



# San Miguel Fire & Rescue

*Service Beyond Expectations*

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February 22, 2022

Mr. Robert Hingtgen  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Via Email: [Robert.Hingtgen@sdcounty.ca.gov](mailto:Robert.Hingtgen@sdcounty.ca.gov)

Re: Cottonwood Sand Mine Project; Draft Environmental Report  
PDS2018-MUP-18-023

Dear Mr. Hingtgen,

Thank you for the opportunity to provide comments and recommendations on the Cottonwood Mining Project (“Project”), located within our District boundaries.

### **San Miguel Fire District’s Role:**

The San Miguel Consolidated Fire Protection District (“SMFPD” or “District”) is one of the largest fire districts in San Diego County. As the Fire Authority Having Jurisdiction (“FAHJ”) over the Project, SMCFPD is responsible for providing emergency services and fire and rescue protection to the Project and its surrounding communities.

In California Health and Safety Code Division 12, Part 2.7, Section 13801, the Legislature found that local fire protection services, emergency medical services, rescue services, and other services relating to the protection of life and property is critical to the public peace, health, and safety of the State. Recognizing that the State’s communities have diverse needs and resources, the *Fire Protection District Law of 1987* was enacted to provide broad statutory authority for local officials so that they could adapt powers and procedures to meet their own circumstances and responsibilities.

SMFPD has adopted as the *Fire Code for The San Miguel Consolidated Fire Protection District*, the following: the *2019 California Fire Code*, the *2018 International Fire Code (IFC)*, the *National Fire Protection Associations Standards 13, 13R & 13-D* as references in Chapter 80 of CFC, and the *2020 County of San Diego Consolidated Fire Code*, together with the District’s amendments, as Ordinance No. 2019-2. The SMFPD Fire Code was adopted for the protection of the public’s health and safety. As such, SMFPD is charged with reviewing and providing comment on projects that have the potential to adversely affect the health and safety of its citizens.

## COMMENTS AND RECOMMENDATIONS

The District has identified health and safety concerns within the DEIR that effect the Community related to the following:

LU-2.8: Mitigation of Development Impacts: Requires measures that minimize significant impacts to surrounding areas from operations that are detrimental to **human health and safety**.

LU-6.10: Protection from Hazards: Requires that development be designed to protect residents from the risks of **artificially induced hazards**.

LU-12.2: Maintenance of Adequate Service: Requires development to mitigate significant **impacts to existing service levels of public services for existing residents and businesses**.

M-4.4: Accommodate Emergency Vehicles: Requires the design and construction of public roads to allow for necessary **access for appropriately sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents**.

S-3.6: Fire Protection Measures: Requires that development located within fire threat areas implement measures that **reduce the risk of structural and human loss due to wildfire**.

SMFPD offers the following comments and recommendations to assist the County in identifying and mitigating Project impacts affecting the health and safety of the Community.

### Specific Comments

#### 1) Emergency Response Time Delays

Based upon DEIR Section 3.1.7, the Project anticipates an increase in Heavy Truck traffic of 88 trucks per day with 440 average daily trips (ADT) and 36 ADT for cars and light trucks along Willow Glen Drive (a Project total of 476 ADT). The significant increase in Heavy Truck traffic (at times traveling at slower speeds and potentially impacting/obstructing traffic flow), raises significant concerns with regard to the health and safety of the Community when considering Emergency Services. While it is understood CEQA analysis no longer uses road congestion or driving delays when analyzing transportation impacts for environmental and greenhouse gas purposes, the 440 ADT Heavy Truck impact is not negligible, nor should it be avoided when considering impacts to emergency response times and evacuation routes.

As noted in the DEIR Local Mobility Analysis Section 5.3 - Existing Intersection Traffic Volumes, traffic counts were commissioned on Thursday, August 30, 2018, between the hours of 7:00-9:00 a.m. and 4:00-6:00 p.m. in an effort to capture peak commuter activity.

Section 5.3 correctly notes area schools were in session; however, the traffic counts were taken well past the time schools let out for the day and peak school traffic had already passed. As an example, the School closest to the Project, Jamacha Elementary School, a public school, (corner of Steele Canyon Road and Jamul Drive), classes get out at 2:00 p.m. on Thursdays; the second closest school, Hillsdale Elementary, classes get out at 3:30 p.m. It appears the traffic counts obtained for this study missed the peak traffic volume typically flowing when schools let out in the afternoon. This discrepancy warrants reanalysis to provide a more accurate ADT count to 1) ensure impacts to emergency responses are fully understood; and 2) allow us to better address any need for mitigation.

Willow Glen Drive is the most direct roadway used by SMFPD Fire Station 22 First Responders for emergency response travel to the Project, residents, and schools located to the east and southeast of the Project. Given the increase in Heavy Truck traffic and planned construction/flagging operations, it is reasonable to anticipate traffic slowing and/or delays and/or stoppage along Willow Glen Drive throughout the 10+ years of this Project. These impacts should not be viewed as “temporary” given the 10+ year duration of the Project, but an ongoing impact to the main emergency response thoroughfare serving the area.

SMFPD strives to provide our Citizens and those passing through our District with the most rapid emergency response possible. Given that thousands of our residents living beyond the Project live in a rural area designated as a Very High Fire Hazard Severity Zone, (with already longer response times than most areas within our District), we must do everything within our control to reduce every delay the Project might cause.

These health and safety concerns must be mitigated for the benefit of the Community since even short delays in the initiation of emergency medical care can, in some cases, mean the difference between life and death, or even severe cognitive impairment. For example, for patients suffering cardiac arrest, for every minute delay in emergency care, their chance of survival goes down 10 percent.

a) DEIR LU-12.2: Maintenance of Adequate Service:

The DEIR notes in its Technical Appendix B, LU-12.2: Maintenance of Adequate Service: “All intersections within the traffic study area would operate at an acceptable level of service (LOS), with the exception of the intersection of Willow Glen Drive and Muirfield Drive, which is calculated to operate at LOS E or worse (LOS F during AM and LOS E during PM peak period).”

Any traffic congestion due to the anticipated cumulative 1,904 ADT (e.g., 440+36+1,428 Ivanhoe Ranch Project) -- especially during the Project roadway construction phase -- has a reasonable potential for delays as fire apparatus and ambulance vehicles are impacted along Willow Glen Drive. No alternate roadway exists that will allow Station 22 Emergency Responders to reach areas beyond the east and southeast of the Muirfield entrance without significantly re-routing the emergency response.

As an example, consider an emergency response to Jamacha Elementary School. Should traffic become congested due to Project operations and/or construction, or at any point become impassible, the only other road available to reach the School is for Engine 22 to travel west along Jamacha Road through Rancho San Diego, then work its way back to the northeast, before even getting to the School. Typical travel time from Station 22 to Jamacha Elementary School at 2:10pm on a school day, takes 4 minutes to travel the 2 miles to the school<sup>1</sup>. Should roadway slowing or obstructions be encountered, and the emergency response re-routed through Rancho San Diego, that sole, alternate route to the school would take 9 minutes to travel the required 5.1 miles; more than double both in time and distance.

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<sup>1</sup> Based upon MapQuest data 1/11/2022 at 2:10 pm reports Heavy Traffic

Recommendations:

It is imperative that mitigation measures eliminate any potentially life-threatening roadway delay. Recommendations are as follows:

1. Establish an Emergency Use Only by-pass lane. This could be done by extending the proposed vendor access turn lane (at Muirfield) the full length of Willow Glen Drive to Steele Canyon Road. This would give emergency response vehicles the ability to avoid road congestion not only during the proposed roadway improvements but would also allow First Responders to avoid Heavy Trucks headed eastbound and flagging operations throughout the 12-year operation.
2. Develop a Traffic Control Plan addressing emergency access to the Communities beyond the Project; include a contingency plan should Willow Glen Drive fail due to Heavy Truck back up or another Project-related event.
3. End Heavy Truck operations at 2:00 p.m., (i.e., the end of the school day for Jamacha Elementary), in order to achieve the Project's stated intent of avoiding Heavy Truck operations during peak afternoon hours.

2) Emergency Evacuation Routes

As previously stated, thousands of SMFPD's residents live beyond the Project site in a mostly rural, Very High Fire Hazard Severity Zone ("VHFHSZ"); Evacuation Egress Routes are limited and often narrow. Willow Glen Drive, Steele Canyon Road, and Jamul Drive each serve as primary Emergency Evacuation Routes for residents to the east and southeast of the Project. Should any of these roadways fail or become congested during an evacuation from the east, it could prove to be catastrophic.

a) Safety Element Policy S-3.6/LU-12.2 Maintenance of Adequate Service:

The DEIR does not fully comply with Safety Element Policy S-3.6: Fire Protection Measures or LU-12.2: Maintenance of Adequate Service. Both require, in pertinent part, the Project not impact existing public service levels and that measures be implemented to reduce the risk of structural and human loss due to wildfire. Although the DEIR as proposed addresses site-specific fire protection measures, it does not address or include analysis for Project impacts to emergency evacuations of the Community beyond the Project site. Given the substantial Heavy Truck traffic proposed, the VHFHSZ rating, and the long-term occupation of the Project, newly identified health and safety concerns identified by the publication of DEIR must be addressed.

Thousands of residents rely on Willow Glen Drive as a primary emergency evacuation route. With its acknowledgement that the Willow Glen Drive/Muirfield Drive intersection falls below an acceptable LOC (i.e., LOS F and E), as well as the Willow Glen Drive/Steele Canyon Road intersection, it is imperative these deficiencies are addressed to reduce the risk of human life due to wildfire.

The additional Heavy Truck trip projection of 440 trips per day when viewed both independently and cumulatively with the Ivanhoe Ranch Project (an additional 1,428 ADT),

has the potential to significantly impair these primary egress routes. Project applicants should be required to fully comply with all aspects of the Safety Element Policy and Adequate Service requirements to reduce the risk of human loss due to wildfire for all life during emergency evacuations, including those off-site who are evacuating due to a wildfire emergency.

Recommendation(s):

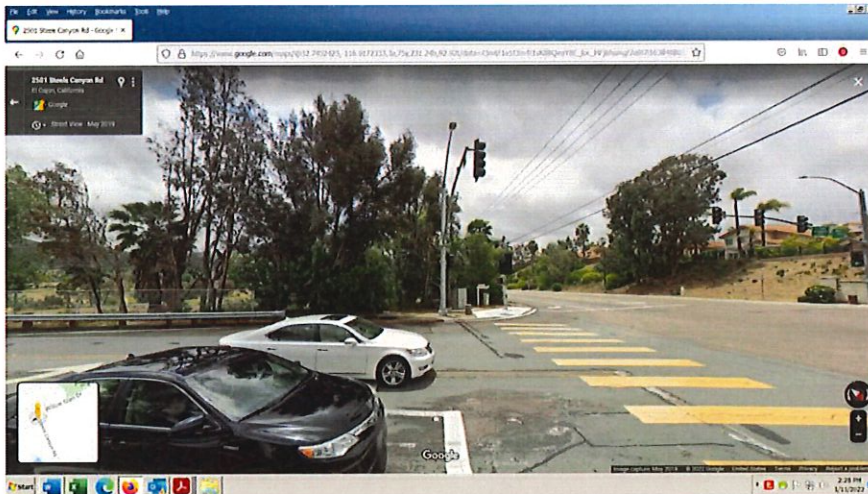
1. Develop a Traffic Control Plan for the Project that addresses actions to be taken during an emergency evacuation from the Communities located beyond the Project. Plan to include cessation of any additional Heavy Truck or vendor vehicles accessing the site during an active emergency evacuation, and a contingency plan should Willow Glen Road fail due to Heavy Truck back up or other Project-related event.

The 440 ADT increase in Heavy Truck traffic through the Willow Glen Drive/Steele Canyon Road intersection (traveling eastbound) exponentially increases the existing life safety hazard.

a) Line of Sight Hazard at Steele Canyon Road:

The LU-6.10: Protection from Hazards element requires that development be designed to protect residents from the risks of artificially induced hazards.

Line-of-sight for vehicular travel eastbound on Willow Glen Drive approaching Steele Canyon Road is severely obstructed. That stretch of roadway has a posted speed limit of 45mph. Heavy Trucks have a longer stopping distance than light vehicles. As such, the 440 ADT Heavy Truck traffic has the potential to increase roadway hazards at this intersection. Mitigation of the hazard created by Heavy Trucks approaching this intersection when northbound traffic from Steele Canyon Road turns right on a red light (as allowed) must be addressed.



1/11/2022 screen shot courtesy of Google Earth.

Recommendation:

1. Develop a plan to abate this hazard. This could be done by roadway realignment and/or, at a minimum, through removal of vegetation obstructing the required line of sight.

Thank you again for the opportunity to provide comment on this Project. Should you have any questions or need further clarification on any point, please do not hesitate to contact me.

Sincerely,



Criss Brainard  
Fire Chief