



Preserve Wild Santee

July 13, 2020

Chris Jacobs, Principal Planner
Department of Development Services
Santee City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071
Email: cjacobs@cityofsanteeca.gov

RE: Fanita Draft Revised EIR (DREIR)

Mr. Jacobs,

Preserve Wild Santee is a community environmental organization that has consistently advocated since 1994 to protect quality-of-life for residents and special status wildlife unique to our scenic geography. Preserve Wild Santee led the successful referendum that defeated the nearly 3,000-unit Fanita subdivision in 1999 by a landslide 2/3 vote.

In fact, Preserve Wild Santee volunteers have gathered over 25,000 signatures throughout the city on Fanita related initiatives and referendum between 1998 and 2018. These signatures and our other legal efforts should make it clear that Santee residents oppose a massive project with unavoidable significant impacts on Fanita. Santee residents prefer conservation of the site as an extension of Mission Trails Regional Park, which has been expanding, in part, due to Preserve Wild Santee conservation efforts.

Yet, here we are again with a massive project proposal that has significant unavoidable impacts to the environment and violates the Santee General Plan. Our comments upon the Fanita Ranch Draft Revised EIR (DREIR) follow.

"...many of the political leaders we elect and planning agencies we depend upon to create safe communities have failed us. They have allowed developers to build in harm's way, and left firefighters holding the bag."

"Planning agencies need to push back against pro-development forces in government, whose willingness to build in known fire corridors borders on criminal neglect...Such policies would cost significantly less than the \$9.4 billion wildfire-related claims submitted statewide as of Friday. [2017]"

"...we are choosing to spread cities farther and farther out into wildland areas, we need to recognize that fire disasters aren't natural, they're social."¹

¹ Richard W. Halsey. https://www.latimes.com/opinion/op-ed/la-oe-halsey-socal-fires-why-20171207-story.html?fbclid=IwAR3vRjR95_Tx9niR3ce63hPFesDAT2F280_x9aAla9ZQITSD48jKslrQdic

DUDEK & Associates fined by the enforcement division of the California Fair Political Practices Commission (FPPC)

The City, as lead agency and by choice of the applicant, for preparation of Wildfire and Biological reports, has relied upon a firm that has demonstrated clear bias in favor of project approval. Dudek & Associates was fined for laundering campaign contributions to a pro-Fanita Ranch incumbent running for reelection. [AR I:193:018971-72, 019375, 019377] Conclusions of the Dudek prepared 2020 Fire Protection Plan differ significantly on terms favorable to the applicant from the conclusions of experts who prepared the 2007 FPP.

Dudek & Associates, 2000/01898 (2000)

***84300 & 84301 - 2 counts**

\$3,600

“Dudek & Associates...laundered campaign contributions to a candidate for the Santee City Council in 1998.” [FPPC Appendix IV, Summary of Enforcement Decisions, p. 83]

4.18 Wildfire

The FPP fails, in part, because it is framed by an attempt to protect a predetermined project footprint. The FPP approaches the land use plan as a given. Potential fire intensity should have been a primary factor that influenced where development would be located on the site.²

Instead of considering the diverse topography and vegetation of the site, the regional alignment with a vast open space fire corridor and the potential for specific portions of the site to burn at high intensity with a thoughtful effort to develop a lower risk design footprint, the FPP attempts to mitigate development on locations at higher risk by utilizing ignition resistant structures and extending Fuel Management Zones (FMZ) to new extremes. The 2020 FPP also abandons the 2007 FPP's requirement to reduce fuel accumulation in the open space preserve. [AR 018488]

This is a recipe for disaster and it is an example of why CAL FIRE Director Ken Pimlott stated prior to his departure that development in Very High Fire Hazard Severity Zones (VHFHSZ) should stop. It's why the legislature is considering such prohibition with SB 474.

*"California's increasingly deadly and destructive wildfires have become so unpredictable that government officials should consider banning home construction in vulnerable areas, the state's top firefighter says...Officials must consider prohibiting construction in particularly vulnerable areas, said Pimlott, who has led the agency through the last eight years under termed-out Gov. Jerry Brown. He said it's uncertain if those decisions should be made by local land managers or at the state level as legislative leaders have suggested. But Pimlott said, "we owe it" to homeowners, firefighters and communities "so that they don't have to keep going through what we're going through." "We've got to continue to raise the bar on what we're doing and local land-use planning decisions have to be part of that discussion," he said...He said he has seen fire conditions worsen each passing year during his three decades with the agency, taking its toll on residents and firefighters alike. "Folks can say what they want to say, but firefighters are living climate change. It's staring them in the face every day," he said. To adapt...City planners must prepare communities "unlike we ever have before" with easy evacuation routes and new evacuation centers. And he said Californians must treat "red flag" extreme fire danger warnings the way Midwesterners treat tornado warnings — as imminent threats."*³

Significant wildfire risk could be avoided by eliminating or relocating the "Vineyard Village" island of development proposed for the northeast high elevation portions of the site to be embedded within chaparral.

Nor does the FPP offer a single thought on the trend of increasing weather extremes due to the acceleration of climate breakdown (including droughts and Santa Ana winds of greater intensity).

If the trend of record setting high temperatures continues, including severe periods of drought with extended fire seasons, what are the projections for fire intensity on site and the already extreme FMZs?

² Patricia M. Alexander. <https://esajournals.onlinelibrary.wiley.com/doi/pdf/10.1002/eap.1376>

³ <https://www.caprudio.org/articles/2018/12/11/retiring-cal-fire-director-california-must-mull-home-ban-in-fire-prone-areas/> . SB 474 would prohibit subdivisions in VHFHSZ.

The FPP fails to disclose that a wildland fire that transitions into an urban fire generates higher intensity burns with greater duration which has significant implications for safety zones, evacuations, temporary refuge areas, shelter in place and suppression strategies.

Furthermore, the FPP reveals its bias on behalf of the applicant by not even mentioning the potential for cluster burns.

Key Data

4.18-1 “Drying vegetation with **fuel moisture of less than 5 percent** for smaller fuels (which dry faster than larger fuels) is possible during the summer months...”

“Extreme conditions used in **worst-case fire modeling** for the project site include **92° F** temperatures in summer and **winds of up to 50 miles per hour** during the fall based on worst-case conditions from County data sets during the Cedar Fire (in 2003).”

[92° F is not accurate for worst-case fire modeling.] Temperatures on site have exceeded 115° F in spring, summer and fall.

Relative humidity of 12 percent or less is possible during fire season.”

4.18.1.2 Vegetation (Fuels)

“28 vegetation communities...”

“The project is located within the wildland urban interface (WUI) and is statutorily designated a Very High Fire Hazard Severity Zone (VHFHSZ)...”

4.18.1.3 Fire History

“Within 3 miles of the project site, there have been 65 fires recorded by CAL FIRE since 1910 (FRAP 2018)”.

“The most notable fire, the Cedar Fire... was driven by Santa Ana winds, causing the fire to spread at a rate of 3,600 acres per hour.”

4.18.5.2 Threshold 2: Pollutant Concentrations

Would the proposed project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire?

Impact: The proposed project would **not**, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire.

Mitigation: No mitigation is required.”

In fact, the project **would**, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire.”

There are several factors why the conclusion of “no mitigation is required” by the DREIR is false.

The northern portion of the project site is aligned perfectly with the east, northeast Santa Ana wind fire corridor utilized by the Cedar Fire in 2003. The northern portion of Fanita burned in the early morning with a high-intensity flame front that blew by the southern portions of the site like a freight train. Instead of burning in the morning along with homes further west in San Diego, the southern fire flanks burned the southern portion of the site in afternoon and evening reflecting slower fire spread relative to the fire front that rapidly stormed through the northern portion of the site.⁴ The applicant has chosen to locate development in the highest intensity burn zone aligned with the offsite vegetation fire corridor.



Second, the northeast portion of the site has the greatest accumulating biomass. The chaparral vegetation is capable of generating flame lengths in excess of 100-feet under extreme weather conditions. [2007 FPP @ AR II:6:28596, II:6:28606, II:6:28607, AR 009258-009260]

Third, the project proposes to site development above numerous natural fire chimneys aligned with Santa winds and vegetated with dense chaparral. [66 feet flame lengths disclosed by a new FPP in 2020 underestimates potential fire intensity in the northeast chaparral]

BehavePlus 5.0.5		Thu, Jun 25, 2020 at 10:48:06	
Fanita Ranch Santa Ana Condition 1			
Surface Rate of Spread (maximum)		2228.0	ch/h
Flame Length		102.9	ft

⁴ Personal observations while performing structure preparations on the Cedar Fire WUI, at Strathmore Drive, Santee and observing strip firing operations on the western edge of Sycamore Canyon, October 26, 2003.



All of these factors potentially expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire. These are significant impacts that can be avoided by relocating the development sites, realigning the most vulnerable home sites or selling Fanita for conservation.

Tab 2(gg) App P1 Fire Protection Plan and Construction Fire Prevention Plan

Executive Summary

*“The FMZs, when **properly maintained**, have proven effective at minimizing structure ignition from direct flame impingement or radiant heat, especially for structures built to the latest ignition resistant codes. The FMZs for Fanita Ranch would be maintained in perpetuity by the homeowner, homeowner’s association (HOA), Habitat Preserve Organization, a funded Community Services District (CSD), or similarly funded entity.” [viii]*

FPP 2007 concludes **proper maintenance requires** “A fuel treatment program using prescribed fire (Rx) to manage the open space on a planned rotational basis.” [AR 018488]

What is the total distance of WUI around structures and roads that must be maintained? Please disclose by category.

What is the total acreage of WUI FMZs around structures and roads that must be maintained? Please disclose by category.

How many hours and employees are needed to maintain the miles of WUI and acreage to inspection standards?

How many days out of the year on average must power tools used for maintenance halt use at 10 AM due to heat, low humidity, wind and increased risk of ignitions?

As climate continues to break down, how is the time available for maintenance expected to diminish? How might that impact the feasibility of retaining a workforce that has to halt operations by 10 AM or earlier on high-risk days/hours?

Dependence upon HOAs to “properly” maintain FMZs has proven problematic in Santee on the **Sky Ranch** and elsewhere in California.

- (13) **CONFERENCE WITH LEGAL COUNSEL—ANTICIPATED LITIGATION**
(Government Code Sections 54956.9(d)(2) and (4))
Significant exposure to litigation pursuant to paragraph (2) of subdivision (d) of Section 54956.9 and the potential initiation of litigation pursuant to paragraph (4) of subdivision (d) of Section 54956.9 related to Lot L and the FMZ zones at Sky Ranch and involving as potential parties Lennar and the Sky Ranch Homeowners Associations

[Presentation of Sky Ranch resident Michael Root to Santee City Council regarding hazardous vegetation on Lot L, October 23, 2019. And Item 10, February 12, 2020. And February 26, 2020, regarding hazardous Fuel Management Zones including Item 13 Significant Exposure to Anticipated Litigation]

Fanita Ranch owners have had difficulty maintaining the existing WUI. Much of it would not pass a defensible space inspection if conducted by CAL FIRE. [Personal experience as a CAL FIRE DSI and independent reviews of the Fanita WUI]



[Fanita WUI June 15, 2020]

Altering chaparral and shrub lands requires continual maintenance to prevent a conversion into more flammable non-native flash fuels that increase the risk of ignitions. This significant impact is potentially exacerbated by a change to Santee's ordinance, which now calls for a limit of 30% native plants in FMZ 2. Removal of 70% of the native cover guarantees a constant battle with invasive annual flash fuels. This is a significant adverse impact of an intended mitigation measure.

What methods will be relied upon to combat the invasion of flash fuels and what evidence demonstrates these methods would be feasible on the scale of a lengthy WUI?

What are the adverse impacts of any measures proposed to maintain a 30% native/ 70% non-native fuel management zone?

“Santee Municipal Code City Ordinance 570”

4907.2.2 Fuel Modified Defensible Space, Zone Two. “Zone Two” is the second 50 feet of the 100 total feet of defensible space and is measured 50 feet from the structure to a total of 100 feet toward the wildland. Zone Two shall consist of low-growing, fire-resistant shrubs and ground covers. Average height of new plants for re-vegetation should be less than 24 inches. In this Zone, no more than 30% of the native, nonirrigated vegetation shall be retained. This area requires inspection and periodic maintenance. This area shall be maintained by the property owner or applicable homeowners association(s).

2.2.8 Analysis of Wildfire Risk from Adding New Residents

Section 2.2.8 attempts to diminish the risk associated with new residents by acknowledging the increased risk of ignitions - noting “Roadways are a particularly high source of ignitions” but then stating “Approximately 90 to 95 percent of wildfires are controlled below 10 acres (CAL FIRE 2019; Santa Barbara County Fire Department 2019).” [p. 25]

While the statements are true, the suggestion that 5-10% of ignitions that exceed 10 acres are not significant threats is not. These ignitions often cause extensive damage to life and property.

Santee's existing interface with the Fanita Ranch consists of older homes highly susceptible to ember storms. Backfiring from and strip firing near this interface was an important suppression tactic used during the 2003 Cedar Fire. [Personal observation]

The 2007 FPP required preserve open space management to reduce the significant threat from embers to life and property. [AR 018519-23] The requirement to manage the preserve vegetation would have had significant impacts to threatened species, was thus abandoned and became a contentious issue in litigation because the threat from biomass fuels buildup and embers remained significant.

For the 2020 FPP, the addition of a new fire station on Fanita along with new fire access points/roads is likely to result in more rapid initial attack and control of fires under mild to moderate weather conditions. In addition, the new project footprint can provide some shielding for Santee's existing WUI for fires burning under mild to moderate weather conditions. In these instances, fires that would have burned through significant portions of the site under moderate weather conditions will no longer do so. The combined impact of more rapid and effective initial attack with shielding of open space in between existing and new development will add biomass to the shielded preserve area that was formerly burning under moderate weather conditions.

Thus, the project has a two-fold significant adverse impact upon existing development due to increased fuel loads and preclusion of backfiring. The addition of life and property on developed islands to the northeast precludes the ability of strip firing and backfiring from the older WUI as was performed during the 2003 Cedar Fire. This tactic becomes infeasible because new development is now in the path of a backfire ignited from the older WUI. (Note - Backfiring from flanks may be the only effective suppression tactic under severe weather conditions).

At the same time, fuels will accumulate due to the addition of more rapid initial attack and abandonment of the requirement for preserve management to reduce ember impacts as prescribed by the 2007 FPP.

Firestorms under severe weather conditions would still burn through the site, but after project impacts that increase fuels, **at greater intensity.**

“The Santa Ana winds with wind gusts of up to 60 mph blowing from the northeast/east pose a significant threat from wind-blown embers to all structures within this project.” [FPP 2007, AR 018501]

These are significant impacts that must be disclosed, avoided or mitigated by reconfiguration of the development or other means (i.e., hardening existing homes within 1 mile of the existing WUI).

Section 2.2.8 makes a general comparison of high-density housing proposed for the site with low-density housing that is not and never has been proposed in any Santee General Plan. The largest lots (lowest density) housing allowed by Guiding Principle 3 is 1/2- lots for half of the site, with 10,000 sq. feet for 1/4 of the lots and 6,000 sq. feet for the remaining 1/4 of the lots. The General Plan lots allowed are in a range that is between the Section 2.2.8 comparisons. The majority of General Plan consistent homes would be sited at distances apart from each other that are less susceptible to cluster burns from direct flame impingement by a burning adjacent structure. What are the distances between structures for the high-density development proposed on Fanita? What is the potential for direct flame impingement between adjacent structures?

High-density development in a VHFHSZ is susceptible to cluster burns. Homes sited in Figure 6 are susceptible to cluster burns. If Fanita will have similar tight distances between structures, then they would be also. Ignition resistant measures proposed do not make homes fireproof.

“Fire is a dynamic and somewhat unpredictable occurrence and as such, this plan does not guarantee that a fire would not occur or would not result in injury, loss of life or loss of property. There are no warranties, expressed or implied, regarding the suitability or effectiveness of the recommendations and requirements in this plan, under all circumstances.” [2020 FPP p. 102]

3 Determination of Significance Thresholds

“1. Substantially Impair An Adopted Emergency Response Plan/Emergency Evacuation Plan”

What is time estimate for fully evacuating the project site including mobilization time?

All traffic evacuating the site must utilize or cross Mast Boulevard. What are the road capacities and levels of service on Mast Boulevard street segments and other required arteries?

How do time estimates for evacuating the site change with the time of day and LOS on major arteries?

How many residential streets within the project site are oriented north, northeast and east forcing potential driving toward the fire without an alternative? What are the distances for each of these street segments?

Alternative circulation patterns can reduce potential for evacuation panic?

“Project access roads that traverse areas of natural vegetation (consistent with current fuels) would provide a minimum of 50 feet of modified fuel areas along both sides of the road.” [p. 30]

What are the flame lengths estimated on either side of the unmanaged areas these routes traverse?

“2. Due to Slope, Prevailing Winds, and Other Factors, Exacerbate Wildfire Risks and Expose Occupants to Pollutant Concentrations From A Wildfire or Uncontrolled Wildfire Spread”

Under what weather conditions will mechanical construction operations with potential to result in ignitions be halted to protect homes on the existing WUI?

4 Anticipated Fire Behavior

4.12 BehavePlus Analysis

“The sage scrub chaparral habitat on and adjacent to the project site is in varying stages of fire recovery following the 2003 Cedar Fire. As such, fuel loads are expected to increase over time, with mature chaparral potentially reaching continuous cover of 10 to 15 foot tall shrubs on northern, mesic slopes and mature sage scrub reaching 2 to 3 feet tall shrubs on south or southwest facing, drier slopes. Based on the location of modeling scenarios, a fuel model 4 (dry climate shrub with high fuel load representing chamise-chaparral fuels) and a fuel model SH5 (dry climate shrub with moderate fuel load representing sage scrub fuels) were used for all BehavePlus fire behavior modeling runs.” [p. 38]

“...flame lengths can be expected to reach up to approximately 28.2 feet with 19 mph wind speeds (prevailing Summer condition) and 66.1 feet with 41 mph wind speeds (Peak condition). Spread rates range from 1.8 mph (summer) to 10.1 mph (Peak). Spotting distances, where airborne embers can ignite new fires downwind of the initial fire, range from less than a mile (summer weather condition) to 2.8 miles (Peak weather condition). [p. 38]

“A worst-case summer fire (summer condition) would result in a fire spreading at a rate of up to 4.3 miles per hour (mph). During a fall fire with gusty Santa Ana (Peak condition) winds and low fuel moisture, fire is expected to be fast moving at up to 17.3 mph with highest flame length values reaching approximately 66 feet in specific portions of the property. Spotting is projected to occur up to nearly 1.0 mile during a summer fire and nearly 2.8 miles during a fall fire.” [p. 38]

Table 3 BehavePlus Fire Behavior Modeling Results are correct for the model inputs utilized. However, **adjusting variables, such as for lower humidity, would yield greater fire intensity / flame lengths.**

“Model results should be used as a basis for planning only, as actual fire behavior for a given location will be affected by many factors, including unique weather patterns, small-scale topographic variations, or changing vegetation patterns. [p. 40]

Modern structures lost in recent fires



Many of the homes destroyed on Andorra Lane were ignited by embers, not by walls of flame, experts say. (Photo by Morgan Lieberman/KPCC)

The FPP fails to disclose and discuss the loss of fire resistant homes built with upgraded Chapter 7A code. Fires in Ventura County (2017 Thomas Fire) and Butte County (2018 Camp Fire) are examples. In Ventura 4 of the 9 homes in the new subdivision burned.

“Almost no one expected it. After all, the homes were brand new. They were surrounded by dozens of other homes. And most importantly, they met the state’s building codes for areas at heightened risk of wildfires.

“Ventura City Fire Marshal Joe Morelli thinks topography played a role...And even with the fire-resistant construction standards you can still have loss. They’re not fireproof standards.”

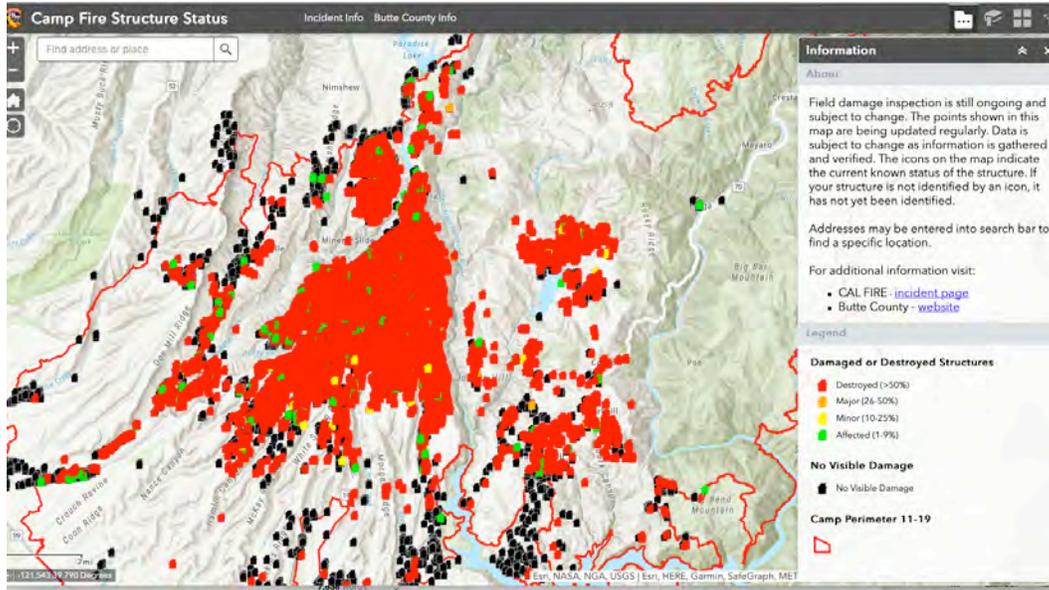
“According to Cal Fire data, 80 percent of houses destroyed in the Thomas Fire had fire-resistant exteriors and 90 percent had fire-resistant roofs.”

“Where you build your home is more important than what materials you build it from, says fire ecologist Alexandra Syphard”

“To fire ecologist Alexandra Syphard with the Conservation Biology Institute, it’s becoming increasingly clear that houses built in risky places are impossible to fireproof. “You can make a big difference in increasing the potential safety of your house, but you can’t guarantee that it’s not going to burn,” she said. Her

research has found that where you build your house, not what it's made of, is the biggest factor in determining whether it will burn.”⁵

In the Butte County, Camp Fire, **41% of the homes totally destroyed** in the fire path were built with modern, post 2008 Chapter 7A code.⁶



Camp Fire path of destruction

5 Emergency Response and Service

California fires under Santa Ana wind conditions have rapidly expanding flame fronts that quickly overwhelm resource capabilities to defend the vast WUI.

What is the total length of Santee’s existing WUI and how has that changed since 2000?

What was Santee Fire Department’s total staffing and emergency response times in 2000 and how has that changed?

What will be the total length of the WUI for the project and Santee as a whole if approved?

6.1 Defensible Space/Fuel Modification Zones

“It has been reasoned by fire officials conducting after-fire assessments that **damage to the structures built to the latest codes is likely from unmaintained flammable landscape plantings or objects next to structures or open windows or doors** (Hunter 2008).” [2020 FPP p. 85]

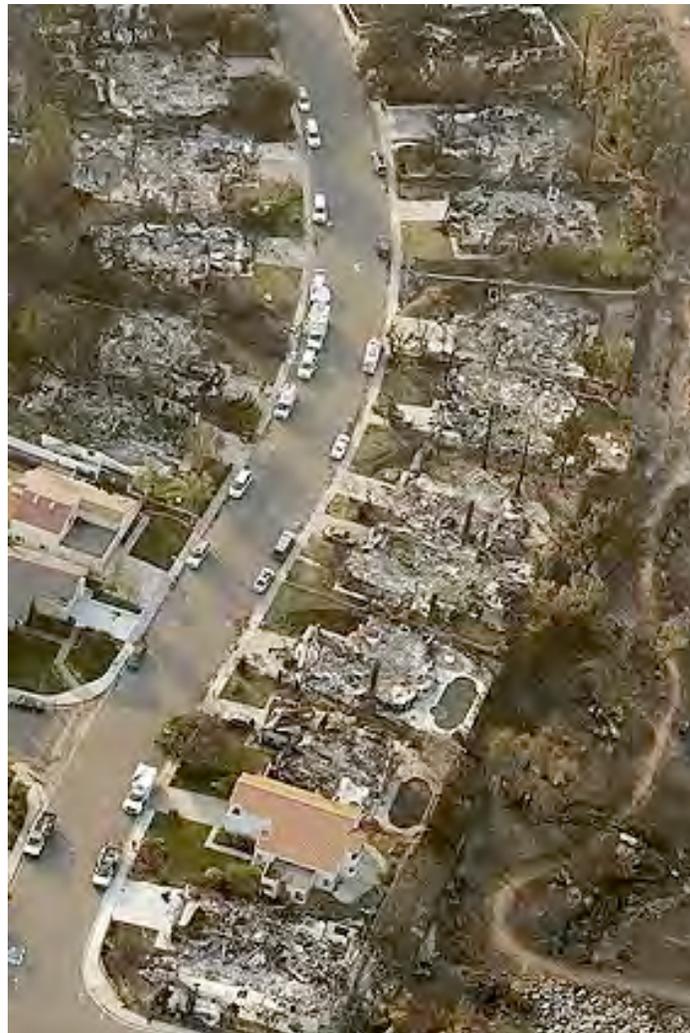
⁵ <https://elementalreports.com/kpcc/2018/12/10/new-houses-build-to-fire-code-burned-down-anyway-in-southern-californias-2017-thomas-fire/>

⁶ <https://www.sacbee.com/news/california/fires/article227665284.html>

“...there is no guarantee that **compliance** with these standards would prevent damage or **destruction of structures** by fire in all cases.” [2020 FPP p. 87]

“Further, it is well-established that firebreaks and fuel breaks placed in open space areas do little to slow a wind-driven wildfire (Syphard et.al. 2011, Keeley 2016) and create invasive species issues (Merriam et.al, 2006, 2007).” [2020 FPP p. 98]

The FPP does not even consider the potential for a cluster burn carried by adjacent high-density structures. Fire accelerates rapidly upslope. In other words, fire runs up where water runs down. It only takes one of these tightly packed structures above a fire chimney to ignite a chain reaction burn. Items such as lawn furniture, BBQs or a breakdown in housekeeping could be the trigger.



6.1.1.4 Zone 2 – Retain 30% of Vegetation (50 to 100 feet wide)

- * Zone 2 includes the following key components:
- * Zone 2 requires a minimum of **70% thinning or removal of plants**, focus on removing the most flammable species, and dead and dying plants while creating a mosaic of shrub groupings.
- * Zone 2 consists of low-growing, fire resistant shrubs and groundcovers with an average height less than 24 inches.
- * Grasses between shrub groupings would be cut to 4 inches in height.
- * Ground cover between shrub groupings to be maintained less than 6 inches high.
- * Trees and tree-form shrub species that naturally grow to heights that exceed 4 feet would be vertically pruned to prevent ladder fuels.
- * Maintenance including ongoing removal and thinning of dead/dying shrubs.
- * Plant species introduced or to remain in Zone 2 would not include prohibited or highly flammable species (Refer to Appendix F).

Where, for a large subdivision in chaparral fuel under the above prescription, has Zone 2 been maintained for a period of 10 years or more?

The prescription for Zone 2 represents a massive amount of work that is not feasible to perform over the long-term. Eventually it will be fudged and then ignored.

It subjects the landscape to significant adverse impacts from erosion and significant impacts to sensitive wildlife species.

The standard approach for Zone 2 (still difficult to implement over time) is to reduce total volume of biomass by 50% relative to the adjacent natural landscape.

“Zone 2: Area between 50 to 100 feet from the structure. Native vegetation may remain, but it must be thinned by 50% when the parcel is compared to the natural wildland setting adjacent to it.” [CAL FIRE / SD County Defensible Space compliance checklist. Reference San Diego County Ordinance 10147 / PRC 4291]

Furthermore, SDC Ordinance 10147 Section 68.406(a) requires plant root structures to remain in tact to prevent erosion and the height of weeds and annual grasses to not exceed 6 inches. (a) “leave the plant root structure in tact to stabilize the soil and prevent erosion...” (b) “Re-planting may be required for erosion control.”

The 50% thinning of fuel volume approach allows more fire resistant plants to naturally out compete easily ignited flash fuels that regularly invade disturbed soils as would occur under the new code.⁷

The City of Santee received testimony regarding the vulnerability that would be established by its new Zone 2 ordinance. However, the City chose to disregard the expert testimony and approve it without further research.⁸

⁷ Dudek uses the 50% prescription in an FPP for the “Lone Oak Road Project” 2015, p. 35.

⁸ Expert testimony provided by Van Collinworth to the Santee City Council, Item 7, November 13, 2019.] [Minutes 11/13/2019]

6.2.1 FMZ for Existing Communities

“The Fanita Ranch HOA will provide and maintain a 100-foot wide thinning zone where existing fuels are maintained in a low fuel state consistent with a Zone 2. Grasses will be mowed to six inches and shrubs thinned to maintain spacing and overall fuel loads at Zone 2 levels (See Section 6.1.1.4).” [p. 74]

The extensive existing WUI has not been maintained consistent with this standard.

Photographs off of Halberns Boulevard and Cuyamaca Street taken on May 14, 2020 demonstrate the difficulty of keeping the Fanita WUI in a state of compliance.



Fanita WUI @ Halberns Blvd. May 14, 2020



Fanita WUI @ Cuyamaca Street, May 14, 2020

6.2.3 Roadside Fuel Modification Zones

Individuals trapped by gridlock and forced to shelter in vehicles or escape on foot would be subjected to potentially fatal smoke inhalation and radiant heat. A distance of 4x flame length is needed to prevent injury (not accounting for potential convective activity).



For example, utilizing the FPP assumption of 66 feet flame length in chaparral adjacent roads would require 264 feet clearance radius and 528 feet clearance diameter. More extreme input variables require greater clearance. 100 feet flame lengths x 4 = 400 feet radius x 2 = 800 feet diameter.



8 Cumulative Impact Analysis

The FPP fails to disclose and consider the quantity and impact of an expanded WUI.

The FPP fails to discuss the impacts of accelerating climate breakdown upon potential fire behavior in the fire corridor where it proposes to place over 8,000 individuals with related structures.

9.2.2 Firefighter Response during Wildfire

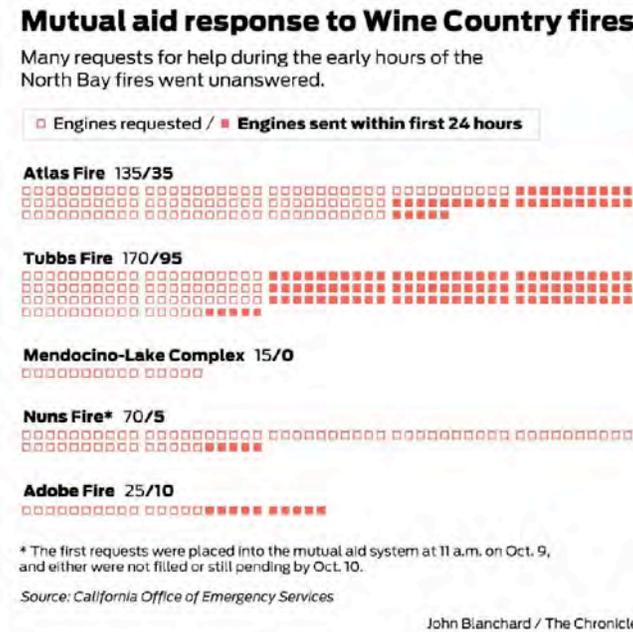
Without considering the growth of WUI in the city, region and state and the stress upon resources that is common during multiple wind driven events, the FPP makes a commitment for service availability that **cannot be assured**.

*“During a large, regional wildfire, the City assures response from its fire stations, including the on-site station. During a large wildfire, there would be several or more fire agencies providing resources including CAL FIRE with its full complement of ground and aerial attack capabilities. San Diego County includes a significant wildfire response resource with equally as significant experience pre-planning, coordinating, and attacking wildfires that would **all be available to the Project area, as needed.**” [FPP 2020 p. 99]*

This is another reversal from FPP 2007 [AR 018511, 12].

*“...there can be **no assurance** that any of these engine companies will be in their stations when multiple wildfires are occurring throughout southern California such as occurred during 2003 Cedar Fire event. On high/extreme fire danger days, there are often multiple starts and engine companies are often already deployed on other incidents.”*

In fact, some resources, even if not deployed elsewhere, become grounded due to high winds and extreme fire behavior. No firefighter signs up for or is knowingly sent on a suicide mission.



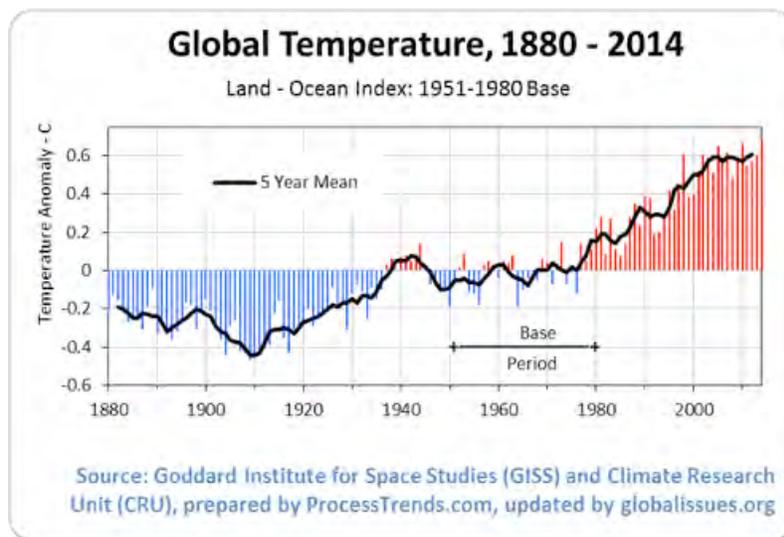
9.2.3 Fire Behavior Modeling and Fuel Modification Zones

The FPP makes several errant assertions in section 9.2.3:

“The 2007 FPP used a very aggressive fire behavior model known as a FM 4. This model is known to dramatically overestimate fire behavior and is not applicable to most of the fuels found on the site (Weise and Reggelbrugge 1997).

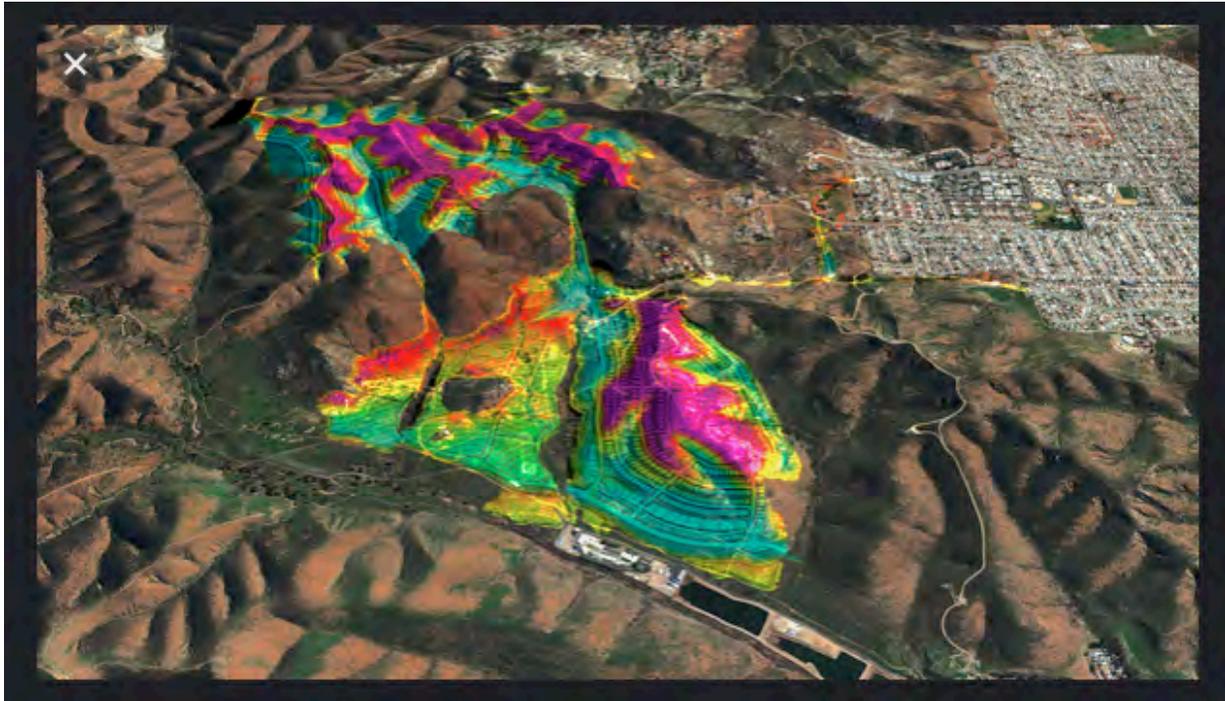
The 2007 FPP modeling calculated worst-case fire condition flame lengths of 95 Feet in the site’s heaviest fuels. The 2020 FPP utilizes FM 4 in specific areas where that type of fuel would occur at a climax condition when allowed to accumulate. The updated modeling resulted in worst-case flame lengths of approximately 66 feet in the site’s heaviest fuels during extreme fire weather. Differences in the modeling outcomes are related to wind speeds used in the modeling effort (the fuel moisture values used in both FPPs are the same). The 2007 FPP utilized 60 mph 20-foot wind speeds. The source of the wind speed data used in the 2007 FPP is not cited and is therefore unknown. The 2020 FPP utilized wind speed values established by San Diego County. These County standards identify appropriate wind speed inputs that are based on maximum-recorded wind speeds and an analysis of 99th percentile wind speeds from local remote automated weather stations (RAWS). The Peak wind values identified in the County standards (and used in the 2020 FPP) are the highest wind speeds recorded by a RAWS during the 2003 Cedar Fire.” [p. 99]

1. The 2007 FPP appropriately used FM4 for the chaparral in the northeast portion of the site and utilized other fuel models for other portions of Fanita. **The 95 foot flame length estimated is reasonable** and under estimates the intensity in more severe low humidity and high wind conditions. [AR 018490 “...flame length usually exceeding 100 feet.”]
2. The Cedar Fire does not represent the highest potential wind speeds. Higher wind speeds can and have been generated even if those wind speeds did not result in a major regional fire.
3. The Camp Elliot RAWS data cited by the FPP is halfway between the project site and the Pacific Ocean, at a different elevation and with a different geographic formation. These are significant differences when considering potential wind speeds, humidity, etc.
4. The FPP makes the false assumption that climatic conditions are constant. It ignores documented trends for greater extremes in weather and fire behavior.



9.2.4 Susceptible Project Design

An aerial of the 2020 project design reveals structures located above numerous fire chimneys required to evacuate over roads subject to flame lengths exceeding 100 feet.



“The 2007 FPP was based on a land plan that included peninsulas of development surrounding by wildland fuels. This situation leads to a higher risk of fire encroachment than if there is one managed exposure and where developed areas are wider with more space between native fuel areas.

The 2020 FPP is based on a land plan that excludes narrow islands and peninsulas of development and includes contiguous developed areas that form fuel breaks by converting wildland fuels to managed landscapes and ignition resistant structures.” [p. 99]

It is agreed that the 2007 land plan was a susceptible project design. However, the 2020 plan still places susceptible development above FM4 fire chimneys on the north and eastern exposed interfaces. This significant impact to public and firefighter safety should be avoided by removing the northeast island of development.

9.2.5 Evacuation Plan

More than half of the “Vineyard Village” home sites of the northeast island require evacuation in the direction of Santa Ana winds that may carry thick smoke and embers ahead of the fire front. Late evacuation could result in panic with injuries due to atmospheric conditions alone.



Appendix B-3 FlamMap Fire Behavior Post Development, Fall Fire Flame Lengths documents flames of at least 40-50 feet on the north and 60+ on the south of the two access routes to/from the northeast development island. Radiant heat impacting these routes could be lethal if utilized during fire activity.

The Evacuation Plan is generic and overly simplified. Specific issues follow.

Wildland Fire Evacuation Plan for Fanita Ranch Community

The analysis does not attempt to consider the impact of varying ignition points upon evacuation routes and surges in traffic volumes. Nor does it consider the impacts of limited visibility due to smoke, embers and darkness.





Traffic studies have not considered the need for existing homes to evacuate on the same circulation network required by the project.

Substantial traffic volumes from both the project and existing development have been ignored in regard to evacuation requirements.

Affected populations tend not to respond to evacuation warnings until late in the evacuation period, leading to likely gridlock from weaker portions of the circulation network during late surges in evacuation response.

The feasibility of evacuating at either AM or PM peak commute hours has not been considered.

Time and logistics to evacuate special needs residents has not been considered.

The impact of attempting to evacuate with recreational vehicle trailers and motor homes has not been considered.

The emotional state of drivers has not been considered.

Road capacity can be diminished by any or all of these factors to restrict circulation.

What contingencies are there, if any, should evacuating drivers abandon gridlocked vehicles and attempt to flee on foot?

The analysis fails to consider any evacuation scenarios for the project based upon footprint, ignition points, and topographical vulnerabilities for full or partial evacuations to any or all safety zone capacities/locations required.

1.2 Register to Receive Emergency Alerts

The Reverse 911 AlertSanDiego system is an important communication tool. A weakness is the potential for late notice or the public reliance upon an official alert that may not arrive. Individuals have perished in California’s mega-fires that waited for official notice rather than understanding and acting upon their own situational awareness. The proximity of SR-67 east of the site and the potential for ignitions from SR-67 during Santa Ana winds has the potential to make Reverse 911 ineffective.

3.2 The Evacuation Coordination Process

Considering the potential for total gridlock of ingress/egress, who will be providing transportation assistance for those who need it and how will they be identified?

As stated, at 3.3 “...wildfires igniting nearby, may occur with little or no notice and certain evacuation response operations will not be feasible...Evacuation assistance of specific segments of the population may also not be feasible.”

3.3.1 Evacuation Points and Shelters

This section is too generic. It fails to identify and map specific sites that meet the general criteria and consider under what fire scenarios with time-of-day traffic expectations these safety zones may or may not be feasible “points and shelters.” What safety zones work and what evacuation scenarios do not work under severe fire weather conditions from various ignition points?

Where are the closest animal shelters and who operates them?

What animals would they accept or deny?

What capacity is available for emergency temporary shelter?

3.3.2 Shelter in Place

Shelter in Place may be utilized in the “situation where that alternative is determined to be safer than evacuating.”
[*Tubbs Fire devastation 2017, Santa Rosa, CA*]





The fortified examples pictured demonstrate this “situation” may not be safe at all, but individuals may be left without any other choice. Will gridlock on Mast Boulevard and the 2 connections to the project site ensure that Shelter-in-Place is actually the only survival strategy executed?

What areas of the project site are more and least susceptible to cluster burns? Once identified, how will that susceptibility variation impact Reverse 911 or other evacuation notice and phasing?



4 Fanita Ranch Evacuation Road Network

“...most human fatalities from wildfires are due to late evacuations when evacuees are overtaken on roads...” (p. 19)

It should be noted the routes required to access and exit the site (Cuyamaca Street and Fanita Parkway) create a “U” configuration that relies upon Mast Boulevard to function. Mast Boulevard fails now during commuter hours, especially during the school year. What strategy addresses these facts?

Mast Boulevard should be studied under worst-case scenario fires to determine if completion to Lakeside for connection to SR-67 would mitigate risk or heighten it due to induced traffic from Lakeside avoiding SR-52 congestion. Mitigation should be required when its effectiveness is confirmed by a study.

“Road infrastructure throughout the United States, and including San Diego County is not designed to accommodate a short-notice, mass evacuation (FEMA 2008). The need for evacuation plans, pre-planning, and tiered or targeted and staggered evacuations becomes very important for improving evacuation effectiveness.” (p. 19)

Considering the facts stated above, why has the project massively increased the population allowed over the constraints of Santee’s existing General Plan?

Why are the most vulnerable portions of the site selected for habitation with high-density housing with greater cluster burn potential homes than the housing prescribed in the Santee General Plan with lower risk of cluster burns? Damage assessment research has documented homes with separation of ≥ 45 feet are less vulnerable to cluster burns. [IBSH, Megafires: The Case for Mitigation]



What is the population density of perimeter homes discussed relative to the capacity of the “internal areas” of the Fanita Commons Village Center identified as a shelter when evacuation is not feasible before the fire front arrival?

How long would it take to evacuate perimeter homes to the Commons Village Center?

How much available parking space is there and how does that relate to the number of perimeter and other homes targeted for potential evacuation?

What is the procedure for school evacuation and to where?

Will school be cancelled on red flag days?

What is the impact of and procedure for Public Safety Power Shutoffs (PSPS) affecting the site and traffic signals?

Will there be micro-grids with on site energy storage?

Under what fire scenario is the Village Center at risk [**large shopping areas protected by freeways still burned** in Santa Rosa, 2017 Tubbs Fire].



What is the estimated time required to evacuate the entire Fajita Ranch project with 8,000 plus residents? How does that change based upon time of day, commutes and school sessions?

How will the school be evacuated? How will the potential panic during ingress and egress be dealt with when parents try to reach the school to get their children?

How would a need to evacuate the Fanita Ranch project site impact the ability to evacuate the existing wildland urban interface adjacent to the project under moderate to severe fire weather conditions?

The project would subject current levels of congestion to another 25,000+ vehicle trips/day. In an emergency evacuation scenario, the gridlock created can be life threatening.

The DREIR has not only, not fully disclosed this impact in the context of wildfire emergency evacuation, but has reached an errant conclusion that the project “would not result in inadequate emergency access.” [4.16-111] What is this statement based upon?

What are the fuel conditions and potential flame lengths for street segments and intersections required for evacuation?

While additional access would be created, the DREIR should consider how that access with an additional 25,000+ vehicle trips per day would disrupt circulation for emergency purposes.

“Current levels of congestion in the AM and PM peak periods affect the reliability of service on this freeway and delay travel times. Heavy congestion on SR-52 has a ripple effect on surrounding roadways, degrading conditions and increasing overall congestion in the region. Future traffic projections indicate that these conditions will worsen unless improvements are implemented on SR-52.”
[DREIR 4.16-98]

The DREIR considers 66 intersections, 64 street segments and 7 freeway segments.

Conclusions include significant adverse impacts to 12 intersections, 6 street segments and 2 freeway segments. Cumulative impacts increased the numbers to 15 intersections, 8 street segments, while 2 freeway segments remained significantly impacted.

Even with 30 prescribed mitigation measures, many “impacts to these [6] intersections, [5] street segments, and [2] freeway mainline segments **would remain significant and unavoidable.**” [DREIR 4.16-100]

Santee’s heavily impacted circulation network will be significantly more vulnerable during wildfire emergency evacuation. This significant adverse impact must be considered and disclosed.

In the time since the Appeals Court confirmed the Superior Court decisions on fire safety impacts in 2012, California has repeatedly broken records for the largest, most deadly and most damaging wildfires. These subsequent events serve to confirm the court decisions in real time.

6 Fanita Ranch Evacuation Procedures

The plan fails to consider any evacuation scenario specific to Fanita topography, project design arrangement and its dependent circulation system. The section is completely inadequate. The Wolshon and Marchive paper referenced is not specific to Fanita. A generic prescription for more lead-time with traffic control to prevent simultaneous exits is too general to determine if these goals could be implemented in any specific emergency. The threat is too great to omit a specific study.

What defines the “orderly, pre-planned evacuation process” envisioned?

What constitutes a trigger on a “conservative threshold?”

How great a “time allowance” is required and in what situations, including worst-case scenarios?

How many officers are needed for traffic control and where? Where are the safety zones and escape routes for these officers for worst-case scenarios?

What is the contingency when no traffic control officers are available or the threat precludes their deployment? Or when cluster burns force simultaneous evacuation?

“Fanita Ranch is not considered a vulnerable community.” This assumption is reckless, irresponsible and without substantial evidence. It ignores the record of growing California fire destruction since 2007. The built in assumption of invulnerability undermines the entire plan.

6.1 Fanita Ranch Evacuation Baseline

How will the Evacuation Plan or project achieve the compliance “of all residents and guests within the boundaries of the Fanita Ranch Community...to adhere to the principals and practices of the “READY! SET! GO!” Program”?

Since “it is imperative that each household develop a plan that is clearly understood by all family members,” will such a plan be mandatory for completion prior to occupancy? Who will be responsible for proper completion of the plan and making sure that it is understood? Will there be a pass/fail test administered? What are the potential consequences of confusion?

Since “it is imperative that the “READY! SET! GO!” information be reviewed on a routine basis along with accompanying maps illustrating evacuation routes, temporary evacuation points and pre-identified safety zones, who will be responsible for the review’s completion?

Will there be monthly, quarterly or annual project evacuation drills?

Who will be responsible for preparing “accompanying maps illustrating evacuation routes, temporary evacuation points and pre-identified safety zones”?

Shouldn’t this evacuation plan consist of accurate and timely updated “accompanying maps illustrating evacuation routes, temporary evacuation points and pre-identified safety zones? If so, where are they?

The evacuation plan map on the cover of the plan that is repeated on the interior [Figure 2] is too general and speculative regarding the connections to be the sole evacuation map. Specific maps with corrected accurate connections consistent with build-out of the development phases and roads should be provided, including a specific accurate map immediately.

The generic Figure 2 map included in the Evacuation Plan is based upon presently inaccurate and speculative connections. Evacuation plan maps should be clarified based upon when connections will occur and consider how the phased population increases will interact with existing populations under different worst-case scenarios. The Figure 1 Vicinity Map is also too vague.

6.2.1 Safety Zones

“The definition for a safety zone includes provisions for separation distance between the firefighter and the flames of at least four times the maximum continuous flame height.”

This rule of thumb cited at p. 28 does **NOT** account for convective activity (such as fire whirls and fire tornadoes) that could impact the site selected for a safety zone.⁹ [AR II:10129036-37]

The assumption that interior neighborhood roads could be utilized as safety zones assumes the area would not be subjected to convective activity and that the wildland fire does not transition into an urban fire with high-intensity cluster burns. One weak link, such as a home with an open or broken window could compromise interior neighborhood roads.

The assumption that a 66-foot tall flame length is a worst-case scenario that can be used to calculate safety zone requirements is not correct. The northeast portion of the site contains chaparral vegetation that can exceed flame lengths of 100-feet under extreme weather conditions and increasing maturity. [2007 FPP @ AR II:6:28596, II:6:28606, II:6:28607, AR 018490 “...flame length usually exceeding 100 feet.”]

The northeast portion of the site - “Fanita Mountain” also contains numerous chutes / fire chimneys oriented with Santa Ana wind driven fires and proposed development.

Thus, the conclusion (p. 29) “...identified safety zones may not be feasible due to distance, location, fire behavior, etc.” is correct.

6.2.2 Temporary Firefighter Refuge Areas

The discussion of TRAs attempts to psychologically leverage developed portions of the site into protection for firefighters and residents. Reliance upon TRAs would subject individuals to higher risk of failure, injury and death. A TRA is something that can provide some temporary shielding from radiant or convective heat. TRAs may or may not be effective as fire intensity grows, fire behavior changes and time available for shielding varies.

While firefighters may use TRAs to leverage aggressive tactics while experiencing the emotional pressure to rescue life or property, TRAs are not suitable for residents with any other feasible alternative. TRAs are required when there is no other option and must be utilized because of a deteriorating situation that precludes the ability to travel on a predetermined escape route to a safety zone.

⁹ The Car Fire tornado reached wind speeds of 165 mph, temperatures of 2,700° F. In 40-minutes it had a mile long path of destruction. <https://www.youtube.com/watch?v=YvfDbODi-vQ> And <https://www.wired.com/video/watch/extreme-events-fire-tornado>

“Important: Do not use a structure or apparatus TRA as a substitute for identifying and utilizing viable escape routes and safety zones. Only use a structure or apparatus TRA if escape routes to safety zones have been compromised.”

...During wildland/urban interface (WUI) fires, it’s become an all-too-common occurrence for firefighters to take greater risks when defending civilians and assets. Although no fire agency suggests taking extraordinary risks, firefighters have a natural tendency to push the envelope when lives and structures are threatened...

In short... a TRA is not a replacement for an identified safety zone; it is merely a temporary, short-term solution that firefighters can use when needed.”

***Fire Rescue, Issue 9, Volume 7, 7/17/12
Jerry Burke and Kelley Gouette***

7 Limitations

“During extreme weather conditions, there are no guarantees that a given structure will not burn or that evacuations will be successful...” (p. 36)

Again, so why place residents on the riskiest portions of the site at higher densities than the General Plan allows?

Appendix B Fire Behavior Analysis

[B-7] Table 3 BehavePlus Fine Dead Fuel Moisture Calculation

“Dry Bulb Temperatures 90-109 deg F” underestimate peak temperatures for the site that approach 120°F.

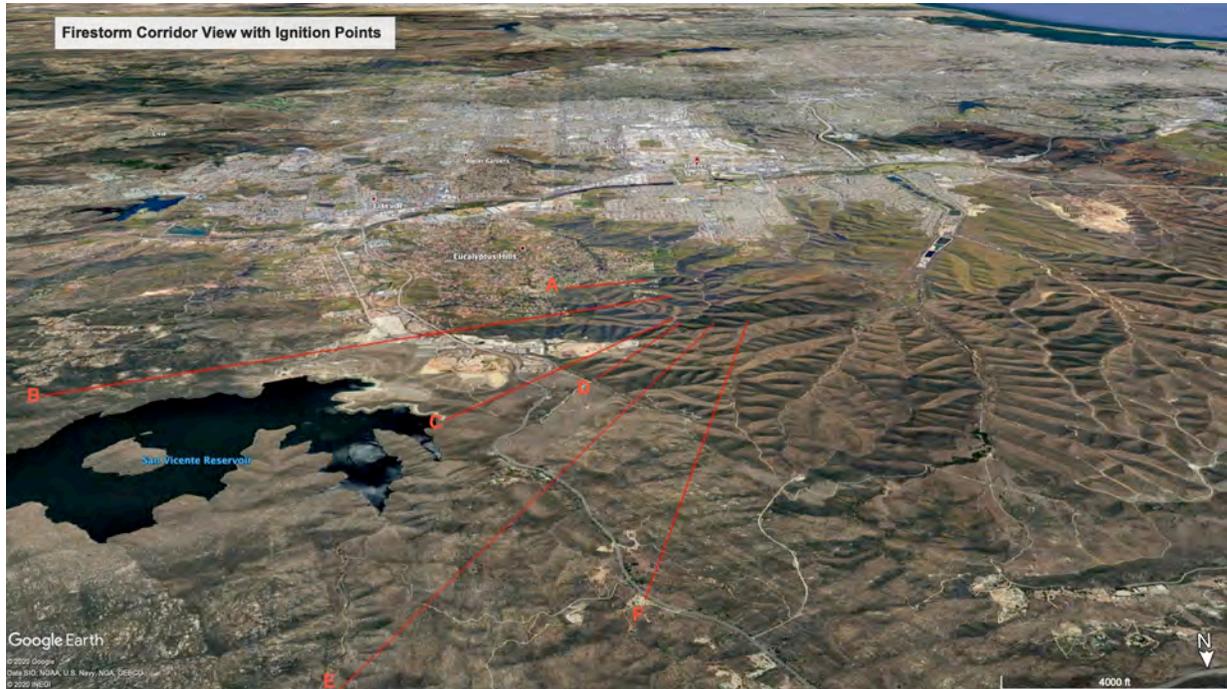
[B-7] Table 4 Weather Variables From County of San Diego Standards

“20-foot Wind Speed 19 mph ... 41 mph” underestimates peak winds for the site.

At **[B-6-8]** the Fire Behavior Analysis discusses the Camp Elliot RAWs weather data relative to County of San Diego standard weather guidelines. By making this comparison, the analysis errantly suggests that using the County Standards in the modeling presents a conservative analysis. The suggestion is false. Camp Elliot is about halfway between Fanita and the Pacific Ocean with significant geographic differences. The mountainous portion of Fanita is over 600-feet higher in elevation while the Sycamore Canyon is over 1 00-feet lower in elevation. Camp Elliott is a mesa subject to higher maritime influence while Fanita has diverse topography subject to higher inland temperatures and wind patterns. Furthermore, the County standard guidelines underestimate potential weather extremes at the Fanita site. As the earth’s energy balance is increasingly disrupted by anthropologic GHG emissions, further weather extremes that would intensify fire behavior can be expected.

The DREIR has errantly concluded that Wildfire impacts are not significant.

What are the rate of spread calculation results for the BehavePlus4 fire runs created in FPP 2020? What are the differences in these results compared to FPP 2007 rate of spread calculations for worst-case fall and summer fire runs?



Please answer the following questions for ignition points A-F for a wind-driven fire pushed to a top speed of “17 mph.”

Also, please answer the following questions for ignition points A-F for a wind-driven fire pushed to a top speed of “1,966.5 feet/minute [AR II:6:28670] consistent with utilizing FPP 2007 inputs to the BehavePlus fire behavior model.

How long would it take for the fire to travel to the project site assuming failed or no initial attack with the winds aligned directly from the ignition points to the project site?

For a 4:00 AM ignition:

- What are the ranges of time expectations for the fire to be reported?
- What are the ranges of time expectations for the emergency operations center to evaluate the report and dispatch response units?
- What are the ranges of time expectations for response units to the ignition points or associated vantage points to provide a fire size up?
- Upon receiving a fire size-up, what are the range of time expectations for Emergency Operations to determine the developed areas at risk?
- Once a threatened area has been identified for evacuation, what are the ranges of time expectations for activating the Alert San Diego reverse 911 system.
- What back-up alert system exists in cases of reverse 911 system failures?
- What are the ranges of time expectations for evacuating the entire project site?
- What are the ranges of time expectations for evacuating the northeast “Vineyard Village?”

- What are the ranges of time expectations for evacuating the northwest “Orchard Village?”
- What are the ranges of time expectations for evacuating the established WUI from Cuyamaca Street to West Hills Parkway north of Mast Boulevard?
- What are the range of time expectations for evacuating the northeast Vineyard Village, Orchard Village and the established WUI from Cuyamaca Street to West Hills Parkway north of Mast Boulevard?
- Where are the safety zones for evacuations of threatened structures and what are the escape routes available to reach any safety zone identified?
- What are the dimensions and capacities of any safety zone identified?
- The FPP suggests the use of Temporary Refuge Areas. Where are the TRAs and what are the characteristics of any TRA identified? What are the limitations of any TRA identified/suggested and how much radiant heat would make the suggested TRA inadequate?

Please answer the same series of questions above for ignitions during AM commuter hours.

Please answer the same series of questions above for ignitions during PM commuter hours.

Please answer the same series of questions above for ignitions during daylight off commuter hours.

Please answer the same series of questions above for ignitions during nighttime off commuter hours.

Please answer the same questions above for a fire originating 17 miles to the northeast of project structures?

Under all of the fire scenarios listed above, how will the public make a decision on whether to shelter or evacuate.

What are the trigger points that the public will use to determine whether to shelter or evacuate?

For each evacuation route, what are the adjacent fuel types?

For each evacuation route and fuel type identified, what are the flame heights projected using BehavePlus calculation with worst-case fire behavior input variables?

For each evacuation route, what is the distance from the road to the end of the FMZ? Or what is the distance from the natural fuels to the road for each side of the road?

What is the result if an individual by vehicle or foot is burned over while traveling on the routes identified?

What is the result if an occupied vehicle is burned over while gridlocked on the routes identified?

Retired Cleveland National Forest Supervisor Dr. Anne Fege states at [AR II:149:29379]:

“Since evacuation is apparently City policy, road configuration changes within the subdivision can clearly increase fire safety. Emergency evacuation of the project “in a reasonable amount of time using safe routes” is undefined. Rock Point [Now identified as Vineyard Village] is vulnerable to ignitions at the SR-67 corridor within 10 minutes or less under high velocity Santa Ana winds. Evacuation routes are vulnerable to direct flame impingement, radiant heat and smoke. City reference to “safe routes” for evacuation is unsupported and incorrect.”

Considering the answers to the series of questions above for the same ignition points, from the city's perspective, what in the present project has changed from Dr. Fege's conclusions in regard to similar development of the "Rock Point"/"Vineyard Village" portion of the project?

With a worst-case Santa Ana wind aligned, for an ignition in the San Diego River watershed approximately 22 miles northeast of the project, please answer the same series of fire safety questions above.



For a fire with an onshore flow worst-case scenario wind, please answer the same series of questions above.

The DREIR fails to present substantial evidence to support its conclusion that wildfire impacts are insignificant. In fact, data is presented within the DREIR that contradicts a conclusion of insignificant impacts. The stubborn determination to embed housing in rugged fire explosive topography defies reason.

Without making a clear finding, the apparent inability to evacuate the project site rapidly puts the burden upon residents to shelter in place regardless of the voracity of the impending firestorm. California's record-breaking megafires have demonstrated this approach results in loss of life and property. These devastating fires have also resulted in a new awareness of harsh realities from fire professionals and planners.

Pete Parkinson, AICP and California president of the American Planning Association has spoken out strongly about the failure of the exact approach the Fanita Project relies upon. Parkinson's conclusions are attached and should be recognized by all those involved in project design and decision-making. [Northern News October 2018]

Key points:

Of 5,600+ homes destroyed during the Tubbs Fire, 3,000 were lost within the city limits. 1,300 were NOT considered to be in a wildfire hazard zone.

Chapter 7A building code and shelter in place strategies do not offset the risks of placing residents in harms way.

“...Relying on a hardened structure to protect whole communities in a known fire-prone area is the height of hubris and callousness. In Santa Rosa’s Fountaingrove neighborhood, homes that were built to WUI standards appeared to fare no better than those built before those standards...Sheltering in place is a last resort, not a “plan.”

...we cannot engineer our way out of every hazard...

Increasing density in rural, fire prone areas increases the likelihood of a catastrophic fire...The fire hazards in some areas of our state are simply too great to allow additional residential development...As planners and as local government decision makers we thought we had anticipated the hazards and planned accordingly. We were wrong...we trained and exercised for scenarios we thought were “worst-case.” We were wrong about that too.”

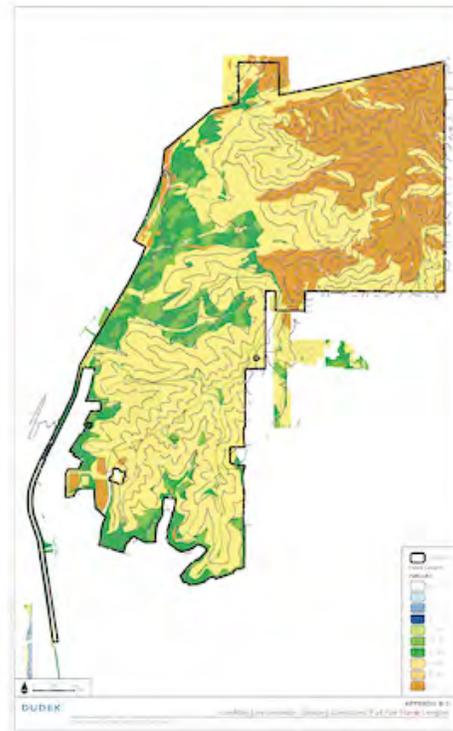
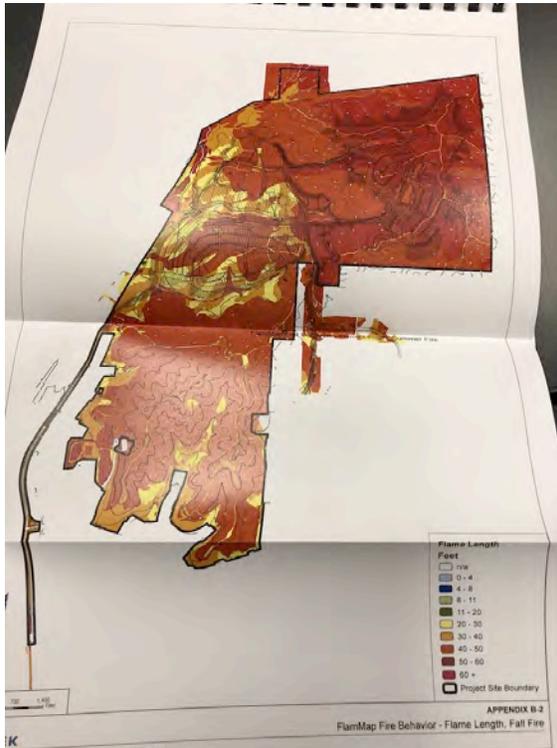
The DREIR has failed to disclose or understand the significant hazards to life and property created by the project as proposed, including to the established WUI.



An aerial view of homes that were destroyed by the Tubbs Fire on October 11, 2017 in Santa Rosa, California. (Photo: Justin Sullivan/Getty Images)

Appendix B-2 FlamMap Fire Behavior – Flame Length, Fall Fire

Compare Administrative Draft Appendix B-2 to Appendix B-2.



Why has the housing overlay and all red flame color been removed from the map and legend of Appendix B-2?

The color palette selected and the removal of the housing overlay appears to be an attempt to veil the significant hazards. The flame lengths have also been reduced versus FPP 2007. What would these maps look like without diminishing 2007 input variables and the color contents?

4.1 Aesthetics

The Fanita range of hills and mountains in northern Santee set the scenic backdrop for the entire city and adjacent jurisdictions. The views are invaluable. Lenses and photo simulations chosen veil the significant unavoidable impacts of the project by the demolition of the Fanita mountaintop to construct "Vineyard Village."

The DREIR should revisit these impacts and disclose them.

Section 4.2: Air Quality

The project would have significant and unavoidable air quality impacts and should be denied. [4.2-21, 25]

Santee residents are already subjected to heavy concentrations of wind blown dust from operations of the massive Sycamore Landfill. New sources of dust are a significant health hazard.

What surveys have been done to test for Valley Fever in soils targeted for grading? How would a positive identification for Valley Fever be addressed?

4.3 Biological Resources

Fanita is a state park quality resource in both scenery, wildlife and resources. The land is highly constrained by rugged topography, by its geographic isolation and limited circulation access. The natural urban growth boundary created by the steep slopes leaves the interior walled from the noise and visual impacts of urban development and highways to the south. Fanita allows endangered wildlife to thrive and those that venture onto the historic Stowe Trail the opportunity to experience nature in a setting that turns back time to remind us of the grandeur in the natural San Diego now lost.

We carry forward our objections to the destructive adverse impacts to Fanita species. Our comments appear in the record at [AR 008221-008224, 088227-008231, 015208, 019898-020121, 020122-020132, 027873-027907, 027908-027937, 029026-029242, 029355-029377], [G8 46 12=10-2018, G8 55 12-15-2018]

Wildlife surveys are dated. The Hermes coppery butterfly is now listed as endangered and the USFWS designated critical habitat on Fanita. This is significant new information. How does the project footprint / housing arrangement intersect in critical habitat acreage impacts? New wildlife surveys should be performed and the DREIR recirculated.

How is the project being processed and why? What permits are required?

Will the project seek a Federal 10A Permit?

Will the project seek a Section 7 Permit?

Will the project be consistent with a **FINAL** MSCP subarea plan?

When will the subarea plan become final and why is the project requesting approval prior to the subarea plan?

Please disclose the comments of the Wildlife Agencies on the Santee draft MSCP subarea plan.

Please disclose all Wildlife Agency letters and comments on the current project application.

What is the status of the Wildlife Agency review of the draft MSCP Subarea Plan and Implementing Agreement? Please provide current drafts of both the Implementing Agreement and the Subarea Plan.

What is the status of the Wildlife Agency review of the current project in the context of any permits required?

Why isn't the 2018 Subarea Plan Administrative Draft provided for review? Fanita is the foundation. Please provide it and explain the unresolved issues relative to the project. The City now has a long record of revising drafts for developers' private negotiations with the Wildlife Agencies/City and withholding "Administrative Drafts" from the public [AR II:147:29351, II:238:35867-35893].

Where is the 210-acres of occupied California Gnatcatcher Habitat west of I-15 to be acquired that is needed to mitigate for CAGN impacts on Fanita, as previously requested by Wildlife Agency letter?¹⁰

Santee's 2003 General Plan update promised completion of the Subarea Plan simultaneous with the approval of the Sky Ranch project that swallowed up and exceeded all of Santee's 5% interim take allowance of coastal sage scrub habitat under the 4(d) rule while the plan was being "processed." Therefore, small landowners have not been able to utilize the 4(d) interim allowance. The City's attempt to process another large landholding without completing the Subarea Plan constitutes bad faith to small landholders, to the public, to the environment and it is illegal. This issue alone requires additional analysis and recirculation of the DREIR.

Approval of the Fanita Ranch project prior to final approval of a MSCP Subarea Plan and Implementing Agreement violates the nearly two-decade old Santee General Plan, which states at 9.4:

"The City has prepared a draft Multiple Species Conservation Program Subarea Plan that will, through an Implementation Agreement with the Resource Agencies, grant "take" authority to the City of Santee. This will streamline the environmental review process."

In introductory portions of the DREIR, including biological Appendix T, etc., half-truth propaganda is presented as facts to give the reader a false impression that the current unit count requested by the applicant is reasonable. Information that does not exist in the Administrative Record, specifically, an ancient County of San Diego General Plan prior to the incorporation of the City of Santee is used to suggest Fanita was designated for "approximately 14,000 – units." The section/s go on to mention the limit in Santee's initial General Plan, but fail to discuss that every time the Santee City Council took action to amend the Fanita guidelines the city council reduced the maximum allowable units.

If the DREIR cannot present the actual San Diego County General Plan that includes the language evidence to support the unit claim and supplement that information with the other actions taken by the

¹⁰ USFWS/CADFG, O'Rourke & Hunting, AR 1:193:018795. Wynn & Tippetts, 019278-9. Bartel & Raysbrook, 019288-9, Gilbert & Tippetts 019278-9. AR 029351, 35946-3549, 35971, 35943-45, 35496-35806, 35867-35893.

city council to amend the Fanita Ranch Essential Elements and Guidelines that further restricted densities, then the propaganda should be stricken from all documents and appendices throughout.

Facts: November 12, 1986. Santee General Plan Fanita Ranch Essential Element No. 3 “The total number of units shall not exceed 5,500 units...” [AR 001287] The amendment adopted replaced language in Santee’s first General Plan that restricted Fanita Ranch development not to “exceed 8,100 units.” [AR 001336].

The city would go on to reduce the maximum units to 3,500. The city council would act again in 1996 placing lot size limits that combined with other restrictions to put the maximum units to about 1,227.

Expansion of Fanita Parkway adjacent to Santee Lakes will result in a significant road kill impact (already a problem) to mammals, birds and reptiles, especially during night and off commute hours when speeds and volumes will be higher. The DREIR has not disclosed or mitigated for this significant impact. How will the project avoid or mitigate road kill adjacent to Santee Lakes of Fanita Parkway?

4.4 Cultural and Tribal Resources

Native Americans inhabited Fanita. It appears that grinding stones and other artifacts will be directly impacted by the development. Fanita has an ancient village site or sites and there are likely burial sites that may be disturbed by the project.

While we understand the need to protect specific locations from disclosure, the DREIR and appendices are devoid of any meaningful information to determine impacts, potential for avoidance and mitigation.

At minimum, the specific resources impacted and avoided should be disclosed without specific locations so the interested public and decision makers might make a determination about the significance of the impacts. What are the specific archeological resource impacts?

The DREIR states at [4.4-37] “consultation has not concluded.” What is the current status of the Tribal consultations as required by AB 52?

Considering that consultation with Tribal Councils have not concluded, why has the DREIR been released for public comment in a rush for project approval?

We request that the comment period be extended to coincide with the conclusion of consultation and the recirculation of the results. This is especially important considering that the public does not get access to review and consider the significance of the resources to be impacted by the project.

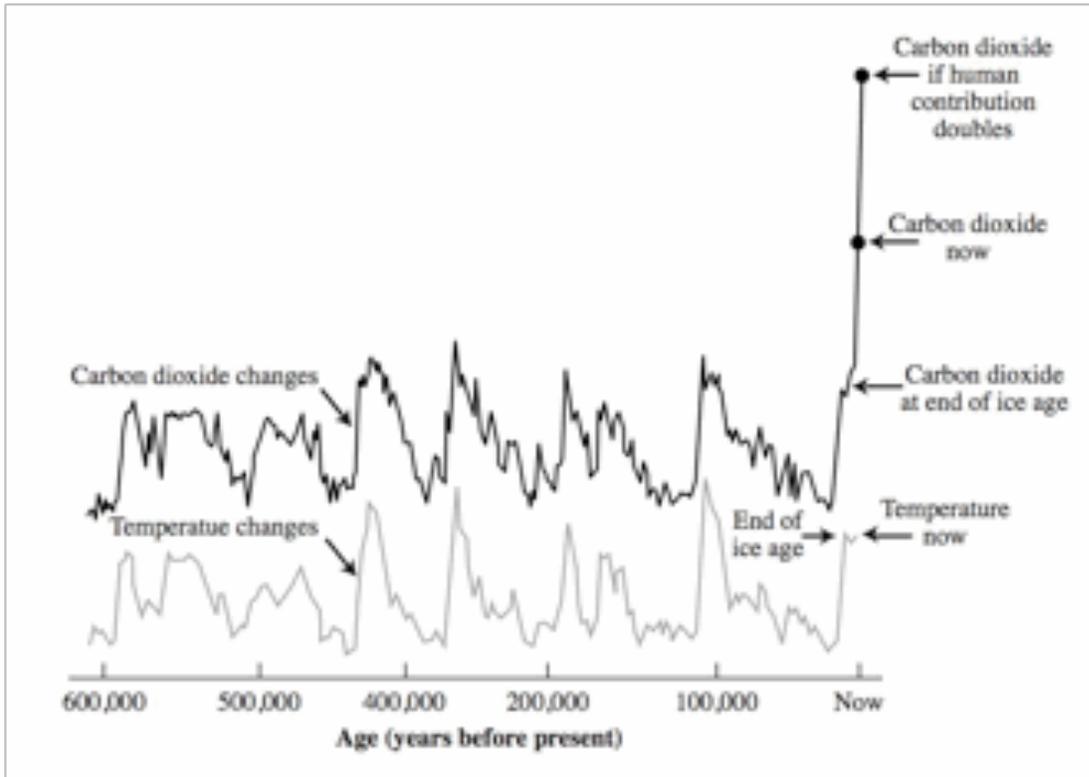
The lack of disclosure precludes the public’s ability to determine if the resource impact decisions are in compliance with state and federal laws.

4.5 Energy

The DREIR fails to disclose and discuss the implication of Executive Order B-55-18 directing carbon neutrality to be achieved in California as soon as possible. Considering the DREIR chose to include a discussion of the Sustainable Santee Plan adopted almost 2 years later, the omission is a glaring flaw in the DREIR and must be remedied.

Section 4.7 Greenhouse Gas Emissions

All GHG Emissions are now significant due to accelerating climate breakdown. Note how temperature follows CO2 concentrations in the atmosphere and reference the introduction to the “Sustainable Santee Plan” - climate action plan below.



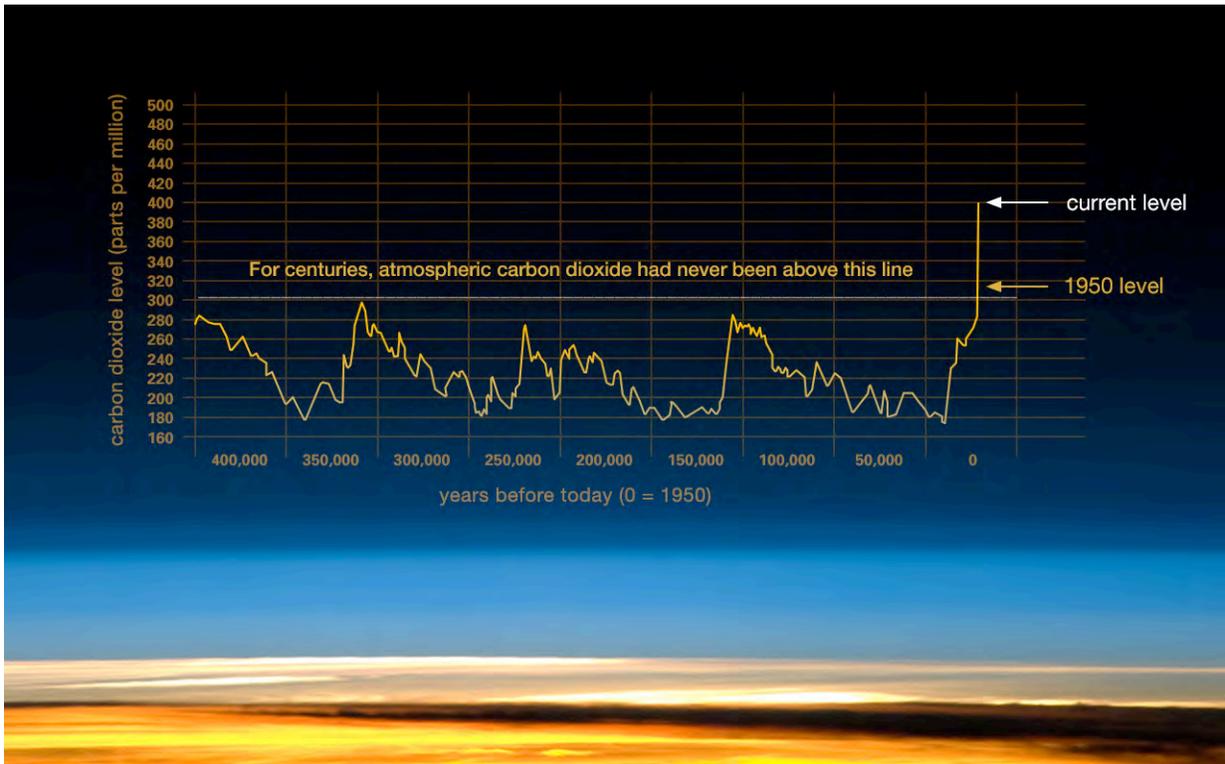
“Climate Change Devastation and Urgency To Act

California Executive Order B-55-18 (September 12, 2018) finds that climate change is causing historic drought, devastating wildfires, torrential storms, extreme heat, the death of millions of trees, billions of dollars in property damage, and threats to human health and food supplies. EO B-55-18 sets a target to achieve carbon neutrality statewide as soon as possible and no later than 2045 while maintaining net negative emissions thereafter. Scientists agree that that worldwide carbon must start trending downward by 2020, and carbon neutrality-the point at which the removal of carbon pollution from the atmosphere meets or exceeds emissions-must be achieved by midcentury at the latest. To have a 50% chance of limiting global temperature rise to 1.5°C, we must meet carbon neutrality globally by 2050, and to have a 67% chance, the target year is 2040. Significant devastating impacts will continue if warming is limited to 1.5°C, however, the benefits of limiting warming to 1.5°C, compared with 2°C, are enormous and incalculable.

To achieve carbon neutrality, massive reductions in carbon pollution and removal of carbon dioxide from the atmosphere will be required. As of October 2018, the remaining global carbon budget to have a 67% chance of limiting warming to 1.5°C was 420 Gt CO₂, and to have a 50% chance, the budget was 580 Gt. In 2018, global emissions reached approximately 40.8 Gt. The IPCC explains that global emissions must quickly drop to 20 to 30 Gt annually and then drop sharply toward zero in order to stay within budget. Failure to achieve global targets will result in accelerating feedback loops with irreparable devastation to civilization and advanced life forms on the planet. Feedback loops that adversely impact the probability of limiting warming to specified targets have already been triggered and are not accounted for in the carbon budget models. Furthermore, Global GHG emissions with significant latent negative impacts to the earth’s energy imbalance are still trending upward compounding the urgency to act aggressively...

“Enabling climate resilience and sustainable development depends critically on urgent and ambitious emissions reductions coupled with coordinated sustained and increasingly ambitious adaptation actions (very high confidence).” Natural systems are the most cost effective means of removing carbon from the atmosphere while providing aesthetic value.” [Sustainable Santee Plan]

The DREIR downplays climate change and climate impacts of the project. Climate is not just changing; climate is breaking down at an accelerating pace. The DREIR fails to disclose the role of feedback loops and tipping points that will threaten essential resources, supplies and destabilize governments without drastic changes in cumulative human GHG emissions. Instead, the space devoted to natural emissions serves to confuse the significance of human caused emissions at both the cumulative and project levels.



The DREIR veils climate facts by hedging with unnecessary language, such as “prevailing scientific opinion” (4.7.1) and “scientists believe” (4.7-2) rather than just stating the facts. The DREIR states human activities have caused “substantial quantities of GHGs to be released into the atmosphere”

without discussing the catastrophic impacts of what are in reality massive GHG releases relative to the earth's thin and balanced atmospheric layer essential for regulating energy in and out of the system.

The DREIR uses IPCC 2013 data when using more recent data is available. It casually references projections for a 3-10.5° F temperature rise without any explanation of the significance of outcomes in that range. (4.7-1)

By failing to disclose emissions beyond 2017, the DREIR leaves the reader with the false impression that US emissions are in decline (4.7-4), when the opposite is true for 2018 and 2019. THE DREIR briefly discusses state and Santee emissions without establishing relevance to their significant environmental impacts.

Section 4.7-2 Regulatory Setting fails to disclose Executive Order B-55-18 and the reasons for it. Nor does the DREIR discuss the importance of meeting the directive or how the project impairs the directive. At 4.7-11 the DREIR claims falsely without evidence that the Sustainable Santee Plan "interim and longer-term goals would put the City on a path toward the state's long-term goal to achieve net carbon neutrality statewide by 2045." In fact, a new sprawl project on Fanita Ranch that is not carbon negative would significantly impact and potentially preclude the state's potential to reach carbon neutrality by 2045 by continuing to produce cumulatively significant emissions.

Section 4.7-12 states the GHG threshold of significance utilized is 3.80 MT of GHG emissions per service population (MT/SP) by year 2030 and 3.18 MT/SP by 2035 based upon page 23 of the Sustainable Santee Plan (SSP). Eventually Table 4.7-4 concludes the "Per Capita GHG Threshold for New Development" = 1.77 MTCO₂e/SP. When or where has a future speculative per capita threshold been used as a CEQA compliant significance threshold? It is not credible to assert that these numbers are consistent with state goals when the DREIR has not even acknowledged EO B-55-18, nor the ramifications of failure to meet it's goal of carbon neutrality as soon as possible, no later than 2045, with negative emissions thereafter.

The City is using hocus-pocus math in a vacuum that fails to consider the reality of accelerating climate breakdown as the reason for EO B-55-18. Unsubstantiated "Don't worry - be happy" conclusions are not compliant with CEQA.

A sprawl development on Fanita Ranch would adversely convert lands that remove GHGs from the atmosphere and sequesters GHGs in soils, root structures and canopies into a significant source of GHG emissions.

The project will utilize natural gas at 6 community fire pits, which emits GHG emissions in production, transport and consumption. (Table 4.7-6 PDF-AQ/GHG1) These gas fire pits and the associated impacts are avoidable.

4.7-20 The land use plan with a school would generate "243,266 daily VMT; without a school 249,124 daily VMT or "annually VMT of 84,413,302 and 86,446,028 for the preferred land use plan with school and land use plan without school, respectively."

The project would generate a total service population of 8,424 or 8,345 without a school.

RV/Boat Storage at solar site

What is the capacity of the Recreational Vehicle / Boat storage facility proposed at the terminus of Carlton Hills Boulevard? Solar above/adjacent to a new city park that keeps vegetation over the geologically unstable/soils/slopes might be a compatible use. A vehicle storage yard is not because it

induces the production, ownership and use of these high GHG emitters. Santee's street ordinance and the limited capacity of storage at Santee Lakes serves as incentive not to buy the vehicles. These recreational vehicles require GHGs to produce and are the largest emitting consumer vehicles. The storage facility has unnecessary significant GHG impacts. The storage proposal should be eliminated to reduce the significant GHG impacts of the project.

For the solar facility to remain, sufficient fire hydrants should be installed to protect the arrays from fires under moderate weather conditions. Who will be responsible for replacing the facility if lost by a firestorm under severe weather conditions? Will there be battery storage and what are the impacts if it burns?

Has the applicant considered that an interpretive center/library within a small city park would be a less damaging alternative for the site? The Interpretive Center at Mission Trails Regional Park serves as an example and would not exclude solar energy production.

4.7-24 Mitigation Measures

GHG-1 How does the projected 12 MW of solar production compare as a percentage to the total energy demand projected for the project?

GHG-3 How much water will be captured on site and used to offset demand and how?

GHG-4 All-electric homes are important if all electric demand will be produced on the project site. Will all electric demand be met with solar power produced on site?

Will there be residential energy storage? If so, will it be located inside or outside of the structure? If not, what will be the requirements for addition of battery energy storage by residents?

GHG-5 How many of the 26,705 trees will be long-lived fire resistant species (Coast Live Oaks) and native species that recover from the roots after wildfire?

GHG-6 Please specify what type of electrical vehicles will be "provided" to residents with the purchase on a LDR unit. Why only 100 and what is the anticipated GHG offset for those 100 vehicles? Are the vehicles Tesla or similar capability, or golf carts?

Who would own and maintain the vehicles? Where would they be stored? Would they be available to the public or only to private residents that own them?

Greater explanation for the numbers and underlying assumption presented in Table 4.7-10 is needed.

4.7.5.2 Threshold consistency with Applicable Plan

Carving out a buffer to make allowance for the Fanita Ranch project within the SSP is not appropriate.

4.7-28 Again, It is not credible to assert without evidence the SSP "put the City on a path toward the state's long-term goal to achieve net carbon neutrality statewide by 2045 when the DREIR has not even acknowledged EO B-55-18, nor the ramifications of failure to meet it's goal of carbon neutrality as soon as possible, no later than 2045, with negative emissions thereafter.

In fact, a modestly implemented plan intended to facilitate development is an obstacle to EO B-55-18 because uses once established are extremely difficult to change.

4.7.6.1-2 The DREIR assumes that the project “would achieve consistency with the” SSP and that that would be sufficient to mitigate cumulative impacts to an insignificant level.

Project-generated VMT would be nearly a quarter-million miles DAILY. Rather than a standard year, the applicant uses a 347-day calendar to convert to yearly VMT of 86,446,028 miles attributed to Fanita (versus ZERO today). The missing 18-days would add as much as 4,484,232 additional miles to the yearly total. Furthermore, the applicant utilizes a speculative emissions/pollution model for 2035.

The city has undermined its own climate action plan by failing to initiate the Community Choice Energy program that is the foundation of the Sustainable Santee Plan. Projections and assumptions for achieving emissions targets are no longer valid.

The city rejected invitations from two different regional start-up CCE programs, even though CCE is a foundational element necessary to meet Santee CAP targets. Comments from city council members at hearing demonstrated a hyper-partisan search for excuses used to avoid entering into a partnership with cities with Democratic governing majorities. Santee rejected a no cost invitation to the highest revenue program from the City of San Diego. Cultural differences were specifically cited and irrationally used to reject a CCE partnership with coastal cities. In these circumstances, there is little evidence that Santee will ever enter into a CCE program without a change in city council members.

4.10 Land Use and Planning

Table 4.10-1 “Project Consistency...” does not disclose the significant inconsistencies with the Santee General Plan that requires the applicant to seek amendments. By only discussing the points of consistency it becomes a propaganda table. The table must be modified to disclose the inconsistencies with the current plan as well.

4.12 Noise

The project has “Significant and unavoidable (permanent increase in traffic noise levels).” It should be denied. Intolerable noise impacts will adversely affect Santee Lakes and adjacent neighborhoods.

Princess Joann, Wood Glen Vista and El Nopal neighborhoods affected by the construction of Magnolia Avenue to Cuyamaca would be impacted by permanent unavoidable noise impacts and additional air pollution carried by the traffic.

Double-pane windows and noise walls should be provided to existing residents impacted. How many of these residents have been contacted to determine the feasibility of some mitigation?

4.16 Transportation

The project has significant and unavoidable impacts to intersections, street segments and highways. These impacts adversely impact feasibility of evacuating the existing wildland urban interface and new project residents, which is not disclosed. The project should be denied.

The DREIR fails to recognize Senate Bill 743 (Steinberg 2013) is mandatory as of July 1, 2020. Certainly Santee was aware of SB 743 requirements. Considering that Santee had the ability to require evaluation of Vehicle Miles Traveled (VMT) impacts prior to the July 1 deadline and being fully aware

climate and transportation were issues of controversy, why hasn't Santee as lead agency also insisted upon avoidance and mitigation for VMT impacts consistent with SB 743? The project has significant VMT impacts that are not considered. Reducing unit numbers to levels consistent with the General Plan can avoid VMT and lower fire risk. Avoidance is required.

The DREIR at 4.7.20 discloses "annually VMT of 84,413,302 and 86,446,028 for the preferred land use plan with school and land use plan without school, respectively." Yet, there is not adequate discussion about the impacts of these trips on the environment. What are the environmental impacts of project VMT?

"CARB determined that it will not be possible to achieve the State's 2030 and post-2030 emissions goals without reducing VMT growth." [Technical Advisory on Evaluating Transportation Impacts In CEQA, p. 2]

4.16.6.4 Cumulative Threshold 4: Inadequate Emergency Access

The DREIR conclusion the project's contribution to inadequate emergency access would not be cumulatively considerable is wrong. Facts and the record contradict the conclusion. Simply constructing roads to standard is inadequate when the two arteries must traverse flammable vegetation to connect to an existing circulation system the DREIR acknowledges will be impacted by traffic significantly and unavoidably. The DREIR has not bothered to consider how long it would take to evacuate the project and what the potential heat exposure is along the access roads. The DREIR provides no indication of how quickly or where the roads will be gridlocked and what fuel types are adjacent to them. How will Figure 3-8 Traffic Calming Plan impact the time required to evacuate the project site? Where is the evidence to support the conclusion? In the DREIR's brief summary, the evidence does not exist to support it.

4.18-27-28 provides little more than a map description. This description is completely inadequate when the context of how the circulation map will function in emergency scenarios is not considered. For instance, the two routes out of the project site utilize or cross Mast Boulevard. What is the capacity of Mast Boulevard segments and what are its limitations taking into consideration existing residential surroundings as well as the project site that will converge upon it?

The DREIR provides a false sense of security by referencing "an FPP, a CFPP and a Wildfire Evacuation Plan" coupled with the phrase "to ensure the community would be built to withstand significant fire, provide residents with at least two evacuation routes that lead to at least three major arteries, and offer the contingency option to emergency planners and responders of temporarily refuging persons on site if considered safer than evacuating (Appendices P1 and P2). These documents do not **ensure** anything. In fact, they contain disclaimers and "Limitations" language.

Can the DREIR **ensure** these routes will not be gridlocked?

Can the DREIR **ensure** emergency personnel will be available to assess the threat, identify a viable response strategy and clearly communicate that strategy to operations and the public in a timely manner?

Can the DREIR **ensure** individuals gridlocked adjacent to SH5 and FM4 fuels will survive a burn over?

Can the DREIR **ensure** individuals will remain in their homes if they are told it is too late to evacuate?

Can the DREIR **ensure** occupied homes built at the top of a fire chimney will not ignite?

Can the DREIR **ensure** a single ignited home will not ignite the tightly spaced adjacent homes and initiate a chain of cluster burned occupied structures?

Can the DREIR **ensure** individual homes and adjacent FMZs will be properly maintained over time and that they will never be subjected to severe convective fire behavior?

Can the DREIR **ensure** a Temporary Refuge Area will function adequately to protect individuals and firefighters from radiant heat or direct flame impingement?

The DREIR is fatally flawed without considering these issues.

4.17 Utilities and Service Systems

The project has significant unavoidable impacts and should be denied.

Reference our prior comments on water supply.

Chapter 5 Other CEQA Considerations

[5.4] Where is the evidence to support the contention that the project site was considered for “14,000” units. Repetition does not make a fact. The direct evidence should be provided or the language stricken.

Chapter 6 Alternatives

The project should be denied because it has significant unavoidable impacts.

The courts have directed the applicants to “take all relevant actions necessary to comply with CEQA” yet an Alternative has not been presented that would adequately address fire safety or biological issues that were primary in prior litigation.

A Conservation Alternative that was part of the 1998 EIR and discussed current funding sources was not updated. Please do so as a modification of the “No Project/No Build Alternative.

This discussion should acknowledge that the city blocked the 50% of funds available through the REPI buffer program when there was a willing seller prior to the current applicant gaining control of the land. [City of Santee, Kush to MCAS Miramar, Thornton, May 14, 2010] That program should still be available to prevent encroachment of MCAS-Miramar by the project.

The project has significant impacts upon operations by likely increasing the number of trespassing events that interrupt training activities. The base has also experienced illegal trail building. The DREIR does not disclose the significant encroachment impact issues.

Military flights occasionally crash. A jet crashed on Fanita in the 1980s. Another flight crashed more recently into homes in San Diego. The northern portion of the project is directly under the fixed-wing

landing path. The DREIR does not consider or disclose the significant safety impacts of locating development there. Rotary aircraft fly over the southern portion of the site. The site is subject to extremely high noise levels when either of these flight paths are in use. Significant noise impacts upon future residents are not disclosed.

What are the noise levels at “Orchard Village” and the “Vineyard Village” during flight operations? Residents of “Vineyard Village” will experience the worst noise levels due to the higher elevation. Jets scream over this Fanita mountain location.

6.2.1.1 Impact Analysis

The DREIR failed to consider the alternatives suggested in our prior comments.

Concluding that the No Project/No Build Alternative would have potentially significant indirect species impacts compared to the project is false and not supported by substantial evidence. The statement should be stricken. It ignores the potential for conservation and managed open space as directly evidenced by adjacent open space parks/preserves. [6-5]

The conclusion that the No Project/No Build Alternative would have “potentially greater impacts on emergency access than the proposed project” is false and not supported by substantial evidence. [6-6] The statement should be stricken. The DREIR hasn’t adequately performed basic analysis required to make these determinations – such as study the capacity of Mast Boulevard during various evacuation scenarios. The No Project/No build Alternative avoids the potential evacuation of over 8,000 new residents conflicting with evacuations of existing residents.

The conclusion that the No Project/No Build Alternative would “expose existing residences to wildfires would be potentially greater under this alternative than the proposed project” is false and not supported by substantial evidence. The statement should be stricken. [6-6] [6-7]

The conclusion that the No Project/No Build Alternative “would not benefit from large blocks of open space actively managed as Habitat Preserve because the site would remain unmanaged and continue to be susceptible to degradation over time” ignores the potential for the site to connect as a managed extension of Sycamore Canyon and Mission Trails regional parks. It is false and not supported by substantial evidence. The statement should be stricken. [6-7]

6.2.2 No Project/General Plan Consistency Alternative

“The Santee General Plan currently allows up to 1,395 residential units on the project site and identifies 16 Guiding Principles for its development.” [Fanita Ranch DREIR p. 6-5]

The project is not consistent with the number of units allowed by the Santee General Plan and should be denied due to the significant unavoidable impacts caused by added population density.

All statement suggesting the project or a project alternative lacks conflict with the MSCP Subarea Plan should be stricken. The City has failed to process a **Final** MSCP Subarea Plan consistent with law since completion was promised in 1994. [AR I:193:019286] [6-11] Comparisons to evolving drafts peddle false conservation narratives.

Conclusion

The comments from our prior letters remain relevant. Those points are carried forward.

Sincerely,



Van K. Collinsworth
Geographer/Fire Expert/Director

Prior Professional Fire Experience:
United States Forest Service Wildland Firefighter (Engine and Line Crews 1980-1993)
Cal Fire Defensible Space Inspector (2016-2019)

Exhibit References (filed separately):

- 1: 100 Feet of Defensible Space DSI Checklist**
- 2: Temporary Refuge Area Considerations**
- 3: Cedar Fire Faces**
- 4: FPPC Summary of Enforcement Decisions**
- 5: City of Santee to MCAS Miramar, May 14, 2010**
- 6: Wildlife Agency / City of Santee Email**
- 7: Factors related to building loss due to wildfires in the conterminous United States**
- 8: News 21 State of Emergency**
- 9: RE: Response to Comments/Fanita REIR, Public Safety – Wildland Fire, Agenda Item 2A**
- 10. Lessons Learned from Waldo Canyon**
- 11. SB-474 Very high fire hazard severity zone: state responsibility area: development prohibition (2019-2020)**
- 12. Wine Country requests hundreds of engines in firestorm’s first hours. Less than half came.**
- 13. Federal Register, Fish and Wildlife Service NOI, Santee MSCP 2006**
- 14. Santa Rosa comes to terms with the scale of devastation**
- 15. Mega Fires: The Case for Mitigation**
- 16. High Density Development Damage Comparisons**