

O-6.4 REAX

- O-6.4-1** The comment is an introduction to comments that follow. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-2** The comment provides background information that restates information contained in the Fire Protection Plan for Otay Ranch Village 14 and Planning Areas 16 and 19 (Fire Protection Plan), Appendix 3.1.1-2. Specifically, Section 2.2.2, Climate, provides an analysis of the existing conditions of the Project Area. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-3** The comment provides background information that partially restates information contained in the Fire Protection Plan, Appendix 3.1.1-2, Section 2.2.6, Fire History. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-4** The County acknowledges the comment as an introduction to comments that follow. Please refer to **Responses to Comments O-6.4-5** through **O-6.4-8**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-5** The comment restates information contained in Appendix 3.1.1-2, Fire Protection Plan. Specifically, Section 1.2, Applicable Code/Existing Regulations, describes the Proposed Project's location within a VHFHSZ. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-6** The comment summarizes information provided on the California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program (FRAP) Fire Threat Map. The Fire Threat Map was produced to inform the National Fire Plan, and 2010 is the last published map version (CAL FIRE 2010). The Fire Threat Map includes coarse fire environment data and is not relied on for determining whether a project is required to include ignition-resistant building materials and methods.

The Fire Protection Plan, Appendix 3.1.1-2 (page 2) of the Draft EIR, refers to the CAL FIRE FRAP Fire Hazard Severity Zone Maps, which are more detailed maps that include a finer level of evaluation. Appendix 3.1.1-2 identifies the Proposed Project as occurring within a VHFHSZ. This designation indicates that the area

includes a fire environment that is conducive to periodic wildfires, but does not consider fire reduction activities like conversion of fuels with development or fuel modification zones.

Based on its location in a VHFHSZ, the Proposed Project would be required by the 2016 San Diego County Consolidated Fire Code and the 2016 County Building Code to provide for a level of planning, ignition-resistant construction, access, water availability, fuel modification, and construction materials and methods that have been developed specifically to allow safe development within these areas. The Proposed Project meets and exceeds these requirements and, therefore, is consistent with General Plan Policy S-3.6, Fire Protection Measures. The Fire Threat Map is not utilized for indicating whether a project will be subject to these effective ignition-resistant measures, so it is not referenced in Appendix 3.1.1-2, Fire Protection Plan.

O-6.4-7 The comment expresses that the CPUC fire threat mapping is focused on identifying areas where the wildfire threat warrants additional electrical transmission line and related facility fire safety regulations. The CPUC mapped the fire threat throughout California to determine where it was most appropriate to apply more restrictive fire safety measures for energy projects, with a goal of reducing the potential for fire starts. There are no additional applications of this fire threat mapping to residential development projects. Further, the results of CPUC's fire threat mapping are consistent for the Project Area with the FRAP Fire Hazard Severity Zone Map referred to in Appendix 3.1.1-2, Fire Protection Plan, and the Draft EIR warrants no update on this issue. The Draft EIR, Section 3.1.1.2.4, Wildfire Hazards, describes the fire risks associated with the Proposed Project and indicates that electrical transmission lines would be buried, and would, therefore, not increase the risk of wildfire ignitions associated with above-ground utility lines.

O-6.4-8 The County acknowledges that the comment summarizes the information provided in **Comments O-6.4-4 through O-6.4-7**. The County agrees that the Project Area is within an area identified as having the potential to be exposed to wildfire, as described on page 3.1.1-24 of the Draft EIR (emphasis added):

Given the history of wildfire in the vicinity, including the 2007 Harris Fire that burned through the Project Area, combined with topography, vegetation, climate, nearby ignition sources, and anticipated fire behavior, *the Project Area, in its current condition, is considered to be vulnerable to wildfire ignition and spread* during extreme fire weather.

- Please refer to **Responses to Comments O-6.4-4 through O-6.4-7**. To address the potential for wildlife hazard, a Fire Protection Plan and Wildland Fire Evacuation Plan (Appendices 3.1.1-2 and 3.1.1-3 of the Draft EIR, respectively) were prepared for the Proposed Project. Please refer to **Thematic Response – Wildfire Protection and Evacuation** for an explanation of the fire protection measures proposed or required for the Proposed Project to address wildfire hazards. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-9** The County notes that the comment (Figure 1) is the FRAP Fire Threat Map that is described in **Comment O-6.4-6**. Please refer to **Response to Comment O-6.4-6**. The information provided by the comment is consistent with information contained in Appendix 3.1.1-2 of the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-10** The County notes that the comment (Figure 2) is the CPUC Fire Threat Map described in **Comment O-6.4-7**. Please refer to **Response to Comment O-6.4-7**. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-11** The comment provides background information that restates information contained in Draft EIR, Section 2.2.2, Climate, of Appendix 3.1.1-2. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-12** The comment restates the wind speed input variables used in fire behavior modeling efforts conducted in support of the Draft EIR, Appendix 3.1.1-2, and states that applying a conventional gust factor to a 40-mile-per-hour (mph) 10-minute average wind speed would result in gust speeds of 50 to 60 mph (higher than the 50 mph value used in the Appendix 3.1.1-2 analysis). No definition of a conventional gust factor is provided, so the commenter's conclusions cannot be verified. However, the wind inputs used in support of Appendix 3.1.1-2 (50 mph) exceed those established by the County of San Diego, Planning & Development Services. The County developed guidelines and standards for weather inputs to be used in fire behavior modeling for development projects proposed in the County (see the County's Report Format and Content Requirements, Wildland Fire and Fire Protection (2010)). Given the Proposed Project's location, County standards would require a peak condition wind input speed of 41 mph for fire behavior modeling. The use of 50 mph for fire behavior modeling is, therefore, considered more conservative than other regionally accepted standards.

The comment also states that the San Miguel remote automated weather station (RAWS) was used to analyze weather data to support the fire behavior modeling conducted for the Draft EIR, Appendix 3.1.1-2, and suggests that the Otay Mountain RAWS would better characterize wind speeds experienced for the Project Area, given its ridgetop location. The San Miguel RAWS was selected given its proximity and mid-slope location along the northwest side of Mother Miguel Mountain, a similar geographic setting to the Project Area, which is primarily situated mid-slope along the northwest side of the Jamul Mountains. The elevation of the San Miguel RAWS (425 feet) is also more closely aligned with the Project Area (600 to 1,300 feet) than the Otay Mountain RAWS (3,283 feet). Additionally, ridgetops typically exhibit higher wind speeds than mid-slope or valley bottom locations, so wind speeds recorded at the Otay Mountain RAWS are likely higher than would be experienced for the Project Area. In addition, wind speed values used for fire behavior modeling efforts (50 mph) in Appendix 3.1.1-2 are considered conservative, since they exceed the 97th percentile values calculated from the San Miguel RAWS (40 mph).

- O-6.4-13** The comment provides background information regarding fuels, and restates information contained in the Draft EIR, Section 2.2.3, Fuels (Vegetation); Section 2.2.4, Fuel Loads; and Section 2.2.5, Vegetation Dynamics, of Appendix 3.1.1-2. In addition, Appendix 3.1.1-2, Fire Protection Plan, describes the climax fuel conditions were used in the modeling to represent the worst-case wildfire scenario. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-14** The comment restates that Draft EIR Appendix 3.1.1-2, Fire Protection Plan, used vegetation mapping data for only the Project Area when performing fire behavior modeling, and states that off-site vegetation should be considered when analyzing the effect of the Proposed Project on adjacent wildland or wildland/urban interface areas. The intent of the Fire Protection Plan is to “to provide fire planning guidance and requirements for reducing fire risk and demand for fire protection services associated with the Proposed Project” (page 2 of Appendix 3.1.1-2). In other words, the Fire Protection Plan is intended to outline measures to protect the Proposed Project from adjacent wildland fire hazards. A discussion of the wildfire risk of the Proposed Project on adjacent wildland areas is presented in the Draft EIR (Section 3.1.1.2.4, Wildfire Hazards). Section 3.1.1.2.4, Wildfire Hazards, discusses that, in addition to existing fire protection services for the area, the proposed fire station within the Project Area would reduce the response times to wildfire ignitions and increase the likelihood of successful initial attacks that would limit the spread of a wildfire. The Fire Protection Plan analysis did focus on the area directly adjacent to the Project

Area (within the first 300 feet), which represents the area that most affects a community. Please refer to Appendix 3.1.1-2, Sections 2.2.1, 2.2.3, and 2.2.4, and Figure 5 that state/illustrate that fuels, fuel loads, and terrain within 300 feet of the Development Footprint were evaluated as part of the fire environment assessment and fire behavior modeling.

The comment also presents a discussion of its own Wildlife Habitat Relationships vegetation mapping data (presented as Figure 4b), noting the presence of chaparral and sage scrub vegetation and the contribution of chaparral to the area's fire history. The presence of chaparral and sage scrub vegetation in the Project Area is consistent with the information provided in Appendix 3.1.1-2 of the Draft EIR.

- O-6.4-15** The comment (as Figures 3 and 3b) provides background information that is consistent with information contained in the Draft EIR, specifically, Section 2.2.6, Fire History, and Appendix B, Fire History Exhibit, of Appendix 3.1.1-2. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-16** The comment (as Figure 4a) restates information contained in the Draft EIR, specifically, Sections 2.2.3, 2.2.4, and 2.2.5 (Fuels, Fuel Loads, and Vegetation Dynamics) and Figure 4 of Appendix 3.1.1-2 of the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-17** The comment (as Figure 4b) provides background information that is consistent with information contained in the Draft EIR, specifically, Sections 2.2.3, 2.2.4, and 2.2.5, and Figure 4 of Appendix 3.1.1-2 of the Draft EIR. Please refer to **Response to Comment O-6.4-14**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-18** The comment summarizes an evaluation of elevation and slope ranges associated with the terrain surrounding the Project Area. The elevation range provided in the comment (500 to 1,900 feet) is similar to that presented in Appendix 3.1.1-2 for the Project Area (600 to 1,300 feet). The comment also notes that slope steepness in the area surrounding the Project Area reaches a maximum of 40 degrees (84%), and references a degree-to-slope conversion table (see **Response to Comment O-6.4-22**).

The comment also quotes Draft EIR Appendix 3.1.1-2 regarding slope ranges and average calculated slopes located within 300 feet of the Development Footprint, and states that slopes outside the Development Footprint are more relevant since they

represent an area to where a wildfire originating in the Project Area would spread. Please refer to **Response to Comment O-6.1-14** related to the intent of the Fire Protection Plan and the analysis of wildfire risk on adjacent areas presented in the Draft EIR.

The mapping of slopes outside the Development Footprint provided by the commenter (presented as Figures 5b and 6) present areas where slope gradients exceed 40%. The detail provided in the comment is insufficient to confirm the provided mapping, but, as acknowledged in Appendix 3.1.1-2 (page 22), “areas outside this Development Footprint include steeper terrain.” These areas typically slope up and away from the Project Area, which does not support the notion that a wildfire would burn faster toward the Proposed Project. If the Proposed Project were located at the top of these slopes, then that would represent a situation where slope-influenced fire behavior would require additional fire protection measures.

- O-6.4-19** The comment restates information from the Draft EIR, Appendix 3.1.1-2 (page 21) that fire spreads faster up-slope. The steepest slopes near the Proposed Project slope up and away from the Project Area, and occur 300 feet or more away from the Proposed Project. Firefighters would not be positioned on these slopes; they would be positioned within the Proposed Project where temporary refuge would be provided by ignition-resistant landscape associated with the Proposed Project and its fuel modification zones. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-20** The comment provides information regarding firefighting efforts affected by steep slopes. Please refer to **Responses to Comments O-6.4-18 and O-6.4-21**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-21** The comment expresses an opinion that the analysis of slopes immediately adjacent to the Development Footprint presented in the Draft EIR, Appendix 3.1.1-2, understates the effect of terrain on fire spread and control. The County disagrees. The intent of the analysis of slopes in Appendix 3.1.1-2 is to understand their influence on modeled fire behavior; therefore, the analysis of slopes in the fire behavior modeling scenarios presented in Appendix 3.1.1-2 is accurate and appropriate. Please refer to **Response to Comment O-6.4-14** related to the intent of the Fire Protection Plan and the analysis of wildfire risk on adjacent areas presented in the Draft EIR.

- O-6.4-22** The comment expresses an opinion that the percent to slope gradient conversion table provided in the comment appears to be accurate. Please refer to **Responses to Comments O-6.4-18 and O-6.4-21**.
- O-6.4-23** The comment (as Figure 5a) provides background information about slope steepness that is consistent with information contained in the Draft EIR, specifically Section 2.2.1, Topography, of Appendix 3.1.1-2. Please refer to **Responses to Comments O-6.4-14, O-6.4-18, and O-6.4-21**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-24** The comment (as Figure 5b) provides background information regarding slope steepness that is consistent with information contained in Section 2.2.1, Topography, of Appendix 3.1.1-2 of the Draft EIR. The County refers the commenter to **Responses to Comments O-6.4-14, O-6.4-18, and O-6.4-21**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-25** The comment (Figure 6 showing slopes greater than 40%) provides background information that is consistent with information regarding slope steepness contained in the Draft EIR, specifically Section 2.2.1 of Appendix 3.1.1-2. Please refer to **Responses to Comments O-6.4-18 and O-6.4-21**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-26** The comment restates information contained in Appendix 3.1.1-2 of the Draft EIR, specifically Section 4, Anticipated Fire Behavior, and Appendix E, Fire Behavior Modeling Input Data, which provide the analysis of fire modeling and impacts to the Proposed Project. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-27** The comment expresses an opinion that current conditions do not represent climax fuel conditions. The County acknowledges that the comment summarizes previous comments regarding fire history and fuel conditions in the Project Area. Please refer to **Responses to Comments O-6.4-3 and O-6.4-13 through O-6.4-14**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-28** The comment notes that current conditions do not represent climax fuel conditions and identifies fuel model assignments derived from a cross-walking procedure using Wildlife Habitat Relationships data that represent a climax condition. The Fire

Protection Plan's modeling of fire behavior used the same climax state fuel model assignments as the commenter for grass, sage scrub, and chaparral vegetation communities. The County acknowledges the comment as an introduction to comments that follow, and refers the commenter to **Response to Comment O-6.4-30**.

O-6.4-29 The comment expresses an opinion on the fire behavior modeling calculations in the Draft EIR, Appendix 3.1.1-2, and the comment identifies modeling input variables used. No documentation of the source of the commenter's modeling input variables is provided, so their accuracy cannot be verified. The County acknowledges the comment as an introduction to comments that follow and refers the commenter to **Response to Comment O-6.4-30**.

O-6.4-30 The comment restates that a range of wind speeds and slopes were used to model fire behavior in areas adjacent to the Development Footprint, and states that one fire safety impact is associated with a fire igniting within the Project Area and spreading to adjacent areas. See **Response to Comment O-6.4-32** regarding the linkage between wildfire ignitions and the development of ignition-resistant communities. See also **Responses to Comments O-6.14-14, O-6.4-18, and O-6.4-21** related to the intent of the Fire Protection Plan and the analysis of wildfire risk on adjacent areas presented in the Draft EIR.

The commenter used their own analysis of fire behavior to conclude that Appendix 3.1.1-2 underestimated potential fire behavior. The commenter's fire behavior analysis relies on generalized slope values (flat, 20 degrees, 40 degrees) and coarse-scale vegetation mapping to reach its conclusions. The generalized fire behavior calculations generated by the commenter were then compared with Appendix 3.1.1-2, which used more accurate, site-specific data. For example, the Wildlife Habitat Relationships grid vegetation mapping data used by the commenter for fuel model assignments is based on remote image processing techniques and has a ground resolution of 30 meters (98.4 feet). Additionally, no data source is provided for the commenter's slope analysis, so its accuracy cannot be verified. Conversely, the fire behavior analysis presented in Appendix 3.1.1-2 relies on more precise slope and vegetation mapping data. Slope values in the fire behavior modeling in Appendix 3.1.1-2 were derived from direct measurements of site-specific topographic base maps prepared for the Project Area. Fuel model assignments used in Appendix 3.1.1-2 are based on site-specific vegetation mapping data coupled with field-based observations. When compared with the analysis conducted in support of the Fire Protection Plan, the generalized fire behavior calculations presented by the commenter do not justify the assertion that Appendix 3.1.1-2 underestimated potential fire behavior for the Project Area.

The commenter also presented their maximum flame length values (49 feet) calculated in sage scrub vegetation (fuel model SCAL 18) and compared them to those generated in Appendix 3.1.1-2. Even with the increased flame lengths provided by the commenter (49 feet), the Proposed Project provides fuel modification zones that are twice as wide as the modeled flame lengths. Providing fuel modification zones twice the width of modeled flame lengths has been a standard benchmark in Southern California fire protection planning, and provides a baseline from which expansion or contraction can be analyzed. Even with the commenter's generalized fire behavior model inputs and resulting outputs, the Proposed Project's fuel modification zones would have been designed as they are currently presented in Appendix 3.1.1-2.

- O-6.4-31** The comment provides background information that is consistent with information presented in the Draft EIR at page 33 of Appendix 3.1.1-2, which states, "The Proposed Project would introduce potential ignition sources, particularly more people in the area." The County acknowledges the comment as an introduction to comments that follow, and refers the commenter to **Response to Comment O-6.4-32**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-32** Although it is true that humans are the cause of fires in California, there is no data available that links increases in wildfires with the development of ignition-resistant communities. For clarification, the Draft EIR text on page 3.1.1-25 has been revised as follows and is reflected in ~~strikeout~~/underline in the Final EIR:

~~Even with the~~The introduction of up to 1,119 new homes would not increase the potential likelihood of ignition sources, particularly more people in the Project Area, the likelihood of arson, off-road vehicle-related fires, or shooting-related fires, it is anticipated that wildfire ignitions would not increase from current levels with the Project Area.

Based on its location in a VHFHSZ, the Proposed Project is required to provide for a level of planning, ignition-resistant construction, access, water, fuel modification, and construction materials and methods that have been developed specifically to allow safe development within these areas. The Proposed Project meets and exceeds these requirements and, therefore, is consistent with General Plan Policy S-3.6, Fire Protection Measures. The San Diego County Fire Authority has reviewed and provided input on the Proposed Project's Fire Protection Plan (Appendix 3.1.1-2 of the Draft EIR), and based on the fire protection designs and measures integrated into the Proposed Project, disagrees that the Proposed Project presents a fire risk to its

residents or to residents in Chula Vista. The Proposed Project would provide additional buffer for the existing community to the west/southwest. This type of dense development with an unbroken landscape (as opposed to low-density wildland/urban intermix projects) has been found to perform well against wildfires (IBHS 2008; Syphard et al. 2015).

As detailed in the Fire Protection Plan, the Proposed Project would include a robust fire protection system that employs land use planning, site design, and ignition-resistant materials and methods to minimize fire risk to result in a fire-hardened project. This same robust fire protection system that protects the Proposed Project's structures, persons, and property also provides protections from on-site fire spreading to off-site vegetation. Accidental fires within the landscape or structures in the Proposed Project would have limited ability to spread. The landscape throughout the Proposed Project and on its perimeter would be highly maintained and much of it irrigated, which would further reduce its ignition potential. Structures would be highly ignition resistant on the exterior, and the interiors would be protected with automatic sprinkler systems, which have a high success rate for confining fires or extinguishing them. Additionally, future residents would enhance the wildfire detection network within the Project Area by providing additional fire-aware persons in the area. The community would be a fire-adapted community with a strong resident outreach program that raises fire awareness among its residents. Finally, as discussed in Draft EIR Section 3.1.1.2.4, Wildfire Hazards, in addition to existing fire protection services for the area, the proposed fire station within the Project Area would reduce the response time to wildfire ignitions and increase the likelihood of successful initial attacks that limit the spread of wildfires.

O-6.4-33 The County agrees with the comment's evaluation of general fire behavior during Santa Ana wind conditions. However, the County disagrees that an increased fire risk is present with the Proposed Project. There are currently populated areas (Jamul, Spring Valley, Rancho San Diego, and Campo Road [SR-94]) to the north/northwest of the portion of Chula Vista the comment refers to. These areas present human-related ignition sources with a consistent fuel bed between them and Chula Vista. The Proposed Project would increase human presence in the area. However, the Proposed Project has been analyzed and designed to minimize the likelihood that an ignition on site would occur, and if it did, that it would escape the site. Please refer to **Response to Comment O-6.4-32** for a response about the likelihood of an on-site fire burning to off-site fuels. However, if a structure fire ignited during a Santa Ana wind event and embers were cast into the open space, a wildfire could ignite. This is true today from the existing homes in the communities north/northwest of the area and on

- existing roadways, such as SR-94. Roadways are consistently some of the highest ignition points for wildfires. The Proposed Project would provide an ignition-resistant landscape that essentially breaks up fuel continuity; provides operational advantages, including anchor points; and offers temporary refuge for firefighters and citizens. The communities at the Chula Vista interface have also been designed and constructed to withstand wildfires with managed and maintained fuel modification zones and ignition-resistant construction. Therefore, the comment is acknowledged, but it provides no substantiation for its claims and requires no additional response.
- O-6.4-34** The County acknowledges the comment and notes that Appendix 3.1.1-2 followed the County-established format and focused on documenting the Proposed Project's compliance with fire and building codes. Also, the Proposed Project would provide fire service within General Plan requirements. The Fire Protection Plan process in San Diego County does not specifically address the potential for increased risk to adjacent communities. Further, as provided in **Responses to Comments O-6.4-14, O-6.4-32, and O-6.4-33**, the County does not agree that there is an increased risk from the Proposed Project to adjacent developed areas that is greater than the existing condition.
- O-6.4-35** The comment restates that the Draft EIR and FPP conclude that the Proposed Project would mitigate any increase in ignition sources with irrigated areas and fuel modification zones and that the Proposed Project would improve fire safety in the Project Area and adjacent communities, due to these irrigated areas and fuel modification zones. Please refer to **Responses to Comments O-6.4-14, O-6.4-32, and O-6.4-33** for details on why the Proposed Project is not considered to increase the fire risk to downwind communities from the existing condition. The comment does not raise a specific issue with the adequacy of the analysis in the Draft EIR; therefore, no further responses is provided or required.
- O-6.4-36** The comment states that the commenter disagrees with the conclusion in the Draft EIR and FPP and provides an example of a fire igniting in Planning Areas 16/19 under Santa Ana wind conditions. The comment states such a fire would spread southwest toward population centers through steep terrain largely unimpeded by fuel modification zones and irrigated areas. The comment concludes the ignition probability associated with the Proposed Project has a more significant negative impact on adjacent communities risk compared to any potential positive fire risk impacts associated with the Proposed Project's fuel modifications or irrigation.

Please refer to **Responses to Comments O-6.4-14, O-6.4-32, and O-6.4-33** for details regarding the County's evaluation of the existing condition's fire risk

- compared to the Proposed Project. Further, a fire ignited in Planning Areas 16/19 with winds blowing to the southwest would direct such a fire into the Proposed Project (Village 14), which would have ignition-resistant structures, structures with interior sprinkler systems, ignition-resistant landscaping, and fuel modification zones. These factors would decrease the risk of such a fire spreading. The comment provides an opinion that is unsubstantiated and, therefore, requires no additional response.
- O-6.4-37** The comment (as Figure 7) provides background information on surrounding development, and refers the commenter to **Response to Comment O-6.4-33**. The comment does not raise any issue concerning the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-6.4-38** The County disagrees with the comment that evacuations along Proctor Valley Road during a fire event that is approaching from the north/northwest has not been evaluated in the Proposed Project's evacuation plan (Appendix 3.1.1-3, Wildland Fire Evacuation Plan). The Draft EIR, specifically Appendix 3.1.1-3 Section 4.2 (page 18) and Section 6.0 (page 26), discusses potential scenarios where evacuation to the north is not possible due to road conditions or fire approach, and a contingency option is available. Further, Draft EIR Appendix 3.1.1-3 Section 3.3.2, Section 4.0 (page 13), and Section 6.3 (page 30) discuss the contingency option of temporarily sheltering on site within protected homes, the school, or other designated areas when road conditions are considered unsafe, which includes the scenario described in the comment. As explained in Appendix 3.1.1-3 Section 6.3 (page 30), although it is not possible to anticipate every type of evacuation scenario, it is possible that problems arise during an evacuation and a contingency option needs to be provided. Problems included fires that prevent safe passage along planned evacuation routes, inadequate time to safely evacuate, blocked traffic, and others. The ability for the County Office of Emergency Services, Incident Command, and on-site law enforcement and fire personnel to direct residents to temporarily remain in their well-protected homes provides the contingency option if evacuation is considered unsafe. Because the comment erroneously states that the Wildland Fire Evacuation Plan did not contemplate and evaluate a potential scenario where evacuation to the north on Proctor Valley Road is not possible, the comment requires no additional response.
- O-6.4-39** The comment (as Figure 8) provides background information about Proctor Valley Road that is consistent with information contained in Chapter 1, Project Description, of the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.4-40 The County acknowledges the comment as a summary of the previous comments. Please refer to **Responses to Comments O-6.4-1 through O-6.4-39**. As described therein, the analysis does not require significant revisions that necessitate recirculation of the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

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