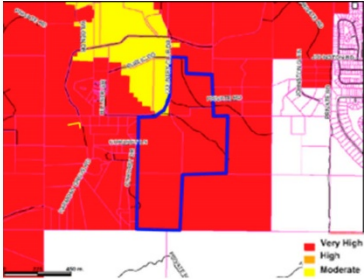









COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter I39b</p> <p>June 20, 2017</p> <p>Michelle Irace</p> <p>Planning & Development Services</p> <p>County of San Diego</p> <p>5510 Overland Avenue, Suite 310</p> <p>San Diego, CA. 92123</p> <p>Re: Harmony Grove Village South (HGVS) Draft Environmental Impact Report</p> <p>PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006</p> <p>Dear County of San Diego,</p> <p><u>Fire Protection Plan:</u></p> <p>In the Executive Summary of this document the concluding paragraph reads:</p> <p style="margin-left: 40px;">The HGVS property lies within an area statutorily designated State Responsibility Area (SRA) “Very High Fire Hazard Severity Zone (VHFHSZ),” by CAL FIRE and recognized by the County of San Diego and RSFFPD. The site’s vegetation is primarily non-native, disturbed grasses in the development area with Southern mixed chaparral on the steep slopes at the southern end of the property. Off-site, adjacent areas include chaparral to the south and disturbed/developed areas to the east, west and north. The area, like all of San Diego County, is subject to seasonal weather conditions that can heighten the likelihood of fire ignition and spread; however, considering the site’s location, would be expected to result in spotty, potentially fast moving and primarily low- to moderate-intensity wildfire.</p> <p style="margin-left: 40px;">The conclusion that the site conditions, “would be expected to result in spotty, potentially fast moving and primarily low- to moderate-intensity wildfire.”</p> <p style="text-align: center;">1</p>	<p>Response to Comment I39b-1</p> <p>The quotation from the Project’s Fire Protection Plan’s (FPP’s) Executive Summary is noted, as is the conclusion from the FPP that site conditions would result in a spotty, potentially fast-moving, and primarily low- to moderate-intensity wildfire. The comment indicates that the fire behavior discussion in the FPP is at odds with the location of the Project within a very high fire hazard severity area (VHFHSZ). Fire hazard severity areas are based on potential for wildfire to occur given fuels, terrain, weather, and other factors. The FPP provides a thorough fire behavior analysis, reviewed and accepted by the Rancho Santa Fe Fire Protection District (RSFFPD) and the County of San Diego, and confirmed by the fire behavior modeling efforts of a third-party consultant (Rohde & Associates 2016). The conclusions relate to how wildfires burn across a landscape that includes heavy brush in some areas; disturbed, paved, and developed areas in others; and flashy fuels interspersed. Wildfire in these conditions is spotty, may have multiple fire fronts and spot fires, and burns more aggressively in heavier fuels and on steep slopes than on flat land with lighter, flashy fuels. The conclusions in the FPP are not conflicting with its location within a VHFHSZ. Conversely, the fire behavior conclusions in the FPP describe how wildfire burns in this particular type of VHFHSZ. Based on the Project’s location in a VHFHSZ, it is required 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 Project meets and exceeds these requirements.</p> <p>The comment includes a quote from page 15 of the FPP regarding typical wildfire characteristics. It also includes a quote from page 27 of the FPP regarding worst-case wildfire conditions as modeled and as experienced during historic, vicinity wildfires. The summary of the 2014 (Cocos) wildfire behavior is acknowledged and is not in variance from the FPP’s/DEIR’s analysis.</p> <p>The photographs of the Cocos Fire are noted and will be included in the FEIR. The account of the Cocos fire burning several structures is acknowledged as is the fact that other wildfires (unprecedented 14 fires) were occurring simultaneously in San Diego County. However, there was not an</p>



COMMENTS	RESPONSES
	<p>acknowledged lack of fire-fighting resources as 1,300 personnel, 164 fire engines, 27 hand crews, 11 dozers, and 15 aircraft were assigned to the Cocos Fire, still allowing similar, proportional resources for the other fire events (County of San Diego OES May 2014 San Diego County Wildfires After Action Report, June 2016; incorporated by reference). These comments are not in variance with the FPP's/DEIR's analysis or conclusions.</p> <p>The Coco's fire ran out of fuels near the Escondido Industrial Park west of Citracado Parkway. Development of new, ignition-resistant buildings and maintained, fire-resistive landscapes starved the fire of fuels and it was controlled. On the other fire front that approached the Harmony Grove Viliage South (HGV South) Project site, firefighters were able to hold the fire at Country Club Drive near Harmony Grove Road due to a weather shift and lack of continuous fuels (Battalion Chief Christopher, Laguna Beach Fire Department, personal communication October 2016; incorporated by reference)</p> <p>Unfortunately, most homes lost in wildfires, including the Cocos Fire, can be attributed to: (1) older construction that does not include ignition-resistant materials and methods that are required of new structures in the wildland urban interface and VHFHSZs, and (2) lack of maintained fuel modification zones (CAL FIRE 2007 – Wildland-Urban Interface Building Codes).</p> <p>Photographs provided in the comment regarding the Cocos Fire entering south Harmony Grove are noted. The comment mentions a spot fire contributing to the fire spread rates, which is consistent with the Project's FPP fire behavior analysis.</p>

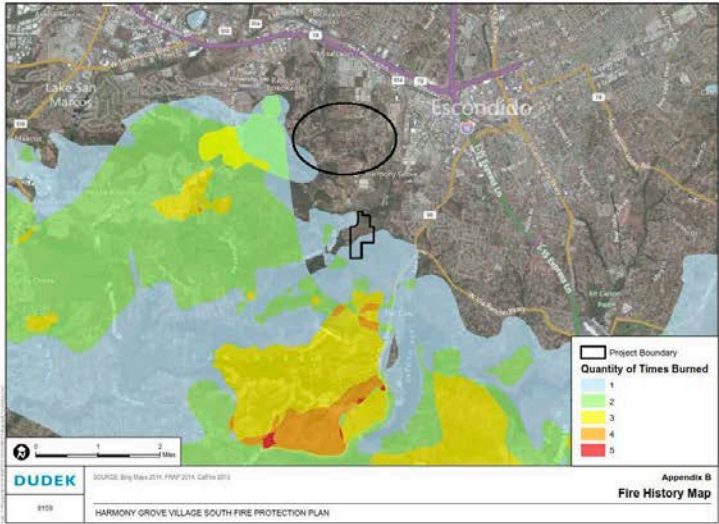
COMMENTS	RESPONSES
<p data-bbox="753 233 938 253">Comment Letter I39b</p> <div data-bbox="218 310 579 586">  <p data-bbox="583 570 735 586">Project outline in blue</p> <p data-bbox="218 605 735 621">Fire Hazard Severity Zones-Property Specific Request SD-7 GP Update 2010</p> </div> <p data-bbox="218 673 930 781">While the historic fire activities may be considered “spotty, potentially fast moving and primarily low-to moderate-intensity wildfire”, over the past several decades, they have been sufficiently intense to destroy thousands of acres of habitat, hundreds of homes, and have caused at least one fatality in nearby Elfin Forest. It seems to be an odd conclusion to reach regarding fire intensity when the lead sentence in the paragraph recognizes the area to be rated as a “Very High Fire Hazard Severity Zone”.</p> <p data-bbox="218 902 474 919">Page 15 of the document states that;</p> <p data-bbox="218 935 915 1045">Based on fire history, wildfire risk for the project site is associated primarily with wind-driven fires originating near Lake Hodges (such as along Del Dios Highway) and burning or spotting onto the site from the south. Although a fire approaching from the west during more typical on-shore weather patterns is possible, it would typically occur with higher humidity and fuel moisture levels and lower average wind speed, resulting in a more manageable fire.</p> <p data-bbox="218 1084 386 1101">Additionally on page 27;</p> <p data-bbox="573 1321 585 1338">2</p>	<p data-bbox="953 662 1008 678">I39b-1</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter I39b</p> <p>Based on the results of fire behavior modeling, a typical fire in the Project vicinity will be a sage scrub-chaparral fueled fire that moves quickly, burning with moderate to high intensity. The fire is anticipated to be a wind-driven fire from the east or north during the fall. Flame lengths in the fuels could reach 84 feet with spread rates reaching approximately 17 mph during an extreme weather event at the worst-case condition area modeled. Note that this result does not indicate that a wildfire in the area would produce an average of 84 feet flame lengths. Rather, the worst case weather conditions could produce flame lengths of 84 feet at the worst-case modeling location. A typical cause may be related to structure fires in the neighborhoods to the north and east or roadways (tossed cigarette, car fire, or electrical powerline arching).</p> <p>The most recent fire in 2014 (Cocos) originated to the northwest in the Coronado Hills, and swirled around in several directions over two days, advancing into southern Harmony Grove from the northwest, destroying over 20 homes within ¼ mile of the HGVS project site.</p> <p>The following photos were taken by me beginning 5/14/14 when the Cocos Fire was started at a residence on the western slope of the Coronado Hills by an act of arson by a teenager angry at her parents. The sequence of photos documents the progress of the fire as nightfall approaches. While this fire could be classified as moderate intensity, as mentioned in the executive summary, it destroyed several homes in the Coronado Hills throughout 5/14/15.</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <div style="text-align: right; margin-top: 20px;">I39b-1</div>	

COMMENTS	RESPONSES
<p data-bbox="753 233 940 253">Comment Letter I39b</p> <div data-bbox="218 313 501 522">  </div> <div data-bbox="569 310 852 522">  </div> <div data-bbox="218 573 506 789">  </div> <div data-bbox="560 570 852 789">  </div> <p data-bbox="959 646 1014 662">I39b-1</p> <p data-bbox="218 907 940 1015">The below photograph was taken by me at about 8:10 AM on the morning of 5/15/14, the second day of the Cocos Fire. The conditions appeared to be fairly benign and it appeared the fire agencies had the advantage. The night before this photo was taken the fire had destroyed several homes in the Coronado Hills. Several other wildland fires were burning simultaneously throughout San Diego County and fire and law enforcement resources were spread extremely thin.</p> <p data-bbox="573 1321 583 1338">4</p>	

COMMENTS	RESPONSES
<p data-bbox="753 233 940 253">Comment Letter I39b</p>  <p data-bbox="218 685 495 704">0810 5/15/14 Cocos Fire-Coronado Hills</p> <p data-bbox="218 755 940 841">Within a few hours the fire had exploded and was advancing on two fronts, the one moving southeast in to southern Harmony Grove, and north and east, in to Eden Valley. Both fire fronts destroyed homes. The eastern front finally stopped at the western border of the Escondido Industrial Park just south of Palomar Hospital west of Citracado Parkway.</p> <p data-bbox="218 855 940 941">The Harmony Grove front crossed Harmony Grove Road coming downhill off of southern end of the Coronado Hills, and destroyed over 20 homes near the southwestern end of Country Club Drive. This fire front stopped when it reached the border of the proposed HGVS site when it hit Country Club Drive and did not jump the street in to the HGVS site.</p> <p data-bbox="218 956 940 1042">The two following photos are of the Cocos Fire as it entered south Harmony Grove. Note the spot fire in the grasslands on the hillside across from the HGVS site (photo on left). This was an ember fire about 900' in front of the main fire line, which was a primary contributor to the speed at which this fire was advancing.</p> <p data-bbox="573 1321 583 1341">5</p>	<p data-bbox="961 670 1018 690">I39b-1</p>

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter I39b</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p style="text-align: center;">5/15/14 Cocos Fire HGVS site in foreground 5/15/14 Cocos Fire HGVS site in foreground</p> <p>As a result of this multi-front fire, both Harmony Grove Road and Country Club Drive were cut-off as escape routes at various times during this incident. This left Harmony Grove Road travelling east to Escondido as the remaining escape route, probably the most hazardous route given its narrow two-lane, winding construction, through the steep canyon to the east of the intersection of Harmony Grove Road and Country Club Drive. This canyon, about a mile in length, has steep, dense chaparral covered slopes on both sides of the road. If this stretch of Harmony Grove Road were grid-locked during a fire of the Cocos Fire's intensity and the fire spread into this canyon, the likelihood of loss of life would be very high.</p> <p>In the Analysis of Project Effects there is a "Fire History Map" (Appendix B) which appears to omit portions of the area which was burned in 2014 by the Cocos Fire. Specifically, north of Harmony Grove Village, in the community of Eden Valley, the Cocos Fire burned much further north and east. The fire burned east along Mt. Whitney Road and crossed Country Club Drive (the route identified in this document as the safest route of escape in most instances). The fire was of sufficient intensity that it burned several houses along Mt. Whitney Road, crossed Country Club Drive, continued east primarily in the SDG&E power line easement, crossed Koana Loa Drive, and stopped at the western edge of the industrial park in Escondido.</p> <p>See map on following page. Area circled in black is the approximate area in which the Cocos Fire burned but is not depicted on this map in the FPP.</p> <p style="text-align: center;">6</p>	<p>Response to Comment I39b-2</p> <p>The comments regarding potential evacuation routes being unavailable at times during the Cocos fire are noted. Please see the Global Responses to Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I39b-3</p> <p>The comment regarding the Cocos Fire perimeter as represented on the FPP Fire History Map (Appendix B) is noted. The Fire History Map was prepared with fire perimeter data available from CAL FIRE's Fire Resource and Assessment Program (2016) at: http://frap.fire.ca.gov/data/frapgisdata-subset and is incorporated herein by this reference). It is unclear why the CAL FIRE data differs from the commenter's, which aligns with the San Diego County GIS Cocos Fire perimeter (June 2016). The fire effects may have crossed Country Club drive and homes lost were likely from embers that flew ahead of the fire and entered attics or burned unmaintained vegetation or combustible near homes. The difference in fire perimeters is noted and has been updated to reflect the County's official fire perimeter in the FPP's appendix. The change in fire perimeter does not impact the FPP's/EIR's and Wildfire Risk Analysis Report (Rohde & Associates 2016) analysis that Country Club Drive is the primary evacuation route.</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter I39b</p>  <p>I39b-3</p> <p>On page 19 of the FPP, under "Determination of Project Effects", the question is posed;</p> <p><i>Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</i></p> <p>I39b-4</p> <p>The next paragraph states, "...it has been determined that wildfires may occur in the wildland areas to the west, east, south, and southwest of the project site, but would not be significantly increased in frequency, duration, or size with the construction of the project."</p> <p>The mere presence of more than a thousand human residents introduces that many more ignition sources since over 80% of wildland fires are human-caused (http://www.npr.org/sections/thetwo-way/2017/02/27/517100594/whats-the-leading-cause-of-wildfires-in-the-u-s-humans). The FPP justifies this conclusion by stating, "The project would introduce potential ignition sources, but would also include conversion of ignitable fuels to lower flammability landscape and include better access</p> <p style="text-align: center;">7</p>	<p>Response to Comment I39b-4</p> <p>The Project will include a robust fire protection system, as detailed in the comment and further in the Project's FPP. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>This same robust fire protection system provides protections from on-site fire spreading to off-site vegetation. Accidental fires within the landscape or structures in the Project will have limited ability to spread. The landscape throughout the Project and on its perimeter will be highly maintained and much of it irrigated, which further reduces its ignition potential. Structures will be highly ignition-resistant on the exterior, and the interiors will be protected with automatic sprinkler systems, which have a very high success rate for confining fires or extinguishing them. The HGV South community will be a fire-adapted community with a strong resident outreach program that raises fire awareness among its residents.</p> <p>The conversion of fuels in this area provides a benefit to some legacy residents as it creates a buffer that will act as a fuel break, slowing fire spread and changing fire behavior. The HGV South Project's location is advantageous because it is not built on slopes or at the top of ridges, where fires typically burn more aggressively up the shrub covered slopes. Because the FPP/EIR analysis concludes that the potential increase in ignition sources with the Project is offset by the fire protection features and outreach and there are no statistics or real-life examples that these types of developments cause additional fires, as indicated by the acceptance of the Project's FPP by the fire authorities in charge, there is no nexus for providing mitigation to nearby existing residences.</p>

COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter I39b</p> <p>throughout the site...(Page 19)". While some onsite fuels might be converted to lower flammability, the project would still be surrounded, in most cases within 100', with highly flammable chaparral and sage scrub landscapes. What could possibly go wrong?</p> <p>The same paragraph goes on to state, "Fires from off site would not have continuous fuels across this site and would therefore be expected to burn around and/or over the site via spotting." This, like much of the language in the FPP, disregards existing residences that are sited on the periphery of the project, and were not, in most cases, built to modern fire code standards, and therefore would suffer the effect of increased human ignition sources introduced by this project, yet the DEIR offers no mitigation to the existing residences in the community other than the erroneous claim that some minor road improvement will allow residents to evacuate and a 5,000 square foot evacuation/shelter in place center with a capacity for far fewer than the total number of residents in the valley if HGVS were built (and no consideration for domestic animals and livestock).</p> <p>The next paragraph states;</p> <p>The Project would comply with applicable fire and building codes and would include a layered fire protection system designed to current codes and inclusive of site-specific measures that will result in a Project that is less susceptible to wildfire than surrounding landscapes and that would facilitate firefighter and medical aid response as well as project resident evacuation in a wildfire emergency. Given the anticipated maximum fuel loading for the natural areas off site, resulting fire behavior modeling results, which closely mimic reported Fire behavior from the most recent fire in the area, the 2014 Cocos Fire, combined with the required ignition resistance construction the risk of wildfire damage to the project site's structures and its residents is considered low.</p> <p>If the project is introducing significantly more ignition sources to the community, shouldn't it also mitigate the effects of increased fire frequency for those existing adjacent residences? Shouldn't the "layered fire protection system" be extended to these existing residences as well? Should the existing residences in Harmony Grove be brought up to current fire resistance construction standards as mitigation for the increased ignition sources?</p> <p>Fire Access/Evacuation/Secondary Access:</p> <p>The roadway improvements for a project that increases density and units by approximately 800% in this constrained valley, in a "very high fire hazard zone", includes widening Country Club Drive to three lanes from its current two lane width within the area of the project and just north to Harmony Grove Road, and the construction of a three lane bridge where Country Club Drive currently crosses Escondido Creek to replace the current two lane Arizona type crossing.</p> <p>On page 34 the report claims that these road improvements will lower the total evacuation time for the project (no mention if existing residences are included) to approximately 30 minutes. It's not clear if the term "evacuation" means all vehicle will have reached the intersection of Harmony Grove Road and</p> <p style="text-align: center;">8</p> <div style="position: absolute; right: 0; top: 40%; transform: translateY(-50%);"> <p>I39b-4</p> <p>I39b-5</p> </div>	<p>Response to Comment I39b-5</p> <p>Introductory comments regarding the Country Club Drive improvements, including the provisions for a proportionately wide bridge over Escondido Creek, are noted and are not in variance with the Project's FPP/EIR analysis.</p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p>

COMMENTS

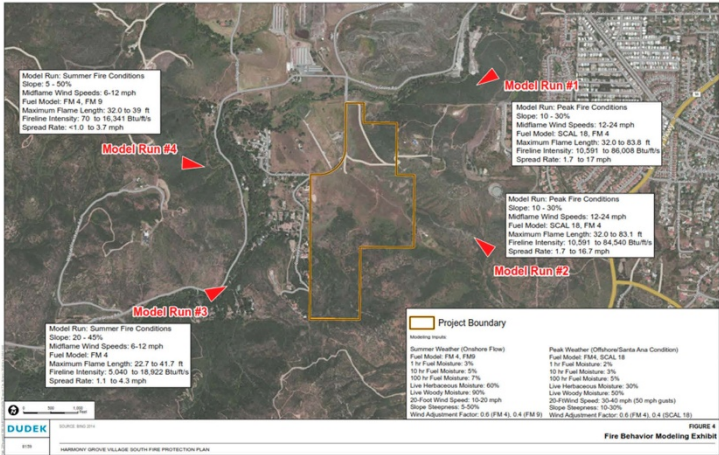
RESPONSES

Comment Letter I39b

Country Club Drive in that 30 minute window, or if that means these vehicles will be able to evacuate Harmony Grove into the city of Escondido or San Marcos, as in past incidents major portions of the entire community were inundated with fire and simply moving from one area of the community to another was not sufficient evacuation. Further, law enforcement personnel assigned to traffic control in past major incidents have directed residents completely out of the valley into Escondido or San Marcos and have not allowed them to simply re-locate within the community.

During the Cocos fire traffic grid lock leaving Harmony Grove into Escondido and San Marcos was approximately an hour at one point, putting people in possibly the most hazardous situation, trapped in their cars on a narrow chaparral lined road (Harmony Grove Road east of Country Club Drive).



The fire modeling scenarios noted in the FPP (Figure 4-below), indicates fire speeds of up to 17 mph coming down the Escondido Creek canyon from the area of the western border of the City of Escondido. This is a likely ignition point since there is a homeless encampment in the creek within the Escondido city limits just east of the County line. This is about 1.2 miles from the intersection of Harmony Grove Road and Country Club Drive and a flame speed of 17 mph is covering just under 25' per second. 1.2 miles is 6336' and at 25' per second the fire line would be expected to reach the single way in and out of HGVS from the city limits of Escondido is approximately 4 minutes. This is far less time than the best case scenario of a 30 minute evacuation time of the project and in a situation like this, the community is now in a shelter in place situation.






I39b-5

The plan does not clearly state to where this 30 minute evacuation time gets the residents from HGVS, and the surrounding existing residents. Is it merely to the intersection of Harmony Grove Road and Country Club Drive, or is it completely out of Harmony Grove into Escondido or San Marcos? If it is the

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter I39b</p> <p>former, considering past evacuation orders and practices, shouldn't the FPP consider "evacuation" to mean completely out of Harmony Grove into either Escondido or San Marcos? While parts of the under-construction Harmony Grove Village just north of the proposed HGVS might be considered a shelter in place location, especially on the improved and widened portion of Country Club Drive between Harmony Grove Road and Harmony Grove Village Drive and the "4th of July Park in the center of the project, these areas in total not have the capacity to become a parking lot for hundreds of sheltering cars, truck, horse trailers, etc. Other locations in Harmony Grove Village are also noted as potential shelter in place locations. Will LE and fire personnel actually allow and direct residents to shelter in place in these locations? What is the actual capacity of these locations? Will they be overwhelmed in a mass evacuation of the valley?</p> <p>Further, the FPP does not seem to take into account the presence of numerous large animals on the semi-rural and rural properties surrounding these suburban and urban projects. The conditions on the roadways during these incidents with horse trailer and rescue organizations operating in the community are significantly impacted and this does not appear to be accounted for in the FPP.</p> <p>On page 37 and continuing on page 38, under Community Evacuation Planning Coordination with Office of Emergency Services, it states;</p> <p>The project will work with evacuation coordinators at the San Diego County OES and San Diego Sheriff's offices. A key to any evacuation of a large number of people is controlling the intersections downstream of the evacuating population. To that end, evacuation routes available to the HGVS project will be identified and prioritized and key intersections mapped and shared with OES and the Sheriff's office. Integration of this information into pre-planned evacuation scenarios will assist these agencies in mobilizing the necessary number of officers to control these key intersections for movement of HGVS residents during an emergency situation.</p> <p>As mentioned in the beginning of this comment letter, I have 30 years of law enforcement experience (LE) with both San Diego Sheriff's Department and San Diego Police Department. In those 30 years I have been involved in major wildland fire scenes and assisted with evacuation and traffic control. Having at least minimal understanding of the typical staffing levels of local LE agencies in and around Harmony Grove (Sheriff's Department, Escondido PD, Highway Patrol) and the number of intersections that would require traffic control in order to have any hope of an efficient evacuation that would not leave resident trapped in their vehicles in hazardous conditions, the reality is that there will not be sufficient LE personnel available to man all of the intersections required to affect a safe evacuation of Harmony Grove upon buildout of Harmony Grove Village and HGVS. And that is assuming that no other major fire events are happening simultaneously, as often is the case during a Santa Ana weather event.</p> <p>Note the traffic and evacuation issues that were experienced by local residents during the 2014 Cocos as documented by local media sources (http://www.sandiegouniontribune.com/sdut-san-elijo-traffic-review-cocos-fire-san-marcos-2014jun07-story.html).</p> <p style="text-align: center;">10</p>	<p>Response to Comment I39b-6</p> <p>The comment quotes pages 37 and 38 regarding the need to control intersections during wildfire emergency evacuations, requiring no response as it does not raise variances with the EIR. The commenter's personal experience regarding traffic control and law enforcement staffing limitations is added to the record. Please refer to Responses to Comments I39b-1 through I39b-5 for additional information regarding evacuations.</p> <p>Response to Comment I39b-7</p> <p>The commenter's Cocos Fire evacuation information and photographs, and maps are noted and are not at variance with the Project's EIR. Photographs and comparison of the 2015 Cajon Pass wildland fire are also noted. The Cajon Pass wildfire that encroached upon and crossed the I-15 is one example of a roadway that crosses unmaintained fuels with no nearby fuel modification zones or buffers from urban development. There are many roads similar to this in San Diego County. Wherever roads occur that traverse areas of unmaintained fuels, there is a potential risk to vehicles and their passengers. That very risk is a driving force behind present-day fire protection planning in San Diego County. It is not feasible to construct roadways near populated areas that can handle the number of people over a short timeframe that may need to use them during a region-wide, mass evacuation. Even the multi-lane freeways, like I-5, I-8, and I-15 in San Diego County become congested for hours each morning and evening, and following accidents. Mass evacuations, due to any type of emergency, cannot be based on short time frames because the roadways cannot accommodate the number of people that would use them. This concept applies to the Harmony Grove area and was considered in the Project's FPP analysis and confirmed by the RSFFPD, the County, and Rohde & Associates. If an emergency does not allow enough time to safely evacuate the Project's residents, then a contingency plan will be available. This contingency plan is not available to all communities that are not built and maintained to highly ignition-resistant levels.</p>


COMMENTS	RESPONSES
<p data-bbox="751 235 936 256">Comment Letter I39b</p>  <p data-bbox="220 730 915 773">Traffic backs up along San Elijo Road at its intersection with Elfin Forest Road during the Cocos fire on May 14. (Photo courtesy Randy Houghton) SDUT</p> <p data-bbox="220 821 926 863">And this article from KPBS (http://www.kpbs.org/news/2015/may/13/harmony-grove-residents-worry-about-evacuation-rout/) with this accompanying map:</p> 	<p data-bbox="1075 170 1990 277">However, this concept is becoming an important evacuation component in new communities in Southern California and offers a safety net for the possibility that evacuation of all residents is not possible.</p> <p data-bbox="1075 313 1990 378">Please refer to Responses to Comments I39b-1 through I39b-5 for detailed response to wildfire evacuation planning for HGV South.</p>

COMMENTS	RESPONSES
<div data-bbox="751 232 940 256" data-label="Section-Header"><p>Comment Letter I39b</p></div> <div data-bbox="216 310 957 509" data-label="Text"><p>It is quite likely that in order to evacuate Harmony Grove in an effective and timely manner, at least 10-12 intersections would have to be staffed by LE personnel in the cities of Escondido and San Marcos. Again, this is just for Harmony Grove and does not assume any other incident or the added complication of San Elijo Hills and Elfin Forest requiring evacuation simultaneously to the west, as was the case in the Cocos fire in 2014. The best chance of a safe evacuation would be to make the call to evacuate when weather conditions create high fire danger, for example, humidity under 20% and wind speeds of over 20 mph. Once the fires start all fire and LE resources become spread too thin too quick for any plan as outlined in this FPP to actually work. The best case scenario as put forth in this FPP is a very highly unlikely scenario which then forces the community into a shelter in place situation.</p></div> <div data-bbox="216 522 957 610" data-label="Text"><p>The risk of residents being trapped in their vehicles is a very real, as demonstrated in a recent incident in 2015 on the Cajon Pass of I-15 in which a wildland fire crossed I-15 and burned over 20 vehicles stopped in grid locked traffic. The following photos are from an incident on 5/17/15 (http://www.cnn.com/2015/07/17/us/california-freeway-fire/index.html).</p></div> <div data-bbox="218 657 533 836" data-label="Image">An aerial photograph showing a wildfire on a multi-lane highway. A fire truck is visible on the left side of the road, and thick black smoke is rising from the fire area.</div> <div data-bbox="550 657 863 836" data-label="Image">An aerial photograph showing a wildfire on a highway. Numerous vehicles are stopped in traffic, and thick black smoke is rising from the fire area.</div> <div data-bbox="218 883 911 1273" data-label="Image">An aerial photograph showing a wildfire on a highway. A large fire truck is visible on the left side of the road, and thick black smoke is rising from the fire area.</div> <div data-bbox="961 751 1018 776" data-label="Text"><p>I39b-7</p></div>	

COMMENTS	RESPONSES
<p style="text-align: center;">Comment Letter I39b</p> <p>This is a situation that had could have easily occurred in the Cocos Fire in either Harmony Grove or Elfin Forest due to insufficient road capacity and insufficient traffic control. Fortunately, in this incident, the fire line was fairly narrow and the chaparral relatively sparse near the roadway. Occupants of the vehicles were able to escape by exiting their vehicles and running perpendicular to the fire line. In many locations in Harmony Grove the conditions would be much more constrained and hazardous.</p> <p>And this incident which just occurred in Portugal in which 62 residents were killed, the majority of victims were trapped in their cars while trying to flee the area:</p> <p>http://fox17online.com/2017/06/18/portugal-fire-victims-burned-in-cars-as-they-fled-62-killed/</p> <p>This occurred in Pedrogao Grande, Portugal, a small town with almost identical environmental and weather patterns as San Diego County, both locations being part of the rare Mediterranean Climates that exist in very few places and frequently suffer through major wildland fires such as these.</p> <p>Secondary Access</p> <p>This is a particularly egregious part of this FPP. While the accepted standard in almost all developments, secondary access has been waived in this FPP because it was found to not be “feasible”. Page 38, under Availability of Alternative Evacuation Route;</p> <p>Availability of Alternative Evacuation Route. Currently 3 to 4 off-site residences have access rights across the HGVS site (Appendix G) that allows these residences to connect to Country Club Drive. The current road does not meet the fire code, varying in width, surface, and grade. This road is accessible by typical passenger vehicles and connects with Johnston Road to the east, but includes a gate at the connection with Johnston Road. Access for these residences will continue to be provided through the HGVS site after development, but via an improved code conforming roadway. However, HGVS does not have reciprocal access rights through these adjacent properties that would allow HGVS access from the project site to Johnston Road to the east. Therefore, HGVS cannot propose using this road to provide secondary access from the project site to Johnston Road. But the roadway would be available for use to connect to Johnson Road (a public roadway to the east) in an emergency situation should Country Club Drive not be available.</p> <p>There are several inaccurate statements in the paragraph. Three residences east of the HGVS site have easement across the HGVS property (my residence included). Only one residence has easement going east to Johnston Road.</p> <p>It states the road is accessible by typical passenger vehicle, which is not true. It is not a maintained road and passes through some of the steepest and most heavily mixed chaparral in the valley, which in itself makes it a questionable option for evacuation.</p> <p>The last sentence states the roadway would be available for in an emergency situation. This is a highly irresponsible and misleading statement. In the two sentences before this sentence, the report admits that HGVS does not have legal access to this unimproved roadway (Alternative 4), but yet asserts in an emergency it could be accessed if Country Club Drive becomes unavailable (an admission that conditions could occur which would block the only access out of this project). Secondly, HGVS would have to have</p>	<p>Response to Comment I39b-8</p> <p>The comment compares a potential evacuation of the Project and surrounding area with that of an evacuation in Portugal but provides no comparison details. A comparison between Portugal and HGV South is not valid because the factors and conditions related to each location are different or unknown. For example, the wildfire in Portugal had different roadway conditions, evacuation process, emergency management oversight, wildland fuels, number of persons and vehicles, distance to safe areas, and options for temporarily refueling on site. The Portugal wildfire was burning in eucalyptus and pine forest, which would produce a much more aggressive fire than the coastal sage scrub and grasslands around the Project site and larger Harmony Grove Valley. Many other fire protection features built into the Project and measures routinely enacted by emergency personnel in San Diego County are not available and were not employed in the Portugal fire. Therefore, neither the FPP nor EIR was revised to additionally include this information.</p> <p>Response to Comment I39b-9</p> <p>The comment includes a quote from page 38 of the Project’s FPP regarding an easement road that connects with Johnston Road to the east. Supposed inaccuracies introduced by the comment are not supported with the information provided. The FPP states that three to four residences have access rights across the HGV South site. The “correction” indicates that three residences have easement across the HGV South property, thus no discrepancy is introduced. The FPP does not indicate that all of the existing properties have easement rights to Johnston Road while the “correction” indicates that only one residence has easement going east to Johnston Road. Again, no discrepancy is documented.</p> <p>The comment regarding Johnston Road’s current condition is noted. The condition of the road was evaluated by the RSFFPD, the County, the Project’s Fire Consultants, and independent fire pre-planning consultants for its potential to be used as secondary access. The result of that analysis indicated that even if access easements could be obtained, improvements to Johnston Road would result in a useable access way, but that would not strictly conform to the Fire Code and a modification/variance would need to be granted.</p>

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<p style="text-align: right;">Comment Letter I39b</p> <p>legal access or easement in order access the road to maintain it to any standard for use in an emergency, which they do not.</p> <p>Further, in section 5 (Analysis of Project Effects-FPP) on page 32, first paragraph, last sentence:</p> <p>However, ultimately, all of the alternatives are infeasible due to the inability to obtain legal access rights from private property owners and the County's preference to avoid enacting eminent domain.</p> <p>In fact I have had at least one formal meeting with the project applicants and several contacts on the property site itself with the applicants. At no time did they, or any representative of this project, ever broach the subject of gaining legal easement across my property in order to create a secondary access route for the project, in spite of the issue of secondary access being brought up in the formal meeting (my residence is listed on Alternative 4). Further, none of my neighbors along the route of Alternative 4 have ever been contacted by the applicant or their representatives regarding an easement in order to gain a secondary access for this project. The statement that the route is infeasible due to the inability to obtain legal access rights is not accurate because no effort has been made by the applicant to discuss this issue with any of the property owners along the route of Alternative 4. Therefore this reasoning should not be included in the DEIR for not providing a secondary access for this project.</p> <p>Under what authority would fire department or LE direct residents on to single lane unimproved road that would send them into a heavily vegetated hillside that is not maintained and does conform to any accepted road standards? This language should be completely removed from the DEIR and the only representation that should remain is there is only one highly vulnerable evacuation route available out of this project.</p> <p>Shelter In Place:</p> <p>While the language in this plan seems to state on some ways this project is a "Shelter in Place" project, it is clear it is not. On page 39 of the Analysis of Project Effects:</p> <p>HGVS Shelter in Place Philosophy (Not Status). The project will incorporate the same fire protection philosophies as Rancho Santa Fe's shelter in place communities, but will not seek shelter in place status. HGVS, like most new communities in San Diego County, will offer the last resort option of temporarily seeking refuge on site if early, safe evacuation is not possible</p> <p style="text-align: center;">14</p>	<p>Based on resident opposition and statement made to the Project applicant regarding the possibility of gaining access easements, it was determined that property owners would not be willing to grant easement rights for any of the alternatives for secondary access presented in the plan.</p> <p>Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I39b-10</p> <p>Please also see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p>

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<p style="text-align: center;">Comment Letter I39b</p> <p>HGVS Community Building: Temporary Refuge/Staging Area. A community building/club house will be provided that is roughly 5,000 square feet in size (Appendix G). Although not planned as an evacuation center, the building would be available for temporary refuge in the event that wildfire prevented an early evacuation from the site for a portion of the residents or fire agencies needed a staging location. A 5,000 square foot building could temporarily refuge up to 330 people for a short duration. The building would be provided:</p> <ul style="list-style-type: none"> ○ Several large-panel television monitors discreetly located so those that are interested may track newscasts during an emergency event ○ Large computer monitors and capable computers for tracking fire incident status <p>The project will incorporate shelter in place philosophies but will not seek shelter in place status? What does this mean? This language is misleading and should be removed. Either the project meets the shelter in place standards or it does not. One of the requirements for shelter in place developments by RSF FD's own published standards is a secondary access and provides a map of evacuation routes for a shelter in place community in the FD's district:</p> <p>https://www.rsfire.org/wp-content/uploads/2016/09/SIP_for_web.pdf</p> <p>"What if I want to leave but the way into my community is blocked by fire?</p> <p>It is important to have at least two ways out of your community, including secondary access routes. (See Evacuation Map on pages 4 and 5.)</p> <p>If all routes are congested, you would be safer in your home than being stuck in traffic trying to evacuate."</p> <p>Then the language (FPP) goes on to talk about a 5,000 square foot building that could shelter up to 330 people for a short duration, but it is "not planned as an evacuation center...". This is confusing to me as a former LE professional. It is vague and confusing as to when and how this building would be utilized. Is it shelter in place? If it holds only 330 people but there are a total of 1,000 residents in the project and surrounding community, how do authorities decide who would be allowed to shelter in this building? Or should we somehow leave those decisions up to panicked residents to decide who has priority in whatever way they deem appropriate in an extremely stressful situation of a wildland fire descending on the community? Will domestic animals be allowed to shelter in the building? Large animals as well as small?</p> <p>Ultimately the project is creating a shelter in place situation for the entire community south of Escondido Creek which is especially hazardous to existing residents whose houses are not built to shelter in place standards. Should the project be required to construct concrete shelter in place fire bunkers on all existing residences since evacuation could easily not be an option in an event of a wildfire</p> <p style="text-align: center;">15</p>	<p style="text-align: center;">I39b-10</p>

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<p style="text-align: center;">Comment Letter I39b</p> <p>combined with the lack of enough shelter in place space on the project site to accommodate the residents and their animals in the event of a wildland fire and blocked escape routes?</p> <p>In these attached articles there is discussion about “qualified immunity” from liability for fire officials who were considered immune from liability even when using inadequate or inferior performance standards. But it also poses the question, is the individual company officer or incident commander equipped for the challenge he may face defending his actions in court following an incident with a particularly high dollar loss, severe firefighter or civilian injury, or catastrophic loss of life? While this discussion relates to decisions at fire incidents, could this project be the test case in which approval of an FPP that deviated so far from industry norms and even department standards and policies that a resultant death or injury of a resident becomes a liability to the fire and county official(s) who approved a deeply flawed FPP? It may well be since it seems to create a hybrid of pseudo shelter in place standards with insufficient evacuation routes/plans.</p> <p>http://www.fireengineering.com/articles/print/volume-157/issue-8/departments/fire-service-court/liability-and-the-incident-commander.html</p> <p>http://www.fedsprotection.com/newsstory/93</p> <p>Is there an example anywhere else in San Diego County of a similarly constrained project that is situated at the end of chaparral lined valley, rated as a high fire hazard zone, with only one vulnerable ingress/egress point?</p>  <p>A safe and functioning FPP needs to be clear and simple because in emergencies conditions residents and public safety officials become stressed and fall back on the basic instinct to run from fire. There is probably no clearer example of this than the book, “Young Men and Fire” written by Norman Mclean of, “A River Runs Through It”, fame. “Young Men and Fire” is Mclean’s chronicle of an actual incident in</p>	<p>Response to Comment I39b-11</p> <p>Links to provided information on qualified immunity are noted and entered into the record. The Project provides the requisite reasoning that modifications are necessary and provides a system of fire protection along with site-specific terrain, fuel, roadway, and risk characteristics that enable the fire official(s) to make a finding that the proposed modification is compliant with the intent and purpose of the Fire Code. Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I39b-12</p> <p>Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I39b-13</p> <p>Fire Protection Plans are planning tools used to summarize the type of fire risk at a given project site and to detail how a proposed project will conform to the applicable Fire and Building Codes (and where it cannot) and how it will provide alternative forms of protection. An evacuation plan should be clear and simple and the Project is committed (FPP page 37) to prepare an “All Risk Emergency Preparedness Plan” which will be easy to read, map-based, and routinely the focus of community outreach.</p> <p>The comment provides examples of firefighters in Montana caught in a wildfire where some tragically lost their lives. This example is not an appropriate comparison for the HGV South Project and is out of context. The Project, as described in Responses to Comments I39b-2 through I39b-11, discuss HGV South’s preferred option of early evacuation and the contingency option to temporarily refuge residents in the comforts of their protected residence. Further, early evacuations would be conducted in vehicles through developed or partially developed (i.e., buffered) travel routes well before a wildfire encroached. This is contrasted with firefighters, miles from urban areas, on foot, with portable fire shelters, as presented in the comment. These are vastly different scenarios that are not fairly comparable.</p>

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<p style="text-align: right;">Comment Letter I39b</p> <p>which most of a crew of US Forest Service smoke jumpers were killed in the Mann Gulch Fire in Montana in 1949. In this excerpt, the moment when the crew is about to be overtaken by a raging wildland fire is graphically described in a fashion that give the reader some idea what it is like to witness and wildland fire in full fury. All of the crew members, with the exception of one, attempted to outrun the fire with devastating results (13 of the crew members were killed). The foreman of the crew, Wagner Dodge, in the middle of attempting to outrun the fire up a 76% slope, attempted to stop his crew and take shelter by lighting a backfire and sheltering in the burned area. It is described in this passage:</p> <p>"It shouldn't be hard to imagine just what most of the crew must have thought when they first looked across the open hill-side and saw their boss seemingly playing with a matchbook in dry grass. Although the Mann Gulch fire occurred early in the history of the Smokejumpers, it is still their special tragedy, the one in which their crew suffered almost a total loss and the only one in which their loss came from the fire itself. It is also the only fire any member of the Forest Service had ever seen or heard of in which the foreman got out ahead of his crew only to light a fire in advance of the fire he and his crew were trying to escape. In case I hadn't understood him the first time, Saltee repeated, "We thought he must have gone nuts." A few minutes later his fire became more spectacular still, when Saltee, having reached the top of the ridge, looked back and saw the foreman enter his own fire and lie down in its hot ashes to let the main fire pass over him."</p> <p>A full excerpt can be read here: http://www.press.uchicago.edu/Misc/Chicago/500616.html</p> <p>And more information can be read here: https://en.wikipedia.org/wiki/Mann_Gulch_Fire</p> <p>This story of one crew member, in the middle of a dramatic and deadly incident, keeping his wits and thinking his way out of a situation that claimed the lives of 13 of his fellow firefighters is an example of the small percentage of people of any given population, even those that are trained in firefighting, that can think and react in counterintuitive ways in the face of mortal danger and not give in to the more common instinct to simply run. And simply running from a fast moving wildland fire is often a fatal mistake.</p> <p>Yet people will run, in spite of the best laid plans of planners, engineers, and public safety officials, and this behavior is what planners, engineers, and public safety officials should prepare for and create plans that allow for people to run (evacuate) to readily identifiable safety. And readily identifiable safety is a place in which most people are no longer witness to the overpowering fury of a wildland fire consuming everything that is flammable in its path.</p> <p>In Dr. Kat Haynes presentation, "Trends in Australian bushfire fatalities over the past 100 years", of the deaths of those that were evacuating, 5% were evacuating to shelter (on foot/in car), 35% were evacuating from shelter (on foot/in car), 70% were evacuation the general area (on foot/in car), and</p> <p style="text-align: center;">17</p>	<p>Further, the comment compares statistics from Australian bushfires with that of San Diego County, again with no context. The statistics provided may very well be applicable in Australia, but it must be noted that fuels, terrain, weather, roadways, fire-fighting resources, and residential construction materials and methods are different, in some cases vastly different, and are not appropriate comparisons.</p>

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<p style="text-align: center;">Comment Letter I39b</p> <p>12% were found in an indefensible refuge (http://www.bushfirecrc.com/sites/default/files/managed/resource/katherine-haynes.pdf)</p> <p>In reviewing the After Action Report for the May 2014 San Diego County Wildfires (http://www.ready.sandiego.org/aar/may-2014-san-diego-county-wildfires/May-2014-San-Diego-County-Wildfires.pdf) In spite of media reports to the contrary (as referenced above) I could find no mention or discussion of any issues with evacuations or traffic control problems at any of the fire scenes. Yet clearly, the act of leaving a place of shelter or potential shelter, and evacuating, can be the most hazardous action to take in a wildland fire by the statistics reflected in Dr. Haynes study. While this 109 page report reviews a multitude of issues and, "lessons learned", it says nothing of the traffic issues and vulnerability that people felt in the communities of Harmony Grove and Elfin Forest during the Cocos Fire. Why was this important issue not discussed in the After Action Plan and why is it not discussed in this FPP? Is it an admission by omission by public safety and planning officials that our region has been grossly over-built in high risk fire zones without the proper road infrastructure, building standards, and safety zones/shelter in place locations? Is HGVS yet another one of these projects that just adds to the problems and hazards of wildland/urban fire interface?</p> <p>In the After Action Report there is reference to the importance of residents evacuating when an evacuation order is given, as if by inference if they heed the warnings of public safety officials in a timely fashion, these traffic issues and evacuations problems would be solved. By merely reviewing the chronology of the Cocos Fire in the report, it appears the residents of San Elijo Hills and Elfin Forest heeded the evacuation warning in a very timely fashion, which lead to the local roadways being overwhelmed and residents being placed in the most hazardous of conditions, stuck on a roadway in a vehicle with an approaching wildland fire.</p> <p>This FPP does not properly address the nature of the community conditions, lack of infrastructure, its constrained valley with very limited ingress/egress, surrounded by heavily vegetated preserved open space, a location in which this type of development, for the type of people who will typically live there. It does not offer a clear and concise evacuation plan because the infrastructure does not exist to facilitate any such plan. It does not take into account what available research indicates about human behavior when confronted with an intense wildland fire and will ultimately create an unsafe environment for the residents of HGVS and the surrounding residents.</p> <p>Sincerely,</p> <p>Kevin Barnard 2708 Country Club Drive Escondido, CA. 92029 858-688-1700 ksbarnard@earthlink.net</p> <p style="text-align: center;">18</p>	<p>Response to Comment I39b-14 Please see the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access.</p> <p>Response to Comment I39b-15 The HGV South FPP utilizes a San Diego County standard for Fire Protection Plan preparation and follows CEQA for determining significance for wildland fire and fire protection. Based on that evaluation, the HGV South Project is not identified as resulting in a clear and significant risk to the lives and safety of existing residents. The Project has undergone thorough review and based on assessment of its relative design features, as well as its design features and required mitigation measures, no significant health and safety risks were identified.</p> <p>The County disagrees that the Project presents a fire risk or would impede evacuations of existing communities. The Project's FPP meets the requirements for Determining Significance for Wildland Fire and Fire Protection (2010), which includes providing a layered approach to fire safety that is customized for a project site and the analyzed fire hazard presented. The 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 (USGS Research 2015, IBHS Mega Fires 2008; both incorporated by reference). Fire behavior has been analyzed, compared to similar fire environments, and accepted by the RSFFPD and the County and confirmed by an independent third-party (fire planning consultant Rohde & Associates) in 2016. While wildfires under extreme wind conditions can be unpredictable, the Project has been designed with a layered system of protections and determined to include the necessary features to perform well during wildfires.</p> <p>With regard to the Project providing a clear and concise evacuation plan, the FPP (page 37) commits the HGV South Project to prepare a Wildland Fire Evacuation Plan for the community and its residents. The FPP is a planning document used to analyze the risk based on site specific features and define how a project will provide fire safety. It is not intended to be an evacuation</p>

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	<p>plan for residents or for responding fire and law enforcement personnel. The Project-specific Wildland Fire Evacuation Plan would be prepared to County standards, using the consistent planning tools, language, and maps so that it is user friendly to residents and can be integrated to county- and city-level emergency planning efforts. This evacuation plan would include easy-to-follow maps and instructions for residents to prepare their own “Ready, Set, Go!” action plans and would be prepared prior to occupation of the site’s structures.</p> <p><u>Response to Comment I39a-20</u></p> <p><u>A series of supporting documents are referenced in the comments in this letter. Each was reviewed prior to authoring the responses to comments in Letter I39a. The notes below summarize the type of documents and location in the responses where related discussion is provided.</u></p> <ol style="list-style-type: none"> <u>1. This is a general resource document focused on the Bay Area and Central Coast. Information on bobcats relevant to the Project is provided in Response to Comment I39a-13.</u> <u>2. The EFHGTC Community Plan (attached in its entirety) is a County planning public document. Plan policies relevant to the Project are addressed in FEIR Section 3.1.5, <i>Land Use and Planning</i>. The Planning process is addressed in Response to Comment I39-5. Please also see the Global Response to General Plan/Community Plan Amendments CEQA Impact Analysis.</u> <u>3. The 1997 Protocol for California gnatcatcher(CAGN) survey is a public document. The use of permitted biologists during protocol surveys is addressed in Response to Comment I39a-9.</u> <u>4. The DFG Bobcat Info Sheet provides general information on bobcat lifespan and territory use patterns. Information on bobcats relevant to the Project is provided in Response to Comment I39a-13.</u> <u>5. This Andren/Oikos document, a Denmark-published resource on habitat fragmentation, is cited in Letter I39. Fragmentation of CAGN habitat is noted, and responded to in Response to Comment I39a-9.</u> <u>6. This attachment consists of a 2009 letter submitted on the Fanita Ranch EIR in the City of Santee. Neither the letter, nor the author appear to be cited in Letter I39. It is possible to refer to FEIR Section 3.1.3, <i>Hazards and Hazardous Materials</i>, the Project Fire Protection Plan (FPP), and the Global Response to Fire Hazards Impact</u>

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	<p><u>Analysis. The letter was submitted on another project in a different jurisdiction. It is not further addressed.</u></p> <p>7. <u>The Sartain and Alberts document is not expressly cited in Letter I39. Fragmentation of CAGN habitat is noted, and responded to in Response to Comment I39a-9.</u></p> <p>8. <u>This article regarding human-started fires is cited and responded to Response to Comment I39a-15.</u></p> <p>9. <u>The Katherine-Haynes article addresses Australian Bush-fires. This article does not address the Project. Please see Response to Comment I39a-15.</u></p> <p>10. <u>This article addresses research in Boone County, Missouri. Response to Comment I39-12 addresses foraging habitat for raptors (a category that includes kestrels).</u></p> <p>11. <u>This attachment references efforts by the adjacent Escondido Creek Conservancy. It is addressed in Response to Comment I39a-14.</u></p> <p>12. <u>This attachment is relevant to the discussion of sensitive chaparral habitat, the open space set-aside and fire issues addressed in Response to Comment I39a-15.</u></p> <p>13. <u>This Wikipedia article addresses a fire event in Montana in 1949 and the lessons learned by the United States Forest Service. Please see FEIR Section 3.1.3, the Project FPP, and the Global Response to Fire Hazards Impact Analysis for information specifically relevant to the Project.</u></p> <p>14. <u>This attachment consists of the May 2014 San Diego County Wildfires After Action Report.” Please see FEIR Section 3.1.3, the Project FPP, and the Global Responses to Fire Hazards Impact Analysis and Adequacy of Emergency Evacuation and Access, for information focused on the Project.</u></p> <p>15. <u>This attachment is an excerpt discussion of the 1949 Montana Mann Gulch Fire book authored by Norman MacClean. Please see FEIR Section 3.1.3, the Project FPP, and the Global Response to Fire Hazards Impact Analysis for information specifically relevant to the Project.</u></p> <p>16. <u>This attachment is news summary regarding a Portugal wildfire that resulted in loss of life as people attempted to flee through forested areas. Please see FEIR Section 3.1.3, the Project FPP, and the Global</u></p>

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	<p><u>Response to Fire Hazards Impact Analysis for information specifically relevant to the Project.</u></p> <p><u>17. This document addresses historical and recent sightings of (and related information addressing) golden eagles in San Diego County. Response to Comment I39-12 addresses foraging habitat for raptors and specifically addresses golden eagles relative to the Project site.</u></p> <p><u>18. This document addresses threats to golden eagles in San Diego County. Response to Comment I39-12 specifically addresses golden eagles relative to the Project site.</u></p> <p><u>19. This attachment addresses potential liability of emergency personnel decisions and direction provided during emergency event. It is not directly applicable to environmental analysis required under CEQA and County guidelines and is not further addressed.</u></p> <p><u>20. This article addresses the Ramona Grasslands, including their history and raptor monitoring. Response to Comment I39-12 addresses foraging habitat for raptors and specifically addresses golden eagles relative to the Project site.</u></p> <p><u>21. This 2012 article addresses southern California housing loss relative to location near wildland fuels. It does not appear to be specifically cited in a comment in Letter I39. Wildfire, wildland fuels, and Project design elements to address those issues are discussed in FEIR Section 3.1.3, the Project FPP, and the Global Response to Fire Hazards Impact Analysis for information specifically relevant to the Project.</u></p> <p><u>22. This 2013 article addresses the Witch and Guejito Fires and structure ignitions. It does not appear to be specifically cited in a comment in Letter I39. Please refer to FEIR Section 3.1.3, the Project FPP, and the Global Response to Fire Hazards Impact Analysis for information specifically relevant to the Project.</u></p> <p><u>23. This 2014 article on San Diego County wildland fires, and fuel management does not appear to be specifically cited in a comment in Letter I39. Please refer to FEIR Section 3.1.3, the Project FPP, and the Global Response to Fire Hazards Impact Analysis for information specifically relevant to the Project.</u></p> <p><u>24. This attachment contains 2015 news reports of fire crossing I-15 and engulfing cars on the freeway. It does not appear to be specifically cited in a comment in Letter I39. Please see FEIR Section 3.1.3, the</u></p>

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	<p data-bbox="1171 168 1892 232"><u>Project FPP, and the Global Response to Fire Hazards Impact Analysis for information specifically relevant to the Project.</u></p> <p data-bbox="1077 274 1980 448"><u>In addition to the documents noted above, files containing videos and still photographs of wildlife and plants were provided by the commenter. Each of these was reviewed during responses to comments to this letter, particularly Response to Comment I39a-10 for species and I39a-17 for dust from blasting activities. The files reviewed were categorized as:</u></p> <ul data-bbox="1125 492 1646 976" style="list-style-type: none"> • <u>CAGN and Spotted Tohees (two videos)</u> • <u>CAGN (15 videos)</u> • <u>Blasting Clouds (two videos)</u> • <u>Rosy boa (one video)</u> • <u>Rosy boa (five photos)</u> • <u>Gopher snake (one photo)</u> • <u>Horned Lizard (two photos)</u> • <u>Ruber (eight photos)</u> • <u>Helleri (two photos)</u> • <u>Western Red Diamond (one video)</u> • <u>Western Red diamond (two photos)</u> • <u>Turkish rugging (one photo)</u> • <u>Mariposa (one photo)</u>