

Comment Response

Feedback on the draft safety element and environmental documentation has been received since presenting to the Lassen County Planning Commission and Board of Supervisors September and October 2022. Following these meetings, the public draft was released for public comment on November 16th, 2022. The project team has documented both informal comments heard during outreach or public meetings and formal written comments received during the public comment period. The comment matrix below lists whether a comment was received formally or informally. All formal comments have been attached as appendices. All comments have been addressed by the County and are detailed on the following comment matrix.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
1	10/11/2022	Informal	Lassen County Board of Supervisors	Lassen County Board of Supervisors	Snow and Extreme Cold should be considered for inclusion.	Draft Safety Element	The County's Multi-Jurisdictional Hazard Mitigation Plan (incorporated by reference) already addresses freezes, severe storms, and avalanche. This safety element augments this information with background and policies related to resilience centers and evacuation. For this reason, policies and actions do not require updates at this time. However, to make pertinent background information readily available for members of the public, a section has been added which briefly describes snow and extreme cold, and references back to the hazard mitigation plan (page 6).

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
1	10/11/2022	Informal	Lassen County Board of Supervisors	Lassen County Board of Supervisors	100 degrees is a better cutoff for extreme heat than 92. Historic data doesn't look correct. Check for a data source out of Reno for historic weather.	Draft Safety Element	The extreme heat day cut off was updated to 100 degrees. No supplemental historic weather data sources with applicable packaged data were found, but the narrative was updated to reflect the variety of conditions experienced across the County (page 6).
1	10/11/2022	Informal	Lassen County Board of Supervisors	Lassen County Board of Supervisors	The Forest Service and Plumas National Forest are major fire risks due to their management.	Draft Safety Element	A sentence was included on page 7 that states these agencies as major land managers of fire risk areas in proximity of Lassen County, and that the Board has stated their displeasure with their land management practices in the past.
1	10/11/2022	Informal	Lassen County Board of Supervisors	Lassen County Board of Supervisors	PG&E needs to be added to the discussion of energy, particularly for the northwestern county, part of Westwood, and Clear Creek.	Draft Safety Element	This context has been added on page 2.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
1	10/11/2022	Informal	Lassen County Board of Supervisors	Lassen County Board of Supervisors	There are more flood zones mapped than what is actually experienced, for example in Ravendale.	Draft Safety Element	Discussed in meeting that this is federal mapping data and no updates are needed at this time.
1	10/11/2022	Informal	Lassen County Board of Supervisors	Lassen County Board of Supervisors	Fire zones may not line up with on the ground conditions.	Draft Safety Element	Discussed in meeting that this is state mapping data and no updates are needed at this time.
1	10/11/2022	Informal	Lassen County Board of Supervisors	Lassen County Board of Supervisors	Bieber demographics (and perhaps other demographic tables) show inaccurate data. For example, it shows no limited English-speaking households are present, but there are limited English-speaking households there.	Draft Safety Element	It was discussed in the meeting that this demographic survey data is collected by the US Census Bureau and is not 100% accurate, especially considering these are small rural communities. Notes have been added below all demographic tables stating that data may not reflect exact conditions.
1	10/11/2022	Informal	Lassen County Board of Supervisors	Lassen County Board of Supervisors	Bieber medical center needs to be added to maps and tables.	Draft Safety Element	Big Valley Health Center has been added to Bieber's profile (page 16).

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
2	10/11/2022	Informal	Thomas Traphagan		Working to gain traction and state funding for a pilot project (mentioned Janesville) that would coordinate agricultural irrigation infrastructure and water sources when fire fighting is needed. Ideally this system is integrated with state firefighting when they take over, etc.	Draft Safety Element	No changes to the Safety Element necessary as a result of this comment. This project is consistent with the Safety Element's policies and goals and future communication with the County is likely.
3	12/2/2022	Informal	Supervisor Albaugh	Lassen County Board of Supervisors	There is an inaccurate reference to a 69 kV line that has been out of commission for many years.	Draft Safety Element	This infrastructure reference has been removed.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
3	12/2/2022	Informal	Supervisor Albaugh	Lassen County Board of Supervisors	The draft has intensive ag zoning for our project site, when the area near the railroad should be industrial.	Draft Safety Element	The reference to Intensive Ag is intended to reference land use in Nubieber, not zoning. To meet recommendations from OPR and CALFIRE, the Safety Element describes land use designations, existing development, and their spatial relation to fire hazard severity zones. For that reason, zoning does not need to be discussed here. The land use descriptions have been reviewed and were adjusted to make these descriptions clear (page 74).
3	12/2/2022	Informal	Supervisor Albaugh	Lassen County Board of Supervisors	The railroad spur should be called out as an amenity/benefit.	Draft Safety Element	Nubieber's profile has been updated to include the railroad spur as an asset in both the text and on the critical assets table (page 69).

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
3	12/2/2022	Informal	Supervisor Albaugh	Lassen County Board of Supervisors	Nubieber's table shows no children, which is inaccurate.	Draft Safety Element	It was discussed in the meeting that this demographic survey data is collected by the US Census Bureau and is not 100% accurate, especially considering these are small rural communities. Notes have been added below all demographic tables stating that data may not reflect exact conditions.
3	12/2/2022	Informal	Supervisor Albaugh	Lassen County Board of Supervisors	The number of days over 90 degrees is much more common than the 3-4 days per year described.	Draft Safety Element	The extreme heat day cut off was updated to 100 degrees. No supplemental historic weather data sources with applicable packaged data were found, but the narrative was updated to reflect the variety of conditions experienced across the County (page 6).
3	12/2/2022	Informal	Supervisor Albaugh	Lassen County Board of Supervisors	The escape route for Nubieber calls out Kramer and 4 Corners, which has a section that has been washed out for many years.	Draft Safety Element	The related text has been updated to note this (page 70), and it has been prioritized for maintenance in Policy 2.3d.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
3	12/2/2022	Informal	Supervisor Albaugh	Lassen County Board of Supervisors	Please verify the accuracy of the zoning references for Nubieber and Bieber, there seem to be inaccuracies in the draft.	Draft Safety Element	To meet recommendations from OPR and CALFIRE, the Safety Element describes land use designations, existing development, and their spatial relation to fire hazard severity zones. For that reason, zoning does not need to be discussed here. The land use descriptions have been reviewed and were adjusted to make these descriptions clear.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
4	12/6/2022	Formal	Todd Eid	Lassen County LAFCO	How will the County maintain internal consistency with several General Plan elements being adopted at various times?	Draft Safety Element	The Safety Element's components and requirements are related to other general plan elements and content overlaps with other planning documents such as the hazard mitigation plan (HMP) and emergency operations plan (EOP). This safety element update effort involved a thorough review of the existing general plan, HMP, EOP, and previous safety element alongside state requirements of safety elements. The results of this review were incorporated into the Safety Element and ensure that requirements are satisfied without causing inconsistencies or needlessly duplicating work.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
4	12/6/2022	Formal	Todd Eid	Lassen County LAFCO	The Herlong Fire Department is a division of the Herlong Public Utility District, the Westwood Fire Department is a division of the Westwood Community Services District and Spalding Fire Department is a division of the Spalding Community Services District. The Stones-Bengard CSD, Little River and the Clear Creek CSD also have fire departments. Instead of using the terminology "Fire Districts" could "Local Fire Agencies" be used.	Draft Safety Element	The "Fire District" terminology has been modified globally to "Local Fire Agencies" and the list of local fire agencies has been updated to reference the most specific division of a local fire agency (page 8).
4	12/6/2022	Formal	Todd Eid	Lassen County LAFCO	We did not notice references to Emergency Medical Response. This is one of the major tasks of a local fire department. In the Big Valley area the Southern Cascades Community Services District provides emergency medical services and training. Also in the Susanville area there are ambulance services provided.	Draft Safety Element	Additional context has been added (page 8) related to emergency medical response.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
4	12/6/2022	Formal	Todd Eid	Lassen County LAFCO	Regarding Communications Equipment (Action 2.3h) would it be feasible to involve the fire agencies in the procurement, funding, and the use of standard communication equipment.	Draft Safety Element	Fire agencies have been added to the list of partners in the implementation table, for future involvement.
4	12/6/2022	Formal	Todd Eid	Lassen County LAFCO	We recall there was a provision in the California Code requiring newly created parcels to be within a fire agency's jurisdiction. Within reason, would it be possible to have a statement in the implementation plan regarding new parcel splits in the unincorporated portions of the County be in a fire protection district?	Draft Safety Element	This is something that is already addressed within the County's Land Use Element (Policy LU 10), and is also addressed by in the Westwood/Clear Creek Area Plan (Policy LU 6). The Safety Element's policies are consistent with this and do not require change at this time.
4	12/6/2022	Formal	Todd Eid	Lassen County LAFCO	Unlike most cities, weed abatement is a challenge for rural areas (Action 1.4b). Most if not all fire agencies in the County have volunteer staff and weed abatement becomes a low priority. Is there a possibility the County Fire Marshal or a department within the County structure enforce weed abatement?	Draft Safety Element	Planning and Building Services has been added to the implementation table as a responsible party (alongside the fire agencies), and will work to enforce this program as feasible.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
4	12/6/2022	Formal	Todd Eid	Lassen County LAFCO	With respect to Hazmat Training (Action 2.3f) would it be possible to include the fire agencies in trainings since many of the fire agencies are first responders?	Draft Safety Element	Fire agencies were already included on the list of partners in the implementation table for future involvement, so no changes are needed at this time.
5	12/12/2022	Formal	Tina Bartlett	CDFW	The Safety Element's adoption would not, in itself, produce environmental impacts therefore, the Department has no comment.	Draft Initial Study and Negative Declaration	Thank you for your comment.

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
6	12/15/2022	Formal	Jared Peri	Cal OES	<p>The jurisdiction must update the Safety Element of their general plan to include language referring to the LHMP, and direct the reader to the location of the LHMP. The direction component can be done by inserting a weblink to the current HMP, or by including directions to where it can be found. As long as the date or year of the current HMP isn't referenced, the jurisdiction will only have to make this change to the Safety Element once. If the Safety Element has the year of the expired HMP, or the HMP is inserted into the Safety Element, it will have to be revised.</p>	Draft Safety Element	<p>The Safety Element references the County's Multi-Jurisdictional Hazard Mitigation Plan and includes a link to this plan.</p>

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
6	12/15/2022	Formal	Jared Peri	Cal OES	<p>Required Contents the safety element must, consistent with Government Code Section 65302(g), provide for the protection of the community from any unreasonable risks associated with the effects of:</p> <ul style="list-style-type: none"> • Seismically induced surface rupture, ground shaking, ground failure • Tsunami, seiche, and dam failure • Slope instability leading to mudslides and landslides • Subsidence • Liquefaction • Other seismic hazards identified pursuant to Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body • Flooding • Wildland and urban fires • Climate change 	Draft Safety Element	<p>While some hazards listed in this comment may not be listed verbatim as a hazard in the hazard mitigation plan or safety element they are addressed. For example, climate change is addressed for every applicable hazard in both plans. Other hazards like subsidence and liquefaction are limited in their risk to the County, and as such are referenced within other sections.</p>

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
7	12/16/2022	Formal	Erik Frost	CGS	<p>On page 2, the Draft Safety Element states: "Active faults are identified by the U.S. Department of Conservation, and construction of new development is prohibited in areas around them to prevent repetitive loss of structures and threats to the safety of occupants. These unsafe areas around active faults, generally 50 feet, are regulatory zones referred to as Alquist-Priolo earthquake fault zones." There are a number of inaccuracies in this statement. The County should refer to CGS Special Publication 42 and revise this section of the Safety Element to accurately summarize the roles and responsibilities of the State, lead agencies, and owners/developers.</p>	Draft Safety Element	Safety Element content has been updated to meet the specified suggestions by CGS (page 2).

Comment Number	Date	Comment Status	Commenter	Organization	Specific Comment	Related Document	Addressed
8	12/23/2022	Formal	Cheryl Hayhurst	CGS	<p>Post-wildfire impacts can be life threatening and devastating to property and critical assets. CGS recommends expanding the wildfire hazard discussion to include potential post-wildfire impacts such as flooding and debris flow hazards. The following resources from the recent Governor's Office of Planning and Research Flood-After Fire Resilience Plan Alignment Guide can be reviewed for additional guidance: https://opr.ca.gov/news/2022/11-16.html and https://resilientca.org/plan-alignment/.</p>	Draft Safety Element	<p>Added context to the wildfire findings section (page 87) to include discussion of post-wildfire impacts. Updated Policy 4.2a to specify post-wildfire risk assessments.</p>

Appendix

Formal Comments

LASSEN LOCAL AGENCY FORMATION COMMISSION

December 6, 2022

Mr. Maurice Anderson, Planning Director
c/o Lassen County Planning Department
707 Nevada Street, Suite 5
Susanville, Ca 96130-3912

Re: General Plan Comments: Safety Element

Dear Mr. Anderson:

The Local Agency Formation Commission is writing you regarding the Draft Lassen County General Plan Safety Element. It is our understanding this element has not been approved by the Planning Commission who will provide a recommendation to the Board of Supervisors.

As stated in the draft "The Safety Element is intended to reduce the risks associated with these hazards and help the County prepare for and avoid emergency situations" This element provides an overview, Flood Hazards, Dam Failure Inundation, Fire hazards, Geotechnical hazards, Hazardous Materials and Emergency Evacuation.

With respect to this element, we have the following comments:

We will begin with a general comment regarding General Plan internal consistency. LAFCo is mindful of the costs of preparing a comprehensive General Plan. With the number of mandated General Plan elements, LAFCo is concerned about how the County would maintain (or is maintaining) internal consistency since many of these elements have been adopted at various times.

Page 8 - The Herlong Fire Department is a division of the Herlong Public Utility District, the Westwood Fire Department is a division of the Westwood Community Services District and the Spalding Fire Department is a division of the Spalding Community Services District. The Stones-Bengard CSD, Little River and the Clear Creek CSD also have fire departments. Instead of using the terminology "Fire Districts" could "Local Fire Agencies" be used.

Page 8 - We did not notice references to Emergency Medical Response. This is one of the major tasks of a local fire department. In the Big Valley area the Southern Cascades Community Services District provides emergency medical services and training. Also in the Susanville area there are ambulance services provided.

LAFCo is currently working with the Fire and EMS agencies in Lassen County to help promote efficient fire and EMS service delivery. LAFCo continuously updates information with respect to Service Reviews and Spheres of influence for local fire agencies.

LAFCo is very pleased with the implementation plan in the document. Of course, the issue will be as to whether or not the County has the staffing capacity to implement the many items in the plan.

RECEIVED

DEC 13 2022

Regarding Communications Equipment (Action 2.3h) would it be feasible to involve the fire agencies in the procurement, funding, and the use of standard communication equipment.

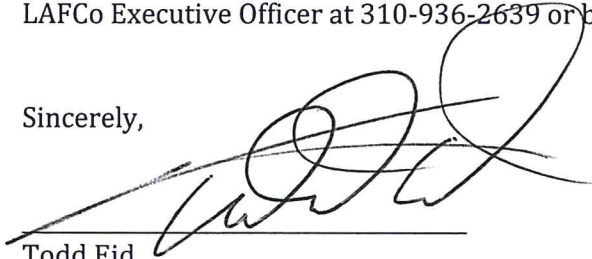
We recall there was a provision in the California Code requiring newly created parcels to be within a fire agency's jurisdiction. Within reason, would it be possible to have a statement in the implementation plan regarding new parcel splits in the unincorporated portions of the County be in a fire protection district.

Unlike most cities, weed abatement is a challenge for rural areas (Action 1.4b). Most if not all fire agencies in the County have volunteer staff and weed abatement becomes a low priority. Is there a possibility the County Fire Marshal or a department within the County structure enforce weed abatement?

With respect to Hazmat Training (Action 2.3f) would it be possible to include the fire agencies in trainings since many of the fire agencies are first responders?

On behalf of the Local Agency Formation Commission we thank you for the opportunity to provide these preliminary comments on the draft. If LAFCo can provide further advice or assistance on any of these points, please do not hesitate to contact Jennifer Stephenson, LAFCo Executive Officer at 310-936-2639 or by email at jennifer@pccateam.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Eid', is written over a horizontal line. The signature is stylized and cursive.

Todd Eid
Chair, Lassen LAFCo

Nancy McAllister

From: Peri, Jared@CalOES <Jared.Peri@CalOES.ca.gov>
Sent: Thursday, December 15, 2022 3:24 PM
To: Land Use
Cc: Boemecke, Wendy@CalOES
Subject: Safety Element Update Comments- Lassen County

This message comes from an external sender. EXTERNAL SENDER WARNING!

Cal OES has reviewed the Safety Element Update to the General Plan. Our office has a couple of comments.

The Safety Element addresses or will address the following hazards:

Earthquake/ Geologic Hazards
Extreme Cold
Extreme Heat
Flooding
Wildfire

When reviewing your FEMA adopted Local Hazard Mitigation Plan we find that the identified hazards are as follows:

Avalanche
Dam Failure
Drought
Earthquake
Extreme Cold
Extreme Heat
Flooding
Landslide
Severe Storm
Volcano
Wildfire

Below is the link to the California Office of Planning and Research Safety Element Guidelines

[General Plan Guidelines, Chapter 4: Required Elements \(ca.gov\)](#)

Required Contents the safety element must, consistent with Government Code Section 65302(g), provide for the protection of the community from any unreasonable risks associated with the effects of:

- Seismically induced surface rupture, ground shaking, ground failure
- Tsunami, seiche, and dam failure
- Slope instability leading to mudslides and landslides
- Subsidence

- Liquefaction
- Other seismic hazards identified pursuant to Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body
- Flooding
- Wildland and urban fires
- Climate change

As an additional note while you are making changes to your Safety Element, we wanted to point out **some** of the steps that are required to become AB2140 complaint. The jurisdiction must update the Safety Element of their general plan to include language referring to the LHMP, and direct the reader to the location of the LHMP. The direction component can be done by inserting a weblink to the current HMP, or by including directions to where it can be found. As long as the date or year of the current HMP isn't referenced, the jurisdiction will only have to make this change to the Safety Element once. If the Safety Element has the year of the expired HMP, or the HMP is inserted into the Safety Element, it will have to be revised.

- a. Sample language to add to the Safety Element includes: "The Local Hazard Mitigation Plan (LHMP) for the City of XYZ planning area was developed in accordance with the Disaster Mitigation Act of 2000 (DMA 2000) and followed FEMA's 2011 Local Hazard Mitigation Plan guidance. The LHMP incorporates a process where hazards are identified and profiled, the people and facilities at risk are analyzed, and mitigation actions are developed to reduce or eliminate hazard risk. The implementation of these mitigation actions, which include both short-term and long-term strategies, involve planning, policy changes, programs, projects, and other activities. The Local Hazard Mitigation Plan can be found at this location (Insert web link, or the actual LHMP, or guidance to where the LHMP can be located)."

Thank you for the opportunity to review and comment.

Jared Peri, Senior Emergency Services Coordinator
 Hazard Mitigation Planning Division
California Governor's Office of Emergency Services



Mobile: (916) 524-3470

Email: Jared.Peri@caloes.ca.gov

Program Email: mitigationplanning@caloes.ca.gov



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



December 12, 2022

Nancy McAllister
Lassen County Department of Planning and Building
707 Nevada Street, Suite 5
Susanville, CA 96130

**Subject: Review of Lassen County Safety Update, State Clearinghouse
Number 2022110358, Lassen County**

Dear Nancy McAllister,

The California Department of Fish and Wildlife (Department) has reviewed the draft Initial Study and Negative Declaration (ISND), dated November 2022, for the above referenced project (Project). The Department's review of this Project is pursuant to our role as the State's trustee agency for fish and wildlife resources under the California Environmental Quality Act, California Public Resources Code section 21000 et seq. As described in the ISND, the Safety Element is a policy document that establishes the County's goals, policies and actions related to the natural and human-caused hazards and the risk to human life, property damage, and economic and social dislocation from hazard events within the County. Its adoption would not, in itself, produce environmental impacts therefore, the Department has no comment.

We appreciate the opportunity to comment on the Project to assist the County of Lassen in adequately analyzing and minimizing/mitigating impacts to biological resources. If you have any questions, please contact Erika Iacona, Environmental Scientist, by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Tina Bartlett

Tina Bartlett, Regional Manager
Northern Region

ec: State Clearinghouse
State.Clearinghouse@opr.ca.gov

Erika Iacona
R1CEQARedding@wildlife.ca.gov

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DEC 16 2022

LASSEN COUNTY DEPARTMENT OF
PLANNING AND BUILDING SERVICES

Conserving California's Wildlife Since 1870

Nancy McAllister

From: Frost, Erik@DOC <Erik.Frost@conservation.ca.gov>
Sent: Friday, December 16, 2022 9:47 AM
To: Land Use
Cc: OPR State Clearinghouse; OLRA@DOC
Subject: Draft Lassen County Safety Element (SCH #2022110358) - CGS comments

Follow Up Flag: Follow up
Flag Status: Flagged

This message comes from an external sender. EXTERNAL SENDER WARNING!

Hello Nancy McAllister,

The California Geological Survey (CGS) has received a Notice of Completion for the Lassen County Draft Safety Element. This email conveys the following comments from CGS concerning geologic issues related to the planning area:

1. Fault Rupture Hazards

On page 2, the Draft Safety Element states:

“Active faults are identified by the U.S. Department of Conservation, and construction of new development is prohibited in areas around them to prevent repetitive loss of structures and threats to the safety of occupants. These unsafe areas around active faults, generally 50 feet, are regulatory zones referred to as Alquist-Priolo earthquake fault zones.”

There are a number of inaccuracies in this statement. The County should refer to CGS Special Publication 42 and revise this section of the Safety Element to accurately summarize the roles and responsibilities of the State, lead agencies, and owners/developers. Specifically:

- “Active” faults are better described as “Holocene-active” faults;
- It is the responsibility of the State Geologist, not the U.S. Department of Conservation, to compile maps delineating earthquake fault zones;
- Construction is not prohibited within Alquist-Priolo earthquake fault zones;
- Alquist-Priolo earthquake fault zones typically extend for several hundred feet to either side of mapped fault trace. Setback zones recommended as part of site-specific fault investigations triggered by the Alquist-Priolo Earthquake Fault Zoning Act are commonly 50 feet, although there is no default or minimum setback distance included in the Alquist-Priolo Earthquake Fault Zoning Act.

The County may also wish to cite the following website, which will always provide an up-to-date map of earthquake zones of required investigation:

<https://maps.conservation.ca.gov/cgs/EQZApp/app/>

If you have any additional comments or questions, please feel free to call or email.

Erik

Dr. Erik Frost

Senior Engineering Geologist | Seismic Hazards Program
California Geological Survey
715 P Street, MS 1901, Sacramento, CA 95814
(916) 205-8255
erik.frost@conservation.ca.gov



California
**Department of
Conservation**
California Geological Survey

Gavin Newsom, Governor
David Shabazian, Director

715 P Street, MS 1901, Sacramento, CA 95814
T: (916) 445-1825 | F: (916) 445-5718
conservation.ca.gov

MEMORANDUM

DATE: December 23, 2022
TO: Nancy McAllister
Planner
FROM: Cheryl Hayhurst
Senior Engineering Geologist
SUBJECT: Lassen County Safety Element Update – SCH# 2022110358

Dear Ms. McAllister,

The California Department of Conservation, California Geological Survey (CGS) has reviewed the Draft Lassen County Safety Element Update. We offer the following comments and recommendations with respect to wildfire.

Project Description:

The proposed project is an update to the Safety Element of the Lassen County General Plan. The Safety Element identifies hazards and hazard abatement provisions to guide land use decisions related to zoning, subdivisions, and entitlement permits.

CGS Comments:

The Draft Lassen County Safety Element Update discusses wildfire hazard and includes discussion of community and critical asset locations within Fire Hazard Severity Zones, historic fire history, and whether communities are a certified Firewise Community. It also discusses Goals and Policies which include such items as defensible development, fuels management, and public education. These discussions generally seem from a largely pre-wildfire prevention and mitigation planning perspective. Post-wildfire impacts can be life threatening and devastating to property and critical assets. CGS recommends expanding the wildfire hazard discussion to include potential post-wildfire impacts such as flooding and debris flow hazards. The following resources from the recent Governor's Office of Planning and Research Flood-After Fire Resilience Plan Alignment Guide can be reviewed for additional guidance: <https://opr.ca.gov/news/2022/11-16.html> and <https://resilientca.org/plan-alignment/>.



California
**Department of
Conservation**
California Geological Survey

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David Shabazian, Director

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conservation.ca.gov

Thank you for giving us the opportunity to comment on the Draft Lassen County Safety Element Update. If you have any questions or concerns regarding the comments in this letter, please contact Cheryl Hayhurst, Senior Engineering Geologist, at 715 P Street, MS 1901, Sacramento, California 95814, (916) 445-1825, Cheryl.Hayhurst@conservation.ca.gov.

Sincerely,

DocuSigned by:
Cheryl Hayhurst
9CC5DD4A37CD434

December 23, 2022

Cheryl A. Hayhurst, CEG 2639
Senior Engineering Geologist
Sacramento, California

