

Wildfire Risk Review of SDC Specific Plan and DEIR for public comment

General comments

Page 506: "Criterion 1: Will the project Substantially impair an adopted emergency response plan or emergency evacuation plan"

- This Criterion question is flawed because it only addresses potential impacts to the emergency plans and not the emergency actions. The criterion should be asking whether the project will substantially impair the emergency response or emergency evacuation, not the adopted plans. The project may render the plans meaningless, but would not impair them. The real risk of the project is to the emergency response and to the actual evacuation, which are not demonstrated to be mitigated by the proposed project.
- Other Criterion questions should be evaluated for similarly flawed language that obfuscates the intent of the criterion. The development of emergency plans or the on-site adherence to local codes and regulations does not translate to mitigation (much less self-mitigation) of actual hazards, cumulative impacts posed by project scale, nor the regional impacts of the proposed project at full build-out.

Fire risk associated with the proposed large-scale development and associated population increase

Table ES 2 Summary of Impacts, 3.8-7, Implementation of the Proposed Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

- This statement disregards the risks of cumulative regional impacts of the proposed development. The large-scale project will significantly increase the population of Glen Ellen/Eldridge and increase wildfire risk due to increased human activity on the land and on the road. The doubling of the local population will inherently increase the risk of wildfire ignitions and the risk of evacuation gridlock. Residents will be at significant risk of loss, injury and death in traffic jams during a catastrophic wildfire and/or mandatory emergency evacuation.
- The analysis of wildfire risk mitigation appears to be limited to construction within the proposed project area and relies heavily on existing regulations and best management practices for fire safe construction and defensible space. These practices do not mitigate the inherent risks associated with living in the midst of a moderate to high fire hazard severity zone. Wildfire in the area will produce extended periods of poor air quality and will likely require mandatory evacuations, which pose significant risks that are not mitigated by the plan.
- The DEIR calls for the "requirement" of a shelter-in-place facility at SDC after 200 homes are built. There is no proven rationale for sheltering in place particularly in a High Fire Risk Area.

- The DEIR and Self-Mitigating SDC Specific Plan do not demonstrate how the risk of wildfire hazards caused by the cumulative regional impacts of this large-scale project will be reduced to insignificant levels.

Fire risk associated with emergency (wildfire) evacuation

Table ES-2 Summary of Impacts

3.8-6. Implementation of the Proposed Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- The authors of the plan conclude in their various wildfire evacuation scenarios that there would be no significant increases in evacuation times with the completed project. Tables show evacuation times in the order of 15-20 minutes, with and without the proposed project. The Evacuation Time analysis suggests that “added times” for travel during an evacuation range from 1 or 2 minutes to 37 minutes to get to Napa. These hypothetical scenarios defy reality and the actual evacuation times experienced by residents during recent fires:
 - Nuns Canyon fire (2017) resulted in evacuation times out of Sonoma Valley of 1 hour or more.
 - Glass fire (2020) resulted in evacuation times from nearby Oakmont onto Hwy 12 of one to two hours.
 - Evacuations from Kenwood during recent fires took hours, not minutes.
- **QUESTION:** what were their underlying assumptions? Is there some modification in circumstances from previous fires they are applying to arrive at the quick evacuation figures? Granted, the Nuns fire was accompanied by several other fires that cut off other evacuation routes, channeling all of Sonoma Valley into Stage Gulch Road, but that is the actual situation that occurred and should be evaluated. How much more time would it take an existing resident to evacuate if 1000 more homes and 2000 more cars were on the roads?
- **QUESTION:** Does the plan assume that other communities north of those mapped won't be evacuating south down Hwy 12 and Arnold Drive? A fast-moving fire on Hood Mountain and Sugarloaf headed south (like the Glass or Tubbs fire) might evacuate all residents from Oakmont down to Sonoma. The scenarios presented appear to propose more isolated evacuation zones, and did not consider a more likely large-scale evacuation that includes Kenwood and Oakmont residents simultaneously driving south through the project area.
- **QUESTION:** What do the local fire marshal and sheriff think of this statement from the DEIR: “The estimated changes in travel times caused by the Proposed Plan would not require changes in current evacuation routes or plans. Thus,

implementation of the Proposed Plan would not impair an emergency response or emergency evacuation plan and impacts would be less than significant.”

- The Specific Plan does not address regional or cumulative impacts of the development on surrounding communities, including the ability of existing residents to evacuate safely through, or beyond, the proposed project area.
- The Specific Plan and DEIR do not address the limitations of existing arterial and feeder road capacity on residential safety during a wildfire event. The claim that the project is self-mitigating is only true for mitigating on-site egress to an alternate thoroughfare and does not address the cumulative impacts of the additional traffic the proposed project will contribute regionally during a major wildfire and/or a mandatory evacuation.
- 1000 new households and up to 2000 vehicles will be evacuating from the new project site, further exacerbating existing gridlock on Arnold Drive.
- During a wildfire, most residents within the proposed project area will not be able to take the proposed connector route to highway 12 due to the high probability wildfire will be advancing from this very high fire risk area along highway 12, as documented from recent history. (see Specific Plan, figure 2.3-1). Ironically, the only time the connector route would be really needed is when there is a wildfire and the road is unsafe to use.
- Previous traffic studies revealed an F rating with the proposed project development and population increase. It appears that the plan can only be self-mitigating as long as all new residents do not drive beyond the project perimeter.
- A realistic evaluation of the cumulative regional impacts of the proposed plan would most likely require the addition of additional lanes on both Hwy 12 and Arnold Drive the full length of the valley to accommodate this large-scale development and provide effective conveyance during emergency evacuations.
- **QUESTION:** Why wasn't a regional plan to improve major arteries and feeder roads considered and modeled in the analysis of this project? These improvements should be considered for inclusion in the Specific Plan and included as a requirement of project approval.

Fire risk associated with planning and construction

Page 507-509 Regarding "Open Space and Resources and Hazards":

"Goals: 2F Wildfire Hazards: Provide protections at the site against the growing risk of climate change exacerbated wildfire hazards and limit the potential impacts of wildfire to development through intelligent site and building design, and open space management."

- It is important that the source materials for these requirements be the most scientifically sound and current - not static. Current guidelines are incomplete and already outdated as currently written. The research is continuously evolving and being updated.

- The attached Wildfire Prepared Home Plus IIBHS standards are the most current version for firesafe structures, and these standards will change. Project policies should require adherence to the most current edition.
- It is critical that all new and retrofitted buildings meet the Wildfire Prepared Home standards.
- Regarding Fire Hazard Severity Zones: on page 518 the authors state: "As shown in Figure 3.16-1, CAL FIRE has mapped the moderate, high, and very high Fire Hazard Severity Zones (FHSZs) within the Planning Area. The Proposed Plan would result in the construction ...within the Core Campus, which is not located within any of these FHSZs." This statement IS INCORRECT and misleading, since CALFIRE doesn't map Hazard Severity Zones in the LRA (Local Responsibility Area) and the core campus is in the LRA. However, the campus lies between CALFIRE mapped areas closely adjacent, immediately to the east is a Moderate FHSZ and west is a High FHSZ. It can logically and necessarily be assumed that the core campus, if mapped by CALFIRE, would be in either the High or Moderate FHSZ.
- Climate change is directly associated with land conversion associated with population growth. The plan calls for policies that require strict vegetation management and maintenance of buffer zones around development for defensible space that mitigates wildfire hazards.
- The proposed project risks diminishing vegetation critical to carbon sequestration, thereby contributing to climate change and wildfire risk. The maintenance of intensely managed buffer zones around the large-scale housing development will cumulatively increase the risk of climate change.
- Current setbacks from creeks and open space are inadequate according to current defensible space guidelines. The proposed buffer zone for defensible space around the project perimeter, or wildland urban interface, risks encroachment into the currently defined open space, riparian and wildlife corridors, which will reduce the size, function, and viability of the habitat corridors or put residents at risk.
- The footprint of the proposed project should contain the buffer zones within the designated core campus development zone where active vegetation management is required for fire protection and public safety.

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