

**MUSSEY GRADE ROAD**

**ALLIANCE**



*"Preserving Historic  
Mussey Grade"*

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June 10, 2008

**BY EMAIL**

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.

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.

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.

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.

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.

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”)<sup>1</sup> 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***

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<sup>1</sup> 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.

*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.*

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.**

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.

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.*

**- 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.**

- **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,<sup>2</sup> 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.

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:

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

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:

- **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.
- **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).

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<sup>2</sup> 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

- **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.
- **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.

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

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