# 4.16 WILDFIRE

SECTION 4.0

# 4.16 WILDFIRE

This Draft Environmental Impact Report (Draft EIR) analysis section considers the potential for the North Canyon Ranch residential project and the Required Island Annexations (together forming the whole project for the purposes of this Draft EIR) to result in impacts related to wildfires and identifies opportunities to avoid, reduce, or otherwise mitigate potential significant impacts related to wildfire, where warranted.

This analysis consists of a description of the existing conditions at the proposed project site and surrounding area, a summary of the regulatory framework that guides the decision-making process, thresholds for determining if the proposed project would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and residual impacts (i.e., level of significance after mitigation). The significance of project impacts has been determined in accordance with Appendix G of the California Environmental Quality (CEQA) Guidelines, and additional regulatory agency requirements, where they apply. Sources used in the analysis are cited herein where relevant to the analysis; comprehensive list of references is provided Section 7.0, Organizations and Persons Consulted and References, of this Draft EIR. Project-related reports and materials to support this wildfire analysis are provided in Section 7.0, Organizations and Persons Consulted and References, of this Draft EIR. Project-related reports and materials to support this analysis are provided in **Appendix J, Fire Protection**, including the mapped Fuel Modification Plan and Preliminary Fire Protection Plan (FPP) for North Canyon Ranch.[1]

## 4.16.1 Existing Conditions

The environmental setting and regulatory setting, below, establish existing conditions relevant to the project. The analysis of project impacts is based upon these baseline conditions.

## Environmental Setting

The environmental setting is a description of the physical environmental conditions on and in the vicinity of the project site.

### *Project Components*

#### North Canyon Ranch

The proposed North Canyon Ranch residential development project site is located within an approximately 160-acre undeveloped property in unincorporated Ventura County, adjacent to the City's northwest boundary. There are currently no housing units or permanent population on the project site. The project site property is located within the City's Sphere of Influence (SOI) and City Urban Restriction Boundary (CURB) area in the current Simi Valley General Plan, thus anticipating future development on the site. The project applicant is requesting that the project site be annexed into the City boundary. Existing land uses adjacent to the proposed development area consist of multi-family residences as well as commercial uses and stores associated with the Simi Valley Town Center Mall to the south, single-family residences to the east, and open space to the north and west. The southwestern corner of the development area is located at the northern terminus of First Street, and the eastern side of the development area is located at the western terminus of Falcon Street, which the project would extend westerly through the project site to connect with First Street.

[1] FIREWISE 2000, LLC, North Canyon Ranch Preliminary Fire Protection Plan, Tentative Tract No. 5658. Simi Valley, California, Revised November 22, 2023. VCFD preliminary approval, December 18, 2023.

The North Canyon Ranch site, located at the wildland urban interface (WUI), is designated within a State Responsibility Area (SRA) Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Regulation (CAL FIRE)[2] and as a VHFHSZ by the Ventura County Fire Protection District (Fire Department, or VCFD), and reflected in the existing Simi Valley General Plan and the associated General Plan EIR.[3] The VCFD provides fire protection services within the City, including the project site. With approval of the project, the SRA designation will change to a Local Responsibility Area (LRA) designation.

The vegetation at the site consists of coastal sage scrub, small patches of cactus scrub, highly disturbed non-native grass/forb habitats, and riparian scrub at some locations along drainage courses and within debris basins. As stated, the majority of the natural habitats at the site are disturbed to varying degree by grazing. Previously modified areas include some large, graded areas, unimproved dirt roads, fill dirt, artificial slopes with concrete terrace drains, and two debris basins, which protect urban areas to the south from stormwater and debris flows. Artificial ditches have been constructed to direct stormwater flows around the perimeter of previously graded areas. Some "two-track" roads traverse the north-south trending ridgelines, which continue off-site. Envicom Corporation biological resources field notes identify that there is also a fuel reduction zone maintained along the eastern boundary, which protects the neighboring residential development. Three fires have burned the site since 1958. The Brea Canyon Fire of 1958 burned the western edge and the southwestern corner of the site, while the Clampitt Fire burned the entire site in 1970. The most recent fire to burn the site was the Simi Fire of 2003, which burned nearly the entire site leaving only the southeastern corner unaffected.

## Required Island Annexations

The project would include the annexation of nine Island areas from the County of Ventura to the City. The Islands are surrounded on at least three sides by City jurisdiction and consist of parcels that are mostly developed for residential use (i.e., single-family homes and several duplexes). A total of five undeveloped lots within these unincorporated areas, which are located adjacent to existing development, could potentially be developed with five dwelling units. For the purposes of CEQA, the only action for this part of the project is for the Ventura County Local Agency Formation Commission (LAFCo) to approve annexation of the Island properties to the City, and no physical changes in land use or infrastructure within these properties is proposed as part of this project. The VCFD provides fire protection services to the sites, and would continue to do so following annexation, as the City is serviced by VCFD.

All of the Islands are located within a Local Responsibility Area (LRA). The entirety of Island areas 1, 3, 6, 7 and 9 and portions of area 2 are shown within a VHFHSZ by CAL FIRE[4] and on the Simi Valley General Plan Fire Hazard Figure and General Plan EIR Wildfire Hazard Area Figure.[5] Islands 8 and 4, which are located further from the wildland-urban interface, are the only Required Island Annexation areas outside the VHFHSZ.

[2] FRAP, Fire Hazard Severity Zone Viewer, Accessed on September 21, 2022 at: https://egis.fire.ca.gov/FHSZ/.
[3] City of Simi Valley, General Plan EIR, Chapter 4 (Section 4.8-Hazards and Hazardous Materials), Figure 4.8-1, Wildfire Hazard Area, June 2012; and City of Simi Valley, General Plan, Safety and Noise Element, Figure S-2, Fire Hazard, June 2012.
[4] FRAP, Fire Hazard Severity Zone Viewer, Accessed on September 21, 2022 at: https://egis.fire.ca.gov/FHSZ/.
[5] City of Simi Valley, General Plan EIR, Chapter 4 (Section 4.8-Hazards and Hazardous Materials), Figure 4.8-1, Wildfire Hazard Area, June 2012.

## *Area Fire Setting*

### Wildland Fire Factors

Wildland fire generally refers to a fire that occurs within a suburban or rural area that contains uncultivated lands, timber, watershed, brush or grasslands, including areas in which there is a mingling of developing and undeveloped lands. Fires have played a natural part of the Southern California ecosystem for thousands of years, however, with the spread of urban development and increasing climate change, wildland fires have come to represent a significant hazard to life and property.

The undeveloped North Canyon Ranch project site is located adjacent to the City, which is susceptible to wildland fires. Generally, the wildland fire season extends from early spring to late fall; however unseasonable hot, dry or windy weather conditions can present wildland fire hazards at any time. Hazards arise from a combination of hot weather, an accumulation of vegetation, and low moisture content of the air. These conditions, if coupled with high winds and years of drought, can compound the potential impact of a fire.

Cities such as Simi Valley that are built within or adjacent to hillsides or mountainous areas, have increased the number of people living near heavily vegetated areas where wildlands meet urban development. As noted earlier, this interface is also referred to as the WUI. A fire along the WUI can result in major losses of property and structures unless adequate protection measures have been provided. As discussed further below in Regulatory Setting, CAL FIRE has adopted WUI regulations as part of the California Building Standards Code (CBSC) and California Fire Code (CFC), as adopted by the Simi Valley Municipal Code (SVMC). The WUI includes building materials list, construction methods, as well as project siting requirements to lessen the potential impacts of wildland fires on urban uses. Although there is existing urban development to the east and south, the proposed North Canyon Ranch project would be on the WUI, and thus of concern for wildfires.

Generally, there are three major factors that sustain wildfires and allow for predictions of a given area's potential to burn. These factors include fuel (materials that feed a fire), topography, and weather. addition, other factors complicate the issues, including the WUI, diversified responsibility for wildland vegetation management, destructive insects, and diseases. Other causes of wildfires include power line failure, sparks from off-road vehicles, construction equipment, and other power-driven equipment used in industry, agriculture, and recreation. In developed areas, wildfires can start from humans, bonfires, rubbish burning, sparks from chimneys, and fireworks. Natural causes, primarily lightning, are now relatively minor causes of local fires. Rugged terrain will also hinder fire suppression attempts by hampering the mobility and effectiveness of firefighters and equipment.

The Simi Valley General Plan EIR identified the integration of five fire determinants (human proximity, vegetation, access, slope, wind direction) to delineate four natural fire hazard potential zones in the City. As stated in the Plan, high risk equates to areas lying to the immediate west of developed areas; chaparral or dense sage scrub cover; very steep (40 percent) slope; and somewhat limited access. Medium risk equates to areas fronting developments and backcountry, sage scrub and less developed chaparral cover, moderate (20 to 40 percent) slope, and somewhat limited access. Low risk equates to areas in the vicinity of developed property; grassland and less developed sage scrub cover; level to gentle (0-20 percent) slope; and available access. No risk equates to developed areas; cultivated urban cover; flat slope; and available urban access. The project site area falls within a LRA VHFHSZ and is within a high risk area.[6]

[6] City of Simi Valley, General Plan EIR, Chapter 4 (Section 4.8-Hazards and Hazardous Materials), June 2012.

## Wildfire Pollutants and Air Quality

Wildfire smoke – a complex mixture of air pollutants – is unhealthy to breathe and can be especially dangerous for children, the elderly, pregnant women and people with heart or respiratory conditions. These sensitive groups are advised to limit outdoor activities, especially when the Air Quality Index reaches levels considered "Unhealthy for Sensitive Groups" or above. Even healthy people may experience symptoms in smoky conditions or after exposure.[7]

Wildfires produce a range of harmful air pollutants, from known cancer-causing substances to tiny particles that can aggravate existing health problems and, particularly with long term exposure, can increase the risk of heart attack or stroke. Particulate Matter (PM) is the principal pollutant of concern from wildfire smoke for the relatively short-term exposures (hours to weeks) typically experienced by the public. Particles from smoke tend to be very small (with diameters of 2.5 micrometers and smaller, i.e., $PM_{2.5}$). They are small enough to get deep into the lungs and the smallest, ultrafine particles can pass directly into the bloodstream. The association between $PM_{2.5}$ and heart and lung health effects are well documented in scientific literature.

Larger and more frequent and intense wildfires are a growing public health problem, contributing to reduced air quality for people living near or downwind of fire. Health problems related to wildfire smoke exposure can be as mild as eye and respiratory tract irritation and as serious as worsening of heart and lung disease, including asthma, and even premature death.[8]

## Ventura County Fire Protection District/Wildland Fire Division

As discussed in Draft EIR Section 4.13.1, Fire and Ambulance Services, the VCFD provides fire prevention, fire suppression, and emergency services in Simi Valley. Fire protection for the County is provided by five battalions, which are comprised of 33 fire stations, staffed 24 hours per day, 365 days per year. Battalion 4 serves the cities of Simi Valley and Moorpark, and the surrounding unincorporated areas with seven fire stations providing fire and rescue response in the Battalion service area.

The VCFD maintains six fire stations within the boundaries of the City, as listed in Table 4.16-1 Fire Stations in Simi Valley. The nearest fire station to the project site is Station 47, which is located approximately 0.3 miles from the project site boundary. **Table 4.16-1, Fire Stations in Simi Valley** provides a list of VCFD stations in the project vicinity, and available apparatus at each location.

In addition, the VCFD has a wildland fire protection strategy that includes the following components: prevention, passive protection, fire suppression, and fuel bed management. The VCFD's Wildland Fire Division, within the Bureau of Support Services, also provides safety and tactical education and training in wildland incident responses for employees. The Division sustains a long-term plan of maintaining a patchwork of modified fuel beds to control historical wildland fires that provide control zones for assets of value and range improvement.

[7] California Air Resources Board, Protecting Yourself from Wildfire Smoke, Accessed on September 28, 2022 at: https://ww2.arb.ca.gov/protecting-yourself-wildfire-smoke/.

[8] Ibid.

**Table 4.16-1**
**Fire Stations in Simi Valley**

| Station # | Address | Personnel | Apparatus | Distance from Project [a] |
|---|---|---|---|---|
| 47 | 2901 Erringer Rd.<br>Simi Valley, CA | 3 firefighters | medic-engine; a reserve ladder truck; utility unit | 0.3 mile |
| 45 | 790 Pacific Ave.<br>Simi Valley, CA | 3 firefighters | engine; reserve engine; foam unit; dozer | 2 miles |
| 41 | 1910 Church St.<br>Simi Valley, CA | 1 chief<br>9 firefighters | engine; ladder truck; reserve engine; command vehicle, Rescue Ambulance | 3 miles |
| 46 | 3265 Tapo St.<br>Simi Valley, CA | 3 firefighters | engine; reserve engine | 4 miles |
| 44 | 1050 Country Club Dr.<br>Simi Valley, CA | 4 firefighters | rescue engine (*Quint*); reserve engine; reserve ladder truck | 5 miles |
| 43 | 5874 E. Los Angeles Ave.<br>Simi Valley, CA | 3 firefighters | medic-engine, brush engine, utility pickup | 7 miles |

Source: Ventura County Fire Protection District website, Accessed on September 21, 2022 at: http://fire.countyofventura.org.
[a] Approximated driving distance (road miles).

As stated in the General Plan EIR, due to Ventura County's diverse geography and six different microclimates, the County is broken down into ten different "fuel beds" that serve as the geographical basis from which the plan was developed. The City planning area is within two fuel beds: the Simi Fuel Bed and the Oakridge Fuel Bed. The project site is located within the Oak Ridge Fuel Bed, which is bordered on the north by the Santa Clara River, on the south by the Simi fuel bed, on the east by the Los Angeles/Ventura County line and on the west by Highway 23. The ground cover of the bed consists of medium brush on the north slope and light, flashy fuels on the south slope. The predominant risk exposure in this area is the interface area along the northern boundary of the City. As this residential area grows, so does the risk from wildfire.[9]

## Emergency Preparedness

The County of Ventura and the City both implement programs to facilitate emergency preparedness. Specifically, the County of Ventura's Office of Emergency Services (OES) administers the County's disaster preparedness and response program and development of the County's Emergency Response Plan. The Emergency Operations Center (EOC) is a centralized location for coordinating countywide emergency response activities. The EOC is the coordination point between the cities, special districts and the State OES. The EOC serves to support field operations and liaison with all public and private disaster response agencies at all levels of government. The EOC is activated in response to major events and disasters that are beyond the scope of normal day-to-day emergencies. The EOC also serves as one of the central points for activating the U.S. Emergency Alert System for broadcasting emergency information to residents and the VC Notification Alert system in Ventura County.

The Simi Valley Emergency Services Program plans for, responds to, and coordinates the recovery from disasters. The program fulfills the following five major objectives: Emergency Planning, Emergency Management Training, Coordination for Emergency Response and Planning, Disaster Recovery, and Public Education. The City also partners with a number of organizations in the response to disasters, including the Simi Valley Unified School District, the VCFD, Southern California Edison, Simi Valley Hospital, Ventura County and California Offices of Emergency Services, Southern California Gas

[9] City of Simi Valley, General Plan EIR, Chapter 4 (Section 4.8-Hazards and Hazardous Materials), June 2012.

Company, American Red Cross, California Highway Patrol, Caltrans, and the Federal Emergency Management Agency (FEMA).

Additionally, the City implements the Community Emergency Response Training (known as CERT) program, which is designed to provide residents and businesses with skills to become self-reliant and to assist others during disasters. Volunteers are trained in a variety of emergency response skills conducted by the VCFD in conjunction with the Simi Valley OES.[10]

# Regulatory Setting

## *Federal*

### Federal Wildland Fire Management Policy

The 1995 Federal Wildland Fire Management Report was created by the Secretaries of the Interior and Agriculture to establish uniform federal policies regarding the management of wildland fire, triggered by the events of the 1994 wildfire season. Goals of the 1995 Federal Wildland Fire Management Report included protection of human life, proper reintroduction of wildland fire as a critical natural process, and cooperative wildland fire management. The 1995 Federal Wildlife Fire Management Report recognized the importance of fire processes in maintaining natural systems and created a strategy for planning, implementing and monitoring of wildland fire management activities at the federal level.11

The Review and Update of the 1995 Federal Wildland Fire Management Policy was completed in January 2001 and recommended selected changes to clarify purpose and intent of issues not fully covered in 1995, such as the fire hazard situation in the WUI is more complex than understood in 1995 and emphasis on program management at senior levels of federal agencies is critical for successful implementation of the plan. The 2001 Review and Update found federal fire management activities and programs to provide for firefighter and public safety, protect and enhance land management objectives and human welfare, integrate programs and disciplines, require interagency collaboration, emphasize the natural ecological role of fire and contribute to ecosystem sustainability.[12] In 2003, the Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy was developed to set forth direction for consistent implementation of the federal fire policy. In 2009, the Guidance for Implementation of Federal Wildland Fire Management Policy replaced the 2003 document as the primary guidance for federal agency implementation strategies.[13]

### National Fire Plan

The National Fire Plan is a 2000 Presidential Directive that was passed as a response to severe wildland fires that burned throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural communities and assuring sufficient firefighting capacity in the future. The plan is a long-term commitment based on cooperation and communication among federal agencies, state and local governments, tribes, and interested public entities. There are five key areas addressed under the National Fire Plan, including firefighting and preparedness, rehabilitation and restoration, hazardous fuels reduction, community assistance, and accountability.[14]

[10] Ibid.
[11] U.S. Department of Agriculture and U.S. Department of the Interior, Federal Wildland Fire Management Final Report, December 18, 1995.
[12] U.S. Department of Agriculture and U.S. Department of the Interior, Review and Update of the 1995 Federal Wildland Fire Management Final Report, January 2001.
[13] U.S. Department of Agriculture and U.S. Department of the Interior, Guidance for Implementation of Federal Wildland Fire Management Policy, February 13, 2009.
[14] Forests and Rangelands, Previous Wildfire Fire Management Initiatives, National Fire Plan, Accessed on September 28, 2022 at: https://www.forestsandrangelands.gov/resources/overview/.

### Healthy Forest Restoration Act

The Healthy Forest Restoration Act (HFRA) established a protocol for the creation of a document – a Community Wildfire Protection Plan (CWPP) that articulates a wildfire safety plan for communities at risk from wildland fires.

## *State*

### California Strategic Fire Plan

The California Strategic Fire Plan (2018) was developed in conjunction between the State Board of Forestry and Fire Protection (the Board) and CAL FIRE. In 2018, the Board adopted a new strategic fire plan to address fire prevention and natural resource management to maintain the state's forest as a resilient carbon sink to meet California's climate change goals and serve as important habitat for adaption and mitigation. The Board has adopted these Plans since the 1930s and periodically updates them to reflect current and anticipated needs as the environmental, social and economic landscape of California's wildlands changes over time. The 2018 Strategic Fire Plan emphasized the continued collaboration between local, state, federal, tribe and private partners to effectively manage a fire resilient WUI and natural environment.

The goals that are critical to achieving the 2018 Strategic Fire Plan's vision around fire prevention, natural resource management and fire suppression efforts include:[15]

- "Improve the availability and use of consistent, shared information on hazard and risk assessment;
- Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities;
- Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans;
- Increase awareness and actions to improve fire resistance of man-made assets at risk and fire resilience of wildland environments through natural resource management;
- Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers;
- Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services; and
- Implement needed assessments and actions for post-fire protection and recovery."

### Government Code Section 51182

Once the project is annexed to the City, Government Code 51182 applies. This regulation sets fire-safety requirements for any person who owns, leases, controls, operates, or maintains an occupied dwelling or occupied structure in, upon, or adjoining a mountainous area, forest-covered land, shrub-covered land, grass-covered land, or land that is covered with flammable material, which area or land is within a VHFHSZ designated by the local agency pursuant to Government Code Section 51179. The fire-safety requirements include defensible space and fuel modification requirements.

[15] State Board of Forestry and Fire Protection, California Department of Forestry and Fire Protection, 2018 Strategic Fire Plan for California, August 22, 2018.

### Public Resources Code 4290 & 14 California Code of Regulations Section 1270, et seq. (State Minimum Fire Safe Regulations

This portion of the Public Resources Code provides that the State Board of Fire Services must adopt regulations implementing minimum fire safety standards related to defensible space that are applicable to SRA lands under the authority of the department, and to lands classified and designated as VHFHSZ. The State Board of Fire Services is an 18-member advisory board to the California State Fire Marshal, and is comprised of representatives of fire service labor, fire chiefs, fire districts, volunteer firefighters, city and county government, Office of Emergency Services, and the insurance industry. The "State Minimum Fire Safe Regulations" (14 Cal. Code Regs. section 1270, et seq.) was promulgated for the purpose of establishing state minimum wildfire protection standards in conjunction with building, construction, and development in SRAs and VHFHSZs. These regulations provide for basic emergency access and perimeter wildfire protection measures, as well as standards for emergency access; signing and building numbering; private water supply reserves for emergency fire use; vegetation modification, fuel breaks, greenbelts, and measures to preserve undeveloped ridgelines.

### Health and Safety Code

State fire regulations set forth in Health and Safety Code Sections 13000, et seq. include regulations for building standards (as also set forth in the CBSC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

### California Fire Code

The California Fire Code contains regulations relating to construction and maintenance of buildings and the use of premises based on portions of the International Fire Code. Topics addressed in the code include, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist first responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and premises. The code contains specialized technical regulations related to fire and life safety. State Fire Code Chapter 49 addresses wildfire safety measures. The chapter includes mitigation strategies to reduce the hazards of fire originating within a structure spreading to wildland, as well as fire originating in wildland spreading to structures. These strategies are included in the following requirements: development of FPPs, development of landscape plans and long-term vegetation management, and creation and maintenance of defensible space to protect structures and subdivisions.

### California Building Standards Code

The CBSC contains multiples chapters which address fire safety:

#### *Chapter 7, Fire and Smoke Protection Features*

Chapter 7 regulates materials, systems and assemblies used for structural fire resistance and fire-resistance-rated construction separation of adjacent spaces to safeguard against the spread of fire and smoke within a building and the spread of fire to or from buildings. Chapter 7 applies to all permitted structures.

#### *Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure*

Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within SRAs or any Wildland-Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic

reduction in conflagration losses. Chapter 7A applies to new buildings located within a Wildland-Urban Interface Fire Area, which includes those within an LRA VHFHSZ. The proposed project is located within a VHFHSZ and therefore will be required to meet the ignition-resistant construction standards of Chapter 7A.

### *California Energy Code*

The California Energy Code contains the regulations for conservation requirements for the construction of new buildings. The CEC is responsible for setting performance standards that allow for an energy budget. This allows builders to comply with these standards using different methods to meet performance standards.[16] Water conservation is important in that it allows for water to be available when needed for firefighting.

## *Regional and Local*

### Ventura County Fire Protection District Unit Strategic Fire Plan

The Ventura County Fire Protection District Unit Strategic Fire Plan (2023) is a component of the California Strategic Fire Plan used within the VCFD and established under the HFRA protocol. The VCFD seeks to achieve the same goals as the State Plan for a natural environment that is more fire resilient, buildings and infrastructure that are more fire-resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire, on a local level that works with stakeholders and cooperators to create programs, policies, and procedures that would make the residents of Ventura County safer. Another significant element of the plan is to identify and evaluate wildland fire hazards to minimize negative effects of a wildland fire on the natural and human environments.[17]

### Ventura County Community Wildfire Protection Plan (2023)

The Ventura County CWPP was established under the HFRA protocol in collaboration with local, county, state and federal agencies as well as various community organizations within the County. The CWPP identified wildfire risks and clarifies priorities for funding and programs to reduce impacts of wildfire on the communities at risk within Ventura County.[18]

### Ventura County Fire Protection District Ordinance No. 29

Ordinance No. 29 of the VCFD to be known as the Ventura County Fire Apparatus Access Code, establishes the minimum cumulative design and maintenance standards for emergency fire access roads within the jurisdictional boundaries of the VCFD. These provisions permit emergency resources to response to an incident in a safe and effective manner.[19]

### Wildland Fire Action Plan

The Fire Hazard Reduction Program (FHRP) is the cornerstone of the VCFD Wildland Fire Action Plan. The Wildland Fire Action Plan provides guidance to homeowners against wildfires by maintaining property free of fire hazards or nuisance vegetation year-round and compliance with clearance requirements. Property owners included in the program receive an annual Notice to Abate Fire Hazard and required to undergo inspection to ensure compliance.[20]

[16] California Energy Commission, 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, For the 2019 Building Energy Efficiency Standards.
[17] Ventura County Fire Protection District, Unit Strategic Fire Plan, May 2023.
[18] Ojai Valley Fire Safe Council, Ventura County Community Wildfire Protection Plan, March 9, 2010.
[19] Ventura County Fire Protection District Ordinance No. 29, Accessed on September 21, 2022 at: https://vcfd.org/wp-content/uploads/2020/02/Ordinance-29-Adopted-Version-1.pdf
[20] Ventura County Fire District, Ready Set Go! Your Personal Wildfire Action Plan, 2013.

### Simi Valley Multi-Jurisdictional Hazard Mitigation Plan

The City is required to adopt and state and federally approved Multi-Hazard Mitigation Plan under the regulations of the Disaster Mitigation Act of 2000. The overall intent of the Plan is to be a strategic planning tool for the reduction or prevention of injury and damage from hazards in Simi Valley. The City joined with Ventura County for the 2022 Multi-Jurisdictional Hazard Mitigation Plan (HMP) update. The plan documents the community's known natural hazards, capabilities, and vulnerabilities and identifies strategies to overcome those vulnerabilities.

### Simi Valley Municipal Code

#### *Chapter 4-5 (Emergency Preparedness)*

SVMC Chapter 4-5 regulates the preparation and carrying out of plans for the protection of persons and property within the jurisdiction of the City, Districts, Agency, and Authority in the event of an emergency: the direction of the Emergency Organization; and the coordination of the emergency functions of the City with all other public agencies, corporations, organizations, and affected private persons.

#### *SVMC Chapter 8-18 (Simi Valley Building Code)*

SVMC Title 8, Chapter 18 adopts the 2022 California Building Standards Code as the Primary Existing Building Code of the City.

## 4.16.2 Thresholds of Significance

The potential wildfire impacts of the project have been analyzed in relation to the following threshold criteria, which are based upon the state CEQA Guidelines Appendix G Checklist. The proposed project would be considered to have a significant impact with regard to wildfire if located in or near SRAs or lands classified as VHFHSZ and the project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan. ***(Substantially Impair Emergency Response or Evacuation Plan)***
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. ***(Pollutant Concentrations from Wildfires)***
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. ***(Installation or Maintenance of Wildfire Associated Infrastructure)***
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. ***(Post Wildfire Indirect Impacts)***

## 4.16.3 Project Impacts and Mitigation Measures

The North Canyon Ranch project applicant proposes to construct a residential development within a project site to be annexed to the City. Although there is existing urban development to the east and south, the site is within a VHFHSZ and the project would be on the WUI, and thus of concern for wildfires.

In addition to continuing an urban pattern of development adjacent on two sides, several aspects of the proposed project that serve to reduce fire impacts, include its location, which would be within 0.3 miles of the closest fire station (Station #47). The project will also complete the extension of Falcon Street from

Erringer Road to Falcon Street to improve area circulation and provide the site with two points of access. Also, the design would retain an access route for VCFD vehicles to enter through the proposed Falcon street extension to provide fire break maintenance or wildland fire fighting services if needed. In the case of a wildland fire, CAL FIRE would also send resources to suppress the fires in the area.[21] Additionally, development of the project would require VCFD review and approval of site plans for fire protection features including adequate fire apparatus access, roadway width, turnaround areas, adequate placement of hydrants with appropriate pressures to provide fire-flow for firefighting purposes, installation of sprinklers, and establishment of fuel modification zones for brush clearance adjacent to development. These features would be specified on project plans and specifically in the FPP and Fuel Modification Plan for the project site.

The proposed North Canyon Ranch Fuel Modification Plan map was reviewed and deemed acceptable to the VCFD. The map was developed based on analysis in the project-specific preliminary FPP for the North Canyon Ranch development, which was developed pursuant to Fire Code Chapter 49 (see Regulatory Setting) and was also reviewed and deemed acceptable to the VCFD. Together they are designed to minimize fire hazards and risks that may threaten life and property associated with the proposed residential development. In addition, the preliminary FPP establishes both short and long-term fuel modification actions to minimize any projected fire hazard and risk and assigns annual maintenance responsibilities for each of the recommended fuel modification actions. The FPP provides fuel treatment and construction feature direction for developers, architects, builders, the VCFD, and the individual lot owners to use in making the structures in the proposed project relatively safe from future wildfires.

The FPP study looked at historical fire data, weather station data, vegetation composition (i.e., as fuel for wildfires) considering aerial photography and Envicom's biological resources mapping (see Section 4.4, Biological Resources), in order to recommend fuel modification obligations for North Canyon Ranch. The preparers of the FPP used the "BehavePlus 6.0.0 Fire Behavior Prediction Model" developed by USDA–Forest Service to make the fire behavior assessments. Flame length was modeled for various wind direction scenarios using worst case assumptions for: high winds, fuels, fuel moisture, and topography. This analysis allows for fuel modification zones to be established to avoid direct contact of wildfire flames with structures. In addition to fuel-burning flame length, the FPP study evaluated potential structure ignitions the occur from three wildfire sources: convective firebrands (flying embers), direct flame impingement, and radiant heat. In order to minimize wildfire issues occurrence or exacerbation which may cause a significant impact to fire services that may result in the need for new or physically altered governmental facilities, the FPP provides detailed specifications for the Fuel Modification Zones shown on the map, and additional construction and landscaping requirements such as appropriate vegetation usage and list of VCFD prohibited plant list. Recommended Construction Standards include preconstruction inspection of water and power infrastructure, operable windows, interior sprinklers, and building materials specifications. Fire Infrastructure requirements include water availability with sufficient fire flow (i.e., sufficient volume and pressure for firefighting), hydrants, as well as specifications for privacy gates, should they be installed, and labeled fire access roads and gates. Homeowner Education recommendations include the developer providing a copy of the final North Canyon Ranch Final Fire Protection Plan, including the Fuel Modification Plan map to residents and the Homeowner's Association (HOA). The HOA is to ensure continued compliance with all Fuel Modification maintenance and construction requirements, as monitored by the VCFD, and comply with the Mandated Inclusions in the HOA and Lot Owner Covenants, Conditions, and Restrictions (CC&Rs).

[21] As confirmed by VCFD review (Corina Cagley and Larry Williams), October 2023.

### *4.16.3.1 Substantially Impair Emergency Response or Evacuation Plan*

A significant impact may occur if the proposed project were to substantially impair an adopted emergency response plan or emergency evacuation plan.

## *North Canyon Ranch*

As stated in the Regulatory Setting, the County of Ventura and the City both implement programs to facilitate emergency preparedness. Specifically, the County of Ventura's OES administers the County's disaster preparedness and response program and development of the County's Emergency Response Plan. The EOC is the coordination point between the cities, special districts and the State OES, and serves to support field operations and liaison with all public and private disaster response agencies at all levels of government. In addition, the City plans for, responds to, and coordinates the recovery from disasters in coordination with multiple organizations. The City implements the CERT program, which is designed to provide residents and businesses with skills to become self-reliant and to assist others during disasters. Volunteers are trained in a variety of emergency response skills conducted by the VCFD in conjunction with the Simi Valley OES. The project would be required to comply with all applicable regulations outlined in the disaster preparedness and emergency plans to ensure emergency preparedness and response. City residents are kept aware through the U.S. Emergency Alert System for broadcasting emergency information to residents and the VC Notification Alert system in Ventura County.

As discussed in Section 4.12, Public Services – Fire and Ambulance Services, the project site is served by the VCFD with the closest station, Fire Station #47, just 0.3 miles away on Erringer Road. The project site would comply with all regulations and design review requirements of the City and VCFD and is located within close proximity to an existing fire station, which would allow for adequate emergency preparedness and disaster response. Construction of the proposed residences would increase demand for fire protection and emergency services. However, the project is located in close proximity to an existing VCFD fire station and VCFD resources; would be required to provide final development plans for review and approval by VCFD to ensure regulatory compliance; and would incorporate project features per the VCFD, which would require a project-specific final FPP, pursuant to Chapter 49 of the CFC. As noted earlier, a proposed Fuel Modification Plan map and preliminary FPP have been reviewed and deemed acceptable to the VCFD. The Final FPP will be developed once the Tract Map is approved and structure foundation footprints, driveway locations and landscape plan are further finalized.

During construction, the proposed project would not result in total closure of any roadways, and thus any temporary construction impact to emergency evacuation would be reduced. Partial closures, if needed for short periods of time, such as for trucks exporting soil and delivering materials, would be temporary. Partial closure would require a construction traffic management plan to be approved by the City, which may include flag persons and signage to assure traffic flow and safety. Other alternate routes to exit the surrounding area are available through other local streets. As such the project would not substantially impair or physically interfere with the ability of emergency vehicles to respond to emergencies within the vicinity of the site.

In addition, the most accessible regional emergency access route would be the SR-118, located just south of the project site. During operations, the project would not interfere with movement of emergency vehicles on the existing local street network or the SR-118. The project will provide a critical City road network connection by building Falcon Street to connect Erringer Road and First Street, which will facilitate emergency access and evacuation of the site and surrounding areas beyond the site. As such, the project would not directly impair an adopted emergency response plan. However, as development in a VHFHSZ and WUI is of particular concern for wildfires, a Final FPP will be required, as stated in mitigation measure FIRE-1, in Section 4.12.1, Fire and Ambulance Services. With regulatory compliance

and project features noted above, and with mitigation measure FIRE-1, the project's potential wildfire impacts and indirect potential impacts on emergency response to wildfires would be reduced to less than significant.

### *Required Island Annexations*

The Islands are located within existing developments and include parcels that are mostly developed for residential use with single-family homes or duplexes. A total of five undeveloped lots within these unincorporated areas could potentially be developed with five dwelling units. For the purposes of CEQA, the only action for this part of the project is for the City to annex these properties, and no physical changes in land use or infrastructure within these properties is proposed. As such, the project would not cause substantial development or population growth due to the Required Island Annexations. Additionally, the five vacant lots within these areas could potentially be developed with five homes in the future with or without implementation of the rest of this project if they remained within County jurisdiction. The annexation of the Islands would therefore not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, the potential impacts of the Islands Annexations regarding emergency response would be less than significant.

### *Mitigation Measures*

In addition to regulatory compliance and project features, mitigation measure FIRE-1 is required.

### *Residual Impacts*

With implementation of mitigation measure FIRE-1, which is designed to assure adherence with all aspects of the North Canyon Ranch Final FPP, the project's potential wildfire impacts and indirect potential impacts on emergency response to wildfires would be reduced to less than significant. No development or physical changes would occur in the Islands, and thus no impact would occur there.

## *4.16.3.2 Pollutant Concentrations from Wildfires*

The proposed project may have a significant impact if due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. As detailed in the Environmental Setting Section above, generally, there are three major factors that sustain wildfires and allow for predictions of a given area's potential to burn, fuel, topography, and weather. All three factors are present in Simi Valley. In addition to a generally dry climate and periodic droughts, wind is a factor in the spread of wildfires. For the City, for most of the year the wind is predominantly from the north (for 7.0 months, from September 25 to April 25), with a peak percentage of 56 percent on January 1. The wind direction for the rest of the year (5.0 months, from April 25 to September 25) is most often from the west for with a peak percentage of 48 percent on June 2.[22] Fires at the base of a slope spread more readily and quickly upslope; downslope spreading is still possible, but fires generally move more quickly uphill than downhill or on flat terrain.[23] Most wildfires are caused by human activity, either directly or by indirect means such as a downed electrical line. Considering human causation and the slopes and prevailing winds, based on the location of North Canyon Ranch and the Required Annexation Islands that are adjacent to – or at – the WUI (i.e.,

[22] Weatherspark Website, Accessed October 20, 2022 at: https://weatherspark.com/y/1731/Average-Weather-in-Simi-Valley-California-United-States-Year-Round#Sections-Wind

[23] National Park Service, Wildland Fire Behavior, Accessed October 20, 2022 at: https://www.nps.gov/articles/wildland-fire-behavior.htm#:~:text=It%20will%20typically%20move%20more,or%20than%20on%20flat%20terrain.&text=Topography%20describes%20land%20shape.

Islands 1, 2, 3, 5 and 6), there is a potential for human activity in the project site locations to cause a wildfire.

## *North Canyon Ranch*

The proposed project is located within a VHFHSZ as mapped by CAL FIRE pursuant to state law and based on fuels, terrain, weather, and other factors. The FHSZs influence how people are permitted construct buildings and protect property to reduce risk associated with wildland fires. As stated above, the VCFD's Wildland Fire Division, within the Bureau of Support Services sustains a long-term plan of maintaining a patchwork of modified fuel beds to control historical wildland fires that provide control zones for assets of value and range improvement.

The project site would be graded according to the approved grading plan providing large, level building lots and manufactured slopes that would be designed, drained and landscaped meet County standards and resist failure, siltation and excessive runoff. The project proposes 207 residential units, placed throughout the site in a logical pattern, such that the design would not introduce elements that would capture and funnel prevailing winds in a manner that would substantially exacerbate wildfire risks and/or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The roads, building lots and graded and maintained areas of the site will act as local fire breaks and the ultimate fire water (flow and pressure) and hydrants will provide and facilitate access to water for use in fire suppression. There is also an existing fuel modification/reduction zone along the eastern boundary, which protects the neighboring residential development, and the project will be required to provide a fuel modification zone to serve as a fuel break.

In addition, the North Canyon Ranch Tentative Tract Map (TTM) has undergone VCFD design review and preliminary review by the City as part of the project application, in anticipation of the annexation. Several revisions of the TTM have during this review have occurred before this Draft EIR, which have reduced the extent of the project development footprint within the WUI, reduced units, and incorporated fire-safety requirements. Formal City review will occur once the LAFCo annexation is complete. The map design and conditions to be applied will assure the plans incorporate fire safety features as required by the VCFD and SVMC, including the requirement for sprinklers in new buildings, design accommodations for fire apparatus access, fire-safe landscaping specifications, project-specific defensible space, and fuel approved modification zones. Given the location of the project site in a VHFHSZ and WUI, the TTM design features, final FPP and Fuel Modification Plan essential for avoiding an exacerbation of wildfire potential at or spreading from the project site. These fire-reduction features and conditions will reduce the potential for project-related wildfire-generated hazardous pollutant concentrations that result in unhealthful air quality within the region, as described in Regulatory Setting, above.

In addition to local regulations, the project must comply with State Minimum Fire Safe Regulations (14 Cal. Code of Regs. section 1270), governing access a multitude of fire safe issues, including fire hydrants, road design, building siting, setbacks and fuel modification (i.e., thinning or clearance near structures), including building setbacks from property lines. In general, 30 feet building setbacks will be required from all property lines and/or the center of a road, with specific exceptions allowable with review and approval of the VCFD. Exceptions may include topographic limitations, sensitive habitat, or development density or patters that promote low-carbon emission outcomes, and where exceptions are made, alternate features to reduce structure to structure ignition potential will be required by the VCFD through the plan review process. Pursuant to CFC Chapter 49, a project-specific final Fire Protection Plan for the North Canyon Ranch project must be reviewed and approved by the VCFD, which will specify a program of fire safe measures required for the project.

The buildings would also conform to Chapters 7, 7A, and 9 of the CBSC, which regulate building materials, structural design as it relates to fire containment, safety features, and fire sprinkler systems. CFC Chapter 7A requirements harden the structure against wildfires, but also serve to further reduce the likelihood of the development burning out of control. CFC Chapter 7A compliant features include a class A roof assembly with no eaves or soffit venting, which would allow combustible embers to enter. The flat non-combustible roof and vertical non-combustible cladding on the exterior walls, constructed of a combination of cement plaster and fiber cement panels present a fireproof shell to the exterior with no system venting to allow burning embers inside. Additionally, the project would comply with the standard Building Energy Efficiency Standards, which requires Minimum Efficiency Reporting Value (MERV) 13 requirements or equivalent air filters for new development. MERV 13 filters are the highest rated filters that the HVAC system can accommodate and can improve the systems efficient in removing particulates and are required for all residential and industrial structures. As such, the project would implement regulatory requirements specifically provided for high fire hazard areas to ensure the project would not exacerbate wildfire risk, and therefore exposing project occupants to pollutant concentrations from wildfire. To assure implementation of all TTM design features and conditions of approval all features the project will be reviewed and approved by the VCFD during plan check, prior to issuance of building permits, and during construction, to assure all TTM design features and conditions are appropriately implemented.

As discussed above and in Section 4.12, Public Services – Fire and Ambulance Services, the project site is served by the VCFD with the closest station, Fire Station #47, just 0.3 miles away on Erringer Road. As the project site would comply with all regulations required by the VCFD (including design and defensible space requirements with appropriate building setbacks and fuel modification zones), would incorporate all required TTM design features and conditions, and is located within close proximity to an existing fire station.

The project's potential to impact or exacerbate impacts of pollutant emissions from fires considering slopes, prevailing winds, and other factors, would be less than significant.

## *Required Island Annexations*

These Islands are located within existing developed areas and include parcels that are mostly developed for residential use with single-family homes or duplexes. A total of five undeveloped lots within these unincorporated areas could potentially be developed with five dwelling units. For the purposes of CEQA, the only action for this part of the project is for the City to annex these properties, and no physical changes in land use or infrastructure within these properties is proposed. The project would not cause substantial development or population growth due to the Islands. Additionally, the five vacant lots within these areas could potentially be developed with five homes in the future with or without implementation of the rest of this project if they remained within County jurisdiction. The future annexations would not necessarily exacerbate wildfire risks through potential additional development, as infill is determined by the state to be preferable to development into the wildland-urban interface. Infill in generally developed areas with fire-fighting infrastructure has less impact on wildfires than other development. Further, the potential minor increase in future development would not contribute to substantial growth and would result in a less than significant impact related to exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the potential impacts of the Islands Annexations regarding wildfire would be less than significant.

## *Mitigation Measures*

No mitigation is required.

### *Residual Impacts*

Impacts would be less than significant before mitigation.

## *4.16.3.3 Installation or Maintenance of Wildfire Associated Infrastructure*

The proposed project may have a significant impact if it would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

### *North Canyon Ranch*

The project would require the installation of roads, power lines, water storage tanks and other utilities typical of any residential and light industrial development. As discussed in **Section 4.15, Utilities and Service Systems**, the project would result in less than significant impacts related to the construction of new or expanded water, wastewater treatment storm water draining, electric power, natural gas or telecommunications facilities. The infrastructure added for project use would be to the latest design requirements of the utility provider and the City, unlike older development in other parts of California that may be more susceptible to failure or breakage, such as older power lines that have sometimes been the cause of wildfires. Beyond the provision of service to the site, the project would not require additional emergency facilities related to the provision of water, power lines or other utilities.

The project would provide local public streets to serve the project site, and private drives and fire lanes for adequate vehicular and fire access. All proposed roads will also be constructed to applicable local, county, state and federal fire codes regulations, and the new roads would act as additional fire breaks and facilitate access for emergency responders. As such, the construction of the project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment due to the installation or maintenance of associated infrastructure, and with regulatory compliance impacts would be less than significant.

### *Required Island Annexations*

These Islands are located within existing developed areas within the unincorporated portion of Ventura County and include parcels that are mostly developed for residential use with single-family homes or duplexes. A total of five undeveloped lots within these unincorporated areas could potentially be developed with five dwelling units. For the purposes of CEQA, the only action for this part of the project is for the City to annex these properties, and no physical changes in land use or infrastructure within these properties is proposed. The project would not cause substantial development or population growth due to the Island Annexations. Additionally, the five vacant lots within these areas could potentially be developed with five homes in the future with or without implementation of the rest of this project if they remained within County jurisdiction. The future development of these lots may require localized installation or maintenance of associated infrastructure through potential additional development; however, such infrastructure has yet to be designed and like development of the five lots, the timing is unknow. The potential minor increase in future development would not contribute to substantial growth or infrastructure development. If any larger infrastructure changes are proposed in the future within the Islands, they would be reviewed by the City to determine if CEQA evaluation is required. Therefore, based on the lack of plans for any substantive increase in infrastructure at this time, the Islands Annexations with regarding exacerbation of fire risk or temporary or ongoing impacts to the environment due to the installation or maintenance of associated infrastructure wildfire would be less than significant.

## *Mitigation Measures*

No mitigation is required.

## *Residual Impacts*

Impacts would be less than significant before mitigation.

### *4.16.3.4 Post Wildfire Indirect Impacts*

The proposed project may have a significant if it would expose people or structures to significant risks, including downslope or downstream impact flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

## *North Canyon Ranch*

Previously modified areas within the project site include artificial slopes with concrete terrace drains, and two debris basins, which avoid substantial onsite erosion and protect urban areas to the south from stormwater and debris flows. The project site contains a series of ditches and swales, which help to convey stormwater flows from undisturbed northern portions of the watershed to the two existing temporary detention ponds in the southern portion of the site. The two temporary detention ponds currently intercept and capture stormwater flows from the site's sub-basins. The western pond collects runoff from the western sub-drain, while the eastern pond collects runoff from the central and eastern sub-drains. These detention ponds would be retained and improved as part of the project, and would remain in place and operable throughout construction, retaining runoff within the site, which would trap sediment and potentially other pollutants before being released offsite to the existing storm drain system.

As described in Section 4.8, Hydrology and Water Quality, the project would be required to submit a Storm Water Pollution Prevention Plan (SWPPP) for approval by the City and the Los Angeles Regional Water Quality Control Board (LARWQCB). The SWPPP will reference Best Management Practices (BMP's) to be implemented during the construction process to minimize erosion and sedimentation, as well as impacts of other construction-related pollutants. The submittal of the SWPPP to the LARWQCB shall be memorialized by a Notice of Intent, to be included in the SWPPP, and the issuance of a Waste Discharge Identification Number from the state. The SWPPP must be accompanied by an Erosion and Sediment Control Plan that will indicate the general locations where the required BMP's will be employed, as well as staging areas where materials with the potential to pollute stormwater would be stored and provided secondary containment such as a berm. Throughout construction, the developer would be required to have the site inspected to insure that BMPs are adequate and maintained in compliance with SWPPP conditions to further ensure flooding and erosion does not occur on-site.

During operations, the project would be required to comply with the MS4 Permit for Ventura County, which requires the project to capture, treat, retain and infiltrate runoff from storm events in which stormwater runoff will be limited to five percent (5%) of the site's effective impervious area. The project design has incorporated improvements to the western detention pond to accommodate and infiltrate runoff by placement of gravel and sand under 14,300 square feet of the basin bottom to allow for bio-infiltration of runoff, which would exceed the calculated infiltration area necessary to ensure compliance with the MS4 Permit conditions.

In addition, there are no special flood hazard areas mapped within the project site based on a review of the FEMA Flood Insurance Rate Map (FIRM) Panel Number 06111C0842E (January 20, 2010). The project design will include flood control infrastructure adhering to the latest County design standards and codes, and the Department of Public Works' grading plan review will examine whether the project plans include

appropriate grades, benching, subdrains, planting for slope stability and other design standards for onsite manufactured slopes in order to assure slope stability and reduce erosion, which has the potential to affect wildfire susceptibility. These regulatory compliant features would reduce potential stormwater and erosion impacts under both normal and post-fire conditions. As the project would comply with the SWPPP and MS4 requirements, including BMPs to treat, retain and infiltrate stormwater to minimize flooding and erosion as a result of runoff, post-fire slope instability or drainage changes. As such, impacts would be less than significant.

### *Required Island Annexations*

The Islands are located within existing developed areas and include parcels that are mostly developed for residential use with single-family homes or duplexes. A total of five undeveloped lots within these unincorporated areas could potentially be developed with five dwelling units. For the purposes of CEQA, the only action for this part of the project is for the City to annex these properties, and no physical changes in land use or infrastructure within these properties is proposed. As such, the project would not cause substantial development or population growth due to the Island Annexations. Additionally, the five vacant lots within these areas could potentially be developed with five homes in the future with or without implementation of the rest of this project if they remained within County jurisdiction. No plans for these lots are known at this time; however, development of the lots would be subject to regulations and City plan review individual project designs including grading and drainage plans that would ensure adequate slope stability and reduce erosion under both normal and post-fire conditions. Further, the potential minor increase in future development would not contribute to substantial growth. As such, the minor potential development of five lots would result in a less than significant impact related to post wildfire indirect impacts. Therefore, the potential impacts of the Islands Annexations would be less than significant wildfire impacts with regard to exposure of people or structures to significant risks, including downslope or downstream impact flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

### *Mitigation Measures*

No mitigation is required.

### *Residual Impacts*

Impacts would be less than significant before mitigation.

## 4.16.4 Cumulative Impacts

## North Canyon Ranch

Under CEQA, a project's impact is cumulatively considerable when the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Chapter 3.0, Cumulative Projects, provides a list of recent, currently proposed and reasonably foreseeable projects in the City, as a subset of General Plan buildout. With regard to an adopted emergency response plan or emergency evacuation plan, the project and related project direct impacts would be reduced by provision of a critical City road network connection by building Falcon Street to connect Erringer Road and First Street, which will facilitate emergency access and evacuation of the site and surrounding areas beyond the site, and regulatory compliance to ensure the project would not interfere with emergency vehicles or access routes. For indirect impacts, the provision of mitigation requiring the final FPP and Fuel Modification (mitigation measure FIRE-1) will assure that project indirect impacts to emergency response of evacuation would not contribute to a significant impact and cumulative impacts would be less than significant.

With regard to pollutant concentrations from wildfires, project and related project sites would be reduces through individual project design and regulatory compliance (e.g., adequate access, fire flow and volume, fire hydrants, building sprinklers, defensible space), as well as compliance with County plans and procedures. Regarding installation of wildfire associated infrastructure, the project and related project site impacts would be reduced by incorporating the latest design requirements of the utility provider and the City, and provision of local public streets to serve the project site, and private drives and fire lanes for adequate vehicular and fire access. Regarding post wildfire indirect impacts, the project and related project sites would be reduced by regulatory compliance with the SWPPP during construction and MS4 Permit during operations. Overall, as the proposed project design would comply with regulatory requirements and undergo VCFD review and approval including adoption of a project-specific final Fire Protection Plan, project impacts would be reduced to less than significant, and would not be cumulatively considerable. Other projects in the area would be similarly subject to regulatory compliance and review, and therefore cumulative impacts related to wildfire would be less than significant.

## Required Island Annexations

These unincorporated areas are located adjacent to existing development and include parcels that are mostly developed for residential use with single-family homes or duplexes. A total of five undeveloped lots within these unincorporated areas could potentially be developed with five dwelling units. For the purposes of CEQA, the only action for this part of the project is for LAFCo to approve annexation of the Island properties to the City, and no physical changes in land use or infrastructure within these properties is proposed as part of this project. As evaluated above, the annexation of the Island Areas would not result in significant impacts related to wildfire. Therefore, the City's annexation of the Islands would not result in a cumulatively considerable contribution to wildfire, and cumulative impacts would be less than significant.

## Full Project

The combined impacts of all project components, with design features, TTM conditions and regulatory compliance that includes a project-specified final Fire Protection Plan to be reviewed and approved by the City and VCFD, would be less than significant for all aspects of CEQA wildfire impacts. No specific impacts of future projects related to wildfire are known at this time. Future projects in the City would also be assessed for potential impacts as part of the City's CEQA review process for projects. No significant cumulative impact would occur as a result of the project.