



Chris Silva <rcsilvmac@gmail.com>

Re: 3840 Deer Valley Court

Chris Silva <rcsilvmac@gmail.com>

Fri, Oct 31, 2025 at 12:05 PM

To: "Karen L. Garner" <Karen.L.Garner@edcgov.us>

Cc: Supervisor Parlin <bosfour@edcgov.us>, David A Livingston <david.livingston@edcgov.us>

Director Garner (CC: Supervisor Parlin, Counsel Livingston):

Please see the letter below regarding 3840 Deer Valley Court. We're asking, at a minimum, that the County requires objective, off-site access and wildfire egress standards be applied to this R-2.1 facility in SRA before any grading or building permits are issued. This is not a land-use appeal, just a ministerial, objective standards requirement to ensure concurrent emergency ingress and civilian evacuation before any permits are issued.

Chris Silva

Spokesperson, Rescue Deer Valley

(916) 765-0039, rcsilvmac@gmail.com

Re: 3840 Deer Valley Court — Enforce Objective, Off-Site Fire-Access & Wildfire Ingress/Egress Standards for an R-2.1 Facility in SRA (APN: 102-200-042)

Director Garner:

Rescue Deer Valley strongly opposes the commercial substance-use disorder (SUD) treatment facilities proposed by Native Directions off Deer Valley Road in Rescue, and we continue to monitor all related actions.

We understand the court has directed the County to process the 3840 Deer Valley Court grading and building permits ministerially. Ministerial processing removes discretionary land-use review but does not relieve the County of its duty to enforce objective, pass/fail safety standards governing off-site access and wildfire ingress/egress before permits issue. 3840 Deer Valley Ct lies off Deer Valley Road, adjacent to the only access serving a neighborhood of ~20 homes (Rough Ridge/Deer Valley Ct). The applicant identifies R-2.1 (24-hour supervised residential care) for 30+ occupants. The parcel and approach are part of the Very High Fire Hazard Severity Zone (VHFHSZ) in the State Responsibility Area (SRA).

We request the following:

1) Require a continuous, code-compliant apparatus route along Deer Valley Road (SRA)

For an R-2.1 facility, an approved fire-apparatus access road must be continuous from the public way to the building and comply with California Fire Code (CFC) §503: unobstructed 20-ft minimum clear width, required vertical clearance, compliant turning/grades/turnarounds, and bridges engineered and posted for apparatus loads; plus hydrant-zone widening with No-Parking/Fire-Lane controls where applicable.

Because the parcel/approach are in SRA, the State Minimum Fire Safe Regulations (14 CCR, Subchapter 2) apply to roads used for access to new development, including two 10-ft lanes (20 ft total), objective grade/curve limits, required turnouts/turnarounds, and engineered bridge/culvert capacity with posting. Given the sub-20-ft segments and single-lane bridge on Deer Valley Road, the County should require the applicant to widen, engineer, certify, and (where applicable) post the off-site approach and bridge on Deer Valley Rd to meet CFC §503 and 14 CCR Subchapter 2 before any permits are issued or construction commences.

2) Require Appropriate Wildfire egress (off-site only)

This parcel sits between the only evacuation routes for roughly twenty homes. During a recent mandatory wildfire evacuation (Valley Fire, Sept. 1, 2025), congestion and blockage by sightseers were documented in this location, even for that very limited fire. Under CFC §503.1.2, the Fire Code Official may require more than one fire-apparatus access

road where a single route may be impaired by congestion, terrain, or similar conditions—circumstances present here. Accordingly, for an R-2.1, 30+-occupant facility in SRA, we request either:

- a second, remote access road serving the facility that is independent of the existing choke point; or
- demonstrated full compliance with 14 CCR Subchapter 2 along the entire existing approach (two 10-ft lanes/20 ft total, required turnouts/turnarounds, objective grade/curve limits, and bridge/culvert design and posting) sufficient to allow concurrent emergency ingress and civilian evacuation.

3) Summary

As stated above, Rescue Deer Valley is requesting the County enforce the following administrative steps (ministerial, pass/fail) for the commercial R-2.1 facility proposed on Deer Valley Ct before granting any grading or construction permits:

- Issue a completeness checklist requiring CFC §503 apparatus-road plans proving a continuous compliant route (20-ft width, vertical clearance, turning, grades, turnarounds, bridge design/posting; hydrant-zone controls) and 14 CCR Subchapter 2 exhibits (20-ft two-lane access, grades/curves, turnouts/turnarounds, bridge/culvert certification) along Deer Valley Road to the site.
- Withhold permits unless and until the entire approach route, including the single-lane bridge, is widened/engineered and posted to meet standards, and withhold final/CO until field inspection/clearance by DOT and the Fire Authority Having Jurisdiction confirm completion.
- If any off-site work occurs in County right-of-way, require an Encroachment Permit (El Dorado County Code Ch. 12.08) with DOT Standard Conditions.

Applying these external, objective requirements to the full approach route is essential to protect residents, patients, first responders, and neighbors—especially given the existing choke points on the only access to this site. These requests meet the ministerial legal requirement for this CCE grant funded project.

Sincerely,

Chris Silva

Spokesperson, Rescue Deer Valley