

Maricela Hernandez

From: Bob Burris
Sent: Monday, September 27, 2021 10:31 AM
To: Maureen Tamuri; Tom Bartlett; Michael Klein; Maricela Hernandez; Kindon Meik
Cc: Michael Russo; Arvin Petros
Subject: FW: City Council - 9/28/21 Public Hearing - Public Comments Housing Element Update EIR

[Bcc'd to Council](#)

From: Joe Chilco <joe.chilco@gmail.com>
Sent: Sunday, September 26, 2021 1:34 PM
To: info <info@cityofcalabasas.com>
Cc: Michael Klein <mklein@cityofcalabasas.com>
Subject: City Council - 9/28/21 Public Hearing - Public Comments Housing Element Update EIR

Further to my submitted comments on the draft Environmental Impact Report (EIR) for the 2021-2029 Housing Element Update, the following previous comments and responses thereto from staff are provided for your consideration, in addition to my rebuttal comments. For your convenience, I've bolded some text.

COMMENT 1:

“With regard to wildfire risk, the EIR analysis should address the following:

...“Risk” is the potential damage a fire can do to the area under existing conditions.

Homes and structures are fuel...More buildings add to available fuel. Once the buildings are in place the increased risk will exist for as long as they exist. **It has a long-term impact on increased fire risk that is not reduced to less than significant for all residents.”**

RESPONSE 1:

“...The Draft EIR also identified the main factors related to wildfire risk in Calabasas and addition of buildings in the Plan Area was not considered a major factor contributing to wildfire risk.”

REBUTTAL:

We have actual data from the 2018 Woolsey Fire. The Plan Area is the whole city. The addition of buildings is certainly a major factor worth giving consideration.

COMMENT 2:

“While new construction will be built to code, **many existing homes on the west side of Calabasas** were built before any of the benefits that might be derived from new building codes were in place. Some of those older homes **burned in the Woolsey Fire**. The cost of “fire hardening” older homes must be borne by the homeowner.”

RESPONSE 2:

“This comment is related to fire risk associated with older homes....This comment does not contain a substantive comment on the analysis in the Draft EIR and no further response is required.”

REBUTTAL:

Fire risk takes existing conditions into consideration. The Plan Area is the whole city, which includes all existing homes and structures. The reality of what occurred during the Woolsey Fire gives an indication of the potential damage fire can do.

COMMENT 3:

“To address wildfire risk and to ignore reality with regard to the ineffectiveness and inadequacy of the City’s emergency evacuation plan is a deficiency. **The Woolsey Fire emergency evacuation left many residents trapped due to the closure of the 101 freeways, their designated evacuation route.**

...While plans have been put in place in accordance with requirements, **the problem of limited egress that relies on routes that are often impacted in wildfires remains unsolved. There is no opportunity to build new roads.”**

RESPONSE 3:

“This comment is related to the effectiveness of the City’s emergency evacuation system.

...As discussed in Section 4.15, Calabasas disaster preparedness and evacuation planning defines **two evacuation routes for the city: the first is Ventura Freeway (US101) and the second includes Las Virgenes Road, Mulholland Highway, and Old Topanga Canyon Road.** The Emergency Evaluation Assessment reviewed evacuation route capacity during an emergency evacuation event assuming complete evacuation of the city, which may occur during a wildfire. The anticipated travel demand during an evacuation event was compared to the existing roadway capacity. **The Emergency Evaluation Assessment concluded that traffic from buildout of the General Plan Update would be minor compared to existing conditions in the Plan Area.** Therefore, the General Plan Update would not have a significant effect on the transportation system during an evacuation or needed for emergency usage.

The Wildfire Assessment included evaluation of wildfire risk of the proposed housing sites, as described in detail in Section 4.15.3 of the Draft EIR. An assessment of ingress and egress, both for emergency response and evacuation, was included in the analysis. **In the event of the most dangerous type of wildfires, one occurring from prevailing south winds and approaching the City over the heavily wooded landscapes at the southern edges of the Plan Area, none of the proposed housing sites would be cut off from using the defined evacuation routes and US101 evacuation system.** For these reasons, the Draft EIR concluded that buildout associated with the General Plan Update would not substantially affect evacuation routes. No revisions to the Draft EIR are necessary.”

REBUTTAL:

By comparison things are so bad now the buildout couldn’t possibly make it worse? That’s what we’re supposed to accept? **This response doesn’t address the final point in my comment above – limited egress - no new roads.**

With regard to this statement above **“In the event of the most dangerous type of wildfires, one occurring from prevailing south winds and approaching the City over the heavily wooded landscapes at the southern edges of the Plan Area, none of the proposed housing sites would be cut off from using the defined evacuation routes and US101 evacuation system.”**

However, the most devastating and damaging wildfire in recent Calabasas history has been the Woolsey Fire that came from north of the 101 freeway to south. Having lived in Deer Springs since the City’s incorporation, I’ve been here for every fire in the City’s history. Although I recall one that burned across from the high school on Mulholland Hwy, most of the fires came from north to south of the 101 freeway. **The majority of the sites identified on the west side of the city are north of the 101.**

We have actual data from the 2018 Woolsey Fire. We've seen that the emergency evacuation measures in that case were inadequate and ineffective due to the impact on local roads and the freeway.

COMMENT 4:

"People are often the ignition source of urban wildfires. Increased population and traffic in areas reliant on limited egress routes will be a significant fire risk impact of the 2021-2029 Housing Element Update because there is no feasible mitigation."

RESPONSE 4:

"The commenter states that increased population and traffic in areas reliant on limited egress routes would be a significant fire risk impact of the General Plan Update....**Impacts related to wildfire were concluded to be less than significant with compliance to existing regulatory and design standards, review processes, and goals and policies in the General Plan.** Therefore, no mitigation is required. Refer to Response 9.3 for a discussion of impacts related to evacuation routes, including ingress and egress. No revisions to the Draft EIR are necessary."

REBUTTAL:

Building standards can improve the fire resistance of a structure, not make them fireproof. The goals and policies in the General Plan existed during all the previous fires in Calabasas, including the Woolsey Fire, and we all saw what happened then.

With regard to the 1,400 VMT in an emergency evacuation, won't all existing and new residents travel those miles? Won't all those vehicles be traveling on the same roadways at approximately the same time? If the residents are just stuck in bumper-to-bumper traffic, they are not able to quickly evacuate to an area of safety. Adding population will have a significant impact. Without new and reliable ingress/egress evacuation routes, the impact cannot be mitigated.

The cumulative impact on emergency evacuations needs to be considered. It has not been in this case.

The future of the City and its residents will be impacted by the 2021-2029 Housing Element Update to the General Plan.

In planning for our City's future, I ask that the City Council take the cumulative impact into consideration when weighing this significant public safety concern.

Thank you.

Joe Chilco
Calabasas resident
(address on file)