during the site visit, it was determined that the entire drainage (including both forks of the wetlands) that supports wetlands and riparian habitats at the central southwestern portion of the project site (see location of DP 1, 2, 3, 5, and 6) should be considered a project impact. The rational for this determination is based on the fact that there are relatively intensive uses within these areas where a greater majority of the facilities are proposed. Although it is discussed that trails may be signed to promote campers and people utilizing the camp and retreat from crossing the wetlands, it is highly likely that the increased uses within these areas are going to create direct and indirect impacts that would not allow for long-term viability of habitat through designation or dedication of open space. All impacts to these habitats, including wetland buffers, shall be mitigated pursuant to Comment 5 above.
7. Please revise the width of the wetland buffers shown on Figure 5a and 5b to be consistent with the requested additional delineations that is likely to broaden the width of jurisdictional wetlands, especially County jurisdictional wetlands. All wetland buffers should be determined by the following calculation and should be placed on both sides of the defined wetland boundaries. The sole exceptions to the wetland buffer calculation shall occur in areas where there are unvegetated drainages, and the wetland buffer calculation is less than 25 feet, a minimum 25 foot wetland buffer shall be placed on both sides of the wetland boundaries. In areas where the wetlands support hydrophytic vegetation and the wetland buffer calculation is less than 50 feet, a 50-foot minimum wetland buffer shall be placed on either side of the wetland boundaries. This is critical since any impacts to wetlands or wetland buffers shall be mitigated through creation and enhancement consistent with Comment 5 above.
   $0.25y(x+1)$ = minimum width of buffer (ft)
   y = Average width of wetland (ft)
   x = # of the following questions answered "yes"
   1. Does the wetland support native hydrophytic vegetation?

2. Does the wetland act as a wildlife corridor?
3. Does the wetland support any sensitive species?

8. Impacts to wetlands, wetland buffers and riparian habitats shall be considered impacted if direct or indirect impacts occur from the proposed project. Indirect impacts include, but are not limited to, increases in noise levels, traffic increase from both automobiles and human activities, and lighting from increased traffic on roads. If there are existing uses within wetlands, wetland buffers and riparian habitats that will not have significant increases in uses, above and beyond existing uses, then these areas will not be considered project impact. The determination that significant increases above existing uses will require substantial evidence that the proposed project will not increase the intensity of usage within these areas. All direct and indirect impacts to wetlands, wetland buffers and riparian habitats shall be mitigated in accordance with Comment 5 above.
9. The project shall be required to dedicate biological open space easements for portions of riparian, wetlands and wetland buffers for both direct and indirect impacts associated with the proposed project. These areas include portions of the wetlands, wetland buffers and riparian corridors where creation and enhancement will occur pursuant to mitigation for impacts to wetlands and wetlands buffers. All other habitats that are not preserved in biological open space for mitigation purposes shall be designated as open space to identify avoidance of these habitats. All sensitive habitat lands not in dedicated or designated open space shall be considered project impact.
10. During the site visit, County staff visited the location of the "refurbished ponds" currently shown as non-wetland waters of the U.S. with sparse areas of mule fat scrub and southern willow scrub. These "refurbished ponds" are currently in a very degraded state where repeated activities of movement and placement of fill has occurred. Due to the current state of the proposed wetland creation and enhancement mitigation areas, and the proposed further utilization of trails immediately adjacent to the areas, County staff recommends that all creation and enhancement for mitigation of impacts to wetlands and wetland buffer occur within the wetlands and riparian habitats at the northern portion of the project site (West Branch and tributaries) beyond areas that have proposed uses. The rational for this determination is based on the fact that the "refurbished ponds" are likely to have limited long term viability with the proposed continued uses immediately adjacent to these areas. Furthermore, by creating and enhancing wetlands and riparian habitats in the northern portion of the project site, the project will be expanding habitats identified as BRCAs that are considered wildlife dispersal corridors.
11. Please quantify all impacts to wetlands, wetland buffers and riparian habitats that will occur as a result of the creation and enhancement of wetlands required as mitigation for impacts to the habitats from the proposed project.

If you have any questions regarding this letter or the direction it contains, please contact me at (858) 694-2981 or by e-mail at grussepl@co.san-diego.ca.us.

Sincerely,

Dr. Glenn Russell, Environmental Coordinator
Department of Planning and Land Use

cc: Kiersten Giugno, Senior Project Manager, BRG Consulting, Inc., 1550 Hotel Circle Drive North, Suite 320, San Diego, CA 92108-2909[NOTE:2]
Michael Matalon, Matalon Architecture and Planning, 7596 Eaps Ave. Suite 120, S.D. CA 92101
Mathew A. Peterson, Peterson & Price, Union Bank of California Building, 530 "B" Street, Suite 1700, San Diego, CA 92101-4454
Diane Conklin, Mussey Grade Road Alliance, Post Office Box 683, Ramona, CA 92065
Joseph Farace, Project Manager, Current Planning, Department of Public Planning and Land Use, M.S. O650
Ken Brazell, Project Manager, Department of Public Works, M.S. O336
John Gibson, Chief, Resource Planning, Department of Public Planning and Land Use, M.S. O650
John Peterson, CEQA Regulatory Manager, Department of Planning and Land Use, M.S. O650
Mark Mead, County Counsel
File

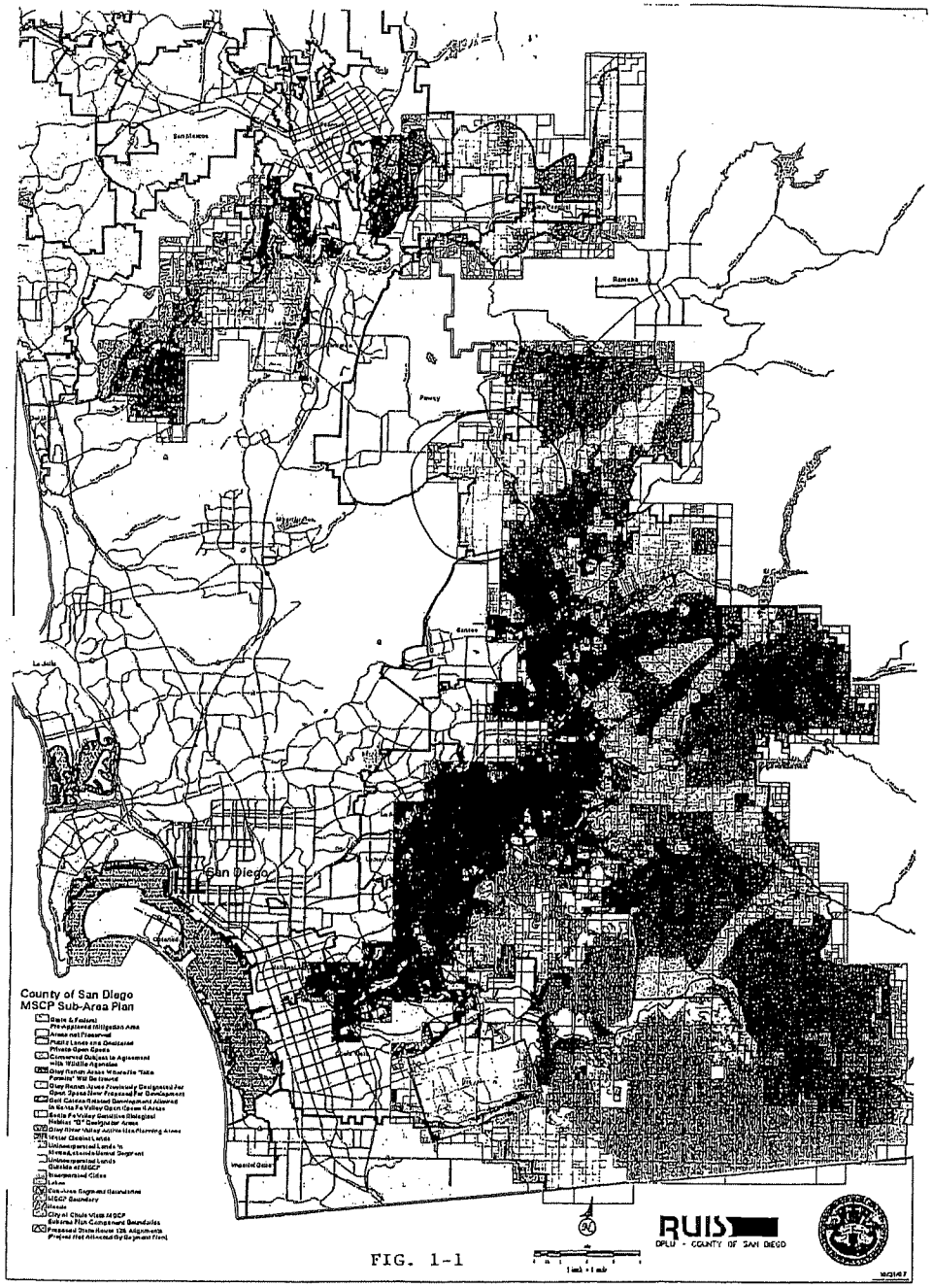

FIG. 1-1

interpretation providing that the Negative Declaration may be approved at a later time so long as the work for completing the Negative Declaration has been accomplished within the 105-day period. Public Resources Code Section 21157.5 requires that a negative declaration or mitigated negative declaration be adopted within 180 days from the date the project application was accepted as complete.

15108. Completion and Certification of EIR

With a private project, the Lead Agency shall complete and certify the final EIR as provided in Section 15090 within one year after the date when the Lead Agency accepted the application as complete. Lead Agency procedures may provide that the one-year time limit may be extended once for a period of not more than 90 days upon consent of the Lead Agency and the applicant.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: Sections 21100.2 and 21151.5, Public Resources Code; Government Code Section 65950.

Discussion: This section identifies the requirement to complete and certify an EIR within one year from the date when the application is received as complete, and combines the statutory one-year time limit in CEQA with the requirement in the Government Code that the one year period be measured from the date on which the application is accepted as complete. Sections 21100.2 and 21151.5 of CEQA allow a reasonable extension to the one-year time limit with the consent of the applicant. Section 15108 adds the interpretation providing that this extension should not exceed 90 days. This interpretation is added to make the extension match the limit on the extension allowed for the one-year time limit for processing permits for development projects under Government Code Section 65957. Because most development projects will be subject to time limits under both the Government Code and CEQA, the time limits should be as similar as possible to avoid conflicts and confusion.

15109. Suspension of Time Periods

An unreasonable delay by an applicant in meeting requests by the Lead Agency necessary for the preparation of a Negative Declaration or an EIR shall suspend the running of the time periods described in Sections 15107 and 15108 for the period of the unreasonable delay. Alternatively, an agency may disapprove a project application where there is unreasonable delay in meeting requests. The agency may allow a renewed application to start at the same point in the process where the application was when it was disapproved.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: Sections 21100.2 and 21151.5, Public Resources Code; *Carmel Valley View, Ltd. v. Maggini*, 91 Cal. App. 3d 318.

Discussion: This section is an interpretation responding to the question of what happens to the Lead Agency's one-year time limit if the applicant unreasonably delays providing information that was requested by the Lead Agency. The problem of unreasonable delays has plagued many agencies and has led to disputes over whether a project has been approved by operation of law. The section is necessary to resolve the disputes and to avoid the need to litigate the same. This interpretation is consistent with the court decision in *Carmel Valley View, Ltd. v. Maggini*, cited in the note.

The section also identifies the option of disapproving the project in response to unreasonable delays. The section also validates the use of a "disapproval without prejudice" that is used by some agencies. This approach allows a new application for a disapproved project to start at the same point in the process where it was when disapproved. Following this approach, an agency can avoid the time and expense for early steps in the process that would not be necessary for a project that had been partially reviewed before.

15110. Projects with Federal Involvement

(a) At the request of an applicant, the Lead Agency may waive the one-year time limit for completing and certifying a final EIR or the 105-day period for completing a Negative Declaration if:

(1) The project will be subject to CEQA and to the National Environmental Policy Act,

(2) Additional time will be required to prepare a combined EIR-EIS or combined Negative Declaration-Finding of No Significant Impact as provided in Section 15221, and

(3) The time required to prepare the combined document will be shorter than the time required to prepare the documents separately.

(b) The time limits for taking final action on a permit for a development project may also be waived where a combined EIR-EIS will be prepared.

(c) The time limits for processing permits for development projects under Government Code Sections 65950-65960 shall not apply if federal statutes or regulations require time schedules which exceed the state time limits. In this event, any state agencies involved shall make a final decision on the project within the federal time limits.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: Sections 21083.6 and 21083.7, Public Resources Code; Sections 65951 and 65954, Government Code; Public Law 91-190 as amended, 42 U.S.C.A. 4321-4347.

Discussion: This section implements the statutory provision allowing a waiver of CEQA time limits where the project will be subject to NEPA as well as CEQA. The regulation supplements the statutory provision by applying this principle to situations where a Negative Declaration under CEQA is prepared jointly with a Finding of No Significant Impact under NEPA. This approach is consistent with the principle contained in the statutory section but applies in a situation not mentioned by the statute. The section adds a requirement that any state agency involved make a final decision on the project within the federal time limit if that period is longer than the state time limit. This provision is necessary to avoid an interpretation that would provide that no time limits would apply to a state agency at all under this section. The section follows the general policy of CEQA and the Government Code of requiring action on development projects to be completed within a definite period of time.

15111. Projects with Short Time Periods forApproval

(a) A few statutes or ordinances require agencies to make decisions on permits within time limits that are so short that review of the project under CEQA would be difficult. To enable the Lead Agency to comply with both the permit statute

preparation. This limit may be extended in the face of compelling circumstances, with the approval of the project applicant.

15103. Response to Notice of Preparation

Responsible Agencies and Trustee Agencies shall provide a response to a Notice of Preparation to the Lead Agency within 30 days after receipt of the notice. If a Responsible Agency fails to reply within the 30 days with either a response or a well justified request for additional time, the Lead Agency may assume that the Responsible Agency has no response to make and may ignore a late response.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: Sections 21080.4, Public Resources Code.

Discussion: This section identifies the statutory requirement for Responsible Agencies and Trustee Agencies to respond to a Notice of Preparation within 30 days after receiving the notice. The time period is supplemented by an interpretation allowing the Lead Agency to disregard late responses. The sanction on disregarding late responses is necessary to provide meaning to the time limit.

15104. Convening of Meetings

The Lead Agency shall convene a meeting with agency representatives to discuss the scope and content of the environmental information a Responsible Agency will need in the EIR as soon as possible but no later than 30 days after receiving a request for the meeting. The meeting may be requested by the Lead Agency, a Responsible Agency, a Trustee Agency, or by the project applicant.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: Section 21080.4, Public Resources Code.

Discussion: This section identifies the requirement for convening a meeting to discuss the contents of a draft EIR being prepared by a Lead Agency where such a meeting has been requested. This requirement is also statutory. This requirement is presented in the Guidelines in the logical sequence with other time limits. In this way, people implementing the law are likely to be made aware of this requirement and comply with it.

15105. Public Review Period for a Draft EIR or a Proposed Negative Declaration or Mitigated Negative Declaration

(a) The public review period for a draft EIR ~~should~~ shall not be less than 30 days nor should it be longer than ~~90~~ 60 days except under unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse.

(b) The public review period for a proposed negative declaration or mitigated negative declaration shall be ~~a reasonable period of time sufficient to allow members of the public to respond to the proposed finding before the Negative Declaration is approved~~ not less than 20 days. When a proposed negative declaration or mitigated negative declaration is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 30 days, unless a shorter period, not less than 20 days, is approved by the State Clearinghouse.

(c) If a draft EIR or proposed negative declaration or mitigated negative declaration has been submitted to the State Clearinghouse for review by state agencies, the public review period shall be at least as long as the review period established by the State Clearinghouse.

(d) A shortened Clearinghouse review period may be granted in accordance with the provisions of Appendix L and the following principles:

(1) A shortened review shall not be granted for any proposed project of statewide, areawide, or regional environmental significance.

(2) Requests for shortened review periods shall be submitted to the Clearinghouse in writing by the decision-making body of the lead agency, or a representative authorized by ordinance, resolution, or delegation of the decision-making body.

(3) The lead agency has contacted responsible and trustee agencies and they have agreed to the shortened review period.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: ~~Section~~ Sections 21091 and 21092, Public Resources Code; *People v. County of Kern* 39 Cal.App.3d 830.

Discussion: The discussion of public review period brings together requirements from a number of different articles in the Guidelines. Both this section and Section 15106 are purely regulatory in origin. They spell out the minimum and maximum review periods under CEQA as an effort to balance the ability of the public to respond within relatively short periods against the interests of applicants and public agencies in moving expeditiously in order to reach an ultimate decision on the project. This discussion applies equally to Section 15106.

Refer to the discussions under Sections 15073 and 15087 for the statutory requirements for minimum public review periods. With specific exceptions, the review period for an EIR shall be 45 days when submitted to the State Clearinghouse and 30 days when subject to local review only. The review period for a Negative Declaration shall be 30 days when submitted to the State Clearinghouse and 20 days otherwise, with certain exceptions. This section also specifies the circumstances under which OPR may grant a shortened review period for negative declarations and EIRs which are submitted to the State Clearinghouse.

15106. [Deleted]

15107. Completion of Negative Declaration

With a private project, the Negative Declaration must be completed and ready for approval within 105 days from the date when the Lead Agency accepted the application as complete. The Negative Declaration may be approved at a later time when the permit or other entitlement is approved.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code; Reference: Sections 21100.2 and 21151.5, Public Resources Code.

Discussion: This section combines statutory and regulatory requirements. The 105-day period for completing a Negative Declaration applies only to private projects as noted in the section. This requirement is statutory. The Guidelines add the

2/14

MUSSEY GRADE ROAD ALLIANCE
P.O. B. 683
RAMONA, CALIFORNIA 92065

June 5, 2001

Supervisor Dianne Jacob
Second District
1600 Pacific Highway
San Diego, CA

BY FAX

Re: Salvation Army

Dear Supervisor Jacob:

Please see the attached letter, received this morning by the Mussey Grade Road Alliance.

The Alliance, composed of 100 families living along historic Mussey Grade Road, is deeply disturbed by the arrangements for re-submittal made in this letter. We see these arrangements as contradictory to the Department of Planning and Land Use's (DPLU) previous determinations concerning the processing of this project, as evidenced by the list of complaints of the project initiated by DPLU and attached here. We are appalled that the DPLU, with the advice of County Counsel, is seemingly allowing the Army to ignore the Department's previous determination that the Army withdraw its project, as evidenced by the DPLU's own letter to the applicant requesting withdrawal, and attached here. The arrangements suggested by the Army's counsel also allow the Salvation Army to disregard the DPLU's own deadlines for the California Environmental Quality Act (CEQA) processing of the Army's current application, discussed by the Deputy CAO during the April 24th Board meeting, and recorded on video tape.

Instead, as this letter by Peterson & Price demonstrates, the Department, on behalf of the County, is treating the Salvation Army differently from the norm and is cooperating with the Army on a re-submittal schedule without insisting on a proper withdrawal of the Army's current application from the process, as required by the Department.

We want the Army to properly withdraw its current application and we want your help in securing that withdrawal.

As you know, we appeared before the Board of Supervisors on April 25th, demanding the DPLU send the Army a withdrawal letter on the project, which the DPLU had already determined to send. We appeared before the Board because we learned that

the DPLU's letter had been delayed due to the intervention of the Army's lawyer, Mat Peterson, with the DPLU Director Gary Pryor. You said at that time that our message was loud and clear and suggested we meet with the Director and a member of your staff.

As you also know, the Army finally received the DPLU's letter dated April 26th requesting the Army's withdrawal. In that letter, attached, it is written that, **"Given the level of redesign necessary, the Department has determined that it is appropriate for you to withdraw your current application and resubmit a new application when the new project design and description have been completed. If you choose not to withdraw your current application, the Department will take your application forward to an upcoming Planning Commission hearing with a recommendation that the application be denied."**

As you also know, the Department has received a flawed withdrawal letter written by Mat Peterson, dated May 11th. The Army's withdrawal letter presents conditions for the withdrawal and we were told by the DPLU that the Department has determined, along with County Counsel, that the letter is unsatisfactory and has not been accepted by the Department. Rather than insist that the Army submit a proper and fully satisfactory withdrawal letter, as would be required of any other applicant, we understand now that the DPLU, with the legal advice of County Counsel, is making other arrangements with the Army, arrangements that directly contradict the DPLU's previously written statements and the Director's actions.

For example, following your suggestion, we met with the Director on May 3rd and during our meeting with him Mr. Pryor stated to the Mussey Grade Road Alliance (MGRA) Steering Committee members present that if the Army did not satisfactorily withdraw, the DPLU would take the matter to the County Planning Commission, accompanied by a Department recommendation for denial. On May 22nd, after DPLU staff apprised us that the Department was waiting for a new project submittal, rather than insisting on the withdrawal of the project, we faxed the Director a letter of support for the Department's request for withdrawal, and copied you, attached here. We faxed you a copy because we understood that you were meeting with Gary Pryor at that time.

On May 31st, the MGRA met with your Planning and Land Use Policy Advisor Darren Gretler in your offices. This is the same day the attached letter of Mat Petersen to the Director outlining the new schedule was written. At that time, we expressed to Darren our dismay with the lack of progress on the Army's withdrawal. He stated that he was informed by the DPLU that the Department would take the Army forward for denial to the Commission, and said he would contact the DPLU to clarify the situation. He promised to re-contact us. He attempted to inform himself and was unsuccessful last Friday, June 1st. Today, he passed a message to us that he still does not have the information, and therefore we are sending you this fax.

We request that you, personally, look into this matter. We are disappointed that the DPLU was not able to inform Mr. Gretler of the attached letter. We are dismayed that the process at the Department is not working rationally and consistently. We are not addressing at this time any substantive matter concerning the project's merits. Rather, we are addressing the process alone. In that process, we are determined to support the DPLU's withdrawal request. We believe any other course of action sets a terrible precedent for the County.

Please contact us as soon as possible to let us know what you have learned and your own opinion of the matter, and at least prior to the next Land Use meeting of the Board. We look forward to hearing from you and thank you in advance for your efforts.

Sincerely,

Diane Conklin

Diane Conklin
Spokesperson

Attachments

cc: Gary Pryor, Director, DPLU
Darren Gretler, Planning and Land Use Policy Advisor

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A PROFESSIONAL CORPORATION
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EDWARD F. WHITTLER
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LARRY N. MURNANE
CHRISTOPHER J. CONNOLLY
KELLY A. GRALEWSKI
VICTORIA E. ADAMS
ERIC J. PROSSER

OF COUNSEL
PAUL A. PETERSON

Carlsbad Office
703 Palomar Airport Road
Suite 200
Carlsbad, California 92009-1042
Telephone (760) 929-1520
Fax (760) 929-2206

File No.
5492.001
VIA FACSIMILE & U.S. MAIL

May 31, 2001

Mr. Gary L. Pryor, Director
Department of Planning & Land Use
County of San Diego
5201 Ruffin Rd., Ste. B
San Diego, CA 92123-1666

Re: Salvation Army Sierra Del Mar Divisional Camp and Retreat, Ramona
Major Use Permit Amendment, Specific Plan, & EIR

Dear Gary:

In talking with Bill Taylor, Esq., he indicated that you would like to receive a letter from us detailing our client's plan for resubmittal of the above-referenced project.

As I indicated to Bill, the Consultant Team is still working at a feverish pace to accomplish a resubmittal on a timely basis. In this regard, we will be able to submit on or before June 22, 2001 the following: the revised project (with all site plans), a phasing plan, individual camp component plans, building plans and elevations, a conceptual grading plan, preliminary drainage plan, landscaping, lighting and mechanical plans. Following that, we would anticipate resubmitting the entire text of the Specific Plan and the Second Screen Check Draft EIR by no later than September 22, 2001. Right now, the Consultant Team believes that they will be able to beat that schedule and perhaps do the full resubmittal in the later part of August 2001.

Mr. Gary L. Pryor, Director
Department of Planning & Land Use
County of San Diego
May 31, 2001
Page 2

Please be advised that Kiersten Giugno at BRG is now taking over as the Project Manager. As you know, she is extremely familiar with the County's requirements and processing schedules.

We appreciate your involvement in ensuring that this project moves through the system in a timely fashion.

Sincerely,

PETERSON & PRICE
A Professional Corporation

Matthew A. Peterson

cc: Bill Taylor, Esq., County Counsel
Kiersten Giugno, Project Manager, BRG Consulting, Inc.
Michael B. Matalon, AIA, MATALON Architecture & Planning
David Hudson, Major, Divisional Secretary, The Salvation Army
(ALL VIA FAX)

SALVATION ARMY DIVISIONAL CAMP AND RETREAT MAJOR USE PERMIT; MUP70-379W[2] TIME LINE

Total Processing Time since applicant submitted application- 128 weeks

Extensions- A total of five extensions have been requested and granted for an additional 45 weeks of processing time beyond the standard timeline.

The requested but not granted 6th extension would be for an additional 21 weeks.

Studies- As of the last submittal, the following technical sections of the Draft EIR were incomplete and required revision:

Traffic
Visual
Air Quality
Biology
Noise
Specific Plan
Cumulative Impacts
Hazards

The following technical sections of the draft EIR were largely complete and required no revisions or only minor revisions:

Cultural resources
Geology and Soils
Geotechnical and Water Resources

APPLICATION PROCESSING TIMELINE

August 20, 1998	Application Submitted by Applicant
October 16, 1998	Scoping Letter Issued by DPLU
January 19, 1999	Due Date for Extended Studies Requested by DPLU
January 6, 1999	1st **Extension** Requested by Applicant Until 4/1/99
March 31, 1999	2nd **Extension** Requested by Applicant Until 5/1/99
April 28, 1999	3rd **Extension** Requested by Applicant Until 6/30/99
June 11, 1999	1st Iteration Extended Studies Submitted by Applicant

August 16, 1999	1st Iteration Studies Reviewed by DPLU

NOTE: Resource Protection Ordinance Wetlands Delineation Requested in this letter

September 30, 1999	Due Date for 2nd Iteration Extended Studies
October 11, 1999	1st Iteration Comm. Character Study Reviewed by DPLU
March 16, 2000	DPLU Issues Notice of Preparation for EIR
June 19, 2000	1st Screencheck EIR submitted by Applicant
August 16, 2000	1st Screencheck EIR Reviewed by DPLU
October 2, 2000	2nd Screencheck EIR due
September 27, 2000	4th **Extension** Requested by Applicant Until 1/15/01
October 10, 2000	Specific Plan Text Submitted by Applicant
November 13, 2000	Specific Plan Text Reviewed by DPLU
January 16, 2001	5th **Extension** Requested by Applicant Until 4/13/01
April 13, 2001	6th **Extension** requested by Applicant Until 9/9/01
NOTE	**6th Extension Not Granted** **DPLU Requests Applicant to Withdraw Application, Redesign Project, and Resubmit New Application**

9/14

GARY L. PRYOR
DIRECTOR
(858) 694-2962

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

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SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. - SIXTH FLOOR
EL CAJON, CA 92020-3812
(619) 441-4030

April 26, 2001

Mr. Matthew A. Peterson Esq.
Peterson & Price
Union Bank Building
530 "B" Street, Suite 1700
San Diego, CA 92101-4454

RE: P70-379W^2, Salvation Army Divisional Camp;
DENIAL OF DUE DATE EXTENSION

Dear Mr. Peterson:

The Department has received your request for a due date extension to September 10, 2001 for submittal of information requested in the DPLU Screen Check DEIR Letter dated August 16, 2001. After reviewing your request and the circumstances of your project, the Director hereby denies the extension request. In summary, the rationale for the denial of your request is as follows:

Your application was originally submitted on August 20, 1998. Since that date, you have requested and been granted five extensions, some of which were several months long. You are now requesting a sixth extension of five months to conduct a significant redesign of the project. Given the level of redesign necessary, the Department has determined that it is appropriate for you to withdraw your current application and resubmit a new application when the new project design and description have been completed. If you choose not to withdraw your current application, the Department will take your application forward to an upcoming Planning Commission hearing with a recommendation that the application be denied.

Therefore, the Department staff will be moving forward with a recommendation of denial of your project unless a written project withdrawal request is received from the applicant by **May 11, 2001.** If a withdrawal request is not submitted, the Department will initiate the documentation (and associated charges) to prepare your project for decision/hearing with a recommendation for denial.

10/14

If you have questions in regard to this decision or withdrawing your project, please contact me at (858) 694-3690 or by e-mail at jfaracpl@co.san-diego.ca.us.

Sincerely,

JOSEPH FARACE, Project Manager
Current Planning

JF:GR

Attachment

cc: The Salvation Army, 2320 5th Avenue, San Diego, CA 92101
Sean Cardenas, BRG Consulting, Inc., 304 Ivy Street, San Diego, CA 92101
Michael B. Matalon, Matalon Architecture & Planning, 7596 Eads Avenue #120, La Jolla, CA 92037
Kenneth Brazell, Project Manager, Department of Public Works, M.S. O336
Susan Porter, Regional Planner, Department of Planning and Land Use, M.S. O650
John Peterson, Groundwater Geologist, Department of Planning and Land Use, M.S. O650
Glenn Russell, Project Analyst, Department of Planning and Land Use, M.S. O650

(12/14) 2/4

MUSSEY GRADE ROAD ALLIANCE
P.O. Box 683
Ramona, California 92065
(760) 787 0794

May 22, 2001 **BY FAX**

Mr. Gary Pryor
Director
Department of Planning and Land Use
County of San Diego

Re: Salvation Army Sierra del Mar Camp Project on Mussey Grade Road

Dear Mr. Pryor:

I am writing to you on behalf of the Mussey Grade Road Alliance, a grassroots citizens group organized to protect and preserve historic Mussey Grade Road.

As the spokesperson for the Alliance, I am authorized to inform you that the members of the Mussey Grade Road Alliance completely support the Department's efforts to secure a proper withdrawal letter from the Salvation Army. If no such letter is forthcoming, the Alliance also supports the Department's response to take the project forward for denial at the Planning Commission and the County Board of Supervisors.

Furthermore, the Alliance supports the Department's not entertaining any new project of the Salvation Army on Mussey Grade Road until such a withdrawal letter, which satisfies the Department, has been received by the Department.

Sincerely,

Diane Conklin

Diane Conklin
Spokesperson
Mussey Grade Road Alliance

cc: Supervisor Dianne Jacob

(13/14) 3/4

EDWARD F. WHITTLER
MARSHAL A. SCARR
MATTHEW A. PETERSON
LARRY N. MURNANE
CHRISTOPHER J. CONNOLLY
KELLY A. GRALEWSKI
VICTORIA E. ADAMS
ERIC J. PROSSER

OF COUNSEL
PAUL A. PETERSON

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Telephone (760) 929-1920
Fax (760) 929-2205

File No.
5492.001
Via Fax & U.S. Mail

May 11, 2001

Mr. Joseph Farace, Project Manager
Current Planning
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Re: P70-379W² Salvation Army Divisional Camp
Request of Extension

Dear Joe:

We are in receipt of your letter dated April 26, 2001. As you can imagine, our client is extremely disappointed that the Department of Planning and Land Use denied its request for an extension of time to resubmit the 2nd Screen Check Draft EIR and Specific Plan.

Since proceeding with a hearing at the Planning Commission would be a waste of the County's and our client's time, money and resources, we, on behalf of our client, under protest, hereby withdraw our client's current application. In this regard, our client reserves its right to assert all of its legal and equitable rights and remedies that it may have concerning the County's denial of the extension request. Further, our client also reserves the right to assert "pipeline" status in the event that the County proceeds with

(14/14) 4/4

any legislation or administrative changes which would adversely affect our client's ability to gain the approval of its proposed project.

Sincerely,

PETERSON & PRICE
A Professional Corporation

Matthew A. Peterson

cc: Gary Pryor, Director
D. Seán Cárdenas, RPA, Senior Project Manager, BRG Consulting, Inc.
Michael B. Matalon, AIA, MATALON Architecture & Planning
Major David Hudson, Divisional Secretary, The Salvation Army

GARY L. PRYOR
DIRECTOR
(858) 694-2962

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE
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EL CAJON, CA 92020-3912
(619) 441-4030

June 6, 2001

Mr. Matthew A. Peterson Esq.
Peterson & Price
Union Bank Building
530 "B" Street, Suite 1700
San Diego, CA 92101-4454

RE: P70-379W^2, Salvation Army Divisional Camp:

Dear Mr Peterson:

The Department of Planning and Land Use (DPLU) is in receipt of your letter dated May 31, 2001. The Department looks forward to receiving Salvation Army's resubmittal of the above referenced plans on or before June 22, 2001.

Upon reviewing the new plans and determining the degree to which the project has been revised from that formerly applied for, DPLU will determine whether to "rescope" the project, and will inform the applicant of any additional information which may be needed, including information necessary for CEQA processing. If DPLU determines to rescope the project because the new plans depict a substantially revised project, such rescoping will include routing the project to applicable Departments, agencies and the Ramona Community Planning Group for comments.

DPLU will also advise the applicant of the date that the Draft EIR and the Specific Plan text must be submitted. Whether or not the date of September 22, 2001 (as you propose in your letter) is a reasonable submittal date, will depend upon the extent of project revisions. If the project revisions are not substantial, there will not be sufficient justification for such a long period of time to submit those materials, and an earlier submittal date will be set.

Please contact Joe Farace, Project Manager when you a ready to resubmit the revised plans. Mr. Farace will make arrangements with the DPLU Zoning Counter to accept the plans. If you have additional questions, contact Joe Farace at (858) 694-3690 or by e-mail at jfaracpl@co.san-diego.ca.us.

Sincerely

DAVID HULSE, Chief
Current Planning

DH:JF

cc: The Salvation Army, 2320 5th Avenue, San Diego, CA 92101
Sean Cardenas, BRG Consulting, Inc., 304 Ivy Street, San Diego, CA 92101
Michael B. Matalon, Matalon Architecture & Planning, 7596 Eads Avenue #120, La Jolla, CA 92037
Kenneth Brazell, Project Manager, Department of Public Works, M.S. O336
Susan Porter, Regional Planner, Department of Planning and Land Use, M.S. O650
John Peterson, Groundwater Geologist, Department of Planning and Land Use, M.S. O650
Glenn Russell, Project Analyst, Department of Planning and Land Use, M S O650

MUSSEY GRADE ROAD ALLIANCE
P.O. B. 683
RAMONA, CALIFORNIA 92065

June 13, 2001

Dear Supervisors:

Attached please find copies of the five presentations made today by members of the Mussey Grade Road Alliance concerning the project processing of the application by the Salvation Army to expand its major use permit on historic Mussey Grade Road. Please note that the presentation by John Estes on behalf of Golden Eagle Farms, inadvertently omitted due to the limitation of five speakers at the front end of the Board meeting, is also included here. We thank you for your time this morning in listening to these presentations.

We also want to publicly thank Supervisor Dianne Jacob for her intervention on our behalf. We are pleased that she has requested a report to ensure that the process involved has been a fair one to both the immediate community as well as the applicant.

In order to assist the project report, we are attaching here, additionally, a number of important documents in chronological order that are directly material and relevant to a determination of fairness of the process. These documents are central to actions taken by DPLU within the last 6-8 weeks, crucial weeks in our minds concerning the promises made to us, as well as the promises broken. The documents are either self-explanatory or have been labelled.

We look forward to receipt of a report on the fairness of the process within a reasonable period of time, including these documents as references and appended to that report. In order to make sure all bases have been covered, this fax is being copied to the DCAO's office and the office of the DPLU Director.

Sincerely,

Diane Conklin
Spokesperson

Attachments

cc: Gary Pryor, Director, Department of Planning and Land Use
Robert Copper, Deputy County Administrative Officer

3/20

MUSSEY GRADE ROAD ALLIANCE

PRESENTATION TO THE BOARD OF SUPERVISORS
REGARDING THE PROPOSED SALVATION ARMY PROJECT
ON MUSSEY GRADE ROAD

WEDNESDAY, JUNE 13, 2001

DIANE CONKLIN, 19412 KIMBALL VALLEY ROAD, RAMONA, CALIFORNIA.

ONCE AGAIN WE OF THE MUSSEY GRADE ROAD ALLIANCE ARE HERE BEFORE YOU WITH THE LATEST INSTALMENT OF THE SALVATION ARMY SOAP OPERA. WE CALL IT "PROCESS IMPOSSIBLE".

AS YOU MAY RECALL, IN THE LAST EPISODE WE CAME HERE ON APRIL 25TH DEMANDING THE ARMY BE SENT A LETTER DPLU HAD ALREADY WRITTEN, BUT WAS HOLDING BACK. THAT LETTER TOLD THE ARMY TO WITHDRAW THEIR PROJECT OR FACE A RECOMMENDATION FOR DENIAL. REMEMBER, THIS PROJECT HAD ALREADY HAD FIVE TIME EXTENSIONS AND STILL COULD NOT PASS MUSTER.

THE LETTER WAS FINALLY SENT OUT, IN FACT THE NEXT DAY. WE WERE HAPPY.

THE FOLLOWING WEEK, WE MET WITH DPLU DIRECTOR GARY PRYOR, PER YOUR INSTRUCTIONS TO HIM.

HE TOLD US IF THE ARMY DID NOT WITHDRAW, THE DEPARTMENT WOULD INDEED TAKE THE PROJECT TO THE PLANNING COMMISSION FOR DENIAL. AGAIN, WE WERE HAPPY.

THEN, THE ARMY DID SEND A WITHDRAWAL LETTER, BUT WITH MANY CAVEATS. DPLU WAS ADVISED BY COUNTY COUNSEL TO NOT ACCEPT THE LETTER. AND SO, THE ARMY DID NOT WITHDRAW.

NOW, INSTEAD OF TAKING THE PROJECT FORWARD TO THE COMMISSION FOR DENIAL, DPLU HAS NEGOTIATED, WITH THE AID OF COUNTY COUNSEL, A SIXTH EXTENSION -- A DEFACTO EXTENSION. THE ARMY HAS UNTIL JUNE 22ND TO RESUBMIT A REVISED PLAN.

WE ASK:

WHY DID THE DIRECTOR TELL US ONE THING AND DO ANOTHER?

4/20

WILL ALL DEVELOPERS NOW USE THE ARMY'S TRIED AND TRUE METHOD OF NOT WITHDRAWING A PROJECT?

BOTTOM LINE: WHO OWNS "PROCESS IMPOSSIBLE?"

WE SAY WE DO -- THROUGH YOU.

WE ASK YOU TO INTERVENE NOW. TELL THE DPLU TO GO FORWARD TO YOUR COMMISSION FOR DENIAL.

THANK YOU.

5/20

Good Day Ladies and Gentlemen,

I am Robynne Hanus and I'm here to speak on a non-agenda item: specifically, the Salvotion Army's request for a sixth extension to their Sierra del Mar Divisional Camp and Conference Center project.

This is the public's perception of the Salvation Army's Camp:
It's simply a "Campground for Underpriviledged youth".

Nobody here today con deny the benefits that the Salvation Army camp can provide.

But, what the public doesn't see is **this – the reality** of their proposal

This Board has the distinct advantage of knowing what goes on behind the scenes to create something of **this** magnitude:
The plans, drawings and schematics
The studies and reports
The hundreds of thousands of dollars the Salvation Army has spent *just* to get to this point today -
Not to mention the hundreds, perhaps thousands, of County employee manhours **already** spent on this project

You know the **summary** of these thousands of pages of documents; among other things their proposal includes:
A conference center
A 24,000 square foot dining center
Motel style buildings
Meeting Rooms
A Theatre
A Spa
Convenience store
An RV Park with dump station
And don't forget the **Waste Water Package Treatment plant**

You ***know*** this isn't simply a camp for kids...

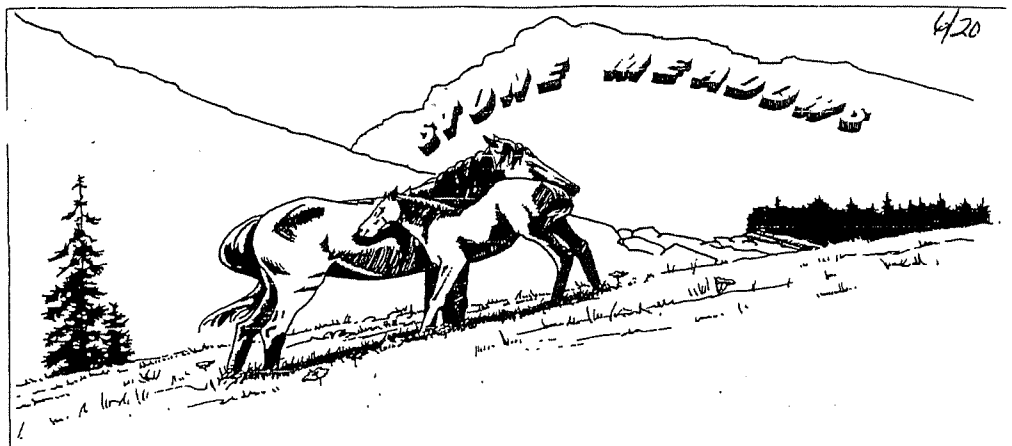
This is a full-blown development equivalent in size to that of 160 single-family homes in our community. Would any other developer be given the same latitudes and leniencies already shown the Salvation Army?

They **must** be treated as any other developer!
No favoritism
No more extensions
No more waivers
Enough excuses!

Their plan is unacceptable! Our community and our environment simply cannot support this project – no matter how many extensions are requested.

Thank you!

4/20



June 13, 81

Hello, my name is Carol Levin. I live at 12917 Mussey Grade Road, Ramona, California. I live 5 miles from HIGHWAY 67 at the very end of the 'one way out' Mussey Grade Road. I have lived on our ranch for 34 years and I have lived in San Diego County for most of my life.

I am opposed to the SALVATION Army project and very mystified and upset at the way the Department of Planning and Land Use has handled the application..

At a meeting with the DPLU I attended as a member of the Mussey Grade Road Alliance steering committee we were told that if the Salvation Army did not withdraw their application the DPLU would take it to the planning commission for denial.

Who can we trust? We are very concerned and we are fighting to preserve our rural way of life.

Carol & Joel Levin

Presentation by Toni Moore

My name is Toni Moore and I live at 15648 Mussey Grade Road.

I don't like the way this process is being handled.

I want you to intervene, and I want you to intervene now.

Thank you.

Presentation by Heidrun Meador

My name is Heidrun Meador. I live on 13364 Mussey Grade Road.

I believe we would all agree that the administration and application of government should be humane and fair.

The tradition of respecting due process is to insure this fairness, not to circumvent it.

Fairness, in this case, is not having one due process for the well positioned, and one for the less well positioned.

We are trusting you to discourage unequal treatment of applicants for special consideration.

Thank you.

9/20

My name is John Estes. I am employed by Golden Eagle Farm and represent the owners as it pertains to the Salvation Army project.

Golden Eagle Farm is located directly adjacent to the subject property, Bordering Mussey Grade road in Ramona. The farm's property is home for up to 150 thoroghbred horses depending on the time of the year.

Golden Eagle Farm **does not** support the planned expansion of the Salvation Army's Sierra Del Mar Divisional camp and conference center.

Golden Eagle Farm had applied for a modification of their major use permit which was formally withdrawn several months ago due to a number of factors, the letters addressing the withdrawl are on file.

We will assist Diane Conklin and the Mussey Grade Road Alliance in the preservation of Mussey Grade road as well as the surrounding area. Furthermore we will follow very closely the process involved with this inappropriate proposed development .

Thank You.

3/3

MUSSEY GRADE ROAD ALLIANCE
P.O. B. 683
RAMONA, CALIFORNIA 92065

June 25, 2001

Mr. Robert Copper
Deputy Administrative Officer
County of San Diego

BY FAX

Re: Report on Fairness of Process Regarding Salvation Army Project on Mussey Grade Road

Dear Mr. Copper:

I am writing to you on behalf of the membership of the Mussey Grade Road Alliance, a grassroots group organized to preserve and protect historic Mussey Grade Road. As of today, the Mussey Grade Road Alliance has not received the results of the report requested by the Board of Supervisors on June 13, 2001, regarding the fairness of the process concerning the Salvation Army proposed conference center project on Mussey Grade Road.

The report, requested by Supervisor Dianne Jacob after our second intervention before the Board, was to have investigated, with results reported back to the Board, the arrangements made by the Department of Planning and Land Use with the applicant to allow a sixth de facto extension and a re-submittal of the project by June 22nd.

However, while the report has not been issued the Salvation Army resubmitted a newly revised plan to the Department of Planning and Land Use last Friday. As we stated at the Board meeting on June 13th, our concern is that the Salvation Army is being allowed by the Department to resubmit a revised project **without properly withdrawing its present, flawed project.**

We take issue with the Department's decision and with any material review by the Department of the revised Salvation Army plan prior to the receipt by the Board, and ourselves, of the investigative report that we understand you are conducting.

In order to assist the project report, we have previously provided the Board and you a number of important documents that are directly material and relevant to a determination of fairness of the process. These documents are central to actions taken by DPLU within the last 6-8 weeks.

We again state that we look forward to receipt of a report on the fairness of the process, including the use of these documents as references and appended to that report. We further state that until and unless such a report is forthcoming, and its findings and

conclusions are made publicly available, the Department must abstain from any action to further the progress of the process now presently under investigation.

Sincerely,

Diane Conklin
Spokesperson

cc: Board of Supervisors

MUSSEY GRADE ROAD ALLIANCE
P.O. B. 683
RAMONA, CALIFORNIA 92065

(760) 787 - 0794 (760) 788 - 5479 Fax

July 2, 2001

Supervisor Dianne Jacob
Second District
San Diego County Board of Supervisors

BY FAX

Re: Salvation Army

Dear Supervisor Jacob:

We, Steering Committee members and supporters of the Mussey Grade Road Alliance, a grassroots organization of 100 families living along historic Mussey Grade Road, are deeply disturbed by the lack of action concerning the Board of Supervisor's June 13th request to the County Administrative Officer (CAO) to produce a report evaluating the fairness of the process in the handling of the application of the Salvation Army.

We believe the Army's intent to build a resort on Mussey Grade Road to accommodate more than 750 overnight guests is completely contrary to our community character and present rural residential zoning. We object to the continued, and unauthorized, processing of the newly revised application in the form of an amended Proposed Master Plan, which, by the way is not materially different from the previous plan. No action should be taken on the revised plan until and unless the report you requested be conducted and the results be made public.

We are also dismayed that this revised plan, submitted to the Department of Planning and Land Use on June 22nd, was accepted by the Department without the Department mandating that the Salvation Army withdraw the previous plan. This manoeuvre makes no rational or bureaucratic sense. Indeed, to us this action is but one example of favored treatment received by the Army at the hands of the Department.

We advise you to continue to seek the truth of the matter. We support you in the quest for a logical explanation of the chain of events. And, we insist the investigation not be dragged out while business as usual continues at the Department level.

Above all, we are concerned with the precedents being created by this project and the inevitable confusion that will result regarding the Department's project processing modus operandi. We are acutely aware that these precedents may cause the County of San Diego, and the Board, a prodigious price in the future by establishing a transparently unfair playing field for processing of development now. Therefore, we ask you to communicate to us within the next 10 days the progress of the report concerning the ongoing investigation, including the estimated completion date.

Signed: (Please see attached signature page)

NAME	ADDRESS
[illegible] Bale	14748 MUSSEY GRADE RD
Lori L. Moore	15648 Mussey Grade Rd
Michael Hanus	14776 MUSSEY GRADE RD.
Melvin G. Kettner (M.D.)	14353 Mussey Grade Road
Ann B. Varnado	19590 LAUREL LN.
Kirdon M. Meador	13364 Mussey Grade Rd
Carol J. Levin	12917 Mussey Grade Rd.
Donna J. Schneider	14062 Fernbrook
Betty D. Meador	14353 Mussey Grade Rd.
Ed Schneider	14062 Fernbrook
[illegible]	12917 Mussey Grade Rd
Bruce S. Meador	13364 Mussey Grade Rd
[illegible] Varnado	19529 Laurel Ln
[illegible]	19529 Laurel Ln
[illegible] W. Mitchell	19412 Kimball Valley Rd
Diane Conklin	19412 Kimball Valley Rd.

/5

MUSSEY GRADE ROAD ALLIANCE
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STEERING COMMITTEE: JULY 2, 2001

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CAROL LEVIN, TREASURER
BRUCE MEADOR
DONA SCHNEIDER, CHAIR, COMMUNICATIONS
ANN VARNADO

DIANE CONKLIN, SPOKESPERSON

1/22

County of San Diego

WALTER F. EKARD
CHIEF ADMINISTRATIVE OFFICER
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CHIEF ADMINISTRATIVE OFFICE
1600 PACIFIC HIGHWAY, SAN DIEGO, CALIFORNIA 92101-2472

July 26, 2001

TO: Supervisor Bill Horn, Chairman
Supervisor Ron Roberts, Vice Chairman
Supervisor Greg Cox
Supervisor Dianne Jacob
Supervisor Pam Slater

FROM: Walter F. Ekard
Chief Administrative Officer

REPORT REGARDING PROCESSING OF SALVATION ARMY DIVISIONAL CAMP AND RETREAT MAJOR USE PERMIT; MUP70-379W[2]

During the public communication portion of the April 25, 2001 Board of Supervisors' meeting, Diane Conklin, Linda Conde and Richard Zelmer addressed the Board claiming that the Salvation Army project is not being processed in accordance with established procedure and requested a meeting with the Director of Planning and Land Use (DPLU). That meeting was held on May 2, 2001.

On June 13, 2001, Diane Conklin, Robynne Hanus, Carol Levin, Theone Moore and Heidrun Meador made a request during the public communication portion of the Board of Supervisors' agenda to deny the project for various reasons, among them lack of fairness of the process. On motion of Supervisor Jacob, the Board directed the Chief Administrative Officer to provide a report on the process related to the Salvation Army project.

A review of the process related to the Salvation Army project was conducted and included a review of the following: the materials submitted by Diane Conklin via fax dated June 13, 2001 (included as an attachment to this letter), the Major Use Permit processing procedures, the events as related to the Salvation Army project as well as information from County staff and County Counsel. Findings regarding the Major Use Permit processing procedures and the processing of the permit for the Salvation Army Project are summarized below.

Major Use Permit Process
The DPLU procedure is that if an applicant appears to be making reasonable progress in processing an application, time extensions will be administratively approved. The DPLU routinely makes administrative decisions to grant applicants more time to revise plans and address identified issues that arise during the review process. It is DPLU's position that accepting plan revisions during the review process results in a better final project that addresses problem areas identified by the various internal reviews. Without this level of flexibility, numerous projects would be routinely denied due to nonconformance to applicable ordinances and policies.

Because of the time involved in processing, and public and internal review of new plans, it is not uncommon for relatively complex projects to take at least one to two years to complete the review process. Some examples of similar projects are Palomar Baptist Camp (2 years) and Rainforest Ranch Boys and Girls Club (3 years+).

When a project appears to have stalled and no progress is made in addressing critical issues identified by County staff, DPLU will take projects forward for denial for lack of progress. Keeping stalled projects "on hold" does not benefit either the applicant or the DPLU. If projects are not proceeding for a long period, new regulations can come into effect that significantly impact the design and feasibility of a project, and consume staff time in processing projects that are not consistent with County requirements. However, this is not the case with the Salvation Army Major Use Permit.

Salvation Army Process
The applicant submitted an application for a Major Use Permit on August 20, 1998. A total of five extensions have been granted for an additional 45 weeks of time beyond the standard timeline.

A request for a sixth time extension of five months was received on April 13, 2001. However, on April 26, 2001 DPLU denied this request and requested that the Salvation Army withdraw their project. On May 11, 2001 a withdrawal was received, but this was determined to be unacceptable to DPLU because of conditions that the applicant attempted to impose upon the County. When the applicant was informed that the conditional withdrawal was unacceptable, they proposed a new schedule, which would include: (1) submittal of revised project plans by June 22, 2001; and (2) submittal of a new screencheck draft EIR and Specific Plan text by September 22, 2001 (Matthew Peterson letter dated 5/31/01).

DPLU, in consultation with County Counsel, determined that it would be appropriate to allow the revised project plans to be submitted by the promised date (June 22, 2001), and then based on those revised project plans determine whether the extent of changes in the project warranted the September 22, 2001 submittal date for the EIR and Specific Plan. This determination was communicated to the applicant on June 6, 2001. The reasons for this determination included an appreciation that the June 22, 2001 submittal date would arrive before a proposed staff report recommending project

denial could even be presented to the Planning Commission for a recommendation to the Board of Supervisors, and awareness that if the project were substantially revised, the environmental review process would have to be re-commenced.

On June 22, 2001 the Salvation Army submitted revised project plans, as promised. They thus complied with first element of the DPLU determination to submit revised project plans by June 22, 2001. In reviewing the new submittal, staff found that the proposed changes to the project were relatively minor, representing an overall decrease in the project size and small shifts in building footprint locations. In general, the project appears to have decreased in size by less than 10%. Consequently, DPLU determined that it was not necessary to re-commence the environmental review process, and that the September 22, 2001 date requested by the Salvation Army for submission of the Second Screencheck Draft EIR and Specific Plan Text was unreasonable. On July 5, 2001, the Department instead informed the Salvation Army that these items must be submitted by August 20, 2001. This period, between submittal of the revised plan (June 22, 2001) and the August 20, 2001 deadline, is consistent with County CEQA EIR processing timelines, which allow at least 45 days for the applicant to make revisions to project plans, and submit a second screencheck draft EIR. An extension of this deadline past August 20, 2001 will not be granted by DPLU. The failure to provide required updated EIR and specific plan by this deadline will result in going forward with a denial.

Conclusion
Given the typical length of time required to process similar projects, the time given to the Salvation Army to provide revisions is not unreasonable or unusual. Therefore, the processing will continue for the Salvation Army Major Use Permit MUP70-379W[2] in accordance with the above timelines established by the DPLU.

If we can be of any further assistance please call Cathy Martinez with the Land Use and Environment Group at (619) 531-5186 or me.

Respectfully,

Robert R. Copper
Deputy Chief
Administrative Officer

WALTER F. EKARD
Chief Administrative Officer

Attachment

cc: Diane Conklin
Robynne Hanus
Carol Levin
Theone Moore
Heidrun Meador

GARY L. PRYOR
DIRECTOR
(858) 694-2962

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October 8, 2001

3x1 wetlands
buffers
50' oak drip line

The Salvation Army
Major David Hudson
825 Seventh Avenue
San Diego, CA 92101

RE: SALVATION ARMY DIVISIONAL CAMP AND RETREAT EIR; MUP 70-379W2; ER 98-14-023; SCH 2000031058; SECOND ITERATION REVIEW OF THE SCREENCHECK DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), SPECIFIC PLAN TEXT, AND LANDSCAPE PLANS

Dear Sir:

The Department of Planning and Land Use (DPLU) has completed the review of your screencheck draft EIR and determined it not to be adequate pursuant to the California Environmental Quality Act (CEQA) and the County's "Environmental Impact Report Format and General Content Requirements". At this time, additional information or revisions are required to make the document adequate and ready for either public review or review pursuant to Board of Supervisors' Policy I-119. The reasons for this determination and the revisions/information required are as follows:

NOTE: The next submittal of the screencheck draft EIR will represent the third submittal iteration for your project. If the next iteration of screencheck draft EIR is determined to remain substantially inadequate after staff review, the Department may make a recommendation for denial of your project to the appropriate decision-making authority based upon inadequate progress pursuant to CEQA Guidelines Section 15109.

REVISIONS AND ADDITIONAL INFORMATION: The following comments are organized according to the staff members who reviewed the documents.

II. THE FOLLOWING COMMENTS WERE MADE BY PROJECT MANAGER JOSEPH FARACE:

1.0 Project Description and Environmental Setting

1) Page 1-1, last line of second paragraph: The specific plan does not implement improvements, it organizes a comprehensive plan to assure that future implementing permits are carried out in the proper manner. The major use permit implements improvements described in the specific plan.

2) Page 1-1, The heading for Section 1.1.1 should be "Project Description" not "Specific Plan Description." The "project" is the specific plan and use permit modification. The information contained within this section is adequate in that it describes the project however the project needs to be viewed as the project as a whole and not just focus on the specific plan since this is not specifically what the EIR is analyzing.

3) Page 1-1, second last line of page: Typo, "periment" should be "permanent".

4) Somewhere within the Project Description (1.1) section of the EIR, operational characteristics of the proposed project should be discussed. Section 1.4.3 discusses Existing Operational Characteristics and Section 2.13.1, (A) discusses Operational Characteristics at build-out. The operational characteristic should. also contain information on who will be using the facilities. This information needs to contained within the Project Description.

5) At the end of Section 1.1.1, Page 1-6, it would be a good idea to provide the reader with a summery of the proposed project in terms of total existing square footage, total proposed square footage, total existing disturbed area (due to grading and existing improvements) versus total proposed disturbed area. Again, reiterate the total number of users, employees and available parking. This will provide a concise vision of the scope of the entire project.

6) What types of activities will occur within the multi-purpose building? The applicable section on Page 1-3 can be revised to reflect this information.

7) Remove referenced to "Conceptual" Phasing Plan and "Conceptual" Site Plan through-out the document. The project site plan will be approved as part of the of proposed use permit modification. What is approved on the site plan is expected to be constructed and should not be analyzed in the EIR in concept. Deviations from the approve site plan may be (depending on scope) implemented through a minor deviation to the approved site plan or a modification to the use permit. Significant changes to land uses or

distribution/location of those land uses may result in an amendment to the specific plan.

8) Page 1-7: top of page, a camp chapel is mentioned however in the Project Description section no mention of a camp chapel is made. The project description states that the existing retreat facility would be converted to staff housing. Please clarify.

9) Page 1-7: second last line of first paragraph under 1.1.3 Conceptual Site Plan, change "Special" to "Major" Use Permit.

10) Page 1-12: bottom of page, "Two staff housing buildings" is listed twice.

11) Figures 1-9 through 1-14 are listed as "Landscape Concept Plans" at the bottom of each plan. This implies that we are looking at a concept landscape plan when the intent of the plans are to show details of the Planning Areas. Please revise each plan to indicate Plan Area 1 through 6.

2.8 Visual Quality

12) Page 2.8-1: the last paragraph indicates twelve KOPs were chosen. Thirteen KOPs are shown on pages 2.8-2 and 2.8-3.

13) Page 2.8-7 the bottom paragraph discusses potential significant effects under Section 2.8.3 as a result of visual impacts from the Multi-Use Building, Indoor Mini-Theater and Central Dining Facility. Previous discussed as well as review of the plot plan indicate that the central dining facility was a key component in this cluster of building's and should be analyzed to determine a significant visual impact. However the central dining facility is not discussed within the KOP discussion nor is a picture if the central dining area shown in the photo simulations. The aforementioned paragraph states that the two photo simulations were created for these project components to show the scale and bulk of the proposed buildings. Yet, the dining facility is not shown on the photo simulations. It appears that the photo simulations should be revised to include the central dining facility.

14) Include architectural building elevations within the Visual Analysis for at least the buildings discussed in the section, Retreat Center, Multi-Use Building, Indoor Mini-Theater, Central Dining Facility and Maintenance facility. This will provide the EIR reader with an understanding of the project compliance with Design Review Guidelines and visual mitigation relating to building design.

II. THE FOLLOWING COMMENTS WERE MADE BY LEAD ANALYST GLENN RUSSELL:

General Comments

1. Have all proposed uses been adequately identified in the EIR? For example, are there any uses, such as school events, other community events, concerts, gatherings, or any other uses that will be allowed to take place on the property tat are not discussed in the EIR and Specific Plan? If not, please identify these uses, discuss any potential impacts that they may have, and identify if there is adequate parking for such uses. For example, on page 27 of the Traffic Study, there is a discussion of Special Events that indicates that the client has estimated that a maximum of 700 people could use the site at once for special events, requiring about 299 parking spaces. Are these people in addition to the stated 778 users identified in the project description? The project description identifies 188 parking spaces. This would appear to be insufficient for the needs of the Special Events patrons. This issue needs to be more adequately addressed in the EIR and associated technical studies.

2. The document discusses 1) components, 2) phases, and 3) planning areas. This leads to a significant amount of redundancy in the text of the EIR. This needs to be simplified. I suggest possibly integrating the discussion of planning areas into the discussion of components. Or, there is nearly a one to one correlation of planning areas and phases. Perhaps these could be integrated. Perhaps planning areas, phases, and components could be integrated into a single discussion. I am open to other suggestions, but these discussions need to be simplified and made less redundant.

3. Check the text throughout the document against the references Section 7.0 to be sure that all citations are in the references sections and that all listed references have actually been cited. For example, there are references in Section 3.3.5 to Dickman 2000 and SANDAG 1998 that are not in the references section.

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4. Supervisor Dianne Jacob's name is spelled incorrectly. Check this throughout the document.

Section S.0, Summary

5. The expanded and relocated retreat component is referred to both as a retreat and a conference center in various project documents and maps. These are somewhat distinct uses and consistent and appropriate terminology should be

used to identify this project component throughout project documents and maps. Given the description provided, this component should probably be identified as a conference center.

6. Page S-1: Should the bath house be identified in the list of project components?

7. Page S-3: The text refers to the "congested Mussey Grade Road." Is Mussey Grade Road congested?

8. Page S-3: The third paragraph of the Areas of Controversy needs to be revised to make it clear that the Policy I-78 (not I-70) and the 8" water main are no longer areas of controversy because they are no longer project components. In fact, these issues should probably be deleted and the discussion should only identify current project areas of controversy that are relevant to the analysis and conclusions presented in the EIR.

9. Page S-3: The last paragraph on the page should be deleted. It has nothing to do with areas of controversy that the EIR addresses. If the applicant wishes to discuss project history, this should be done in a section of the project description.

10. Page S-3: Considering the letter in the Appendices from Mr. Bittner, the pair of golden eagles must be added to the discussion of areas of controversy.

11. Page S-3: Add a discussion of fire safety to the areas of controversy. There is at least one newspaper article that identifies this as a significant issue and raises it to the level of a controversial issue.

12. Page S-4: Section S.5 needs to be expanded to provide detail on the issues of mitigation and alternatives, as discussed in the direction provided in the EIR Format and Content Guidelines.

13. Table S-1: Impact 2.6a should identify what the storage tanks are for.

14. Table S-1: Impact 2.6b includes reference to two things that "are discussed above." These should be revised to identify where those discussions are located.

Section 1.0, Project Description and Environmental Setting

15. Section 1.1.1 begins with a sentence that crosses the line into project advocacy. An EIR should be a neutral description and analysis of the project. Revise this sentence or delete it.

16. The proposed RV facility does not appear to comply with Title 25 California Mobile Home Park Act. Please revise, as necessary, the description of this proposed facility and analyze any associated impacts.

17. Page 1-4, paragraph 2:The reference should probably be to "dedicated" not "designated" open space.

18. Page 1-4, paragraph 3 does not begin with a proper sentence.

19. Page 1-4, paragraph 3: In this discussion, and perhaps elsewhere in the EIR, it would be useful to identify the DEH process regarding storage and handling of hazardous substances. This process includes an initial application and eventual "business plan," if needed.

20. Page 1-4, paragraph 4: The discussion of road widening needs to be revised to make it clear that the project does not intend to widen Mussey Grade Road.

21. Page 1-4, next to last paragraph: It would be more appropriate to say that the Specific Plan is consistent with the community identity of Ramona. ?

22. Section 1.1.3 Conceptual Site Plan: The discussion of planning boundaries is confusing. It is not clear to me what, if anything, these boundaries have to do with substantial conformance or conditioning of the project. It is probably not useful to refer to substantial conformance at all. This discussion should be replaced with a discussion that describes the Minor Deviation and Major Use Permit Modification procedures (not Special Use Permit) that are relevant to making changes from what is approved. We will be considering for approval uses, not planning boundaries. In addition, if subsequent permits, such as grading permits, are required, these will be evaluated in the 15162 CEQA findings process, not substantial conformance.

23. Page 1-9, Planning Area Six: Include the pool and spa in the list of component characteristics.

24. Section 1.2 Project Objectives: Delete the first paragraph.

25. Page 1-10, second paragraph: delete the final sentence of the paragraph. A plea for approval does not belong in an EIR.

26. Page 1-10, Paragraph 3:This paragraph does not belong here. Move it to the project description section. Also, the uses are vaguely described. What uses are they? Are these in addition to the Salvation Army camping uses? Who are the "other users"? Is there sufficient parking for all of these other users, in addition to

the regular camp users? Could these other users increase the camp population beyond the stated maximum at any point?

27. Page 1-10, Project Objectives: All project objectives should be listed here. If there are any in sections 1.1 and 1.2 not listed here, they should be.

28. Page 1-11: Again, it would be better to say "be consistent with" rather than "reinforce" the community identity with Ramona. !

29. Page 1-11: The last two project objectives are essentially redundant with previously stated objectives. Unless they can be written in such a manner that they are clearly different objectives than those previously listed, they should be deleted.

30. Page 1-11, section 1.3, Intended Uses of the EIR: The discussion fails to identify the type of EIR and why it was chosen. Also see CEQA sections 15124(d) and 15160-15170 for additional direction on the content of this section.

31. Page 1-11, Section 1.3.1: There is nothing after the colon at the end of the paragraph. It appears that the matrix of project approvals is missing.

32. Page 1-11, Section 1.4 Environmental Setting: Although there is a heading, this section is missing from the EIR.

33. Sections 1.4.2 Existing Topography and Land Uses, 1.4.3 Existing Operational Characteristics, and 1.4.3 (again) Existing Surrounding Land Uses: Most of this discussion does not belong in this section, which is supposed to be about the environmental setting. It is project description information. Except for actual description of the environmental setting, it should all be deleted. If there is important information here that is not repeated elsewhere, the project description could be revised to address existing and proposed uses.

34. Table 1-1: The Table should indicate if LAFCO action will or will not be required, not that it might be required. If it is required, the issue must be addressed in the EIR.

Section 2.0, Significant Environmental Effects

35. General: Please review all Thresholds of Significance. Although this is not always easy, thresholds should be identified and defined as precisely as possible, using quantitative thresholds where possible, and well defined qualitative thresholds where necessary. The source of all referenced thresholds should be provided as well as a rationale for their use as thresholds. Simply

identifying that an impact is significant if it is "substantial" (e.g. water resources section) does not provide enough information to be able to be used as a valid threshold.

36. Page 2.1-1, First Paragraph: Analysis of cumulative impacts "is"

Section 2.1 Land Use and Planning

37. Page 2.1.1.1: The Existing Conditions, Project Area section includes redundant information with section 1.4. Such duplication needs to be avoided.

38. Page 2.1.1.2: The last half of the paragraph is largely redundant with information provided in the previous chapter.

39. Page 2.1-2, 2.1.1.3 Applicable Land Use Policies and Plans: These descriptions could be shortened significantly. For example, do we really need a listing of all the elements of the General Plan? What is most important is that the analysis identify where inconsistencies with the plans exist and how to mitigate them.

40. Page 2.1-4, Noise: The last sentence of the first paragraph seems to imply that exceeding of the County's Noise Ordinance is acceptable if there is no one living nearby, even though there might be someday. The statement is unclear and not correct. Revise or delete this statement and review the noise analysis in order to determine if this incorrect assumption underlies any of the analysis or conclusions reached in the noise analysis.

41. Page 2.1-5 Landscape Issues: The discussion refers to a Landscape Concept Plan. If this is important for the reader to understand the discussion, the plan, or at least examples from it, should be used as figures in the EIR.

42. Page 2.1-5 Landscape Issues: The last paragraph on the page indicates that there are no significant impacts based on the Specific Plan, but mitigation measures are listed on the next page. This is apparently inconsistent.

43. Page 2.1-6, Section 2.1.3.1: The Use Permit number is incorrect.

44. Page 2.1-6, Section 2.1.3.1: The thirds paragraph of this discussion should indicate that the project is consistent with the plans once mitigation has been incorporated.

45. Page 2.1-7, Section 2.1.3.1: The conclusions refer to erosion, fire problems, and urban levels of service. It does not appear that these issues are discussed in the

analysis section of this sub-chapter or identified by reference in other areas of the EIR.

46. Page 2.3-1, Section 2.3 Water Resources: This section discusses issues related to flooding and water quality. The discussions and sub-headings should accurately identify and differentiate these two different issues.

47. Page 2.3-2, Section 2.3.3- The reference to the NPDES general permit should more specifically identify which permit is being referred to.

48. Page 2.3-3: Are the design measures referred to in the second paragraph listed at the end of the document in the appropriate section?

49. Mitigation Measure 2.3.b: It is not clear to the reader how the amount of water going through the septic tank is regulated. Also, if the leach field is flushed to prevent high concentrations of nitrates and phosphates, where does the effluent go? I have the same question regarding flushing of the lines to prevent buildup of organic material.

50. Section 2.6.4, MM 2.6a: The mitigation measures should probably reference the Department of Environmental Health procedures for permitting the use of hazardous substances through preparation and approval of a "business plan."

51. Section 2.6.4, MM 2.6b: The mitigation measure identifies a water system to be designed later. In order to determine if the mitigation proposed is appropriate, more detail is needed on the nature of this system, even though final design may not yet be available.

52. Section 2.6.4, MM 2.6b: The mitigation also proposes minimum 24 feet paved surfaces for all fire access roadways, except where not in conflict with biologically sensitive areas. This implies that the fire department would approve less than 24 feet wide roads in order to avoid impacting biological resources. Is that true? If so, where would these roads be less than 24 feet wide and would that be a fire hazard, especially considering that the main access road passes through a biologically sensitive riparian forest for several hundred feet beginning at the project entrance.

Section 2.7 Noise

53. Section 2.7.1.1: Correct typo in last sentence of first paragraph.

54. Impact 2.7.e, page 2.7-7: The last line on the page identifies three protocol surveys for gnatcatchers. I believe that there was actually only one.

Section 2.8 Visual Quality

55. Section 2.8.2 Thresholds: Where are these thresholds from?

Section 2.9 Cultural Resources

56. Section 2.9.1.3, Mussey Grade Road: Please provide the current status of this "possible" nomination.

57. Section 2.9.1.4: Please provide a confidential technical appendix that includes record search information, site forms, updated site forms, etc. for the project and submit a single copy as a separately bound document. Some of this confidential information is currently part of appendix E3 and should be removed.

58. Section 2.9: If the sites on the property have been assigned permanent site numbers, these numbers should be used throughout the discussion instead of the temporary site numbers, such as "SDM-2."

59. Page 2.9.9: The last full sentence on the page indicates that no alterations to Mussey Grade Road are "anticipated." If there will be any impacts to this road, they should be discussed.

Section 3.0, Cumulative Impacts

60. Section 3.1: There is insufficient discussion of why the cumulative area was chosen and how it was defined.

61. Impact 3.2: Does the phrase "circulatory road" mean "circulation element road?"

62. MM 3.2a: More discussion is needed regarding how the Salvation Army shall establish a signal contribution program. How will this happen? Does the County DPW actually do this? The timing of this program and the construction of the signal needs to be discussed in order that it is clear that the impact will be mitigated in a timely fashion and the impact avoided.

63. Section 3.3.2: The discussion should be clarified to indicate that grading less than 3,000 cubic meters is also subject to the grading ordinance. In addition, some brief summary details of project grading should be included in this discussion.

64. Section 3.3.4: The discussion that identifies more ADT in the Off Season than the On Season seems counter intuitive. Is this correct? If so, a brief explanation of this seeming inconsistence is in order.

65. Section 3.3.5: Although MSCP is an important part of the discussion of cumulative impacts, the discussion of why there are no cumulative impacts needs to be strengthened beyond simply saying that MSCP compliance prevents cumulative impacts. Why?

Section 4.0 Project Alternatives

66. Section 4.1: The section does not provide a reasonable range of alternatives. The required No Project Alternative and one Reduced Project Alternative is not enough. One or two more alternatives, at least, are necessary. If, as the discussion in the chapter indicates, moving additional project components around will not reduce impacts, additional reduced scale alternatives are required. Providing alternatives that delete and/or downsizes project components is necessary. Given the project goals, consider deleting and/or downsizing the conference center, the RV parking area, and possibly other components.

67. Section 4.1: Please review CEQA Section 15126.6 to be sure that this section complies with the requirements. For example, the discussion does not identify the environmentally superior alternative and section CEQA Section 15126.6 (e)(2) also requires that an additional alternative be identified as environmentally superior if the No Project Alternative is the environmentally superior alternative.

68. Section 4.1: The paragraph discussing the five occasions when the project has been redesigned and the associated Historical Matrix Table 4.1 should be deleted from this section, or possibly, moved to the Project Description section of the document.

69. Section 4.1: The statement that the No Development Alternative does not meet any of the project objectives is incorrect. Review and revise accordingly.

70. Section 4.1: The discussion of the rejection of the Offsite Alternative is inadequate. The discussion should identify if the Salvation Army owns any land in San Diego County that would be appropriate for the project. Also, more concrete data are needed to justify that no appropriate locations are available for purchase by the Salvation Army. Alternative locations may or may not be available, and some effort needs to be made to identify the availability of such locations and presented in this discussion. Also, simply stating that impacts would *likely* result from relocation of existing buildings is not good enough. As it

currently exists, the discussion does not sufficiently demonstrate the infeasibility of the Offsite Alternative.

71. Section 4.1, last paragraph: The discussion identifies four potentially significant archaeological sites. I believe that of the four, only one is significant. If there is any question as to the significance of the sites and this is being used as part of the basis for rejecting an alternative, the sites may need to be tested.

Section 5.0, Long-Term Environmental Effects

72. Section 5.1 Growth Inducing Impacts: Although not growth inducing, have al impacts associated with the new eight inch water line been identified? (No longer part of project See p. 5 Item 8

Section 6.0, Environmental Effects Found Not To Be Significant

73. Section 6.1.3.3: The discussion indicates that the project site has 12 of the 24 acres of leach fields needed. Where will the other 12 acres come from? Also, correct typo ("seage") in fourth line of paragraph. For the conclusion to be supported, discussion of DEH approval of the proposed septic system is necessary.

III. THE FOLLOWING COMMENTS WERE MADE BY DPLU STAFF GROUNDWATER GEOLOGIST LAURA BLOOM:

I have reviewed the geology/soils and water resources portions Second DEIR for the Salvation Army Divisional Camp and Retreat. As noted within the first review, there are no comments or suggested changes for either section. No additional review will be required for these sections. In addition, the recent changes made to the project description were taken into account with this assessment.

IV. THE FOLLOWING COMMENTS WERE MADE BY DPLU AIR QUALITY SPECIALIST JOE DESTEFANO:

DPLU air quality specialist, Mr. Joe DeStefano, has reviewed the sections of the DEIR relating to the potential air quality impacts of the proposed project. In general, the document was well written. However, the document does require revisions prior to staff approving the sections relating to air resources. The following are Mr. DeStefano's comments regarding the DEIR:

1. Staff has noted that no County-certified air quality specialist has been identified in the document as preparing the air quality analyses, as required by the County's

CEQA Guidelines. Please identify the staff, or subconsultant, responsible for the preparation of the analysis.

2. Section 2.4.1.2 provides a good discussion of the state and federal ambient air quality standards (AAQS). However, there is no clear statement within the section regarding the actual status of the air basin for the various AAQS, except for carbon monoxide and ozone. Please include a simple statement regarding the basin status for each pollutant.

3. The third paragraph on Page 2.4-1 states, "During the planning process and smog formation modeling, it was discovered that the SDAB could meet the federal ozone standard by the year 1999 without the creation of any new control programs not already in progress." Although this was believed to be true at the time of the preparation of the RAQS and SIP, it has not come to pass, and is not relevant to the discussion in the document. Please strike this text from the document.

4. Section 2.4.1.3 makes a simple statement regarding on-site odor sources. However, this statement should be expanded to discuss potential local sources of odor from off-site sources as well. If there are none, this should be stated.

5. Appendix G of the State CEQA Guidelines presents five (5) specific criteria for the determining whether a projects impacts to air quality would be significant. The DEIR only directly discusses four (4) of them. Please include the discussion regarding whether the project would "result in a cumulative considerable net increase of particulate matter less than or equal to 10 microns, carbon monoxide, or exceed quantitative thresholds for ozone precursors."

6. Section 2.4.2 presents the thresholds of significance broken down by micro and regional impacts. This is unnecessary. Please consolidate the discussions. Further, the RAQS does not consider any pollutants other than ozone, and the ozone precursors (oxides of nitrogen and volatile organic compounds). As such, simply being consistent with the RAQS does not answer the question as to whether or not a project would violate any air quality standard of contribute substantially to an existing violation.

7. To demonstrate that the project does not result in such emissions, Staff recommends the use of the San Diego County Air Pollution Control District's (APCD's) Air Quality Impact Analysis thresholds found in the APCD's new source rules (Rule 20) as a "screening" threshold for each major criteria pollutant. Since, the APCD's thresholds do not include a threshold for volatile organic compounds (or reactive organic compounds), the use of the South Coast Air Quality Management District's (SCAQMD's) threshold for ROC is recommended. If the project's air quality emissions (including fugitives) are below these thresholds which are intended

for permittable sources, it can be assumed that impacts from the project would be less than significant, and the project would not result in an exceedence of the AAQS. If however, emissions from the project were to exceed these screening thresholds, the state AAQS would be the next appropriate threshold of significance.

8. For potential toxic emissions, thresholds from APCD Rule 1200 should be used as a threshold of significance.

9. The analyses contained in Section 2.4.3 does not address the second threshold of significance at all. Further, the analyses in 2.4.3.1 does not contain any substantial data to support the claim that the project will not violate any air quality standards. Although staff agrees that, given the projects size, it is unlikely that a significant impact would occur, no documentation is provided to substantiate the claim. Such support could be provided by way of an emission inventory (using an industry standard model such as EMFAC7G), and comparing the project emissions to the numeric standards discussed above. What about traffic emissions?

10. Further, emissions from the proposed project consist of operational and construction activities. Diesel-fired construction equipment emits several pollutants of concern besides PM_{10}. Emissions from construction activities, besides diesel exhaust as a toxic, should be addressed in the document. This could be accomplished using construction methodology from the SCAQMD's Air Quality CEQA Guidelines. Further, staff recommends the use of the quarterly thresholds for construction emissions from the SCAQMD document to determine the significance of construction activities.

11. The first paragraph on page 2.4-6 makes the statement that the project will not result in substantial pollutant concentrations which would significantly impact sensitive receptors. Further, the discussion of the temporary impacts of odor from the excavation of the landfill on-site is stated as being less than significant. However, no data is provided to support either claim. Please provide the appropriate data to support all statements regarding the potential impacts from the proposed project.

12. As discussed above, the RAQS only addresses ozone. As such, conformance with the RAQS demonstrates that a project will not have a cumulatively considerable impact to air quality for ozone and ozone precursors. However, the discussion of cumulative impacts to air quality in Section 3.3.4 fails to adequately address any of the other pollutants of concern. Please revise the section to address PM_{10} and CO.

V. THE FOLLOWING COMMENTS WERE MADE BY DPLU BIOLOGIST DAWN DICKMAN:

Staff has reviewed the 2nd Screen Check Draft Environmental Impact Report and the Technical Appendices to this document. Several issues continue to be of concern to staff regarding the project and the proposed impacts to biological resources. Some of these concerns may be alleviated through additional information (requested below) while others may require revisions to the project design. Additionally, staff has not been able to verify the accuracy of the technical information provided (through a site visit) due to the information still needed. A site visit will likely be conducted following the next submittal. Please modify the project as necessary and revise the environmental documents to reflect the following:

1. There have been four changes in policy since the last iteration review of these documents. Typically, except in cases of ordinance compliance or other similar circumstances, projects do not need to make revisions to conform to new policies once one or more iterations of documents have been reviewed. However, given that the last review was completed over one year ago (far longer than most projects) and policies regarding biological resources must be kept current with scientific information and industry standards to satisfy CEQA requirements, management has decided that this project will be subject to all policies and standards current as of today. The following three policies will now apply:

   a. Grading, clearing or other development within 50 feet of individual oak trees and oak woodlands is considered an impact to that resource. Previously, the policy was 25 feet, which is reflected in the EIR and biological report. Please revise the impact analysis to consider impacts within 50 feet and to provide a 50-foot buffer when proposing preservation.
   b. The ratios for wetland mitigation do not follow the Biological Mitigation Ordinance (BMO). It has always been the case that RPO took precedence over MSCP and the BMO, as MSCP was not designed to adequately protect wetlands. Based on cases in the last year, it is now the department's policy is to require 3:1 mitigation pursuant to CEQA and industry standards. Just as in the past, this mitigation must involve the creation and/or restoration of wetlands (with at least enough creation to meet the no-net-loss standard).
   c. With use permits, it is no longer necessary to place all land not proposed for development within dedicated open space. Instead, it will only be required that the habitat specifically required to meet mitigation requirements be placed within an easement dedicated to the County of San Diego. All other land not proposed for development shall be labeled "Designated Open Space" on the plot plan and, while not an easement, shall carry the same restrictions as dedicated open space. Just as with any change in proposed uses as shown on the approved plot plan, any change in the use of the Designated Open Space shall require a major use permit modification. Any land on a site that is not within a dedicated open space easement or is not

   "designated open space" on the plot plan is considered impacted for purposes of reviewing a use permit. Please revise the plot plans accordingly (all versions of the plot plans, not just the biological resources map). As for the request that any excess open space dedicated now be available to use later as mitigation, this is too difficult to track and would cause confusion and possible errors in the future. Therefore, excess dedicated now may not be used later. However, you may at any time dedicate open space for the purposes of mitigation related to other projects over "designated open space" without requiring a major use permit modification since the uses proposed will not have been changed.
   d. Fire clearing easements are generally no longer necessary with use permits as the location of buildings is restricted by the use permit plot plan. The exception to this rule would be those cases where it is feasible that some sort of structure not regulated by the use permit may be added adjacent to a dedicated open space easement, thereby causing fire clearing within the preserved areas. It is not likely that would occur in this particular case. Thus, the plot plan does not need to include actual fire clearing easements. Instead, the amount and location of all fire clearing should be taken into account when designing the plot plan (including the location open space easements) and included in the impact analysis. Please revise the text in the middle paragraph on page 4 of the biological report.

2. No map has yet been submitted that clearly shows the areas proposed for impact as a result of the proposed project. While the plot plan is shown on the biological resources maps, it does not indicate all components to the project or the extent to which each will impact the resources. As requested previously, please submit a biological resources map that indicates the footprint of development impacts. This may be accomplished through a cross-hatching symbol similar to that currently used to indicate the proposed open space. The development footprint must include all of the following: existing and proposed structures, required fire clearing, roads, heavily used trails (used several times a week), parking lots, staging areas during construction, septic fields, meeting or gathering areas, recreational facilities, areas within native habitat that will host educational activities and a buffer along all areas in which some encroachment is expected from camp visitors. In addition, the footprint must include all areas between these impacted areas since, given the nature of the project, it is expected that the children and adults will travel throughout the site without necessarily following roads. From a review of the plot plans, it appears there will be 2-3 large footprint bubbles. Also on this map, please ensure the numbering of the various facilities matches that included in the DEIR as currently not all of the numbers on the biological resources report correspond to the legend in the DEIR plot plans. Finally, this map should outline in bold the boundary of County defined wetlands. It may be helpful for your consultants to meet with County

staff to discuss the map prior to the next submittal (to avoid additional delays if revisions are necessary).

3. Neither the DEIR nor biological report fully discusses the road located within the riparian forest in the northern portion of the site. While this road may exist, the necessary improvements, fire clearing and increase in traffic are considered an impact. In addition, any nighttime driving on this road will greatly impact wildlife movement through the area. It is highly probable that the road would prevent the project from conforming to the MSCP. You may wish to review Attachment H of the BMO for the findings that must be made regarding linkages and corridors, some of which are impossible to make with the current road alignment. As such, the project plot plan must be revised to relocate this road out from under the riparian forest canopy. Creating a new road slightly to the south of the existing road (within the southern mixed chaparral) would be a far superior alternative.

4. As discussed previously, staff has concerns about the overnight camping facility and the use of the trail leading up to it. This is not a low-impact usage and would likely have significant and unmitigable impacts. The impact is much greater than the documents describe as it will introduce direct and indirect impacts to an otherwise undisturbed area. First, the movement of wildlife, as well as foraging and possible breeding behaviors, will certainly be modified by the additional human presence, particularly from the added noise, lighting and smells (from cooking). The nearby riparian areas have already been identified as being a local wildlife corridor, thereby, directing wildlife along a path not far from the camping site. While not creating a solid barrier, the camping facility will cause some interruption to movement through the area, ranging from minor to drastic depending on the species. Further impacts would be caused by the use of the trail leading up to the site, which is located directly within a County defined wetland. Secondly, the facility will require improvements as referenced in various locations in the document, including 100 feet of fire clearing and the construction of a 50-gallon concrete-lined water basin. These improvements will not only cause an initial impact, but indirect affects in the future for upkeep and maintenance. Third, no restroom facilities are proposed. Staff assumes alternate plans have been identified, but these were not yet discussed in the report nor considered in the impact analysis. Fourth, it is not yet clear that no indirect impacts will occur to the golden eagles as a result of using the camping site, particularly given the conclusions presented in the golden eagle report prepared for Dave Bittner and the Wildlife Research Institute. Use and maintenance of the camping facility and the trail leading to the camping site will certainly encourage activity in the area beyond even that anticipated for the overnight camping facility, thereby, increasing the chance that the nesting eagles will be disturbed. Furthermore, the current plot plan indicates open space over the area containing the proposed overnight camping facility. The initial construction and long-term

use of this facility is not acceptable as a use within dedicated open space. Based on all of these considerations, staff has decided that the plot plan must be revised to either remove the overnight camping facility entirely or relocate it to a less sensitive area. If relocated, all impacts must be fully analyzed and appropriate mitigation applied.

5. With regard to wetlands:
   a. Both the draft EIR and the biological report essentially ignore County define wetlands. No reference is made to County requirements for wetlands on page 2.5-2 of the DEIR under "Wetland Delineation". Additionally, under the discussion of the Resource Protection Ordinance on pages 2.5-4 – 2.5-5, no mention is made of the strict wetland avoidance criteria or the requirements for wetland buffers. Rather the Sensitive Habitat Lands section is referenced, which has very little regulatory influence over this project given the stricter requirements for upland habitats set by MSCP and the BMO. Please revise the documents to address the RPO requirements in addition to state and federal wetland regulations.
   b. When delineating wetlands, all riparian vegetation types are considered hydrophytic for purposes of defining County wetlands. If the species composition and structure are such that the vegetation constitutes a riparian habitat type as described by Holland or other acceptable sources, then the habitat is considered to be a County defined wetland. For instance, if the understory of an oak habitat indicates southern coast live oak riparian forest (SCLORF) rather than oak woodland, particularly if associated with a drainage or stream, the outer canopy line of the SLORF delineates the boundary of the County defined wetland. Please utilize this rule when delineating County wetlands on the biological resource map. Any impacts to this habitat is considered a wetland impact.
   c. As mentioned in a comment above, all impacts to wetlands require 3:1 mitigation in the form of creation and/or restoration of wetlands. A full revegetation plan will be required prior to issuance of any grading permits or the use and reliance on the use permit. While the full plan is not yet necessary, the DEIR and biological report must discuss the revegetation plans, including the probable location. Staff must have this conceptual information now in order to evaluate the feasibility of the proposal. In addition, any impacts that may be caused by the revegetation (i.e. loss of native habitat) must be included in the current impact analysis.
   d. The Resource Protection Ordinance requires that no impacts occur to County defined wetlands. There is no variance from this requirement based on the quality or type of wetland present. However, the RPO does state "that where the extent of the environmentally sensitive lands on a particular legal lot is such that no reasonable economic use of such lot would be permitted by these regulations, then an encroachment into such environmentally sensitive

land to the minimum extent necessary to provide for such reasonable use may be allowed". Based on this provision, the department does allow in very limited cases, minor impacts if the bulk of a project is dependent on the impact occurring and the resulting impacts will not degrade the value of an important local or regional water resource. To operate a campground facility on this property, staff understands it would be difficult to avoid all of the many creeks and drainages found on the site. Only the smallest and absolutely essential impacts will be allowed to the more significant creeks/drainages in the center of the site, the forked wetlands in the north and the many smaller tributaries throughout the western half of the site – particularly since these are the wetlands that provide the most value to wildlife in the area. The least valuable of the wetland resources appears to be the drainage feature located near the existing campground facility (marked by DP1/PP1, DP2/PP2 & DP3/PP3). This is the least valuable due to the already somewhat degraded nature of the drainage as caused by the existing uses of the site and the general lack of a well-established riparian vegetation. This drainage also happens to be the most likely to be impacted if the site is to be utilized for a campground. Given the provision in the RPO to allow minimal impacts and that the site would be difficult to develop at all without impacting some wetlands, staff can agree that impacts to this particularly drainage feature would still conform to the RPO. The DEIR and biological report should make all of this very clear. In addition, documents must consider the entire length of this drainage as impacted if the current plot plan is proposed. This is due to the multiple uses proposed on either side of the creek/drainage and the likelihood that people will simply cross through and within the drainage to access various facilities on the site. This drainage feature must be shown within the development footprint on the biological resources map. There is less development proposed along and close to the central and northern forked creeks and staff will not require the entire lengths of these features to be considered impacted. However, the development footprint must be designed to provide adequate distance for buffers and access points to minimize the potential for encroachment into these wetland areas.

e. The statement on page 2.5-10 of the DEIR is not correct. Staff does not consider only direct and quantifiable losses when evaluating impacts on wetlands. Poor preserve design, adjacent land uses and proximity to existing and proposed development (buffer widths) are all considered when evaluating the extent to which indirect impacts might degrade the value of the habitat. If indirect impacts are potentially significant, the wetland is considered impacted, just as if the habitat were actually being removed. It is true that avoidance is required for wetlands and because of that, a slightly more fragmented design may be allowed for small, insignificant drainages to achieve the avoidance. But certainly, even those wetlands must be preserved in a manner such that indirect impacts are minimal just as with

upland habitats. Otherwise the wetland is considered impacted, just as is described in the previous comment instructing the smaller drainage to be considered a full impact within the development footprint.

6. It is not yet clear that no impacts will occur to the golden eagle nest located on the cliffs to the west of the site. No map has been provided showing the actual nest site in relation to the proposed development. Therefore, it is impossible to verify that the 4000 foot no disturbance zone requirement has been satisfied. There was also no discussion of the golden eagle report prepared by David Bittner of the Wildlife Research Institute (WRI) in the actual DEIR or biological report. Rather, page 33 of the biological report simply refers the reader to the report prepared by WRI included in the appendix. Given the important conclusions presented in WRI's report, the DEIR must recognize the potentially significant impacts and discuss mitigation measures and potential alternatives.

7. It is not clear why portions of the southern mixed chaparral (SMC) were mapped as the mafic variety versus the more common granitic chaparral. Typically, the more sensitive mafic designation is only applied when the soils are derived from gabbro or metavolcanic geological features. USGS soil maps do indicate Friant-Escondido soils to the west, with a very small area extending onto the actual project site. However, as the biological report states on page 9, only about 5 acres of the site are mapped as having this soil type, with the remaining being granitic in nature. Page 11 of the report discusses the discrepancy between mapped soil types and the mapping of mafic versus granitic chaparral. However, not enough justification is provided for labeling 26.74 acres as mafic simply based on the presence of certain species along the trail. Had the entire 26.74 acres been surveyed and rare plants found throughout, then it may be possible to consider this much of the area mafic SMC. However, only the areas along the trail were subjected to focused rare plant surveys, which does not justify labeling several hundred feet from the trails as mafic. Please revise the mapping accordingly or provide further justification.

8. Please revise the discussion of impacts to the California gnatcatcher to recognize the individual that was previously identified on the site (and as described in earlier biological information submitted for this project). A copy of that previous report or a full disclosure of the information provided therein (including the location of the gnatcatcher sighted) must be included in the current report. While 1999 focused surveys were negative, it is possible that gnatcatchers utilized the site before and after these surveys. In addition to describing future impacts caused by the project, the report should address the possibility that the clearing of coastal sage scrub in portions of the site for septic testing may have caused impacts to this species.

9. No lighting will be allowed within the riparian corridor in the north, which is considered the most likely path for wildlife movement. Either all lighting must be removed from the plot plan within 100 feet of these areas or a lighting study must be done to show that no lighting will fall within the riparian vegetation.

10. The DEIR and biological report do not yet adequately identify the probable extent and location of indirect impacts on the vegetation adjacent to the various proposed uses. Obviously, some uses will have a higher likelihood that accidental and/or purposeful excursions into the vegetation will occur. For instance, the nature center proposes to use the native habitat as an educational tool and yet this is not discussed as a potential impact. Other areas will have varying levels of encroachment and each should be considered in the mapping of the development footprint and the analysis of impacts.

11. Please ensure that all fire-clearing requirements are included within the development footprint. An updated letter from the fire district should be provided stating their requirements, including any standard regulations (i.e. 100 feet from structures) and any requirements specific to this project (i.e. from bleachers, fire rings, etc.).

12. Please discuss any off-site improvements that are necessary for implementation of this project, such as pipeline extensions or road improvements. If no off-site improvements are required, then the biological report should clearly state this. If improvements are required, the biological resources map must clearly show the extent of the improvements and any impacts must be included in the analysis.

13. Please revise all landscaping plans to include only native species within 100 feet of open space (as required by Section 1.10 of the County MSCP Subarea Plan). The remaining areas within the development footprint may follow the recommendation in the report, which is to allow non-native, ornamental species that are not considered invasive.

14. Please provide a table in the DEIR and biological report which clearly outlines the following information: vegetation communities present on the site, the existing acreage on-site (before any clearing occurred), proposed impacts, applicable mitigation ratios, required mitigation and how those mitigation requirements are being met. The table must include all habitats found on-site, including urban/developed and disturbed habitats. The total acreage of all habitats found on-site must add to 578 acres.

15. The biological report is slightly confusing in its treatment of oaks as individuals and woodland. Several references are made to how oaks were mapped and calculated for impacts, but each is slightly different in the information provided.

Please revise all references to oaks to state that when a woodland or riparian forest habitat is present, individual oaks do not need to be counted or mitigated separately. The habitat is treated as a whole. In woodland/riparian forest circumstances, Engelmann oaks should be identified on the biological resources map, but do not require additional mitigation above and beyond that required for the habitat as a whole. Individual oaks of any species (those found more than 50 feet from an oak woodland or riparian forest), must be identified on the biological resources map, considered impacted if within 50 feet of the development footprint and mitigated by the method described in the report. Finally, those individual oaks that are found within existing urban/developed habitats (i.e. between existing buildings, etc.), should be mapped, but do not require any mitigation as their biological value has already been diminished.

16. The revised Table S-1 (submitted after the DEIR and technical appendices) fails to mention impacts to southern mixed chaparral, non-native grassland or wetlands, all of which are considered sensitive habitats in the County and require mitigation for impacts to not be significant. This table should also describe the potentially significant impacts to golden eagles and wildlife corridors, which at this time are considered unmitigable with the current plot plans.

17. The DEIR and technical appendices make several incorrect statements about the MSCP and BMO. It appears some of the information provided may be from draft copies of MSCP related documents and/or from City of San Diego MSCP documents. The County Board of Supervisors adopted the County's Subarea Plan on October 22, 1997. No documents dated before this approval should be referenced or used in the preparation of County documents. Furthermore, the only City of San Diego document that applies to the County's implementation of the MSCP is the Final MSCP Plan, which the City produced in August of 1998. This document is briefly referred to in the County's documents, mainly for the requirements outlined in Table 3-5. Terms such as "MHPA" are not County terms and should be removed from the DEIR. Additional corrections include: the statement that the Metro-Lakeside-Jamul Segment is divided into two parts (it is not divided); the quote from the BMO on pages 2.5-4 and 2.5-13 is not from the documents adopted from the Board; and the statement on page 61 of the biological report that no more than 25% of a BRCA site may be impacted should be removed – this is not a project requirement, but a general goal of the MSCP.

18. The statement on page 2.5-8 of the DEIR regarding the BRCA status of the southern mixed chaparral is incorrect. The entire site is considered a BRCA based on the BRCA criteria outlined in the BMO. The BRCA status applies to all habitat types, regardless of Tiers or quality.

19. Please add the wording "may be as much as" when mentioning the potential 14,500 acres that may be preserved in the area surrounding the site. Since this land has not yet been acquired by a public agency, its preservation is not guaranteed. Clarifying this fact will help avoid confusion during public review. ?

20. With regard to sensitive species:
    a. The statement in the methods section on page 8 of the biological report is not correct. Population estimates for certain species is necessary and is required for CEQA documents. Otherwise, educated decisions regarding the significance of impacts cannot be made. While these estimates of population size and density are not necessary for all species, they are necessary for any sensitive species detected or having a high probability of utilizing the site. The County provided a list of species considered sensitive in a previous letter – this list should be referred to for which require population estimates. Estimates may be achieved in a number of ways, but may include direct surveys or extrapolating from small sample sizes. All methods for calculating estimates should be described in the methods section of the report.
    b. All sensitive species (from the list provided by the County) either detected or having a strong potential to use the site must be discussed in the text of the biological report. As requested in our previous letter, staff stated that a table should outline the sensitive species with potential to occur and those with high potential or actually detected will require additional detail in the text. This has not yet been done.
    c. More justification is needed for the statements in Table 3 and in the text regarding the significance of impacts to each of the sensitive species identified on the site. More evidence must be provided before concluding impacts are not significant. As biologists, County staff may agree (or disagree) with the statements made in the report based on their own expertise and knowledge of the species in question. However, the County cannot approve a project based on abstract assumptions alone. The DEIR and biological report must provide legally defensible evidence of impacts. This may require more fieldwork or simply providing more data from the previous surveys. It may also be helpful to discuss the environmental requirements for each species in greater detail, such as the habitat, soils, elevation and any predator-prey requirements.
    d. Further justification should be provided that no impacts will occur to *Senecio ganderi*, *Horkelia truncata* and *Monardella hypoleuca* ssp. *lanata*. Staff has concerns that use of the trail will allow substantial indirect impacts to affect these species, particularly since all three are Narrow Endemics and two of these three are Critical Populations in the MSCP. Stronger mitigation measures may be necessary, such as fencing groups of these plants, monitoring of these individuals as a condition of the use permit and/or providing structural mechanisms to limit the use of the trail to pedestrians

only. Please discuss the potential for indirect impacts in terms of expected use of the trail and probable encroachment. In addition, please provide an estimate of the total population sizes, using the areas surveyed as a sample density and estimate what percentage of this population is within 100 feet of the trail. From this information, possible mitigation measures should be proposed.
    e. The report incorrectly states on page 28 that *Selaginella cinerascens* (ashy spike-moss) is no longer considered sensitive. This species continues to be a Group D species on the County Rare Plant List and as such, requires discussion in the text of the report.
    f. Please change the word "vertebrates" on page 30 to "wildlife" as Quino checkerspot butterfly is discussed.
    g. Given that its host plant is present, please discuss the potential for Harbison dun skipper to be present on the site.
    h. Several species are mentioned in the text as being found on the site, but are not included in Appendix 2 of the report (the faunal checklist of species observed), including, but may not be limited to the San Diego desert woodrat and the San Diego pocket mouse. Please revise the list and text to match.
    i. Please revise the statements regarding Quino checkerspot butterfly. The report currently states that no known sightings have occurred in the area of the site. A confirmed sighting occurred during the 2001 surveys just south of this site not far from Mussey Grade Road (on the property formally owned by the Boys and Girls Club). !
    j. The results of the surveys/trapping for Stephen's kangaroo rat should be discussed on pages 31-33 along with the other focused survey results. In addition, please provide the USFWS permit number under which Philippe Vergne performed the SKR surveys.

21. The report describes the disturbed areas as including access roads for percolation testing and the actual percolation sites. Any disturbance related to the implementation of this project must be included in the current impact analysis. All of these testing locations and related roads must be mapped as the habitat that was present prior to the disturbance. Please revise the mapping and text accordingly.

22. None of the impacts described on page 41 of the report under Wetlands and Non-Wetland Waters Indirect Impacts will be allowed pursuant to the County's Stormwater Ordinance. All of these indirect impacts must be prevented through the use of Best Management Practices and various stormwater run-off prevention measures. The text should be revised to state these impacts would not occur as a result of this project.

VI. THE FOLLOWING COMMENTS WERE MADE BY DPLU NOISE SPECIALIST JOHN BENNETT:

Staff has reviewed the Specific Plan, the Draft EIR, and the revised Environmental Noise Analysis dated July 27, 2001 by Gordon Bricken and Associates for this proposed project. Staff notes that the project submittal now contains a Specific Plan in Appendix A that is based on the goals and policies set forth in the San Diego County General Plan and includes the Ramona Community Plan and Design Guidelines, the San Diego Zoning Ordinance, and the County Resource Protection Ordinance (RPO). Staff has considered noise issues in this review and shall comment on the applicable standards and criteria related to this topic with respect to the Specific Plan, the Draft EIR, and the Environmental Noise Analysis. Staff assumes that all six phases of the 20-year plan are being considered in this proposed project. Staff notes generally that the analysis of environmental noise impacts is incomplete at this time and requires revision. Staff also notes that the revised extended study for noise was not submitted in underline/strikeout format as required by the County letter of July 5, 2001. The following are staff noise comments about the three documents included in this second iteration submittal:

Specific Plan (Appendix A)

1. Staff requires a more complete statement of the goals and standards related to local noise issues in the community of Ramona. On pages 4 and 42 of Appendix A, there is a discussion about the standards and criteria that shall be considered in the development of the Ramona community that included both the General Plan and the Ramona Community Plan. On page 42, only the general goal has been identified in the Ramona Community Plan about environmental noise. The Ramona Community Plan imposes more stringent requirements on noise impacts to residential developments. Chapter 6 for "NOISE" in the Ramona Community Plan includes the following Policies and Recommendations:

- Permit residential development within projected CNEL contours of 55 dB(A) near main roads, airports, or other noise sources only when noise impacts can be mitigated.
- New development proposed within the projected noise contours exceeding CNEL 55 dB(A) will require buffering or other mitigation devices to return the ambient noise level to CNEL 55 dB(A).

Staff notes that is a more stringent noise standard that has been adopted in Ramona compared to the Noise Element of the General Plan. The technical noise study and the Draft EIR must therefore address this standard along with the Noise Element and the Noise Ordinance in the analysis and recommendations for the proposed project.

Draft EIR

2. Staff requires the Draft EIR to state accurately the first goal of policy 4b in the Noise Element on page 2.7-2. Noise sensitive areas are ideally not subjected to noise in excess of 55 decibels CNEL and not five decibels.

3. Staff requires the Draft EIR to include the noise policies and recommendations of the Ramona Community Plan as noted in the first staff comment. This more stringent threshold will also affect subsequent statements about the existing noise levels along Mussey Grade Road and the location of noise sensitive contours with respect to the proposed project (page 2.7-3) for off-site traffic.

4. Staff requires a correction or explanation of the omission of Figure 2.7-1 mentioned under Impact 2.7.a on page 2.7-5. Staff wishes to verify that the locations A, B, C, and D in their evaluation of noise impacts. Staff expects that these model receptors to be located at the point closest to the noise source(s) along the relevant property line as stated in the County Noise Ordinance discussion on page 2.7-3. Staff may require additional model receptors to identify more sensitive locations along the project's property lines.

5. Staff requires a discussion and supporting analysis in Appendix D of potential noise impacts from construction noise that would affect sensitive biological habitat in the vicinity of the project including Diegan Coastal Scrub, Coastal Sage-Chaparral Scrub, and Southern Live Oak Riparian Woodland as noted on page 2.7-2.

6. Staff requires a correction or explanation of the omission of Figure 2.7-2 mentioned in the discussion about Impact 2.7.f beginning on page 2.7-6.

7. Staff requires a more complete analysis of the potential noise impacts from maintenance equipment to adjacent property lines and the corresponding noise limits. On page 2.7-7, staff has noted the use of the exemption in Section 36.417(d) of the County Noise Ordinance for the maintenance of *residential* properties. However, the County planner agrees with staff that this project is a Major Use Permit that does not a residential status to any of the proposed uses. Appendix D needs to consider these impacts and make suitable recommendations about possible mitigation measurements.

8. Staff requires a figure in either the DEIR or Appendix D that shows the proposed location of the eight-foot tall noise attenuation barrier located on the east side of the RV parking area as noted on page 2.7-8.

9. Staff notes that the Major Use Permit application shall demonstrate that all activities will comply with the noise limits defined in the County Noise Ordinance (Section 36.404). Mitigation Measure 2.7b may not omit the requirement of mitigation measures and procedures to achieve this goal. Appendix D needs to provide the supporting analysis and recommendations on the subject of band practice and sporting/play activities.

Environmental Noise Analysis (Appendix D)

10. Staff requires that each submission of a technical study meet the County requirements of an underline/strikeout format for CEQA review. The present material submitted to the County does not use this format and a prior arrangement with the County's lead analyst is required to use an alternate format for submission. Any future submission shall be rejected for County CEQA review and still be counted as an iteration in the applicant's project processing.

11. As noted in staff's comment about the Specific Plan, staff requires a supporting environmental noise analysis that evaluates impacts for the threshold of 55 decibels (dBA) CNEL from the Ramona Community Plan in addition to the County Noise Element.

12. On page 13, staff requires a notation for the tabulated horizon-related noise contour estimates that indicates traffic speeds used for the project at the buildout condition.

13. Staff requires entries for table 8 and 12 that state the distance from centerline for the 55 decibel (dBA) CNEL contour.

14. Based on the fourth comment on page 14 and the information in tables 8 and 12, staff requires a scaled figure that shows the location of the 55 and 60 dBA contours across the project site for the worst-case estimate of future or existing levels of traffic noise.

15. Staff notes that Exhibits 2 and 3 show that the receptor locations A, B, C, and D may not be located at the nearest property line location. Staff requires enough model receptor locations along the property line that the analysis can demonstrate compliance to the County Noise Ordinance by not exceeding day/night one-hour average noise limits of 50/45 decibels (dBA). Staff requires at least two more model receptors at the property line around the Conference Center and a supporting analysis that agrees with the findings stated in the DEIR.

16. Staff requires clarification of any assumptions about the location of the mechanical equipment that begins on page 18. No roof plans or drawings have been appended to the analysis to show a possible configuration of equipment at a scale comparable to Figures 1-9 through 1-14 of the Draft EIR.

17. On page 21, staff requires a complete analysis for the impacts from maintenance equipment operations for the proposed project. Staff does not believe that the current project has a residential component to allow for an exemption from the Noise Ordinance (Section 36.417). Results from Table 18 need to be appended to the impacts due to other activities that will occur on site (Tables 16 and 17).

18. On page 21, staff requires the discussion of biological indirect noise impacts (Section 4.6) to include an analysis and recommendation about the temporary effects from the project's construction activities.

19. Staff requires Table 19 on page 23 to include project impacts from air-conditioners and construction activities for sensitive avian habitats noted in section 4.6.

20. Staff requires new tables for the recalculation of Tables 17 and 20 to show the resulting noise levels for the air-conditioner noise from the quieter equipment suggested in the first mitigation measure on page 24 with an ARI rating of 6.9 Bels.

21. On page 25, staff requires that the seventh mitigation measure for the sound amplification system state the performance criteria (sound pressure/power levels), location, and number of speakers in the designated Presentation areas.

22. On page 25, staff finds that the eighth mitigation measure of a variance for band practice and sporting activities does not furnish enough information about the long-term solution to this potential noise impact. Staff requires an analysis that provides a set of mitigation measures that will demonstrate the feasibility of reducing this impact to less than significant levels. Given this supporting evidence, staff may be able to recommend the use of a noise variance on a short-term basis for fine tuning the use of these measures to bring noise levels below the Noise Ordinance one-hour standard of 50 decibels (A).

23. Staff requires the details of the analysis associated with the design of the eight-foot tall noise barrier (page 26) around the east side of the RV parking lot. Staff requires a figure showing the wall locations in plan and profile views that includes the location of the noise sources and the property line model receptor.

VII. THE FOLLOWING COMMENTS WERE MADE BY DPLU LANDSCAPE ARCHITECT DAVID KAHLER:

The following corrections should be made on the landscape plans submitted. The applicant should be advised that the attached redlines must be returned with the revised plans when resubmitted. Requested corrections should be highlighted by indicating on what sheets the modifications took place. Any items that are not corrected must have an explanation as to why the changes were not made.

Requirements are based on the County of San Diego's Landscape Water Conservation Design Manual, the County of San Diego's Off-Street Parking Design Manual, and the Ramona Design Guidelines.

1. Provide a statement as to the type of irrigation that will be utilized for all new planting areas. A centrally controlled automatic irrigation system along with a rain sensing device is required. Verify with the appropriate Water District if the project requires irrigation products for reclaimed water (or for future reclaimed water). It is the responsibility of the irrigation designer to verify the need for reclaimed water products. (Typical all sheets)

2. Show parking lot landscaping per the County's Offstreet Parking Design Manual. "In parking areas with more than four (4) parking spaces, a minimum of 14 square feet of landscape for each space shall be provided. This landscaping shall be used in parking lot planters and/or for perimeter screening". One tree shall be planted for every 5 spaces. This is a typical requirement for all the proposed parking lots. (Typical sheets 13, 18, 23, and 33)

3. Provide shrubbery along the perimeter of all parking lots to help screen from view. Plants shall be a minimum of 30 inches in height after 2 years growth. Show locations and call out size and species. (Typical sheets 13, 18, 23, 33, and 33R)

4. All parking spaces shall be improved with a wheel stop a minimum of 6 inches high where the space is abutting: adjacent property, a building, a landscape area, or a walkway. (Typical sheets 13, 18, 28, 33, and 33R)

5. All planting beds shall receive a minimum of 2" of organic mulch. (Typical all sheets)

6. Provide a typical plant palette for each Plan area - call out common/botanical names and proposed sizes. (Typical all sheets)

7. Provide more information on types of plantings proposed for the Fire Protection Areas. (Typical sheets 8, 13, 18, 28, 33, and 33R)

8. Show pedestrian circulation routes and pathways between buildings, from parking lots to buildings, to tennis courts/basketball courts, etc. (Typical sheets 8, 13, 18, 33, and 33R)

9. Area #1 - provide more information (species, sizes) on proposed plantings - specifically, the meadow plantings, oakland understory, and slope plantings.

10. Area #2 - provide additional parking lot trees, provide more information on the type of erosion control plantings proposed for the drainage basin, and show what is proposed for the area between buildings.

11. Area #3 - show retaining wall heights, parking lot trees/shrubs, plant legend, cul-de-sac surface treatment type, and indicate types of groundcovers proposed. No invasive plant species shall be allowed next to the natural vegetation areas - please review. Show the shape of the forecourt (as shown on sheet 40) and the proposed ornamental accent tree locations. Indicate types of proposed hardscape between buildings (dining facility). Show planting in front of proposed retaining walls.

12. Area #3 - detail on sheet 40 shows a different layout for access to multi-function building and theater w/plaza and stairs. Tree planting is also shown differently from the conceptual landscape plan. Please clarify - all plans must match in layout and configuration.

13. Area #4 - show access to the tennis courts, fencing around pool area, label hardscape/pergola (indicate type of material), and a plant legend.

14. Area #5 - explain how the existing resource area is to be removed and revegetated (provide species and sizes). Show tree/shrub planting for parking lot in upper left hand corner of sheet (w/ret. walls). Will the RV parking lot stay gravel - if so, why provide drainage catch basins? Show access to yurt camping area. How will access to the maintenance and storage building be provided - what is the surface treatment proposed for this area - and how will potential pollutants (chemicals, fertilizers, etc) be kept from contaminating the groundwater?

15. Area #6 - label pathways/pergola's, show screening of tennis courts, label hardscape, and provide parking lot trees. Show access to the tennis courts, and provide a planting legend w/groundcovers called out.

16. Area #6A - (replaces area #5) - this plan proposes a road and parking through the resource area (previously shown as a revegetation area) - please explain intent. Will the Yurt Camping stay in the same place as shown on sheet 28? Show access to the tennis courts. How will the overflow (potential) from the drainage basins be diverted away from draining off-site? Need to clarify and indicate what the symbols represent - it is difficult to determine what is proposed in some areas (ie. parking lots - need trees, can't tell what is tree or shrub graphically). Show additional screening along the property line as shown on sheet 28. What happens to the remaining resource area that is not impacted by the road and parking? Will the activity building and pool area replace the one shown on sheet 33? Provide access to the guest housing.

17. Sheet 48 - provide proposed sizes of pine trees for screening the water tank. Provide additional shrubs in amongst the trees to help screen the tank.

VIII. THE FOLLOWING COMMENTS WERE MADE BY DPW ROUTE LOCATIONS PROJECT MANAGER ROBERT GORALKA

Route locations staff has reviewed the following revised documents for the Salvation Army Divisional Camp and Retreat Project in Sierra Del Mar (SP00-06/TK0379):

- 2nd Screen Check Draft EIR for Salvation Army Divisional Camp and Retreat Specific Plan prepared by BRG Consulting, Inc. dated August 20, 2001
- Draft Specific Plan for Salvation Army Divisional Camp and Retreat Specific Plan prepared by BRG Consulting, Inc. dated August 20, 2001
- Traffic Impact Analysis (TIA) for Salvation Army Sierra Del Mar Divisional Camp prepared by Linscott, Law, & Greenspan revised August 6, 2001

Our previous comments from our section's letter dated August 16, 2000, have been adequately addressed in the above documents. Based on the revised documents, the following comment(s) should be addressed:

1. On pages 34 and 35, the Draft Specific Plan states that a new area of 1.5 acres would be dedicated to vehicular parking and that parking to support the maximum population onsite would be 188 spaces. The TIA, pages 26 and 25, states that 188 parking spaces (approximately 1.29 acres) are required for a typical off-season day, but that a special event could accommodate up to 700 people, which would require 299 parking spaces (approximately 2.05 acres). Neither report states how the project will accommodate parking for a special event. There must be sufficient parking to accommodate any event that the project may hold. Identify how and

where parking will provided during special events.

2. The mitigation measure for the Mussey Grade Road intersection ($4,000) should be coordinated with Caltrans and the fairshare amount verified. ?

IX. THE FOLLOWING COMMENTS WERE MADE BY DPLU PROJECT MANAGER JOSEPH FARACE

Specific Plan/Plot Plan Comments:

Specific Plan:

1) Page 1: First paragraph, revise the reference to the "original" Major Use Permit to P70-379 delete the "W".

2) Page 1: First paragraph, referenced the issuance of a Resource Ordinance Permit. No such permit will be issued, the project must comply to Resource Protection Ordinance requirements.

3) Page 4: Second paragraph, references the family residential portion of Phase V, however Table 1 on the following page makes no mention of the family residential use. Please clarify.

4) Page 10: under B. Topography and Soils, it would also be prudent to mention within the steep slope analysis that a steep slope open space easement is not required pursuant to Section 5.b of RPO. This will provide the reader the reason why an easement is not provided. Please include this reference to other per parts of the Specific Plan text which include steep sloops and RPO language.

5) Page 13: under H Surrounding Land Use/Community Character, the text provides an adequate description of surrounding land use, however the description of the community character can be improved. Discuss the feel someone would get when traveling through the area.

6) On Figures 7 through 12 remove to reference to "Landscape Concept" from the plans. This give the impression that we a reviewing a landscape plan.

7) Page 33, Table 4: the total land area equates to 574.42 acres. The total land area referenced in the text is 578 acres. Please clarify the slight discrepancy in total land area.

8) Page 39: under 7 Lighting Plan, is any play field lighting be proposed?

9) Page 40: under B Water Service, are the wells which are currently not used proposed to used as part of the project? What will they be used for? It appears from the text that the only water used will be piped public water and stored water within the storage tanks. Please clarify.

10) Page 67: under 7. Conservation, indicate that amount of area to be disturbed as a result of the project versus how much land is being conserved (undeveloped) land on the project site.

11) As an attachment add some typical building elevations of building's on site which show the type of rural/rustic architecture proposed on the site.

12) Include a specific plan map within the bound text. The map is usually prided within a sleeve at the end of the text.

* The replacement specific plan text shall be in a strike-out/underline format.

Plot Plan:

1) Sheet 3 of the submitted plot plan, "Proposed Plot Plan" should contain a land use summary which has such information including but not limited to; total project area, developable project area, existing building square footage and proposed building square footage due to the expansion, a parking analysis etc... This will be a comprehensive overview of the project on the plot plan.

2) Provide an enlarged detail sheet of the RV parking area. The RV component of the plot plan will need to be reviewed for compliance with Section 6450 of the Zoning Ordinance pertaining to Recreational Vehicle Park Regulations. The purpose of these regulations is to ensure that RV parks meet minimum standards of habitability. Please ensure that the RV parking area is consistent with this Section of the Zoning Ordinance.

3) The alternate project site plans and floor plans will need to be removed from the plot plan set once the project goes to hearing.

4) Remove the word conceptual from all the building elevation sheets. What will be ultimately built on the site must be in compliance with the approved plot plan set.

5) Although dimensions are shown on the floor plans please indicate the square footage each building. Some irregular shaped buildings make it difficult to calculate the building's square footage.

6) Please provide an explanation of what the symbols mean on the mechanical plans.

7) The sheets labeled electrical plans should be revised to indicate lighting plans.

8) Provide light elevations of the five proposed light types used on the site. Include pertinent lighting specifications, i.e. low pressure sodium.

If you have any specific questions regarding these EIR comments, please contact Glenn S. Russell, Project Environmental Analyst at (858)694-2981 or e-mail at grussepl@co.san-diego.ca.us.

PROJECT SCHEDULE: Your project is presently behind schedule. An updated copy of your project schedule is attached showing an estimated hearing/decision date of 11/11/02. This date is approximately eleven months later than originally anticipated. The reason for the project falling behind schedule was the need for time extensions to revise the draft EIR.

SUBMITTAL REQUIREMENTS: Unless other agreements have been made with County staff, you must comply with the following submittal requirements in order to make adequate progress and to minimize the time and costs in the processing of your application:

1. Submit a copy of this letter.

2. Submit a separate letter that indicates specifically where and how each of the above comments is addressed in the revised EIR/information/documents. For simple comments it is acceptable to merely reference the document, page and paragraph number were the strikeout/underline revisions have been made. Otherwise, the rationale for the revisions (or lack of revisions) must be given.

3. Submit the following information and/or document(s) with the requested number of copies as specified. **The Project Number and/or Environmental Log Number must be clearly and visibly labeled on all submitted documents. All changes to the document(s) must be in strikeout/underline format.**

INFORMATION/DOCUMENT	NO. OF COPIES	LEAD REVIEW/SECTION OR DEPT
Revised Screencheck Draft EIR	7	DPLU
Any applicable revisions to technical studies	7	DPLU
Replacement Specific Plan Text	7	DPLU
Replacement Plot Plan	6	DPLU

To assure timely and cost-effective processing of your project, all items must be submitted concurrently and delivered to the DPLU Zoning Counter at 5201 Ruffin Road, Suite B, San Diego, California 92123-1666.

RESUBMITTAL DUE DATE: In order to maintain adequate progress in processing of your project, the DPLU requires that all of the revisions/information to the screencheck draft EIR requested in this letter be submitted in conformance with the above submittal requirements by 11/7/01. Please note that an extension of this date may be granted at the discretion of the Director of the DPLU. To request an extension, submit a written request, signed and dated by the project applicant. The request must include the proposed new submittal date and a brief reasoning for the extension request. If the revised screencheck draft EIR is not received, or an approved extension request is not granted by the Director by the above date, the Department may make a recommendation for denial of your project to the appropriate decision-making authority based upon inadequate progress pursuant to CEQA Guidelines Section 15109.

If you have any questions regarding this request, please contact me at (858) 694-3690 or by e-mail at jfaracpl@co.san-diego.ca.us.

Sincerely,

Joseph Farace, Project Manager
Current Planning

JF:GR

Attachments

cc: Kiersten Giugno, Senior Project Manager, BRG Consulting, Inc., 1550 Hotel Circle Drive North, Suite 320, San Diego, CA 92108-2909
Michael Matalon, Matalon Architecture and Planning, 7596 Eaps Ave. Suite 120, San Diego. CA 92101

Ken Brazell, Project Manager, Department of Public Works, M.S. O336
Glenn Russell, Project Analyst, Department of Public Planning and Land Use M.S. O650
Susan Porter, Regional Planner, Department of Planning and Land Use, M.S. O650
John Peterson, CEQA Regulatory Manager, Department of Planning and Land Use, M.S. O650
Mark Mead, County Counsel

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ERIC T. PROSSER

OF COUNSEL
PAUL A. PETERSON

File No.
5492.001
Via Fax

November 7, 2001

Mr. Eric Gibson, Chief
Department of Land Use
County of San Diego
5201 Ruffin Rd., Ste. B
San Diego, CA 92123-1666

Re: Salvation Army Divisional Camp and Retreat
EIR; MUP70-379W2; ER 98-14-023; SCH 2000031058
2ND Screen Check Draft EIR, Specific Plan Text and Landscape Plans

Dear Eric:

As we indicated to you at the October 24, 2001 meeting, our project team was somewhat surprised at the County of San Diego Department of Planning & Land Use letter of October 8, 2001.

As you will recall on August 16, 2000, the County issued a 21-page review and comment letter on the 1st Screen Check Draft EIR and Specific Plan. At that point, our client's design team conducted all of the additional studies, completely redesigned the project, and responded on a point-by-point basis. As you can imagine, this was an extremely costly and time-consuming effort.

RECEIVED
NOV 09 2001
SAN DIEGO COUNTY
DEPT. OF PLANNING & LAND USE

ESTIMATED PROCESSING SCHEDULE

Project Name: Salvation Army Divisional Camp and Retreat
Project Number: P70-379W2; LOG 98-14-023
Staff Completing Schedule: Glenn Russell
Decision-Making Body: Planning Commission and Board of Supervisors
Date Schedule Produced/Revised. 10/08/2001

TASK/ACTIVITY	Estimated Duration	Estimated Completion Date	Actual Completion Date
APPLICATION SUBMITTAL			08/20/1998
DPLU reviews for application "completeness", determines project issues, costs and schedule	30	09/21/1998	
DPLU completes Environmental Initial Study	30	10/21/1998	
DPLU completes Initial Scoping of EIR	14	11/04/1998	
Applicant submits draft Notice of Preparation	*45*	*12/21/1998*	*02/22/2000*
DPLU finalizes, advertises and distributes Notice of Preparation	*14*	*03/09/2000*	03/16/2000
Public review of Notice of Preparation	*30*	*04/17/2000*	
DPLU receives and distributes public comments on Notice of Preparation to Applicant	*10*	*04/27/2000*	
Applicant Submits 1st Draft EIR	180	05/03/1999	06/19/2000
DPLU Reviews 1st Draft EIR	45	08/03/2000	08/16/2000
Applicant Submits 2nd Draft EIR*	45	10/02/2000	08/20/2001
DPLU Reviews 2nd Draft EIR*	30	09/19/2001	10/08/2001
Applicant Submits 3rd Draft EIR*	30	11/07/2001	
DPLU Reviews 3rd Draft EIR*	21	11/28/2001	
Env. Coordinator Review of Draft EIR	3	12/03/2001	
1st County Counsel Review of Draft EIR	30	01/02/2002	
DPLU receives and distributes Counsel comments to applicant	5	01/07/2002	
Applicant revises Draft EIR*	21	01/28/2002	
Env. Coordinator Review of Draft EIR*	3	01/31/2002	
2nd County Counsel Review of Draft EIR*	30	03/04/2002	
DPLU receives and distributes Counsel comments to applicant*	5	03/11/2002	
Applicant makes final changes to Draft EIR, produces copies & F & G Fees	*14*	*03/25/2002*	
DPLU completes distribution paperwork, advertises and distributes EIR	17	03/28/2002	
Public review of Draft EIR	45	05/13/2002	
Applicant completes draft CEQA Findings/Override	*55*	*05/22/2002*	
DPLU receives and distributes public comments to applicant	10	05/23/2002	
DPLU reviews draft CEQA Findings/Override	*21*	*06/12/2002*	
Applicant submits first draft Responses to Public Comment	21	06/13/2002	
DPLU reviews first draft Responses to Public Comment	14	06/27/2002	
Applicant revises EIR, CEQA Findings/Override, and Responses to Public Comment	14	07/11/2002	
Environmental Coordinator Review of CEQA Documentation	3	07/15/2002	
County Counsel Review of CEQA Documentation	20	08/05/2002	
Applicant finalizes EIR, CEQA Findings/Override, and Responses to Public Comment	14	08/19/2002	
DPLU finalizes documentation	10	08/29/2002	
DPLU completes final documents, dockets project and initial **PROJECT HEARING/DECISION**	72	11/11/2002	

Total Estimated Duration 221 weeks
50.9 months

Bolded tasks are under the control of applicant/consultant.
Italicized tasks are completed concurrently with other tasks.
* - Task can be eliminated if earlier draft documents are adequate.

Assumptions:

Project will be completed using an Environmental Impact Report.
The project is considered "sensitive" pursuant to Board Policy I-119 therefore County Counsel review will be required.
Applicant/consultant will provide adequate Environmental Impact Report in three iterations or less.
Applicant/Consultant will submit all required information in accordance with the estimated schedule/turnaround times.
The project will not be continued by the decision-making body nor appealed.
Any Department of Public Works or Department of Environmental Health issues will be resolved concurrently with the environmental process.

The Hearing/De ate is subject to Decision-Making Body availability and schedule.
Dates which fal holiday will have an actual completion date the first business day after such holiday.

Following submission of the 2nd Screen Check Draft EIR to the County, on August 20, 2001, we received the October 8, 2001 letter which contained 35 pages of review comments and 24 totally new issues. In addition to new studies that were requested by your staff, there were also "policy" recommendations which directly conflict with the previous direction that our team had received. The most significant of the new items was related to biological issues.

As you may or may not know, back in March 2001, our team specifically requested a site meeting with Ms. Dawn Dickman (and anyone else that she felt would be appropriate) to get clear direction from the County concerning biological issues including mapping, appropriate buffers, and mitigation ratios. At that time the requested meeting on site was denied because staff wanted to see a much more detailed and comprehensive RPO impacts analysis.

While we were encouraged by the meeting with you and County staff on October 24, 2001 that Ms. Dickman could not attend, the major biological issues have still not been resolved. As you know, we contacted you during the last week of October and you assured me that your staff would meet with our client's Biologist on site to resolve all of the remaining issues. Following that, Kiersten Giugno of BRG Consulting emailed

Ms. Dickman on October 31, 2001 requesting a meeting within the next seven days. To date, Ms. Dickman has not responded to the requests.

Unfortunately without clear and definitive direction from the County, our team cannot complete the environmental analysis (which will then dictate whether or not any further revisions will need to be made to the requested Specific Plan and Major Use Permit). Since the Department of Planning and Land Use has requested additional studies and information, and has not been able to provide the needed direction, we assume that the County will be extending the requested resubmission date of November 7, 2001 to an appropriate time after the County has provided our client's design team with the direction it has requested.

Even though we directed our client's Consultants to proceed with as much work as they can, we are strongly of the belief that a "piecemeal" submission of this project will result in delays, confusion, complications, and excessive cost and expense to our client.

We would appreciate hearing from you as soon as possible to determine when the site visit can occur so that our client's design team can complete the necessary studies and resubmit the project.

Mr. Eric Gibson, Chief
Department of Land Use
County of San Diego
November 7, 2001
Page 4

Thank you for your courtesy.

Sincerely,

PETERSON & PRICE
A Professional Corporation

Matthew A. Peterson

cc: Gary Pryor, Director, DPLU
David S. Hulse, AICP, Chief, DPLU
Mark Mead, Chief Deputy County Counsel
Glenn S. Russell, Project Analyst, DPLU
Joseph Farace, Project Manager, DPLU
John Peterson, CEQA Regulatory Manager, DPLU
David Hudson, Major, Divisional Secretary, The Salvation Army
Michael B. Matalon, AIA, MATALON Architecture & Planning
Kiersten R. Giugno, Project Manager, BRG Consulting, Inc.

MUSSEY GRADE ROAD ALLIANCE
P.O. B. 683
RAMONA, CALIFORNIA 92065

FAX FORM

TO: GARY PRYOR
DIRECTOR
DEPARTMENT OF PLANNING AND LAND USE
COUNTY OF SAN DIEGO

FROM: DIANE CONKLIN
SPOKESPERSON
MUSSEY GRADE ROAD ALLIANCE

DATE: NOVEMBER 8, 2001

FAX #: (858) 694 - 2555

NUMBER OF PAGES INCLUDING THIS PAGE: 5

PLEASE DELIVER UPON RECEIPT

MUSSEY GRADE ROAD ALLIANCE
P.O. BOX 683
RAMONA, CA 92065

Steering Committee:
Diane Conklin, Member/Spokesperson
Mel Kettner, Member
Carol Levin, Member
Bruce Meador, Member
Donna Schneider, Member
Ann Varnado, Member

(760) 787 - 0794 T
(760) 788 - 5479 F

November 8, 2001

BY FAX

Mr. Gary L. Pryor
Director
Department of Planning and Land Use
County of San Diego

Re: Salvation Army Missed Deadline (Reference: MUP70-379W2)

Dear Mr. Pryor:

The Mussey Grade Road Alliance is a grassroots citizen organization dedicated to the preservation and protection of historic Mussey Grade Road and environs in Ramona, California. We oppose the Salvation Army's proposed expansion of its Major Use Permit at its Camp and Conference Center located on Mussey Grade Road based on its massive scale, which is totally inappropriate to the rural community of Ramona and to the biologically sensitive Resource Conservation Area (RCA) of Mussy Grade Road (RCA #14).

The Army submitted its application for this project in August of 1998. As you know, in the spring of this year we brought to the Board of Supervisors' attention the Army's repeated delays, numerous requests for extensions and general foot-dragging concerning the processing of this application by the Department of Planning and Land Use (see attached DPLU 2-page information note on project scheduling for this project). We asked the Board for a meeting with you to discuss these problems.

At the direction of the Board, you met with several of the MGRA Steering Committee Members on May 2, 2001. You directly stated at that meeting that you would take the project forward for denial if the Salvation Army did not withdraw. However, when the Salavation Army's withdrawal letter was not accepted by the DPLU, you did not take the project forward for denial as you stated you would do (to myself, Bruce Meador, Ann Varnado and Art Bale). As a direct result of your non-action, we again approached the Board of Supervisors and, as a result of our second intervention, the county chief administrative officer commenced an investigation into the fairness of the process at the request of Supervisor Dianne Jacob.

That investigation was concluded with a letter sent to the Board and copied to individual members of the Mussey Grade Road Alliance. The July 26, 2001 letter was signed by Robert Copper for Chief Administrative Officer Walter F. Ekard. Despite the obvious and continual delays caused by the Salvation Army in the processing of its project, the letter stated in its essentials that the Army had met the County's requirements and could proceed.

I am writing to you today to inform you that the Salvation Army has once again missed a deadline. This time the deadline is for the Army's response to the DPLU's Second Iteration Review of the Screencheck Draft Environmental Impact Report (EIR), Specific Plan Text, and Landscape Plans, dated October 8, 2001, and signed by Project Manager Joseph Farace. The Army's response was due yesterday, November 7, 2001.

In the letter, the DPLU states at page 35:

"**RESUBMITTAL DUE DATE:** In order to maintain adequate progress in processing of your project, the DPLU requires that all of the revisions/information to the screencheck draft EIR requested in this letter be submitted in conformance with the above submittal requirements by 11/7/01. Please note that an extension of this date may be granted at the discretion of the Director of the DPLU. To request an extension, submit a written request, signed and dated by the project applicant. The request must include the proposed new submittal date and a brief reason for the extension request. If the revised screencheck draft EIR is not received, or an approved extension request is not granted by the Director by the above date, the Department may make a recommendation for denial of your project to the appropriate decision-making authority based upon inadequate progress pursuant to CEQA guidelines Section 15109." (Emphasis added)

In telephone conversations today Project Manager Mr. Farace, Lead Analyst Glenn Russell, and Ms. D.J. McLaughlin, who logs all incoming mail for the central DPLU database, told me that no submittal of revisions/information was received from the Salvation Army by the November 7, 2001 deadline. Furthermore, Mr. Farace and Mr. Russell both told me separately that neither had any knowledge of an Army extension request letter or any approved extension by you. Finally, Mr. Farace stated to me that as the project manager, he is the proper party to receive an extension request letter.

Therefore the Mussey Grade Road Alliance asserts that conditions have been more than met for you to move forward immediately for denial of the project. In light of the five extensions already granted to the Army and the documented and generally well-known history of this problematic project, which has consumed more than three years of county time with negligible results, no other action is reasonable or fair. On behalf of the Alliance, I ask you to inform me in writing of your decision within five working days of the date of this letter.

Sincerely,

Diane Conklin

Diane Conklin
Spokesperson

cc: Board of Supervisors; Joseph Farace/Glenn Russell

GARY L. PRYOR
DIRECTOR
(858) 694-2962

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
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TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
338 VIA VERA CRUZ - SUITE 201
SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. - SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

November 15, 2001

Diane Conklin
Mussey Grade Road Alliance
Post Office Box 683
Ramona, California 92065

SALVATION ARMY PROJECT

Dear Ms. Conklin:

As we discussed in our November 16, 2001 telephone conversation, the Department of Planning and Land Use has extended the project due date for submittals on the above project to December 7, 2001.

Sincerely,

GARY L. PRYOR, Director
Department of Planning and Land Use

GLP:eg

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November 16, 2001

The Salvation Army
Major David Hudson
825 Seventh Avenue
San Diego, CA 92101

RE: SALVATION ARMY DIVISIONAL CAMP AND RETREAT EIR; MUP 70-379W2; ER 98-14-023; SCH 2000031058; APPROVAL OF DUE DATE EXTENSION

Dear Major Hudson:

The Department has received your request for a due date in the form of an oral request made at our recent meeting on November 13, 2001 for submittal of information requested in the DPLU Second Iteration EIR Comment Letter dated 10/8/01. After reviewing your request and the circumstances of your project, the Department hereby grants approval of a 21-day due date extension from November 16, as discussed below. Therefore, the information/documents requested in the DPLU Second Iteration EIR Comment Letter dated 10/8/01 are now due on 12/7/01.

While the Director will generally be reluctant to grant further extensions of this due date, another extension may be considered based upon the submittal of a written request, signed and dated by either the project applicant or the designated point of contact for the project. The request must include the proposed revised timelines and a brief reasoning for the extension request. If the required additional information, or an extension request, is not received by the above extended due date, the Department will make a decision or hearing recommendation on your project based upon inadequate progress pursuant to California Environmental Quality Act Guidelines Section 15109.

I would like to take this opportunity to respond to Mathew Peterson's 11/7/01 letter to Eric Gibson. There are several issues raised in that letter that require clarification. That letter addressed "new" issues and policy changes that were brought up in the second screencheck EIR comment letter of 10/8/01. It is true that some of our policies concerning biological resources changed during the nearly one year between submission of the first and second screencheck Draft EIR. Also, given that, as Mr.

Peterson indicated, the client's team "completely redesigned the project" between the first and second screencheck, it is not surprising that there were some new comments.

Mr. Peterson also indicated in his letter that a request for a meeting on site with DPLU staff biologists was denied because DPLU staff wanted "a much more detailed and comprehensive RPO analysis." The requested meeting could not take place until an accurate impact and vegetation map was submitted to DPLU. The need for this map was not a new request and was included in the First Screencheck EIR Comment Letter (and earlier review letters), dated August 20, 2001. The map was finally submitted to DPLU on 11/13/01 and the requested on site meeting took place on 11/14/01, attended by DPLU staff Dawn Dickman and Brett Solomon, as well as a representative of California Department of Fish and Game and the consulting biologist. I trust that any unresolved biological issues were adequately addressed during the on site meeting.

The letter goes on to state that Kiersten Giugno e-mailed DPLU staff biologist Dawn Dickman on 10/31/01 requesting a meeting within seven days, and that Ms. Dickman never responded. Ms. Dickman never received such an e-mail from Ms. Giugno, but did meet with the project biologist on October 26 to discuss project biological issues. This meeting took place two days after the meeting between County staff, Gary Pryor, Mr. Peterson, and project consultants. Ms. Dickman was unable to attend the October 24 meeting because she was attending a conference on oak trees. At the October 26 meeting, Ms. Dickman discussed her comments contained in the Second Screencheck EIR Comment Letter and reiterated her request for an adequate vegetation and impact map in order that a fruitful on site meeting could take place. Now that the map has been submitted and the site visit has taken place, Ms. Dickman and DPLU staff biologist Brett Solomon are preparing summaries of the meeting that will include further direction to project biologists concerning what is necessary to achieve an adequate submission for the Third Screencheck EIR. This direction will be FAXed to you and your project consultants no later than November 16, 2001. The requested extension of 21 days will therefore begin at that time.

PROJECT SCHEDULE: Your project is presently behind schedule. An updated copy of your project schedule is attached showing an estimated hearing/decision date of 12/15/02. This date is approximately 12 months later than originally anticipated. The reason for the project falling behind schedule is the need for extensions to revise the project and EIR. If you have questions in regard to future submittals or additional due date extensions, please contact me at (858) 694-2962.

Sincerely,

GARY L. PRYOR, Director
Department of Planning and Land Use

GP:GR

Attachment: Project Schedule

cc: Kiersten Giugno, Senior Project Manager, BRG Consulting, Inc., 1550 Hotel Circle Drive North, Suite 320, San Diego, CA 92108-2909[NOTE:9]
Michael Matalon, Matalon Architecture and Planning, 7596 Eaps Ave. Suite 120, S.D. CA 92101
Mathew A. Peterson, Peterson & Price, Union Bank of California Building, 530 "B" Street, Suite 1700, San Diego, CA 92101-4454
Diane Conklin, Mussey Grade Road Alliance, Post Office Box 683, Ramona, CA 92065
Joseph Farace, Project Manager, Curent Planning, Department of Public Planning and Land Use, M.S. O650
Ken Brazell, Project Manager, Department of Public Works, M.S. O336
Glenn Russell, Project Analyst, Resource Planning, Department of Public Planning and Land Use, M.S. O650
John Gibson, Chief, Resource Planning, , Department of Public Planning and Land Use, M.S. O650
John Peterson, CEQA Regulatory Manager, Department of Planning and Land Use, M.S. O650
Mark Mead, County Counsel
File

RAMONA COMMUNITY PLANNING GROUP
POST OFFICE BOX 803, RAMONA, CALIFORNIA 92065
Phone: 760-789-3303 Fax: 789-789-3903

October 21, 2001

Joe Farace, Project Planner
Department of Planning and Land Use
5201 Ruffin Rd., Ste. B
San Diego, CA 92123

RE: MUP70-379W2RPL, SP00-06RPL, SALVATION ARMY DIVISIONAL CAMP AND RETREAT PRESENTATION, MUSSEY GRADE ROAD

Dear Mr. Farace:

At the meeting of the Ramona Community Planning Group October 4, 2001, the following recommendation was made:

MOTION: AS THIS PROJECT IS LESS THAN 10 PERCENT DIFFERENT FROM THE PROJECT PRESENTED TO US IN 1999, WHICH WE UNANIMOUSLY DENIED, AND IS RELEVANT TO THE FINDINGS WE MADE AND VOTED OUT IN NOVEMBER 2000, I THEREFORE MOVE TO DENY THIS APPLICATION ON THE BASIS OF ITS LACK OF HARMONY IN SCALE, BULK AND DENSITY WITH THE EXISTING NEIGHBORHOOD, ITS HARMFUL EFFECT ON THE DESIRABLE COMMUNITY CHARACTER, AND THE UNSOLVED FIRE DANGERS IT REPRESENTS. The Motion passed with 8 yes votes, 5 no votes, and 2 absent.

Another motion was made prior to this one: To not render a decision on the project until after we have had a chance to review the full EIR and public comment and discussion on the EIR. This motion failed with 6 yes votes, 7 no votes and 2 absent.

A substantial number of people came out to speak out on this project. Twelve people opposed to the project were Ramona residents, living on Mussey Grade Road. Of the fourteen people in favor of the project, two were an employee and his wife, and five did not live in Ramona.

The issues that were voiced against the project:

ESTIMATED PROCESSING SCHEDULE

Project Name: Salvation Army Divisional Camp and Retreat
Project Number: P70-379W2; LOG 98-14-023
Staff Completing Schedule: Glenn Russell
Decision-Making Body: Planning Commission and Board of Supervisors
Date Schedule Produced/Revised: 11/15/2001

TASK/ACTIVITY	Estimated Duration	Estimated Completion Date	Actual Completion Date
APPLICATION SUBMITTAL	30	08/21/1998	08/20/1998
DPLU reviews for application "completeness", determines project issues, costs and schedule	30	10/21/1998	
DPLU completes Environmental Initial Study	14	11/04/1998	
DPLU completes Initial Scoping of EIR	45	12/21/1998	02/22/2000
Applicant submits draft Notice of Preparation	14	03/09/2000	03/16/2000
DPLU mailers, advertises and distributes Notice of Preparation	30	04/17/2000	
DPLU receives and distributes public comments on Notice of Preparation to Applicant	10	05/27/2000	
Public review of Notice of Preparation	30	05/03/1998	08/18/2000
Applicant Submits 1st Draft EIR	45	06/03/2000	08/16/2000
DPLU Reviews 1st Draft EIR	30	10/02/2000	08/20/2001
Applicant Submits 2nd Draft EIR*	30	09/19/2001	10/08/2001
DPLU Reviews 2nd Draft EIR*	30	11/07/2001	12/07/2002
Applicant Submits 3rd Draft EIR*	21	12/30/2002	
DPLU Reviews 3rd Draft EIR*	3	01/02/2003	
Env. Coordinator Review of Draft EIR	30	02/02/2003	
1st County Counsel Review of Draft EIR	5	02/10/2003	
DPLU receives and distributes Counsel comments to applicant	21	03/03/2003	
Applicant revises Draft EIR*	5	03/05/2003	
Env. Coordinator Review of Draft EIR*	30	04/07/2003	
2nd County Counsel Review of Draft EIR*	5	04/14/2003	
DPLU receives and distributes Counsel comments to applicant*	14	04/28/2003	
Applicant makes final changes to Draft EIR, produces copies & F & G Fees	17	05/01/2003	
DPLU completes distribution paperwork, advertises and distributes EIR	45	06/16/2003	
Public review of Draft EIR	55	08/25/2003	
Applicant completes draft GEOA Findings/Override	10	08/26/2003	
DPLU receives and distributes public comments to applicant	21	09/16/2003	
DPLU reviews draft GEOA Findings/Override	21	07/17/2003	
Applicant submits first draft Responses to Public Comment	14	07/31/2003	
DPLU reviews first draft Responses to Public Comment	14	08/14/2003	
Applicant revises EIR, GEOA Findings/Override, and Responses to Public Comment	3	08/18/2003	
Environmental Coordinator Review of GEOA Documentation	20	09/08/2003	
County Counsel Review of GEOA Documentation	14	09/22/2003	
Applicant finalizes EIR, GEOA Findings/Override, and Responses to Public Comment	10	10/02/2003	
DPLU finalizes documentation	72	12/15/2003	
DPLU completes final documents, dockets project and initial PROJECT HEARING/DECISION			
Total Estimated Duration	278 weeks 64.1 months		

Bolded tasks are under the control of applicant/consultant.
Italicized tasks are completed concurrently with other tasks.
* Task can be eliminated if earlier draft documents are adequate.

Assumptions:
Project will be completed using an Environmental Impact Report.
The project is considered "sensitive" pursuant to Board Policy I-118 therefore County Counsel review will be required.
Applicant/Consultant will provide adequate Environmental Impact Report in three iterations or less.
Applicant/Consultant will submit all required information in accordance with the estimated schedule/turnaround times.
The project will not be continued by the decision-making body nor appealed.
Any Department of Public Works or Department of Environmental Health issues will be resolved concurrently with the environmental process.

This Hearing/Decision date is subject to Decision-Making Body availability and schedule.
Dates which fall upon a holiday will have an actual completion date the first business day after such holiday.

- The camp will be for children 2 months out of the year and rented out 10 months of the year. With 780 people allowed daily, this is a very commercial use. The camp expansion seems less focused on the children rather than the commercial use. This use will be more a Major resort than a children's camp.
- If they rent it out 10 months, what about the children 12 months of the year?
- This large camp is next to single residences.
- There will be 21 miles of leach lines in a core biological area. This is large impact in itself, but it will also impact the root systems of the oak trees.
- Residents in the area are on wells.
- There has been no reduction in the facilities which will cover 5 acres (one-quarter million square feet of buildings under roof). This will contribute in excessive runoff during the rainy season.
- Groceries will be trucked in, but all of the trash will go into our dump.
- Mussey Grade Road is a box canyon with one way in/out. In the event of a fire, even though it has been cleared and people can "stay", the wind can change, creating a situation that can cause smoke inhalation. Residents, including this camp, have been evacuated 3 times in the last 15 years due to fire.
- A representative of the Golden Eagle Ranch pointed out that his farm is next to the Salvation Army, and that it would be impossible to evacuate their horses in the event of a fire with the added traffic impacts from the Salvation Army Camp.
- With flames at the entrance of Mussey Grade Road, people on Mussey Grade Road will not be able to get out. Firemen will have a hard time getting in. No one can predict where fire will occur.
- Although buses create less vehicles than cars, they are more obstructive to traffic due to the rate of travel and maneuverability. The project would put more traffic on a dead-end road, and the area is developed too much already to add this use to it.
- If the road is improved to handle the excessive traffic that will occur with this project, we will lose the Oaks that line the roadway and the loss of Oaks will negate the beauty of the road. This road has been recommended for Historical status, part of the history in the recommendation referenced the old oaks.

Those people in favor of the project gave the following comments:

- This type of camp encourages young people to have a better life.
- Kids lives will be touched.
- 250,000 gallons will benefit the area.
- Adults and seniors will benefit from it, too.
- People who had worked there with the kids stated that it changes kids' lives.
- More cabin space, beds, and a dining hall are needed.
- Salvation Army goes into neighborhoods and helps neighbors.

The Ramona Community Planning Group appreciates that the wastewater treatment plant was eliminated from the project, that no groundwater will be used, and the cutting back on the RV spaces. We would like the children to have a great experience here.

However, as long as there can be 780 people at the camp at any time (conditionally limiting it to 780 a few times a time a year is also unacceptable), 5 acres of buildings, 21 miles of leach lines, and only one access/exit, this project is not for the children, nor will it work for Ramona.

This is the wrong piece of land for a project of so grandiose a scale. The camp has worked as it is for a number of years, and has been of benefit for the children who come. It is a small quiet place. We do not feel that the children will really benefit from an enlargement in size and population, and in fact will lose the benefit of a camp experience with the increased size.

Sincerely,

L. "Dutch" van Dierendonck, Chair
Ramona Community Planning Group

KM/

RECEIVED

SEP 13 1999

ARTMENT OF PLAN

Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
(760) 787-0794

September 7, 1999

San Diego County Department of Planning and Land Use
5201 Ruffin Road
San Diego, CA 92123
Attn: Tiffany Mueller

Re: Proposed Master Plan for the Salvation Army Sierra del Mar Divisional Camp and Conference Center, Major Use Permit #P70-379W.

Dear Ms. Mueller:

The Salvation Army purchased 575 acres located at 14488 Mussey Grade Road in Ramona from the First Presbyterian Church of San Diego in March of 1997. They now run what is called the Salvation Army Sierra del Mar Divisional Camp and Conference Center. The Salvation Army has submitted a Proposed Master Plan to the San Diego County Department of Planning and Land Use that would require an amendment to their existing Major Use Permit.

Presently, the camp consists of approximately 27 structures (totaling 31,375 ft²) with a maximum occupancy of 284. In their proposed master plan, the compound would be expanded to approximately 60 structures (totaling 263,400 ft²) with a maximum occupancy of 850. The structural density of the proposed project would be 13 to 40 times denser than that of the adjoining community – roughly the equivalent of 160 single-family homes in the area. At a maximum occupancy of 850, the population density would be over 1500% more dense than surrounding area, and the population of Ramona will increase by approximately 2.5%

The Mussey Grade Road area of Ramona is mainly rural residential and agricultural. Many citizens of Ramona feel that the Salvation Army's proposed plan to enlarge the Sierra del Mar Divisional Camp and Conference Center is inappropriate for this community and inconsistent with the rural residential neighborhood.

Community members voiced their concerns to the Ramona Community Planning Group (RCPG), citing that if approved, the project would have a negative impact on the quality of life and property values in the area. The RCPG unanimously agreed that the project is inappropriate for this area of Ramona and recommended that the San Diego County Department of Planning and Land Use deny the project.

We have many concerns regarding the proposed project, issues involving the environment, increase in traffic and noise, growth inducing factors, and potential devaluation of property values. The increased risk of wildfire is of tremendous concern - the single entrance/egress via Mussey Grade Road makes the location a natural trap if an evacuation of the compound (or neighborhood) is required.

We, the undersigned members of the Mussey Grade Road Alliance, join the Ramona Community Planning Group, Sierra Club, Save Our Forests And Ranchlands (SOFAR), and the Iron Mountain Conservancy in taking a formal stand to oppose the expansion of the Salvation Army's Sierra del Mar Divisional Camp and Conference Center.

Members of the Mussey Grade Road Alliance

Re: Opposition to the Proposed Master Plan for the Salvation Army Sierra del Mar Divisional Camp and Conference Center, Major Use Permit #P70-379W.

NAME	ADDRESS
Bridget + Walter Rose	16883 Brandi View Ln, Lakeside, 92040
Joseph Mitchell	19412 Kimball Valley Rd Ramona, 92065
Michael Hanus	14776 Mussey Grade Rd. Ramona 92065
Art T. Bale	14748 Mussey Grade Rd Ramona 92065
Kit Kesinger	P.O. Box 2911, Ramona, CA 92065
Tom Moore	15648 Mussey Grade 92065
Harvey Moore	15648 Mussey Grade 92065
John R. Morgan	20160 Kimball Valley Rd 92065
Doyle Hart	16922 Rio Mavia Rd, Lakeside, CA 92040
Carol Terzo	12917 Mussey Grade Rd Ramona Ca 92065
Edward Schneider	14062 Fern Brook Dr Ramona 92065
[illegible]	14246 Mussey Grade Rd. Ramona, 92065
[illegible]	14061 Mussey Grade Rd. Ramona 92065
Brian Riley	14136 Mussey Grade Rd, Ramona 92065
Jerry Taliaferro	13550 Mussey Grade Rd Ramona 92065
Bruce Meador	13364 Mussey Grade Rd " "
David Meador	13250 Mussey Grade Rd Ramona, CA
Mary & Leo McGuire	14414 Mussey Grade R Ramona, CA 92065
Mark Hutton	P.O. Box 1952 Ramona Ca
Kent Richardson	PO Box 404 Ramona CA
Cheryl Valundo	19529 Laurel Lane Ramona, Ca
Helen Wilson	P.O. Box 1952 Ramona, Ca
[illegible]	15425 Las Manzanitas Ramona CA. 92065
Richard Ryan	15839 Mussey Grade Ramona CA 92065
Julie Savary	14352 Mussey Grade Ram. CA 92065
Doug Schneider	14062 Fernbrook
Douglas E. Privatt	13835 Fernbrook Dr
Janet Privatt	13835 Fernbrook Dr.

Members of the Mussey Grade Road Alliance

Re: Opposition to the Proposed Master Plan for the Salvation Army Sierra del Mar Divisional Camp and Conference Center, Major Use Permit #P70-379W.

NAME	ADDRESS
Alexander Acker	19310 Laurel Lane 92065
Heather L. Acker	19310 Laurel Ln Ramona 92065
Ann Varnado	19590 Laurel Ln., Ramona 92065
Sharlyn Rocha	14170 Mussey Ramona 92065
Janine Immot	829 Pine St Ramona 92065
Diane Conklin	19412 Kimball Valley Rd Ramona CA 92065
Robyrne A Hanus	14776 Mussey Grade Ramona CA 92065

GARY L. PRYOR
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT

February 10, 2005

NOTICE IS HEREBY GIVEN that the County of San Diego is circulating for public review a draft Environmental Impact Report in accordance with the California Environmental Quality Act for the following project(s). These draft Environmental Impact Report(s) can be reviewed on the World Wide Web at **http://www.sdcdplu.org/dplu/ceqa_public_review.html**, at the Department of Planning and Land Use (DPLU), Project Processing Counter, 5201 Ruffin Road, Suite B, San Diego, California 92123 and at the public library(ies) listed below. Comments on these draft Environmental Impact Report(s) must be sent to the DPLU address listed above and should reference the project numbers and name.

P70-379W², LOG NO. 98-14-023; SCH NO. 2000031058; SALVATION ARMY DIVISIONAL CAMP AND RETREAT. The proposed project is a Major Use Permit Modification to the existing Salvation Army Camp located on 575 acres within the Ramona Community Plan Area. The current facility has functioned as a camp and retreat center for several decades under the original County Major Use Permit P70-379 and Modification P70-379W. The proposed phased expansion of the Salvation Army Divisional Camp and Retreat would include the following major components:

- Expanded Cabin Camping Component. The proposed project would increase the existing five masonry cabins to a total of 12 cabins, with toilets and showers in each cabin. This component would also include a building for arts and crafts and a separate restroom.
- Expanded and Relocated Tent Camping Component. The proposed project would expand and relocate six existing Yurts for a total of ten Yurts. An outdoor meeting area made of wood logs for seating is also planned.
- Nature Study/Educational Camp Component. This new component would include nine cabins, each with toilet and shower facilities; a building for classrooms and an outdoor amphitheater with concrete steps for seating.
- Expanded and Relocated Conference and Retreat Center. The proposed project would relocate the existing conferencing facility to the northern portion of the site and construct five, two-story buildings to accommodate guests; a building with a flexible meeting room, kitchen and breakout space; and two tennis courts, a swimming pool and a shower/toilet/spa building.
- Additional Staff Housing. The two existing housing buildings currently used to house staff members shall remain. The four cabins at the existing area located in the southeastern portion of the camp shall be converted to house approximately 17

staff members once the new retreat component is constructed. Four new buildings in the southeast portion of the camp shall house an additional 28 staff members, representing a maximum build out of approximately 20,000 square feet.

- Maintenance Facilities. The existing maintenance facilities would be demolished and relocated to the central-eastern portion of the project site. The new facility shall consist of a maintenance building of about 3,600 square feet with an approximate 1,200 square foot supply building.
- Expanded Support Facilities. The proposed project would also include: a 21,000 square foot central dining facility with a capacity of approximately 600 users to serve the Cabin Camp, Tent Camp, Nature Study/Educational Camp, a 19,500 square foot multi-purpose building with a capacity of approximately 600 users, a 2,500 square foot indoor mini-theater building with a capacity of approximately 125 users, a central administrative cluster of buildings with a combined maximum square footage of approximately 6,000 square feet to serve the entire camp, the administrative offices, a small infirmary, and a small convenience store "canteen" for employees and users of the camp, a standard septic system and leach fields throughout the site, parking to support the maximum population on-site approximately (188 designated spaces; 112 overflow spaces), and a 260,000-gallon bolted steel water tank, approximately 60 feet wide and 13 feet high.
- Recreation Facilities. The proposed project included new sports and play areas consisting of tennis courts, basketball courts, a large swimming pool, an approximately 2,500 square foot restroom and shower facility, a recreational rope course consisting of two 40-foot ladders connected by rope and a 300-foot zip line.

The project is located in the southwestern portion of the Ramona Community/Regional Planning Area within the unincorporated area of San Diego County. Specifically, the site is located at 14488 Mussey Grade Road. The draft Environmental Impact Report identified significant environmental impacts to Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Land Use and Planning, Noise, and Transportation/Traffic. Comments on this proposed draft Environmental Impact Report must be received no later than March 28, 2005 at 4:00 p.m. (a 45 day public review period). This draft Environmental Impact Report can also be reviewed at the Ramona Branch Library, located at 1406 Montecito Road, Ramona, CA 92065. For additional information, please contact Kristin Blackson at (858) 694-3012 or by e-mail at kristin.blackson@sdcounty.ca.gov.

ND02-22\9814023-NOTICE

RAMONA COMMUNITY PLANNING GROUP
15873 Hwy 67 – Ramona, CA 92065
Special Meeting Agenda for March 16, 2005
Ramona Community Center
434 Aqua Lane, Ramona, 6:30 PM – 8:30 PM

1. **Call to Order (Uriell, Chair)**
2. **Pledge of Allegiance**
3. **Determination of a Quorum (Mansolf)**
4. **List of Absentees for this Meeting**
5. **Announcements and Correspondence Received (Chair)**
6. **Non-Agenda Items (No Presentation on Ongoing Projects – These Must be Agendized) Presentation from Public on Land Issues not on Current Agenda**
7. **Comments for EIR. P70-379W2, Salvation Army Divisional Camp and Retreat, Expansion of Major Use Permit. Increase in Number of Cabins and Tents; addition of Nature Study/Educational Camp Component; Expanded and Relocated Conference and Retreat Center – addition of 5, 2-story Buildings, Kitchen, Flexible Meeting Room and Recreation Area; addition of 4 new Buildings for Staff; Replacement of Maintenance Facilities; Expanded Support Facilities. Increase to 750 People. Notice of Availability of Draft Environmental Impact Report. Public Review Period Ends 3-28-05. Received too late for Subcommittee Review. 14488 Mussey Grade Rd. (Action) Draft EIR is available at:** http://www.sdcdplu.org/dplu/ceqa_public_review.html
8. **General Plan 2020: Recommendations to the Planning Commission. Alternative Industrial Areas, GP 2020 Land Use Designations, and Special Study Areas (Town Center Design Project and Grasslands). (Action)**
9. **Adjournment**

The RCPG is advisory only to the County of San Diego. Community issues not related to planning and land use are not within the purview of this group. Item #6: Opportunity for members of the public to speak to the RCPG on any subject within the group's jurisdiction that does not appear as an item on this agenda. The RCPG cannot discuss these matters except to place them on a future agenda, refer them to a subcommittee, or to County staff. Speakers will be limited to 3 minutes. Please fill out a speaker request form located at the rear of the room and deposit on chairperson's table.

THE CHARITABLE EVENTS REGISTRY "The Art of Giving" AWARDS

RECOGNIZING THE DEDICATION AND GENEROSITY OF SOME OF SAN DIEGO'S FINEST IN PHILANTHROPY

While *San Diego Magazine* acknowledges the outstanding efforts of all charities, cultural institutions, social service groups and individual philanthropists featured throughout the *Registry*, it is the magazine's honor to pay due respect to those organizations and individuals whose outstanding work continues to benefit the San Diego community. Here, we recap our selections in four categories: Community Volunteer of the Year, Nonprofit Organization of the Year, Philanthropic Business of the Year and Philanthropist of the Year. May they inspire one and all in their efforts to give back to San Diego.

Frank Arrington, Community Volunteer of the Year

Goethe wrote: "We always have time enough if we will but use it aright." For more than 25 years, Frank Arrington has proved Goethe's statement by using his time to make San Diego a better place to live.

"I've always enjoyed doing things surrounding kids," Arrington says. That modest statement barely describes his activities to help the region's young people.

Arrington started his volunteering career as a Big Brother. He helped recruit other Big Brothers and raised funds for the organization, then became a member of the board and has served as its president. He has volunteered as a tutor in schools throughout the area, including Sherman Elementary and Hoover High, and he started a group called Tigers Forever at Wilson Middle School, taking students on field trips and expanding their horizons beyond the classroom. He also serves on the advisory board of Partnerships in Education, which forms collaborative arrangements between schools and organizations by providing mentors and tutors for San Diego kids.

But Arrington's dedication to the town goes even further. A member of San Diego Rotary, he was president of the downtown club for 2003-04. He is also vice-chair of the Sharp Healthcare Foundation, which is responsible for raising money to fund hospital programs and for disseminating grant monies to worthy projects involving issues in the healthcare field. He is on the advisory board of the San Diego Opera as well as the San Diego Organizing Project, an interfaith, multicultural organization that helps develop local neighborhood leaders.

Salvation Army, Nonprofit Organization of the Year

The red kettles and bell-ringing volunteers arrive with the first decorations of the holiday season, when the Salvation Army is at its most visible. But the organization, which has been part of San Diego since 1887, touches the lives of thousands of people every day of the year through its programs of education, support and its signature touch of compassion.

The Salvation Army's Door of Hope is a 6-acre campus that is home to four programs serving adolescent mothers, children, homeless families and seniors. The Haven Program provides sanctuary in the form of a long-term residential treatment group for pregnant and parenting teens and their babies. For homeless women and their children, the Transitional Living Center offers a safe environment, with classes to help manage their lives and counseling to assist them in finding new jobs. Children of residents and from nearby communities are educated and nurtured at the Children's Learning Center, while the central kitchen provides meals for the Door of Hope programs as well as for the Salvation Army's nine senior nutrition centers.

Perhaps the biggest impact the Salvation Army has had on San Diego is the Salvation Army Ray & Joan Kroc Corps Community Center, located in Rolando. The center has revitalized the neighborhood and provides opportunities for families to enjoy the Education Center with its Internet-based library, the theater and music programs and good old-fashioned fun in the aquatic facility, skateboard park and ice arena. With Joan Kroc's $1.5 billion bequest to the Salvation Army, the Kroc Center is serving as the flagship for other centers across the nation.

"Our other programs tend to be reactive," says Adrienne Finley, director of development. "By helping people reach their goals through excellence in athletics and the arts, the Kroc Center is a proactive, positive force."

Qualcomm, Philanthropic Business of the Year

"We believe we have a role to enhance the well-being of the communities in and around San Diego County," says Susan Laun, vice president of human resources at Qualcomm. "We take on that role with dedication, collaboration and enthusiasm."

Indeed, there is scarcely a neighborhood in San Diego that has not been touched by the company's philanthropy. Every year, Qualcomm donates 1 to 2 percent of the company's pretax profits to community causes, with a focus on programs that promote education, health and human services and culture and the arts.

From 1999 to 2004, Qualcomm provided more than $50 million toward education programs in San Diego County, focusing in part on bridging the "digital divide" by strengthening the relationship among San Diego's universities, the local kindergarten through 12th-grade system and the larger community.

Though the monetary contributions are generous, they are but a fraction of the company's philanthropic endeavors. Through its volunteerism program, Qualcomm Cares, the company encourages employee involvement in the community. From walkathons to holiday drives, Qualcomm Cares creates many opportunities for its employees, friends and families to participate in charitable events. Serving a wide range of needs, employees help people with disabilities, improve the environment, feed and clothe the homeless and care for animals. Qualcomm Cares organizes volunteer team-building projects as special opportunities for internal departments to foster teamwork and celebrate accomplishments, while contributing to the improvement of the San Diego community.

In addition, many Qualcomm employees contribute their management experience and talents though leadership positions at various nonprofit organizations. Through both board governance and committee involvement, Qualcomm's managers provide such services as strategic planning, public relations, marketing, information technology, accounting and financial management to a growing number of San Diego nonprofit organizations.

Joan Kroc, Philanthropist of the Year

Her good friend Maureen O'Connor, former mayor of San Diego, called her "St. Joan of the Arches." She was called the "Angel of Grand Forks" by people who had been touched by her generosity but didn't know her name. In 1997, Joan Kroc anonymously donated $15 million to flood-ravaged families in North Dakota and Minnesota. It was only when local reporters discovered the identity of the mysterious donor that her involvement became public knowledge.

Kroc passed away last year, but her legacy in San Diego and throughout the world lives on through her countless acts of charity and goodwill.

Born in St. Paul, Minnesota, Kroc married McDonald's founder Ray Kroc in 1969. She had no real knowledge of San Diego at the time; in 1974, when her husband announced he was buying the Padres, she thought he was purchasing a monastery. But her love for the city made itself known soon after the Krocs moved here. In 1976, she established her first philanthropic endeavor with Operation Cork, an alcohol education program in La Jolla.

Eight months after attending a nuclear disarmament conference in Washington, she spent $1 million on ads in more than 100 newspapers, calling for an end to nuclear testing by the United States and the Soviet Union. She also funded book printings and disarmament groups.

The next year, the Joan B. Kroc Institute for International Peace Studies opened at the University of Notre Dame with a $6 million contribution from Kroc. Later, she donated $25 million to the University of San Diego for the Joan B. Kroc Institute for Peace and Justice. She gave $3 million in 1987 to open the St. Vincent de Paul Joan Kroc Center for the homeless in San Diego.

Kroc's generous spirit was seen in her last bequests. Her $200 million gift to National Public Radio is believed to have been the largest monetary gift ever received by an American cultural institution. ■

Top to bottom: Frank Arrington; the Salvation Army's Colonel Diane O'Brien; Qualcomm employees displaying volunteer spirit; Joan Kroc.

U00442
P70-379

Septic System Feasibility Study for the Salvation Army Camp, Ramona

November 2, 2000

Vinje & Middleton Engineering, Inc.
2450 Vineyard Ave., #102
Escondido, CA 92029-1229
(760) 743-1214

Comment
Letter K

*****RAMONA COMMUNITY PLANNING GROUP*****
15873 HWY 67, RAMONA, CALIFORNIA 92065
Phone: (858)472-5516

March 26, 2005

Kristin Blackson
Joseph Farace
Department of Planning and Land Use
5201 Ruffin Rd., Ste. B
San Diego, CA 92123

RE: P70-379W2, SALVATION ARMY DIVISIONAL CAMP AND RETREAT
COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

The Ramona Community Planning Group (RCPG) reviewed the Salvation Army Draft Environmental Impact Report at a special meeting March 16, 2005. A motion was made to send comments, and the motion was unanimously passed by all RCPG members in attendance. The comments below were made by RCPG Members and members of the public. Written comments are attached.

Comments:

Fire Issues

- There are concerns that Mussey Grade Rd., a dead-end road, hard hit by the Cedar fire, would be "plugged up" by the Salvation Army Camp evacuating during a fire, once expanded. K1
- It was reported by one resident in the area that fire-fighting personnel had told him they had been instructed not to go south of Dos Picos Park Rd. during the Cedar Fire. K2
- In a fire it is unlikely that 500 children can be rescued as well as the people south of the project. K3
- It is doubtful anyone would have survived the Cedar fire had they stayed at the Camp. K4
- The scenario of a full camp evacuating, or sheltering in place during a fire should be addressed in the project EIR. K5

Transportation Issues

- The RCPG wanted an auxiliary lane of 1,000 feet added from Mussey Grade Rd. to Highland Valley Rd. K6
- The project has the potential to have traffic impacts around the clock. People will be coming and going, and then there will be services and deliveries. K7
- The roads fail now when school is in session. Traffic projections appear modest. K8
- The DEIR compares the project to the Oakbridge Younglife Camp. The K9

RESPONSE TO COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, DATED MARCH 26, 2005

Responses to Comments K1 through K5:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials. Please also see RDEIR responses to comments Letter D, H15 through H42, H59 through H71 and IF1 through IF50.

Response to Comment K6:
The comment does not state what road the auxiliary lane should be added to or substantiate the need for an auxiliary lane. Nonetheless, if the comment is referring to SR 67, the EIR does not identify the need to add a 1,000 foot auxiliary lane from Mussey Grade Road to Highland Valley Road.

Response to Comment K7:
The County does not concur that the project has the potential to result in traffic impacts around the clock. The potential traffic impacts associated with the proposed project have been evaluated in detail (see Final EIR Appendix E), and the results and conclusions of the analysis are presented in the Final EIR. As indicated on page 6-20 of the Final EIR, the campers stay for one week, and generally arrive on Monday afternoons (between 2:00 and 4:00 p.m.) and depart on Saturday morning (between 9:00 and 10:00 a.m.). Camp staff generally arrives on Monday mornings and departs on Saturday afternoons, with one-half remaining for the duration of the season. The Retreat groups generally arrive on Friday evenings (after 6:00 p.m.) and leave on Sundays around midday. Also, there will be an average of ten miscellaneous/delivery trips on any given weekday, of which one round-trip is assumed during both the AM and PM peak-hours. Given the operation characteristics of the camp, there is no reason to expect the camp to generate any traffic at night.

Response to Comment K8:
The comment does not provide any evidence that the roads fail now when school is in session nor explain what "fail" means. The traffic analysis prepared for the proposed project takes into account the traffic generated by existing development, including schools, in the area. Traffic counts were conducted in June 2004 and November 30 – December 1, 2004. The calculation of project traffic assumed a worst case scenario of full buildout with a maximum number of potential users (748 users and 10 miscellaneous deliveries/trips per weekday). The traffic analysis also analyzed the cumulative traffic impacts, which includes the potential traffic generated by approximately 85 discretionary projects (see EIR Figure 3-1) that have an application for approval pending or have been approved, but have not yet been built.

RESPONSE TO COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, DATED MARCH 26, 2005 (CONTINUED)

Responses to Comments K8: (cont'd.)
A comprehensive update of the traffic study was conducted in 2009. The previous DEIR traffic analysis did not identify any direct traffic impacts associated with the proposed project. The comprehensive update confirmed these previous conclusions.

Response to Comment K9:
Please see DEIR response to comment JT13.

K9 (cont'd.)

Oakbridge facility uses 65 percent cars.

- In the event of a car or truck crash, the road could become blocked. K10
- It is doubtful that the area could support additional traffic in an emergency. K11
- Other Salvation Army camps are located in more accessible areas. Mussey Grade Rd. is not the right place for this type of a proposal. K12
- The peak of traffic is broad, starting at approximately 3 p.m. and lasting until 7 p.m. The actual peak is 6 p.m. K13

Noise and Light Pollution Issues

- Noise is emitted from the camp now. Will an increase of three to four times the amount of people equal that much more in additional noise emissions? K14
- We would like assurances that there will be no sound amplification, including during special events. K15
- Light and noise pollution are a concern. The Mussey Grade Rd. area is quiet, and dark at night. K16

Community Character Issues

- The project is inconsistent with the surroundings due to the project size, scope, intensity, and potential impacts. K17
- The project, as proposed, is a commercial venture in a rural, residential area. K18
- The project should be looked at in the context of Mussey Grade Rd. on a larger scale. K19

Biological and Archaeological Issues

- The Wildlife Research Institute information in the DEIR has not been updated since 2000. K20
- The DEIR archaeological and biological surveys should be redone since the Cedar fire swept the area after these surveys were completed. The survey should include the poison oak patch as well as any other areas that weren't surveyed before. K21
- The DEIR doesn't consider the extensive foot traffic of the increased impact of use of 750 people in the outside areas of the main camp, nor does it address the trails that will be created by the foot traffic. K22

General

- The DEIR states that there are unmitigable impacts to the preferred Alternative. K23

RESPONSE TO COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, DATED MARCH 26, 2005 (CONTINUED)

Response to Comment K10 and K11:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials and RDEIR responses to comment Letter D.

Response to Comment K12:
Comment noted.

Response to Comment K13:
The AM and PM peak hours (e.g., 4:00 to 7:00 p.m.) assumed in the traffic study are consistent with County and Caltrans accepted analysis peak hour methodology.

Response to Comment K14:
Final EIR Section 2.4, Noise, provides a detailed analysis of potential noise impacts of the proposed project. The Final EIR concludes that the project's noise impacts are reduced to a level below significance with the implementation of MUP Conditions and mitigation measures.

Response to Comment K15:
Use of sound amplification outdoors will be prohibited under the MUP.

Response to Comment K16:
The Final EIR concluded that the project would not cause a significant impact due to lighting. As indicated on EIR page 2.5-11, the project will be required to comply with the MUP conditions related to lighting for the project, County Light Pollution Code (County Code Section 51.201 et seq), and Section 6322 of the County Zoning Ordinance. All outdoor lighting will be approved types and will be adjusted to reflect light downward and away from roads, driveways, and adjoining property. The proposed project is consistent with the Ramona Community Plan guideline directing that lighting be used efficiently to aid safety, security and to compliment architectural character without intrusion into adjacent properties, roadways and the night sky.

Response to Comment K17:
Please see DEIR responses to comments JCC2, JCC11, and JCC20.

Response to Comment K18:
Please see RDEIR response to comment H43.

RESPONSE TO COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, DATED MARCH 26, 2005 (CONTINUED)

Response to Comment K19:
Please see DEIR responses to comments JCC2, JCC11, and JCC20.

Response to Comment K20:
The County assumes the comment is referring to the Wildlife Research Institute's information regarding golden eagles. The Wildlife Research Institute's information on golden eagles has not been updated since 2000 because there are no significant changes in eagle status which would require an update. The County is not aware of any new pairs of eagles within the Iron Mountain area. Please see RDEIR response to comment IB22 and IB23.

Response to Comment K21:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comments Letter H11, IB1 and IB2.

Please see DEIR response to comment L4 regarding the need to conduct additional cultural resources surveys.

Response to Comment K22:
Areas that are designated for active use, including trails, have been included in the evaluation of impacts associated with the proposed project. Final EIR Figure 1-4 depicts the proposed site plan and areas of the camp that are assumed to be impacted. Most of the project site not proposed for active camp activities is inaccessible (steep topography and heavy vegetation), and intrusion into these areas by campers will be discouraged through the use of signage and fencing. The continued use of existing trails is proposed. Final EIR Figure 1-14 depicts the proposed trail signage and foot stake locations.

Response to Comment K23:
Comment noted.

Salvation Army Camp DEIR -3- March 26, 2005

Favorable Comments:

- The addition of an adult retreat is a plus for the Community.
- It is good that the recreational vehicle component has been eliminated.
- With vans and buses on site, evacuation will be possible.
- The camp teaches character building concepts. Expansion will allow more children to be reached.
- The Salvation Army does good work.
- The archaeological survey should not have to be redone.
- Comments regarding concerns for fire issues, community character and traffic impacts are sensationalism. The DEIR contains facts.

K24

Please note that the Ramona Municipal Water District, at a Board meeting on March 22, 2005, recommended that a secondary access be required in the event of evacuation. K25

Sincerely,

Kristi Mansolf, Secretary
for PATRICK URIELL, Chair
Ramona Community Planning Group

Attachments

RESPONSE TO COMMENT LETTER FROM RAMONA COMMUNITY PLANNING GROUP, DATED MARCH 26, 2005 (CONTINUED)

Response to Comment K24:
Comments noted.

Response to Comment K25:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials and RDEIR responses to comment Letter D.

Comment Letter L

Janet Gilbert 20061 Sunset Oaks Drive Ramona California 92065 760.789.7305

March 15, 2005

Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: P70-379W2, LOG NO. 98-14-023; SCH NO. 2000031058: Salvation Army Divisional Camp and Retreat, Comments on the Draft EIR

Dear County Planner:

I would ask that the DEIR be rejected as outdated. Notably, the biological and cultural surveys were done in 1999, 2000 and 2001. The biological surveys were all conducted during an ongoing drought. In 2003, the site burned in the Cedar Fire. Numerous chaparral plant species are dependent and responsive to fire. Some plants' seeds may remain dormant for decades in the soil waiting for the intense heat of a fire to promote germination. In the aftermath of a fire, soils are enriched, and with this year's significant rainfall, it is highly probable that species undetected during the drought years are now present. For example, the report notes that there are approximately 100 acres of habitat suitable for Quino Checkerspot Butterflies with a probability of moderate to moderately high. This habitat should be reassessed. L1

The project proposes to restrict construction within 300 feet of a raptor's nest during breeding season. This is inadequate. The raptor study, submitted with the DEIR, states that allowing this project to go forward has a high probability of significant adverse impacts to Golden Eagles both directly in habitat encroachment and indirectly in loss of foraging habitat. L2

By the DEIR's own analysis, the recommended project is in conflict with BMO and RPO and proposes significant and unmitigated impacts to biological resources. This is unacceptable and is evidence of a failure on the part of the Salvation Army to work in good faith with the community and the county. L3

Similarly, with regards to the Cultural Resources, only accessible open areas were surveyed. In the aftermath of the Cedar Fire, a more thorough assessment is possible and should be required. L4

Again, I ask that you reject the DEIR and require updated studies to accurately assess the resources on site and the impacts such a project would have. L5

Thank you.

Sincerely,

Janet Gilbert

Janet Gilbert

RESPONSE TO COMMENT LETTER FROM JANET GILBERT (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 15, 2005

Responses to Comments L1 through L3:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comment H11, IB1, IB2, IB22, and IB23. Please see DEIR response to comment L4 below regarding the date of the cultural surveys.

Response to Comment L4:
The County does not concur with this comment. The cultural resources investigations conducted for the proposed project site included an intensive pedestrian survey in accordance with the County's cultural resource guidelines. The methodology and results of these surveys have been reviewed and verified by County. As noted, in the 1999 ASM survey, "Ground visibility within the valley bottom was generally good, ranging from 10% to 60% of surface area. Visibility along the valley margins was more variable due to vegetation, but acceptable in most locations. Within portions of the northeast 1/4 of the camp dense stands of sage scrub precluded the use of linear transects, necessitating a more opportunistic approach to surveying. It is thought, however, that these areas have very low site potential due to their generally rugged topography." (ASM, 1999, page 4). The 1999 report further states, "Through out the survey considerable care was used to insure that all of the area of highest site potential was thoroughly examined. These areas included the lower riparian zones, the valley margins, and the valley floor."

The subsequent 2001 survey included two areas: 1) the proposed location of the water tank including a 200-foot wide buffer area; and, 2) a previously existing overnight campground, a short access road to it, and two additional proposed campground areas to be linked together by hiking trails.

The 2001 ASM report states, "The area of the proposed water tank included previously cleared areas with ground surface visibility of 90% but which were disturbed by bulldozing. The 200-ft.-wide buffer at the water tank site is occupied by very dense, tall chaparral underlain by thick leaf litter. Ground surface visibility in the buffer was 0-5%." While the report identifies 0-5% visibility in the 200-foot wide buffer area surrounding the water tank, further archaeological survey of this buffer area is not warranted for the following reasons: 1) the project does not propose any development or disturbance within the 200-foot wide buffer zone; 2) the ground surface visibility was 90% in the area that will be disturbed by construction of the water tank; and 3) the survey methodology was conducted in accordance with County cultural resource guidelines.

RESPONSE TO COMMENT LETTER FROM JANET GILBERT (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 15, 2005 (CONTINUED)

Responses to Comments L4: (cont'd.)
The 2001 ASM report further states, "Ground surface visibility at the proposed campgrounds and hiking trail was moderately better ... Ground visibility ranges from 0-30% and tends to be highest along ridge crests and knoll tops in the immediate proximity of the proposed campgrounds and hiking trails."

Aside from the accuracy and validity of the original cultural surveys, the comment states that because there is an increase in survey accessibility due to the Cedar Fire, a "more thorough assessment is possible and should be required." Again, the County does not concur with this comment. The areas that the comment is referring to will not be impacted by the project as explained in the Final EIR, Chapter 2.6. As stated above, the areas that are proposed to be impacted were surveyed in accordance with the County cultural resource guidelines and were areas that were easily accessible with adequate visibility prior to the fire. There is no evidence that updated surveys are necessary or would change the conclusions of the current analysis regarding potential impacts.

Furthermore, County Code section 87.429 states, "if, in the process of grading operations, human remains or Native American artifacts are encountered, grading operations shall be suspended in that area and the operator shall immediately inform the County Official, and the requirements of the Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.99 shall be complied with." This requirement would apply to the project.

Response to Comment L5:
Comment noted.

Comment
Letter M

salva
March 16, 2005

TO: RCPG Chair
RCPG Secretary
FROM: Vivian Osborn, member

Agenda Item 7: Comments P70-379W2, Salvation Army Draft EIR

The current project has not changed since it was presented to previous RCPG meetings.. The RCPG has discussed, reviewed and made two decisions to deny the project due to unmitigable impacts to the community. These decisions were based on review of the project on July 1, 1999. The proponent presented the project and stated in the minutes of the meeting "We understand the personal issues, but would like to take exception to the desire to have an EIR. The county does not seem to think it is necessary." M1
As we see this evening there is a very large EIR that is here for review and comment by the public and the EIR.

This RCPG has had less than 5 days to review a FULL EIR. M2

The project as presented has continued through the process Again in October 4, 2001 a motion to Deny the project was passed because the project was less than 10% different from the original 1999 project. M3

There is no new information. There is a full EIR to be reviewed for comments. If we have comments lets hear them in brief and dispatch the comments to the DPLU. M4

1. The DEIR is incomplete and inadequate. A complete new study of the Biological resources must be done to accommodate new information that has been overlooked prior to the Cedar fire and of the extensive rainfall that has occurred this past season. M5

2. The DEIR is incomplete and inadequate. A complete new study of the Archeological resources that the Cedar fire and the extensive rainfall have uncovered must be done. The entire area must be surveyed as it was not surveyed in the current DEIR. The DEIR is incomplete and inadequate as it addresses only the footprint of the very large project buildings and does not consider the extensive foot traffic of the increased impact of use of 750 people in the outside areas of the main camp. It does not address the trails that will be created by the foot traffic and archeological surveys have not been done on the entire project site. M6

Comment: The DEIR states that there are 'unmitigable impacts' to the proponents preferred Alternative.
I suggest that the RCPG not support the preferred alternative. M7

RESPONSE TO COMMENT LETTER FROM VIVIAN OSBORN (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 16, 2005

Response to Comment M1:
Comment noted.

Response to Comment M2:
Please see DEIR response to comment JI2.

Response to Comment M3:
Comment noted.

Response to Comment M4:
Comment noted.

Response to Comment M5:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. Please see RDEIR responses to comments H11, IB1, and IB2.

Response to Comment M6:
Please see DEIR responses to comments L4 and K22. The increase in the number of users of people at the camp would not adversely affect potential cultural resources. Most of the project site will be protected by an open space easement, and signs will be placed every 200 feet along the open space boundary which prohibit entry into the open space easement (Final EIR, page 1-10). Although the project would include trails, youth campers would be occompanied by camp staff, and the steep topography would discourage hikers from leaving the trail.

Response to Comment M7:
Comment noted.

3. Page 4-3 of the DEIR: 4.2.2 Comparison of the Effects of the No Project Alternative to the Proposed Project.
3. The No Project Alternative allows an increase in use of the facilities and "significant and unmitigable Biological Resources and Land Use/Planning impacts WOULD NOT occur with implementation of the No Project Alternative. However, development of the allowed dining hall/kitchen and youth activities building could still result in impact to environmental resources. Such impacts are assumed to be substantially reduced when compared to build of the proposed project. M8

I suggest that the RCPG comment that the No Project Alternative is the preferred Alternative of the community and that the RCPG represents the neighborhood of Mussey Grade and it's desire to reduce impacts to the Historical area and Mussey Grade Road. By supporting the No Alternative Project the RCPG supports the goal of Ramona as a Rural Community and its desire to preserve and protect Ramona's rural character. M9

RESPONSE TO COMMENT LETTER FROM VIVIAN OSBORN (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 16, 2005 (CONTINUED)

Response to Comment M8:
The purpose of this comment is unclear. The point of the comment appears to be that under the No Project Alternative, development of facilities allowed by the existing County Major Use Permit (MUP) P70-379 and modification P70-379W would result in "impacts to environmental resources." The No Project Alternative correctly assumes that the prior approved facilities (a dining hall and kitchen and a youth activities building) could be constructed (see Final EIR page 4-3). It is true that the impacts of the No Project Alternative are less than the impacts associated with the proposed project.

Response to Comment M9:
Comment noted.

Comment Letter N

Comments on Draft Environmental Impact Report for the

Proposed Salvation Army Divisional Camp and Retreat

SCH NO 2000031058, ER98-14-023, P70-379W2

Archaeological surveys were conducted February 1999. The survey identified five prehistoric archaeological sites. In 2000, subsurface testing directed towards significance evaluation was completed at four out of the five sites. Three of the sites had very minimal subsurface deposits and were not considered significant by any of the criteria set forth by the California Register of Historic Places. The fourth site *was* considered significant and eligible to the California Register and will be preserved by preservation via a legally dedicated open space easement. N1

Another survey was performed in February 2001, in the proposed location of a 250,000 gallon water tank, a short access road leading to the tank and 200' buffer area around each. In addition, two proposed camping areas and the hiking trail linking the two, with a 200' buffer area were surveyed as well.

Since the last survey was conducted the Cedar Fire destroyed a major portion of the camp. Brush in the area was extremely dense pre-fire and the likelihood that new sites are now visible is extremely high.

The loss of vegetation and ground cover not only increases the potential for unrecorded sites being visible and accessible, but it opens the site up to unauthorized use or vandalism. Instances of unauthorized collecting of artifacts have already occurred in many areas of the county since the fire. I would request that the entire camp be resurveyed for archaeological resources. N2

In addition, the impacts 748 individuals will have on cultural resources needs to be addressed. Open space easements are great in theory, but in *reality*, if these areas are not fenced or signage put in place and enforced, they will be adversely affected by the sheer volume of visitors this camp is likely to have. Perhaps conducting a training session with camp and supervisory staff to provide education on site preservation and how to prevent damage to resources would be appropriate. N3

RESPONSE TO COMMENT LETTER FROM GEORGE MANSOLF (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), NOT DATED

Response to Comment N1:
Comment noted.

Response to Comment N2:
Please see DEIR responses to comments L4 and M6.

Response to Comment N3:
The cultural resources assumed to be impacted by the proposed project are located within the proposed development areas (including campgrounds) and 200 feet from the proposed development areas and trails. A majority of the artifacts recovered during archaeological evaluations of the project site were recovered from subsurface testing. Digging by campers would not be allowed. Of the four archaeological sites potentially impacted by the proposed project, only one significant site (CA-SDI-15114) would in the open space easement. The preservation of this site in an open space easement complies with existing regulations, and access into the open space easement would be prohibited.

Comment
Letter O

March 16, 2005

To Whom-It May Concern,

I have lived in Ramona for twenty-eight years and have been a property owner for seventeen years. I was owner and operator of Grace Christian School, Ramona for ten years. I have been surrogate parent for Ramona Public Schools for many years.

I have had several foster children. God gave me the privilege of adopting six boys.

As a single mom I fully appreciated the Salvation Army Camp, being right here in Ramona.

My children enjoyed the Camp over the years. Besides the fun, they were given love and care. They were taught many character building concepts. Many times the Camp Counselor kept contact with the boys throughout the year. 01

It is my hope that the Planning Board will give the Salvation Army what they need to keep helping children in such a positive way. Please help them to expand so even more young people may be encouraged to do right, and to grow up as productive adults.

Thank God

Charlotte J. Hambly M.D.
847 B St, Ramona
789-8695

P.S. For the good the Camp did for my boys I would be willing to continue to drive 5 & 10 miles per hour down 67 like I do most every morning of the week.

RESPONSE TO COMMENT LETTER FROM CHARLOTTE J. HAMBLY (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 16, 2005

Response to Comment O1:
Comment noted.

Comment
Letter P

March 21, 2005

Kristin Blackson
Joe Farace
Department of Planning and Land Use
5201 Ruffin Rd., Ste. B
San Diego, CA 92123

RE: Draft EIR for the Salvation Army Project, P70-379W2

The Salvation Army Camp Major Use Permit (MUP) expansion, as proposed, and the majority of the alternatives, have the potential to bring in hundreds of people, greatly impacting the Mussey Grade Rd. area. P1

During the Cedar fire, main circulation arteries were closed to Ramona. With two lanes and only one way in and out, Mussey Grade Rd. has displayed its vulnerability to the impacts of fire on more than one occasion. Any changes proposed for this area must be responsibly considered for potential impacts. When considering large projects on Mussey Grade Rd., one must take into account the entire number of people that need to evacuate from Mussey Grade Rd., and the time it will take to move them. This information should be contained in the DEIR. P2

Shelter in place appears to have been removed from the Salvation Army project Draft Environmental Impact Report (DEIR). Evacuation remains the only option. If sheltering in place is still an option, this scenario should be addressed in the DEIR. P3

The RMWD voted on March 22 to require a secondary access. As a concerned individual, who lives in the vicinity of the proposed Salvation Army project, and with an interest in evacuation planning, I request that you also require a secondary access to the Mussey Grade area for the Salvation Army project, in the interest of public safety. Secondary access should be addressed in the DEIR for traffic, archaeological and biological impacts. P4

The proposed expansion of the Salvation Army project is inconsistent with the quiet, peaceful, and rural area of Mussey Grade Rd. The project DEIR does not adequately address the change in the density and intensity of use proposed in the area, and the offsite impacts to the neighbors. Traffic and biological impacts are also not adequately addressed.

Although the Salvation Army does good work in the community, transportation, community character, biological and archaeological impacts must still be identified and adequately addressed. P5

Kristi Mansolf Kristi Mansolf
15873 Hwy 67
Ramona, CA 92065

RESPONSE TO COMMENT LETTER FROM KRISTI MANSOLF (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 21, 2005

Response to Comment P1 through P4:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials and RDEIR responses to comment Letter D.

Response to Comment P5:
The County disagrees with the comment. Impacts related to community character, traffic, biology, and archaeology are addressed in the Final EIR Chapters 2.2 (Biological Resources), 2.4 (Noise), 2.5 (Aesthetics), 2.6 (Cultural) and 2.7 (Land Use/Planning), and section 6.2.2 (Traffic) and section 3.1.10 (Cumulative Impacts).

Comment Letter Q

Blackson, Kristin

From: Dorroh, Carolyn [CAROLYN.DORROH@cubic.com]
Sent: Thursday, March 17, 2005 7:46 AM
To: Dorroh, Carolyn; Blackson, Kristin
Subject: Comments: Draft EIR for the proposed Salvation Army Facility, SCH NO 2000031058, ER98-14-023, P70-379W2, dated February 2005

Hi Kristin,

Please accept the contents of this email as my comments on the Salvation Army Facility's Draft EIR. These comments reflect the reality that this proposed Salvation Army project is so large that it can not be mitigated and that this Draft EIR is inadequate. Q1

The RCPG meeting on March 16, 2005, was my first exposure to the Salvation Army. I must say that my impression of them did not match my anticipated impression. It was the deception aspect that surprised me. I believe that partial truths are untruths.

1. In speaking of this project, they would make it a point to stress "the children" when speaking of an aspect of that use. Yet, when speaking about the majority of the other aspects, numbers were simply used and move on quickly to another topic. They did not elaborate on public use that is the majority of the annual users. This theme left the impression that this facility is all about the children without the commercial aspect. Q2

2. It was stressed several times that the Salvation Army is a good neighbor and will always be a good neighbor. A good neighbor wouldn't dream of inflicting the negative impacts onto the surroundings as that of this proposed commercial endeavor. Unfortunately, when words and actions don't match, distrust occurs. I now have a better understanding of the Mussey Grade Road residents' concerns. Q3

3. They continually stressed the use of busses and vans by their user and would not entertain the idea of individual's using vehicles. Mr. William Jenkins, Vice President of the Ramona Chamber of Commerce, told me during the meeting that the Chamber uses this facility as a retreat and that no one carpools to the facility nor do they intend to carpool. They were never asked or required to do so either. The Salvation Army refuses to adequately address traffic impacts. Q4

Thanks,
Carolyn A. Dorroh, Ramona Community Planning Group Member
17235 Voorhes Lane, Ramona, CA 92065
Home: 760-789-4429 Work: 858-505-2244
Email: carolyn.dorroh@cubic.com

TO:
Kristin Blackson, Phone: 858-694-3012, Email: kristin.blackson@sdcounty.ca.gov

COMMENTS ON:
Draft EIR for the proposed Salvation Army Divisional Camp and Retreat; SCH NO 2000031058, ER98-14-023, P70-379W2, dated February 2005

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005

Response to Comment Q1:
The County does not concur that the Draft EIR is inadequate. The EIR discloses that as proposed, the project would result in a significant unavoidable impact related to conflicts with the MSCP and the General Plan Conservation Element. However, a reasonable range of alternatives are also evaluated in the EIR, including the Reduced Project Alternative I, which would avoid the significant, unavoidable impacts associated with the Applicant's Preferred Alternative. The Reduced Project Alternative I will be presented to the decision makers.

Response to Comment Q2:
Please see RDEIR response to comment H43.

Response to Comment Q3:
The comment does raise an environmental issue pursuant to CEQA; therefore, a response is not required.

Response to Comment Q4:
The EIR adequately addresses potential traffic impacts. The assumptions about bussing, vanpool, and carpool made in the trip generation methodology (section 4.1 of the TIA, Appendix E of the Final EIR) are based on the best available data -- the Salvation Army's experience with the existing camp/retreat. In addition, data was obtained from the similar Oakbridge Camp a few miles from the project site. The Oakbridge Camp's trip generation characteristics support the VOR assumptions in the Salvation Army Divisional Camp and Retreat TIA (Table 4-1 and section 4.1 of Appendix E of the Final EIR). It would be inaccurate to assume no-carpooling given the fact that significant vanpooling already exists, and given the project's relatively remote location.

The use permit for the existing camp/retreat does not include a condition or requirement for carpooling at the Salvation Army Divisional Camp and Retreat. If the County approves the project, the MUP will include a condition that requires the Retreat Center rental contract to recommends the use of bus, van, or carpool as transportation to the site. In addition, the MUP would also include a condition requiring the applicant to assign an employee to maintain a daily vehicle log book to record the number of trips to and from the camp and retreat, all arrival/departure times and the type of vehicle (car, van, bus, etc.). The log book will be available upon request to DPLU.

Pursuant to Zoning Ordinance Section 7362.e, the Department of Planning and Land Use may, if necessary, conduct periodic inspections of the property for which a use

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q4: (cont'd.)
permit is granted to ensure that the permitee is complying with the use permit conditions. The County acknowledges its responsibility to enforce the MUP conditions. Moreover, if the public believes that Salvation Army is not complying with one or more MUP conditions, the public may contact the Department of Planning and Land Use (DPLU). DPLU would refer the matter to the Code Enforcement section for investigation and enforcement.

This Salvation Army project is massive with impacts that can not be mitigated. Its alternatives are different, yet still massive in nature. The EIR needs to offer an alternative that satisfies the concerns that drove the Ramona Community Planning Group (RCPG) to deny this project on two previous occasions in the process leading up to this point. Their expressed concerns were with: Q5

a) fire hazards,
b) traffic hazards,
c) negative environmental impacts, and
d) a commercial use that is out of harmony with the rural residential neighborhood that it occupies.

Furthermore, the density is out of sync with the 2020 Plan as voted on by the RCPG. This area is 20 acre DU minimum along the road and 40 acre DU back from the road. Q6

There is a need to look at impacts with diligence and not take a dismissive attitude towards them. None of the issues that caused the RCPG to deny it 2 times before have changed. Priorities should be aligned to the community's best interest and our goals should be:

1. to protect the public's health, safety and welfare.
2. to protect the rural character, its ambiance, and quality of life that is the essence of Ramona. Q7

3. to protect the irreplaceable cultural resources and historical aspects in this extraordinary area of our community.

4. to protect the naturally occurring resources which sustain many of the threatened and endangered species of San Diego County.

Goal 1:

public's health, safety and welfare

1. The EIR needs to address various emergency scenarios of building a project of this magnitude with significantly limited ingress/egress onto a two lane dead end road called Mussey Grade Road. The project's single access road goes through the dense oak woodland. There is no secondary access off of Mussey Grade Road in case of an emergency. No secondary access road means that hundreds of residents living south of the facility may not be able to timely evacuate in the case of a major wildfire as has been experienced by the Cedar Fire. If necessary, look at historical data from the Cedar Fire to determine anticipated effects common to the area of Mussey Grade road. There's a need to address possible scenarios occurring that could render the project's entrance too hazardous to use. Situations to be examined should include, but not be limited to a wildfire during: Q8

a. average conditions,
b. drought conditions,
c. Santa Anna conditions.

2. The Draft EIR simply looks at good days for evaluating traffic. It must evaluate the area's historical extreme conditions as well. Q9

a. During the rainy season, we see a steady stream of water flow over Mussey Grade Road in several areas.

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q5:
The County does not concur with this comment. The EIR presents a "reasonable range of project alternatives". Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Further, section 15126(d)(5) states that "the range of alternatives in an EIR is governed by the 'rule of reason' and only requires the EIR to set forth those alternatives necessary to permit a reasoned choice."

The alternatives discussed in the EIR constitute a reasonable range of alternatives. Reduced Project Alternative I would: relocate the retreat center to avoid significant biological impacts; decrease the size of the retreat center by one 16-unit cabin; eliminate the retreat center gatehouse, the tent component, a restroom/shower building, outdoor seating and an outdoor presentation area. Reduced Project Alternative I would reduce the capacity of the camp by 133 users and decrease the total project building footprint by 11,150 square feet. Compared to Reduced Project Alternative I, Reduced Project Alternative II would eliminate one cabin from the retreat center component and would eliminate three cabins from the education camp component for a reduction of 11,346 square feet of buildings and 102 persons who would attend the camp. The substantial reduction in the building square footage and the number of persons provides a reasoned choice for the decision makers. Please refer to Table 4-1 for a comparison of the impacts of the project alternatives.

The impacts related to fire hazards, traffic hazards, and community character have either been identified as less than significant or can be mitigated to a level less than significant with the implementation of proposed mitigation measures. The alternatives analysis provided in the EIR focuses on the analysis of alternatives capable of reducing or avoiding the significant and unmitigable land use/planning and biological resources impacts of the proposed project.

The alternatives analyzed in the Final EIR constitute a reasonable range of alternatives as required by CEQA as explained above. An EIR is not required to analyze all alternatives suggested in public comments.

Response to Comment Q6:
This comment compares the residential density for the surrounding area as proposed in the General Plan Update with the maximum capacity of the Salvation Army Divisional

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q6: (cont'd.)
Camp and Retreat. This comparison is not valid because the Salvation Army project is not a residential use. The project is a Civic Use Type that is allowed with a Major Use Permit at this site. Therefore, the residential density referenced in the comment does not apply to the project. While the capacity of the camp will be expanded, the rural character will be retained. For example, 68 percent of the project site will remain as open space (Final EIR Table 2.7-1 Land Use Summary). Additionally, with the implementation of mitigation measures identified in the EIR, the project will not result in impacts related to aesthetics, noise, or lighting.

Response to Comment Q7:
The impacts related to fire hazards (comment issue 1), traffic hazards (comment issue 1), community character (comment issue 2), aesthetics (comment issue 2), noise (comment issue 2), cultural resources (comment issue 3) and biology (comment issue 4) have been analyzed in the Final EIR. Each of these issues was identified as less than significant or can be mitigated to a level less than significant with the implementation of proposed mitigation measures.

Response to Comment Q8:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials and RDEIR responses to comment Letter D.

Response to Comment Q9:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials and RDEIR responses to comment Letter D and DEIR response to comment JT8.

b. A Mussey Grade fire north of the Salvation Army site would render this single ingress/egress impassable to all residents and visitors south of the fire. There is insufficient helicopter support to evacuate this portion of Ramona's population.

c. The EIR must address impacts of the proposed project during worst case scenarios. When an accident shut down Hwy 78 last week, traffic lines were unbelievable throughout Ramona. I took me 35 minutes to drive 2 miles on Highland Valley Road!

Q9 (cont'd.)

3. EVACUATION PLAN: The EIR needs to address the inadequacies of the standard brush clearing and the proposed water tank to provide protection in the case of a wildfire during a Santa Anna condition. Under the conditions of the Cedar Fire, the Salvation Army lost some of its buildings which, at the time, had adequate brush clearing. A water tank and vegetation clearing would still make evacuation mandatory in the case of a wildfire. When this facility is used by children they are dropped off by buss, which then leaves the facility. Children are then left there for days. Having 2 full size busses on premises at all times does not adequately address 748 maximum capacities for evacuations. The capacity of a buss is decreased by as much as 1/3 as the size of a person increases by early teens. Small children can be seated 3 to a seat while adults can be seated 2 to a seat. In the case of a wildfire, the EIR needs to address how much time would it take to get adequate transportation into the facility for evacuation. School busses are high profile, large, slow moving vehicles that would slow traffic in the event of an emergency evacuation of Mussey Grade road. In the case of an emergency, encouraging people, especially adults, to leave their valuable vehicle behind to carpool on a buss, is not a realistic plan. This traffic impact surge for a short period of time adds an unacceptable danger to hundreds of residents south of the Salvation Army on Mussey Grade. The EIR also needs to address what course of action would be taken should any escape road along the way be impassable as seen when the Cedar fire jumped Hwy 67.

Q10

4. Mussey Grade Road is a substandard road.
a. In sections, it fails to meet the County's Interim Standards of 28 feet wide.
b. Physical and environmental constraints prohibit road widening.
c. In some areas, the shoulder beside the road is only 1 foot wide leaving no room for error and an inability to pull off the road for emergency reasons.

e. The indicated bike lane on Mussey Grade road does not have the mandated 10 foot width.
f. What is the maximum gross vehicle weight design of Mussey Grade Road? How do all anticipated heavy vehicles compare to this? Food delivery trucks are sometimes done by 18 wheel trucks. Why has the DEIR failed to address food delivery trucks?

g. What is the maximum clearance under the oak canopy of Mussey Grade Road? What is the maximum vehicle height of all forecasted heavy vehicles?

GOAL 2:

rural character, its ambiance, and quality of life

The Mussey Grade residential neighborhood of large parcels is a high risk area due to its terrain, vegetation, and limited access. It is an inappropriate neighborhood for this type of commercial venture. Coming in the name of the Salvation Army does not make the area more appropriate for:

Q11

- Five two story buildings providing room rentals,

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q10:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials and RDEIR responses to comment Letter D and DEIR response to comment JT.

Trucks currently deliver food and supplies to the existing camp/retreat at this site. The TIA (Final EIR Appendix E) includes 10 miscellaneous delivery trips for the proposed project expansion.

Response to Comment Q11:
Please see DEIR response to comment JA5, JT2 and RDEIR response to comment H43.

- facilities for 198 students,
- a dining facility that can feed 600 people at a time, and
- a Conference Center large enough for gatherings for 600 paying customers.

Q11 (cont'd.)

As seen in the traffic study, 748 customers have the ability to generate an enormous amount of traffic. Mussey Grade Road is insufficient for the proposed project.

Goal 3:

cultural resources and historical aspects

1. Historic Mussey Grade Road follows the route of the 19th century stage coach and has a long history of being a **small scale travel corridor**. This is one of several eligible properties that justified placing it on the California Register of Historic Resources. Future developments of any kind on Mussey Grade Road threaten to eradicate this historical distinctive feature which, amazingly, is still in existence today. The preservation of this **small scale travel corridor** needs to be addressed in the EIR. As one of Ramona's elected officials, I will say that mitigation for this **scale** alteration is unacceptable to this community. Making it part of "Grand Central Station" with this expansion of the Salvation Army facility is not in line with the existing character and historic value of the area. How can the impacts of this proposed project be mitigated? Q12

2. Preserving the winding two-lane Mussey Grade Road and its 200-year-old oak canopy is more important to this community than widening it to accommodate this or any other project. The population in Mussey Grade should not be increased to the point that justification would exist to have its remarkable features improved, altered, or destroyed to accommodate safety features that would be necessary. Q13

3. The EIR needs to address the importance of Mussey Grade on the larger scale than Mussey Grade alone. The County of San Diego, recognized the unique historical, cultural and biological value of this historic road area and purchased, within the last 5 years, 2,200 acres of land for preservation and conservation. Some of this County land is contiguous with this Salvation Army land. The proposed heavy density commercial uses of the Salvation Army are inconsistent with the purchase of the neighboring county land. Q14

4. Vegetation has been significantly reduced by the Cedar fire now exposing areas that were not visible or accessible to archeologists before. As seen in our public parks throughout the burn area, cultural resources are now exposed and vulnerable to looting and further damage. The archeology study needs to be redone and include the entire parcel for the EIR. Campers heading to the country will not be in the frame of mind to be contained within the development area and trails. Climbers love steep slopes and large rocks. Campers tend to venture out into the countryside looking for adventure and whatever they can find out there. Q15

5. European diseases greatly reduced the native population, later settlements into the area further disrupted the way of life of the native inhabitants, and today we declare the few remaining artifacts insignificant to justify destroying them with development. The EIR needs to address the cultural impacts of the long term trends and estimate what will remain a few hundred years from now. Q16

Goal 4:

natural resources, threatened and endangered species

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q12:
Please see DEIR response to comment JCC2.

Response to Comment Q13:
Please see DEIR response to comment JCC2.

Response to Comment Q14:
Please see DEIR response to comment JCC2.

Response to Comment Q15:
Please see DEIR responses to comments L4 and M6.

Response to Comment Q16:
The cultural resources assessment was conducted in accordance with standard cultural resource survey and assessment protocol, County requirements, and CEQA. These methodologies do not require the cultural resource assessments to include and extrapolation of long-term trends and what types of cultural resources will remain in the future.

1. The biological study in the Draft EIR is not an accurate reflection of today's post Cedar fire results. We know that a variety of tree species, including oaks, have been lost due to the fire. Vegetation that would not have normally grown before now has favorable conditions to grow in this environment. History tells us that Indians of this area used fire as land management to promote the growth of grass and flowering annuals, which in turn increased game populations to the area. Because wildfires rejuvenate certain species, the biology study needs to be redone for the EIR. Q17

2. The sewer has not been addressed at all in the DEIR. This exclusion is unconscionable! The EIR needs to address how the installation of 12 acres of leach lines, estimated to be about 18 miles of leach lines, and its usage will not adversely impact groundwater resources and the environment. Q18

3. The oaks are such an important aspect to the Mussey Grade area. Some have been lost to the Cedar fire; none should be lost to development as well. The project needs to figure out a design that would not impact or diminish the oaks in any way. Trenching through their roots and removing their branches to balance out the destruction, makes them less likely to survive a catastrophic event or drought years. Q19

4. No hunting, no shooting of any kind and no trapping needs to be enforced on the property and appropriate signage indicating that stance needs to be posted as well. Q20

5. The EIR needs to address how the recovering areas due to the Cedar fire will not be negatively impacted, by development and the renters of this site, therefore increasing their vulnerability. Q21

6. Light pollution needs to be addressed in the EIR. Also, the EIR needs to address the differing insect attraction impact due to the installation of new lighting in the area. This change will affect the insect congregating numbers and insect varieties that would normally occur on site. The human response to an increase insect infestation is not usually an environmentally desirable one. The use of chemicals results in cancer and tumors on wildlife feeding off of impacted bugs. Q22

7. People, dogs, and cats negatively impact small game and large animals. Plans have been made to address the dogs and cats, but failed to adequately decreasing the human impacts to something that would not be significant. Q23

8. The cumulative biological study area should also include the neighboring Ramona Grasslands area. Q24

GENERAL COMMENTS

1. (Volume II, section 2.2, page 5) The conclusion that traffic "occurs almost exclusively during off-peak days and hours of the week" is not consistent with the following activities:

a. The facility is a rental for most of the year. How can traffic be predicted for this type use? One of the user groups told me that they do not carpool to the Salvation Army facility, nor do they intend to do so in the future. The lives of these business people are too hectic to try to plan such an endeavor for such a short trip within Ramona's community planning area. Q25

b. In the off-season, half the group drives into Ramona and arrives during peak rush hours from 4:00 to 6:00 pm on a Friday.

c. Vans and busses dropping campers off between 2:00 and 4:00 pm on Mondays will be leaving the facility during peak hours by the time unloading occurs. Also,

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q17:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comment H11, IB1 and IB2.

Response to Comment Q18:
The septic system has been sized to accommodate a maximum of 748 persons. The County Department of Environmental Health (DEH) has reviewed the septic system engineering for the project. The proposed septic system engineering includes the safety factors required for this use. The septic system would require a permit from DEH and would have to comply with applicable water quality regulations of the RWQCB. In a letter dated April 10, 2003, DEH stated it has "no objection to approval of the Major Use Permit modification" and has attached conditions for project approval. Furthermore, the letter states that DEH "has reviewed onsite wastewater system designs for a reduced version of the project. The reduced version has no impact on previously designed and approved onsite wastewater systems." The letter also states the basis for the recommendation was percolation testing, groundwater separation studies, soil character assessment and a nitrate discussion provided by Vinje and Middleton Engineering, Inc. (January 2003). In 2009, the DEH approved the septic plan (see letter dated December 21, 2009) and stated that DEH has "no objection to approval of the Major Use Permit Modification." The updated Vinje and Middleton Engineering, Inc. report (December 18, 2009) is provided as Appendix K to the Final EIR.

Response to Comment Q19:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comment IB19, IB 20, IB21, IB31, IB33 and IB43.

Response to Comment Q20:
Currently, no hunting, shooting, or trapping is allowed at the Salvation Army site. This restriction will be continued if the proposed project is approved.

Response to Comment Q21:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q21: (cont'd.)
comments H11. Furthermare, the proposed project will protect 395 acres of the project site in an open space easement. Any burn areas that wauld be located within the open space easement would be protection by the easement including fencing and signs. Any burn areas in the areas to be disturbed by the proposed project are considered impacted, and mitigation measures have been proposed for these impacts.

Response to Comment Q22:
Project lighting is addressed in EIR Chapter 2.5. While lighting fixtures do attract insects, they are not known to increase the propagation of any insect species, nor are they anticipated to attract insects to a level requiring the use of pesticides at the camp. Moreover, it is important to note that a camp/retreat with lighting fixtures has been at this site for several decades without any record of insect infestations.

Response to Comment Q23:
Currently, no hunting, shooting, or trapping is allowed at the Salvation Army site. This restriction will be continued if the proposed project is appraved. The camp will not provide facilities for, or allow, cats. Dogs are allowed, but must be on a leash. As a condition of project appraval, leash law restrictions must be posted on-site and enforced. Resident staff will be prohibited, through written camp policy, from keeping cats. (see Final EIR page 1-11).

Response to Comment Q24:
The cumulative biological study are does include the neighboring Ramona Grasslands area as requested by the comment (Final EIR, section 3.1.2).

Response to Comment Q25:

a. Please see DEIR response to comment Q4.

b. The traffic analysis in the EIR is consistent with this comment (Final EIR, Appendix E, Table 4-1).

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q25: (cont'd.)

c. The TIA assumes the vans and busses would depart between the hours of 2:00 to 4:00 pm (see Final EIR Appendix E, Section 1.2.1). Consistent with County and Caltrans accepted methodology, the TIA assumes AM and PM peak hours between 4:00 to 7:00 p.m. However, traffic counts taken on August 25, 2009 indicated actual PM peak hour at the intersection of SR-67/Mussey Grade Road to be between 5:00 to 6:00 pm (see Final EIR Appendix E). Therefore, vans and busses departing from the site, during the most conservative scenario (taking approximately 30 to 50 minutes to unload) would not impact peak hour trips.

d. The traffic analysis and VOR assumptions include the trips associated with support vehicles, such as mail delivery, trash pick up, food delivery, etc. There will be an average of ten miscellaneous/delivery trips on any given weekday, of which one round-trip is assumed during both the AM and PM peak-hours (see Final EIR Appendix E).

If the County approves the project, the MUP would include a condition requiring the applicant to assign an employee to maintain a daily vehicle log book to record the number of trips to and from the camp and retreat, all arrival/departure times and the type of vehicle (car, van, bus, etc.). The log book will be available upon request to DPLU. The purpose of this condition is to compare the actual project operations with the specific counts outlined in the Traffic Impact Assessment, which are based on the VOR assumptions. Signs will be installed in the camp parking lots to inform camp users to register their vehicles at the camp office. Pursuant to Zoning Ordinance Section 7362.e, the Department of Planning and Land Use may, if necessary, conduct periodic inspections of the property for which a use permit is granted to ensure that the permitee is complying with the use permit conditions. The County acknowledges its responsibility to enforce the MUP conditions. Moreover, if the public believes that Salvation Army is not complying with one or more MUP conditions, the public may contact the Department of Planning and Land Use (DPLU). DPLU would refer the matter to the Code Enforcement section for investigation and enforcement.

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q25: (cont'd.)

e. The traffic analysis assesses potential traffic impacts from the project during the peak-hour consistent with County traffic impact methodologies. As described on page 19 of the traffic report (see Final EIR, Appendix E), "The State (Caltrans)-controlled two-lane highway segments were assessed by calculating decrease in speed and increase in "percent-time following" due to the addition of project and cumulative project traffic on the highway segment during the peak hours in the peak directions, based on Chapter 20 of the 2000 Highway Capacity Manual (HCM). "Percent Time Following" represents the freedom to maneuver and the comfort and convenience to travel. It is the average percentage of travel time that vehicles must travel in platoons behind slower vehicle due to the inability to pass." Specific inputs include, among others, "heavy vehicle Passenger Car Equivalence" which weights larger vehicles, such as trucks, with more trips (in this case a truck is assigned 2.0 trips). Therefore, the conditions described by the comment have been addressed in the traffic impact analysis.

according to "Traffic Data Service Southwest Vehicle Counts", peak Mussey Grade traffic generally occurs in this time frame.

d. Support vehicles such as mail delivery, trash pick up, food delivery, fuel trucks, etc. do typically operate during peak days of the week. There is no enforcement mechanism to control traffic occurring outside suggested hours given in the Draft EIR.

e. The Draft EIR fails to address Ramona's peak hours. Ramona is unique in respect to its location on Hwy 67 and Hwy 78. On weekends the there is a steady stream of tourist traffic traversing between tourist attractions (Julian, Santa Ysabel) the desert and their homes. The traffic is filled with huge recreational vehicles, smaller motor homes, trucks or trailers with off road vehicles stacked in them, dune buggies, trucks with horse trailers, passenger vehicles, motorcycle clubs, antiques cars from varying clubs, etc. This Draft EIR has inadequately addressed the traffic aspect. Q25 (cont'd.)

2. We're told that some campers will arrive by buss which will drop campers off then the vehicle leaves the site. Volume II, Section 10.3, page 27 states "campers are dropped off at the site and their vehicles do not park." The EIR needs to address how an emergency evacuation could effectively occur with this lack of mobility available on site. The EIR also needs to address the displayed inability for the fire department to service the Mussey Grade area during the Cedar fire and how this known inability will affect the proposed impacts of the Salvation Army. Q26

3. The people "amount" column of Volume II, Table 2, page 10 does not add up to the maximum 748 guest capacity. Q27

4. Building Design in the EIR needs to address lessons learned from the Cedar Fire. Firemen saw homes burn down due to hot embers drawn into attic vents or under roof tiles. In many cases, wood exposed under eaves was highly vulnerable to burning as well. Burning debris was thrown an enormous distance in advance of the fire itself. The developer needs to address these vulnerabilities in site and structure design. Q28

5. Volume II, "Project Traffic Distribution/Assignment" is grossly outdated. An example is that Velocity Paintball (MUP P99008) area should be referred to as The Groves (GPA 04-009, REZ 04-018, TN 5390) a project that proposes 6000 to 7000 ADTs. Q29

6. A degradation in our already LOS F roads is a significant impact to the residents of Ramona. Just because this proposed project would not lower the lowest available LOS does not mean that there is no impact on the Quality of Life. The human, emotional, and well being aspects must be adequately addressed in the EIR. Q30

7. (Volume II, "Significance of Impacts/Mitigation Measures", Item 5) Drivers supporting customers of the Salvation Army project are not as familiar with our roads as a Ramona resident would be. Simply looking at historical accident rate at the intersection of Mussey Grade and Hwy 67 is not an accurate forecasting method for this project's future impacts. This proposed project offers a continual turnover of 748 strangers on a weekly basis. It fails to look at the all important "familiarity" aspect of the driver. Visitors take the unanticipated curves too quickly only to discover no shoulder on the side of the road. At night, Mussey Grade Road is an unlit roadway and in the oak canopy areas, moon light does not shine on the road. Also, the Accident Data on California State Highway used was published in 1998. Q31

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q26:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials and RDEIR responses to comment Letter D, H15 through H42, H59 through H71 and IF1 through IF50.

Response to Comment Q27:
The 748 guest capacity includes 523 campers, 175 retreat center guests, and 50 staff. As footnoted in Table 2 of the TIA, total staff is 50, about half of which arrive/depart weekly; therefore, only 25 staff members are included in the weekday project traffic generation.

Response to Comment Q28:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials.

Response to Comment Q29:
A comprehensive update of the traffic study was conducted in 2009 because data in the DEIR traffic study was collected in 2004. Cumulative project traffic volumes were updated based on information obtained from recently completed traffic studies for projects that are located in the general vicinity of the project site. The project referred to in the comment (The Groves) was withdrawn in October 2007; therefore, it would not be included in the cumulative project traffic list.

Response to Comment Q30:
Please see DEIR response to comment JT2. CEQA does not require an EIR to address social impacts. See CEQA Guidelines Section 15064(e) and 15131.

Response to Comment Q31:
Please see DEIR response to comment JT5, JT7 and JT8. The EIR evaluates the traffic impacts associated with the proposed project, including the roadway network contemplated in the Ramona Community Plan. The construction of the southern bypass would not impact the traffic analysis for the proposed project.

Ramona traffic has radically increased since then. The EIR needs to address today's statistical accident rate. The EIR also needs to address the impacts of a south bypass going through. This south bypass would be near Mussey Grade Road heading to Dye Road intersecting with San Vicente Road. A large portion of Ramona's population, which lives in the San Diego Country Estates, would use this bypass. Q31 (cont'd.)

8. Volume II, Passenger Car Equivalent (PCE) Volumes did not address busses, food service delivery trucks, and fuel delivery trucks in its single heavy vehicle impact calculations. Q32

9. Volume II, 4.0 Potential Pollutants, Table 4 fails to list anti-freeze as a potential pollutant. It would not be uncommon for busses and vans traveling up the grade, during our hot summers, to have an overheating radiator overflow coolant fluids. The Salvation Army Facility internal road parallels a creek for quite a distance. The EIR needs to address potential impacts to the quality of water flowing in this highly susceptible area. Q33

10. Volume II, 4.0 Potential Pollutants, Table 4 fails to address uncommon pollutants that would normally be found in the contents of the routine trash truck which would drive on the internal road that parallels a creek. Although it is prohibited, people dispose of hazardous materials in their trash. The EIR can not neglect potential impacts to the quality of water flowing in this highly susceptible area. Q34

11. (Volume II, 5.0 Proposed Best Management Practices)

a) Volume II, 5.2.A Site Design Best Management Practices states that dedicating an area as open space easement guarantees that the area will remain undeveloped and natural. Based on historical data, we see that an open space easement offers no protection. A proponent may violate, vacate, or encroach on the easement with a simple request and the presence of a few supporters. Planning Groups and the Board of Supervisors are habitually and routinely vacating open space easements.

b) (Volume II, 5.0 Proposed Best Management Practices) The facility has an infirmary, yet the EIR fails to address the handling and disposal of biohazard materials. The safeguard of drugs and any other controlled substance should also be addressed in the EIR as well. Q35

c) (Volume II, 5.0 Proposed Best Management Practices) The EIR fails to address how household recyclables, such as aluminum cans, glass and plastic bottles, will be accommodated to decrease the impact on our landfills.

d) Environmental changes due to the addition to vegetated swales/detention basins need to be addressed. Will this encourage mosquito infestation in the area? Will animals take the risk of running through traffic to get to these watering holes? Will it support vegetation that would not normally grow in the area?

e) Controlled fire was not addressed in the Draft EIR nor the BMP. All areas that I have seen where fires are allowed, neighboring trees and brush are stripped to fuel the fire. Dried oak leave are commonly used as kindling. Removing dried leaves off the ground, dead branches, and lower branches will allow vegetation growth under the oaks that would not normally occur.

f) Unauthorized fire was not addressed in the BMP. I've witnessed campers making a camp fire in an unapproved area of a park in San Diego County. When the ranger arrived on the scene to put a stop to it, two male campers ganged up on him with yelling, verbal abuse, and intimidation. This particular ranger stood his ground as his trembling body wrote the ticket.

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q32:
Please see DEIR response to comment Q25.d.

Response to Comment Q33:
The County's Storm Water Standards Manual does not identify antifreeze as a significant potential pollutant of concern from automobiles. Rather, heavy metals are identified as the primary pollutant of concern. The storm water pollution plan (see Final EIR Appendix G) addresses the potential impacts from the internal circulation road (heavy metals, trash and debris, and oil and grease). Furthermore, the potential for vehicles to overheat, spill antifreeze, which would then get carried into the creek is also considered very low and not significant. Any cases of overheating would likely occur during the summer months, a dry period where the fluid would not be washed into the creek by rain.

Response to Comment Q34:
All hazardous waste generated at the campground will be disposed of in accordance with applicable regulations governing their use and disposal. Furthermore, waste disposal trucks transporting trash from the camp will operate under all applicable regulations governing waste disposal and transport. Waste disposal trucks load and compact waste at the collection location. The waste is transported in a covered, contained vehicle. Therefore, there would no significant impacts from collection of transport of waste even if it included hazardous materials.

Response to Comment Q35:

a. The project will require the dedication of an open space easement over a large portion of the property. Uses referenced by the comment would not be allowed in the dedicated open space easement. The open space easement places restrictions on the types of uses or activities, if any, that can occur in the easement. Should any camp activities occur in the open space easement that are not allowed, the camp would be in violation of the MUP and would be subject to enforcement actions by the County. Furthermore, any proposed encroachment into the easement or vocation of the easement would be subject to further CEQA review and associated discretionary permit process by the County.

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q35: (cont'd.)

b. The County does not concur that all potential uses have not been adequately evaluated in the EIR and associated SWMP. The infirmary would involve application of first aid to camp visitors with relatively minor ailments (e.g., headaches, cuts and scrapes, sunburn, insect bites) and would not generate hazardous medical wastes. Therefore, the infirmary would not cause significant impact to water quality.

c. Solid waste is addressed in the Final EIR, page 6-3. As stated, "If maximum trash capacity were reached every week of the year, the expanded camp would contribute 2,080 cubic yards of trash to the Ramona Landfill annually." Waste will be disposed of at the Ramona landfill, which is projected to provide capacity to the Ramona area for another 15 to 20 years. Recycling of aluminum, glass, and plastic will also be encouraged (e.g., provision of separate containers for recyclable materials).

d. The proposed BMPs include measures to ensure that free-standing water does not occur for long periods of time, thereby avoiding the issues raised by the comment. As stated in the Storm Water Management Plan (see Final EIR, Appendix G, page 13), "Detention basins will be designed to treat the volume of runoff produced from a 24-hour 85th percentile storm event by detaining the water for a minimum of 24 hours and a maximum of 72 hours. This detention time allows enough time for sediments and particulate matters to settle out of the water, but should not create a vector control problem since the basin will be emptied." Also, as part of the proposed SWMP, (see Final EIR, Appendix G, page 21), "Inspections of vegetated swales will also occur once a month by the maintenance staff. Inspections will also occur after large storm events and on a weekly basis during periods of wet weather. If standing water is observed, it will be removed to prevent any mosquito breeding or aquatic plant growth."

e. The existing camp does not allow campfires. This would continue under the proposed project.

f. The existing camp does not allow campfires. This would continue under the proposed project. Also, smoking will not be permitted in any portion of the camp.

g. Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated: See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comment Letter IB32. The San Vicente Creek and its tributaries will be included in the open space easement (See Final EIR Figure 1-2).

These gentlemen consider themselves fine upstanding citizens. How does an "at risk" youth behave in comparison to this? We know that a minimum wage employee does not offer the authority, expertise, and dedication as that of a park ranger. Children playing with fire in a semi-arid climate are a dangerous thing and needs to be adequately addressed in the EIR, especially the likelihood of unregulated or unsupervised smoking by both children and adults. We witness adults flicking burning cigarettes out of cars all the time. Q35 (cont'd.)

g) The BMP failed to address how it will prevent the high turnover rate of 748 new facility users from deteriorating the stability of the banks of the San Vicente Creek and tributaries.

12. (Volume I, Noise Analysis) Worst case scenarios have not been adequately addressed.

a) The existing environment setting speaks of noise contributions from overhead aircraft and Marine air traffic as well. Test dates were done in March and noise prediction models did not address aircraft noise impacts. The EIR needs to include noise measurements during fire fighter air attack takers activity as is common during the fire season, not March. The EIR also needs to include noise measurement during peak use time during Marines helicopter activity. Operations scheduled can be obtained from Miramar Operations Officer.

b) The EIR does not address the potential noise impacts of a future International Airport located at Miramar. We know that Miramar is on the Base Realignment and Closure (BRAC) Commission's list. We also know that the San Diego County Regional Airport Authority's list of potential future International Airport sites lists Miramar as well. This flight pattern would be over this area and would include large commercial aircraft all day and well into the night. The feasibility of speaking in large outdoor areas to hundreds of people without sound amplification equipment needs to be addressed as well. Q36

c) Will the Salvation Army activities include a morning bugle revelry of some kind, meal time bell, or outdoor group singing activities?

13. The Salvation Army needs to incorporate and practice human activities that would make humans less appealing to Mountain Lion attack. Q37

14. (Draft EIR Section 2.1 - Geology/Soils) This section simply addresses recommended mitigation measures for facility construction. Yet, it does not adequately address the impacts that would be caused by the land use of the campers. The facility is not only used by children, but is also rented out as a commercial business. Unlike a resident, there will always be people who are new to the area and filled with curiosity, mischief, unfamiliarity, and adventure. Potential erosion problems brought on by hiking, bike riding, rock collecting, plant collecting, dogs digging, digging for cultural artifacts, destructive acts, etc. need to be addressed. Q38

15. (Draft EIR Biological Resources) Long term human impacts, not simply the construction of facilities, to this area of importance to the neighboring golden eagles are significant. San Diego County has experienced an incredible decline in numbers of golden eagles. March 1 to July 1 is the peak tourist season offering comfortable weather to folks who care to venture into this area. Having campers present during the breading season for the California gnatcatcher year after year is a significant impact. The same human impacts need to be addressed for the nesting raptors as well. Q39

16. How does the applicant intend to protect open space easements from campers who are unfamiliar Q40

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q36:
The noise associated with fire fighting aircraft and Marine Corps aircraft operations is sporadic and short term. Therefore, it is not anticipated to be significant and was not included in the environmental baseline for ambient noise levels. Furthermore, the inclusion of these sporadic noise levels would raise the baseline ambient noise measurements at the camp, which would make any noise generated by the project seem less significant in comparison. The establishment of a commercial airport at Marine Corps Air Station Miramar in the future is speculative. Finally, the project includes the following restrictions for outdoor and indoor noise amplification, "The use of sound amplifying equipment as defined by the County Code §36.402 at any outdoor location is prohibited. All indoor activities involving the use of sound amplifying equipment shall comply with the noise limits defined in the County Noise Code §36.404." Should any camp activities occur that are not allowed, the camp would be in violation of the MUP and would be subject to enforcement actions by the County.

Response to Comment Q37:
Mountain lion attacks are very rare and would not be expected at this location due to the group environment. Furthermore, the comment does not raise a significant environmental issue for which a response is required.

Response to Comment Q38:
The activities mentioned by the comment would not be expected to have a significant impact on the erosion of soils. These activities would not result in the removal of large amounts of vegetation that would expose soils to erosional forces (wind, water). Trails and other activity areas will be maintained as necessary, and destruction of camp property, including mischief and destructive acts, would be prohibited by the camp operators. Please also see RDEIR response to comment IB38.

Response to Comment Q39:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comment IB22 and IB23.

with the sensitive habitat, those who are destructive in nature, and ignore signs? "At risk" youth are not famous for their adherence to rules. In Ramona, I've seen a burning cigarette flicked into grassland areas on two occasions. Both resulted in open flames. People use creeks and tributaries as toilets because they offer privacy with dense vegetation. Rock outcropping seem to be the frequent recipient to broken beer bottles. The collecting of acorns by humans rather than allowing nature to take its toll of feeding wildlife or propagating has not been addressed. Q40 (cont'd.)

17. Why has the DEIR not addressed the impact of "at risk" youths, the potential to house homeless folks, or juvenile delinquents that a Major Use Permit would allow with this expansion? Because the capacity stays with the property, the impacts from the potential people types that could be housed on the property need to be addressed. I suggest looking at people types that are normally helped by 501c3 organizations, community service groups, commercial ventures, group care facilities and correctional institutions. Q41

18. The EIR needs to address how the significant impact on this nesting pair of golden eagles can be mitigated. Q42

CONCLUSION

As it stands today, the Salvation Army proposed project would be the largest facility, not only in the immediate facility of Ramona, but within the entire North Inland County area, including Poway, Lakeside and Rancho Bernardo. There is no other facility, of this capacity that I am aware of, other than the Barona Gambling Casino and Resort which could in one place accommodate 748 overnight guests.. In other words, this proposed project is similar to a gambling casino hotel with regards to the impacts, to the neighborhood, and our rural town of Ramona. There seems to be no need to plant such a project in such a place and therefore I recommend that the project be rejected by the Planning Commission and the Board of Supervisors based on the foregoing comments. Q43

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 17, 2005 (CONTINUED)

Response to Comment Q40:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comments RDEIR IB16, IB32, IB38, H24, and DEIR Q41 that address:

- Open space easement protection,
- Open space fencing and signage,
- Supervision of youth,
- No smoking, and
- Activities not expected like peeing in public, liter, and collection of sensitive resources.

Response to Comment Q41:
This comment does not raise a significant environmental issue for which a response is required. It is important to note an existing camp/retreat has operated at this site for several decades. The MUP does not restrict the type of youth population that would be served by the project. However, all youth camp programs will include the appropriate level of supervision by adults and counselors.

Response to Comment Q42:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.2 Biological Resources and RDEIR responses to comment IB22 and IB23.

Response to Comment Q43:
The County does not agree that the proposed project will have impacts on a level similar to a casino. This comment does not specifically address the adequacy of the EIR, as such, no further response is necessary. Please see DEIR response to comment JCC2 and RDEIR response to comment H43.

Russell, Glenn S

From: Heather Thomson [iplay3rd@earthlink.net]
Sent: Monday, March 14, 2005 1:24 PM
To: Russell, Glenn S
Subject: Salvation Army

Glenn,

I was asked to sit on the Ramona AHOPE committee. I honestly do not have the time. However, I did agree to look over the various EIR's when they come through. **R1**
To get to the point, regarding the Draft Environmental Impact Report for the Salvation Army Divisional Camp and Retreat project proposal (SCH No. 2000031058; ER98-14-023; P70-379W2):
I was wondering if you were considering requiring a resurvey of the project area. It has been close to five years since it was surveyed. In that time the Cedar Fire destroyed a major portion of the camp. The brush in the area was extremely dense pre-fire and the likelihood that new sites are now visible is high. The DEIR states that in much the survey area visibility was 0-5% and 0-30%. I also did not see a survey coverage map for the 1999-2000 survey and was wondering if the whole property was surveyed or just the proposed development areas.

I have observed some amazing features and artifacts at Wildwood, the adjacent property, all of which are unrecorded. Attached is a photo of just a few of the artifacts that were in the "*collection*" of the previous resident at Wildwood. The guy had been "excavating" in one site for who knows how long. He had, (the key word here is **had**) an amazing collection of artifacts. Shells: olivella, argopectin, chione, donax and others. Ground stone. shark teeth, soapstone pendants, beads. Every type of projectile point you can think of, ceramics, bone awls, arrowshaft straighteners and what I found the most curious, was a human incisor, scoop shovel with a biconically drilled hole through the top of it. As if it had been strung..... **R2**
I had convinced him to STOP DIGGING and was working on getting him to donate his collection to the Arch Center (I know, no exact provenience but the assemblage from a 50x50m area was amazing). Unfortunately, the Cedar Fire wrecked havoc and destroyed the collection. Literally turned lithics to dust...
It would be interesting to see if these sites extend the length of that little valley. Let me know what you think.

Sincerely,

Heather Thomson

3/15/2005

RESPONSE TO COMMENT LETTER FROM HEATHER THOMPSON (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 14, 2005

Response to Comment R1:
The County does not agree that updated surveys should be required. Please see DEIR response to comment L4.

Response to Comment R2:
The County is not required to survey adjacent properties because the project does not propose development on any adjacent property and, therefore, would not impact cultural sites on adjacent property. Please also see DEIR response to comment L4.

RESPONSE TO COMMENT LETTER FROM HEATHER THOMPSON (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 14, 2005 (CONTINUED)

Attachment

- Special Meeting Agenda for Ramona Community Planning Group for March 16, 2005. Item #7: Comments on DEIR.

RAMONA COMMUNITY PLANNING GROUP
15873 Hwy 67 – Ramona, CA 92065
Special Meeting Agenda for March 16, 2005
Ramona Community Center
434 Aqua Lane, Ramona, 6:30 PM – 8:30 PM

1. Call to Order (Uriell, Chair)
2. Pledge of Allegiance
3. Determination of a Quorum (Mansolf)
4. List of Absentees for this Meeting
5. Announcements and Correspondence Received (Chair)
6. Non-Agenda Items (No Presentation on Ongoing Projects – These Must be Agendized) Presentation from Public on Land Issues not on Current Agenda
7. Comments on Environmental Impact Report (EIR). P70-379W2, Salvation Army Divisional Camp and Retreat, Expansion of Major Use Permit. Increase in Number of Cabins and Tents; addition of Nature Study/Educational Camp Component; Expanded and Relocated Conference and Retreat Center – addition of 5, 2-story Buildings, Kitchen, Flexible Meeting Room and Recreation Area; addition of 4 new Buildings for Staff; Replacement of Maintenance Facilities; Expanded Support Facilities. Increase to 750 People. Notice of Availability of Draft Environmental Impact Report. Public Review Period Ends 3-28-05. Received too late for Subcommittee Review. 14488 Mussey Grade Rd. Draft EIR is available at: http://www.sdcdplu.org/dplu/ceqa_public_review.html
Comments on EIR. (Action)
8. General Plan 2020: Recommendations to the Planning Commission. Alternative Industrial Areas, GP 2020 Land Use Designations, and Special Study Areas (Town Center Design Project and Grasslands). (Action)
9. Adjournment

The RCPG is advisory only to the County of San Diego. Community issues not related to planning and land use are not within the purview of this group. Item #6: Opportunity for members of the public to speak to the RCPG on any subject within the group's jurisdiction that does not appear as an item on this agenda. The RCPG cannot discuss these matters except to place them on a future agenda, refer them to a subcommittee, or to County staff. Speakers will be limited to 3 minutes. Please fill out a speaker request form located at the rear of the room and deposit on chairperson's table.

Comment Letter S

Blackson, Kristin

From: Dorroh, Carolyn [CAROLYN.DORROH@cubic.com]
Sent: Wednesday, March 23, 2005 6:44 AM
To: Blackson, Kristin
Cc: Dorroh, Carolyn
Subject: Comments: Draft EIR for the proposed Salvation Army Facility, SCH NO 2000031058, ER98-14-023, P70-379W2, dated February 2005

To: Kristin Blackson, Land Use/Environmental Planner
County of San Diego, Department of Planning and Land Use
5201 Ruffin Road, Suite B, San Diego, CA 92123
(858) 694-3012, Kristin.Blackson@sdcounty.ca.gov

From: Carolyn A. Dorroh
17235 Voorhes Lane, Ramona, CA 92065
(760) 789-4429, carolyn.dorroh@cubic.com

Comments: Draft EIR for the proposed Salvation Army Facility, SCH NO 2000031058, ER98-14-023, P70-379W2, dated February 2005

At the last Ramona Community Planning Group Meeting, the Salvation Army explained that their plan entailed them rounding up people onto a ball field and that sprinklers would be used to lower the temperature in the event of a fire. I believe that risk associated with a "no evacuation" solution makes multiple accesses to this Salvation Army Facility a necessity. There should be a second road out to Hwy 67 to adequately evacuate the Salvation Army facility without threatening the safety and well being of residents in the Mussey Grade Road area. **S1**

As published on the Ramona Sentinel's front page of the October 11, 2001 issue, Steve Butler, a fire chief with 32 years of firefighting experience, publicly boasted that this Salvation Army Facility was a safe place to wait out a fire. He assured us that evacuation was not a necessary thing. Justification for his expert assessment was based on the brush clearing and the water tank that had the capacity to fill the equivalent of 500 fire trucks. Butler said that the 100-foot clear zones around the buildings would allow a fire to blow through without spreading from vegetation to structures, leaving no need for an evacuation. He also said "I hope those of you on Mussey Grade create a fire safe perimeter around your house, so you won't have to evacuate and clog up the road."

The fact that the Salvation Army evacuated their facility during the Cedar Fire tells me that they had no faith in the fireman's expert opinion nor did they, or any of their campers, have the courage to "sit in place". I stand here in disbelief that such a method would be proposed as the solution. In the future, there is no guarantee that they will choose or have the ability to convince others to "sit in place" instead of evacuate the area. **S2**

When the Cedar Fire burnt Salvation Army buildings along with the proposed "shelter in place" ball field, it demonstrated to this community that Mr. Butler's expert assessment was dead wrong. Under Santa Anna conditions, we saw burning debris thrown ahead of the fire by great distances. Today, there is no doubt in our minds how wildfire can behave. **S3**

Unfortunately, the Cedar Fire has also demonstrated to this community, the inability for firemen to

RESPONSE TO COMMENT LETTER FROM CAROLYN DORROH (ATTACHMENT TO THE RAMONA COMMUNITY PLANNING GROUP LETTER), DATED MARCH 23, 2005

Responses to Comments S1 through S6:
Pursuant to CEQA section 15088.5(f)(2), no response to this comment is provided because this comment relates to a chapter of the original EIR that was revised and Recirculated. See Final EIR, Chapter 2.3 Hazards and Hazardous Materials. Please also see RDEIR responses to comments Letter D, H15 through H42, H59 through H71 and IF1 through IF50.

S3 (cont'd)

protect the historic Mussey Grade Road area.

S4

To use this untested Salvation Army Facility's "shelter in place" solution with human beings is irresponsible and totally unacceptable.

1. It fails to address the possible weak human conditions that can be fatal while experiencing the stresses of a catastrophe.

2. It fails to address what the human brain will conclude as the inexperienced person sees open flames.
3. It fails to address the possible hysterical behavior brought on by panic in a crowd.
4. It fails to address the possibility of rebellion or mutiny with a "no evacuation" suggestion.
5. It fails to address how a child will behave under those circumstances without the comfort and leadership of its trusted parent.

6. It fails to address the willingness of an individual to pass up an opportunity to leave this facility to go sit in a ball field while their vehicle remains vulnerable to destruction.

7. It fails to address smoke inhalation and oxygen depletion in the vicinity of a major fire.

S5

I believe that is a detriment to have a fire marshal that simply applies the fire code to each individual project without dealing with the cumulative impacts of those decisions. This simplistic code application does not deal with the realities of the vast incapability of this community's fire protection services and manning.

S6

There must be multiple accesses to this Salvation Army Facility proposed for 748 people. Risks associated with a "no evacuation" solution makes it unacceptable. The second access should be a road out to Hwy 67 to adequately evacuate the Salvation Army facility without threatening the safety and well being of residents in the Mussey Grade Road area. If a second access can't be provided, then this is the most inappropriate place to put a facility of this capacity.

3/24/2005

SALVATION ARMY DIVISION CAMP AND RETREAT CENTER

FINAL EIR

APPENDIX

TO THE

RESPONSE TO COMMENTS

URBEMIS modeling worksheets

URBEMIS 2002 For Windows 7.5.0

.e Name: <Not Saved>
.ɔject Name: Salvation Army - Building Construction
roject Location: San Diego County
ɔ-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

SUMMARY REPORT
(Pounds/Day - Summer)

ⁿNSTRUCTION EMISSION ESTIMATES

'* 2007 ***	ROG	NOx	CO	SO2	PM10 TOTAL	PM10 EXHAUST	PM10 DUST
TOTALS (lbs/day,unmitigated)	20.76	129.86	177.78	0.00	28.38	5.37	23.01

'* 2008 ***	ROG	NOx	CO	SO2	PM10 TOTAL	PM10 EXHAUST	PM10 DUST
TOTALS (lbs/day,unmitigated)	134.90	86.00	96.88	0.00	3.58	3.52	0.06

URBEMIS 2002 For Windows 7.5.0

ıle Name: <Not Saved>
:oject Name: Salvation Army - Building Construction
:oject Location: San Diego County
ı-Road Motor Vehicle Emissions Based on EMFAC2002 version 2.2

DETAIL REPORT
(Pounds/Day - Summer)

ɔnstruction Start Month and Year: June, 2007
ɔnstruction Duration: 12
ɔtal Land Use Area to be Developed: 9.2 acres
ıximum Acreage Disturbed Per Day: 2.3 acres
ıngle Family Units: 0 Multi-Family Units: 0
ɜtail/Office/Institutional/Industrial Square Footage: 80000

ɔNSTRUCTION EMISSION ESTIMATES UNMITIGATED (lbs/day)

Source	ROG	NOx	CO	SO2	PM10 TOTAL	PM10 EXHAUST	PM10 DUST
*** 2007***							
ıase 1 - Demolition Emissions							
ıgitive Dust	-	-	-	-	0.00	-	0.00
:f-Road Diesel	0.00	0.00	0.00	-	0.00	0.00	0.00
ı-Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ɔrker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum lbs/day	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ıase 2 - Site Grading Emissions							
ıgitive Dust	-	-	-	-	23.00	-	23.00
:f-Road Diesel	20.61	129.68	174.48	-	5.36	5.36	0.00
ı-Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ɔrker Trips	0.15	0.18	3.30	0.00	0.02	0.01	0.01
Maximum lbs/day	20.76	129.86	177.78	0.00	28.38	5.37	23.01
ıase 3 - Building Construction							
ldg Const Off-Road Diesel	12.04	89.19	90.81	-	3.86	3.86	0.00
ldg Const Worker Trips	0.16	0.09	2.00	0.00	0.03	0.00	0.03
:ch Coatings Off-Gas	0.00	-	-	-	-	-	-
:ch Coatings Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
sphalt Off-Gas	0.00	-	-	-	-	-	-
sphalt Off-Road Diesel	0.00	0.00	0.00	-	0.00	0.00	0.00
sphalt On-Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00
sphalt Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum lbs/day	12.19	89.28	92.81	0.00	3.89	3.86	0.03
Max lbs/day all phases	20.76	129.86	177.78	0.00	28.38	5.37	23.01
*** 2008***							
ıase 1 - Demolition Emissions							
ıgitive Dust	-	-	-	-	0.00	-	0.00
:f-Road Diesel	0.00	0.00	0.00	-	0.00	0.00	0.00
ı-Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ɔrker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum lbs/day	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ıase 2 - Site Grading Emissions							
ıgitive Dust	-	-	-	-	0.00	-	0.00
:f-Road Diesel	0.00	0.00	0.00	-	0.00	0.00	0.00
ı-Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ɔrker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum lbs/day	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ıase 3 - Building Construction							
ldg Const Off-Road Diesel	12.04	85.10	93.64	-	3.50	3.50	0.00
ldg Const Worker Trips	0.14	0.09	1.86	0.00	0.03	0.00	0.03
:ch Coatings Off-Gas	122.31	-	-	-	-	-	-
:ch Coatings Worker Trips	0.13	0.06	1.53	0.00	0.03	0.00	0.03
sphalt Off-Gas	0.24	-	-	-	-	-	-
sphalt Off-Road Diesel	0.00	0.00	0.00	-	0.00	0.00	0.00
sphalt On-Road Diesel	0.05	0.78	0.18	0.00	0.02	0.02	0.00
sphalt Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Maximum lbs/day	134.90	86.00	96.88	0.00	3.58	3.52	0.06
Max lbs/day all phases	134.90	86.00	96.88	0.00	3.58	3.52	0.06

ne: 3

ase 1 - Demolition Assumptions: Phase Turned OFF

se 2 - Site Grading Assumptions
rt Month/Year for Phase 2: Jun '07
ase 2 Duration: 1.3 months
-Road Truck Travel (VMT): 0
-Road Equipment

o.	Type	Horsepower	Load Factor	Hours/Day
1	Graders	174	0.575	8.0
5	Scrapers	313	0.660	8.0
1	Tractor/Loaders/Backhoes	79	0.465	8.0

se 3 - Building Construction Assumptions
art Month/Year for Phase 3: Jul '07
ase 3 Duration: 10.7 months
Start Month/Year for SubPhase Building: Jul '07
ubPhase Building Duration: 10.7 months
ff-Road Equipment

No.	Type	Horsepower	Load Factor	Hours/Day
2	Concrete/Industrial saws	84	0.730	8.0
4	Other Equipment	190	0.620	8.0
2	Rough Terrain Forklifts	94	0.475	8.0

tart Month/Year for SubPhase Architectural Coatings: Apr '08
SubPhase Architectural Coatings Duration: 1.1 months
Start Month/Year for SubPhase Asphalt: May '08
ubPhase Asphalt Duration: 0.5 months
cres to be Paved: 1
ff-Road Equipment

No.	Type	Horsepower	Load Factor	Hours/Day

hanges made to the default values for Land Use Trip Percentages

hanges made to the default values for Construction

RAMONA MUNICIPAL WATER DISTRICT

105 Earlham Street
Ramona, California 92065-1599

Telephone:
(760) 789-1330

RECEIVED
DEC 24 2007
DEPARTMENT OF PLANNING
AND LAND USE

December 19, 2007

Gary L. Pryor
Director
COUNTY OF SAN DIEGO
Department of Planning and Land Use
5201 Ruffin Road
Suite B
San Diego, CA 92123-1666

Re: SALVATION ARMY DIVISIONAL CAMP AND RETREAT; P70-379W^2; ER 98-14-023; SCH#2000031058; RAMONA FIRE DISTRICT SERVICE

Dear Mr. Pryor,

The Board of Directors of the Ramona Municipal Water District, the Responsible Agency for fire protection services within the project area (Salvation Army Divisional Camp and Retreat), at its meeting of November 13, 2007, reaffirmed its previous position that a condition of approval of the expansion of the Salvation Army Camp be the acquisition and development of a secondary access for ingress to and egress from the Camp.

The Salvation Army Divisional Camp Conceptual Fire Protection Plan dated October 2007 failed completely to address the potential impact of the expanded camp and its inhabitants upon the sole ingress and egress routes not only to and from the project, but for hundreds of other individuals who reside along Mussey Grade Road, Ramona.

It is striking in its omission that the proposed Fire Protection Plan fails to address in even a cursory way the major issue raise by the Ramona Municipal Water District Board of Directors when it addressed this issue previously and made its earlier decision to mandate a secondary access to the project as a condition of expansion.

Despite representations regarding shelter in place plans and proposals, the Fire Protection Plan itself states in section 6.2 that "...in case of fire, the preferred plan is relocation."

In addition to evacuation being the preferred option in the face of an approaching fire as set forth in its own Fire Protection Plan, there is no guarantee, nor is any offered, that occupants of the camp will not, despite contrary instructions, evacuate from the camp during a fire incident in their own private vehicles.

It is striking that he Fire Protection Plan, in defining and identifying existing access and other "systems" within the project borders, fails to identify and define the parameters and limitations of the sole access to the project area, specifically Mussey Grade Road, the so-called "Tunnel of Death."

Mussey Grade Road is a two lane (1 lane each direction) paved road from Highway 67 to its dead end above the San Vicente Reservoir. It is the sole access and exit not only for the Salvation Army camp, but also for the hundreds of individual residents residing along and off of this rural tree-lined road.

Recent experiences during the Cedar Fire revealed the limitations of a single access to this area. During a fire event, the competing factors of incoming emergency vehicles and outgoings evacuating residents and guests, along with the real potential threat of complete road closure due to falling trees or power lines, make the situation treacherous and could have given rise to a disaster in terms of human and property loss.

During the Cedar Fire, Mussey Grade Road was choked to a standstill by evacuees. In the event of a large tree fall or power line drop, evacuation from the area or the availability of emergency services to the area would be compromised.

Now, in the face of this ongoing and real danger, the Salvation Army seeks to potentially add hundreds of individuals and vehicles joining other residents in evacuating through this sole and inadequate exit from the area.

In section 5.2.1 of the Fire Protection Plan, alleged "secondary access" is discussed. It is a specious argument. The "access' addressed is a dirt road on the eastern portion of the project **south** of the primary access road to the project. This access **cannot** be used for evacuation and exits onto Mussey Grade Road.

Based upon a full and thoughtful review of the project and the proposed Fire Protection Plan, The RMWD Board has once again taken the position that a secondary access to the project be mandated as a condition of the camp expansion.

Very truly yours,

Robert E. Krysak
President, RMWD Board of Directors
With Board authority

cc: Tom Brammell, RMWD General Manager
RMWD Board of Directors

County of San Diego

GARY W. ERBECK
DIRECTOR

RICHARD HAAS
ASSISTANT DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION
5201 RUFFIN ROAD, STE. C
SAN DIEGO, CA 92123
(858) 565-5173 / 800-253-9933 FAX (858) 694-3105

RECEIVED
APR 16 2003
The Salvation Army
Sierra Del Mar Division

April 10, 2003

TO: Department of Planning and Land Use (DPLU) (O-650)
Attention: Joseph Farace, Planner

FROM: Frank Gabrian, Supervising Environmental Health Specialist
Land & Water Quality Division
Department of Environmental Health (DEH)

MAJOR USE PERMIT (P70-379W2) - (DEH #VS0442) - SALVATION ARMY DIVISIONAL CAMP AND RETREAT - 14488 Mussey Grade Road, Ramona, Ca. (APN: 322-030-020 *et al*)

DISCUSSION:

This Major Use Permit modification proposes an approximate twenty-year phasing of improvements to the existing camp and retreat facility. These changes are not time certain. Proposed construction include an administration center, "snack bar", clinic, multipurpose facility, mini-theater, swimming pool, bath house, dining facility, staff housing, activities building, cabins, yerts, dining pavilion, classrooms, conference center and a maintenance yard.

This Department has reviewed onsite wastewater system designs for a reduced version of the project. The reduced project version has no impact on previously designed and approved onsite wastewater systems.

RECOMMENDATION:

DEH, Land & Water Quality Division has no objection to approval of the Major Use Permit modifications with the following conditions:

Prior to issuance of building permits:

1. All plans for new construction of the swimming pool and the food facilities shall be reviewed by DEH for conformance to applicable codes and standards.

2. Prior to issuance of *any* septic tank permit, the applicant shall provide a detailed, engineered layout of the onsite wastewater system for the related structure or phase development. In addition to standard design features of onsite wastewater systems, the layouts shall include the following:

   a. Distribution of flows to quadrants or cells with an application rate not to exceed saturation of

more than 500 linear feet when dosing at three to four hour intervals.

b. Discharge to the tested areas as defined on site maps on file with DEH.

c. Pump system designs by a Registered Professional Engineer.

d. Dosing mechanism designs.

e. Effluent filters for each septic tank.

f. A summary description of a maintenance program for septic tank sludge removal, pump maintenance and effluent filter cleaning.

g. A description of best management practices (BMP) to prevent stormwater runoff during construction of the onsite disposal systems.

h. Description of waste strength for any structure producing other than residential strength sewage effluent and design features to deal with high strength effluent.

3. *Prior to Use and Reliance of the Major Use Permit*, the applicant shall provide backflow protection at the meter to the satisfaction of the Ramona Municipal Water District. The applicant shall also provide a written advisory to DEH that agrees to the following:

   a. None of the existing wells shall be interconnected to the potable water supply.

   b. An annual cross connection survey shall be completed by a qualified cross connection specialist and forwarded to DEH for review and inclusion in the Use Permit file.

4. *Prior to Use and Reliance of the Major Use Permit*, the applicant shall obtain DEH approval of a Vector Control Management Plan. that includes control of vectors of disease associated with hiking trails, camp bedding, ponds and water courses. This Vector Management Plan shall also include a summary of measures to minimize fly breeding and rodent infestation.

5. *Prior to Use and Reliance of the Major Use Permit*, the applicant shall pay off any deficit account with the Department of Environmental Health.

BASIS OF RECOMMENDATION:

Percolation testing, groundwater separation studies, soil character assessment and a nitrate discussion have been completed with recommendations by Vinje & Middleton Engineering, Inc. (Reports dated November 2, 2000 , June 21, 2001, October 29, 2001, and January 9, 2003, by Ralph M. Vinje, GE 863). Design factors for length, flows and safety factors were in collaboration with DEH. Potable water is provided by the Ramona Municipal Water District.

The applicant can receive assistance for vector control issues from DEH, Vector Control and Surveillance Division at (598) 694-2888.

Should there be any questions, please contact Frank Gabrian by Internet at frank.gabrian@sdcounty.ca.gov or by phone at (858) 694-3718.

cc: Major David Hudson, c/o The Salvation Army, 825 Seventh Avenue, San Diego,CA 92101
Malcolm Vinje, Vinje & Middleton Engineering, 2450 Vineyard Avenue, Suite 102, Escondido, CA 92029-1229

County of San Diego

GARY W. ERBECK
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
619-338-2222/FAX 619-338-2315/1-800-253-9933
www.sdcounty.ca.gov/deh/lwq

JACK MILLER
ASSISTANT DIRECTOR

DATE: December 21, 2009

TO: David Sibbet, DPLU Planner
Department of Planning and Land Use (DPLU)

FROM: Kevin Spence, Environmental Health Specialist
Department of Environmental Health (DEH)
Land & Water Quality

P70-379W2, VSO 442, SALVATION ARMY CAMP & RETREAT CENTER, 14488 MUSSEY GRADE ROAD, RAMONA, APN 322-030-02 et al

SCOPING DISCUSSION:

DEH has reviewed engineering and plot plans dated December 18, 2009 from Vinje & Middleton Engineering, Inc. for onsite waste water treatment systems supporting structures proposed for a major use permit modification located at the Salvation Army Divisional Camp & Retreat. The applicant is proposing a 20 year phased plan to accommodate a total occupancy of 615 people at build out to include guests, staff and other support personnel. The proposed engineering includes the following:

1. Administration Building, Snack Bar and Clinic (map code #11)
2. Multipurpose Facility and Mini-Theater (map code #19, #20)
3. Pool Bath House (map code #34)
4. Pool (map code #34)
5. Main Dining Facility (map code #16)
6. Staff Housing, 3 structures (map code #6)
7. Activities Building (map code #22b) and 150 Seat Amphitheater (map code #22a)
8. 7 Cabins (map code # 10)
9. 9 Cabins (map code #17)
10. Conference Center, 7 structures (map code #23)

RECOMMENDATION:

The Department of Environmental Health Land and Water Quality Division has no objection to the approval of this Major Use Permit Modification (P70-379W2) with the following conditions:

1. Prior to issuance of building permits all plans for the construction of swimming pools and food facilities shall be reviewed and permitted by the DEH Food and Housing Division Plan Check unit.

2. Prior to issuance of any septic system permit, the applicant shall provide an engineered layout of the onsite waste water system for the related structure or phase development. For pump systems provide an engineered system design by an approved professional.

3. Prior to use and reliance of the major use permit modification:

    a. Prior to use and reliance of the major use permit modification in regards to increased occupancy, the applicant shall contact the DEH Food and Housing Division to evaluate and update the existi ng camp permit FG # 433916.

    b. Prior to use and reliance of the major use permit modification, the applicant shall obtain DEH approval of a Vector Control Management Plan. This plan shall include control of vectors of disease associated with hiking trails, camp bedding and living quarters, ponds and water courses.

    c. Prior to use and reliance of the major use permit modification, the existing recreational vehicle and the connected holding tank shall both be removed.

4. All potable water for the entire Camp and Retreat shall be provided by Ramona Municipal Water District.

5. All existing wells shall be used for irrigation only and or properly secured per State and County standards. No wells will be allowed to be interconnected to the potable water supply.

6. All use, generation and storage of hazardous materials shall be required to be reviewed by the DEH Hazardous Materials Division.

If you have any questions please call (858) 495-5483.

Kevin Spence

Kevin Spence, Environmental Health Specialist

Cc: Malcolm Vinje, Vinje & Middleton Engineering, Inc., 2450 Vineyard Avenue, Suite 102, Escondido, CA. 92029-1229

Tim Gnibus, BRG Consulting, Inc., 304 Ivy Street, San Diego, CA. 92101-2030

Llew Munter, Department of Environmental Health, Land & Water Quality Division