

**Appendix F:  
Comment Letters From Agencies and Cities**

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11  
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*Flex your power!  
Be energy efficient!*

January 13, 2003

Ms. Chantal Saipe  
County of San Diego  
Tribal Liaison  
1600 Pacific Highway, Rm. 212/MS A-6  
San Diego, CA 92101

Dear Ms. Saipe:

This letter is a follow-up to our September 30, 2002 letter regarding the County of San Diego's study, Update on Impacts of Tribal Economics Development Projects in San Diego County.

Following you will find a number of updated estimates reflecting some needed improvements to the State Highway system. The proposed improvements are operational and/or capacity increasing. It should be noted that these estimates were developed without detailed assessment. Additionally, it is advised that the following information be used only for planning purposes.

- Interstate Route 8 – Operational Improvements and/or Capacity Increasing

-Operational Improvements at Crestwood/Live Oak Springs ramps, Post Mile (PM) 61.1. Widen off ramps and undercrossing:

\$2.4 million for implementation costs (\$2 million for construction, and \$0.4 million for support)

Environmental cost not included

-Operational Improvement at West Willows, bridge widening PM 31.3:

\$5.1 million for implementation costs (\$2 million for right of way, \$2.6 million for construction, and \$0.5 million for support)

Environmental cost not included

-Capacity Improvement, new interchange at PM 32.8:

\$38 million for implementation costs (\$20 million for right of way, \$15 million for construction, and \$3 million for support)

Environmental cost not included

- State Route 67 – Capacity Increasing Improvements

-Six lanes from Maplevue Street, PM 5.5 to Willow Road PM 6.7:

\$13.4 million for implementation costs (\$1 million for right of way, \$8 million for construction, and \$4.4 million for support)

\$28 million for environmental cost

- State Route 76 Operational Improvements and/or Capacity Increasing

-Operational Improvements along State Route 76 from Interstate Route 15, PM 18.7 to the eastern boundary of La Jolla Indian Reservation, PM 43.7, which includes standard shoulder widths, maintenance vehicle pullouts, passing lanes, curve corrections and other traffic improvements:

\$546 million for implementation costs (\$133 million for right of way, \$305 million for construction, and \$108 million for support)

\$37 million for environmental costs

-Capacity Improvements, four lanes along State Route 76 from Interstate Route 15, PM 18.7 to the eastern boundary of La Jolla Indian Reservation, PM 43.7:

\$829 million for implementation (\$218 million for right of way, \$446.5 million construction, and \$164.5 million for support)

\$63.1 million for environmental costs

- State Route 94 – Capacity Increasing Improvements

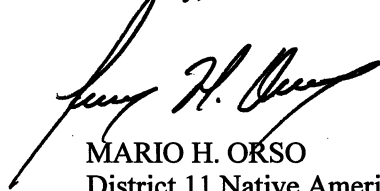
-Six lanes from State Route 125, PM 10.1, to the Jamul Indian Village, PM 20.94:

\$200.8 million for implementation costs (\$30.8 million for right of way, \$125.2 million for construction, and \$44.8 million for support)

\$33 million for environmental costs

The above environmental mitigation costs include major wetland creation, plant establishment, and land purchases for wildlife refuges.

Sincerely,



MARIO H. ORSO  
District 11 Native American Liaison

# SAN DIEGO RURAL

FIRE PROTECTION DISTRICT  
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JAMUL, CALIFORNIA 91935  
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DCAO

SEP 24 2002

COPPER

Chantal Saipe  
Tribal Liaison  
San Diego County Board of Supervisors  
1600 Pacific Highway  
San Diego, California 92101

Re: San Diego Rural Fire Protection District's Response To The Draft Update on Impacts of Tribal Economic Development Projects in San Diego County

Dear Ms. Saipe:

Please allow this to constitute the Rural Fire Protection District's ("RFD" or "District") response to the Draft Update on Impacts of Tribal Economic Development Projects in San Diego County ("Report").

First, let me say that District appreciates the opportunity to provide input to the County regarding this issue. However, the RFD is somewhat disturbed regarding the manner in which this report was prepared. For example, in a conversation with one of our Directors, Dale Amato, you advised that the County did not consult with or even contact the RFD in order to determine if any of the information used in the report was accurate. Your response to Director Amato was that you had obtained all of your information from the Tribe, that you were aware of some inaccuracies and that you expected the inaccuracies to be corrected through the public comment process. Had you simply contacted the District directly, as you did the tribe, the report may have been more accurate.

With that said, the RFD writes to correct some of the inaccuracies in the report and to comment upon the information contained within the Jamul Indian Village ("Tribe") section of the report, which is found at pages 32 through 37.

- The Report, at page 33, states that the lease that the District has with the Tribe for the use of the land on which Station 66 and the District offices sit expires on either January 1, 2004 or January 1, 2009. Please be advised that in December of 2001, the District exercised its option under its lease to extend the lease term through January 1, 2009.
- The Report, at page 36, states that the District rejected an offer by the Tribe to: 1) relocate the Station 66 and the District offices to another location; and 2) contribute \$20 Million over the next 20 years. That information is inaccurate and misleading. In August of 2000, the Tribe issued a "Memorandum of Understanding" between itself and the RFD regarding the relinquishment of the leased property upon which Station 66 and the District office sit. The original MOU called for the District to relinquish its lease on the property for a payment of \$2 Million. That offer was rejected by the District. In May of 2001, the Tribe again made an offer regarding the relinquishment of the leased property. That offer called for the Tribe to contribute \$4 Million to the construction of a new fire station on Tribal land that would be leased for a term of 50 years at \$1.00 per year. The offer also called for the District to provide fire protection and emergency medical services to the casino project only for an additional payment of \$75,000 per month. At that time, despite the fact that the RFD was being told that the a casino was the only facility being contemplated for the project, the RFD was in possession of a Memorandum of Understanding between the Tribe and Lakes Gaming that

clearly stated the scope of the project included a gaming facility, hotel, golf course, retail stores and an entertainment facility. This was contrary to what the RFD was being told by the Tribe. As can be seen by the EIS Scoping Report, the District's concerns about the scope of the project far exceeding what was represented has been borne out. The introduction of additional elements other than a casino increases the scope of the project, and thus, the traffic, which increases the fire and emergency medical risks that the RFD would have to protect against that occur off of tribal land. Because of this, the RFD determined that should the project include the facilities that are mentioned in the EIS scoping report, the \$4 Million offered at that time would not adequately cover the personnel, equipment and facilities recourses needed to respond to the increased fire and emergency medical calls that the project would bring to Jamul. It was not until the publication of the July 2002 EIS Scoping Report that the full scope of the project was identified.

At the May 1, 2001, RFD board meeting, the District voted to reject the offer and discontinue negotiations with the Tribe until and unless the Tribe was forthcoming with information regarding the full scope of their project. The District expressly stated that it would recommence negotiations with the Tribe regarding the leased property if and when all of the necessary BIA approvals to conduct Class III gaming were given. To date, this has not occurred. .

- The report also discusses trip generation estimates to the casino project at far less than what will be realized. The Report, at page 16 of Appendix "C," entitled "Traffic Needs Assessment Of Tribal Development Projects in the San Diego Region—Summer 2002," clearly states that the 9,180 daily trips the project will bring to Jamul is based upon inaccurate data in that it only included the casino and did not include the other facilities such as the hotel, entertainment center, golf course and retail center which are identified in the EIS Scoping Report. This will need to be updated. From the County report, using the existing baseline average daily trips (ADT) information and the trip generation data for each of the elements of the proposed project, the additional traffic volume that the project will expect to generate into Jamul is 15,820 daily trips.<sup>1</sup> When this figure is added to the already 17,000 average daily trips into Jamul (as is evidenced the segment of Highway 94 between Steele Canyon Road and Lyons Valley Road-which represents the volume of traffic in and out of Jamul due to the fact that there are no other intersections or segments on which cars can enter or exit Hwy 94), the total ADT into Jamul, due to the casino project, is 32,820. The Steele Canyon Road and Lyons Valley Road segment is already at a LOS "F." The next two segments leading to the project are already at 8,000 ADT and, when the 15,820 figure is added to it, the total ADT in "downtown" Jamul is 23,820. An LOS grade of "F" is established by an ADT of 23,800. The expected traffic that the project will bring into Jamul far exceeds that level. The Report establishes a LOS grade of "F" for the segment of Hwy 94 leading into Jamul and to the project when developed. (See, Table 3 of Appendix "C," entitled "Traffic Needs Assessment Of Tribal Development Projects in the San Diego Region—Summer 2002.") By the County's own admission, this grade was established by considering only a 9,180 increase in ADT for the casino itself and not the remainder of the

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<sup>1</sup> Based upon the data contained in the County report and the scope of the project as established by the EIS Scoping Report, the following ADTs are established for the various elements of the project:

Casino:	100 trips per 1000 sf of gaming space (91,800 sf gaming space x 100/per 1000 sf=9,180 ADT)
Hotel:	3 trips per room (223,000 sf of hotel is approximately 265 rooms x 3 trips per room=795 ADT)
Ent. Center:	40 trips per 1000 sf (24,000 sf of entertainment center x 40/per 1000 sf= 960 ADT)
Retail:	27 trips per 1000 sf (155,000 sf of retail space x 27/per 1000 sf= 4,185 ADT)
Golf Course:	700 ADT per course

project. The total of 32,820 projected ADT into Jamul exceeds the 23,820 LOS "F" figure by 9,000.

It is clear that the increased traffic will substantially effect the delivery of fire and emergency medical services, even if the fire station is moved from the existing site. The increased traffic on Hwy 94 and the inability to adequately mitigate the already sub-standard road conditions will cause delays in responding to incidents.

- The "Public Safety" section of the report, found at page 122, fails to address the impact that the project will have on the delivery of fire protection and emergency medical services to the area. Clearly, the delivery of fire protection and emergency medical services are as important, if not more important, than the issues of air resources, biological resources, multiple species conversation and dark skies which are addressed in the report. For your review and consideration, we have enclosed the RFD's March 29, 2001, response to the Bureau of Indian Affairs regarding the Tribe's Environmental Assessment. This documents should be reviewed and incorporated in to the County's analysis regarding the potential impacts that the Tribe's project will have on the public safety of the residents of Jamul.

Thank you for the opportunity to provide input to the county on this very important issue facing our local governments. If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Nissen", with a horizontal line extending to the right.

Dave Nissen,  
Acting Fire Chief

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# SAN DIEGO RURAL

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FIRE PROTECTION DISTRICT  
14145 HIGHWAY 94  
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Mr. Ronald M. Jaeger  
Regional Director  
Pacific Region  
Bureau of Indian Affairs  
2800 Cottage Way  
Sacramento, CA 95825

March 29, 2001

**REFERENCE: Comments Regarding Environmental Assessment for the proposed conveyance of approximately 101 acres of fee property to federal trust for the Jamul Indian Village and development of a casino and associated infrastructure, San Diego County, California**

Dear Mr. Jaeger,

Thank you for the opportunity to respond to the proposed action and the extension for our response that you granted to us. We would like to express to you our concerns regarding the Environmental Assessment and our findings regarding public safety for the community of Jamul, which will be significantly impacted by the proposed action. We are concerned regarding the Trust Application (or the summary that we received from the BIA), which is misleading and in conflict with the EA in that it says the principal immediate use of the land will not change. This is not true. While they say that the purpose of the land will "aid to economic development", it does not mention a casino. We are concerned about this conflict.

Based on our comments we urge you and the BIA to find AGAINST adopting a FONSI (finding of no significant impact statement) and that you adopt a no action alternative UNTIL AND UNLESS A FULL Environmental Impact Statement is prepared. Our recommendation to do so is based on the conflicting reports of the San Diego County Impact Study, the Hunt Analysis, the Application for Trust and the Environmental Assessment for the Jamul Indian Village Project.

Mr. Jim Hunt of Hunt Research was retained by the District to perform a study of fire protection and emergency medical services to the Jamul Community Service Zone. The document entitled Analysis of Fire Protection and Emergency Medical Services for the Rural Fire Protection District – Jamul Community Service Zone and the addendums as adopted by the District Board of Directors is being submitted ("EXHIBIT A") to support our rebuttal to the proposed action which disputes comments contained in the Environmental Assessment performed on behalf of the Jamul Indian Village.

In the Analysis and specifically on page i of the report, Mr. Hunt after extensive research, concluded that:

1. The Rural Fire District is not adequately equipped or staffed to provide an adequate level of emergency response and fire and life safety to the proposed Jamul Indian Village project.
2. The net impact is estimated to be a net impact of 1,809.6 calls per year to the Jamul Indian Village project (4.9 incidents per day).
3. The total incident response to the proposed project and the community is 2,783.3 (7.6 incidents per day).
4. The total incidents represent a projected incident response increase of nearly 300%.
5. The existing fire station 66 would be too close to the Casino entrance (within 150 feet) for safe community response purposes.
6. The increase in traffic generated by the Jamul Indian Village project will increase the risk of accident and will potentially delay response from the station due to traffic congestion.
7. Compliance with the minimum requirements of the Fire and Building Codes does not result in providing adequate offsets to the existing level of service.

Statistics were utilized to determine the necessary resources and in consideration of the built in protection features listed in the Hunt Report. They are based on data provided by the Jamul Indian Village project consultants, SANDAG Internet statistics, Sycuan Fire Department, Viejas Casino incidents, the Las Vegas Fire Department and the Clark County Nevada Fire Department. Other reports, including the San Diego County Board of Supervisors Report of the Potential Impacts of Tribal Gaming on Northern and Eastern San Diego County, indicate a deviation from those numbers, which could significantly impact the District and would require review of the resources and the impact to service upon the community. Some statistics indicate that there could conceivably be an increase in traffic up to 4 times greater, that responses by the District could be 6 times higher and estimates of vehicle trips per day increasing from 10,000 to 34,000 trips per day. We should note that the project description contained in the EA and what we are being told has been inconsistent. First, while the EA mentions a hotel, the tribe claims that no hotel is being built. A recent SEC 10-K405 filing by Lakes Gaming, the Jamul Indian Village's partner in the casino project, states that Lakes Gaming is building a "casino resort facility with the Jamul Indian Village in California" (emphasis added) and that "development of the casino resort will begin once various regulatory approvals are received." (emphasis added) Also the Business Strategy section of that document states "Lakes develops, constructs and manages Indian-owned casino properties that offer the opportunity for long-term development of related



*entertainment facilities, including hotels, theaters, recreational vehicle parks and other complimentary amenities designed to enhance the customers' total entertainment experience and to differentiate facilities managed by Lakes from its competitors.*" Thus the District is also concerned about the potential expansion of the existing proposed project and its deleterious impacts on the community and the District's ability to properly deliver fire protection and emergency medical services.

The Hunt report clearly identifies on page i and page ii, the impacts to the District even without a contract for service. Mr. Hunt states *"The Jamul Indian Village project presents potential impacts to the Rural Fire Protection District even if the Village does not contract for fire protection and emergency response from the District."* Those impacts cited by Mr. Hunt are:

1. Increased traffic accidents and other related emergencies in Highway 94.
2. Vegetation fires caused by juveniles and careless smokers.
3. Possible domestic violence related to gambling and causing EMS calls.
4. Possible burglaries by gamblers to obtain money, with arson set fires to cover up the crime.
5. Possible arson/spite fires or violence from disgruntled gamblers.
6. Larger fires and more severe EMS outcomes caused by delayed response due to heavy traffic.
7. Reduced availability of Automatic and Mutual Aid companies to the Jamul Community Service Zone, if they are committed to incidents at the Jamul Indian Village.
8. Unavailability of private ambulance response in the Community Service Zone due to the commitment to incidents at the Jamul Indian Village project.
9. The large increase in traffic generated by this project will impact emergency response from off site fire stations and other emergency vehicles.

There are inconsistencies in the EA as it relates to the traffic and the LOS on Highway 94. First, while the EA refers to it as a highway, we point out that it is a narrow two-lane road. You may get the wrong impression about the nature of the road and the impact of the traffic from what is contained in the EA. In July of 1998, San Diego Association of Governments (SANDAG) initiated the Rural Highway 94 Corridor Study formulated by the Technical Advisory Committee, submitted for approval to the Policy Advisory Committee, approved in September 2000 by the Board of Directors of SANDAG and transmitted to Caltrans, District

11 and the County of San Diego. (The District was a participating member of the Technical Advisory Committee represented by the Fire Chief.) Several recommendations were the by-product including one that *"Caltrans revise planning documents, such as the Highway 94 Transportation Concept Report, to reflect Highway 94 as a two-lane conventional highway between Steele Canyon Road and its junction with Ribbonwood Road/Interstate 8 near the community of Boulevard."*

We note that, according to the report, that the average daily traffic (ADT) between Steele Canyon and Lyons Valley Rd. as of 1998 was 16,100. This constitutes a level of service (LOS) at "E". (A LOS of "F" is the worst rating.) The latest data available (SANDAG 1999 traffic counts) indicates the ADT is 17,100. (According to Caltrans, when the of Highway 94 reaches 23,800 the LOS rating becomes an "F", the worst rating possible.) This is the prime arterial that fire apparatus, paramedic ambulances and automatic or mutual aid resources use to access the Greater Jamul area and to travel to San Diego area hospitals. The secondary roadway, Jamul Drive, is a winding two-lane road, which is not desirable for emergency use. Several accidents on Highway 94 have closed the road and impeded the delivery of emergency services. It should be noted that these do not have to be terrible accidents that severely injure or claim lives. One such accident was a non-injury accident, knocking down utility poles with electrically charged wires, closing the road and diverting traffic for several hours. The increased traffic will make responding to vegetation fires, which are at a high rating, more difficult. There will be political pressure from other districts to provide mutual aid, which our district relies on heavily in emergencies, if we are unable to respond outside our community due to traffic delays or delays due to other calls.

Jamul Drive, the secondary route becomes bumper to bumper and due to the narrow road, does not permit emergency vehicles to pass other vehicles. The next route would be an additional 20 to 45 minutes of transport time for patients by using Otay Lakes Road. This could require a 3<sup>rd</sup> paramedic ambulance at Station 77 Deerhorn Honey Springs or Station 78 Dulzura in case the traffic load is according to the County data. It would not be an unreasonable assumption that this segment of Highway 94 will be closed to traffic at least once per month with the added traffic of the project. Based upon consecutive traffic numbers estimates to generated by the proposed action the ADT will increase to an estimated 26,385, which exceeds the number for the poorest rating that Caltrans gives to highways which is an "F", by 10.9%.

According to the recommendations of SANDAG, no capacity increasing improvements on Highway 94 are planned to be constructed. The report states *"In addition, non-capacity increasing operational improvements such as passing lanes, turnouts, and curve realignments also will be needed to provide better operating and safer conditions in the corridor."* All of this without consideration to the added traffic that the proposed project would add to the ADT count. We are informed that no major road improvements, such as widening to four lanes, are projected by Caltrans for the next 10 years. According to the County of San Diego, the present date taxpayer cost to widen the road from Steele Canyon to Jefferson is estimated at \$225,000,000 according to one report.

Additionally the ADT between Lyons Valley Road and Melody Lane as of 1998 is 8,100 with a LOS of "E". An additional 10,285 vehicles would increase the ADT to 18,385 or 26.8% beyond the 14,500 ADT to be considered as LOS "F" by Caltrans. Adding more traffic will, regardless of the LOS designation, certainly make an already dangerous highway far worse, significantly impacting the delivery of fire and EMS.

We need to note that the Traffic Study in the EA admits the following: *"The project will have significant impacts on these segments (Hwy 94 between Jamacha and casino) as well as on Campo Road between Maxfield Road and the casino driveway. Mitigation to address these impacts would be to improve SR 94/Campo Road to 6-lane primary standards between the freeway terminus and Lyons Valley Road and to improve SRS-94/Campo Road between Lyons Valley Road and the casino driveway to four-lane collector status. These improvements would address project impacts and restore the operations to LOS D or better".* This mitigation is not mentioned anywhere in the text of the EA. The only mitigation efforts referenced are controlled signal lights, which would seem to congest traffic even more.

The added traffic will severely impact the District's ability to deliver emergency services to the community. The EA addresses no proposed mitigation and in fact states that no mitigation is necessary. We hope that you find in favor of the District and require that mitigation be included regarding the financial and resource impact that the District will be exposed to if this project is approved as submitted.

Furthermore, this is a bedroom community where most residents commute to and from work each day using Highway 94 with a driving time of 15 minutes to one hour. Anything happening on this road with respect to emergencies or accident will affect the entire community.

The delivery of emergency medical services and fire protection for the project has been determined by the Hunt Report and Addendum to the report by the Board of Directors, which is attached and is considered the basis for the establishment of the required resources for the project based on the statistics provided. Deviation from those statistics, which increases the numbers, will severely impact the Districts ability to provide services and require review, modification and a potential increase in resources.

The Environmental Assessment on page 2-3 states, *"The Tribal Council has adopted the standards of the Uniform Building Codes, including all uniform fire, plumbing, electrical, mechanical and related codes. These standards will be followed when constructing the proposed facilities."* The utilization of the UBC and UFC falls short of the standards of reasonable fire protection for a facility of the proposed type and size. The utilization of a systems approach incorporating the components of built in protection, proper access, proper water supply, adequate on duty staff, equipment and apparatus must be used in a project of this magnitude and impact. To establish levels of service and standards of coverage, nationally accepted good practice consensus standards such as Insurance Service Office (ISO), the National Fire Protection Association (NFPA), Cal-OSHA, the International City and County Management Association and other tactical benchmarks are to be used to ensure low probability and low outcome (loss of life and property) as the result of an incident.

The Environmental Assessment on page 2-3 states *"The Tribal Government shall make reasonable provisions for adequate emergency, fire, medical, and related relief and disaster services for patrons and employees of the gaming facility."* While the gaming facility is addressed, the severe impact upon the delivery of emergency services that will impede the District from providing service at the current level, offsite (to the communities impacted) of the proposed facility has not been addressed. Reasonable provisions for adequate fire protection, emergency medical incidents and hazardous materials have been identified in the Hunt report, which should be enforced without exception. The responsibility to provide this protection is the sole responsibility of proponent of the proposed action. The District, based on the Hunt Report and addenda's requires the resources for the project based upon the statistics provided in the EA. Any increase in the scope of the project will require additional resources.

If this project is constructed and the Fire District is not relocated, the ability of the District to service the community will be significantly impacted. By keeping the facility at it's current location the response times to both fire and emergency medical incidents will be drastically increased. Fire incidents will be larger with greater fire losses and increased loss of life. Emergency medical services response times will also increase having an effect on the quality and outcome of life. If this project is approved, it is imperative that the facility be relocated at the total expense of the tribe and to the District's specifications and requirements.

The Environmental Assessment on page 2-5 addresses water for fire protection stating *"No water delivery would be needed to meet irrigation, toilet flushing or fire flow demands since reclaimed water would be used."* The proposed use of reclaimed water to attain the required fire flow is unacceptable. The risk of firefighter exposure to waste or infectious disease is not acceptable. The District does not permit the use of reclaimed water in the District. If reclaimed water is used to attain fire flow, the Fire Chief will strongly recommend to the District's Board of Directors that a District policy be established prohibiting the use of fire district personnel at the proposed project and resources at any time no matter how critical the need may be. In addition, page 2-7 of the EA states that the reclaimed water would be piped to an on-site fire-flow tank while on pages 2-5 and 2-7 it states that the wastewater would be also used for landscape irrigation and casino toilets. The use of reclaimed water is again referenced on page 4-30 of the Environmental Assessment for the project and in several other locations.

The Tribe stated on page 2-3 of the Environmental Assessment that *"The Tribal Council has adopted the standards of the Uniform Building Codes, including all uniform fire, plumbing, electrical, mechanical and related codes. These standards will be followed when constructing the proposed facilities."* This is not permitted by the UFC, as on-site water supplies for fire protection are exclusively for fire protection only. These statements contained in the EA are conflicting. Otay Water District currently has an 8-inch water main serving the current Jamul Indian Village with fire hydrants in place. Additionally there is a 12-inch main on Melody Lane and a 16-inch main on Highway 94. With this water supply and existing service, reclaimed water should be prohibited for any fire protection features for the proposed project.

While no mention has been made to the acquisition of water from well sources, the District would oppose this action due to existing wells in the vicinity to ensure that an adequate water storage supply is available for fire protection when required. This is extremely important because our water table would be severely impacted by a usage of an additional 59,000 gallons per day.

On page 2-7 of the Environmental Assessment it is stated, *"This facility would be sized to allow for dual use between the fire district and local law enforcement."* The Fire District has determined that a facility for the District Offices and Station 66 requires approximately 17,500 square feet. This statement is significant because of the proposed design and space needs for the fire station in the EA may be greater if the station is housed with a sheriff's substation. The details of space required and the specific functional operation of law enforcement has not been discussed with the District. Any square footage required by *"local law enforcement"* must be in addition to the footage required by the District. In addition additional space for a training tower, mechanical repairs and a helipad for both air ambulances and the sheriffs ASTREA has not been addressed.

An agreement for re-location to a facility owned by the Jamul Indian Village and leased to the Fire District should be enforceable by all local and state laws. Likewise, a contract by the District to provide service to the Jamul Indian Village project should also be enforceable by all local and state laws. This is important as on at least one occasion, the tribe threatened to fence off part of the leasehold. This may be indicative of how the tribe will deal with the District, and more importantly, the impact on the District to deliver fire and EMS protection to the community if they are allowed to develop. (Letter attached as "EXHIBIT B")

Page 2-7 of the Environmental Assessment describes access to Highway 94 from the proposed relocated fire station as a "controlled signalized intersection" which could be any type of device. The only device that is acceptable to the District is the Opti-Com System, which is designed and marketed by 3M®. While the intersection of Highway 94 and Melody has been vaguely addressed, no mention has been made to the exit onto Melody from the proposed fire facility (18% of traffic will come by way of Proctor Valley to Melody according to EA report and a station at that site will be impacted by the traffic flow), the other existing traffic signals along Highway 94 to Jamacha Road and the other proposed traffic control devices in the response area. Due to the profound impact that traffic will have in the limited arterials the project must be responsible to provide the devices to all traffic signals and the units that would be required in the District apparatus to operate them, which would number approximately 15, including duty chief response vehicles.

The station and district offices sits on .82 acres of parcel that is 4.35 acres (parcel #1). If the station does not relocate, then the proposed entrance to the casino could be less than 150 feet from the only exit driveway of the station entrance, which would severely impact the delivery of fire services based upon the additional traffic that will be backed up trying to enter and exit the casino.

The EA on page 3-48 states *"The San Diego Rural Fire District covers 690 square miles in the southwestern portion of San Diego County."* which is incorrect information. The square miles protected by the District are 720 located in the southeastern portion of San Diego County.

The EA states on page 3-48 *"People requiring emergency medical attention would have the option to be transported to any of these hospitals."* This statement is not accurate as San Diego County has an established triage system in which medical control directs the patient to the most appropriate facility based on the patient's illness or injury and may not be the patient's hospital of choice. While air ambulance capacity is mentioned, there has been no accommodation made to provide for a helipad (see facility size) to accommodate an air ambulance. This is due to distance to the nearest level 1 trauma center and/or the patient's condition and the impeded traffic conditions (LOS "F" and road closure due to accidents) that would be detrimental to a patient's ultimate outcome must be considered and included.

Page 4-33 of the EA states, *"Typical fire district calls to similar facilities in the State involve occasional car and garbage can fires."* While the typical incidents to the project may be garbage can fires and motor vehicle fires, as stated in the EA, this will be the highest percentage of fires. Additional fires as referenced in the Hunt Report are the incidents of concern to be prevented. To do so, emphasis must be placed on exceeding the minimum standards for fire protection features that are built in to the facility. The outcome by being proactive is the steps to prevent the large scale, multi-fatality incident from occurring. While the probability of a large scale incident occurring may be low, the outcome of an incident from the planned project could be catastrophic with the minimal features of fire protection that has been proposed.

The exclusive use of the UBC and UFC falls short of the standards of reasonable fire protection for a facility of this type and size. The utilization of a systems approach incorporating the components of built in protection, proper access, proper water supply, adequate on duty staff, equipment and apparatus is critical. To establish levels of service and standards of coverage, nationally accepted good practice consensus standards such as Insurance Service Office (ISO), the National Fire Protection Association (NFPA), Cal-OSHA, the International City and County Management Association and other tactical enhancements are to be used to ensure low probability and low outcome (loss of life and property) as the result of an incident. Without built in tactical and proactive enhancements the resources requirement increases significantly.

The Hunt report identifies several scenarios to determine, based on NFPA and OSHA standards (which govern fire and EMS agencies), the necessary personnel and resources to adequately control and extinguish a fire at the proposed project. Consider the scenario on page 2-8 of the Hunt Report for a fire involving less than 0.5% of the proposed project. This fire scenario requires the response of 44 firefighters to control and manage the incident within 16 minutes. Based on the current service levels, 55 to 60 minutes will elapse until these resources are assembled. This delay will jeopardize firefighter safety, the safety of the occupants and negatively impact the outcome of this incident. If this project is to move

forward and be approved, it must be with the requirements of fire protection outlined in the Hunt Report.

Additionally, due to the location of the project a catastrophic event affecting the San Diego Region and/or the District will prevent additional necessary resources from reaching the proposed project for a period of 24 to 72 hours.

The EA has stated that the Jamul Indian Village may contract for services with the Fire District. To contract, it is imperative that the District feels comfortable with the liability it would assume. A contract between the District and the Tribe has not been entered into, nor have negotiations commenced. The District has not agreed or relinquished the rights to our valid lease, which does not expire until January 1, 2008. (See lease attached as "EXHIBIT C")

The EA states on page 4-33 that *"Calls to 911 are dispatched to the nearest available ambulance."* While not completely untrue, the initial request from 9-1-1 dispatch for emergency medical services is to the responsible fire agency having jurisdiction and then to a paramedic ambulance.

On page 6-7 of the EA under 6.8 Public Services it states, *"No mitigation is necessary for the Proposed Action."* We strongly disagree and would argue that the proposed action will have a significant impact on the existing level of service to the community and that there would be significant degradation in the existing level of service that the residents of the community currently enjoy. Throughout the EA document and specifically on page 4-33 *Fire Protection* it states, *"The staffing is currently not adequate to service the proposed action. Therefore, additional staffing would be needed to be addressed as a part of a contract."* The current level of service is not capable of handling the impact of the project, but no mention has been made regarding the impact that all of the additional offsite incidents will have, let alone how the District is to manage those incidents. Based on the 10,285 additional daily traffic projected increase, the District can anticipate a minimum increase of 162% in motor vehicle accidents and other incidents related to the highway. This will also impact the ability of the District to respond from a single facility location and demands and justifies the second facility as defined by the Hunt Report. The Environmental Assessment is not accurate and lacks the consideration of the offsite impact that the community will be ill equipped to manage. This project would severely impact the residents of the Community and have a significant impact on the quality of life without appropriate and significant mitigation.

The San Diego Rural Fire Protection District has been improperly listed as an agency of San Diego County on page 7-2 of the EA. The San Diego Rural Fire Protection District is a governmental agency (Special District) formed under the statues of the State of California and is not affiliated nor governed by the County of San Diego. The District should have been represented in the same manner as the listing for the Otay Water District.

The size and scale of the casino is not compatible with the surrounding outbuildings, commercial buildings and neighborhoods that the District is prepared to protect. Our ability to fight a large-scale structure fire in the proposed project without additional equipment is limited. While we understand that if the District contracts with the tribe to provide the project

with fire services, and will most likely get the funding for that equipment through the contract or other agreement, it simply will not provide for the off-site impact that the District will need to manage. We are an under-funded and predominately volunteer agency, which is not addressed by the EA.

With the casino and planned community structure, there is need for an additional station with no funding in sight. This impact will increase the District's response times. The District, cannot meet the needs of the community without significant financial contribution (\$2,059,000 first year, operational, apparatus and equipment and facilities for two stations) from either the community or the tribe. If the community is to foot the bill for the increased services because of the casino, CSZ fee increases and bond issue expenses will average approximately \$1,181.57 per each residence in the community. This is a significant financial impact by the proposed project.

Currently, due to a lack of funding the District can only employ minimum paid personnel, supplemented with reserves and volunteers. There is a lack of funding to expand a higher level of services throughout the District. The District is under-funded, receiving less than \$400,000 in yearly property tax revenue to operate 14 stations in an area of 720 square miles. If the project is built, a second station will have to be built and staffed immediately. This will cost the taxpayers approximately \$309.00 per year for apparatus and operational costs. Additionally a bond issue for 30 years would cost an additional \$62.00 per year. The tax and bond issue would be in addition to an already in place Community Service Zone fee of \$100.00 for each residence. The total estimated cost to each residence would be approximately \$570.00.

In light of the recent school shootings in our region, it seems that the EA does not consider the potential for a catastrophic occurrence, especially an earthquake. The EA does not mention the inclusion of the casino patrons or the County disaster plan. San Diego County has informed our district that in case of an earthquake or other natural disaster that we may be on our own for up to 24 – 72 hours. This District does not have adequate ability to provide aid to the community and would be further impacted if a casino were partially or fully occupied. In addition there are three separate school sites where 1,400 students currently attend. These young students would require a high level of assistance in the face of any disaster.

We should point out that the Reduced Intensity Alternative (2-8), while it will increase traffic on the already overburdened road, would significantly reduce the traffic on the road when compared to the proposed project. This Reduced Intensity Alternative anticipates a 66,800 sq ft facility instead of a 265,000 sq ft facility, 25% of what is proposed. The EA correctly states that the smaller scale facility would reduce the traffic congestion, but is not "desirable" because it does not bring in enough revenue (2-9). In connection with delivery of fire and EMS services a smaller scale operation would help to ensure that the district is not overtaxed by the size and scale of the project and the potential impacts that the traffic will have on the highway. However, the construction of the smaller scale project would still have significant adverse impacts on the delivery of fire and emergency medical services.



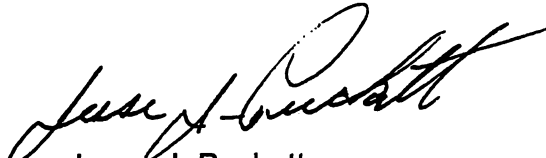
Based upon the above, it is our belief that we have provided more than adequate support for the BIA to not adopt a FONSI finding and for the BIA to adopt a no action alternative UNTIL AND UNLESS A FULL Environmental Impact Statement is prepared.

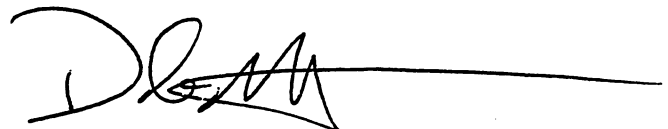
Thank you for your consideration to this matter.

Sincerely,

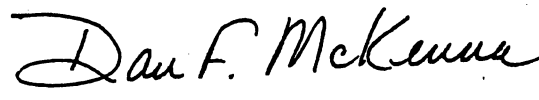
  
Larry Baldwin  
Chairman of the Board

  
Randy Terry  
Vice-Chairman

  
Jesse J. Puckett  
Secretary

  
Dale Amato  
Director

  
Will Eastwood  
Director

  
Dan F. McKenna  
Fire Chief

CC: Chairman Montie R. Deer, National Indian Gaming Commission  
Mr. Virgil Townsend, Superintendent, Bureau of Indian Affairs, Riverside, CA.  
Senator Dianne Feinstein  
Congressman Duncan Hunter  
Senator Barbara Boxer  
Mr. Gale Norman, Secretary of the Interior  
Governor Gray Davis  
Senator Steve Peace  
Senator Dede Alpert  
Assemblywoman Charlene Zettel  
Supervisor Dianne Jacob  
Texas American, Jerry Argovitz

**“Exhibit A”**

**San Diego Rural Fire Protection District  
Board of Directors Motion on Hunt Report and  
Addendum by the Board  
March 20, 2001 Special Board Meeting**

A motion by Director Amato and second by Director Terry to use the Hunt Report as a guideline for planning for the Jamul Community Service Zone for the provision of Emergency Medical Services and Fire Protection to the community with the addendum's that were submitted and introduced by the Board. Other supporting materials will be included as they are developed and reviewed to maintain a flexible and adaptable plan. The resources defined in the plan are based upon the statistics included in the Hunt Report. Any changes to those statistics will require the review of all resources to ensure that an adequate level of service will be maintained and provided to the community.

**VOTE: Yeas – Amato, Baldwin, Puckett, Terry Nays: none Abstain: Eastwood**

**The Addendum is attached as a staff letter.**

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# SAN DIEGO RURAL

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FIRE PROTECTION DISTRICT  
1145 HIGHWAY 94  
JAMUL, CALIFORNIA 91935  
(619) 669-1188 FAX (619) 669-1798

Mr. Larry Baldwin, Chairman  
Members of the Board of Directors  
San Diego Rural Fire Protection District  
14145 Highway 94  
Jamul, CA 91935

Dear Director Baldwin and Members of the Board,

I am providing comment and recommendations to you from myself and staff in response to *The Analysis of Fire Protection and Emergency Medical Services for the Rural Fire Protection District Jamul Community Service Zone performed by Hunt Research Corporation.*

While staff supports the major content of the Hunt Report there are several points that need clarification, correction and/or additional comment.

Reference  
Report  
Page Number  
& Subject

Clarification, Correction and/or Comment

**iv & 2-1 Prevention**

The San Diego Rural Fire Protection District is already a proactive organization and one of the leaders in the field of prevention in San Diego County for our type of organization. The District is currently one of few in the County that has adopted a residential sprinkler ordinance in addition to the Uniform Fire Code. We have been a proponent to implement and adopt on a countywide basis the Wildland Urban Interface Code. In light of the recent Viejas Fire the District has partnered in a collaborative effort with the BLM and Forest Service to bring a Firewise Workshop to the District, which is to be held on the 31<sup>st</sup> of March in Jamul.

While the District enforces the initial vegetation management plan, current resources of the District do not exist to improve and implement an ongoing educational program for Vegetation Management of existing homes let alone the resources to implement and maintain a Vegetation Management Plan.

**2-4 Current EMS Level**

Hunt Research states "The current EMS level is manageable by a 3 person Engine Company and a Medic ambulance." While not a complete conflict, District staff recommends that the District attempt at all times to adhere to the National Benchmarks for EMS response having a four-person response by the District rather than the 3.2 average.

Reference  
Report  
Page Number  
& Subject

Clarification, Correction and/or Comment

**2-5 Incident Statistics**

Hunt Research has gone to great lengths to produce estimated incident statistics for use and consideration by the District to determine impact to the District. In the opinion of staff, Hunt Research has been fair in establishing these estimates for our consideration by using the numbers of incidents generated on the average per 1,000 population in San Diego County, existing casino's incident statistics in San Diego County and those statistics and type of incidents generated by the Las Vegas area fire agencies. Regardless of the numbers presented and for the sake of argument, the important issue is that even if the incidents statistics are reduced (the report projects 1,809.6) by 75%, the reduction does not and will not reduce the necessary resources listed in the report.

**2-6 Fire Incident Types**

While there has been discussion by others regarding the type of incidents that Hunt Research has listed, the fact is that they are listed as potential. Consideration to the "potential" is a necessary component of any analysis. I support the Hunt Research list of potential types of incidents and base it on my extensive fire service background and experience and in particular my experience in risk management while employed for Sea World of Ohio.

**7-1 Item 1-c Training Officer**

This position has been filled and is an expenditure of the General Fund budget.

**7-1 Item 1-e Full Time Secretary**

I agree that the part time secretarial position should be a FTE. However, I disagree that the Jamul CSZ should be responsible for the additional funding necessary and that the wages for the position should continue to be provided by the General Fund budget.

**7-1 Item 1-f Full Time Mechanic**

District staff agrees that a mechanic for the District at the FTE position will be needed in the near future. The current system has worked well over the past several years. However, as the number of incidents have increased the Captain/Mechanic combination that is currently used to provide mechanical preventative maintenance, repairs and major repairs whether on duty or on days off is finding it difficult to accomplish this important task. District staff argues that this position should not be included in the Jamul CSZ and the position should be a General Fund budget obligation.

Reference  
Report  
Page Number  
& Subject

Clarification, Correction and/or Comment

**7-1 Item 1-g Contractual Plan Checker**

**- Item 1-h Civilian Fire Inspector Plan Checker**

District staff upon review recommends that these positions become one, with shared cost and that the position be an individual cross-trained in suppression. The position should be at the rank of Captain. The Fire Marshal would act as the Plan Checker for the project. I believe that this would be an improved utilization of resources.

**7-1 Item 2 a & b Cross Trained Suppression Personnel**

It is strongly encouraged that the plan require the development of a rotational duty schedule for the personnel assigned to the ambulance to prevent burnout of the paramedics and EMT's and to maintain skill levels of those assigned to the engine companies and ambulances.

**7-1 Item 4 a 2000 GPM Quint**

District staff has completed an assessment based on the conceptual plan contained in the Environmental Assessment for the proposed Jamul Indian Village Casino. Based on the configuration, setbacks required and building and parking garage height a 105' to 109' aerial device is required. Please see Appendix I for justification.

**7.1 Item 4b Interface Engine  
4c Reserve Engine**

All engines should be the same configuration equipped with same engines, pumps, CAF system and compliment of equipment. This will then allow the mechanic to stock parts for repairs with less stock required and permit familiarity with equipment for the staff.

**7.1 4c ALS Ambulances**

Consideration to utilization of a medium duty chassis such as Freightliner, International, Ford and GMC in place of the typical F-350 chassis is strongly recommended. While the typical life span of a F-250 is 5 years, the use of the medium duty chassis can typically extend the life to 10 to 15 years with re-manufacturing of the modular unit and chassis. The initial cost of the medium duty is approximately \$125,000. The F-250 is \$107,750. From a financial, mechanical and operational perspective the higher initial cost is more cost effective over the long run. See chart below.

<u>Year</u>	<u>Light Duty</u>	<u>Medium Duty</u>	<u>Action Required on Medium Duty</u>
Initial	\$107,750	\$125,000	Purchase new
5 <sup>th</sup>	\$107,750	\$50,000	Refurbish box and paint chassis
10 <sup>th</sup>	\$107,750	\$50,000	Refurbish box and paint chassis
Total	\$323,250	\$225,000	

**10.3 Estimated Fair Share Costs to Jamul Indian Village Project**

Hunt Research clearly stated that the numbers produced in the report need to be verified by the District. Based on the recommended components I am recommending revising initial costs and, annual costs. Contained in this chart are specific implementation time frames for which I provide our recommendations. I first address our recommendations below and a revised chart as below.

<b>Item</b>	<b>Hunt Estimate</b>	<b>District Estimate</b>	<b>Implementation</b>
Fire Facility	\$2,800,000	\$2,800,000	Prior to Casino
Quint	\$695,000	\$639,625	30 days after construction
Engine	\$369,150	\$369,150	30 days prior to operation
Mini-Pumper	\$120,000	\$130,000	30 days prior to operation
ALS Ambulance	\$107,750	\$125,000	30 days prior to construction
Staffing (4 FF's)	\$553,998	\$571,998	Varies See Staffing page 6
Staffing ALS	\$274,000	\$274,000	30 days prior to construction
Equipment	\$20,000	\$21,500	As required
O & M	\$28,000	\$35,000	Per contract agreement

**Fire Station  
Operating and Maintenance**

Staff recommends that the figure be revised from \$28,000 to \$35,000 to reflect and include insurance cost and increased electrical consumption.

**Fire Station  
Financing and Implementation Time Frame**

The financing cost in the Hunt Research report is grossly low. Financing on lease purchase is only available for a period of 10 years. Bonds are the second method of financing the facility that the tribe would have to sell. Current bond market reflects a rate of 8% to 9%. Using 9% bond rate would equate to \$277,449.07 per year for a period of 30 years maintaining a complete construction cost of \$2,800,000 with no down payment.

I disagree with the implementation time frame. The response from the station during the construction phase would be affected and suggest that the facility be constructed as soon as possible and prior to casino construction.

**2000 GPM Quint**

**Initial Cost, Annual Cost, Financing and Implementation Time Frame**

Hunt Research has submitted a quote of \$695,500 for a Pierce ladder truck. While Pierce produces an excellent product, they are the Rolls Royce of fire apparatus.

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& Subject

**Clarification, Correction and/or Comment**

Considering other manufacturers in the mid-range will produce a highly desirable product that will meet and exceed the Districts expectations for many years. The product can then be acquired for a cost estimated to be \$639,625 including equipment and sales tax. By example, I disagree with the annual payment in that it has been understated. Based on no down payment and a 10-year lease purchase (maximum period) at 4.9% (quoted rates on 3/2/01) the annual payment would be \$82,673.63 per year.

During the course of construction, accidents and fires may occur. I believe that the quint should be delivered no later than 30 days after construction has commenced on the project.

**Reserve Engine (2000 GPM)**

**Financing and Implementation Time Frame**

By example, I disagree with the annual payment in that it has been understated. Based on no down payment and a 10-year lease purchase (maximum period) at 4.9% (quoted rates on 3/2/01) the annual payment would be \$47,713.85 per year.

The implementation time frame for the reserve engine can be 30 days prior to operation.

**ALS Ambulance**

**Initial Cost, Annual Cost, Financing and Implementation**

In review of the ALS program I am strongly recommending the utilization of medium duty chassis for the ambulance. The initial higher cost reflected in the amount of \$17,250 is easily amortized over 10 to 15 years as opposed to the average 5-year life expectancy of a light duty chassis. Personal past experience reduced maintenance costs by 90% when using the medium duty chassis. The ability to re-furbish the box and chassis every five years, results in the recovery of the initial additional capital outlay. The budget price recommended for the ALS ambulance is \$125,000. See chart on page 3 for comparison.

Based on no down payment and a 4-year lease purchase at 4.6% (quoted rates on 3/2/01) the annual payment would be \$34,967.69 per year.

The implementation time frame should be 30 days prior to any construction occurring on any land of the Jamul Indian Village.

**Mini Pumper/ Type III Engine**

**Initial Cost and Annual Costs**

I disagree with the initial and lease cost provided. Based on no down payment and a 5-year lease purchase at 4.7% (quoted rates on 3/2/01) the annual payment would be \$29,832.84 per year on \$130,000.



**Reference  
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Page Number  
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**Clarification, Correction and/or Comment**

**Staffing - Engine**

**Initial Cost, Annual Cost and Implementation Time Frame**

Three (3) firefighter/paramedics should be hired prior to any construction occurring on any land of the Jamul Indian Village.

Upon construction of the casino three (3) Captains should be hired.

30 days prior to the completion of the casino project three (3) engineers and three (3) firefighter/EMT's should be hired.

We disagree with the initial cost and annual cost for personnel. The personnel are one (1) Captain, one (1) engineer, one (1) firefighter/paramedic and one (1) firefighter/EMT per shift. We believe that the Hunt report failed to include the wage disparity for the paramedic resulting in an increase.

**Staffing – ALS Ambulance**

**Implementation Time Frame**

Three (3) firefighter/paramedics should be hired prior to any construction occurring on any land of the Jamul Indian Village.

Upon construction of the casino three (3) firefighter/EMT should be hired.

**Miscellaneous Equipment**

**Implementation Time Frame**

The time frame should be flexible enough to permit acquisition as it becomes necessary.

**10-4 Estimated Fair Share Costs to SDRFPD**

Hunt Research clearly stated that the numbers produced in the report need to be verified by the District. Based on the recommended components I am recommending revising initial costs and, annual costs. Contained in this chart are specific implementation time frames for which I provide our recommendations.

<b>Item</b>	<b>Hunt Estimate</b>	<b>District Estimate</b>	<b>Implementation</b>
Fire Facility	\$1,300,000	\$1,300,000	When possible
Engine	\$369,150	\$369,150	30 days prior to operation
Rescue (USAR)	N/A	N/A	Purchased. Del. 6/2001
ALS Ambulance	\$107,750	\$125,000	30 days prior to operation
Staffing (4 FF's)	\$553,998	\$571,998	Varies See Staffing page 8
Staffing ALS	\$274,000	\$274,000	60 days prior to operation
Equipment	\$14,000	\$15,500	As required
O & M	\$20,000	\$25,000	As required

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Page Number  
& Subject**

**Clarification, Correction and/or Comment**

**Fire Station - Skyline  
Operating and Maintenance**

Staff recommends that the figure be revised from \$20,000 to \$25,000 to reflect and include insurance cost and increased electrical consumption.

**Fire Station  
Financing and Implementation Time Frame**

The financing cost in the Hunt Research report is grossly low. Financing on lease purchase is only available for a period of 10 years. Bonds are the second method of financing the facility that the District would have to sell. Current bond market reflects a rate of 8% to 9%. Using 9% bond rate would equate to \$128,815.64 per year for a period of 30 years maintaining a complete construction cost of \$1,300,000 with no down payment.

I disagree with the implementation time frame. The time frame to hold an election, the sale of bonds, the permit process and construction could prove to be 3 years, and that is only if it is approved.

However, the District has established a plan through the mitigation fee program in which the District has dedicated funds that could be used in advance of actual construction for land acquisition for the station site. This most likely could be a cash transaction.

**Interface Engine  
Initial Cost, Annual Cost, Financing and Implementation Time Frame**

All engines should be the same configuration equipped with same engines, pumps, CAF system and compliment of equipment. This will then allow the mechanic to stock parts for repairs with less stock required and permit familiarity with equipment for the staff.

Based on no down payment and a 10-year lease purchase (maximum period) at 4.9% (quoted rates on 3/2/01) the annual payment would be \$47,713.85 per year.

The District could utilize the existing engine 66 as the reserve engine recommended in the report, moving the new engine to the District station.

**ALS Ambulance  
Initial Cost, Annual Cost, Financing and Implementation**

In review of the ALS program I are strongly recommending the utilization of medium duty chassis for the ambulance. The initial higher cost reflected in the amount of \$17,250 is easily amortized over 10 to 15 years as opposed to the average 5-year life expectancy of a light duty chassis. Personal past experience reduced maintenance costs by 90%

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**Clarification, Correction and/or Comment**

when using the medium duty chassis. The ability to re-furbish the box and chassis every five years, results in the recovery of the initial additional capital outlay. The budget price recommended for the ALS ambulance is \$125,000. See the chart on page 3.

Based on no down payment and a 4-year lease purchase at 4.6% (quoted rates on 3/2/01) the annual payment would be \$34,967.69 per year. There should be no cost to the District, as EMS user fees will cover the cost of the ambulance.

**Staffing - Engine  
Implementation Time Frame**

The District currently employs three (3) Captains for the District. A portion of the paramedic's salaries on the engine should be compensated from the ambulance revenue

leaving the balance to be funded from CSZ zone funds. As the Simpson Ranch project comes on line with a Mello Roos, those funds should be dedicated to the wages and benefits for the added positions. It is estimated that the Simpson Ranch Mello Roos will generate approximately \$192,000 upon completion.

We disagree with the initial cost and annual cost for personnel. The personnel are one (1) Captain, one (1) engineer, one (1) firefighter/paramedic and one (1) firefighter/EMT. We believe that the Hunt report failed to include the wage disparity for the paramedic resulting in an increase.

**Staffing - ALS Ambulance  
Initial Cost, Annual Cost and Implementation Time Frame**

The CSZ should incur no cost. All costs should be borne by EMS user fees. Implementation can be only by award of the RFP by the County of San Diego to the District.

**Part Time Secretary to FTE**

All wages and benefits are recommended to be attributed to the general fund budget expenditure.

**Civilian Fire Inspector**

District staff upon review recommends that these positions become one, with shared cost and that the position be an individual cross-trained in suppression. The position should be at the rank of Captain. The Fire Marshal would act as the Plan Checker for the project. I believe that this would be an improved utilization of resources.

All wages and benefits are recommended to be attributed to the general fund budget expenditure and cost shared with the Jamul Indian Village project on an ongoing basis.

## Summary of Proposed Facility Sites and Costs As Revised by Staff

After review by staff I am submitting our recommendations for budget purposes including capital expenses, personnel and operating and maintenance. The following charts depict affiliated costs with the Jamul Indian Village Project station and the proposed facility for the general area of Skyline Truck Trail and Jamul Vista. These costs will assist with determining a fair share and/or contract cost for the Jamul Indian Village project if the Board so desires.

### Jamul Indian Village Project Station

<u>Item</u>	<u>Total Cost</u>	<u>Lease Purchase</u>	<u>Funding</u>	<u>Implementation Time Frame</u>
<b>Facility Capital</b>				
Fire Facility	\$2,800,000	\$277,449.07 <sup>1</sup>	N/A by Jamul Indian Village	Prior to Casino Construction
<b>Apparatus Capital</b>				
Quint 105' 2000 GPM	\$639,625	\$82,673.63	Lease Purchase 10 Years 4.9% rate quoted 3-2-01	30 days after Casino construction begins
Engine - 2000 GPM w/CAF	\$369,150	\$47,713.85	Lease Purchase 10 Years 4.9% rate quoted 3-2-01	30 days prior to Casino operation beginning
Mini-Pumper Type III Engine	\$130,000	\$29,832.84	Lease Purchase 5 Years 4.7% rate quoted 3-2-01	30 days prior to Casino operation beginning
ALS Ambulance	\$125,000	\$34,967.69	Lease Purchase 4 Years 4.6% rate quoted 3-2-01	Prior to Casino Construction
<b>Total Apparatus Capital</b>	<b>\$1,263,775</b>	<b>\$195,187.69</b>		
<b>Staffing Cost</b>				
Quint 3 Captains 3 Engineers 3 FF/Medics 3 FF/EMT	\$571,998	\$571,998	Provided via a contract with Jamul Indian Village	Staggered hiring with need
ALS Ambulance 3 FF/Medics 3 FF/EMT's	\$270,000	\$270,000	Provided via a contract with Jamul Indian Village	30 days prior to construction
<b>Operating &amp; Maintenance</b>				
O & M	\$35,000	\$35,000	Provided via a contract with Jamul Indian Village	Stipulate in a contract - advanced
Equipment	\$21,500	\$21,500	Provided via a contract with Jamul Indian Village	Stipulate in a contract - advanced
<b>Total Staffing &amp; O &amp; M</b>	<b>\$898,498</b>	<b>\$898,498</b>		
<b>Total Annual</b>	<b>\$2,162,273</b>	<b>\$1,093,686</b>		
	<b>First Year Cost - Cash For Capital excluding facility</b>	<b>First Year -Cost Capital by Lease Purchase Excluding facility</b>		

### Skyline/Jamul Vista Station

<u>Item</u>	<u>Total Cost</u>	<u>Lease Purchase</u>	<u>Funding</u>	<u>Implementation Time Frame</u>
Facility Capital Fire Facility	\$1,300,000	\$128,815.64 <sup>1</sup>	Financed with voter approved Bonds over 30 years estimated at 9% as of 3-2-01	3 years if bonds approved
Apparatus Capital Engine - 2000 GPM w/CAF	\$369,150	\$47,713.85	Lease Purchase 10 Years 4.9% rate quoted 3-2-01. Down payment most likely available	At station completion.
ALS Ambulance	\$125,000	\$34,967.69	Lease Purchase 4 Years 4.6% rate quoted 3-2-01. Paid for by EMS user fee revenue	On award of contract from the County of San Diego
Rescue USAR	N/A	N/A	Capital replacement fund needs to be included.	Established under current CSZ Capital Replacement
<b>Total Apparatus Capital</b>	<b>\$494,150</b>	<b>\$82,681.54</b>	Provided from CSZ Fund	
<b>Staffing Cost</b>				
<u>Quint</u> 3 Captains 3 Engineers 3 FF/Medics 3 FF/EMT	\$571,998	\$571,998	CSZ Fund and Mello Roos's	Staggered hiring with need
<u>ALS Ambulance</u> 3 FF/Medics FF/EMT's	\$270,000	\$270,000	Paid for by EMS user fee revenue	14 days prior to contract effective date.
<b>Operating &amp; Maintenance</b>				
O & M	\$25,000	\$25,000	CSZ funds – General Fund Budget Station Allocation	As budgeted
Equipment	\$15,500	\$15,500	CSZ funds – General Fund Budget Station Allocation	As budgeted
<b>Total Staffing &amp; O &amp; M</b>	<b>\$882,498</b>	<b>\$882,498</b>		
<b>Total Annual</b>	<b>\$1,376,648</b>	<b>\$965,180</b>		
	<b>First Year Cost - Cash For Capital excluding facility</b>	<b>First Year –Cost Capital by Lease Purchase Excluding facility</b>		
Less EMS Items	\$395,000	\$304,968		
Fire Suppression Cost	\$981,648	\$660,212		

## **Jamul Community Service Zone With the Jamul Indian Village Project Not Being Built**

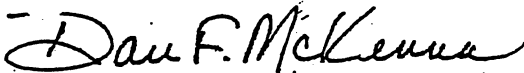
In review of the proposal submitted no consideration was given to planning of resources if the project is not built. While mention is made justifying that two stations are necessary with no contract to the tribe and assuming that the proposed casino is built, it does not address the need for two facilities if the project is not built. It is my opinion that the Board may want to give consideration to this issue. Staff comments regarding this consideration is provided below.

If the casino is not built, potential consideration may be given to the original concept of replacing this facility in several years with a single location as your staff was pursuing prior to the casino issue being brought forward. While this would be completely funded by the public, the development of a facility by future development in the Proctor Valley area and the future development of another facility in the Skyline area well east of the Skyline/Jamul Vista site would be possible with both paid for by development.

With this scenario for your consideration, staff would have to re-visit the staffing, apparatus and equipment requirements.

I hope that you find our information, comments and recommendations regarding the Hunt Analysis useful in your decision making process. As always we remain available for any questions that you may have and look forward to dialogue with you regarding this decision.

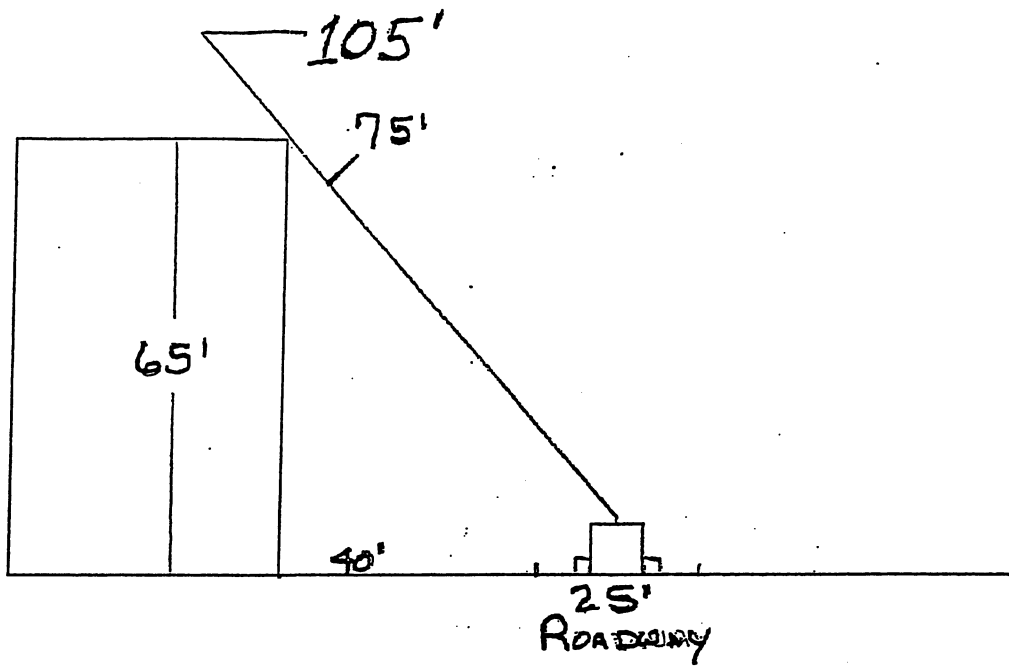
Respectfully Submitted,



Dan F. McKenna  
Fire Chief

# Appendix I

## Quint – Ladder Length Justification Setbacks



**ANALYSIS OF FIRE PROTECTION  
AND  
EMERGENCY MEDICAL SERVICES**

*FOR THE*

**RURAL FIRE PROTECTION DISTRICT  
JAMUL COMMUNITY SERVICE ZONE**



January 2000

*Submitted by*

**HUNT RESEARCH CORPORATION**

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**Appendix:**

1. Map of Jamul Community Services Zone
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3. Fire Station Location Illustrations:
  - Current Fire Station Locations
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  - 1.5 mile Response Circles; Optimum System with Contract to Jamul Indian Village
4. Fire Spread Map; Viejas Fire.

**Synopsis:**

The purpose of this study is to perform a Fire and Emergency Medical Services (EMS) risk assessment of the Jamul Community Services Zone, and the proposed Jamul Indian Village project. The purpose is also to determine the additional needs of the Rural Fire Protection District (RFPD) in the Jamul Community Services Zone with and without the presence of the proposed Jamul Indian Village Casino and Hotel. This study was conducted by Jim Hunt of Hunt Research Corporation (HRC). HRC is the oldest community fire protection consulting and planning firm of its type in California. Jim Hunt has 37 years experience in the Southern California Fire Service. Jim served on several major Fire Agencies and attained the rank of Battalion Chief. He also served as Assistant Fire Marshal of a major County Fire Department.

The conclusions and recommendations are summarized as follows. They are found in detail within the report:

1. The Rural Fire Protection District is not adequately equipped or staffed currently to provide an adequate level of emergency response and fire and life safety to the proposed Jamul Indian Village. Automatic or mutual aid resources are limited and result in a greatly delayed response.
2. The Jamul Community Services Zone is at risk for a repeat of the 1970 Laguna Fire within the next ten years. This almost occurred with the Viejas Fire in early January 2001. Had that fire occurred in Fire Season, a major structural conflagration would have resulted.
3. The estimated number of total annual emergency responses within the Jamul Community Service Zone with the proposed Jamul Indian Village project is 2783.3 (7.6 calls per day). Without the proposed project, it is 974.2 calls in the year 2005 (2.6 per day). The net impact is 1809.6 calls per year to the Jamul Indian Village (4.9/day). This is a significant increase in call volume.
4. The current Fire Station 66 should be moved from its existing site. The existing site is too small (.82 acres) and would be too close to the Casino for response purposes. In addition, the apparatus currently has to exit onto Highway 94 which is extremely dangerous. The increase in traffic generated by the Jamul Indian Village will increase the risk of accident, and will potentially delay response from the station due to traffic congestion.
5. Compliance with the minimum requirements of the Fire and Building Codes does not result in providing adequate offsets to the existing level of service.

The Jamul Indian Village project presents potential impacts to the Rural Fire Protection District even if the Village does not contract fire protection and emergency response from the District. Such impacts include:

- Increased traffic accidents and other vehicle related emergencies on Highway 94. Project generates 10,285 additional daily vehicle trips. The current daily traffic

trip count on Highway 94 is 16,000. Emergencies are estimated to increase from 61 per year to 99.

- Vegetation fires caused by juveniles and careless smokers.
- Possible domestic violence related to gambling and causing EMS calls.
- Possible burglaries by gamblers to obtain money, with arson set fires to cover up the crime.
- Possible arson/spite fire or violence from disgruntled gamblers.
- Larger fires and more severe EMS outcomes caused by delayed response due to heavy traffic.
- Reduced availability of Automatic and Mutual Aid companies to the Jamul Community Service Zone, if they are committed to incidents at the Jamul Indian Village.
- Political pressure on the Fire District to provide Automatic or Mutual Aid free of charge to the village based upon the local revenue and jobs generated by the Jamul Indian Village.
- Unavailability of private ambulance response into the Community Service Zone due to commitment to incidents at the Jamul Indian Village.
- The large increase in traffic generated by this project will impact emergency response from off site fire stations and other emergency vehicles.

Optimum System:

The optimum system for protection of the Jamul Indian Village if the Village contracts to the Rural Fire Protection District is as follows:

1. Fire station on site at Jamul Indian Village, as described in this study.
2. Full time staffed four person Medic Quint (2,000 GPM. 75' to 105' aerial).
3. Unstaffed structural engine company for cross staffing and for staffing by reserves/volunteers.
4. ALS ambulance with full time staffing of 2.
5. Mini pumper for use in parking garage.
6. Built in structural protection as described in this study.
7. Fire District offices co-located at on site Jamul Indian Village Casino Fire Station.
8. Second fire station in general area of Skyline and Jamul Vista. One full time staffed 4 person Medic Engine and a full time staffed 2 person ALS ambulance.
9. USAR Heavy apparatus at Skyline Station.
10. Full time Fire Chief. (current).
11. Full time Fire Marshal (current).
12. Full time mechanic with mobile service vehicle.
13. Full time Training officer at Chief Officer rank.
14. Vehicle for Training officer.
15. Contractual plan checker/inspector for Jamul Indian Village Project.
16. Full time civilian plan checker/inspector.
17. Vehicle for inspector.
18. Full time district clerk (current).
19. Full time secretary (currently part time).
20. Daily fire inspections and occupant load checks by Firefighters.

21. AED's located at Casino and Hotel.
22. Continue automatic and mutual aid agreements.
23. Continue reserve and volunteer program.
24. Stations 63, 64 and 77 continue as is.
25. Small equipment as listed in this study.
26. Adequate on going funding of the Fire Department Training and Fire Prevention programs, to address occupancies such as the Jamul Indian Village.

**If the Jamul Indian Village does not agree to include the built in tactical upgrades and infrastructure recommended in Section 6 of this report, then the Fire Station at the Jamul Indian Village will need an additional fully staffed four person Medic Engine Company, due to increased and unmitigated risk.**

**Fire Department needs if the Jamul Indian Village does not contract with the Rural Fire Protection District:**

The Fire Protection District is in need of the following additions even if the Jamul Indian Village does not contract with the Rural Fire Protection District:

1. Same administrative staff minus contract plan checker.
2. Relocate Fire Station 66 off of the reservation, in the same general area and south of Highway 94.
3. Construct and staff a new residential style station at Skyline and Jamul Vista. Staff a four person Medic Engine and a two-person ALS ambulance with fully paid personnel at all times.
4. Future fire station in the Proctor Valley dependent upon growth (developer funded).

**Estimated Fair Share Costs:**

The estimated fair share costs for the optimum delivery system are listed in detail in Section 10 of this report. The fair share costs for the Jamul Indian Village should be limited to the initial and ongoing costs of the station, apparatus and personnel recommended for the Jamul Indian Village. The Rural Fire Protection District should fund the second needed fire station, as that station and crew is needed now notwithstanding the existence of the Jamul Indian Village Project. However, if it is found in the future that a significant amount of incidents at the Jamul Indian Village require response from the second station as well as from the station ant the Jamul Indian Village, then the Project should be charged for those responses, or should pay a fair share cost of that station.

Initial total fair chare costs for Jamul Indian Village: (fire station is \$2.8 million of this amount). (option; if Station is financed and all equipment leased;	\$5,070,398.00
Annual ongoing contract costs:	\$1,134,346.00
Initial fair share costs for the Rural Fire Protection District: (estimated initial costs if station financed and equipment leased	\$2,771,414.00
Ongoing annual costs to Rural Fire Protection District:	\$1,087,547.00

Summary:

The Jamul Indian Village project is feasible and the Rural Fire Protection District can provide a reasonable level of initial response to most credible incidents, and reduce the impact of Fire and EMS incidents to an acceptable level, if the recommendations in this report are followed. The relocation of Fire Station 66 to Melody Road provides a better location for response than the current location.

The Rural Fire Protection District must begin immediately to implement proactive prevention efforts to prevent another Laguna Fire. This will require the addition of the recommended staffing and the recommended fire station and apparatus, as well as a community wide Vegetation Management Plan and program and intensified requirements for new construction.

The Rural Fire Protection District should pursue the legal avenues to assume the operation of the ALS ambulance transport system within the Jamul Community Services Zone, to assure ongoing reliability of the needed level of service. The ambulance staff should be Rural Fire Protection District employees.

The recommendations and estimated costs set forth in this report are conceptual and are subject to negotiation and revision by a cooperative effort of the Rural Fire Protection District and the Jamul Indian Village.

**Section 1. Introduction:**

The purpose of this study is to perform a Fire and Emergency Medical Services (EMS) Risk Assessment of the Jamul Community Services Zone, and the proposed Jamul Indian Village project. The purpose is also to determine the additional needs of the Rural Fire Protection District (RFPD) in the Jamul Community Services Zone with and without the presence of the proposed Jamul Indian Village Casino and Hotel. This study was conducted by Jim Hunt of Hunt Research Corporation (HRC). HRC is the oldest community fire protection consulting and planning firm of its type in California. Jim Hunt has 37 years experience in the Southern California Fire Service. Jim Served on several major Fire Agencies and attained the rank of Battalion Chief. He also served as Assistant Fire Marshal of a major County Fire Department.

In order to arrive at the recommendations in this report, the following tasks were completed:

1. Community Fire and EMS risk assessment.
2. Analysis of historical incident data.
3. Review of current station locations and staffing.
4. Review of the current RFPD organizational capabilities.
5. Review of the proposed project and inspection of the site.
6. Estimate incident projections for the next five years.
7. Develop Goals and Objectives for the Jamul Community Services Zone.
8. Determine the current and needed Levels of Service.
9. Make recommendations for built in tactical enhancements for the Jamul Indian Village.
10. Identify the needs for the RFPD for the Community Service Zone and the Jamul Indian Village project.
11. Identify the needs for the RFPD for the Community Services Zone without the provision of contract protection to the Jamul Indian Village.
12. Identify the optimum delivery system.
13. Estimate the fair share costs to be borne by the Jamul Indian Village project.

The results of the above listed tasks are set forth in this report. This report contains many recommendations, which are subject to the approval of the Fire District. Many of the recommendations are conceptual in nature as there are no detailed plans for the Jamul Indian Village at this time. The report contains estimated costs. However, this is not a fiscal analysis. Such projected costs are subject to review and confirmation or revision by the Fire District and the Board of Directors.

It is hoped that this report will serve as a catalyst and guideline towards reaching mutual agreement between the RFPD and the Jamul Indian Village for contract emergency services. The RFPD is capable of providing such services if the recommendations and delivery systems identified in this report are satisfactorily implemented. It would be dysfunctional to emergency services in the Jamul Community services zone for the Jamul Indian Village to start it's own fire department. The trend in community fire protection is towards more regional service, at a county or district level, rather than creating more local, redundant, fire agencies and bureaucracies.

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**Section 2. Fire and EMS Risk Assessment: Jamul Community Service Zone:**

The first part of this section is a risk assessment of the current Jamul Community Service Zone without the addition of the proposed Jamul Indian Village Casino and Hotel. The second part is a Risk Assessment of the proposed Casino and Hotel.

**A. Current Community Service Zone:**

The Jamul Community Service zone is comprised of approximately 125 square miles and 80,000 acres of which 22,581 acres (17%) are developed. 83% of the land is currently undeveloped. The current population is 10,867 persons living in 3,471 housing units. This equates to 3.1 persons per household. The average home is about 3,000 square feet. In addition, about 50 persons reside on the Jamul Indian reservation. There are approximately 16 houses on the reservation.

Most of the homes are newer, large upscale homes on 1 to 5 acres. They are home to many professionals and commuters to San Diego City.

The community appears to be a mostly clean bedroom community with no slum type areas. There is no "downtown" core area. Retail occupancies are scattered within Jamul. There is no significant industry. Only 6% of the developed acreage is commercial or industrial use.

Currently, the largest single structure is the Church of the Latter Day Saints, which is 15,300 square feet and one story in height. The highest needed fire flow is 3,339 GPM, per the RFPD. This flow is needed for the Church of the Latter Day Saints.

The community is exposed to the risk of a major Urban Wildland interface/intermix fire. There are 57,419 undeveloped acres. Many of these are on steep slopes and drainages. Most of the vegetation can be classified as Fuel Model 4, which mostly resembles chaparrals. This is the most dangerous type of vegetation. A major fire, the Laguna fire, burned through Jamul in 1970. 392 structures were lost, 100+ were damaged. There were 8 lives lost. The dollar loss was in the millions.

On December 19, 2000, an Urban Wildland Interface fire occurred at 1743 hours in Harbison Canyon. This fire destroyed nine structures and one trailer, damaged two other structures and one trailer and burned one acre. Twenty-three fire companies, seventy-eight firefighters and 5 chief officers were summoned utilizing RFPD forces, as well as automatic and mutual aid. It required up to 1 hour for all needed forces to arrive. The Fire Chief states that had this been a wind driven fire in fire season, 500 or more homes could have been destroyed.

On December 27, 2000, at 1315 hours, a vegetation fire occurred at Jamul Drive and Mexican Canyon. This fire threatened sixty homes. It required twenty plus engines, 60 firefighters and three chief officers. Again RFPD, Automatic and Mutual aid forces were required. Fifty Acres were burned.

On January 3, 2001 a major wildland fire occurred in the Rural Fire Protection District. This fire was called the Viejas Fire. It was apparently caused by a cigarette discarded by a motorist on Highway 8 near the Viejas Casino. The fire burned 10,353 acres in one day (625 acres per hour/ 10.4 acres per minute). Flame lengths reportedly reached 150'. The fire was driven by 65 MPH

winds. It destroyed eight homes, thirty-three out buildings and seventeen vehicles. Over 2,000 firefighters were assigned to the fire, from as far away as Prescott, Arizona. The total fire cost exceeded \$1 million.

Had this fire occurred in fire season, it would have been a repeat of the Laguna Fire of 1970. The fire would have probably become a structural conflagration destroying hundreds of homes.

A major UWI fire is likely to occur in the Jamul Community Service Zone in the next 10 to 20 years as vegetation ages and more people move into the Urban Wildland Interface. This fire could result in a major structural fire loss, and perhaps life loss.

The total number of emergency calls per year averages 640 calls. The Fire Chief reports that there has been a significant (33%) increase in calls since July 2000. Prior to that date, RFPD units were dispatched by CDF. This could indicate call screening and/or mistaken assignment of CDF engines to a RFPD incident.

#### Fires:

RFPD data indicates the average annual number of fires is 130. Of those, 24 are in structures and average 3,000 square feet per fire. Fifty-two fires are wildland fires and fifty-two involve other sources such as trash dumpsters, vehicles, etc. Fires represent 20% of all calls. This is consistent with national statistics. The number of actual fires is decreasing due to the fire prevention and public education efforts of the Fire Service. This is especially true in upscale residential communities such as Jamul. Fire responses as a percent of the total responses have dropped percentage wise due to the increase in EMS calls.

The average annual fire loss is \$328,982. This is an average loss per fire of \$2,530. This is a low fire loss. The average annual life loss due to fire is zero. This is an excellent record.

#### Emergency Medical Services:

Seventy two percent of all calls are EMS. This mirrors national fire service statistics. The EMS call load for most Fire Departments is fifty-eight to eighty percent or more. For one comparison, 58.98% of all calls in the Rancho Cucamonga Fire District in San Bernardino County during 1999 were EMS. Sixty Three percent were ALS. In Jamul, the number of EMS calls equaled seventy two percent of all calls. The total number of annual EMS calls averages 462. Ninety seven percent of these are categorized as Advanced Life Support (paramedic) level calls. The RFPD states that this high number of ALS calls reflects how calls are classified due to the exclusive operating area and ambulance contract. Calls are classified as BLS only when ALS units are not available. If, in the future, a triage/call screening system is implemented within the Heartland dispatch center, and/or if the RFPD provided ALS ambulance service using RFPD personnel and apparatus, the number of actual ALS calls may be reduced to about 60% of all EMS calls.

Many EMS calls in any jurisdiction must be initially considered to be ALS until the on scene evaluation is completed. More in-depth analysis of the EMS data by the Fire District may result in a reduction in the number of actual ALS calls.



Risk Assessment: Community Service Zone without Jamul Indian Village Project:

The primary structural fire and life loss risk is the two-story house. This is due to the size of such structures, and the vertical channels through which an undetected fire can spread, especially at night. More fatalities occur in two story homes than one-story homes due to undetected fire, delayed alarms, and the potential of being overcome by smoke and/or trapped by fire. The average size of a home in Jamul is estimated to be about 3,000 square feet. The current fire service delivery system (level of service) in the Jamul Community Service Zone results in the ability to control or extinguish a 540 Square foot fire within a one or two story unsprinklered structure, when the need to accomplish all critical fireground tasks with limited staffing is considered. Thus, there is an 82% deficiency in the level of service of the on scene forces due to lack of staffing.

The following table illustrates the Critical tasks necessary at a 540 square foot residential fire on the first or second story.

Minimum Standards of Cover for 540 square feet  
SFD Residential or Small Commercial Fire  
Based on Necessary Fireground Tasks

Task	Number of Firefighters	Company Assigned	GPM
Attack Line	2	1st Engine	180
Attack Line	2	2 <sup>nd</sup> Engine	180
Search & Rescue	2	Truck	
Ventilation/Salvage	2	Truck	
Back-Up Line/Rapid Intervention	2	3rd Engine	
Pump Operator	1		
Water Supply	1	4 <sup>th</sup> Engine	
Utilities Support	1	Rescue or Truck	
Command	1	Chief Officer	
Safety	1	Rescue or Truck	
Total Personnel	15		360
			24 GPM per firefighter

Source: Commission on Fire Accreditation International and Hunt Research Corporation. Time required for 15 Firefighters to arrive on scene is 17.6 minutes.

Wildland Fire:

As recently witnessed, the highest fire risk to the Jamul Community Service Zone is the wildland fire. The Jamul Community Service Zone is classified as a high fire risk area by the State of California. Eighty-three percent of all land within the district is undeveloped. As stated earlier, the vegetation is predominately a Fuel Model 4 (mixed chaparrals) which is the most dangerous type of vegetation. The tonnage appears to be about 12-15 tons per acre. This type of vegetation is responsible for most of the major wildland related fire losses in California. Much of the vegetation is located on steep slopes and drainages. Winds within the Jamul area during fire season can reach 75 MPH. In a wind driven fire, flame lengths can reach 100' or more. The rate of spread in such fuel beds can reach 30 MPH. Burning embers and flying debris can spot miles ahead of the main fire and start additional fires. There is a proliferation of ornamental shrubbery too close to many structures in Jamul. The spotting will ignite this shrubbery and can spread fire to the structures. A structural conflagration can ensue. After such a major fire, flooding can occur in the rainy season due to loss of watershed.

The Fire Department forces in the Community Service Zone can attack and control a 5-acre fire without outside or mutual aid forces. They can protect four structures within a reasonable period of time.

The response time of outside forces is about 30 minutes or more. During fire season, outside forces may not be available or may be greatly delayed due to other fires. This occurred in the 1970 fire. Many structures can be lost prior to arrival of outside forces.

If the winds are below 35 MPH, air attack forces from the CDF can be deployed on the fire, if they are available.

The overall community structure fire risk can be classified as moderate probability/low consequence (loss of one structure). The wildland fire risk can be classified as Moderate Probability/High consequence (potential loss of many structures). A major Urban Wildland interface fire of the size of the 1970 Laguna fire has a high probability of occurring in the Jamul Community Service Zone in the next ten years. It almost occurred in January 2001.

Emergency Medical Services:

Most emergency calls are for EMS. The Fire District classifies most of these as ALS. As the population ages, the actual number of verified ALS calls will increase. The upscale nature of the community, and the present and future socio economic level, will result in less violence or life style caused EMS calls. In addition, as observed at other similar facilities, many of the customers to the Casino, especially the bingo parlor, may tend to be older, in ill health, or may tend to have life styles which impair their health, such as abuse of drugs, alcohol and heavy smoking.

The current EMS incident level is manageable by a 3 person Engine Company and a Medic ambulance. As incidents increase, even without the Casino and hotel, multiple queuing of calls (2 calls at the same time) may occur. This will significantly impact timely response. In fact, an ALS transport call typically requires about a 2-hour time frame. Thus, the ambulance and personnel will be gone out of the Zone for about 2 hours.

In order to assure the presence of adequate ambulance service in Jamul, and to assure that the desired level of reliability and service is maintained at all times, it is recommended that the Rural Fire Protection District pursue legal avenues to take over the ambulance transport service in the Jamul Community Services District. This would result in local control, Seamless training, and an increase of firefighter staffing on emergencies.

B. Risk Assessment for Jamul Indian Village Hotel and Casino:

1. Estimated annual incident demand created by this project:

The estimated annual incident demand for this project has been determined by HRC using the following information:

- A. Occupant load as determined by Uniform Building Code Table 10-A, based upon the proposed uses and square footage for each use as set forth in Table 2-2 of the Environmental Assessment dated 9-2000.
- B. Annual estimated emergency incidents per 1,000 population as utilized by Fire Agencies in San Diego County. (82 per 1000)
- C. Jamul service area data re Incidents. 73% are EMS; 96% of those are ALS.
- D. Additional incidents as estimated by HRC.

Estimated potential maximum legal occupant load of the entire proposed project is 13,757. The occupant load of the casino is 8345. The hotel occupant load is 571. The restaurant/lounge occupant load is 2,886. The remainder is spread amongst the other occupancies. (Estimated maximum allowable occupant loads were calculated using UBC Table 10-a; based upon uses identified in Table 2-2 of Environmental Assessment.) This assumes that the facility will be built to UBC standards, as it should be notwithstanding sovereign nation status. Total estimated square footage is 379,200. Number of customers per day per traffic study is 9001.

Annual number of estimated incidents using San Diego County Fire Agency factor of 82 per 1,000 population = 1,123 per year. 83% (932) will probably be EMS related calls. 466 of these (50%) may be ALS calls.

- One car or bus fire on site per day: 365/year
- One trash fire in dumpster or trash cans every 2 days (182/year)
- One vegetation fire per week (52/year)
- One vehicle related emergency on Highway 94 every 10 days (38/year)

RECAP:

Total estimated annual calls for the proposed project: 1,809.6 (4.9 per day). For comparison, Viejas Casino generates about 2.2 calls per day. 83% are medical aid. 25%

of these are ALS. Sycuan Casino generates 2.8 calls per day. 78% are EMS. 50% of these are ALS. (data provided by Sycuan FD personnel)

Current number of total annual calls in Jamul Community Service Zone: 640 (1.7/day). The total number of calls in the zone will increase to 2783.8 calls per year; 7.6/day, if this project is built. This would be an increase of 5.9 calls per day in 2005.

The proposed project may generate almost 3 times as many calls as currently generated in this Zone.

2. Potential Types of Fire Incidents:

The potential types of FIRE incidents, which may occur at this project, include:

Casino:

1. Trash fires behind and between slot machines.
2. Trash fires in trash cans and dumpsters.
3. Electrical fires in gaming equipment, lighting, signs, etc.
4. Trash fires in elevator and escalator equipment pits.
5. Trash fires in restrooms.
6. Grease fire in kitchen and duct system.
7. Arson/suspicious fire.
8. HVAC system including equipment on roof.
9. Halogen lighting too close to combustibles (convention/display areas).
10. Fire in trash chute/ compactors.

Hotel:

1. Bedding/furniture ignited by smoking materials.
2. Arson fires.
3. Fire in linen storage room/laundry.
4. Frayed electrical cords behind beds.
5. HVAC system.
6. Fire in trash chutes/compactors.

Parking Garage:

1. Vehicle engine fire.
2. Cigarette in upholstery in vehicle.
3. Trash fire.

Approaches and Temporary Vehicle Unloading/ Bus Parking:

1. Vehicle engine fires/electrical fires.

**Warehouse:**

1. Fire caused by smoking.
2. Electrical fire.
3. Flammable/combustible liquid spill/fire.
4. Chemical reaction from spilled chemical.
5. Combustibles too close to heating equipment.

**Vegetation Areas; Including Along Roads and Highway:**

1. Matches and discarded smoking materials.
2. Arson/ suspicious.
3. Hot muffler/tailpipe on vehicle.

**Single Family Housing:**

1. Trash fires caused by smoking materials/barbeque coals.
2. Careless smoking (beds, upholstery).
3. Heating equipment/electrical systems.

C. **Impacts Upon the Rural Fire Protection District if Jamul Indian Village is Built But Does Not Contract to Rural Fire Protection District:**

- Increased traffic accidents and vehicle related emergencies. Project generates 10,285 additional daily vehicle trips. Current daily trip count is 16,000. Estimated number of traffic related emergencies are estimated to increase from 61 to 99 per year.
- Vegetation fires caused by juveniles and careless smokers .
- Possible domestic violence related to gambling and causing EMS calls.
- Possible burglaries by gamblers to obtain money, with arson set fires to cover up the crime.
- Possible arson/spite fire or violence from disgruntled gamblers.
- Larger fires and more severe EMS outcomes caused by delayed response due to heavy traffic.
- Reduced availability of Automatic and Mutual Aid companies to the Jamul Community Service Zone, if they are committed to incidents at the Jamul Indian Village.
- Political pressure on the Fire District to provide automatic or mutual aid free of charge to the village based upon the local revenue and jobs generated by the Jamul Indian Village.
- Unavailability of private ambulance response into the Community Service Zone due to commitment to incidents at the Jamul Indian Village.
- The large increase in traffic generated by this project may significantly impact emergency response from off site fire stations and other emergency vehicles.

**SCENARIOS:**

For purposes of estimating the number of firefighters needed at an incident, four scenarios have been developed. The critical fireground tasks, which must be performed by firefighters, have been listed for each incident. Certain tasks need to begin within the first 5 minutes of the fire, to prevent flashover and to rescue occupants.

**Scenario #1:**

Scenario #1 involves a trash fire occurring on the first floor of the casino, in a void space behind slot machines. Fire is spreading between machines and has ignited carpeting and plastics on gaming equipment. The fire is very smoky. The Casino is fully occupied on a Saturday night (maximum allowable occupant load calculated at 8,345 occupants). Two sprinkler heads have activated and are controlling spread but not reaching seat of the fire. Fire has involved 1,000 square feet. Some smoke is rising into the second floor via vertical openings and HVAC.

Refer to the table below:

**Critical Tasking**

Task	Number of Firefighters Needed	Fireflow (GPM) Being Delivered	Number of Engine/Truck Companies
Incident Command	5 (I.C, Operations, Plans, Logistics, Safety)	None	None
Sprinkler supply	1 Firefighter	EST. 40 gpm	1 Engine
Hand held hose lines (2)	4 Firefighters	360 GPM	1 Engine
Rapid Intervention team	4 Firefighters	None	1 Engine
Search and EVAC	10 Firefighters	None	3 Engine Co
Ventilation/smoke removal	4 Firefighters	None	1 Truck Co
EMS	4 Firefighters	None	1 Squad/ 1 Ambulance
Utilities	2 Firefighters	None	1 Engine Co
Salvage/damage control	4 Firefighters	None	1 Engine Co
Rehab/relief personnel	4 Firefighters	None	1 Engine Co
Logistics Section	2 Firefighters	None	1 Engine Co
<b>Total</b>	<b>44</b>	<b>400 GPM/9 per Firefighter</b>	<b>10 Engines, 1 Squad, 1 Truck, 1 Ambulance (13). 3.3 FF per vehicle av.</b>

Estimated elapsed time for 44 Firefighters to arrive on scene: 55 to 60 minutes. An acceptable time frame for a timely operation is at least 4 firefighters arriving within 5 minutes of receipt alarm, 12 firefighters arriving within 8 minutes from receipt of alarm, and the remainder within approximately 16 minutes.

**Scenario #2: Fire in Guestroom in Hotel, on 4<sup>th</sup> floor**

Fire in bedding materials due to smoking in bed while intoxicated. Occupant in room is a fatality. Smoke has entered hallway and is migrating to 5<sup>th</sup> floor, via vertical openings and HVAC. Sprinkler head has activated. Fire involves 200 square feet.

Task	Number of Firefighters Needed	Fireflow Delivered	Number of Engine/ Truck Companies
Incident Command Staff	4 (I.C, Operations, Division, Plans)	None	None
Sprinkler supply	1 Firefighter	20 GPM	1 Engine
Hand held hose line	2 Firefighters	180 GPM	1 Engine
RIT team	2 Firefighters	None	Same engine as above
Search and rescue	12 Firefighters (4 per floor)	None	4 Engines
Ventilation	4 Firefighters	None	1 Truck Co.
Rehab/relief	4 Firefighters	None	1 Engine Co
Utility control	2 Firefighters	None	1 Squad
Logistics (high rise)	4 Firefighters	None	1 Truck Co.
Salvage/damage control	4 Firefighters	None	1 Truck Co.
EMS	4 Firefighters	None	1 Squad/1 Ambulance
Totals	53 Firefighters	200 GPM (3.7 per firefighter)	7 Engines, 3 Trucks, 2 Squads, 1 Ambulance (average 4 firefighters per co)

Time required for 53 firefighters to arrive on scene: 60 to 70 minutes. An acceptable time frame is 5 minutes from receipt of alarm for 4 firefighters, 8 minutes from receipt for a total of 12 firefighters, and approximately 16 minutes from receipt for the remainder.

**Scenario #3: Parking Garage:**

This scenario involves an SUV vehicle engine compartment fire on the 4<sup>th</sup> level. One sprinkler head has activated. The immediate area has heavy smoke.

Task	Number of Firefighters	Fireflow Delivered	Number of Engines/ Trucks
Incident Command	2 (I.C and Operations)	None	None
Hand Held hose line	2 Firefighters	50 GPM	1 Mini Pumper
RIT	Not needed		
Sprinkler supply	1 Firefighter	20 GPM	1 Engine
Ventilation	2 Firefighters	None	Same engine as above
Search and EVAC	4 Firefighters	None	1 Truck Co
Utility control	2 Firefighters	None	1 Engine
<b>Total</b>	<b>13 Firefighters</b>	<b>70 GPM (5.3 per firefighter)</b>	<b>2 Engines, 1 Mini Pumper, 1 Truck (av. 3.2 firefighter per co).</b>

Time required for 13 RFPD firefighters to arrive on scene: 17.6 minutes. An acceptable level of response would include four firefighters arriving within 5 minutes of receipt of alarm.

**Scenario #4: Warehouse Fire:**

This scenario involves an undetected fire in the 20,000 square foot warehouse at 10 PM on a Sunday night. The fire has involved an area of 500 Square feet before activating 4 sprinkler heads. The sprinklers are controlling the fire but not extinguishing it due to obstructions. The building is filled with smoke.

Task	Number of Firefighters	Fireflow Delivered	Number of Engine/ Truck Companies
Incident Command	2 Firefighters (IC/Ops)	None	None
One Hand Held Hose Line	2 Firefighters	180 GPM	1 Engine Co
Sprinkler Supply	1 Firefighter	100 GPM	1 Engine Co
RIT Team	2 Firefighters	None	Same Co. As Above
Ventilation	2 Firefighters	None	1 Truck Co
Search And Rescue	2 Firefighters	None	Same Co. As Above
Rehab And Relief	2 Firefighters	None	1 Engine Co/ Squad/ Or Ambulance
Utilities	2 Firefighters	None	1 Engine
<b>Total</b>	<b>15 Firefighters</b>	<b>280 GPM (18.6 Per Firefighter)</b>	<b>4 Engines, 1 Truck (Av. 3 Firefighters Per Co)</b>



Time required for 15 firefighters to arrive on scene: 17.6 minutes. An acceptable level of response would include 4 firefighters arriving within 5 minutes of receipt of alarm.

The estimated personnel needed for each task are minimums. In fact, more personnel may be needed, and more tasks necessitated, based upon the actual conditions. The number of Engine and Truck Companies required are based upon the staffing per company. Generally, Engines are staffed with 3 firefighters and Ladder trucks have 4 firefighters. The San Miguel Truck Company has 3 assigned. The Sycuan Truck Co has 4 firefighters.

The current RFPD delivery system (level of service) cannot provide adequate and timely protection to the Jamul Indian Village Casino or Hotel.

EMS Risk:

The Jamul Indian Village Casino and Hotel may generate about 2.5 EMS calls per day. 50% or more (1.2) may be ALS calls requiring transportation. Viejas response data indicates 25% are ALS. Sycuan data indicates 50% are ALS. However, there is no hotel at either location. As stated earlier, many of the customers are elderly and/or may be in poor health. Many may be handicapped. Viejas FD personnel indicated the potential for the ongoing presence of abusers of drugs or alcohol, due to the gambling attraction.

The current Jamul Service Delivery system (level of service) cannot provide adequate EMS response to this facility when considering the cumulative effect of other calls in the Service Zone, and the potential for multiple queuing. The current staffing cannot provide adequate EMS response to a multiple victim incident, such as a Bus accident, major fire, shooting, etc.

The total number of EMS calls is estimated to be 5 per day in the zone including the casino/hotel. If most were ALS transports, the ambulance and crew could be gone out of the zone for 8 hours per day (1/3 of the time). The total number of daily calls (all types) in the service zone, including the casino/hotel is estimated to be 7.6 in the year 2005. This may result in multiple queuing and delayed response.

Summary:

The risk assessment demonstrates that the current delivery system cannot provide an adequate level of OSHA compliant service to the Community Service zone or the Casino/Hotel project. Significant, adequate, offsetting mitigations should be imposed.

**Section 3. Five Year Incident Projections with and without the Jamul Indian Village Casino/Hotel:**

This five-year estimated projection of emergency incident loads is based upon incident information from RFPD. The SANDAG population estimate for year 2005 is 15912. However, current projects, which have been submitted to the RFPD, reflect a total of 1423 homes. Using the SANDAG population per household number of 3.26, this would equal an increase of 4638 persons in the next year or so. Therefore, the SANDAG numbers may underestimate future growth. It may not be unreasonable to estimate that the population of the service zone will double to 21734 by 2005, subject to the economy and real estate market. However, for purposes of making incident projections, the SANDAG data will be used.

The first Table estimates incidents without the Jamul Indian Village Casino/Hotel. Dividing the number of calls derives the per capita call generation factor by the population. This provides a linear projection. Actual increases in EMS calls may be greater due to future aging of the population. However, this impact is offset somewhat as this population group generates less violent type or life style related EMS incidents and generates less fires. They tend to consume less Fire Department services.

**Current and Projected Incidents in Jamul Service Zone for 2,000 and 2,005**  
**W/O Jamul Indian Village Project**

Current annual incidents based on 3-year average* Population 10,867. (2,000)	Per capita call generation factor	Annual calls (3 yr average)	Projected annual calls; yr 2005 (estimated based upon pop. of 15,912)	Per day; estimated
1. Total emergency calls	.058	640	900.4	2.4
2. Fires (total)	.011	130	175.	.47
3. Structural fires	.002	24	31.8	.08
4. Wildland fires	.004	52	63.6	.17
5. Other fires	.004	52	63.6	.17
6. ALS calls	.041	452	652.3	1.78
7. BLS calls	.0009	10	14.3	.03
8. Public assist	.003	40	47.7	.13
9. Hazardous Materials	.0007	8	11.1	.03

*\* Per the Fire Chief, the number of reported incidents have increased 33% since July 2000. Prior to that date RFPD was dispatched by CDF. This increase may indicate previous call screening, triage, reporting deficiencies or mistaken dispatching of CDF resources to RFPD incidents, rather than a sudden increase of 33%.*

Excluding the Casino and Hotel project, it is estimated that Jamul Community Service Zone emergency incidents will increase by 41% over the next 5 years. Population will increase by approx. 45%.

1. Five-year projection of emergency incident loads generated by the Jamul Indian Village Casino/ Hotel.

The Table on this page estimates future incidents for the Casino/Hotel utilizing the same call generation factors, the maximum allowable occupant load of the facilities, as well as standard criteria utilized by San Diego County Fire agencies. That criteria states that 82 calls are generated per year for each 1000 population (structure fires and EMS). The data also utilizes actual data from Casino/ Hotel fires, estimates by the consultant based upon experience, and data from the Sycuan and Viejas Casinos. The Casino Hotel population is based upon the maximum allowable occupant load (per the UBC) for each component as Described in Table 2.2 of the Environmental Assessment. That estimate is 13,757. The buildings are reportedly being designed to accommodate that occupant load.

The Table on this page also includes the total estimated cumulative number of annual and daily calls in the Service Zone in 2005 if the Casino Hotel is built. The calls to the Casino Hotel will probably remain about the same from year to year. This assumes no increase in the size of the facility. The proliferation of Casinos may reduce the number of patrons at each Casino due to competition. This will offset any projected increases unless the facility expands. The incidents in the remainder of the Service zone will increase.

**Total Estimated Annual Incidents in the Jamul Community Service Zone  
With and Without the Jamul Indian Village Project**

Type of incident occurring	Annual est. call volume; Jamul Indian Village; 2000/2005	Daily call volume; Jamul Indian village; 2000/2005 (assumes incident totals stay about the same over 5 years)	Total projected annual volume/ daily volume for 2005; Jamul Community Service Zone excluding Jamul Indian Village	Cumulative annual/ daily totals; 2005: Jamul Community Service Zone including Jamul Indian Village
<b>Total</b>	<b>1809.6</b>	<b>4.9</b>	<b>974.2/2.6</b>	<b>2783.8/7.6</b>
Baseline; 82 per 1000; Structural Fire/EMS	1123	3.1	31.8/.08; structural fires (actual current generation factor used)	1154.8/ 3.16
EMS Total (83% of baseline)	932	2.5	666.6/1.82 (actual current generation factor used)	1598.6/4.37
ALS (50% of total EMS)	466	1.27	333.3/.91	799.3/2.18
BLS (50% of total EMS)	466	1.27	333.3/.91	799.3/2.18
Car/Bus fire (est.)	365	1	Included in "other"	365/1
Trash fires/other (est.)	182	.5	63/.17	245/67
Vegetation	52	.14	63/.17	115/31
Hwy. 94 Traffic Emergency	38	.1	91	129/35
Hazardous Materials (.0007 factor)	9.6	.026	11.1/.03	20.7/.05
Public Assist (.003 factor)	41	.11	47.7/.13	88.7/.24

Summary:

Summary:

The total estimated annual call volume of 2783 is a high call volume for a Fire Department the size of RFPD. 7.6 calls per day is a heavy call volume and will result in multiple queued calls. The Insurance Services Office considers recommending a second Engine company when annual call volumes reach 2500. The cumulative call volume for the Service Zone with the Jamul Indian Village project results in the need for two fully staffed fire companies and two ALS ambulances due to the large call volume and response district. The call volume for the Zone without the Casino Hotel results in the need for one fully staffed Engine Company and one staffed ALS ambulance. Fully staffed means four fully paid Firefighters on duty at all times. It must also be realized that as call volumes increase, especially EMS calls, it becomes more difficult to obtain reliable volunteers. The Fire Chief states that there might be the possibility that a future strengthened reserve firefighter program may draw more local citizens to become Reserve firefighters. However, this future possibility cannot be relied upon.

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**Section 4: Delivery System Selection Criteria**

The following Goals and Objectives, Levels of Service and Standards of Coverage form the basis for determining the needed Fire Service resources for the Jamul Community Service Zone, including the Jamul Indian Village Casino and Hotel project. They were created by Hunt Research Corporation for review and approval of the Rural Fire Protection District.

The Goals and Objectives, levels of service and standards of coverage are based upon nationally accepted good practice national consensus standards such as Insurance Services Office (ISO), National Fire Protection Association (NFPA), California OSHA, International City and County Management Association (ICMA) and other tactical benchmarks utilized in the Fire Service.

**Category A: Structural Fire Operations**

***Goal A-1: Minimize the life loss, injury and property damage caused by structure fires***

**Objective A-1-a:**

Continue to require Fire Sprinkler systems in ALL structures. All sprinkler systems shall be remotely supervised to an approved, 24-hour answering point. In addition, require remotely supervised Smoke detection in high risk occupancies and occupancies over 1 story in height, or over 12,000 square feet.

**Objective A-1-b:**

Reduce needed Fire flow requirements to 2500 GPM for 2 hours duration, after Sprinkler credits, by compliance with the Uniform Fire Code Appendix 111-A, in order to stay within potential water supplies and within ISO maximum flows allowed for two Engine companies.

**Objective A-1-c:**

Require that any systems supplied by Fire Pumps have at least two redundant pumps in service; one of which is a diesel.

**Objective A-1-d:**

Require that no structure have an undivided floor area exceeding 40,000 square feet without the installation of 4-hour firewalls or other equivalent, offsetting, fire protection features.

**Objective A-1-e:**

Control types of construction to prohibit any wood roofs or combustible exterior construction features.

**Objective A-1-f:**

Control types, quantities and configurations of all vegetation, including trees, in the service zone, to minimize the potential for spread of a wildland fire to buildings or to landscaping on streets.

**Objective A-1-g:**

Require any structures 55' or higher from, a 26' wide road at grade accessible by a Fire truck to any and all sides of the structure, to comply with County and State High Rise requirements.

**Objective A-1-h:**

Provide on site Fire Department access roads for all buildings. Such roads to encircle all buildings within 40' of such buildings. Roads to be 26' wide unobstructed to allow operations of an Aerial Ladder truck, and shall be posted as a Fire Lane. Provide locations for the spotting of a ladder truck where required by the Fire Department.

**Objective A-1-i:**

A 4 person Paramedic Engine company, staffed with full time, paid, personnel and equipped with an Aerial stream device (Quint), shall be able to arrive on scene within 5 minutes of receipt of call at 911 dispatch center, for 90% of all calls. Dispatch center time to be 1 minute, turnout time in Fire Station 1.5 minutes, and driving time 3 minutes. Distance to not exceed 1.5 road miles to 90% of all calls. Such response to the proposed Casino/ Hotel shall be from an on site station to avoid traffic congestion and resultant delays.

**Objective A-1-j:**

Provide adequate response to all structural fires in the service zone which allows for size up, Incident Command, search and rescue, confined space entry, augmentation of Sprinkler and other Fire suppression systems, smoke management operation, and application of 180 GPM through one handline inside of a structure while providing the required RIT team. Provide 8 Firefighters (2 Engine Companies; one of which is a Quint) on the initial response within 8 minutes of receipt of a call at 911 Dispatch center, for 90% of all calls. Response of the second Engine Company can be from a station within 5 miles, whether or not via automatic aid. In addition, a Chief Officer shall respond and be on scene within 15 minutes of dispatch.

**Objective A-1-k:**

Provide adequate ground and Aerial Ladder capability on scene within 8 minutes of receipt of alarm at 911 dispatch center, 90% of all calls, to reach the upper floors of a structure in the event stairs untenable due to fire and smoke or structural collapse, and to apply Fire water streams from an elevated position to multi story structures, or structures set back from streets, or otherwise inaccessible or obstructed by vehicles or storage, etc.

**Objective A-1-l:**

Provide Fire Department capability to pump 3,000 GPM at adequate pressures from two Fire Engines connected to the Fire Water supply system, into Fire Sprinkler or other Fire Suppression systems, Fire Department hose lines or large Fire department water streams. Water to be clean and potable and shall not pose a health hazard, or create a potential for failure of a Fire Protection system.

**Objective A-1-m:**

Provide Fire Department capability to apply 3,000 GPM through master water streams and Aerial ladder streams in the event the Fire Suppression systems fail to control the fire, or in the event of a Hazardous Materials release.

**Objective A-1-n:**

Provide Fire Department capability to control fires exposing or involving interior or exterior storage tanks or vessels and other on or off site exposures.

**Objective A-1-o:**

Provide the means for rapid and safe advancement of hoselines through large one story, congested structures, or to an upper floor or roof, and for provision of immediately accessible and operational hose line water supply connections.

**Objective A-1-p:**

Provide a means to rescue persons from upper floor windows or other elevated locations.

**Objective A-1-q:**

Provide built in means for smoke management and removal at any structure two stories or more in height or over 12,000 square foot in size. Such systems shall include smoke management systems and rooftop openable skylights, etc. to approval of the Fire District. This would include the Jamul Indian Village casino, hotel, and parking structure.

**Objective A-1-r:**

Provide Fire Command center at any large or multi story facility, for use of the Fire District during a fire. This would include the Jamul Indian Village Casino and Hotel.

**Objective A-1-s:**

Provide tactical enhancements as recommended in this analysis to assist the Fire Department in accomplishing critical tasks more efficiently.

**Objective A-1-t:**

Provide adequate and reliable fire flow and pressure to all points of all building and sites, at times of peak domestic demand in the area, through design and installation of a proper fire protection system.

**Objective A-1-u:**

Require compliance with all applicable National Fire Protection Association (NFPA) Standards, and Fire District Fire and Building Codes and related Standards, whichever are more stringent, for all new occupancies including the Jamul Indian Village Casino, Hotel and Parking structure. This should include, for one example applicable sections of NFPA 88-A; Parking Structures

**Objective A-1-v:**

Continue to assure adequate fire and life safety, and Hazardous Materials Code compliance, is provided by intensive review of all plans and specifications by the Fire Department prior to construction, by ongoing fire department inspection during construction, and by ongoing maintenance inspections.

**Objective A-1-w:**

Fire Department should pursue improvements, where possible, in the area automatic and mutual aid system to assure reliability of response from outside agencies when multiple queuing of events occurs in Jamul and surrounding areas. This should include investigation of the feasibility of functional consolidations involving local Fire Agencies (for example; Training, Fire Prevention, Fire investigation,

Apparatus purchasing and maintenance).

Such reliability of response should also include provisions to maintain on duty staffing of at least 8 Qualified Firefighters plus two Paramedic and EMT ambulance crews at all times in the Jamul Community Service Zone, not including any Automatic or Mutual aid Companies.

Objective A-1-x:

Regulate all buildings so that there are an adequate number of redundant exits and firefighter access doors from all floors and locations, so as to allow rapid evacuation at the same time as Fire Department hose line advancement is occurring in congested or multi story structures such as the Casino, Hotel, parking structure, etc.

Objective A-1-y:

Implement a partnership with any on site security personnel at large occupancies, such as the casino and hotel, to provide a 24-hour fire watch, fire prevention inspections, initial EMS response including use of AED, response to incipient fires, and undelayed notification of 911 for actual, confirmed emergencies.

**Category B: Emergency Medical Services**

*Goal B-1: Provide a high level of initial responder EMS service to the Jamul Community Service zone.*

Objective B-1-a:

Implement a program to educate the populace and workers on what is and is not an EMS emergency, in order to reduce unnecessary calls for service.

Objective B-1-b:

Encourage AMR and Grossmount Hospital to implement the "Clausen" type computer aided triage system currently available in the Heartland dispatch center.

Objective B-1-c:

Implement community safety programs to educate the local population and workers on the prevention of the most common types of EMS emergencies in the Specific Plan area.

*Goal B-2: Minimize life loss and further injury during medical emergencies.*

Objective B-2-a

Pursue a partnership between the Fire Department, Casino, Hotel, industry and insurance carriers to reimburse the Fire Department for pre hospital care, treat and release calls, etc.

Objective B-2-b

Provide community-training programs for all residents and workers on basic First aid and CPR.



**Objective B- 2-c:**

Formulate and encourage volunteer, on-site, emergency response teams for initial emergency service response at major facilities including during disasters.

**Objective B- 2-d:**

Arrive at 90% of all EMS calls in the service zone with a fully staffed (full time, paid) 4 person Medic Engine Company, or a 2-person Medic ambulance within 5 minutes of receipt of alarm in the dispatch center. This includes 1-minute dispatch center time, 1-minute turnout time and 3 minutes driving time. Availability shall not be dependent upon Automatic or Mutual Aid. Such response to the Casino / hotel shall be from an on site station to prevent delayed response due to traffic congestion.

**Objective B-2-e:**

Provide state of the art EMS equipment, including Automatic External Defibrillators, (AED) on all Fire Department response vehicles and at various industrial and commercial facilities, including the Casino and Hotel if personnel at the facilities are properly trained to operate such equipment.

**Objective B-2-f:**

Provide two 2 person Paramedic (ALS) ambulance vehicles for response to EMS emergencies, and potential subsequent transportation to Medical Facilities. Emergencies include those throughout the service zone, at the Casino and hotel, on roadways, etc, in order to keep the Engine Companies available for response to other emergencies in the service zone.

**Objective B-2-g:**

Provide one ALS transport ambulance on scene, to provide transport to Medical Facility, within 8 minutes of notification of such unit; 90% of all calls.

**Goal B-3:** *Provide an effective level of response to major EMS emergencies in the service zone.*

**Objective B-3-a**

Provide response of 8 Firefighters trained to level of EMT-D, plus one Chief Officer to the Jamul Community Service zone within 8 minutes of notification of 911, in the event of a major emergency, including major fire, plane crash, industrial incident, major highway incident including buses to Casino, etc., 90% of all calls.

**Objective B-3-b**

Pursue agreements with outside agencies and private ambulance providers for response of medic ambulances for transportation purposes, within 20 minutes, in the event a major emergency requires mass movement of critical care patients to Medical facilities as needed (Annex D)

**Category C: Hazardous Materials (HAZMAT)**

**Goal C-1:** *Reduce the number, risks and severity of HAZMAT incidents in the service zone*

**Objective C-1-a:**

Fire Department should encourage the use of alternative chemicals in place of Hazardous gases, at any facility, in order to reduce or eliminate the potential for an offsite vapor cloud, and/or the potential for a tanker truck accident resulting in a chemical release in the Zone.

**Objective C-1-b:**

Fire Department should Inspect and Inventory the Hazardous materials at all facilities on a regular basis.

**Objective C-1-c:**

Assure all areas where HAZMAT is stored or used are properly isolated from other areas and buildings; assure that HAZMAT fumes cannot be entrained into the HVAC systems, or travel offsite.

**Objective C-1-d:**

Fire Department should review all plans and MSDS sheets to assure the storage, use and dispensing of HAZMAT is in compliance with the Fire Code.

**Objective C-1-e:**

Assure Firefighters are adequately trained to the appropriate OSHA standards regarding Hazardous Materials emergencies.

**Objective C-1-f:**

Assure the Fire Department is properly equipped to handle initial response HAZMAT emergencies in the Zone.

**Objective C-1-g:**

Provide ample amounts of approved Firefighting foam concentrate and application devices, and large wheeled Dry Chemical units where necessary for use by Fire department during a major flammable or combustible liquid fire.

**Goal C-2:**     *Minimize damage to humans, environment and property caused by hazardous and/or flammable materials*

**Objective C-2-a:**

Locate any LPG, LOX, Nitrogen, Ammonia, Acid tanks, etc., away from buildings and offsite exposures, and provide proper built in protection on all tanks, in order to facilitate rapid shutdown of releases.

**Objective C-2-b:**

Provide Fire Department capability to flow 3,000 GPM, from Fire Apparatus connected to the public water supply, through master fire stream appliances and aerial streams to cool tanks and protect exposures.

**Objective C-2-c:**

Utilize and Enhance automatic aid, mutual aid and County wide resources to provide one properly equipped and trained Hazardous Materials response team on scene within 30 minutes of request for response. (Hazardous Incident Response Team, H.I.R.T.)

**Objective C-2-d:**

Review all proposed plans to assure mitigation of any potential offsite impacts due to fires, explosions, oil releases or Hazardous materials releases.

**Category D: Disaster Response**

**Goal D-1:** *Minimize life loss, injury and property loss due to a disaster*

**Objective D-1-a:**

Train the populace, including workers, as to their roles during disasters including earthquake.

**Objective D-1-b:**

Assure major occupancies have adequate, all risk, emergency response plans in place and that all personnel are trained on the plan. Conduct drills at least quarterly to exercise the plans.

**Objective D-1-c:**

Fire Department should review all construction plans for all facilities from the perspective of disaster response and mitigation. One example would be the provision of automatic shutoffs on storage tanks, vessels and piping systems in the event of earthquake.

**Objective D-1-d:**

Enhance the Urban Search and Rescue (USAR) capability of the local fire agencies through addition of proper equipment, apparatus, and enhanced training.

**Category E: Technical Rescue**

**Goal E-1:** *Provide effective and safe response to technical rescue incidents at Casino, Hotel, Parking structure and other applicable occupancies*

**Objective E-1-a:**

Provide Fire Department with ongoing training in all facets of Technical Rescue.

**Objective E-1-b:**

Provide adequate, USAR medium level, Technical Rescue equipment on scene within 10 minutes driving time to 90% of all incidents. Such response can be via Automatic or Mutual aid. (Note such automatic and mutual aid units will probably not be available during a regional disaster).

**Objective E-1-c:**

Provide at least 8 full time paid firefighters in the service zone, to facilitate timely confined space entry, Rapid Intervention Teams and other Technical Rescue skills in compliance with OSHA regulations.

**Objective E-1-d:**

Provide the capability to effect rescue of victims from elevated locations or from confined spaces.

**Section 5. Current Level of Service in the Jamul Community Service Zone:**

The Current level of service in the local Community Service Zone is as follows:

1. Response time:

Average response times from receipt of 911 call in dispatch center until the first company is on scene (an estimated 1-minute call processing time in dispatch center, and 1.5 minutes turnout time in station are included in these times)

Station 63; Lawson Valley: 17.2 minutes (14.7 minutes driving)

Average number of personnel on first company is 1.

Station 64; Lee Valley: 17.6 minutes (15.1 minutes driving)

Average number of personnel on first company is 1.

Station 66; Jamul: 8.9 minutes (6.4 minutes driving)

Average number of personnel on first company: 3.2

(one paid Captain plus 2.2 reserves or volunteers per shift)

Station 77; Deerhorn: 16.2 minutes (13.7 minutes driving)

Average number of personnel on first company: 2.

None of the above listed response times comply with national standards for a 5-minute response time from receipt of the call from 911. None of the above staffing complies with national standards and benchmarks. There is only one full time Captain plus 2.2 reserves or volunteers on duty per day in the service zone. This staffing is at Station 66.

**Fire Response:**

The average number of Firefighters on the scene of an emergency is 3.2 on Engine 66 and one on Medic 11 within 8.9 minutes after call to 911. Three engines, one water tender, one rescue, lighting and air unit and a Chief officer are dispatched initially. There is no Ladder truck. The areas within the Jamul Community Services Zone to which the four cannot arrive within 8.9 minutes are:

Station 63; Lawson Valley

Station 64; Lee Valley

Station 77; Deerhorn.

Refer to the Fire Station location maps in the Appendix for station locations.

Therefore the response times for the paid personnel from Station 66 to support the initial responders at the scene in other first in districts is deficient. This deficiency may worsen as population and incidents increase in the other station response districts. As the traffic on Highway 94 increases, it will become more necessary, in order to reduce response times to those areas, to add a fire station in the general area of Skyline and Jamul Vista.

Eighteen volunteers may arrive within 17.6 minutes. Twenty-eight reserves may arrive within sixty minutes. These timeframes are excessive and not acceptable for initial attack incidents.

The four firefighters from Station 66 can deploy one 1 & 3/4" hose line (180 GPM) and a two person RIT team. The Duty Chief responds and serves as the Incident Commander. 180 GPM can extinguish a 540 Square foot area involved in fire (1 room) if flashover has not occurred. Thus, the current level of service for structural fires is a 540 Square foot fire in a non-sprinklered 1 or 2-story structure (1 room). The four may also be able to handle initial response to larger, properly sprinklered occupancies of up to 5,000 square feet and one story, where the sprinklers are controlling the fire, if there are no other critical tasks necessary beyond the advancement of one hose line or one two person search team.

A key standard Fire Service Benchmark is to arrive within 4 minutes of a call to 911, 90% of the time. This is because flashover (total fire involvement of the area) can occur in 5 or less minutes from ignition. Arrival of personnel after the 5 minutes diminishes the ability to control the fire prior to flashover, and to save occupants. An occupant can die within 5 minutes of cessation of breathing or heart action. Another national benchmark is the arrival of 12 firefighters on scene within 8 minutes response time (from receipt of call to 911).

National Benchmarks and standards for the fire service are reflected in the table on the following page:

**Nationally Accepted Response & Staffing Benchmarks**

<u>National Standard</u>	<u>Organization</u>	<u>Current RFPD; JAMUL</u>
4 per company at fire or other emergency with hazardous atmosphere	National Fire Protection 1710 Association (NFPA) Std. 1410 & 1500 & Federal OSHA	NO
5 per crew needed for coordinated, effective, approach to search, rescue, suppression (high hazard occupancy)	NFPA Std. 1410, 1710 Dallas Fire Dept. study Seattle Fire Dept. study International City/County Management Association	NO
Minimum effective company staffing is 4 firefighters	Dallas Fire Dept. study Seattle Fire Dept. study NFPA Stds.	NO
Engine co. within 1.5 miles of built upon areas; 3 engines if fire flow 3,000 GPM. 1 engine if 1,000 GPM	Insurance Services Office (ISO)	NO
Ladder truck within 2.5 miles of built upon areas	Insurance Services Office (ISO)	NO
Staffed ladder truck if 5 or more buildings 35' high or required fire flow of 3,500 gpm >	Insurance Services Office (ISO)	NO
Fireground staffing to include 12 firefighters + BC	Commission on Fire Accreditation International (International Association of Fire Chiefs) and NFPA 1710	NO
National average of on-duty personnel = .48 per 1,000	International City/County Management Association (ICMA)	NO
National average total uniformed personnel = 1.59 per 1,000	International City/County Management Association (ICMA)	NO
Arrive at structure fire prior to flashover (NFPA 1710 recommends arrive in 4 minutes from 911)	FEMA National Fire Academy NFPA 1710	8.9
Arrive at EMS call within 4 to 6 minutes of cessation of heart beat or breathing	Recommended by the American Red Cross	Only on calls close to Sta. 66
Provide 2 person rapid intervention team at fires and other hazardous atmospheres	Federal OSHA NFPA Std. 1410, 1500, 1710	Varies based on location
Activate and staff an Incident Command team at hazardous materials emergencies, fires and disasters	NFPA Stds. Federal OSHA Stds. State Govt. Code Mandate	YES
Receive and dispatch alarm in 60 seconds	NFPA 1221 and ISO standard	YES
Turnout of fire station after alarm sounds in 60 seconds from 0700 to 2200 hours, and 1.5 minutes from 2200 to 0700.	International Assoc of Fire Chiefs data	YES at Sta.66

The current RFPD delivery system cannot deliver 12 firefighters on scene within 8 minutes.

If a fire requires more than five personnel within the 8-minute criteria, Mutual Aid units are requested from Heartland Dispatch center. Units are dispatched from RFPD stations in Dulzura, Dehesa, Harbison Canyon And/or units are dispatched from San Miguel, Lemon Grove, La Mesa, East County Fire District, Lakeside, Sycuan, Alpine, El Cajon or Santee. A strike team of 5 engines can be requested. The response time is up to about 35 minutes. Mutual aid truck companies can come from San Miguel or Sycuan. The response time is about 30 minutes. Response of companies from outside the RFPD is subject to availability of such companies.

Those companies may be busy on other calls and unable to respond. This is especially true in Wildfire season or after an earthquake or during other disasters.

Therefore, it is apparent that the current level of service is deficient when compared to the staffing and apparatus demands created by the critical tasking for the current Jamul Community Service Zone and the proposed project. This deficiency should be mitigated by a combination of intensified built in Fire Protection and tactical enhancements, as well as an increase in the number of on duty, staffed RFPD companies, to assure an adequate initial response.

In order to attempt to meet national criteria, an additional 8 full time, on duty firefighters are needed in the Jamul Community Service Zone as a result of this proposed project. This would then provide 12 full time personnel on duty (2 four-person companies and 2 ALS ambulances) and a total of 12 on scene within 8 minutes.

#### EMS:

The current level of EMS service in the local community service zone is 3.2 firefighters within 8.9 minutes of receipt of call to 911, and one private ambulance within 30 minutes; 90% of the time. National Benchmarks for EMS response require at least 4 on scene within 4 to 6 minutes of cessation of breathing or heart action. The 4 personnel can handle one cardiac arrest victim or 2 victims involved in an accident or other incident.

The areas in the Jamul Community Services Zone to which the 3.2 firefighters cannot arrive within the 8.9 minutes are as listed in the previous section. They include all station response districts other than Station 66 (Jamul). The areas in the Jamul Community Service Zone to which the ambulance response exceeds 8.9 minutes are the same.

The predicted number of EMS calls generated by the proposed project, is 932 per year (2.5 per day) The current EMS demand in the Jamul Community Service zone is 462 per year (1.2 per day). The projected EMS demand in 2005, without the Jamul Village, would be 666.6/year. The total cumulative annual EMS call volume in 2005, for the service zone and the Jamul Indian Village would be 1598.6 (4.3 per day).

Based upon current methods used by AMR and Grossmount Hospital to classify EMS calls, 96% would be classified as ALS calls. This would be 4.1 ALS calls per day. In reality, the ALS calls would probably be about 2.6/day. True ALS calls typically require transport. Therefore, due to the cumulative demand the efficiency and reliability of the EMS delivery system in the local zone will be impacted.

#### Summary:

The district has no ability to adequately respond to a multiple queued incident in a timely manner with RFPD resources. The service zone currently is in need of a fully paid four-person engine company and two properly located ALS ambulances (due to OSHA regulations and long response times).

The cumulative effect of the proposed project results in the need for a total full time staff of 8 firefighters (2 four-person companies) plus the two-staffed ALS ambulances. Those ambulances



and crews, and the level of service, should be under the control of the RFPD. This is done best by staffing the ambulance with RFPD personnel.

Staffing of the ambulance with Rural Fire Protection District personnel results in the following advantages:

- Local control of personnel
- Reliability of service to Jamul Community Service Zone
- Seamless training and emergency operations
- Certainty of future availability
- Local availability during regional disasters
- Potential funding generation for RFPD
- Increased firefighter staffing on emergencies

**Section 6. Recommendations for On Site Built In Fire Protection and Infrastructure for the Jamul Indian Village Casino, Hotel and Parking Structure:**

Reasonable fire protection for a facility of this type and size must be a systems approach consisting of the components of built in protection, proper access, infrastructure, proper water supply and an adequate on duty staff of properly equipped firefighters with adequate apparatus

The following recommendations are made in order to reduce the need for on duty staffing at the Casino Station to a 4-person Quint/medic engine and a 2 person ALS ambulance (6 on duty personnel). These recommendations are tactical mitigations, which, in some cases will exceed the minimum code requirements. If the applicant is not willing to exceed the minimum codes, then the RFPD will require the on duty staffing at the Casino station to be increased to a four person Medic engine, four person medic Quint, a two person ALS ambulance, and an on site RFPD fire inspector.

**Hotel:**

1. Fully Sprinklered including all areas, attics, trash chutes, etc.
2. Sprinklers supervised to fire command room, security office and off site.
3. Wet standpipe system on all floors.
4. Smoke detectors in all rooms (supervised).
5. Comply with County and State High Rise ordinance.
6. At least one of the vertical stairways shall be a 2 hour rated smoke tower with openings to the outside, for horizontal smoke removal, and equipped with standpipe outlets.
7. Fire Command Room, which will include all alarm panels and be equipped to serve as command post.
8. Smoke Management systems.
9. Fire truck access; 26' wide and to approval of RFPD.
10. Locations for ground ladder placement.
11. Firefighter roof access.
12. Manual pull alarms and emergency notification system.
13. No wood siding or wood roofs.
14. Fire resistive construction.
15. 2-hour separation from casino and parking garage.
16. Emergency power.
17. AED devices.
18. Equipment Caches on every other floor.
19. Graphic annunciator and KNOX box at main entrance.
20. No bus parking, unloading or loading within 50' of building.
21. HVAC inlets away from vehicle parking or staging areas.
22. At least one EMS elevator.
23. Enclose Elevator lobby and provide smoke detector.
24. Provide high-rise elevator controls.

**Casino:**

1. Fully sprinklered with no exceptions. All areas including attics, trash areas, Porte Cochere, etc.

2. Sprinklers supervised in Fire Command center, security office and off site.
3. Fire Command room which will include all alarm panels and equipped to serve as command post.
4. Wet standpipe system.
5. Wide corridor access through casino for hose line advancement at the same time evacuation is occurring.
6. 2-hour separation from parking garage/hotel.
7. Roof access for firefighters.
8. Ground access for fire trucks; 26' wide and to approval of RFPD.
9. Separate floor areas approximately every 40,000 square foot or provide equivalent fire protection.
10. No wood siding or wood roof.
11. Adequate exiting from multiple sides.
12. Emergency generator.
13. HVAC inlets away from vehicle parking.
14. Smoke Management system.
15. Manual smoke vents on roof.
16. Manual pull alarms/ Emergency notification system. Supervised to security office and fire command room.
17. AED devices.
18. 2-hour separation between electric signs and building.
19. No flammable interior finishes.
20. Enclose areas behind machines to prevent trash build up.
21. Kitchen and hood systems.
22. Graphic annunciator and KNOX box at main entrance.
23. At least one EMS elevator.
24. One stairway to second floor to be enclosed and have wet standpipe.
25. Provide adequate height for fire truck access under Porte Cochere.
26. No tents or air supported structures.
27. Firefighter access doors every 100' around perimeter (in addition to required exits).
28. No bus parking or loading/ unloading within 50' of any building.

**Parking Garage:**

1. Fully sprinklered.
2. Manual Pull stations.
3. Wet standpipes.
4. Carbon Monoxide monitoring system, if necessary.
5. Comply with NFPA 88-A.
6. Multiple Stairways.
7. Adequate means of smoke removal.
8. At least one EMS elevator.
9. Call boxes to Security office.

**Access:**

1. Provide 26' wide road with proper radius around buildings, to Fire Department approval.
2. Provide Vegetation Management plan and defensible space.

3. Provide locations for spotting of aerial truck (Quint).
4. Provide locations for setting of ground ladders.
5. Provide Firefighter access paths around buildings to Fire Department approval.
6. Provide lifeflight helipad.

**Fire Protection Water Supply:**

1. At this point, due to lack of details the use of Type V construction must be assumed. Per Appendix 111-A, Fire Code, provide 4000 GPM for 4 hours at the same time as peak domestic water demand. If fire resistive construction is used, per Appendix 111-A, fire flows may be reduced. However, at least 2000 GPM should be provided at adequate pressures.
2. Provide redundant fire pumps if pumps used (1 electric and 1 diesel).
3. Hydrants to be spaced every 300'.
4. Fire Department sprinkler/standpipe connections to be at front of property and within 25' of a hydrant.

**Miscellaneous:**

*Note: All facilities should be designed and built to California Building and Fire Code requirements and the requirements of the RFPD.*

1. Provide daily fire inspections by Security force.
2. Occupant load to be checked daily by Fire Station crews.
3. Fire Station crews to conduct regular fire safety and fire system inspections.
4. Remove all trash, ash receptacles etc, frequently and at closing time.
5. All trash areas to be sprinklered and separated from buildings by firewall.
6. Casino provide on site EMT-D personnel with AED.
7. Provide on site fire station with direct on site access to all locations.
8. Any LPG tanks to be properly located away from buildings and traffic. They should also be properly anchored (seismic).

**Section 7. Additional Resources Necessary to Support a Combined Delivery Model to the Jamul Community Service Zone and to the Proposed Jamul Indian Village Project:**

The additional resources needed by the Rural Fire Protection district, within the next 5 years, to provide reasonable fire and EMS protection to the Community Service zone and to the Jamul Indian village project area as follows:

1. Administrative Staff:
  - a. Fire Chief (current)
  - b. Fire Marshal (current)
  - c. Full time training officer at Chief officer level (pending)
  - d. Full time district clerk (current)
  - e. Full time secretary (currently part time)
  - f. Full time mechanic with mobile service vehicle (new position)
  - g. Contractual Plan Checker/ new development inspector for Jamul Village project
  - h. Full time civilian Fire Inspector/ plan checker (new position)
2. Cross Trained Suppression Personnel:
  - a. Eight full time firefighters every day (24 post positions) to staff two engine companies. Two of these shall be Paramedics.
  - b. Two EMT-Ds and two Paramedics every day (12 post positions) to staff two ALS Ambulances.
3. Equipment:
  - a. Automatic External Defibrillator (AED) on each apparatus.
  - b. Thermal imaging camera on the Quint.
  - c. Each apparatus to be equipped to ISO and NFPA standards.
  - d. SCBA bottle refilling station (if there is none currently).
  - e. Full compliment of ground ladders on Quint.
  - f. Adequate number of SCBA.
  - g. High angle/confined space rescue equipment.
4. Apparatus:
  - a. One 2000 GPM 105' or 75' Quint (to be determined based upon detailed access plans for Casino/Hotel).
  - b. One Properly equipped and configured Interface engine.
  - c. Two ALS transport ambulances.
  - d. One reserve engine for Casino station for cross staffing and staffing by reserves/volunteers.
  - e. One mini pumper/brush type truck for use in parking garage.
  - f. One USAR heavy apparatus fully equipped to OES standards.
  - g. Two additional staff vehicles.

5. Paramedic Transporting EMS System:

- a. Two ALS transport ambulances with all necessary equipment.

6. Facility Locations:

- a. One fully staffed fire station on five-acre site at Jamul Indian Village Casino/Hotel. See location map in Appendix.
- b. One fully staffed residential type station in general area of Skyline and Jamul Vistas. See location map in Appendix. This station is needed in order to provide ISO and OSHA compliant fire and EMS response to this area and to station 63 and 64 areas. It will also provide response to the principal commercial area and will provide needed support to Station 66 at Casino/Hotel calls as well as multiple queued responses.
- c. Stations 63,64,77 stay as is and as staffed currently. There is no opportunity to shut 63,64 or 77 and relocate due to the large, isolated areas they cover.
- d. The Fire District administrative staff should be co-located at the Jamul Indian Village station. This station should also have provisions for manipulative training evolutions, classroom and repair/supply facility.

7. Generic Facility Design Criteria:

- a. Jamul Indian Village Casino/Hotel Station:

The proposed fire station plans by Cunningham group were reviewed. Provision for administrative offices, supply warehousing, vehicle repair, and manipulative training should be made at the new Jamul Indian Village Casino Station site.

The provision for a future Battalion Chief office and bedroom is reasonable.

The drawing shows no Hazardous Materials or EMS/Biological hazard disposal/decontamination areas. It also does not indicate a turnout cleaning area or hand washing sink. Available equipment storage space may be inadequate.

There should be a total of 11 bedrooms (8 if second engine not needed due to built in protection at Jamul Indian Village). They include 2 bedrooms for the 2-person ambulance crew; separate from the bedrooms for the remainder of the crew, and with a separate alerting system. A bedroom and office for future Battalion Chief, and eight bedrooms to house two 4-person companies in the future

The following conceptual features should be included in the Fire Station, and shown on the Architect's conceptual drawing. These items and their size/location, etc., are subject to detailed evaluation and design by the Architect, as the author is not an architect. The architect may also propose additional features and rooms. The fire station should be designed for a 50-year life cycle.

1. 3 bay, 2 deep, drive through, one story station on a five-acre site. Station to be set back from neighbors and road. Apparatus bay depth to be approximately 80' as shown on plans. Width to be at least 60' and as needed based upon the apparatus type.
2. Fully sprinklered and equipped with smoke detection.
3. Station should be single sided for expansion (engine room on one end).
4. Non-combustible construction with Class A roof.
5. Proper seismic design. Locate outside of any flood plain.
6. Apparatus to exit onto a side street (not Highway 94\*). Apparatus must also have unimpaired response route to all Jamul Indian Village structures.
7. Traffic light control for station.
8. OSHA required smoke exhaust system.
9. Front apron to be 15' longer than longest apparatus.
10. Bay width to be at least 15' with 14' wide by 14' high doors. Actual size to be determined by RFPD based upon current and future apparatus size (including the Quint and other apparatus).
11. At least a 16' ceiling in apparatus room.
12. Manual/earthquake proof/override system on apparatus doors.
13. Adequate parking for staff and reserves/volunteers.
14. EMS infectious material decon area (Biohazard decon and disposal).
15. Hazardous Materials decon area.
16. Turnout gear wash down area.
17. Hand washing sink for after emergency calls and prior to entering living quarters.
18. Bathroom adjoining apparatus room.
19. Hose dryers and storage.
20. Drill tower with hydrants and outside drill ground area.
21. SCBA filling station.
22. Oxygen bottle filling station.
23. EMS equipment and drug storage; secured.
24. Study room/ classroom in an isolated quiet area. (750 square feet).
25. Public meeting room: (750 Square feet).
26. Ample equipment lockers for all paid, reserve and volunteer staff.
27. Repair shop area for station and equipment repairs and for mechanic.
28. Vehicle fuel supply (aboveground convault type protected tank).
29. Emergency generator and Propane tank for back up supply.
30. ADA compliant.
31. Living, kitchen, bedroom facilities for 11 on duty personnel. Bedroom areas to be isolated/ away from living areas/ apparatus bay.
32. Exercise room as shown.
33. Separate bathrooms/shower facilities for men/women.
34. Energy efficient and soundproof facility.
35. Paramedic work area/office with computer station.
36. Wired for current and future technology, computers,internet, satellite , fiber optics, etc
37. Battalion Chief office/bedroom.
38. Captain office and reception area near main entrance.
39. Private room for use in making personal telephone calls.
40. Room for Law Enforcement to use phone/write reports.
41. Station to be designed to provide security and protection against theft, vandalism, and terrorism.

42. Administrative offices for the Fire District.
43. Equipment and parts storage area for mechanic.
44. Ample room for misc. equipment storage.

*\* It is critical that fire stations are located so that apparatus can respond in several different directions. It is also critical that apparatus do not have to exit directly onto a busy highway or road, such as Highway 94. The current situation at Station 66 is very dangerous from an oncoming traffic standpoint. In addition, as traffic increases, response will be delayed. The fire apparatus must also be able to immediately gain unimpaired access to all Jamul Indian Village structures, without being impacted by traffic, parked vehicles and pedestrians.*

The approximate square footage would be about 16,000 square feet, subject to proper room sizing, etc, by architect. The rough cost is probably about 2.8 million dollars, using an estimated square foot cost of \$175.00. With refinements, it could probably be done for less. The Jamul tribe may be able to construct the station for less money due to exemption from sales tax (at least 8%) and possible exemption from the Davis Bacon prevailing wage legislation (if they are exempt).

The author of this study is not familiar with the architect who did the conceptual rendering. Detailed design should be done by a qualified fire station architect with a proven background in fire station design in California. The Architectural firm should be to the approval of the fire district.

The RFPD Chiefs should tour various recently constructed stations, including those designed by the chosen Architect.

b. Second Station; in general area of Skyline and Jamul Vista:

This station is needed notwithstanding the presence of the Jamul Indian Village project. This station is needed in order to meet the goals and objectives and levels of service established in this study. It is also needed to provide a 4 person RIT team on all structural fires, and to provide faster emergency response to station 63 and 64's areas. In addition, it will provide additional needed forces in the principal commercial areas. It is also needed in order to provide response with Engine 66 to the Jamul Indian Village project (3.1 miles) and to respond to multiple queued incidents. Refer to station location map in Appendix.

This station can be a much smaller, residential type station on about a one-acre lot. The property could be obtained from a development as a mitigation. The developer could be required to build the station as a large two-story house, which blends into the subdivision. The apparatus room would be an oversized garage. If the fire station location becomes less desirable in future years, due to growth patterns, the fire district can resell the property as a home.

The station would have the same mandated safety and ergonomic features as listed for the Casino Station. The station would be designed to house a 4-person engine company and a 2-person ALS ambulance crew.



The station would be a two-story house with 6 bedrooms. It would also have a recreation/living area and a physical fitness room. In addition, there would be a Captain's office and a paramedic office. The structure and engine room would be fully sprinklered. There would be smoke detection in the living quarters, and apparatus exhaust systems in the apparatus room.

The engine room should be a drive through. It would house one Interface Engine, one ALS ambulance, and a heavy USAR unit. The engine room would include turnout gear lockers, decon stations as for the Jamul Indian Village station, a secured EMS locker area, hose dryer and storage, and a hand-washing sink.

There would be a small combination classroom/study room built like a den. There would be no community room for the public.

Ample off street parking for personnel, reserves and volunteers would be needed.

The approximate square footage would be around 4,000 to 4,500 square foot plus a 3,200 square foot apparatus room, subject to Architectural sizing and design.

The apron in front of station should be 15' longer than the apparatus, and have an adjacent fire hydrant. There should be provisions for traffic control.

The structure should be a model in Urban Wildland Interface structural safeguards. The property should also have a demonstration garden for the public to view proper UWI landscaping.

The station design should be by a qualified architect, and be to approval of the Fire District.

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**Section 8. Additional Resources Necessary to Support the Provision of Reasonable Fire and EMS Services to the Jamul Community Services Zone without Contracting to the Jamul Indian Village Project:**

The additional resources needed by the Rural Fire Protection District to support reasonable Fire and EMS response within the Jamul Community Services zone if contract protection is NOT provided to the Jamul Indian village project is as follows:

1. Administrative Staff:
  - a. Fire Chief (current).
  - b. Fire Marshal (current).
  - c. Training Officer at Chief rank (pending).
  - d. Full time district clerk (current).
  - e. Full time secretary (currently part time).
  - f. Full time mechanic with mobile service truck.
  - g. Full time civilian inspector.
  
2. Cross Trained Suppression Personnel:
  - a. Four additional full time firefighters per day (12 post positions). One shall be a paramedic.
  - b. Two additional personnel to staff additional ALS ambulance. One shall be a paramedic, and one an EMT-D (6 post positions).

These additional personnel are needed in order to staff a new fire station in general area of Skyline and Jamul Vista. This station is needed in order to guarantee a 4 person OSHA mandated Rapid Intervention Crew (RIC) on all structure fires and confined space incidents. It is also needed, in order to provide ISO compliant response to the principal business district and to any occupancy requiring 2,000 GPM fireflow. In addition, the station is needed in order to improve response times for Fire and EMS services to this area and to Station 63 and 64 areas. If the Jamul Indian Village project is built and if the project is protected by a reservation or private fire department, this new station becomes even more critical. The excessive traffic predicted for the Jamul Indian Village Casino Project may significantly impact any response from Station 66 via Highway 94.
  
3. Equipment:
  - a. Automatic external defibrillator (AED) on each apparatus.
  - b. Thermal imaging camera on the engine.
  - c. Apparatus to be equipped to ISO and NFPA standards.
  - d. 35' ladder and 24' ladder on engine.
  - e. Portable or built in generator on apparatus.
  - f. SCBA and Oxygen bottle filling station (if none currently).
  - g. Adequate number of SCBA.

- h. Supply of Class A and B foam, "Barricade" foam and associated education equipment.
- i. High angle/confined space rescue equipment.

4. Apparatus:

- a. One 1500 GPM Structural fire & Interface equipped engine with Class A foam CAF system.
- b. One ALS transport ambulance; fully equipped.
- c. One Heavy class USAR apparatus; fully equipped to OES standards. To be housed at Skyline station.
- d. Two additional staff vehicles.

5. Facility Locations:

- a. Relocate Station 66 to a permanent facility off of the Reservation on fee simple land, but in the same general area; preferably south of Highway 94. The location should be somewhere in the general area of Melody and Procter Valley Roads. However, if no candidate sites are available below the Highway, a potential site may become available at the Simpson Ranch project on Highway 94. This station would be a combination headquarters fire station and administrative offices.

The station would be of the same size and type as described for the Jamul Indian Village project, in Section 7. This station would require about 5 acres. It should not take direct access to Highway 94 due to potential traffic congestion. It should be on a side street with fast access to Highway 94. Traffic light control should be provided on Highway 94.

The mechanical repair shop, warehouse and future training facility would need to be located on a piece of property where these operations would not generate complaints re noise.

- b. Provide new fire station in general area of Skyline and Jamul Vista. This station would be the same as described in Section 7. Refer to station location map in Appendix. It should be designed as follows:

1. Residential type station:

This could be a 2-story house having about 4000 to 4500 square feet plus the apparatus room. The station should be a drive through station on about 1 acre. It would be a 6-bedroom home which should be required of any new development in the area, as a mitigation. The developer could be required to provide the land and build the station for the Fire District. The station should blend into the type of homes in the development. The developer should be required to transfer ownership to the district. If the station location becomes less viable in future years based upon growth or traffic, then it could be sold as a house. The size of the home and the

garage would be very desirable; especially for someone with an RV or a boat.

The station and property should be designed as a model in Urban Wildland Interface Fire Protection, and should include a demonstration garden open to the public.

The station should, in concept, have the following features:

- a. Two apparatus bays; two stalls deep (accommodate 4 pieces of apparatus). Drive through station if possible. Apparatus bay width should be at least 40' and as needed to house the apparatus. Length shall be adequate to accommodate a future Quint or aerial apparatus. Length should probably be at least 80'. Total apparatus room square footage = 3200.

A single chassis Quint with a 105' long aerial ladder is about 40'8" long. A typical, properly designed, structural engine is 32' 5" long. The width is about 96" for each plus mirrors (a total of 10' in width for the apparatus). Apparatus room to be on side of house to allow expansion. The apparatus bay should also accommodate the USAR vehicle.

- b. Apron in front of apparatus bay to be at least 15' longer than the longest apparatus. Fire hydrant to be located next to apron.
- c. Aboveground vehicle fuel supply.
- d. Apparatus door openings to be of adequate width (at least 14') and of adequate height to house a future Quint or aerial ladder truck. Apparatus doors to be openable after an earthquake and during power outage.
- e. Adequate off street parking.
- f. Exhaust system in apparatus room.
- g. Adequate lockers for 18 personnel plus reserves/volunteers.
- h. Adequate equipment storage areas. Could be separate outbuilding.
- i. Emergency generator and reserve LPG supply.
- j. Building to be seismic and flood resistant.
- k. Building to be fully sprinklered. Smoke detection to be provided in crew quarters.
- l. HAZMAT decon station in apparatus room.
- m. EMS decontamination and Biological Hazard/infectious material control station in apparatus room.
- n. Hand washing sink in apparatus room.
- o. Turnout gear wash down area.
- p. Hose dryer and hose storage area.
- q. Secured EMS equipment and drug locker.
- r. SCBA filling station.
- s. Oxygen bottle filling station.
- t. Small workshop.

- u. Station to house 6 on duty (6 bedrooms).
- v. Station to have kitchen, dining area and day room/recreation room.
- w. Separate bathroom/showers for men and women.
- x. Captain office and Paramedic work area
- y. Gym.
- z. Private phone booth to make personal phone calls.
- bb. Building wired for current/future technology.
- cc. ADA compliant.
- dd. Traffic control light.

Actual design and sizing of all rooms, building, etc would be the responsibility of an architect experienced in Fire Station design.

Approximate total square footage would be about 7,700 square feet including the apparatus room. Estimated rough cost of the structure and furnishings would be about 1.3 million.

c. Future Station in Proctor Valley Area:

The Rural Fire Protection District should plan to construct, staff and operate a future residential type fire station in the Proctor Valley area, in the general area of Proctor Valley road. This station should be required from a future developer when significant construction occurs in the Hidden Valley and Otay Lakes areas. The station should be placed in service when 1000 units are occupied or when one emergency call per day occurs in the area. The station should be the same size and type as the Skyline station. It should be equipped and staffed the same as recommended for the Skyline station.

**Section 9. Optimum Delivery System:**

This section describes the optimum delivery system for the Jamul Community Service zone with the Jamul Indian Village included.

The word "Optimum" when describing a fire protection and EMS delivery system has several components. They are:

1. Risk based.
2. OSHA compliant.
3. Meets ISO standards.
4. Implements the goals, objectives, and standards of cover and levels of service defined in this study.
5. Is cost effective.
6. Provides response reliability.
7. Provides adequate initial intervention in a timely manner
8. Considers the benefits of built in protection at a property.
9. Does not deplete protection to other portions of the Service Zone.
10. Considers the potential for multiple queuing of calls.
11. Considers the constraints of heavy traffic.

When discussing the optimum system for the Jamul Indian Village, it is assumed that all of the built in mitigations listed in this report are properly installed and maintained. If this does not occur, and if the Jamul Indian Village project is built only to minimum code requirements, or no code requirements, then the optimum system described in this section will not be adequate. An additional engine company with a full time 4-person crew will also be necessary due to the unmitigated risk.

It must be stated that the optimum system described herein is not the maximum system, which would be needed for any major fire. One can see by a review of the critical tasking provided in this study, that the required staffing could reach 55 firefighters or more. If the Jamul Village were built in a large community such as San Diego City, Los Angeles, Anaheim, Huntington Beach, or other similar sized communities, the initial response to any actual, confirmed, structural fire at this type of facility would probably be four 4 person engine companies, two 4 person ladder trucks, and two chief officers for a total of 26 personnel on the initial response. More personnel may then be summoned after size up occurs.

It is unreasonable to require the same level of staffing for the Jamul Indian Village if adequate built in protection is provided. The objective of such protection would be to immediately detect a fire while it is small, and apply water to it through the sprinkler system, while at the same time alerting occupants to evacuate and notifying 911. If the systems do not control the fire; other RFPD units as well as automatic and mutual aid units can be summoned. If the systems do not control the fire, it could possibly result in total destruction by fire. In this case, the delayed response of other RFPD companies as well as automatic and mutual aid companies wont matter other than to keep the fire from spreading to other buildings and/or to vegetation. The facility could be totally destroyed and the Casino and or hotel would be out of business for many months.

Summary of the Optimum System:

1. Fire station on five-acre site at Jamul Indian Village, as described in this study.
2. Full time staffed Four Person Medic Quint (2,000 GPM. 75' to 105' aerial).
3. Unstaffed Structural Engine Co for cross staffing and for staffing by Reserves/Volunteers.
4. ALS ambulance with full time staffing of 2.
5. Mini pumper for use in parking garage.
6. Built in structural protection as described in this study.
7. Fire District Offices co-located at on site Jamul Indian Village Casino Fire Station.
8. Second Fire Station in general area of Skyline and Jamul Vista. One full time staffed 4 person Medic Engine and a full time staffed 2 person ALS ambulance.
9. USAR Heavy apparatus at Skyline Station.
10. Full time Fire Chief (current).
11. Full time Fire Marshal (current).
12. Full time Training officer at Chief Officer rank.
13. Full time Mechanic with mobile service vehicle.
14. Vehicle for Training officer.
15. Contractual plan checker/inspector for Jamul Indian Village Project.
16. Full time civilian plan checker/inspector.
17. Vehicle for inspector.
18. Full time district clerk (current).
19. Full time Secretary (currently part time).
20. Daily fire inspections and occupant load checks by Firefighters.
21. AED's located at Casino and Hotel.
22. Continue automatic and mutual aid agreements.
23. Continue reserve and volunteer program.
24. Stations 63, 64 and 77 continue as is.
25. Small equipment as listed in this study.
26. Adequate on going funding of the Fire Department Training and Fire Prevention programs, to address occupancies such as the Jamul Indian Village.
27. Possible future residential fire station in Proctor Valley area, subject to growth (developer funded). Station would then be second due to the Jamul Indian Village.

*Note: As stated earlier, it is recommended that the RFPD pursue, through legal avenues, taking over the ambulance transport program.*

**Section 10. Estimated Fair Share Costs:**

The purpose of this section of the study is to estimate the fair share costs, which should be borne by the Jamul Indian Village project and by the Fire District if the Jamul Indian Village project is constructed and operated.

**BACKGROUND:**

The Rural Fire Protection District (RFPD) has some significant operational and administrative deficiencies at this time notwithstanding the potential construction and operation of the Jamul Indian Village. Such deficiencies are not a reflection on the small, hard working staff of the RFPD. They are a reflection of inadequate funding, inadequate staffing levels, inadequate numbers of apparatus and long response times. As stated before, this Community service zone is vulnerable to a major loss from an Urban Wildland Interface fire, and is vulnerable to other fire and life safety risks. For example, a potentially serious UWI fire occurred on 12-19-00 in Harbison Canyon. Three structures were destroyed. It required 23 fire companies and 78 personnel and 5 chief officers to control the Fire. The majority of resources were Automatic and Mutual aid companies. It took up to an hour for all units to arrive on scene. The first out of district 5 engine strike team arrived in 15 minutes. Had this been a wind driven fire with lower humidity and in fire season, the Fire Chief estimated that 500 structures could have been lost.

Another fire occurred on 12-27-00 at 1315 hours. This fire occurred at Jamul Drive and Mexican Canyon. The fire threatened 60 homes and burned 50 acres. Twenty plus engines, 60 firefighters and three Chiefs were on scene.

A major fire, the Viejas Fire, occurred on 1-3-01. This fire burned 10,353 acres and destroyed 8 homes, 33 out buildings and 17 vehicles. Over 2,000 firefighters from multiple states were assigned to the fire.

These same types of fires will continue to occur in the Jamul Community Service Zone within the next 10 years, based upon typical 50-year fire cycle history. It has been 30 years since the last major UWI fire in the Zone. As vegetation ages, the fire threat will increase.

A basic tenet of modern community fire protection planning is that those who are creating an impact above the current baseline level of service (that level at which it is implied to be adequate by the community, based upon the funding allotted) should provide the funding for the protection of such risks. The community at large should not be required to fund protection for a new development, which creates a risk exceeding the baseline acceptable community risk. Conversely, the new development should not be expected to underwrite the improvement of community fire protection not associated with the risks presented by the development. For example, the Jamul Community Service zone has needs for improvement of its emergency services delivery system notwithstanding the presence of the Jamul Indian Village project. Those needs were identified earlier in this study.

The estimated fair share costs, which should be borne by the new development, would involve funding for the following, on an ongoing basis. It should be noted that the Fire Station would need up front funding as well as ongoing Operations and Maintenance costs (O and M). Staffing would be funded on an ongoing basis. Apparatus could be purchased or leased. It is imperative



that the Jamul Indian Village and the Fire District enter into an acceptable legal service contract satisfactory to all parties. That contract should be created by an Attorney and should, at least, include the following:

1. Agreement to waive sovereign immunity and abide by the Fire District Codes, Ordinances and requirements for this project.
2. Agree to install and maintain the tactical enhancements recommended in this study
3. Agree to a 5 or 10-year contract with acceptable exit clauses and adequate notification requirements and timeframes prior to any cancellation by any party.
4. Agree to fund the staffing to required levels, including inflation adjustments.
5. Agree to pay all initial and ongoing fixed asset and O and M costs for duration of leases or finance contracts notwithstanding the length of contract between the District and the Village.

**Estimated Fair Share Costs To Be Borne By Jamul Indian Village**

ITEM	INITIAL COST	ANNUAL COSTS	IMPLEMENTATION TIME FRAME
Fire Station and furnishings	2.8 million	\$28,000 (o&m). Option is to finance station for 30 years: \$93,333/ year.	60 days prior to operation of Casino/Hotel
2000 GPM 75' to 105' Quint fire truck	\$695,500.	\$69,550. If leased for 10 years	90 days prior to operation of Casino/Hotel
Reserve engine (2000 GPM)	\$369,150.	\$36,915. If leased for 10 years.	60 days prior to operation of Casino/ hotel
ALS Ambulance	\$107,750.	\$21,550 if leased for 5 years.	30 days prior to operation of Casino/ Hotel
Mini pumper for parking garage	\$120,000.	\$12,000. If leased for 10 years.	30 days prior to operation of Casino/ Hotel.
Staffing; 4-person crew. Captain, engineer, 2 firefighters (one of which is medic)	\$553,998.	\$553,998.	90 days prior to operation of Casino/ Hotel.
Staffing; 2 person ALS ambulance	\$270,000. plus \$4,000 O and M = \$274,000.	\$274,000.	90 days prior to operation of Casino/ Hotel
Contractual plan checker/ inspector for construction period	\$50,000.	\$25,000. Per year for 2 years.	90 days prior to construction beginning at Casino/Hotel
Misc. equipment associated with station and apparatus	\$100,000.	\$20,000/ year. (5 year life cycle)	60 days prior to operation of Casino/ Hotel.
Estimated totals	\$5,070,398.	\$1,134,346.	
Optional total (if fire station is financed over 30 years and if all equipment is financed or leased)	\$1,134,346. first year plus any initial fees to begin lease or financing.	\$1,134,346. plus inflation adjustments to salaries and O&M.	Same as above

In addition, if in the future, significant responses are necessary to the Jamul Indian Village from the Skyline station, the Jamul Indian Village should be charged a fee per response or should assist in funding a fair share of the operational costs for that facility.

The table on the following page estimates the costs to be borne by the RFPD. These costs include all other fixed asset and staffing needs not associated with the Jamul Indian Village Station.

**Estimated Fair Share Costs To Be Borne By The RFPD If Contract Protection Is Provided To The Jamul Indian Village Project**

ITEM	INITIAL COST	ANNUAL COST	IMPLEMENTATION TIME FRAME
Fire Station and furnishings (Skyline Station)	1.3 million	\$20,000 O and M. Option to fire station cost is annual financing over 30 years: \$43,333/ year	90 days after operation begins at Casino/Hotel
Structural/ Interface Engine with CAF system	\$250,000.	\$25,000 annual if leased for 10 years	90 days after operation begins at Casino/Hotel
ALS ambulance	\$107,750.	\$21,550. annual if leased for 5 years.	90 days after operation begins at Casino/Hotel
Staffing: 4 person crew: Captain, Engineer, 2 Firefighters (one of which is a medic)	\$553,998.	\$553,998.	90 days after operation begins at Casino/Hotel
Staffing: 2 person ALS ambulance for Skyline station	\$270,000. Plus \$4,000. o&m = \$274,000.	\$274,000.	90 days after operations begin at Casino/Hotel
Misc. equipment associated with station and apparatus	\$70,000.	\$14,000 annually if financed over 5 years. (5 year life cycle)	Prior to completion of fire station
Change Part time secretary to full time position	\$15,000. additional	\$15,000 additional	6 months after operations begin at Casino/Hotel
Civilian Fire inspector (Captain pay rate)	\$52,666.	\$52,666.	90 days prior to construction beginning at Casino/Hotel

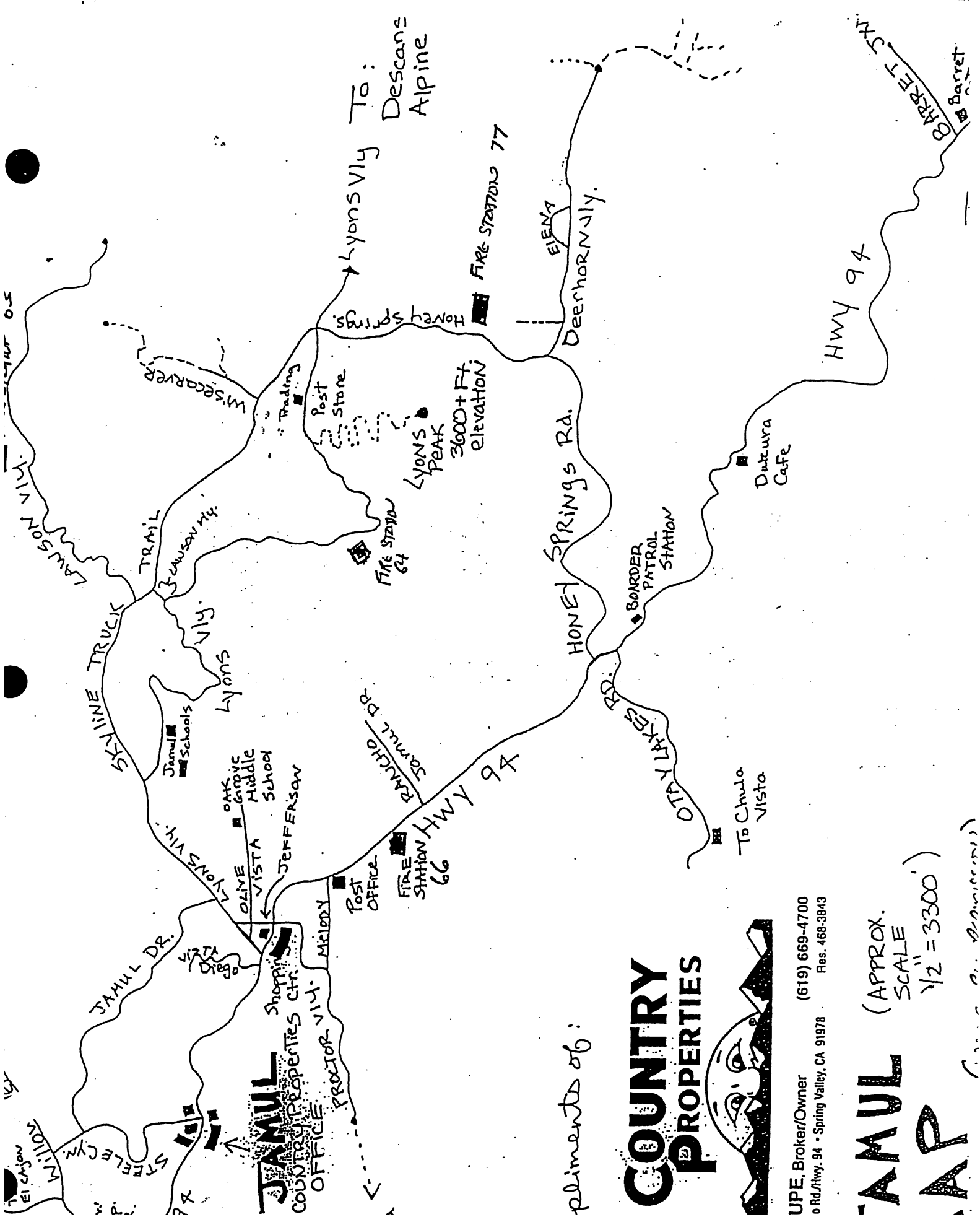
**Summary:**

The above costs are conceptual estimates only for purposes of planning. Salaries are subject to annual COLA adjustments and raises. Fixed assets are subject to inflationary increases.

This is not a fiscal analysis. The RFPD District Board of Directors will need to develop actual costs for each item, and to recommend the best way to fund each item. All actual items, costs and funding/ financing methods to be to approval of the Fire District. Actual costs may be less once actual bids are obtained and/or costs analyzed. The decision to fund all items upfront or to lease is a decision to be made by the Fire District and Jamul Indian Village after conducting an in-depth fiscal analysis of all options by those qualified to do such analysis.

**Appendix:**

1. Map of Jamul Community Services Zone
2. Site Plan of Jamul Indian Village
3. Fire Station Location Illustrations:
  - Current Fire Station Locations
  - With Provision of Protection to Jamul Indian Village Project
  - Without Contracting with Jamul Indian Village
  - 1.5 mile Response Circles; Optimum System with Contract to Jamul Indian Village
4. Fire Spread Map; Viejas Fire



To: Descans Alpine

pliments of:

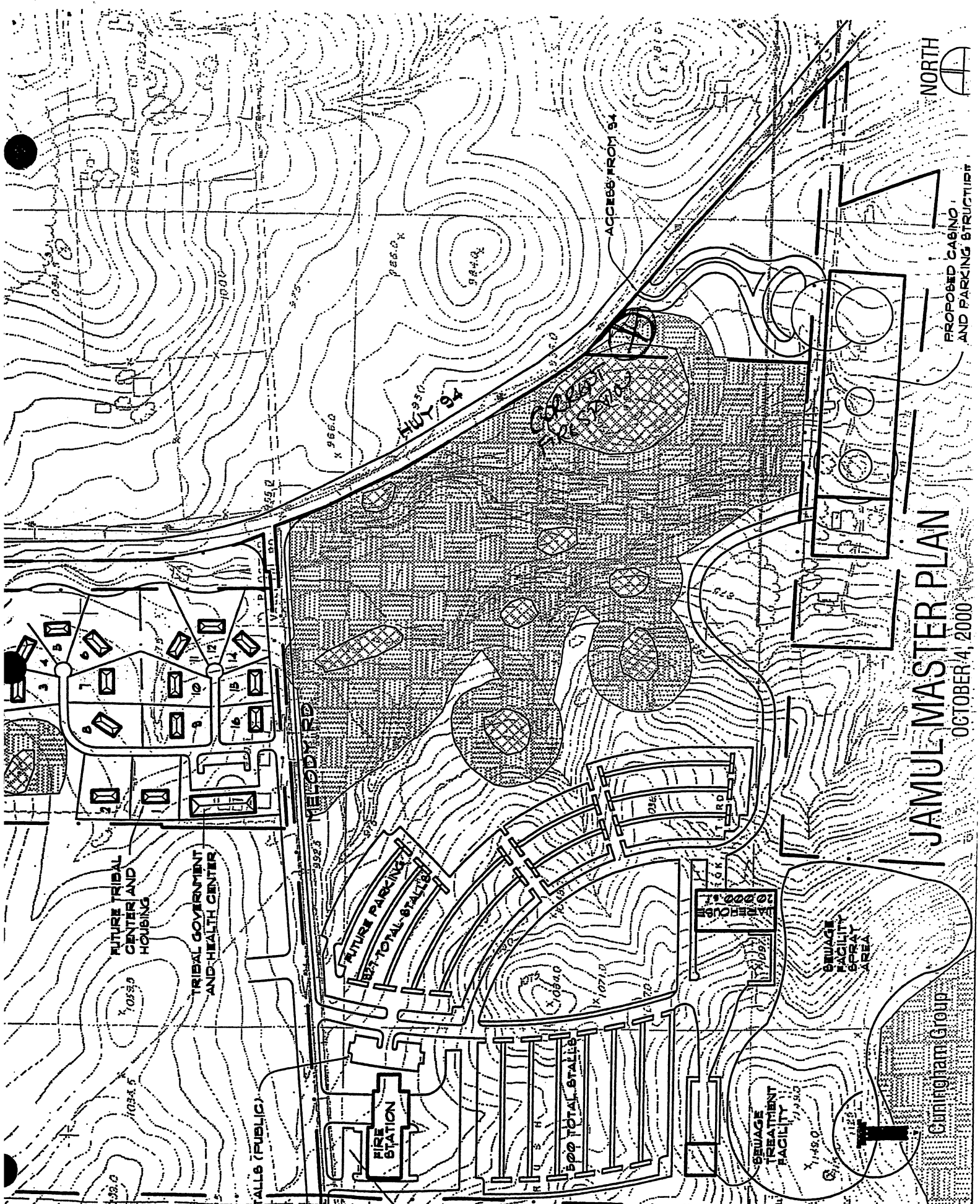
**COUNTRY PROPERTIES**



UPE, Broker/Owner (619) 669-4700  
 9100 Rd/Hwy. 94 • Spring Valley, CA 91978 Res. 468-3843

**JAMUL AP** (APPROX. SCALE 1/2" = 3300')

(Drawing is approximate)



PROPOSED CASINO  
AND PARKING STRUCTURE

# JAMUL MASTER PLAN

OCTOBER 4, 2000

Cunningham Group

FUTURE TRIBAL  
CENTER AND  
HOUSING

TRIBAL GOVERNMENT  
AND HEALTH CENTER

FUTURE PARKING  
187 TOTAL STALLS

FIRE  
STATION

500 TOTAL STALLS

SEWAGE  
TREATMENT  
FACILITY

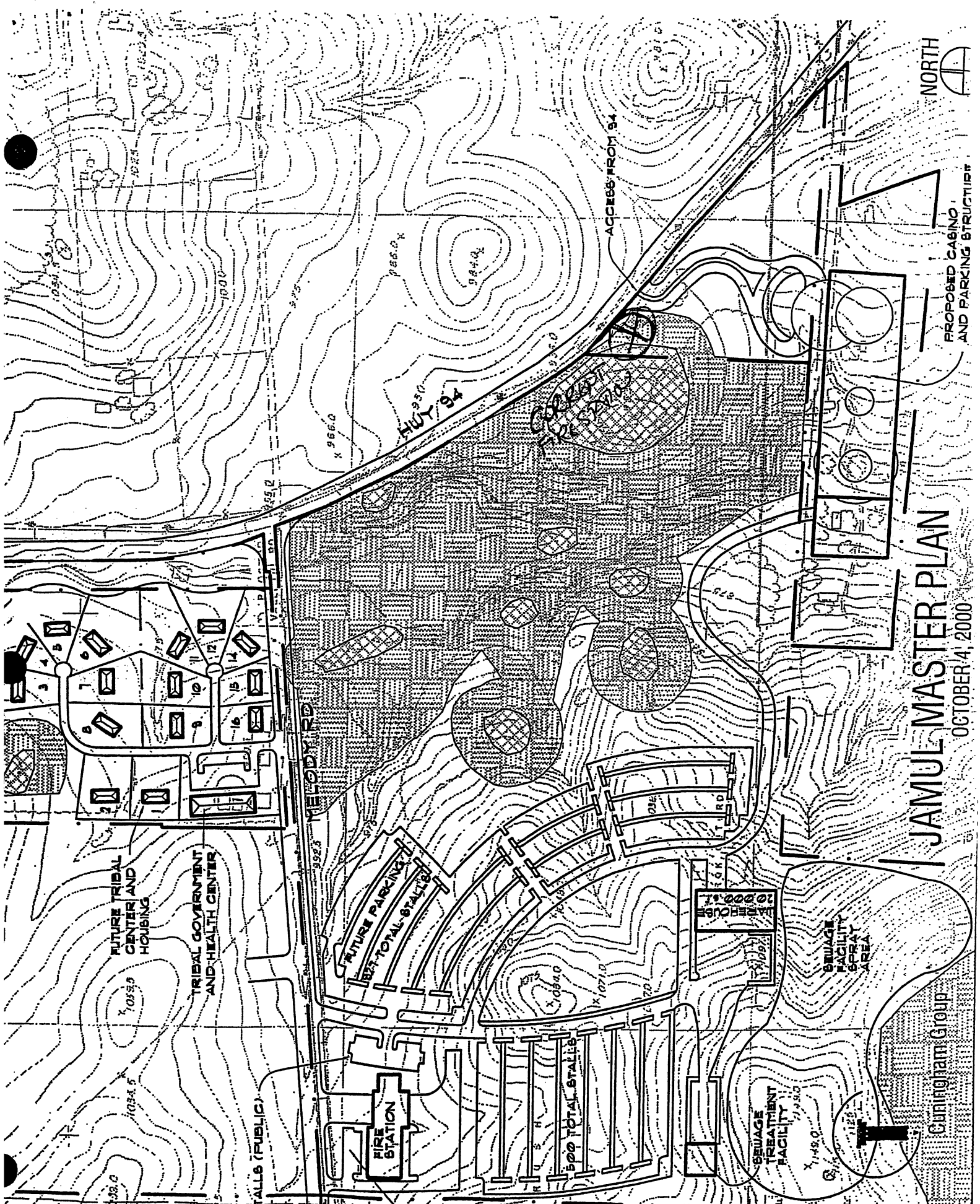
SEWAGE  
FACILITY  
SPRAY  
AREA

STALLS (PUBLIC)

MELODY RD

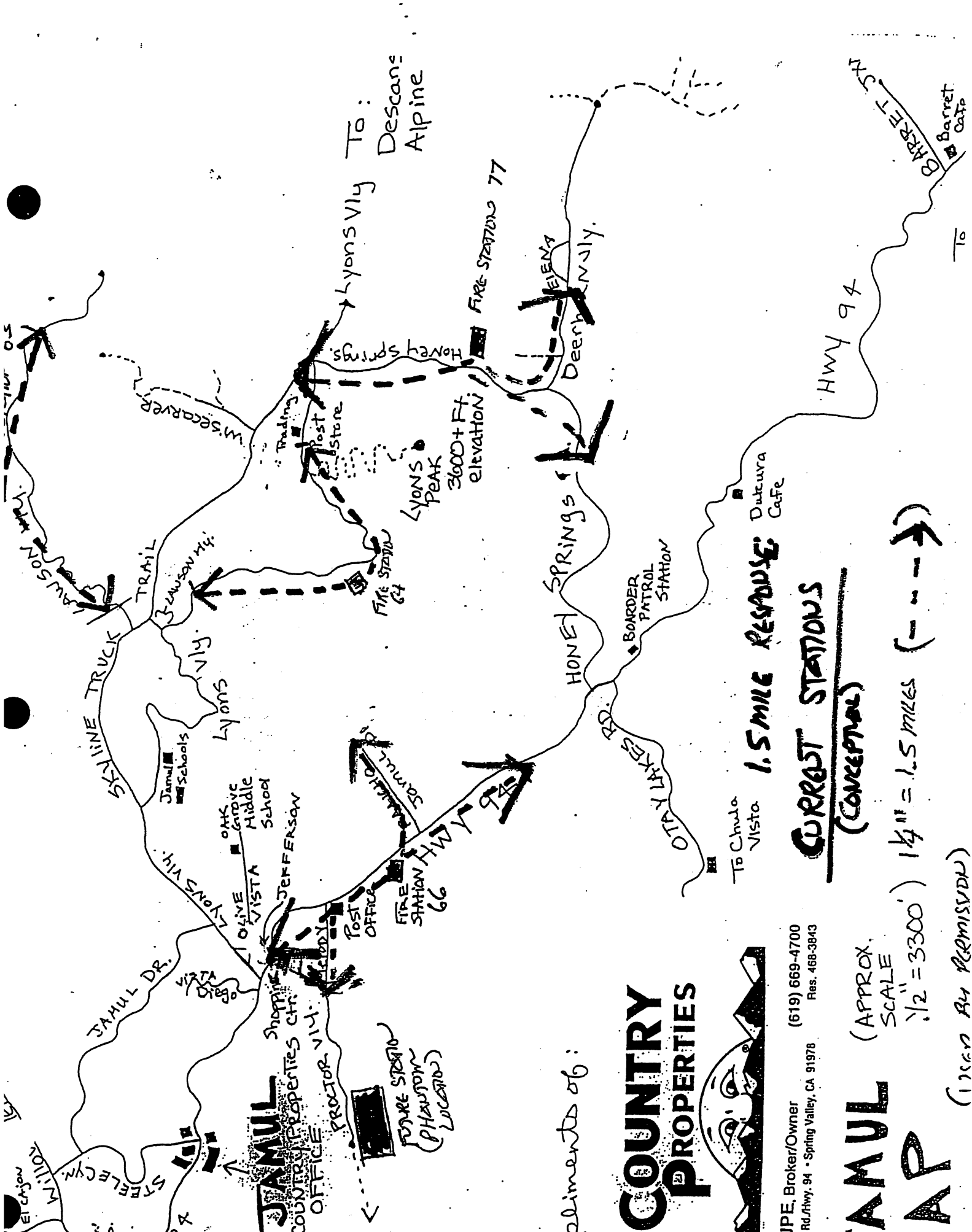
Hwy 94

ACCESS FROM 94



THE MAP ON THE NEXT PAGE SHOWS THE APPROXIMATE 1.5 MILE RESPONSE DISTANCES FROM EACH EXISTING FIRE STATION VIA EXISTING ROADS. 1.5 MILES ARE REACHED IN 3 MINUTES DRIVING AN AVERAGE RESPONSE SPEED OF 30 MPH.

1.5 MILES IS THE STATION LOCATION CRITERIA UTILIZED BY THE INSURANCE SERVICES OFFICE (ISO) WHEN RATING COMMUNITY FIRE PROTECTION.



plements of:

# COUNTRY PROPERTIES



DUPE, Broker/Owner  
 30 Rd./Hwy. 94 • Spring Valley, CA 91978  
 (619) 669-4700  
 Res. 468-3843

To Chula Vista  
 1.5 MILE RESERVE

**CORRECT STATIONS**  
 (CONCEPTUAL)

(APPROX. SCALE  
 1/2" = 3300')

**JAMUL  
 MAP**  
 (ISSUED BY PERMISSIVE)

1 1/4" = 1.5 MILES (- - - ->)

HWY 94

Lyons Vly To:  
 Descans  
 Alpine

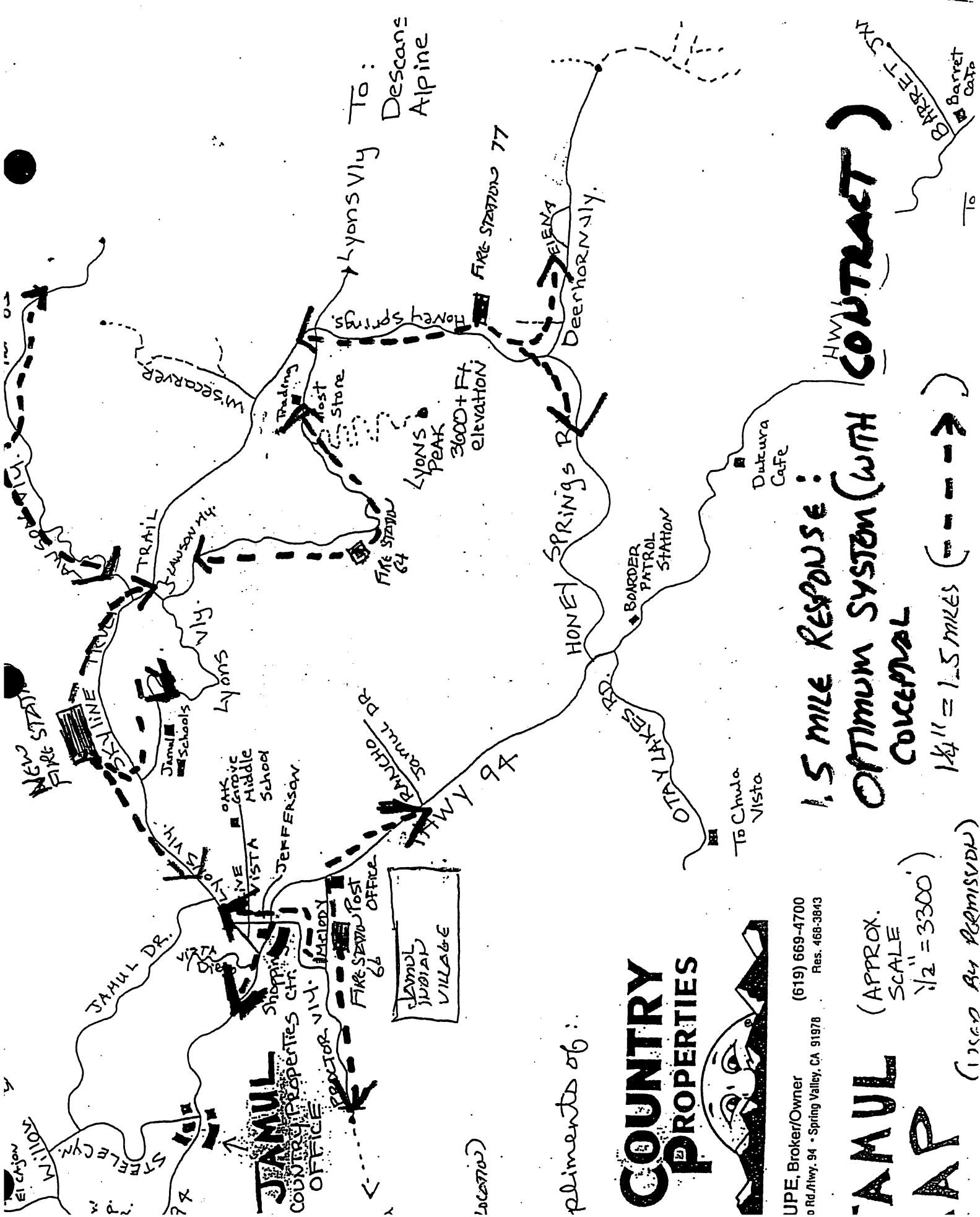
Barret  
 CAPE

To

(ISSUED BY PERMISSIVE)



THE MAP ON THE NEXT PAGE ILLUSTRATES THE APPROXIMATE 1.5 MILE RESPONSE DISTANCES, VIA EXISTING STREETS, FOR THE OPTIMUM SYSTEM IF FIRE PROTECTION IS PROVIDED TO JAMUL INDIAN VILLAGE BY RFPD.



pliments of :

**COUNTRY PROPERTIES**



UPE, Broker/Owner  
 9 Rd./Hwy. 94 - Spring Valley, CA 91978  
 (619) 669-4700  
 Res. 468-3843

**JAMUL AP**

(APPROX. SCALE 1/2" = 3300')

(ISSUED BY PERMISVDW)

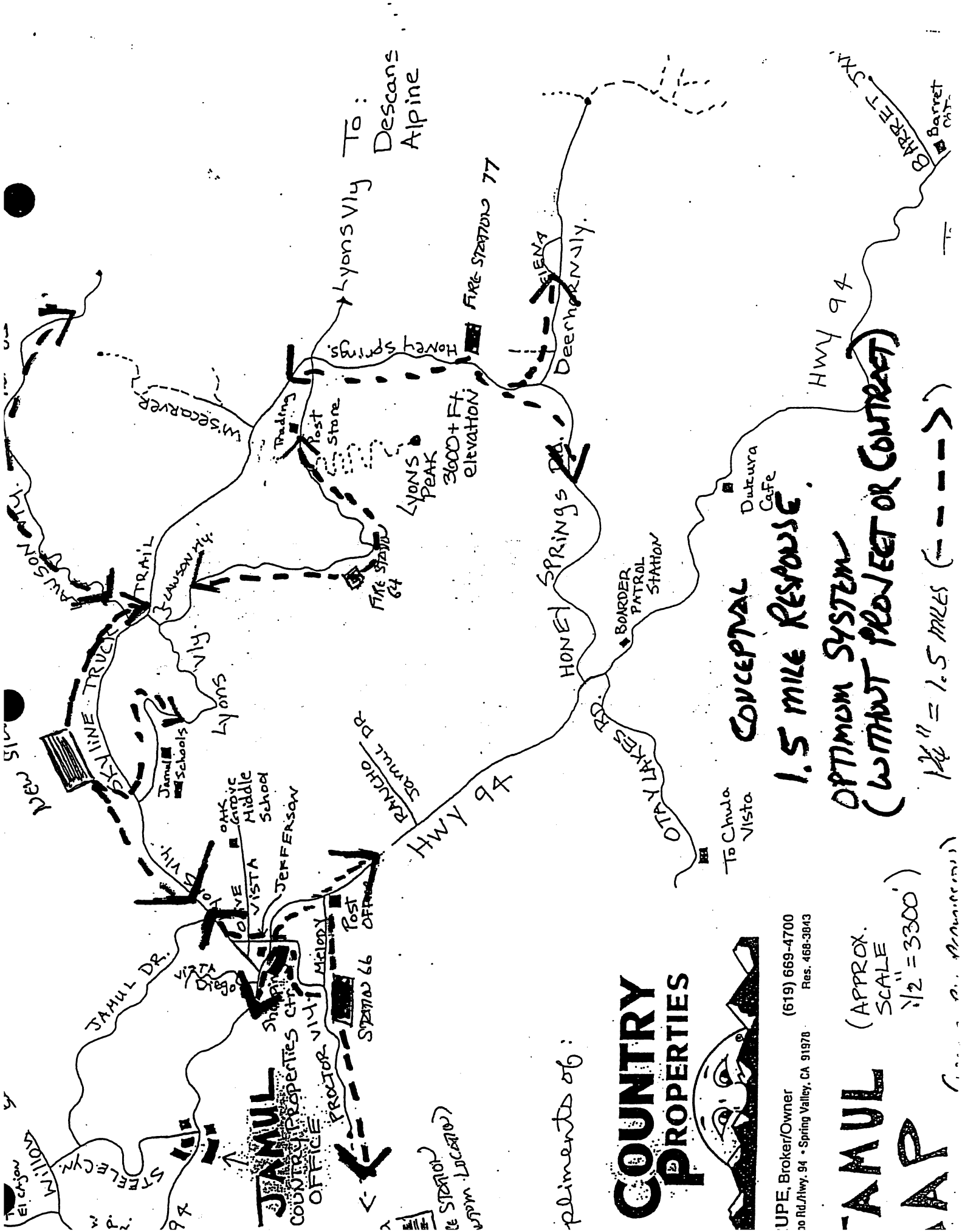
**1.5 MILE RESPONSE : OPTIMUM SYSTEM (WITH CONCERNAL)**

1 1/2" = 1.5 MILES (--->)

**CONTRACT**

To BARRETT CANYON

**The map on the next page illustrates the approximate 1.5 ,mile response distance utilizing the optimum fire station location system without the Jamul Indian Village or without RFPD providing protection to the Jamul Indian Village.**



elements of:

**COUNTRY PROPERTIES**



LUPE, Broker/Owner (619) 669-4700  
 30 Rd./Hwy. 94 • Spring Valley, CA 91978  
 Res. 468-3843

**JAMUL (APPROX. SCALE 1/2" = 3300')**

**CONCEPTUAL OPTIMUM SYSTEM (WITHOUT PROJECT OR CONTRACT)**

1 1/2" = 1.5 MILES (---)

**JAMUL (APPROX. SCALE 1/2" = 3300')**

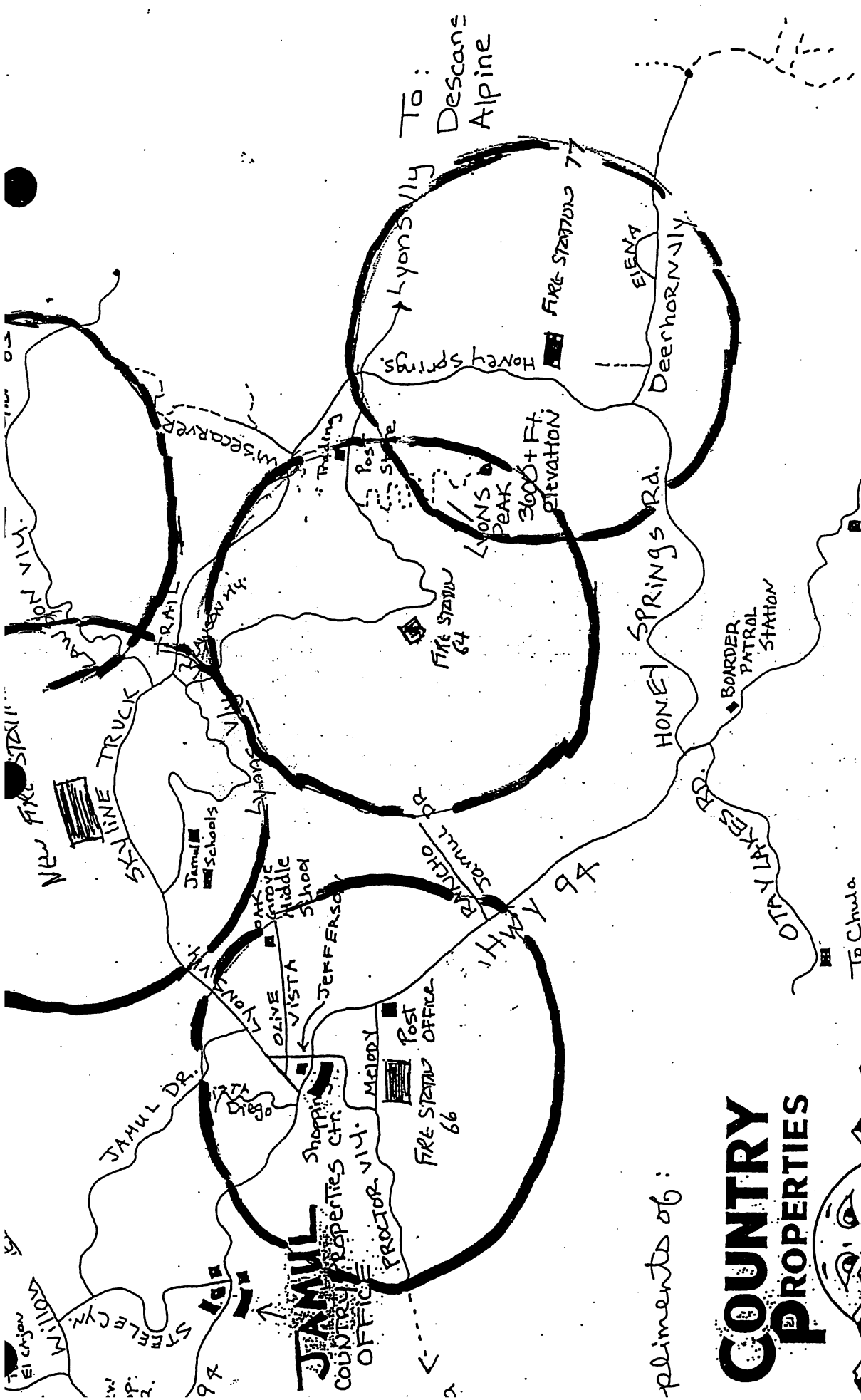
**AP**

HWY 94

Barret City

**THE MAP ON THE NEXT PAGE ILLUSTRATES THE 1.5 MILE RESPONSE DISTANCES FROM FIRE STATIONS FOR THE OPTIMUM SYSTEM WITH RFPD PROVIDING PROTECTION TO THE JAMUL INDIAN VILLAGE.**

The 1.5 miles are shown as a circle. The circles are somewhat academic as they do not account for streets. However, it is obvious where certain gaps in coverage will remain.



**1.5 mile RESPONSE CIRCLES**  
**OF TITUM SYSTEM**  
**WITH CONTRACT (CONCEPT)**

HWY 94

1/4" = 1.5 MILES.

lements of:

**COUNTRY PROPERTIES**



JUPE, Broker/Owner (619) 669-4700  
 po Rd./Hwy. 94 • Spring Valley, CA 91978 Res. 468-3843

**JAMUL** (APPROX. SCALE 1/2" = 3300')

**JAP**

(... ..)

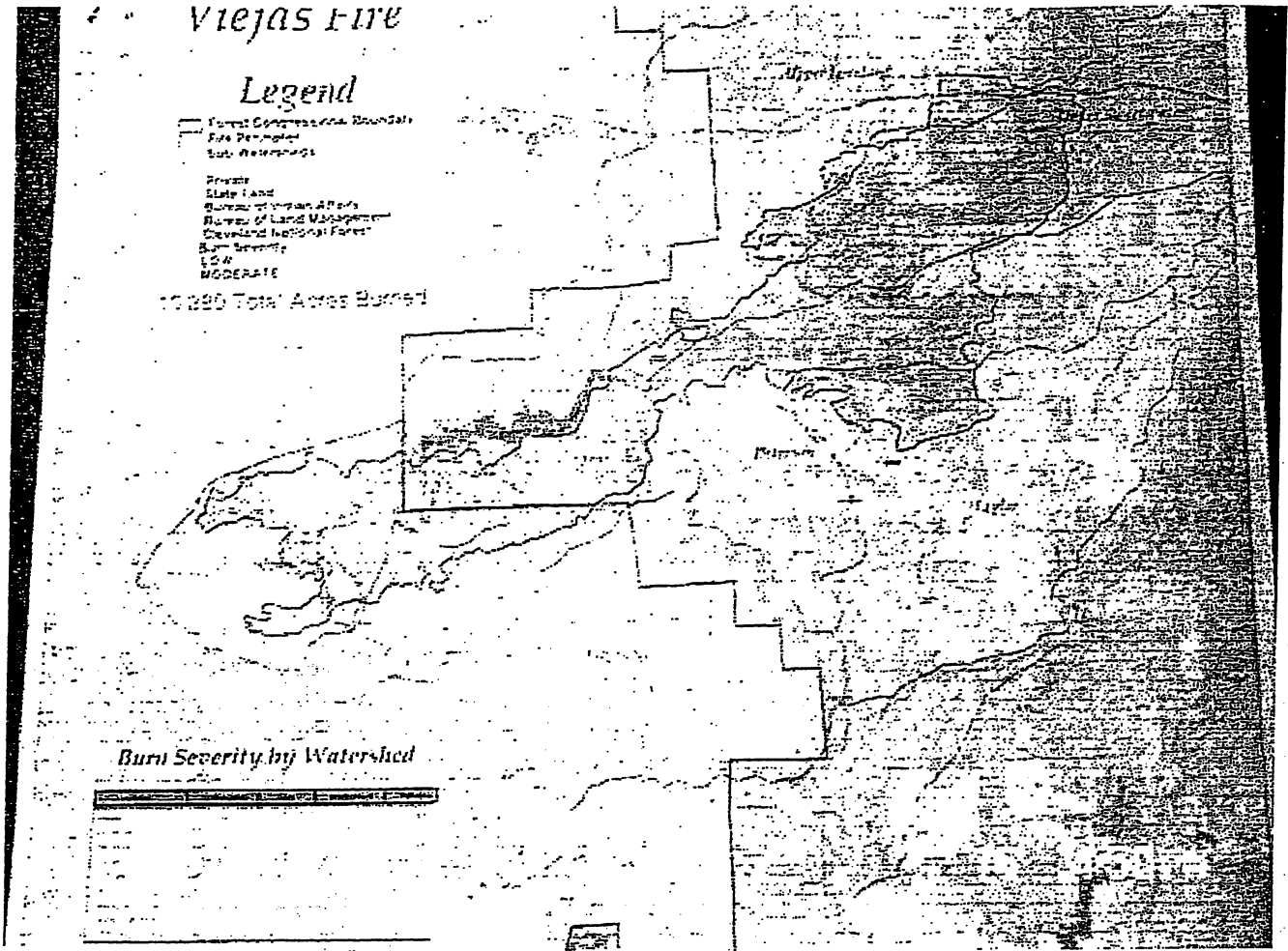
# Viejas Fire

## Legend

- Parcel/County/State Boundary
- - - Fire Perimeter
- Watershed
- Private
- State Land
- Bureau of Indian Affairs
- Bureau of Land Management
- Cleveland National Forest
- Burn Severity:
  - LOW
  - MODERATE

10,880 Total Acres Burned

### Burn Severity by Watershed



# The path of the fire



**EVAUATION LOCATI**  
Centers for evacuees were set up at two Alpine Elementary schools; the Alpine Community Center and at Steele Canyon High School.

**ROAD BLOCK**  
Only residents and casino patrons were allowed through the road block yesterday.

**Interstate 8 Closed Wednesday**

**GLEN OAKS**  
Only residents and casino patrons were allowed through the road block yesterday.

**ALPINE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**VICTORIA**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**ALPINE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**ALPINE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**ALPINE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**ALPINE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**RANCHO PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**RANCHO PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**RANCHO PALO VERDE**  
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**RANCHO PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**RANCHO PALO VERDE**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**ALPINE HEIGHTS**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

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**DEHESA**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

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Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

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**DEHESA**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**DEHESA**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**HIDDEN GLEN**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**HIDDEN GLEN**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**HIDDEN GLEN**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**HIDDEN GLEN**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**HIDDEN GLEN**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**WILLOWS**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**WILLOWS**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**WILLOWS**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

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Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

**THE WILLOWS**  
Rescue animals were taken to Lazy A ranch on 1000 Alpine Blvd.

## Local fire crews

Fire agencies throughout San Diego County have joined in battling the Viejas fire near Alpine. Following are what local agencies have sent:

**City of San Diego:** 6 strike teams, which is 30 engines and brush rigs and 6 battalion chiefs  
**Alpine:** 1 engine  
**Carlsbad:** 2 engines, 1 brush rig, 9 people  
**Ciulla Vista:** 3 engines, 11 people  
**Coronado:** 1 engine, 5 people  
**Del Mar:** 1 engine, 4 people

**East County:** 3 engines, 10 people  
**El Cajon:** 4 engines, 14 people  
**Encinitas:** 2 engines, 1 brush rig, 11 people  
**Escondido:** 2 engines, 1 brush unit, 9 people  
**North County Fire District:** 2 engines, 9 people  
**Lakeside:** 2 engines, 9 people  
**La Mesa:** 3 engines, 12 people  
**Poway:** 2 engines, 7 people  
**San Marcos:** 1 engine, 1 brush rig, 9 people  
**San Miguel:** 7 engines, 2 brush rigs, 29 people  
**Solana Beach:** 1 engine, 3 people  
**Vista:** 1 brush rig, 3 engines, 15 people

**CREATING OBSTACLES**  
Fire crews bulldozed fire lines through the brush to create safety zones.

**RESIDENTS EVACUATED**  
One home on Sycuan Canyon Rd. was among several that burned yesterday.

**ROAD BLOCK**  
Only residents and casino patrons were allowed through the road block yesterday.

**INTERSTATE 8 CLOSED WEDNESDAY**



**“Exhibit B”**



October 27, 2000

Chief Dan McKenna  
14145 Highway 94  
Jamul, CA 91935

Kenneth A. Meza  
Chairman

Dear Chief McKenna:

Carlene A. Chamberlain  
Vice Chairwoman

The Jamul Indian Village has made it clearly known to the fire district and the community of its commitment to provide the land and money to build a new state-of-the-art fire station for the entire valley.

Bill Mesa  
Councilman

Erica M. Pinto  
Councilwoman

As you know, the tribe and the fire district have signed a lease for the use of a specific section of land by the Rural Fire Protection District. Equipment and other property belonging to the fire district is encroaching upon tribal reservation lands for sometime now. In order to stay in accordance with the lease, we ask that this property be removed immediately.

Adolph Thing  
Councilman

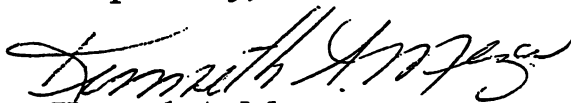
Julia Lotta  
Tribal Administrator

To assist in the process we will be putting up a fence to clearly delineate tribal reservation land from the land that has been designated in the lease for use by the Rural Fire Protection District.

We sincerely hope that the board will move quickly on proceeding forward with the Memorandum Of Understanding so that together we can build a new facility that will help ensure the safety of all residents in Jamul.

Should you have any questions, please feel free to call. Thank you.

Respectfully,

  
Kenneth A. Meza  
Chairman

JAMUL INDIAN VILLAGE

————— A Federally Recognized Tribal Nation —————

**“Exhibit C”**

*Current Lease*

②

LEASE AGREEMENT

This Lease, executed in duplicate at Spring Valley, California, is made as of January 1, 1989, between OTAY WATER DISTRICT, a municipal water district formed under the Municipal Water District Law of 1911, as amended, hereinafter referred to as "Lessor", and JAMUL FIRE DEPARTMENT, a fire company operating pursuant to Health and Safety Code Section 14825 et seq, hereinafter referred to as "Lessee".

It is agreed between the parties hereto as follows:

1. Premises:

1.01 Lessor leases to Lessee and Lessee hires from Lessor, on the terms and conditions in this Lease, that certain portion of a parcel of land, hereinafter referred to as "the leased premises", situated in the County of San Diego, State of California, the legal description of which is set forth in Exhibit "A", attached hereto, and the location of which is shown on the plat map, attached hereto as Exhibit "B", both of which are by this reference incorporated herein.

1.02 Lessor makes no warranty or representation of any kind concerning the condition of the leased premises, their fitness for the use intended by Lessee, or the applicable zoning, and hereby disclaims any personal knowledge with respect thereto, it being expressly understood by the parties hereto that Lessee has personally inspected the premises, finds them fit for their

intended use, accepts them as is, and has ascertained that they can, under existing laws, ordinances, and regulations, be used for their anticipated purposes.

2. Term:

2.01 The term of this Lease is fifteen (15) years from the commencement date.

2.02 Should Lessee fully and faithfully perform all the terms and conditions of this Lease for the full term specified in Section 2.01 of this Lease, Lessee shall have the option to extend this lease for one additional consecutive term of five (5) years, the first of which shall commence on expiration of the term specified in Section 2.01. In order to exercise the option for the additional term, Lessee shall give Lessor written notice of Lessee's desire to extend the term at least 180 days prior to expiration of the term then in effect.

2.03 Should Lessee hold over and continue in possession of said premises after expiration of the term of this Lease or any extension thereof, Lessee's continued occupancy of said premises shall be considered a month-to-month tenancy subject to all the terms and conditions of this Lease.

3. Commencement Date:

3.01 The commencement date of this Lease shall be January 1, 1989.

4. Rent:

4.01 Lessee shall pay to Lessor one dollar, (\$1.00) per year as minimum annual net rent, payable annually in advance.

5. Utilities:

5.01 Lessee shall pay without abatement, deduction or offset the charges for all utilities, including telephones, gas, electricity and water used in or on the leased premises, and for the removal of rubbish from the leased premises, before they shall become delinquent, and shall hold Lessor harmless from any liability therefor. Lessor shall furnish a water meter at no cost to Lessee for service. Lessee shall pay Lessor for quantities of water used through said meter.

6. Uses:

6.01 It is Lessee's intention to use or cause the premises to be used only for purposes of a fire station and uses normally incident thereto.

6.02 Lessee may construct on and affix to the premises only such improvements, fixtures, signs and equipment as are necessary for the intended use of the premises and which comply with all applicable laws, regulations and orders of any governmental agencies and with the provisions of this Lease. Lessee shall obtain Lessor's prior written approval on the plans and drawings for any permanent structures to be constructed on the premises. All such improvements, fixtures, signs and

equipment shall remain the property of Lessee, and, except as otherwise provided herein, may be removed at any time provided that Lessee, at its expense, shall repair any damage caused by reason of such removal. At the expiration of the term of this Lease, Lessor shall have the sole option to determine whether any buildings constructed by Lessee shall be removed. Any such improvements, fixtures, signs and equipment not removed within (30) days after expiration or termination of the Lease terms, at the option of Lessor, shall be deemed abandoned by Lessee and shall thereupon become the absolute property of Lessor without compensation to Lessee.

6.03 Lessee shall not commit, or suffer to be committed, any waste on the leased premises, nor shall it maintain, commit, or permit the maintenance or commission of any nuisance on the leased premises or use the leased premises for any improper, immoral, unlawful or objectionable purpose.

6.04 Lessee agrees to and shall:

(a) Maintain and conduct its business in a lawful manner.

(b) Comply promptly with all federal, state and municipal statutes and ordinances, and with all regulations, orders and directives of appropriate governmental agencies, as such statutes, ordinances, regulations, orders and directives now exist or may hereafter provide concerning the use and safety of

the leased premises, and, at its sole expense, make any repairs, changes, or modifications in, on or to the leased premises required by any of the foregoing.

6.05 Lessee shall repair or replace the perimeter fencing in accordance with District approved standards.

6.06 Lessee shall remove all debris, trash, weeds, grass and clean up the leased premises to the District's satisfaction and Lessee shall maintain the premises in such fashion during the term of the lease.

7. Insurance:

7.01 This Lease is made on the express condition that Lessor is to be free from all liability or loss by reason of injury to any person or property, from whatever cause, while in or on the leased premises or with the improvements or personal property therein or thereon, including any liability for injury to the person or property of Lessee, his agents, officers, and employees; provided, however, that Lessor is not relieved of liability in connection with any damage or injury caused by any act of Lessor or Lessor's agents, servants or employees.

7.02 Lessee agrees to and shall, from the commencement date of this Lease, secure from a good and responsible company or companies doing insurance business in the State of California which are either approved in writing by Lessor or rated "triple A" or better in Best's Insurance Reports, and maintain during the



entire term of this Lease, the following primary insurance coverage for the entire leased premises:

(a) Comprehensive public liability and automobile liability insurance in the minimum amount of \$1,000,000 for loss from an accident resulting in bodily injury to or death of one or more persons, \$1,000,000 for loss from an accident resulting in damage to or destruction of property or, in the alternative, a \$2,000,000 combined single limit policy. Said policy shall specifically insure performance by Lessee of its indemnity agreement set forth in Section 7.01.

(b) Fire and extended coverage insurance in an amount not less than one hundred percent (100%) of the value of the leased premises, any improvements, and of Lessee's fixtures, signs and equipment in or upon the leased premises.

7.03 Lessee agrees that Lessor shall be named as an additional insured on each of the aforementioned policies of insurance.

7.04 Upon securing the foregoing coverages, Lessee shall provide Lessor with written certificates of insurance evidencing such coverages.

7.05 Lessee shall provide proof to Lessor, pursuant to Section 7.04, that each of the policies provided for in this Article expressly provides that the policies shall not be

canceled or altered without at least thirty (30) days prior written notice to Lessor.

7.06 If Lessee at any time during the term of this Lease should fail to secure or maintain the foregoing insurance, Lessor shall be permitted to obtain such insurance in Lessee's name or as the agent of Lessee. Any amounts so paid by Lessor as insurance premiums shall become immediately due and payable as rent by Lessee to Lessor, together with interest on such paid insurance premiums at an interest rate per annum equal to the Federal Discount Rate plus 5% from the date written notice is received that the premiums have been paid until payment thereof by Lessee.

8, Maintenance, Repairs, and Restoration:

8.01 Throughout the term of this Lease, Lessee shall, at Lessee's sole cost and expense, maintain the entire leased premises and all improvements (interior and exterior) in good condition and repair, ordinary wear and tear excepted, and in accordance with all applicable laws, rules, ordinances, orders and regulations of federal, state, county, municipal and other governmental agencies and bodies having or claiming jurisdiction.

9. Construction and Removal of Improvements:

9.01 Construction or restoration of improvements on the leased premises shall be conducted as follows:

(a) Lessee shall accomplish the construction or restoration in a manner that will cause the least inconvenience, annoyance, and disruption at the premises.

(b) On completion of the work Lessor shall immediately record a notice of completion in the county in which the premises are located.

9.02 It is understood and agreed by the parties hereto that Lessee shall have the right at its own cost and expense from time to time during the term to construct on the premises the improvements and make such alterations, additions, and changes therein as are necessary for its purposes as set forth in Article 6, and it shall be permitted from time to time during the lease term to remove any such improvements erected or made by it; provided, however, that it repair any damages to the premises caused by such removal. Lessee covenants and agrees that any such improvements shall be made in a first-class, workmanlike manner and in compliance with all applicable laws and regulations.

10. Mechanics and Other Liens:

10.01 Lessee shall neither permit nor suffer any mechanics liens or other liens to be filed against the leased premises or any part thereof or against Lessee's leasehold interest therein by reason of any work, labor or materials done on or

in or supplied to the leased premises at Lessee's request or at the request of any of Lessee's agents, employees or sublessees.

10.02 Should any such lien be filed, Lessee agrees to and shall cause it to be removed forthwith, provided, however, that should Lessee in good faith desire to contest such lien it may do so but in such case Lessee agrees to and shall indemnify and hold Lessor harmless from any and all liability for damages resulting therefrom and agrees to and shall in the event of a judgment or foreclosure on said lien cause the same to be satisfied, discharged and removed prior to execution of the judgment.

10.03 Should Lessee fail to discharge any such lien or furnish a bond against the foreclosure thereof, Lessor may, but shall not be obligated to, discharge the same or take such other action as it deems necessary to prevent a judgment of foreclosure on said lien from being executed against the property, and all costs and expenses, including reasonable attorney's fees incurred by Lessor, shall be repaid by Lessee to Lessor on written demand therefor.

10.04 Nothing in this Lease shall be construed as in any way constituting a consent or request by Lessor, expressed or implied, by inference or otherwise, to any contractor, subcontractor, laborer or materialman for the performance of any labor or the furnishing of any materials for any specific or general improvement, alteration or repair to the leased premises or to

any buildings or improvements thereon, or to any part thereof. Lessor shall have the right in the event of any construction, alteration, repair or work in or to the leased premises or to any part thereof to post and file such notices of nonresponsibility as are now or shall hereafter be provided by law.

11. Assignment and Subletting:

11.01 Lessee shall not assign this Lease, or any interest therein, and shall not sublet the leased premises or any part thereof, or any right or privilege appurtenant thereto, or suffer any other person (the authorized agents and servants of Lessee excepted) to occupy or use the leased premises, or any portion thereof, without Lessor's prior written consent.

12. Default:

12.01 Each of the following events shall be a default by Lessee and a breach of this Lease:

(a) Failure or refusal to pay when due any rent or any other sum required by this Lease to be paid by Lessee, or to perform as required or conditioned by any other covenant or condition of this Lease.

(b) Abandonment or surrender of the premises or of the leasehold estate. Failure to transmit or receive transmission from the leased premises for a period of fifteen (15) days after default in payment of rent or other obligations imposed upon it by this Lease shall be deemed to constitute a

surrender or abandonment of Lessee's interest in the leased premises and a surrender or abandonment of any personal property left on the leased premises.

(c) The subjection of any right or interest of Lessee to attachment, execution or other levy or to seizure under legal process if not released within fifteen (15) days.

(d) The appointment of a receiver to take possession of the premises or improvements or of Lessee's interest in the leasehold estate or of Lessee's operations on the premises for any reason, including but not limited to, assignment for the benefit of creditors or voluntary or involuntary bankruptcy proceedings.

(e) An assignment by Lessee for the benefit of creditors or the filing of a voluntary or involuntary petition by or against Lessee under any law for the purpose of adjudicating Lessee a bankrupt; or for extending time for payment, adjustment or satisfaction of Lessee's liabilities; or for reorganization, dissolution or arrangement on account of or to prevent bankruptcy or insolvency; unless the assignment or proceeding, and all consequent orders, adjudications, custodies and supervisions are dismissed, vacated or otherwise permanently stayed or terminated within forty-five (45) days after the assignment, filing or other initial event.

(f) Default or delinquency in the payment of any loan secured by a mortgage permitted by this Lease to be placed by Lessee against Lessor's title or the leasehold or both.

12.02 If any default by Lessee shall continue uncured for thirty (30) days, Lessor has the following remedies in addition to all of the rights and remedies provided by law or equity, to which Lessor may result cumulatively or in the alternative:

(a) Lessor may at Lessor's election terminate this Lease by giving Lessee written notice of termination. On the giving of the notice, all Lessee's rights in the leased premises and in all improvements shall terminate. Promptly after notice of termination, Lessee shall surrender and vacate the premises and all improvements in good, clean condition, and Lessor may reenter and take possession of the leased premises and all improvements and eject all parties in possession or eject some and not others or eject none.

12.03 Lessor shall not be considered to be in default under this Lease unless (1) Lessor is given notice specifying the default and (2) Lessor has failed for ten (10) days to cure the default, if it is curable, or to institute and diligently pursue reasonable corrective or ameliorative acts for noncurable defaults. Lessee waives the protections of Section 1932 and 1933 of the California Civil Code.

12.04 No waiver of any default hereunder shall constitute a waiver of any other breach or default, whether of the same or any other covenant or condition. No waiver, benefit, privilege or service voluntarily given or performed by another party shall give the other any contractual right by custom, estoppel or otherwise. The subsequent acceptance of rent pursuant to this Lease shall not constitute a waiver of any preceding default by Lessee other than default in the payment of the particular rental payment so accepted, regardless of Lessor's knowledge of the preceding breach at the time of accepting the rent, nor shall acceptance of rent or any other payment after termination constitute a reinstatement, extension or renewal of the Lease or revocation of any notice or any other act by Lessor.

13. Attorney's Fees:

13.01 In the event that either party hereto shall commence any legal action or proceeding, including an action for declaratory relief, against the other by reason of the alleged failure of the other to perform or keep any term, covenant or condition of this Lease, the party prevailing in said action or proceeding shall be entitled to recover, in addition to its court costs, expert witness fees and a reasonable attorney's fee to be fixed by the court, and such recovery shall include court costs and attorney's fees on appeal, if any. As used herein, "the



prevailing party" means the party in whose favor final judgment is rendered.

14. Miscellaneous:

14.01 It is understood and agreed by the parties hereto that Lessor reserves and shall have the right by itself or by its agents or employees to enter the leased premises at any and all reasonable times to inspect the leased premises and to exercise such rights and obligations as are granted or required of it by this Lease or by law.

14.02 Except as otherwise specifically provided in this Lease, all notices and demands herein required to be given by Lessor to Lessee or by Lessee to Lessor shall be in writing and delivered in person or by registered or certified mail or by telegraph.

(a) Notices and demands delivered to Lessor by mail or telegraph shall be addressed to it at:

Otay Water District  
10595 Jamacha Boulevard  
Spring Valley, CA 92078  
Attn: General Manager

(b) Notices and demands delivered to Lessee by mail or telegraph shall be addressed to it at:

Jamul Fire Department  
Post Office Box 521  
Jamul, CA 92035

(c) Any such notice or demand shall be deemed served at the time of delivery if delivered in person, or on the

business day following deposit thereof in the U.S. mail where sent by registered or certified mail, or on notification of delivery by the telegraph company where sent by telegraph.

14.03 The terms, covenants and conditions of this Lease shall apply to and bind the heirs, executors, administrators, successors and assigns of the parties hereto, and all of the parties hereto shall be jointly and severally liable hereunder.

14.04 Time is hereby expressly declared to be of the essence of this Lease and all the covenants, agreements, conditions and obligations herein contained.

14.05 This Lease contains the entire agreement between the parties relating thereto. All prior negotiations or stipulations concerning its matter which preceded or accompanied the execution hereof are conclusively deemed to be superseded hereby, provided, however, that this Lease may in the future be altered by written agreement of the parties or by an executed oral agreement and not otherwise.

14.06 If any provision of this Lease shall be declared invalid or unenforceable, the remainder of the Lease shall continue in full force and effect.

Executed as of January 1, 1989, at Spring Valley,  
California.

LESSOR:

OTAY WATER DISTRICT

By: Mitchell K. Coley  
General Manager

LESSEE:

JAMUL FIRE DEPARTMENT

By: Jim Basnell  
Jim Basnell Chief

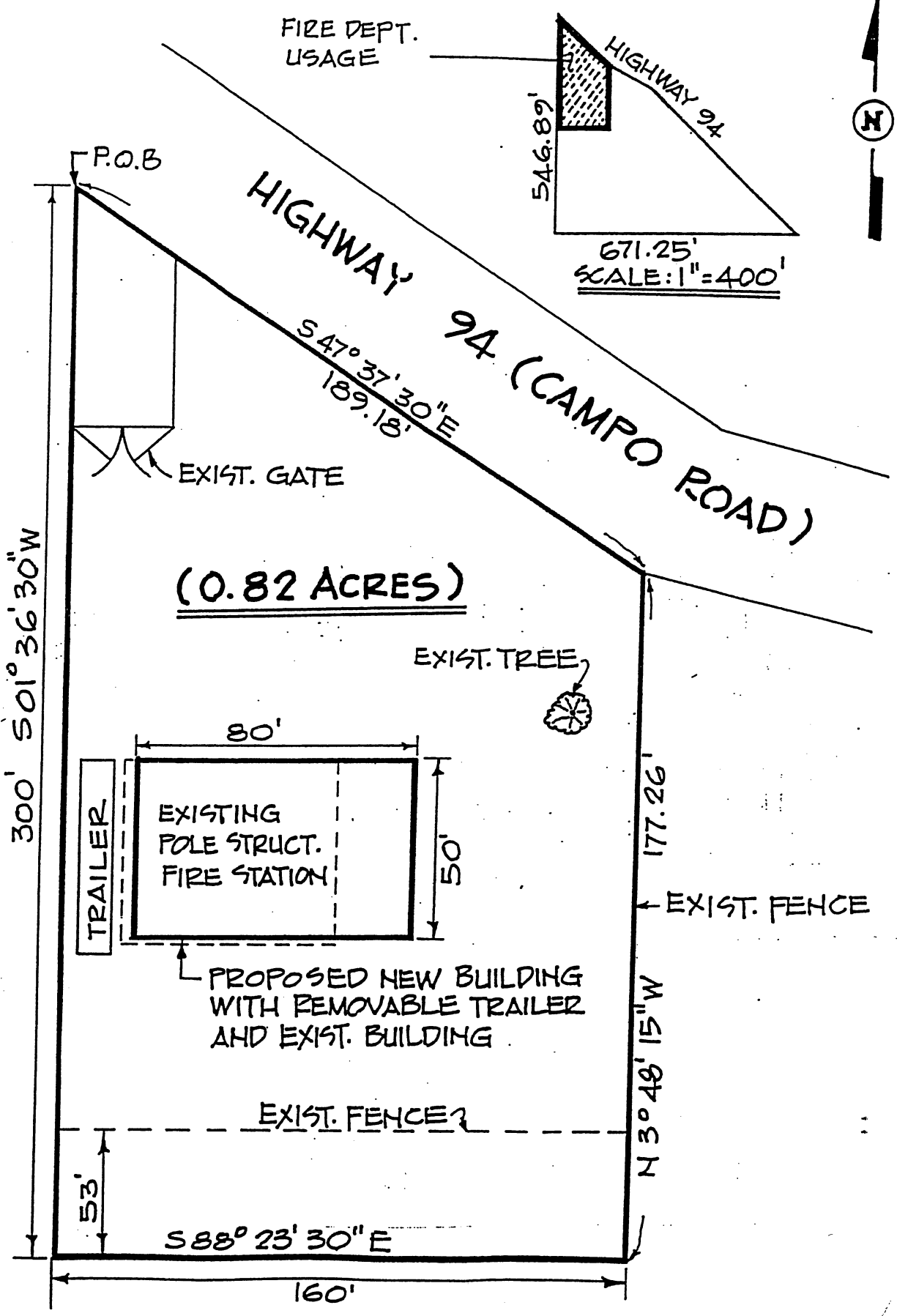
By: Patricia L. Turner  
Patricia L. Turner, Chairman  
Bd of Directors

LEGAL DESCRIPTION

All that portion of the Fractional Southwest Quarter of Section 10, Township 17 South, Range 1 East, San Bernardino Meridian according to the United States Government Survey thereof in the County of San Diego, State of California, more particularly described as follows:

Beginning at the Northwest corner of that parcel of land granted to Otay Municipal Water District in document recorded January 27, 1976 as File/Page 76-024996 of Official Records, filed in the Office of the County Recorder of San Diego County, said corner being on the Southwesterly line of Highway Route 16, Division 2 also known as Campo Road and State Highway 94; thence South  $01^{\circ}36'30''$  West, along said West line of said Otay's land 300.00 feet; thence South  $88^{\circ}23'30''$  East, 160.00 feet; thence North  $3^{\circ}48'15''$  West, 177.26 feet to the Southwesterly line of said Campo Road, thence North  $47^{\circ}37'30''$  East, along said Southwesterly line 189.18 feet to the Point of Beginning.

Containing 0.82 Ac.



# JAMUL FIRE DEPARTMENT LEASE

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11

P. O. BOX 85406, MS 50  
SAN DIEGO, CA 92186-5406  
PHONE (619) 688-6954  
FAX (619) 688-4299  
TTY (619) 688-6670



*Flex your power!  
Be energy efficient!*

September 30, 2002

Ms. Chantal Saipe  
County of San Diego  
Tribal Liaison  
1600 Pacific Highway, Rm. 212/MS A-6  
San Diego, CA 92101

Dear Ms. Saipe,

The California Department of Transportation (Department) appreciates the opportunity to have reviewed the Update on Impacts of Tribal Economic Development Projects in San Diego County. We have the following comments in response to certain sections of the document:

- Pg. 89, Section 4.2.3, "Caltrans is currently evaluating the feasibility of other interim/phased projects that can accommodate the anticipated traffic volumes without full widening to four lanes".

It should be noted the Department's March, 2002 Transportation Concept Report shows a 2020 Concept of four lanes on State Route 76 from Interstate 15 to the east boundary of the La Jolla Indian Reservation.

- Pg. 91, Section 4.3.4, "Road capacity needs for State Highways were identified by estimating the Highway Capacity Manual (HCM) Level of Service (LOS) for the existing and projected traffic volumes."

Clarification needs to be made that the County of San Diego used the HCM methodology. The Department did not use the HCM method for calculating LOS.

- Pg. 98, general comment ---

The final Tribal Report should include a more thorough discussion based on the Preliminary Draft Mobility 2030 Transportation Plan for the San Diego Region (August 2002) which is now available.

- Pg. 100, Section 4.10.2.3 --- SANDAG's 67/125 Corridor Study (June 2002) was released August 8<sup>th</sup>.

The recommended improvements to State Route 67 are listed on page 3 and 4 of the SANDAG'S 67/125 Corridor Study (June 2002) and should be summarized in this section of the Tribal Report.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11

P. O. BOX 85406, MS 50  
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*Flex your power!  
Be energy efficient!*

Ms. Chantal Saipe  
September 30, 2002  
Page 2

- Pg. 100, Section 4.10.2.1

In reference to the SR- 94 non-capacity increasing operation improvement project, it is assumed that studies, preliminary design and environmental processing (EIS/E.R) would be complete in 6 to 7 years. Design, Right of Way acquisition and Construction would follow if funding could be found for this project

- Pg. 27-28, Table 3 ---

Clarification is required in that, Table 3 based on the 100 trips/1000 Square Foot of Gaming Area. Additionally, it should be noted that the Department compared the "Baseline ADT with Permanent Projects" numbers with the numbers in the same table of the November 2000 report. As to be expected there were some slight ADT differences, but in all cases, the differences did not cause any Level of Service changes based upon the methodology utilized by us. It also appears that Table 3 is missing a Segment on SR- 94 from Kenwood Drive to Avocado Blvd (Segment 14).

- Pg. 42, Table 4 ---

Segment 14 is missing from table 4.

As discussed in our last telephone conversation Department will send the County our project estimates as soon as possible. In addition, I hope that the above comments can be of some use while revising the final draft of the Tribal Report. If you have any questions please contact me at (619) 688-6955.

Sincerely,

A handwritten signature in black ink, appearing to read "Mario H. Orso".

MARIO H. ORSO  
District 11 Native American Liaison

Charles D. Grimm  
Director of Planning and Building  
Planning Division  
(760) 839-4671, FAX (760) 839-4313



**CITY OF  
ESCONDIDO**

201 NORTH BROADWAY  
ESCONDIDO, CA 92025

September 17, 2002

Chantal Saipe  
Tribal Liaison  
1600 Pacific Highway, Room 212 / MS A-6  
San Diego, CA 92101

RE: Comments on Draft Report: Update on Impacts of Tribal Economic Development Projects in San Diego County

Dear Ms. Saipe:

We appreciate the opportunity to review the draft report on the impact of tribal economic development projects in the County. The report provides a valuable historical overview of the complex land ownership issues affecting reservations as well as a comprehensive summary of existing and proposed projects on tribal lands throughout the County.

The City of Escondido has been monitoring the economic development projects on tribal lands that have the potential for offsite impacts affecting the circulation and infrastructure improvements within the City limits and surrounding General Plan area. Specifically, development projects proposed by the San Pasqual Band of Mission Indians on the San Pasqual Reservation are of particular interest to the City, due to the location of some tribal lands within the Lake Wohlford watershed and the reservation's primary access via Valley Center Road and Lake Wohlford Road. We offer the following comments in the interest of furthering the ongoing communication and cooperation among the City, County and tribal leaders.

1. Traffic

- a. Cooperative Agreement - The report makes numerous references to the Cooperative Agreement executed between the San Pasqual Band and the County Board of Supervisors to mitigate traffic impacts. The agreement is intended to define the tribe's financial obligation toward improvements along

Lori Holt Pfeiler, Mayor  
June Rady, Mayor Pro Tem  
Tom D'Agosta  
Ed Gallo  
Marie Waldron



Lake Wohlford and Valley Center roads for both the interim and permanent casino projects, including circulation improvements within the City of Escondido. It is important to note that the City of Escondido was not consulted regarding the potential improvements and financing as specified in the agreement and the resulting environmental document, and did not authorize the County to negotiate terms on its behalf.

- b. Traffic Needs Assessment - We are unable to determine whether the proposed improvements and associated financial contributions are adequate to mitigate the offsite impacts, since the Traffic Needs Assessment (Appendix C) fails to assess circulation impacts within the incorporated areas. Specifically, the exhibit showing trip distribution in the Year 2020 for the San Pasqual Reservation indicates that 63% of the traffic will impact Lake Wohlford Road as it enters the City of Escondido. Given this high volume projected to impact Valley Center Road within the City of Escondido, we recommend that the analysis should be expanded to evaluate impacts on the regional circulation system, regardless of corporate boundaries.
- c. Trip Generation Rates – We support the County’s recommendation to establish accurate trip generation rates for casinos to be included in SANDAG’s Work Program, and to include each tribe’s proposed near and long range projects to be included in the regional growth and transportation forecasts.

## 2. Community Character / Aesthetics

Based on our experience in reviewing the environmental assessments for the developments proposed on the San Pasqual Reservation, we concur with the discussion in Section 5.3 regarding the general inadequacy of the information and analysis pertaining to the community character and aesthetic issues of some tribal development projects. It has also been our experience that coordination with affected cities is not initiated early enough in the process to provide meaningful input. Regarding the recommendation in Section 5.3.1 Future Considerations, we recommend adding language to encourage tribes to initiate early consultation with the affected cities for the purpose of gathering input on proposed projects. Additionally, we recommend adding a second bullet to encourage the tribes to provide the same level of detail typically required for a development application with the City or County in order to adequately evaluate project impacts and to support the conclusions.

Ms. Chantal Saipe  
September 17, 2002  
Page 3 of 3

3. Water Rights

Section 6.7 discusses the San Luis Rey Water Rights Settlement Act, which involves the City of Escondido. We recommend that Section 6.7.1 Future Considerations be revised to include consultation with the City of Escondido to coordinate land use, conservation and infrastructure plans.

In conclusion, we feel that the draft report provides valuable information and recommendations aimed at balancing tribal economic development goals with community concerns. We appreciate the County's efforts to prepare this comprehensive overview of tribal development projects and to take the lead in coordinating a strategy for cooperation among all affected groups. We look forward to receiving copies of any future reports when they become available, and to participating in any future meetings to discuss infrastructure improvements affecting the City of Escondido.

If you have any questions or would like to schedule any meetings with City staff, please call Barbara Redlitz at (760) 839-4546.

Sincerely,



Charles D. Grimm  
Director of Planning and Building

cc: Mike Adams, Assistant City Manager  
Patrick Thomas, Public Works Director  
Jack Hoagland, Utilities Manager



# California Integrated Waste Management Board

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Linda Moulton-Patterson, Chair  
1001 I Street • Sacramento, California 95814 • (916) 341-6000  
Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025  
[www.ciwmb.ca.gov](http://www.ciwmb.ca.gov)

Gray Davis  
Governor

Winston H. Hickox  
Secretary for  
Environmental  
Protection

September 11, 2002

Tribal Liaison  
1600 Pacific Highway, Room 212  
San Diego, CA 92101

**RE: Draft Update on Impacts of Tribal Economic Development Projects in San Diego County**

This update contains good information regarding the local economic impacts of tribal economic development projects in San Diego County, especially as regards to employment. However, in Chapter 5, "Impacts on Other County Resources and County Programs and Services," there is no mention of the impacts from increased waste generation from the economic development, on either tribal waste management systems, or the County's. This should be addressed in the final document.

Thank you for the opportunity to comment on this update. If you have any questions, you can contact me at (916) 341-6248; or e-mail me at: [ccardoza@ciwmb.ca.gov](mailto:ccardoza@ciwmb.ca.gov).

Catherine L. Cardozo  
Integrated Waste Management Specialist, Technical Senior  
Diversion Planning and Local Assistance Division  
California Integrated Waste Management Board

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California Environmental Protection Agency

Printed on Recycled Paper

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web site at <http://www.ciwmb.ca.gov/>.