

4.20 WILDFIRE

The following setting and impact discussion is based, in part, on the *Dana Reserve Fire Protection Plan* (Resolute Associates 2021; EIR Appendix K), which includes an in-depth assessment of wildfire risks at the site and surrounding area and identifies wildfire prevention methods to minimize wildfire risks.

4.20.1 Existing Conditions

California experienced its most destructive and deadliest fires in 2018. Statewide, there were 1.8 million acres burned, 23,000 structures destroyed, 98 civilian lives lost, and six firefighter deaths. In San Luis Obispo County, there were 218 wildfires totaling 3,115 acres burned, 60 structure fires, and 65 vehicle fires (County of San Luis Obispo 2019a). Climate change has resulted in more variable and potentially extreme weather conditions that are drying vegetation at a faster rate and causing fire-adapted plant species to ignite (Resolute Associates 2021). In 2021, there were approximately 8,786 reported wildfires and approximately 2,568,941 acres burned in the state (CAL FIRE 2021c).

4.20.1.1 Nipomo Wildland Urban Interface

Urban fire hazards may be influenced by a variety of factors, including building location and construction characteristics, access constraints, the storage of flammable and hazardous materials, inadequate supply of fire suppression water, and response time for fire protection personnel. Fire-related hazards in rural areas are generally the result of development within hillsides or other densely vegetated areas. Development that occurs in wildlands and wildland-urban interface (WUI) areas would be exposed to wildfire hazard (County of San Luis Obispo 1999). The Specific Plan Area is located within a WUI area. According to the County's MJHMP, the NCSO has experienced five wildfire incidents from 1900 to 2018, including the Flintkote fire in 1957 that burned approximately 380 acres, the Willow Road fire in 1970 that burned approximately 392 acres, the Willow Road fire in 1976 that burned approximately 937 acres, the Slu-730 fire in 1987 that burned approximately 7,733 acres, and the Mesa fire in 1993 that burned approximately 345 acres (County of San Luis Obispo 2020).

CAL FIRE has assigned FHSZs to lands within the state using a science-based and field-tested model that assigns a hazard score based on factors that influence fire behavior. These factors include fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. Urban and wildland areas are treated differently in the model (CAL FIRE 2021a). Based on the number of parcels located within moderate and high fire FHSZs, it is estimated that 1,117 people and 478 parcels could be at risk of wildfire-related hazards. Of the 478 parcels at risk, four parcels are located in a moderate FHSZ, including two mobile/manufactured home parcels and two residential parcels. The remaining parcels are located in a high FHSZ and include two agricultural parcels, nine government/utility parcels, nine other/exempt/miscellaneous parcels, 410 residential parcels, five multi-family residential parcels, 26 mobile/manufactured home parcels, and 13 vacant parcels (County of San Luis Obispo 2020).

4.20.1.2 Specific Plan Area Wildfire Setting

There are three factors that influence wildfire behavior: weather, topography, and fuel. Typically, windy and dry weather create optimal conditions to facilitate the spread of wildfire by providing oxygen to fuel the fire and increasing the intensity of the fire (WorldAtlas 2018a). Weather in Nipomo is influenced by its proximity to the Pacific Ocean and is considered a coastal valley climate. While record temperatures in the Nipomo area are over 100°F, seasonal highs are around 80°F and seasonal lows are around 43°F. Nipomo has an average annual precipitation of approximately 17 inches and a historic average humidity in the low 60s. Outside of winter storms, wind conditions in Nipomo peak in both springtime and early

autumn, from the northwest to west–northwest. The average wind speed in Nipomo is approximately 10.4 mph and maximum wind speeds generally do not exceed 23 mph. Based on the CAL FIRE FHSZ viewer, the Specific Plan Area is located within a State Responsibility Area (SRA) in a high FHSZ (Figure 4.20-1).

Topography plays a role in determining the potential rate at which a wildfire can spread. Typically, in mountainous or hilly areas, wildfires tend to spread more quickly uphill compared to downhill (WorldAtlas 2018a). The Specific Plan Area consists of three parcels that total approximately 288 acres. The main project parcel (APN 091-301-073) is 274.4 acres in size and the remaining two parcels (APN 091-301-030 and APN 091-301-031), which connect to the northern portion of the main parcel, are approximately 7.7 acres and 7.2 acres in size, respectively. The main parcel (APN 091-301-073) is undeveloped with the exception of unpaved ranch roads traversing the site. There are dense oak woodlands and other trees and shrubs throughout the main parcel. APN 091-301-031 is undeveloped and supports grasslands and small, scattered trees, and APN 091-301-030 has existing development, including agricultural structures and unpaved roads, and is characterized by dense oak tree coverage over the entire parcel. Elevations at the Specific Plan Area range from approximately 355 to 400 feet amsl. The Specific Plan Area supports topography that consists of relatively flat areas and gently rolling hills.

The Specific Plan Area is surrounded by rural residential uses, Willow Road, and Cherokee Place to the north; residential development in the community of Nipomo to the south; residential development and Hetrick Avenue to the west; and US 101 to the east. Topography surrounding the project area is consistent with the Specific Plan Area and is relatively flat with gently rolling hills. There is steeply sloping land located approximately 2.5 miles east of the Specific Plan Area. Land located to the east and to the south of the Specific Plan Area is located within a local responsibility area (LRA) and is not designated a FHSZ by CAL FIRE. Land to the north and to the west of the Specific Plan Area is within an SRA in a high FHSZ (see Figure 4.20-1).

Ideal wildfire fuel includes vegetation with lower moisture content, such as grass, dead logs, and branches. Typically, living trees provide poor wildfire fuel due to the high moisture content, which slows the burning process (Resolute Associates 2021). Wildfire is less likely to spread in areas with dense forests due to canopy and shade contributing to lower temperatures and higher humidity. However, in the event of a wildfire, the density of vegetation cover can also encourage the spread of wildfire by providing fuel (WorldAtlas 2018a). The Specific Plan Area is mostly undeveloped and supports dense oak, chaparral, and grassland vegetation. A wildfire threat analysis was conducted for the Specific Plan Area based on average and extreme fire conditions. Average fire weather conditions are described as conditions at the site over 90% of the time (e.g., average wind speed, weather, humidity) and extreme weather conditions are described as conditions at the site over 10% of the time (e.g., storm conditions). Average and extreme fire weather conditions that are used in the wildfire threat analysis include wind speed and the percentage of fine dead fuel moisture, which is described as the response to the changes in humidity in the air. The average and extreme fire weather conditions were determined by analyzing weather data from 1992 to 2019 collected at the Arroyo Grande Remote Automatic Weather Station, located 8 miles northwest of the Specific Plan Area. Average fine dead fuel moisture conditions are 6%, which is fully capable of supporting wildfire conditions. The extreme conditions are 3%, which significantly increases the ability for wildfire to ignite. Average wind speed conditions are 4 mph. The maximum gust recorded was 39 mph on October 19, 2004 (Resolute Associates 2021). Based on these factors, fire behavior simulations were prepared for the Specific Plan Area using FlamMap, version 6.0, which is a fire behavior mapping and analysis software application developed by the U.S. Forest Service and the Missoula Fire Sciences Laboratory to compute potential fire behavior characteristics over an entire landscape. Table 4.20-1 summarizes the average and extreme wildfire conditions simulation results.

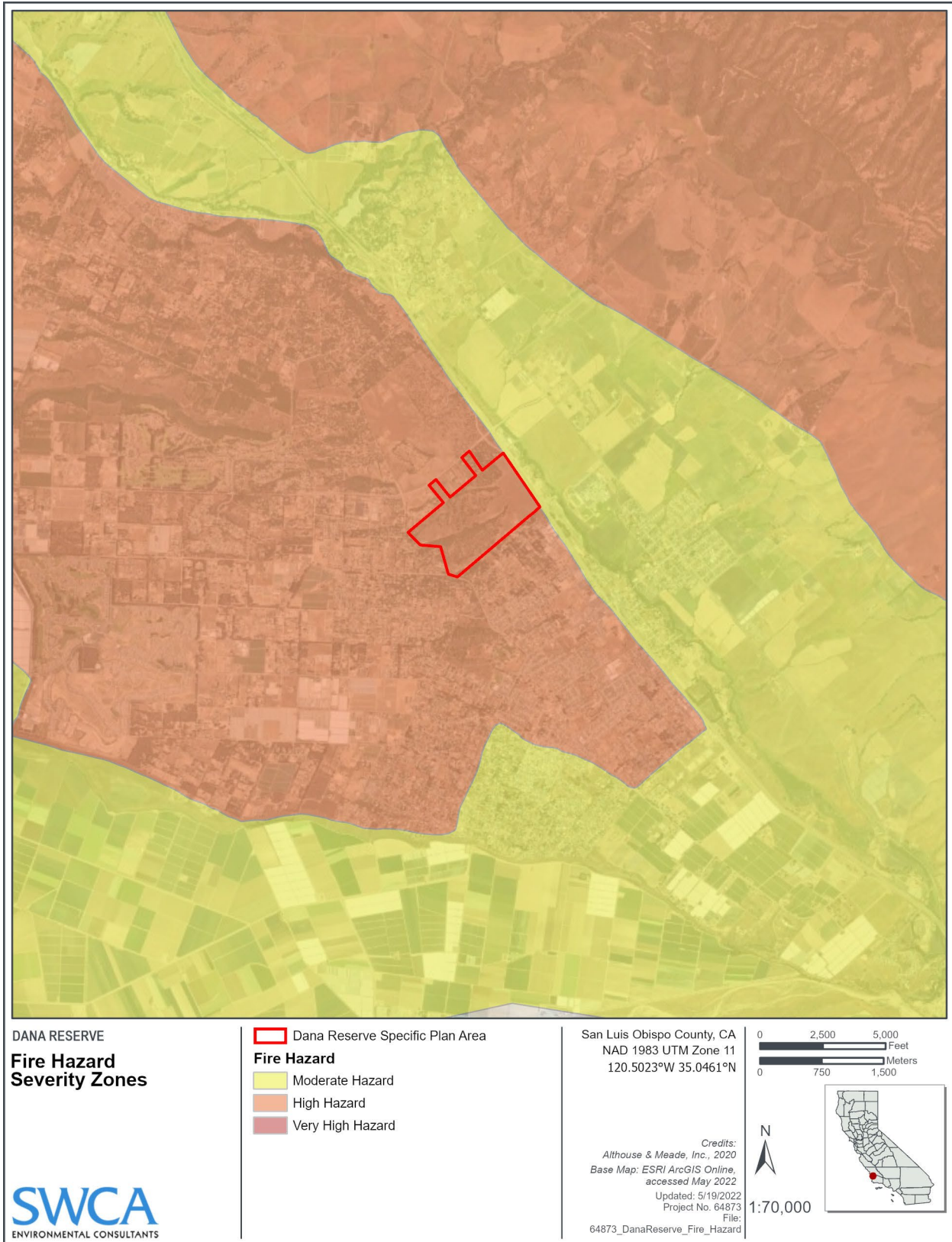


Figure 4.20-1. Fire hazard severity zone map.

Table 4.20-1. Average and Extreme Wildfire Conditions for the Specific Plan Area

Conditions	Wind Speed ¹	Fine Dead Fuel Moisture	Flame Length Results
Average	4 mph NW	6%	4 feet: Fire can generally be attacked at the head or flanks by persons using hand tools. Handline should hold the line.
Extreme (Above 90 th Percentile)	39 mph SE	3%	8 to 11 feet: Fires may present serious control problems such as torching out, crowning, and spotting. Control efforts at the fire head would probably be ineffective.

Source: Resolute Associates LLC, 2021

¹ NW = northwest; SE = southeast

For average conditions, the potential fire-burning conditions in the Specific Plan Area are considered low to moderate with flame lengths ranging up to 4 feet; these conditions can be extinguished using direct fire suppression tactics. For extreme conditions, flame lengths may increase to 8 to 11 feet; these conditions typically cannot be extinguished using direct fire suppression tactics (Resolute Associates 2021).

4.20.1.3 Off-Site Improvements Wildfire Setting

All proposed off-site transportation and NCSO water and wastewater infrastructure improvements would occur in nearly level, developed areas along existing roadways in the community of Nipomo (see Figures 2-4 through 2-7 in Chapter 2, *Project Description*). Off-site improvements are located within an SRA in high and moderate FHSZs (see Figure 4.20-1; CALFIRE 2021a).

4.20.1.4 Fire Protection

Under the laws of the State of California, only the state and incorporated cities are obligated to provide fire protection services. The state provides wildland and watershed fire protection within SRAs, but does not provide structure protection, rescue and emergency service, or hazardous materials response. Counties provide fire services at their discretion and service levels vary from county to county. The County chose to protect residents and property within its jurisdiction by creating County Fire in partnership with CAL FIRE. The partnering and consolidation between County Fire and CAL FIRE are documented through contractual agreements that direct CAL FIRE/County Fire to provide fire protection and emergency response services and shared funding for the provision of such services.

In the unincorporated community of Nipomo, fire protection and emergency medical services are provided by CAL FIRE Station 20, located on North Oakglen Avenue, east of US 101 in Nipomo, approximately 1.6 miles southeast of the project site (County of San Luis Obispo 2014). Nipomo is also served by CAL FIRE Mesa Station 22 (Station 22) located on Highway 1 on the west side of the mesa, approximately 4.7 miles west (County of San Luis Obispo 2014). Station 20 is one of the busiest fire stations in the county and serves a large and varied response area. Generally, firefighters from Station 20 respond to incidents in the Nipomo core village, along an approximately 12-mile segment of US 101 from the Santa Maria River bridge north to the city of Arroyo Grande, and east through the SR 166 corridor. In addition to a large and varied response area, the Station 20 service population has experienced an increase in growth over the past 5 years (CAL FIRE 2021a). The Nipomo area is also served by CAL FIRE Station 22, which has experienced a substantial increase in calls for service over the past 3 years due to an increase in new development and population in the Nipomo Mesa area.

According to the County’s LUO, the goal response time for County Fire is 7 minutes for urban areas and 8 minutes for suburban areas at least 90% of the time (Resolute Associates 2021). These goal response times include the time it takes for dispatch to process the call and for firefighters to board the engine, which is 3 minutes. Therefore, travel time to a project area should be between 3 and 4 minutes to meet the

goals established in the LUO. Currently, travel time to the project site is approximately 7 minutes from Station 20 and approximately 6 minutes from Station 22, which would exceed the goal response time established in the LUO (Resolute Associates 2021).

4.20.2 Regulatory Setting

4.20.2.1 Federal

4.20.2.1.1 CODE OF FEDERAL REGULATIONS

Under 29 CFR Sections 1910.38 and 1910.39, an employer must have an Emergency Action Plan and Fire Prevention Plan that are accessible to employees within a workplace. Such plans shall include information regarding emergency reporting, evacuation and exit routes, roles and responsibilities in the event of an emergency, accounting for employees following an emergency evacuation, and the need for performing rescue or medical duties. An employer is required by 29 CFR 1910.119 to have accessible information regarding hazardous chemicals, employee training regarding the use of dangerous equipment with hazardous materials, and to perform a process hazard analysis to reduce increased risk of fire caused by hazardous materials use. In addition, 29 CFR 1910.155 Subpart L requires employers to provide and maintain functional fire safety equipment.

4.20.2.2 State

4.20.2.2.1 2019 CALIFORNIA FIRE CODE

The purpose of the 2019 California Fire Code (CFC) is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings. The CFC also incorporates requirements to provide safety and assistance to fire fighters and emergency responders during emergency operations.

The CFC applies to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building, structure, and any appurtenances connected or attached to building structures throughout the state. The CFC establishes regulations related to safeguarding buildings and structures, including the following:

1. The hazard of fire and explosion arising from the storage, handling, or use of structures, materials, or devices.
2. Conditions hazardous to life, property, or public welfare in the use or occupancy of buildings, structures or premises.
3. Fire hazards in the buildings or structures or on premises from use of, occupancy of, or operation.
4. Matters related to the construction, extension, repair, alteration, or removal of fire suppression or alarm systems.
5. Conditions affecting the safety of fire fighters and emergency responders during emergency operations.

Chapter 49 of the CFC provides minimum standards to increase the ability of a building to resist the intrusion of flame or burning embers being protected by a vegetation fire and contributes to a systematic reduction of losses through the use of performance and perspective requirements.

4.20.2.2.2 CALIFORNIA BUILDING CODE

Chapter 7A of the CBC applies to building materials, systems, and/or assemblies used in the exterior design and construction of new building located within a WUI Fire Area. The purpose of this chapter of the CBC is to establish minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within an SRA or any WUI Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire.

4.20.2.2.3 CALIFORNIA RESIDENTIAL CODE

California Residential Code Section R337 establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within an SRA or any WUI Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire. New buildings located in any FHSZ or WUI fire area are required to comply with provisions of this chapter.

4.20.2.2.4 CALIFORNIA PUBLIC RESOURCES CODE

PRC Section 4290 establishes the minimum wildfire protection standards related to defensible space in conjunction with building, construction, and development within an SRA. These regulations apply to all residential, commercial, and industrial buildings within SRAs and lands designated as high and very high FHSZs. PRC Section 4291 requires that a person who owns, leases, controls, operates, or maintains a building or structure in or adjacent to WUI Fire Areas or other areas susceptible to wildfire must maintain 100 feet of defensible space and maintain fire fuels.

4.20.2.3 Local

4.20.2.3.1 COUNTY OF SAN LUIS OBISPO GENERAL PLAN

Safety Element

The County's Safety Element includes policies and implementation measures for reducing risk related to natural or other potential disasters within the county. The Safety Element has two basic principles: to be ready for disaster and to manage development to reduce risk. The Safety Element provides goals, policies, and programs to reduce the risk of loss due to potential natural hazards, including wildfire hazards, within the county, with the purpose of providing standards for reducing the risk of exposure to hazards.

4.20.2.3.2 SAN LUIS OBISPO COUNTY MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN

The San Luis Obispo County MJHMP has a goal of providing practical, meaningful, attainable, and cost-effective mitigation solutions to reduce vulnerability to the identified hazards and ultimately reduce both human and financial losses from hazard events (County of San Luis Obispo 2019b).

4.20.2.3.3 SAN LUIS OBISPO COUNTY EMERGENCY OPERATIONS PLAN

The County's Emergency Operations Plan (EOP) identifies the departments and agencies designated to perform response and recovery activities and specifies tasks they must accomplish; outlines the integration of assistance that is available to local jurisdictions during disaster situations that generate emergency response and recovery needs beyond what the local jurisdiction can satisfy; specifies the direction, control, and communications procedures and systems that will be relied upon to alert, notify, recall, and dispatch emergency response personnel; identifies key continuity of government operations; and describes the overall logistical support process for planned operations.

4.20.2.3.4 SAN LUIS OBISPO COUNTY STRATEGIC COMMUNITY WILDFIRE PROTECTION PLAN

The *San Luis Obispo County Strategic Community Wildfire Protection Plan* (Strategic CWPP) is a cohesive document that was created with the intent of supporting the vision, goals, and objectives of the California Fire Plan. The Strategic CWPP identifies the county's physical and social characteristics, identifies and evaluates landscape-scale fire hazard variables, utilizes Priority Landscape data sets for evaluating wildfire risk, identifies measures for reducing structural ignitability, and identifies potential fuel reduction projects and techniques for minimizing wildfire risk (County of San Luis Obispo 2019c). The goal of the Strategic CWPP is to provide a planning-level framework for hazardous fuel assessment and reduction within the county to protect structures and assets and to reduce the potential for wildfire to occur. Specific goals of the Strategic CWPP include the following:

1. Improving the availability and use of information regarding hazard and risk assessment;
2. Providing guidance for land use planning efforts;
3. Promoting a shared vision among communities and multiple fire jurisdictions;
4. Establishing fire resistance in communities;
5. Prioritizing protection of communities and other high-priority watersheds;
6. Promoting collaboration between government agencies and a broad representation of stakeholders;
7. Improving fire suppression and prevention capabilities;
8. Promoting post-fire recovery efforts; and
9. Maintaining accountability through performance-based monitoring.

In addition, the Strategic CWPP was developed with the cooperation of key stakeholders and prioritizes protection of communities, natural resources, and the lives of the public and firefighters. These priorities are represented in the following tactical principles:

1. Increase the safety to residents and firefighters during wildland fires;
2. Reduce the costs and losses associated with wildland fires;
3. Support implementation of WUI building standards through coordination and cooperation with local government planning departments;
4. Support the implementation and maintenance of defensible space around structures;
5. Support project work and planning efforts that encourage the development and/or maintenance of safe ingress and egress routes for emergency incidents;
6. Promote cooperation between fire agencies in the county to minimize wildland fire damage through strategic fuel treatment projects;
7. Utilize fire prevention efforts to reduce ignitions within the county;
8. Conduct post-incident analysis to evaluate success in achieving the 95% threshold of keeping fires less than 10 acres in size; and
9. Promote public education efforts about wildland fire through the support of the San Luis Obispo County Community Fire Safe Council (SLOCCFSC) and Firewise community activities.

4.20.2.3.5 COUNTY OF SAN LUIS OBISPO COUNTY CODE

Title 16 of the County Code identifies requirements for fire prevention throughout the County. The 2019 CFC, including Chapter 4, Section 103, Section 503, and Appendices B, BB, C, CC, F, and H, have been adopted by reference into Title 16 of the County Code. Title 16 includes requirements for storage of flammable materials and explosives, roadways, driveways, sprinkler systems, addressing, water tanks, and access.

4.20.2.3.6 SAN LUIS OBISPO COUNTY FIRE SERVICES MUTUAL AID PLAN

Due to the location and size of San Luis Obispo County, it is necessary to provide cooperative assistance to departments, agencies, and jurisdictions through automatic or mutual aid. The San Luis Obispo County Fire Services Mutual Aid Plan was created with the following purpose:

- Upon demand, provide the cost-effective use of the emergency resources of all jurisdictions
- Achieve a balance over the long run between providing and receiving entities
- Eliminate complex financial and legal agreements
- Address all mutual aid responses and station coverage assignments required of the fire service, including, but not limited to, fire, rescue, hazardous materials, earthquake, natural and human-made disasters, and mass casualty incidents

4.20.2.4 Applicable State, Regional, and Local Land Use Plans and Policies Relevant to Wildfire

Table 4.20-2 lists applicable state, regional, and local land use policies and regulations pertaining to wildfire that were adopted for the purpose of avoiding or mitigating an environmental effect and that are relevant to the proposed project. A general overview of these policy documents is presented in Section 4.20.2, *Regulatory Setting*, and Chapter 3, *Environmental Setting*. Also included in Table 4.20-2 is an analysis of project consistency with identified policies and regulations. Where the analysis concludes the proposed project would potentially conflict with the applicable policy or regulation, the reader is referred to Section 4.20.5, *Project-Specific Impacts and Mitigation Measures*, and Section 4.11, *Land Use and Planning*, for additional discussion.

Table 4.20-2. Preliminary Policy Consistency Evaluation

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
County of San Luis Obispo General Plan		
Safety Element		
Policy S-2 Emergency Preparedness. Continue to improve preparedness programs that educate and organize people to respond appropriately to disasters. They include education and awareness programs for individuals, families, institutions, businesses, government agencies and other organizations.	The intent of this policy is to improve emergency preparedness programs.	Potentially Consistent. The project would be consistent with applicable emergency response and evacuation plans with implementation of identified mitigation. Mitigation Measure WF/mm-1.1 has been identified to require HOA coordination with County Fire to identify temporary refuge areas and develop a method of public outreach to provide information regarding emergency

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<p>Policy S-3 Coordination. Improve coordination among City, County, and State programs, and among others working to reduce the risks of disasters. This should also include improved coordination with the news media. This will result in more effective preparedness, response, and recovery from disasters.</p>	<p>The intent of this policy is to improve emergency response coordination between local jurisdictions and governmental agencies.</p>	<p>planning and alerting within the Specific Plan Area.</p> <p>Potentially Consistent. Implementation of the project would not affect coordination between cities, the County, and the state. Mitigation Measure WF/mm-1.1 has been identified to require HOA coordination with County Fire to identify temporary refuge areas and develop a method of public outreach to provide information regarding emergency planning and alerting within the Specific Plan Area. With implementation of identified mitigation measures, the project would be potentially consistent with this policy.</p>
<p>Policy S-13 Pre-Fire Management. New development should be carefully located, with special attention given to fuel management in higher fire risk areas. Large, undeveloped areas should be preserved so they can be fuel managed. New development in fire hazard areas should be configured to minimize the potential for added danger.</p> <p>Standard S-30 Site homes near one another to the extent practicable to reduce the need for multiple response teams during fires. Require that the subdivision design be reviewed by fire safety personnel. Require the clustering of lots or buildings in high and very high fire hazard areas as appropriate. New developments in high and very high fire hazard areas should maintain open areas large enough to allow for control burns and other vegetation management programs.</p>	<p>The intent of this policy is to minimize potential risks associated with wildfire hazards.</p>	<p>Potentially Consistent. The project has the potential to exacerbate wildfire risks due to development within a high FHSZ. Mitigation Measure WF/mm-2.1 has been identified to ensure maintenance of open space areas on-site to reduce risk of wildfire ignition.</p>
<p>Policy S-14 Facilities, Equipment, and Personnel. Ensure that adequate facilities, equipment and personnel are available to meet the demands of fire fighting in San Luis Obispo County based on the level of service set forth in the fire agency's master plan.</p>	<p>The intent of this policy is to maintain adequate service levels for firefighting in the county.</p>	<p>Potentially Consistent. As described in Section 4.15, <i>Public Services</i>, the project would result in an increased need for fire protection services, which would be offset through payment of Public Facilities Fees and implementation of identified mitigation that requires the provision of land for future development of a new fire station.</p>
<p>Policy S-16 Loss Prevention. Improve structures and other values at risk to reduce the impact of fire. Regulations should be developed to improve the defensible area surrounding habitation.</p>	<p>The intent of this policy is to reduce the impact of fire on communities.</p>	<p>Potentially Consistent. The project has the potential to exacerbate wildfire risks due to development within a high FHSZ. Future development would be subject to design standards included in the CFC, the CBC, and PRC Section 4290 and applicable CAL FIRE and County regulations to reduce wildfire risk associated with development in a high FHSZ. Additionally, Mitigation Measure WF/mm-2.1 has been identified to ensure maintenance of open space areas on-site to reduce risk of wildfire ignition.</p>
<p>Policy BR 2.7 Fire suppression and sensitive plants and habitats. Balance the need for fire suppression and/or vegetation (fuel) management with the need to protect sensitive biological resources. Where possible, design land divisions and development so that fuel-breaks, vegetation, or fuel modification areas that are needed to reduce fire hazards do not disrupt special-status</p>	<p>The intent of this policy is to protect sensitive biological resources during fuel management activities.</p>	<p>Potentially Consistent. Mitigation Measure WF/mm-2.1 includes vegetation management in accordance with the Dana Reserve Oak Mitigation Plan on open space areas on-site to reduce risk of wildfire ignition and protect sensitive biological resources.</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<p>plant communities or critical habitat for special status animal species. Fuel-breaks and vegetation or fuel modification areas shall be located on the development side of required setbacks from sensitive features and shall be in addition to the required setbacks.</p>		
<p>San Luis Obispo County Multi-Jurisdictional Hazard Mitigation Plan</p>		
<p>Goal 2. Mitigate hazard impacts to existing and future development.</p>	<p>The intent of this policy is to mitigate potential hazards to existing and future development.</p>	<p>Potentially Consistent. The project has the potential to exacerbate wildfire risks due to development within a high FHSZ. Future development would be subject to design standards included in the CFC, the CBC, and PRC Section 4290 and applicable CAL FIRE, and County regulations to reduce wildfire risk associated with development in a high FHSZ. Additionally, Mitigation Measure WF/mm-2.1 has been identified to ensure maintenance of open space areas on-site to reduce risk of wildfire ignition near proposed land uses.</p>
<p>Objective 2.1. Limit new development in hazard areas, and as permissible, build to standards that will prevent or reduce damage.</p>	<p>The intent of this policy is to mitigate potential hazards to new development.</p>	<p>Potentially Consistent. The project has the potential to exacerbate wildfire risks due to development within a high FHSZ. Future development would be subject to design standards included in the CFC, the CBC, and PRC Section 4290 and applicable CAL FIRE, and County regulations to reduce wildfire risk associated with development in a high FHSZ. Additionally, Mitigation Measure WF/mm-2.1 has been identified to ensure maintenance of open space areas on-site to reduce risk of wildfire ignition near proposed land uses.</p>
<p>Goal 3. Build and support local capacity to address, and commitment to minimize, San Luis Obispo County's vulnerability to potential hazards through collaboration with the incorporated cities and special districts.</p>	<p>The intent of this policy is to improve emergency preparedness through collaboration with incorporated cities and special districts.</p>	<p>Potentially Consistent. As described in Section 4.15, <i>Public Services</i>, the project would result in an increased need for fire protection services, which would be offset through payment of Public Facilities Fees and implementation of identified mitigation that requires the provision of land for future development of a new fire station.</p>
<p>Objective 3.1. Improve existing capabilities to manage emergency situations.</p>	<p>The intent of this policy is to improve emergency response following emergency situations.</p>	<p>Potentially Consistent. As described in Section 4.15, <i>Public Services</i>, the project would result in an increased need for fire and police protection services, which would be offset through payment of Public Facilities Fees. Increased demand on fire protection services would be offset through implementation of identified mitigation that requires the provision of land for future development of a new fire station. The project would also improve circulation and emergency access/evacuation by providing two through-connections through the Specific Plan area to Willow Road.</p>
<p>Goal 4. Minimize the level of injury and loss of life and damage to existing and future critical facilities, property and infrastructure due to natural hazards.</p>	<p>The intent of this policy is to minimize risk as a result of natural hazards.</p>	<p>Potentially Consistent. The project has the potential to exacerbate wildfire risks due to development within a high FHSZ. Future development would be subject to design standards included in the CFC, the CBC, and PRC Section 4290 and applicable CAL FIRE,</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Objective 4.1. Enhance the ability of community assets so as to minimize damages sustained from potential hazards.	The intent of this policy is to enhance existing programs to minimize damages sustained from potential hazards.	and County regulations to reduce wildfire risk associated with development in a high FHSZ. Additionally, Mitigation Measure WF/mm-2.1 has been identified to ensure maintenance of open space areas on-site to reduce risk of wildfire ignition.
Objective 4.2. Develop a comprehensive approach to reducing the level of damage and losses due to hazards through utilizing resilient community and critical infrastructure design, management, code enforcement, GIS mapping, improved policies, procedures, training evacuation planning, and planning processes.	The intent of this policy is to reduce the level of damage and losses due to hazards.	Potentially Consistent. The project includes the construction of two collector roads intended to improve existing emergency response and evacuation conditions within the project region. In addition, construction of these collector roads would ensure buildout of the project does not adversely affect emergency response and evacuation efforts. Mitigation has been included to set aside land for construction of a future fire department to improve emergency response ability in the regions. Further, the project would be subject to the payment of Public Facilities Fees to offset demand on fire and police protection services.

4.20.3 Thresholds of Significance

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the County. Specifically, the project would be considered to have a significant effect on wildfire if the effects exceed the significance criteria described below:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan.
- b. 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.
- c. 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.
- d. 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.

Each of these thresholds is discussed under Section 4.20.5, *Project-Specific Impacts and Mitigation Measures*, below.

4.20.4 Impact Assessment and Methodology

The following impact assessment is based, in part, on the *Dana Reserve Fire Protection Plan* (Resolute Associates 2021), which includes an in-depth assessment of wildfire risks for the Specific Plan Area and surrounding area.

4.20.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?

Specific Plan Area

WF Impact 1: The project could impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant with mitigation (Class II).

Emergency response and evacuation plans that have been adopted by the County include the County's Safety Element, San Luis Obispo County MJHMP, EOP, and Strategic CWPP. Applicable policies and implementation measures included in these emergency and evacuation plans are described below.

The Specific Plan Area is 288 acres in size and is comprised of three parcels located adjacent to the US 101 southbound lane in the community of Nipomo. Existing site access is provided via Hetrick Avenue from the west and Cherokee Place from the north. The northern parcels (APNs 091-301-030 and 091-301-031) would be used to provide road extensions to allow for additional access to the Specific Plan Area from Willow Road. APN 091-325-022 would be used to provide an extension of North Frontage Road to allow for connection to the Specific Plan Area. Two additional emergency access points are proposed within Neighborhood 9, adjacent to Hetrick Avenue, and Neighborhood 7, as a continuation of Cory Way (see Figure 2-15 in Chapter 2, *Project Description*). These emergency access points would be designed and constructed as pedestrian, bicycle, and equestrian facilities but would be fully compliant with CAL FIRE and County Public Works Department requirements for emergency access (Resolute Associates 2021). In addition, all other proposed roadways, road improvements, and access points would be required to comply with PRC Section 4290 and CAL FIRE and County Public Works Department requirements to allow for proper emergency access to the site. Development plans are subject to review and approval by fire safety personnel per the County's Safety Element to ensure that adequate emergency access and other safety features are included in the final project design.

All existing and proposed access points would provide both ingress and egress for residents, guests, and emergency responders. Full buildout of the Specific Plan Area would result in the construction of 831 new residential single-family units, 458 new residential multi-family units, 152 ADUs, and commercial and light industrial development. The project is anticipated to generate a full buildout population of 4,554 residents and 272 employees and generate 18,662 additional daily trips (CCTC 2021). In the event of an evacuation, proposed internal and existing public roads would be used to reach US 101, located directly east of the site. Proposed individual neighborhoods within the Specific Plan Area would have two proposed ingress and egress points and all dead-end roads would have required turnarounds (Resolute Associates 2021).

The County's EOP identifies the importance of public education and notification prior to and during an emergency situation. In addition, the Strategic CWPP identifies a need to promote public education efforts about wildland fire. Individual neighborhood HOAs and the master Dana Reserve HOA would be responsible for providing information to residents regarding family emergency planning (including

evacuation areas), emergency alerting, emergency supply kits, and care for animals in an emergency (Resolute Associates 2021). Mitigation Measure WF/mm-1.1 requires the master Dana Reserve HOA to commit to annual public outreach in coordination with the County to provide residents with information about emergency planning and alerting within the Specific Plan Area. Implementation of Mitigation Measure WF/mm-1.1 would ensure consistency with the County’s EOP and Strategic CWPP.

Based on the scale of proposed development, it is likely that, in the event of an evacuation, the rate of egress from the Specific Plan Area would be reduced; however, all proposed access points, roads, and evacuation routes would be constructed and identified in accordance with CAL FIRE and County Public Works Department requirements to ensure safety along evacuation routes and compliance with all applicable emergency response and emergency evacuation plans.

During project construction, there would be a limited number of all-weather access roads available to allow fire and ambulance access to construction areas. Construction activities would be required to comply with International Fire Code (IFC) Section 3312 and applicable PRC sections to prevent ignition and spread of a wildfire during construction activities. In addition, proposed construction activities may require traffic controls along nearby roadways and may slow traffic due to heavy vehicles and machinery traveling along nearby roadways. However, any traffic controls and vehicle and equipment movement would be temporary in nature and would not result in long-term impacts. Therefore, construction of the project would not impede any emergency response or evacuation plans.

The project would provide adequate emergency ingress and egress, emergency access, and accessibility to water for fire suppression, and would comply with all appropriate fire prevention methods. Implementation of Mitigation Measure WF/mm-1.1 would ensure consistency with the County’s Safety Element, San Luis Obispo County MJHMP, EOP, and Strategic CWPP; therefore, potential impacts would be *less than significant with mitigation*.

WF Impact 1 (Class II)	
The project could impair an adopted emergency response plan or emergency evacuation plan.	
Mitigation Measures	
Implement Mitigation Measure PS/mm-1.1.	
WF/mm-1.1	<p><i>Prior to occupancy of any Dana Reserve Specific Plan neighborhoods, the master Dana Reserve Homeowner’s Association shall coordinate with individual Dana Reserve Specific Plan neighborhood Homeowner’s Associations and County of San Luis Obispo Fire Department to identify temporary refuge areas throughout the community. Temporary refuge areas shall be documented and available for residents and guests within the Specific Plan Area. Refuge areas may include the following:</i></p> <ol style="list-style-type: none"> 1. <i>Parking lots in commercial and multi-family residence areas</i> 2. <i>Neighborhood parks</i> 3. <i>Public parks</i> 4. <i>Neighborhood pocket parks</i> <p><i>The master Homeowner’s Association shall also coordinate with individual Dana Reserve Specific Plan neighborhood Homeowner’s Associations and County of San Luis Obispo Fire Department to develop a method of public outreach to provide information regarding emergency planning and alerting within the Specific Plan Area. Information to be provided to the public shall include, but not be limited to, the following:</i></p> <ol style="list-style-type: none"> 1. <i>Location of established refuge areas</i> 2. <i>Emergency entry and exit points within the community</i>

WF Impact 1 (Class II)
<ol style="list-style-type: none"> 3. <i>Nearest emergency entry and exit points to each specific neighborhood</i> 4. <i>Family emergency planning</i> 5. <i>Types of emergency alerting and methods to receive emergency notifications</i> 6. <i>Emergency supply kit necessities</i> 7. <i>Care options for pets and other animals in an emergency</i> <p style="text-align: center;"><i>Public outreach shall be conducted annually and include any updated emergency planning information, as necessary. Compliance shall be documented with the County of San Luis Obispo.</i></p>
Residual Impacts
<p><i>With implementation of Mitigation Measures PS/mm-1.1 and WF/mm-1.1, residual impacts related to consistency with an emergency response or evacuation plan would be less than significant (Class II). See Section 4.15, Public Services, PS Impact 1 for residual impacts related to PS/mm-1.1.</i></p>

Off-Site Improvements

WF Impact 2: Off-site improvements could impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant (Class III).

The project includes off-site construction for installation of proposed NCSO water and sewer infrastructure and transportation improvements. Proposed off-site transportation improvements would occur at the location of proposed internal roadway connections to existing roads outside of the Specific Plan area (Willow Road, North Frontage Road, Pomeroy Road, Hetrick Avenue, and Cory Way). Proposed NCSO water infrastructure improvements are proposed at the intersection of North Dana Foothill Road and West Tefft Street, along West Tefft Street and North Oakglen Avenue, under US 101, and at two of the four proposed access points into the Specific Plan Area (see Figure 2-5 in Chapter 2, *Project Description*). NCSO sewer improvements would occur along North Frontage Road from the Southland WWTF to the Specific Plan Area (see Figures 2-6 and 2-7 in Chapter 2, *Project Description*).

Improvements conducted at proposed access points to the Specific Plan Area would result in temporary impairment of emergency access to the site; however, other access routes would remain open to allow for emergency ingress and egress. Construction and installation of other proposed off-site water and sewer improvements would likely require traffic controls, including partial lane closures. Proposed improvement projects are anticipated to occur incrementally, which would reduce the amount of potential traffic congestion caused by lane closures or other traffic controls. Traffic controls would be temporary in nature and would include detour routes as necessary to allow for emergency and other access to surrounding areas.

Proposed infrastructure improvements would not result in aboveground features that could physically impede any established emergency response or evacuation routes. New infrastructure and improvements would be maintained by existing NCSO employees and would not result in population growth that could create additional vehicle trips along evacuation routes. Infrastructure improvements would be required to comply with all applicable CBC, CFC, PRC, and County Code requirements to reduce fire risk associated with construction of utilities. Therefore, potential short- and long-term impacts associated with implementation of expanded NCSO infrastructure and transportation improvements are not anticipated to impede an emergency response or evacuation plan, and impacts would be *less than significant*.

WF Impact 2 (Class III)
Off-site improvements could impair an adopted emergency response plan or emergency evacuation plan.
Mitigation Measures
<i>Mitigation is not necessary.</i>
Residual Impacts
<i>Based on required compliance with existing state and local requirements, residual impacts would be less than significant (Class III).</i>

WOULD THE PROJECT, 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?

Specific Plan Area

WF Impact 3: The project could exacerbate wildfire risks due to development within a high fire hazard severity zone. Impacts would be less than significant with mitigation (Class II).

There are three factors that influence wildfire behavior: weather, topography, and fuel (Resolute Associates 2021). The Specific Plan Area and surrounding areas include relatively flat topography with areas of rolling hills. The Specific Plan Area is mostly undeveloped and supports dense oak, chaparral, and grassland vegetation. Based on existing conditions, the Specific Plan Area and surrounding areas have been designated as a high FHSZ by CAL FIRE (CAL FIRE 2021a). Development within a high FHSZ has the potential to expose project occupants to wildfire hazards, including pollutant concentrations.

CONSTRUCTION

Future buildout of the Specific Plan Area would require temporary construction activities that may increase fire risk in the Specific Plan Area due to the use of combustible materials. The project would be required to comply with IFC Section 3312, which requires a temporary or permanent water system for fire protection to be available prior to the arrival of combustible materials on-site. In addition, the construction phase of the project would be required to comply with all applicable PRC requirements, including requirements for spark arresters, clearance around welding operations, smoking restrictions, and extinguishers on-site (Resolute Associates 2021). Compliance with the IFC and PRC requirements intended to reduce the potential to ignite a wildfire on-site would ensure temporary construction-related wildfire impacts would be *less than significant*.

COMMERCIAL AND RESIDENTIAL BUILDINGS

Full buildout of the project would result in 238.2 acres of single-family residential development, multi-family residential development, commercial development, and other site improvements. Due to the project’s location in a high FHSZ, future residential development would be required to comply with requirements identified in Chapter 7A of the CBC and Chapter R337 of the California Residential Code for roofs and roof edges, exterior walls and siding, eaves and porch ceilings, vents, windows and exterior

doors, exterior decking and stairs, underfloor and appendages, and residential sprinklers (Resolute Associates 2021). Requirements of the CBC and California Residential Code were created to reduce wildfire risk associated with development in high FHSZs; therefore, compliance with the CBC and California Residential Code would reduce the potential for wildfire risk associated with proposed residential development.

Future commercial development would be required to comply with Title 16 of the County Code, which requires installation of automatic fire sprinklers, fire alarm systems, and portable fire extinguishers in all commercial buildings over 1,000 square feet. As required by the County Fire Marshal, a fire protection engineer would review all commercial fire protection system designs. In addition, all new commercial buildings would be required to comply with the building material requirements identified in Chapter 7A of the CBC (Resolute Associates 2021). Compliance with Title 16 of the County Code and the CBC would reduce potential wildfire risk associated with commercial development within a high FHSZ.

All future development and site improvements would be required to comply with requirements included in the CBC, CFC, and Title 16 of the County Code for emergency vehicle access, addressing, water supply, defensible space, fire protection systems, and the use of fire-resistant building materials. All commercial properties and gates would be required to install a KNOX Box in a location approved by County Fire to allow for emergency fire access to the site. All new homes and businesses must have clear address identification in a visible location and multi-family complexes must include directory signage. Landscaping in public areas of the Specific Plan Area must be designed to include fire-resistant plants that are strategically placed to resist the spread of fire to nearby homes and hardscaping should use limited combustible materials in or near structures. The project would be required to supply adequate domestic and fire water storage and delivery system (Resolute Associates 2021). In compliance with PRC Section 4291, the project would be required to create 100 feet of defensible space around all structures to protect against embers that may result from a wildfire. Based on required compliance with the CBC, CFC, PRC, and Title 16 of the County Code, future development of residential and commercial buildings within the Specific Plan Area would not exacerbate wildfire risk because all buildings and improvements would be developed with fire-resistant building materials and would allow for adequate emergency access and fire suppression requirements. Therefore, potential impacts would be *less than significant*.

OPEN SPACE

Buildout of the Specific Plan Area would result in 49.8 acres of open space area. Proposed open space areas are characterized by rolling hills and consist of approximately 20.2 acres of coast live oak woodland, approximately 6.2 acres of chamise-black sage chaparral, and approximately 23.2 acres of grassland. Wildfire can quickly burn through grasses, chaparral, and oak woodland understory (Resolute Associates 2021). The project includes several pedestrian, bicycle, and equestrian trails that either traverse open space areas or travel along the perimeter. In addition, approximately 100 parcels would be arranged along the perimeter of the open space areas. Some backyards are located directly adjacent to open space and others are separated from the open space by a road or trail. Due to the location of residential units near open space areas, there is potential for human activities, including arson, cigarette butts, fireworks, campfires, or operating vehicles or machinery to result in wildfire (WorldAtlas 2021b). This risk would be further amplified if oak woodlands and other vegetation within the proposed open space areas were left unmanaged. Following full buildout of the Specific Plan Area, each neighborhood within the community would have an HOA with a master HOA in place that would be responsible for maintenance of the open space areas (Resolute Associates 2021). Mitigation Measure WF/mm-3.1 would require the master Dana Reserve HOA to adopt CC&Rs that include requirements for the maintenance and protection of the open space areas, including restrictions on uses and vegetation management. In addition, the project would be required to comply with PRC Section 4291 for defensible space creation to protect buildings from embers associated with wildfires. Implementation of Mitigation Measure WF/mm-3.1 and compliance with PRC Section 4291 would reduce the potential for wildfire to occur within

proposed open space areas that could exacerbate risk to proposed residential and commercial development; therefore, impacts would be *less than significant with mitigation*.

WF Impact 3 (Class II)	
The project could exacerbate wildfire risks due to development within a high fire hazard severity zone.	
Mitigation Measures	
<i>WF/mm-3.1</i>	<p><i>Prior to project occupancy, the master Homeowner’s Association shall adopt Covenants, Conditions, and Restrictions that include requirements for the maintenance and protection of the open space areas that ensure that these spaces are maintained in perpetuity. Prior to adoption by the master Homeowner’s Association, Covenants, Conditions, and Restrictions shall be created in coordination with the County to ensure feasibility of open space management practices. The Covenants, Conditions, and Restrictions shall be enforced by the master Homeowner’s Association throughout the lifetime of the project. Language regarding protection and management of open space areas as it pertains to wildfire may include, but shall not be limited to:</i></p> <ol style="list-style-type: none"> <i>1. Smoking, use of cooking equipment, or any other ignition source is prohibited in the open space areas.</i> <i>2. Safety precautions are required when using equipment capable of creating a spark; this includes spark arrestors.</i> <i>3. All fireworks or other devices that could cause an ignition of a fire are prohibited throughout the Dana Reserve.</i> <i>4. Overnight camping is prohibited.</i> <i>5. Motorized vehicles are not permitted in the open space areas. (except emergency vehicles, vehicles permitted by the Homeowner’s Association to conduct official business, and single-rider motorized vehicles adapted for recreational use by people with disabilities).</i> <i>6. Discharging or carrying firearms, crossbows, fireworks, or projectile weapons of any kind is not permitted (except law enforcement officials) in the Dana Reserve.</i> <i>7. The Homeowner’s Association will maintain fire prevention signage in fire-prone areas near or on trails.</i> <i>8. The Homeowner’s Association will conduct vegetation management in the open spaces, in the retention basins, on trails, and near U.S. Route 101 that prevent or reduce the ability for a wildfire to spread to other properties in proximity. Methods used will provide for the protection of the open space environment.</i> <i>9. Fencing or barriers adjoining the open space areas, whether owned privately or by the Homeowner’s Association, will be constructed of a fire-resistive material so that it will not convey or contribute to the spread of fire from or to the open space areas (exception may include an open-type fence, such as a split-rail fence). Combustible fence material will not be used within 5 feet of structures.</i> <i>10. Vegetation management will be consistent with Dana Reserve’s County of San Luis Obispo-approved oak woodland habitat management plan.</i> <i>11. The Homeowner’s Association is authorized to enter into contracts and agreements for vegetation management in and near the open space areas that includes hand, mechanical, animal, prescribe fire, herbicide, and other methods consistent with accepted vegetation management practices.</i> <i>12. The Homeowner’s Association is authorized to increase assessment and fines necessary to protect and maintain the open space areas. This may include funds for the hiring of staff and contracts.</i> <i>13. The Homeowner’s Association is authorized to enter into agreements with agencies, land conservancies, and other organizations who also have a mutual concern for the protection of the open space areas.</i>

WF Impact 3 (Class II)
Residual Impacts
<i>With implementation of Mitigation Measure WF/mm-3.1, residual impacts related to wildfire risk would be less than significant (Class II). Fuel-reduction practices to maintain open space areas would be required to be conducted in a manner that would avoid or minimize impacts to biological resources that may result from implementation of fuel reduction techniques; therefore, residual impacts to biological resources are not anticipated.</i>

Off-Site Improvements

WF Impact 4: The project could exacerbate wildfire risks due to development within a high fire hazard severity zone. Impacts would be less than significant with mitigation (Class II).

Proposed off-site improvements would be conducted within a high and moderate FHSZ (see Figure 4.20-1; CAL FIRE 2021a). Although construction and installation of some proposed off-site improvements would occur within a high FHSZ, proposed NCS D water and sewer improvements do not include development of occupiable buildings or structures that could expose occupants to wildfire hazards. Additionally, proposed infrastructure would be required to comply with all CBC, CFC, PRC, and County Code requirements for proper installation to avoid unnecessary risk of wildfire caused by equipment malfunction or ongoing maintenance and repair trips. Therefore, installation of proposed off-site NCS D improvements would not expose occupants to pollutant concentrations or the uncontrolled spread of wildfire and potential impacts would be *less than significant*.

WF Impact 4 (Class III)
The project could exacerbate wildfire risks due to development within a high fire hazard severity zone.
Mitigation Measures
<i>No mitigation is necessary.</i>
Residual Impacts
<i>Based on required compliance with existing state and local requirements, residual impacts would be less than significant (Class III).</i>

WOULD THE PROJECT 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?

Specific Plan Area

WF Impact 5: The project would require installation of internal roads, public utility easements, and utility infrastructure that may exacerbate fire risk. Impacts would be less than significant (Class III).

Buildout of the project would result in the development and installation of internal roads, public utility easements, and utility infrastructure throughout the 288-acre Specific Plan Area. Potable water and wastewater would be provided through NCSD infrastructure within North Frontage, Willow, and Pomeroy Roads and would also require an extension of water and wastewater infrastructure routed throughout the Specific Plan Area. There are existing PG&E overhead service lines along Cherokee Place, Pomeroy Road, and the eastern edge of the Specific Plan Area. New service lines would be undergrounded in or adjacent to the ROW of the proposed commercial and residential roadways. There are no existing gas mains located within the Specific Plan Area; therefore, new gas mains would be constructed as part of the primary backbone roadways to serve new development areas. Construction activities associated with installation of the proposed utility and other associated infrastructure would be required to comply with IFC Section 3312 and PRC sections intended to reduce the potential for short-term construction activities to ignite a wildfire within the project area.

Water for fire suppression would be supplied by a proposed internally looped 8-inch public water main located within public roads within the Specific Plan Area (Resolute Associates 2021). Proposed fire hydrants would be located adjacent to roadways no more than 500 feet apart, except on dead-end streets, which would be no greater than 400 feet apart. The maximum distance from any point on the street frontage to a hydrant would be 250 feet. For commercial or light industrial areas, the maximum spacing would be no greater than 250 feet. As proposed, the fire hydrant system would comply with Appendix C of the CFC. Fire-flow requirements would be required to comply with Appendix B of the CFC to allow for adequate water accessibility for fire protection services. Compliance with the CFC would ensure there is adequate available water for fire suppression throughout the life of the project to reduce risk associated with wildfire.

All internal roads and driveways would be required to comply with Title 16 of the County Code and CAL FIRE and County Public Works Department roadway requirements to ensure proper installation to avoid the need for frequent maintenance or repairs and to allow for adequate emergency access throughout the Specific Plan Area. Proposed water, wastewater, gas, and electric lines would be placed underground, which would reduce the risk of wildfire by avoiding the potential for sparks from power, or other utility, lines to ignite a fire within the Specific Plan Area. In addition, all public utility easements and utility infrastructure would be required to comply with the CBC and CFC for proper installation to avoid the need for frequent repair and maintenance trips that may exacerbate fire risk. In the event that any future construction activities are required for maintenance or repair of utility or other associated infrastructure, those projects would also be required to comply with IFC Section 3312 and applicable PRC sections to reduce potential wildfire risk.

Proposed installation of internal roads, public utility easements, and utility infrastructure throughout the 288-acre Specific Plan Area would be required to comply with the CFC, the CBC, and Title 16 of the County Code and applicable CAL FIRE and County Public Works Department requirements to ensure

proper installation and/or expansion of associated infrastructure to avoid frequent maintenance or repair trips that may exacerbate fire risk and to reduce hazards associated with improper installation, including wildfire risk. In addition, proposed undergrounding of utility infrastructure would be conducive to the long-term reduction of wildfire risk associated with utility infrastructure by avoiding the potential for wildfire ignition. Therefore, installation of associated infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment and impacts would be *less than significant*.

WF Impact 5 (Class III)
The project would require installation of internal roads, public utility easements, and utility infrastructure that may exacerbate fire risk.
Mitigation Measures
<i>Mitigation is not necessary.</i>
Residual Impacts
<i>Based on required compliance with existing state and local regulations, residual impacts would be less than significant (Class III).</i>

Off-Site Improvements

WF Impact 6: Off-site improvements could exacerbate fire risk. Impacts would be less than significant (Class III).

The project includes off-site construction for installation of proposed off-site transportation and NCS D water and sewer infrastructure improvements. Proposed off-site transportation improvements would occur at the location of proposed internal roadway connections to existing roads outside of the Specific Plan Area (Willow Road, North Frontage Road, Pomeroy Road, Hetrick Avenue, and Cory Way; see Figure 2-4 in Chapter 2, *Project Description*). Proposed NCS D water infrastructure improvements are proposed at the North Dana Foothill Road and West Tefft Street intersection, along West Tefft Street and North Oakglen Avenue, under US 101, and at two of the four proposed access points into the Specific Plan Area (see Figure 2-5 in Chapter 2, *Project Description*). NCS D sewer improvements would occur along North Frontage Road from the Southland WWTF to the Specific Plan Area (see Figures 2-6 and 2-7 in Chapter 2, *Project Description*). Proposed off-site NCS D utility infrastructure would be placed underground, which would significantly reduce risk of wildfire ignition caused by sparks or malfunction of associated equipment. In addition, construction and installation of proposed off-site improvements would be required to comply with all CBC, CFC, PRC, and County Code requirements for proper installation of off-site utility infrastructure to further reduce wildfire hazards associated with improper installation. Proper installation of proposed infrastructure would avoid the risk of wildfire by limiting unnecessary maintenance and repair trips to off-site improvement areas that may result in sparks that could lead to wildfire ignition. Based on required compliance with the CBC, CFC, PRC, and County Code, potential impacts related to off-site NCS D improvements would be *less than significant*.

WF Impact 6 (Class III)
Off-site improvements could exacerbate fire risk.
Mitigation Measures
<i>Mitigation is not necessary.</i>

WF Impact 6 (Class III)
Residual Impacts
<i>Based on required compliance with existing state and local regulations, residual impacts would be less than significant (Class III).</i>

WOULD THE PROJECT 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?

Specific Plan Area

WF Impact 7: The project could expose people or structures to risk associated with downslope or downstream flooding or landslides. Impacts would be less than significant (Class III).

As described in Section 4.10, *Hydrology and Water Quality*, the Specific Plan Area is not located within a flood hazard zone and would not be susceptible to flooding. As described in Section 4.8, *Geology and Soils*, the Specific Plan Area and surrounding areas have a low risk of landslide, and the generally flat topography of the project area further reduces landslide potential. Based on existing conditions at the Specific Plan Area, downslope or downstream flooding and landslides are not anticipated to occur at the Specific Plan Area in the event of a wildfire. Future buildout of residential, commercial, and other buildings and structures within the Specific Plan Area would be required to comply with foundational and other building requirements identified in the CBC, which would further reduce the potential to expose people or structures to any post-fire ground instability. Therefore, based on existing conditions at the Specific Plan Area and required compliance with the CBC, development within a high FHSZ is not anticipated to expose people or structures to risk associated with downslope or downstream flooding or landslides and impacts would be *less than significant*.

WF Impact 7 (Class III)
The project could expose people or structures to risk associated with downslope or downstream flooding or landslides.
Mitigation Measures
<i>Mitigation is not necessary.</i>
Residual Impacts
<i>Based on required compliance with existing state and local regulations and standard building practices, residual impacts would be less than significant (Class III).</i>

Off-Site Improvements

WF Impact 8: The project could expose people or structures to risk associated with downslope or downstream flooding or landslides. Impacts would be less than significant (Class III).

As described above, the Specific Plan Area and surrounding areas are not located in an area susceptible to landslides. However, proposed NCSO off-site water infrastructure improvements along West Tefft Street would be located in an identified flood hazard zone (FEMA 2012). Proposed improvements within the identified flood hazard zone along West Tefft Street would be limited to replacement of an existing underground waterline. Therefore, installation of the replacement waterline would not result in aboveground buildings or structures that could expose people or structures to significant risks associated with downslope or downstream flooding. All other improvements would be located in an area with a minimal chance of flooding (FEMA 2012). Therefore, based on the scope of proposed improvements and existing conditions, installation of off-site utility infrastructure improvements is not anticipated to expose people or structures to risk associated with downslope or downstream flooding or landslides, and impacts would be *less than significant*.

WF Impact 8 (Class III)
The project could expose people or structures to risk associated with downslope or downstream flooding or landslides.
Mitigation Measures
<i>Mitigation is not necessary.</i>
Residual Impacts
<i>Based on required compliance with existing state and local regulations, residual impacts would be less than significant (Class III).</i>

4.20.6 Cumulative Impacts

WF Impact 9: The project would not result in a cumulatively considerable impact related to wildfire. Impacts would be less than significant (Class III).

Existing and foreseeable future development projects within the project region are identified in Chapter 3, *Environmental Setting*. Based on future buildout the Specific Plan Area, and the potential buildout of other foreseeable development projects in the county, it is anticipated that there would be an increase in vehicles traveling on local roadways, which could slow public egress in the event of an evacuation. In addition, reasonably foreseeable future development projects in the area would also contribute to increased congestion and reduced rates of egress in the event of an evacuation. The proposed project would provide public and emergency entry and exit points throughout the Specific Plan Area in accordance with PRC, CAL FIRE, and County Public Works Department requirements for adequate emergency access. Development plans are subject to review and approval by fire safety personnel per the County's Safety Element to ensure that adequate emergency access and other safety features are included in the final project design. In addition, Mitigation Measure WF/mm-1.1 has been included for the proposed project to facilitate public outreach to inform residents of the DRSP of potential threats, different evacuation points, refugee areas, and alert notifications to provide an efficient emergency response. The project would provide adequate facilities for emergency ingress and egress and, as

discussed below, the project would be compliant with fire safety and building requirements to reduce wildfire risk, which is consistent with the County’s Safety Element, San Luis Obispo County MJHMP, EOP, and Strategic CWPP. Reasonably foreseeable future projects would also be required to provide adequate emergency access for emergency and public ingress and egress and would be subject to environmental review to ensure consistency with applicable emergency response and evacuation plans.

Future construction of the proposed project and reasonably foreseeable projects located within a high or very high FHSZ has the potential to increase risk of wildfire due to equipment and machinery use that could result in ignition. However, construction of this project and all reasonably foreseeable projects would be subject to IFC Section 3312 and all applicable PRC sections to minimize the potential to ignite and/or exacerbate a wildfire. Therefore, based on required compliance with existing regulations, potential construction-related impacts would be less than cumulatively considerable.

The proposed project and all other reasonably foreseeable future development projects in the area would be required to comply with the CBC, CFC, California Residential Code, PRC, and Title 16 of the County Code to reduce potential risk associated with development in a high FHSZ. Proposed and foreseeable future development of roadways and other improvements would be required to comply with CAL FIRE and County Public Works Department requirements and with CFC, CBC, and Title 16 of the County Code sections for emergency vehicle access, addressing, water supply, defensible space, fire protection systems, and the use of fire-resistant building materials. In addition, Mitigation Measure WF/mm-2.1 has been included to reduce risk associated with human activities and vegetation management of proposed open space areas within the Specific Plan Area. Therefore, based on required compliance with existing CBC, CFC, County Code, and PRC requirements and implementation of Mitigation Measure WF/mm-2.1, implementation of the proposed project would not exacerbate wildfire risks.

Proposed infrastructure for the off-site NCSO water and sewer system improvements would not result in aboveground features that could physically impede any established roadways or other facilities needed for emergency response or evacuation. New infrastructure and improvements would be maintained by existing NCSO employees and would not result in population growth that could create additional vehicle trips along evacuation routes. Infrastructure improvements would be required to comply with all applicable CBC, CFC, PRC, and County Code requirements to reduce wildfire risk associated with construction of utilities.

All other reasonably foreseeable projects would be subject to environmental review and would also be required to comply with all applicable CBC, CFC, California Residential Code, PRC, and Title 16 of the County Code sections for future residential and/or commercial development and additional CAL FIRE and County Public Works Department requirements for the development of roadways and other improvements. Therefore, the proposed project and other reasonably foreseeable projects would not result in cumulative impacts related to wildfire and associated hazards. Impacts related to wildfire would be *less than cumulatively considerable* and *less than significant*.

WF Impact 9 (Class III)
The project would not result in a cumulatively considerable impact related to wildfire.
Mitigation Measures
<i>Mitigation is not necessary.</i>
Residual Impacts
<i>Cumulative impacts would be avoided through compliance with identified project-specific mitigation; no additional mitigation is needed to avoid or minimize potential cumulative impacts. Therefore, residual impacts would be less than cumulatively considerable and less than significant (Class III).</i>

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