


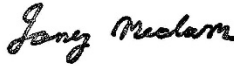


COMMENTS	RESPONSES
<p style="text-align: right;">Comment Letter RS1</p> <p><b>Lisa Maier</b></p> <hr/> <p><b>From:</b> Lee, Jenna@CALFIRE &lt;Jenna.Lee@fire.ca.gov&gt;  <b>Sent:</b> Thursday, March 8, 2018 8:32 AM  <b>To:</b> Smith, Ashley  <b>Cc:</b> Just, Eric@CALFIRE; Schreiner, Greg  <b>Subject:</b> CAL FIRE EIR Comments - Harmony Grove Village South  <b>Attachments:</b> Harmony Grove Village South EIR Comments.pdf</p> <p>Ms. Smith,</p> <p>On behalf of CAL FIRE San Diego Unit Chief Tony Mecham, please see the attached EIR response for Harmony Grove Village South.</p> <p>Respectfully,</p> <p>Jenna Lee  Executive Assistant  CAL FIRE / San Diego County Fire  Office 619-590-3100 Cell 619-599-5447</p> <p>Every Californian should conserve water. Find out how at:</p> <p><b>Save Our Water</b>   <a href="http://SaveOurWater.com">SaveOurWater.com</a> • <a href="http://Drought.CA.gov">Drought.CA.gov</a></p> <p style="text-align: center;">1</p>	

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<p style="text-align: center;"><b>Comment Letter RS1</b></p> <hr/> <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 45%;"> <p>STATE OF CALIFORNIA — NATURAL RESOURCES AGENCY</p>  <p><b>DEPARTMENT OF FORESTRY AND FIRE PROTECTION</b>  San Diego Unit  2249 Jamacha Road  El Cajon, CA 92019  (619) 584-3100  Website: www.fire.ca.gov</p> </div> <div style="width: 45%; text-align: right;">   Edmund G. Brown Jr., Governor </div> </div> <p style="text-align: center;">March 7, 2018</p> <p>Ashley Smith, Planning &amp; Development Services  County of San Diego  5510 Overland Avenue, Suite 310  San Diego, CA 92123</p> <p>Via email to: <a href="mailto:Ashley.Smith2@sdcounty.ca.gov">Ashley.Smith2@sdcounty.ca.gov</a></p> <p><b>RE: COMMENTS FOR THE RECIRCULATION OF THE DRAFT EIR FOR THE HARMONY GROVE VILLAGE SOUTH PROJECT - PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDSXXXX-HLP-XXX, LOG NO. PDS2015-ER-15-08-006; SCH NO. 2015081071</b></p> <p style="text-align: center;"><b>PROJECT REVIEW INPUT  AS REQUIRED BY THE  CALIFORNIA ENVIRONMENTAL QUALITY ACT  AND  FIRE SAFE REGULATION</b></p> <p><b>Authority Cited</b></p> <p>The above-referenced environmental document was submitted to CAL FIRE for review under the California Environmental Quality Act (CEQA) because the proposed project resides wholly, or in part, within State Responsibility Area (SRA), as defined in the Public Resources Code (PRC) § 4126-4127; and the California Code of Regulations (CCR) Title 14, Division 1.5, Article 1, § 1220-1220. 5. In addition to Defensible Space, CAL FIRE has responsibility for enforcement of basic fire safety regulations on all proposed construction and development within SRA as defined under PRC § 4290 (Ref: PRC § 4290-4291 and CCR Title 14 Natural Resources Division, 1.5 Department of Forestry, Chapter 7 – Fire Protection, Subchapter 2 - SRA Fire Safe Regulations). These regulations, known as “SRA Fire Safe Regulations,” constitute the basic wildland fire protection standards for all proposed construction and development within SRA.</p> <p><b>General</b></p> <p>CAL FIRE is not the lead agency in planning and development and project permitting. Each County's Board of Supervisors retains lead agency status and usually delegates this function to their planning departments. CAL FIRE cannot provide individual project map reviews and redesign orders as done by County Planning Department staff professionals. Under state law, only the county planning departments may provide professional planning services and charge fees for this function. CAL FIRE provides input as a contributing agency, generally limited to plan review, and is not the approving agency for these projects.</p> <p>California Government code section (GC) § 66474.02 within the Subdivision Map Act states, in part, that before approving a tentative map, or a parcel map for which a tentative map was not required, for an area located in SRA or a very high fire hazard severity zone, as defined in Section 51177, a legislative body of a city/county shall, with certain exceptions, make the following specific findings:</p> <ol style="list-style-type: none"> <li>1. A finding supported by substantial evidence in the record that the design and location of each lot in the subdivision, and the subdivision as a whole, are consistent with any applicable regulations adopted by the State Board of Forestry and Fire Protection pursuant to PRC § 4290 and 4291.</li> <li>2. A finding supported by substantial evidence in the record that structural fire protection and suppression services will be available for the subdivision through any of the following entities:</li> </ol> <p style="text-align: center;"><i>“The Department of Forestry and Fire Protection serves and safeguards the people and protects the property and resources of California.”</i></p>	<p><b>Response to Comment RS1-1</b></p> <p>The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the RDEIR pursuant to CEQA Guidelines Section 15088.5(c). For a full description of the scope of recirculation for this EIR, please see the Recirculation Readers Guide, dated February 22, 2018. The County concurs with the description of CAL FIRE authority and responsibility areas.</p>

RS-1

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<p style="text-align: center;"><b>Comment Letter RS1</b></p> <p>(A) A county, city, special district, political subdivision of the state, or another entity organized solely to provide fire protection services that is monitored and funded by a county or other public entity.  (B) The Department of Forestry and Fire Protection by contract entered into pursuant to PRC § 4133, 4142, or 4144.</p> <p>3. A finding that to the extent practicable, ingress and egress for the subdivision meets the regulations regarding road standards for fire equipment access adopted pursuant to PRC § 4290 and any applicable local ordinance.</p> <p><b>Local Responsibility Areas</b></p> <p>CAL FIRE has no fire safe input on projects wholly contained within Local Responsibility Area (LRA). However, CAL FIRE is concerned with LRA land adjacent to (SRA) land where an uncontrolled fire may threaten SRA lands. In those areas, CAL FIRE recommends that local standards are enforced that are equal to, or more restrictive than, those CAL FIRE requires for SRA lands.</p> <p><b>State Responsibility Areas</b></p> <p>The State Board of Forestry &amp; Fire Protection recognizes CAL FIRE's primary fire protection responsibilities are on lands declared by the Board to be SRA. The SRA Fire Safe Regulations were prepared and adopted for the purposes of establishing minimum wildfire protection standards in conjunction with building, construction, and development in SRA. These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction approved after January 1, 1991. The regulations include minimum standards for the following:</p> <ol style="list-style-type: none"> <li>1) Road standards for fire equipment access.</li> <li>2) Standards for signs identifying streets, roads, and buildings.</li> <li>3) Minimum private water supply reserves for emergency fire use.</li> <li>4) Fuel breaks and greenbelts</li> </ol> <p>These regulations do not supersede local regulations which equal or exceed minimum regulations adopted by the State. Additionally, exceptions to these standards may be allowed by the inspection entity listed in 14 CCR § 1270.05, where the exceptions provide the same overall practical effect as these regulations. Exceptions granted by the inspection entity listed in 14 CCR § 1270.05 shall be made on a case-by-case basis only.</p> <p>Based on the aforementioned regulations and the authorities granted by the State, CAL FIRE requests that you address the following comment(s) in the Safari Highlands Ranch &amp; SOI Update Draft EIR:</p> <ol style="list-style-type: none"> <li>1. Please demonstrate, in the form of written evidence, compliance with established minimum wildfire protection standards as described under CCR Title 14 Natural Resources Division, 1.5 Department of Forestry, Chapter 7 – Fire Protection, Subchapter 2 - SRA Fire Safe Regulations.</li> </ol> <p>Thank you for your consideration of these comment(s). CAL FIRE appreciates your efforts to address these critical issues.</p> <p>Sincerely,</p> <p style="text-align: center;"></p> <p><b>Tony Mecham</b>  Unit and County Fire Chief  <b>CAL FIRE San Diego</b>  Proudly serving San Diego County Fire, Deer Springs Fire Protection District, Ramona Municipal Water District and the Yuima Water District.</p> <p style="text-align: right;">RS-1 RS-2</p>	<p><b>Response to Comment RS1-2</b></p> <p>This comment relates to an issue outside the scope of recirculation pursuant to CEQA Guidelines Section 15088.5(c). For a full description of the scope of recirculation for this EIR, please see the Recirculation Readers Guide, dated February 22, 2018.</p> <p>It is also unclear if this comment was intended for the Proposed Project (the subject states “Safari Highlands”). Assuming that it is, as requested in this comment, the Project is consistent with the protection standards described under California Code of Regulations Title 14 Natural Resources Division, 1.5 Department of Forestry, Chapter 7 – Fire Protection, Subchapter 2 – SRA Fire Safe Regulations. The Project Fire Protection Plan (FPP) states that:</p> <p style="text-align: center;"><i>This FPP is consistent with the County Consolidated Fire Code (2014 CCFC and 2014 CFC Ordinance #10337) and with the California Code of Regulations, Title 14, Fire Safe Regulations. Since the project is within SRA, Title 14 is applicable, and allows provisions for providing same practical effect for any non-conforming project features.</i></p> <p>Those provisions are detailed within the FPP and summarized in the Project EIR in Table 1-2, <i>Project Design Features</i>, and Section 3.1.3, <i>Hazards and Hazardous Materials</i>, as well as in Chapter 7.0, <i>List of Mitigation Measures and Project Design Features</i>. This topic is also addressed in the Final EIR (FEIR) in the Global Responses in Sections 8.3.3, <i>Fire Hazards Impact Analysis</i>, and 8.3.4, <i>Adequacy of Emergency Evacuation and Access</i>.</p>