O-6.5 GRIFFIN COVE TRANSPORTATION CONSULTING PLLC

O-6.5-1 The County acknowledges the comment as 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-6.5-2 The comment restates information contained in the Draft EIR, particularly from Section 4.2, Roadway Capacities and Maximum Evacuation Time Estimate (pages 17 and 18), of Appendix 3.1.1-3, Wildland Fire Evacuation Plan. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.5-3 The County acknowledges the comment as 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-6.5-4 The comment restates information contained in the Draft EIR, particularly from Section 4 of Appendix 3.1.1-3, and does not raise an environmental issue within the meaning of CEQA. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.5-5 The County disagrees with the comment that the Draft EIR, Appendix 3.1.1-3, ignores potential impacts of a fire that starts in the vicinity of the Project Area. The comment provides a quote from Appendix 3.1.1-3 that states that not all fires will start at great distances from the Project Area.

Draft EIR Appendix 3.1.1-3, Section 3.3.2, Section 4 (page 13), and Section 6.3 (page 30) discuss the contingency option of temporary 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 could arise during an evacuation, and a contingency option needs to be provided. Problems include 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 homes provides the contingency option when and if evacuation is considered unsafe. Appendix 3.1.1-3, Section 6.1, FlamMap Fire Behavior and Progression Analysis, and Section 6.2, Village 14 and Planning Areas 16/19 Evacuation Baseline, did address and evaluate a potential scenario where

evacuation is not possible due to a short-notice event. Specifically, page 27 of Appendix 3.1.1-3, Wildland Fire Evacuation Plan, states,

> [I]f at any time fire is anticipated to threaten evacuation routes, incident managers should evaluate evacuation contingencies, including moving people to the Village Core, the on-site school, the public safety site, or temporarily refuging some or all remaining residents in their homes for the short duration that active wildfire would burn adjacent the site's FMZs [Fire Management Zones].

Please also refer to **Thematic Response – Wildfire Protection and Evacuation**. The comment requires no additional response.

O-6.5-6 The County disagrees with the comment that the scenario was not evaluated and that Appendix 3.1.1-3 requires revision. Please refer to **Response to Comment O-6.5-5** for the County's response to the comment that evaluation of a short-notice fire scenario with little mobilization time was not evaluated and that Appendix 3.1.1-3 must be revised.

O-6.5-7 The comment restates information contained in the Draft EIR, particularly from the Draft EIR, Section 2.9, Transportation and Traffic, and Appendix 3.1.1-3, Section 4 (page 13 and Table 1). The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.5-8 The comment quotes the Transportation Research Board's Highway Capacity Manual (HCM) (TRB 2010) two-lane highway capacity of 1,700 passenger cars per-hour per-lane (pc/h/l).

The County acknowledges the commenter's opinion that Proctor Valley Road should be evaluated using the two-lane highway capacity instead of those provided by traffic engineer Chen Ryan of 1,900 pc/h/l. A two-lane highway is defined in Chapter 15 of the HCM as follows (HCM page 15-1):

> Two-lane highways have one lane for the use of traffic in each direction. The principal characteristic that distinguishes two-lane highway operation from that of other uninterrupted-flow facilities is that passing maneuvers take place in the opposing lane of traffic. Passing maneuvers are limited by the availability of gaps in the opposing traffic stream and by the availability of sufficient sight distance for a driver to discern the approach of an opposing vehicle safely.

As re-stated by the commenter in **Comment O-6.5-7**, Proctor Valley Road is a two-lane roadway with 12-foot travel lanes, a 4- to 14-foot-wide raised median, 8-foot-wide bike lanes, and a 6-foot-wide shoulder on each side, which is consistent with a modified two-lane Light Collector (2.2A) road classification in the County of San Diego's General Plan Mobility Element to provide "improve[d] traffic flow." Turn pockets and intersection control in the form of a series of roundabouts are also proposed along the Proposed Project's frontage for traffic calming. Proctor Valley Road, as a General Plan Mobility Element two-lane Light Collector (2.2E), is an urban street facility, and the urban street capacity in Chapter 16 of the HCM should apply to Proctor Valley Road. Per Chapter 16 of the HCM (page 16.29), the urban street facility capacity is 1,900 pc/h/l. As such, the two-lane-highway capacity of 1,700 pc/h/l is not appropriate for Proctor Valley Road.

O-6.5-9 The County acknowledges the comment as an introduction to comments that follow. Please refer to **Responses to Comments O-6.5-10 through O-6.5-12.** The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.5-10 The County agrees with the comment that during a wildfire, smoke, and other fire-related factors may affect evacuations and roadway capacity. However, Appendix 3.1.1-3 of the Draft EIR discussed these potential impacts and stressed the importance of early evacuations and use of the safer contingency option of temporarily sheltering in place as opposed to a late evacuation when roadways may be considered unsafe. The Proposed Project has been designed to include this contingency option when it is considered safer than evacuating residents.

O-6.5-11 The County does not agree that the Draft EIR, Appendix 3.1.1-3 did not consider the potential evacuation impacts from slower recreational vehicles and trucks. Draft EIR Appendix 3.1.1-3, Wildland Fire Evacuation Plan, Section 4.2 includes a buffer of 45 minutes to the calculated evacuation times, which is intended to account for delays and impedances, including slow-moving vehicles. Proctor Valley Road includes a series of five roundabouts designed to accommodate longer wheel-based vehicles, including trucks and recreational vehicles, rather than stop-controlled intersections, which would facilitate the flow of traffic in an emergency evacuation scenario. Further, as detailed in **Responses to Comments O-6.5-5 through O-6.5-8** and **O-6.5-10**, Appendix 3.1.1-3 discusses a contingency to unsafe evacuations, which includes slow-moving traffic, congested roads, and accidents causing impedances, among others.

O-6.5-12 The County does not agree that Appendix 3.1.1-3 did not consider the potential effects of drivers and their varying emotional states on evacuation events. Please refer to **Responses to Comments O-6.5-10 and O-6.5-11** for a discussion of how Appendix 3.1.1-3 addresses potential evacuation impedances. Further, the research cited in Section 6.4 (and referenced in Section 8) of Appendix 3.1.1-3 indicates that movement of people during an emergency situation is typically manageable, particularly when directions are provided by persons of authority. As stated on page 34, "Citizen reactions may vary during an evacuation event, although several studies indicate that orderly movement during wildfire and other emergencies is not typically unmanageable" (see Section 6.4 of Appendix 3.1.1-3).

O-6.5-13 The County acknowledges the comment as a summary of the previous comments. Please refer to **Responses to Comments O-6.5-7 through O-6.5-12**, above. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.5-14 The County disagrees with the comment that traffic demand estimates are flawed and evacuations along Proctor Valley Road during a fire event that is approaching from the north, northeast, and east has not been evaluated with the possibility that other communities may be using Proctor Valley Road simultaneously. The comment indicates that a key element of the Wildland Fire Evacuation Plan (Appendix 3.1.1-3) is the ability of Proctor Valley Road to accommodate the volume of traffic that would occur during an evacuation. For the Proposed Project, the capacity of Proctor Valley Road provides a reasonable estimate of the amount of time that may be necessary to move residents off site, even given that there may be other traffic and impedances. However, as explained in the Wildland Fire Evacuation Plan (Appendix 3.1.1-3), evacuation on Proctor Valley Road is not the only option.

Regardless of the length of time needed to evacuate, at any point during an evacuation, it can be ceased, and residents, and potentially non-resident traffic, can be directed to shelter on site if it is considered safer than a late evacuation where evacuees could be exposed to fire while driving. The fire from the north/northeast example in the comment would either be a short-notice event—in which case, it would be preferable to shelter on site at the Proposed Project—or it would be a longer-notice event and there would be time to continue directing traffic out of the area, including traffic from Jamul.

Although everyday traffic flow is subject to programmed controls at intersections and follows pre-determined signalized patterns, evacuation traffic is typically allowed to flow more consistently, with intersections controlled by law enforcement personnel,

enabling more cars to proceed through intersections. Proctor Valley Road from the Proposed Project to Chula Vista includes no intersections until within developed portions of Chula Vista and Jamul, aiding law enforcement's ability to control those intersections.

Further, if a wildfire occurred during a peak-hour period, law enforcement would likely suspend traffic entering the area from the north and the south (unless it was safe to move traffic), minimizing the additional flows of vehicles into the area and opening the road to residents.

In addition, the Jamul community (which is a semi-rural area located to the northeast of the Project Area) has a variety of other evacuation routes depending on the location of the approaching fire. Those other routes include SR-94 to the west and SR-94 south to Otay Lakes Road and west into the City of Chula Vista. Both SR-94 and Otay Lakes Road in the area near the Proposed Project are fully improved two-lane roads with paved shoulders.

Lastly, if the roads are considered impeded and potentially unsafe, law enforcement and fire personnel may direct residents of the Proposed Project to remain in their homes or shelter at the school or in another designated area on site, and remain alert until it is safe to evacuate.

Please also refer to **Thematic Response – Wildfire Protection and Evacuation**.

O-6.5-15 The comment restates information contained in the Draft EIR, particularly Appendix 2.9-1, Transportation Impact Study (TIS). The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.5-16 The County acknowledges the comment and refers the commenter to Appendix 2.9-1, Transportation Impact Study (TIS). As shown in Table 7.1 of the TIS, under the Year 2030 Cumulative Conditions, which includes all ambient and pass-through traffic, all intersections along Proctor Valley Road are shown to operate at acceptable level of service (LOS) D or better, with the exception of the intersection of Aqua Vista Drive/Northwoods Drive and Proctor Valley Road. The Proposed Project's impact to this intersection would be mitigated through mitigation measure M-TR-3, which would include signalizing this intersection. It should also be noted that signal mast arms have already been constructed at this intersection, and only a minor improvement would be required to implement a signal at this intersection. Table 7.7 of the TIS shows the intersection LOS after mitigation. As shown in Table 7.7, with

signalization, the intersection of Aqua Vista Drive/Northwood Drive and Proctor Valley Road would operate at LOS B during both the AM and PM peak hours.

Please refer to **Response to Comment O-6.5-14**, which notes that if a wildfire occurred during a peak-hour period, law enforcement may suspend traffic entering the area from the north and south (unless it is safe to move traffic), minimizing the potentially unsafe additional flow of vehicles into the area and opening the road to residents. Or, if roads are considered impeded, fire personnel may direct residents of the Proposed Project to remain in their homes, shelter at the school, or shelter in another designated area on site and remain alert until it is safe to evacuate. Please also refer to **Thematic Response – Wildfire Protection and Evacuation**.

O-6.5-17 The comment expresses the opinion of the commenter regarding the effect of non-Project traffic. Please refer to **Response to Comment O-6.5-14**.

O-6.5-18 The comment restates information contained in the Draft EIR, particularly from Section 4.2 of Appendix 3.1.1-3. With respect to the methodology used, the traffic calculations used are not specifically called out in Appendix 3.1.1-3, but are easily derived in Appendix 3.1.1-3, Section 4.2, pages 17 and 18. The calculation is a simple division of the number of vehicles evacuating by the number of vehicles per hour the evacuation roads can accommodate.

Please refer to **Response to Comments O-6.5-19 through O-6.5-24**. No further response is required or provided.

O-6.5-19 The County acknowledges the comment and notes that the commenter assumes a two-lane highway capacity for Proctor Valley Road. Please see **Response to Comment O-6.5-7** for discussion regarding the proper roadway capacity for Proctor Valley Road. The Draft EIR and Appendix 2.9-1 correctly classified Proctor Valley Road as an urban street facility with a capacity of 1,900 pc/h/ln. Thus, the evacuation was calculated using the correct capacity.

The County disagrees that the evacuation time estimates are too low. The Draft EIR, Appendix 3.1.1-3, Wildland Fire Evacuation Plan, provides time estimates which are based on roadway capacities, use a conservative number of vehicles, provide a substantial buffer for delays, and are based on an early evacuation scenario. The Proposed Project focuses on an early evacuation scenario because in a late evacuation scenario, the Proposed Project would not necessarily be evacuating if it were considered unsafe, since the Proposed Project offers the potential of temporarily

sheltering on site. Please refer to **Responses to Comments O-6.5-8** and **O-6.5-10 through O-6.5-12,** and **Thematic Response – Wildfire Protection and Evacuation.**

O-6.5-20 The comment expresses an opinion on a peak-hour factors. The County disagrees that this peak-hour traffic factor is applicable to an evacuation scenario. It is speculative to try to predict how long residents will take to gather their belongings and leave the area once notified to evacuate. Estimates are provided based on the Wildland Fire Evacuation Plan preparer's research, which indicated that evacuation times would vary, including for those who may already be off site at work or school, those who are ready to go at a moment's notice, and those who would require more than 45 minutes to begin driving. For the purposes of the Draft EIR, Appendix 3.1.1-3, an estimate of the metered flow is considered sufficient, particularly since it is buffered with a safety time factor to account for impedances. In most cases, there will be law enforcement and/or fire personnel directing traffic out of the area and providing the metering, which is the basis for the estimates provided. The metering by traffic controllers would at least partially negate the "pulse" described in the comment.

O-6.5-21 The comment provides the commenter's results for evacuation times based on his roadway capacity analysis using peak-hour factor values from 0.5 to 1.0. The comment states that evacuation times could be almost 3 hours under Scenario 2, and up to 2 hours under Scenario 1. These times are consistent with the results of Appendix 3.1.1-3, which provides that "under Scenario 1, it is conservatively estimated that the community can be completely evacuated within approximately 2.5 to 3 hours once notification has been provided," and "under Scenario 2, it is conservatively estimated that the community can be completely evacuated to the south (and west) within 2.5 hours once notification has been provided (up to 45 minutes after evacuation notifications completed), or just over 3 hours with mobilization." Please refer to **Response to Comment O-6.5-20** regarding the County's evaluation of the applicability of the peak-hour factor model. Regardless of the results of this evaluation, if an evacuation scenario occurs where there is not enough time to safely evacuate the Proposed Project, the contingency option of temporarily sheltering on site would be available to decision makers as a safer alternative to late evacuation, as discussed in **Response to Comment O-6.5-14**.

O-6.5-22 The comment expresses an opinion that the analysis ignores possible issues related to abnormal driver behavior due to the emotional factors and would certainly affect the efficiency of the evaluation process. The County disagrees with this comment. The Draft EIR, Wildland Fire Evacuation Plan (Appendix 3.1.1-3), Section 6.4 did address evacuation scenarios of various potential delays and impedances, including driver behavior. Please refer to **Responses to Comments O-6.5-10 through O-6.5-12.**

O-6.5-23 The County appreciates the comment regarding LOS, but considers everyday road capacity ratings and procedures to be invalid for emergency evacuation road evaluations. Urban areas that include mass evacuations experience traffic congestion. The Draft EIR, Appendix 3.1.1-3, calls for early evacuations that allow adequate time to move potentially affected people out of harm's way. Through the County's restrictive fire hazard severity zone building codes, which require ignition-resistant structures, fuel modification zones as buffers for structures, and lower flammability landscaping, Appendix 3.1.1-3 provides another level of safety by enabling emergency management personnel the contingency option of temporarily sheltering residents in their protected homes, at the school, or in other designated areas if it is considered unsafe to evacuate, including if evacuation routes are congested and would put residents in harm's way. Please refer to **Response to Comment O-6.5-16.**

O-6.5-24 The County does not agree that the Draft EIR, Appendix 3.1.1-3 underestimated evacuation times. Please refer to **Responses to Comments O-6.5-1 through O-6.5-23**, above, and **Thematic Response – Wildfire Protection and Evacuation**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.5-25 The County acknowledges the comment as a summary of the previous comments. Please refer to **Responses to Comments O-6.5-1 through O-6.5-24**, above. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-6.5-26 The County acknowledges the comment and notes that it provides concluding remarks that do not raise new or additional environmental issues regarding the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.