

5.0 ENVIRONMENTAL IMPACT ANALYSIS

15. PUBLIC SERVICES—FIRE PROTECTION

1. INTRODUCTION

This section of the Draft Environmental Impact Report (EIR) analyzes the Project's potential impacts on existing and planned fire protection and emergency medical services in the Project vicinity and addresses service capacity, fire flow, emergency response times, emergency access, and fire safety equipment based in part on information provided by the County of Los Angeles (County) Fire Department (Fire Department), included in **Appendix 5.15A** of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Regulatory Setting

(1) Federal Regulations

Nationally recognized response time targets for urban areas are 5 minutes for a basic life support unit (Engine Company) and 8 minutes for an advanced life support unit (paramedic squad).¹ Based on this guidance, as well as local conditions, the County Fire Department has established its own response time standards, discussed below.

(2) State Regulations

(a) California Code of Regulations

The California Building Standards Code (California Code of Regulations [CCR], Title 24) is a compilation of building and safety standards, including fire safety standards for new buildings provided in the California Building Code (CCR, Title 24, Part 2) and the California Fire Code (CCR, Title 24, Part 9).² These standards apply to all occupancies in California, except where state agencies and local governing bodies adopt more stringent standards.

¹ Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.

² Building Standards Commission, Building Standards Information Bulletin 13-03, July 1, 2013, www.documents.dgs.ca.gov/bsc/cd_qustns/documents/2013/BSC-BULLETIN-13-03-Final.pdf, accessed March 10, 2015.

The Los Angeles County Code (County Code), discussed further below, incorporates by reference specific fire safety regulations from the Building Standards Code with local amendments.

The California Building Code includes several chapters relevant to fire safety and protection which address types of construction, fire and smoke protection features, construction materials and methods, and rooftop construction. Typical California Fire Code safety requirements include: fire sprinklers in all high-rise buildings; fire resistance standards for fire doors, building materials, and particular types of construction; debris and vegetation clearance within a prescribed distance from occupied structures within wildfire hazard areas; and fire flow requirements, fire hydrant spacing, and access road specifications.

In addition, CCR Title 19 addresses public safety and includes State Fire Marshal requirements (CCR, Title 19, Division 1), which incorporate general fire and safety standards regarding fire department access and egress, fire alarms, emergency planning, and evacuation procedures.

(b) California Department of Forestry and Fire Protection and Fire Hazard Severity Zones

The California Department of Forestry and Fire Protection (CAL FIRE) is responsible for the fire protection and stewardship of over 31 million acres of privately owned California wildlands.³ The CAL FIRE Director's responsibilities include identifying very high fire hazard severity zones, transmitting that information to local agencies, and periodically reviewing the recommendations.⁴

CAL FIRE is required by law to map areas of significant fire hazards based on vegetative fuels, terrain, weather, and other relevant factors.⁵ Areas at risk of wildland fire losses are referred to as Fire Hazard Severity Zones and fall into three categories: Moderate, High, and Very High (formerly known as Fire Zone 4).⁶ The Fire Hazard Severity Zones reflect variations in fire behavior and exposure and are used to develop

³ *California Department of Forestry and Fire Protection (CAL FIRE), About CAL FIRE, <http://calfire.ca.gov/about/about.php>, accessed March 10, 2015.*

⁴ *California Government Code, Sections 51178, 51178.5, and 51181.*

⁵ *California Department of Forestry and Fire Protection, Fire Hazard Severity Zone Re-Mapping Project, <http://frap.fire.ca.gov/projects/hazard/fhz.php>, accessed March 10, 2015.*

⁶ *Electronic correspondence, J. Lopez, Acting Assistant Chief, Forestry Division, County of Los Angeles Fire Department, December 10, 2013.*

permanent engineering mitigations associated with structural construction. The State Fire Marshal developed minimum statewide building construction regulations (contained in CCR, Title 24, Part 2, Chapter 7A) that, when used in conjunction with hazardous vegetation management, are designed to reduce statewide losses from disastrous wildfires. State and local government enforcement agencies are responsible for the application of these (or more restrictive) regulations when a building construction permit is issued. With limited exceptions, the same wildfire protection, building construction and defensible space regulations apply to all Fire Hazard Severity Zones.

County areas include proposed Fire Hazard Severity Zone Maps for State Responsibility Area lands and separate draft Very High Fire Hazard Severity Zone maps for Local Responsibility Area lands.⁷ The purpose of the Local Responsibility Area recommendations is to classify areas based on whether a very high fire hazard severity is present so that public officials may identify measures to mitigate the rate of spread and reduce the intensity of uncontrolled fires that threaten to destroy resources, life, or property, and require that those measures be taken.⁸ CAL FIRE staff assists local agencies in the review of these recommendations.

(c) California Fire Plan

The California Fire Plan is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE outlining goals critical to reducing and preventing fire impacts, which revolve around suppression and fire prevention efforts.⁹ The major components of the California Fire Plan goals are:¹⁰

- Improved availability and use of information on hazard and risk assessment;
- Land use planning: including general plans, new development, and existing developments;

⁷ California Department of Forestry and Fire Protection, *California Fire Hazard Severity Zone Map Update Project*, www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps.php, accessed March 10, 2015.

⁸ California Department of Forestry and Fire Protection, *Wildland Hazard & Building Codes*, www.fire.ca.gov/fire_prevention/fire_prevention_wildland.php, accessed March 10, 2015.

⁹ California Department of Forestry and Fire Protection, *California Fire Plan*, http://cdfdata.fire.ca.gov/fire_er/fpp_planning_cafireplan, accessed March 10, 2015.

¹⁰ California Department of Forestry and Fire Protection, *California Fire Plan, Executive Summary*, <http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf692.pdf>, accessed March 10, 2015.

- Shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans;
- Establishing fire resistance in assets at risk, such as homes and neighborhoods;
- Shared vision among multiple fire protection jurisdictions and agencies;
- Levels of fire suppression and related services; and
- Post fire recovery.

(d) Standardized Emergency Management System Regulations

The Standardized Emergency Management System (Emergency System) regulations are described in CCR, Title 19, Division 2, Chapter 1. The Emergency System is required by the California Emergency Services Act for managing multiagency and multijurisdictional responses to emergencies in California and coordinating among all levels of government and affected agencies.¹¹ The system unifies all elements of California's emergency management community into a single integrated system and standardizes key elements. As required by state law, both the County and the City of Santa Clarita (City) have adopted the Emergency System.¹² The Emergency System establishes organizational levels for managing emergencies, standardized emergency management methods, and standardized training for responders and managers. When fully activated, Emergency System activities occur at five levels: field response, local government, operational areas (Countywide), Mutual Aid Regions, and at the state level.

(3) County Regulations

(a) County of Los Angeles General Plan

As discussed in more detail in **Section 5.11**, Land Use and Planning, of this Draft EIR, the County's General Plan directs future growth and development in the County's unincorporated areas and establishes goals, policies, and objectives that pertain to the entire County. The current General Plan, adopted in 1980, includes a Safety Element that addresses fire hazards in the County and includes relevant policies that focus on the coordination of fire fighting efforts and the reduction of fire hazards.

¹¹ Governor's Office of Emergency Services, *Standardized Emergency Management System*, www.calema.ca.gov/PlanningandPreparedness/Pages/Standardized-Emergency-Management-System.aspx, accessed March 10, 2015.

¹² County of Los Angeles Department of Regional Planning, *Santa Clarita Valley Area Plan Update: One Valley One Vision 2012, Safety Element*

As also discussed further in **Section 5.11**, Land Use and Planning, the County circulated a draft General Plan update, entitled Los Angeles County General Plan 2035 (Draft General Plan), in January 2014 and a Draft EIR addressing the Draft General Plan in June 2014. This Draft General Plan contains a new Safety Element that includes a section on Fire Hazards with a stated goal of an effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.

The General Plan policy consistency analysis provided in **Section 5.11**, Land Use and Planning, of this Draft EIR, indicates the Project would be consistent with relevant General Plan polices related to fire protection.

(b) Santa Clarita Valley Area Plan: One Valley One Vision 2012

As discussed in greater detail in **Section 5.11**, Land Use and Planning, of this Draft EIR, the recently updated Santa Clarita Valley Area Plan: One Valley One Vision 2012 (Area Plan) serves as a long-term guide for development in the Santa Clarita Valley (Valley) over the next 20 years and ensures consistency between the General Plans of the County and the City in order to achieve common goals. The Area Plan encourages the coordination of land use plans with public services and other departments or agencies. It also incorporates the findings of a 2006 study that determined there are insufficient fire stations in the Valley to maintain desired service levels and the coverage areas are too large for the existing stations to meet target response times. In addition, the Area Plan references fire impact fees adopted by the County to fund new fire station construction and capital fire equipment purchases within the planning area. Funding is also provided by the County and City through property tax revenue, as well as a special tax approved by voters in 1997 to pay for essential fire suppression and emergency medical services. The Area Plan includes relevant policies that focus on the identification of areas prone to wildland fire hazards and measures to prevent the loss of life and property from wildland fires.

The Area Plan policy consistency analysis provided in **Section 5.11**, Land Use and Planning, of this Draft EIR, indicates the Project would be consistent with applicable Area Plan polices related to fire protection.

(c) County Development Monitoring System

The County General Plan includes provisions known as the Development Monitoring System (DMS) to give the County planning agency—the Regional Planning Commission and/or Department of Regional Planning (collectively referred to herein as the County Planning Agency)—information about the existing capacity of available specified public services in the four major Urban Expansion Areas of the General Plan (Antelope Valley, Santa Clarita Valley (which includes the Project Site), Malibu/Santa Monica Mountains, and

East San Gabriel Valley).¹³ The primary purpose of the DMS is to ensure that new development in Urban Expansion Areas will occur in a manner consistent with stated DMS policies and will pay for the expansion costs that it generates. To accomplish this purpose, the DMS is used to determine the availability of certain public services, including fire protection services, on an individual and cumulative basis; analyze the expansion costs to certain public service providers; and work towards ensuring that the expansion costs of new development are paid for by that development. For further information with regard to the DMS, please see **Section 4.1**, Environmental and Regulatory Setting, of this Draft EIR.

(i) Project Subject to DMS

The Project is located within the Santa Clarita Valley, an Urban Expansion Area within the DMS, and includes a subdivision map application (Vesting Tentative Tract Map (VTTM) 53295). Therefore, the Project is subject to a County DMS analysis or its equivalent.

(ii) DMS Infrastructure/Service Provisions

The Project's Initial Study, included as **Appendix 1A** of this Draft EIR, provided general information concerning available fire protection services and determined that an EIR would be required. Data from the Fire Department is summarized herein and provides up-to-date service and facility information.

(iii) DMS Access Provisions

As stated above, the DMS includes analysis of the access factors associated with a development project in an Urban Expansion Area. Under the DMS, where applicable, a project must be located within reasonable proximity to commercial development and job opportunities (generally within 5 miles) and served by an acceptable level of road service (including associated public transit). If it is determined that the project is not located in proximity to commercial and employment facilities, mitigation measures set forth in the DMS must be considered and applied prior to any approval of the project.

As applied, the Project satisfies the DMS access requirements because the Project Site is located nearly adjacent to Six Flags Magic Mountain, within 0.25 mile from Castaic Junction and Valencia Commerce Center, and approximately 0.25 mile from Valencia Industrial Park. All of these existing development areas are served by County or other public services and provide substantial commercial services and job opportunities.

¹³ See *Resolution of the Board of Supervisors of the County of Los Angeles Relating to Plan Amendment Case No. SP 86-173, adopted on April 21, 1987.*

(iv) DMS Data and Criteria

The DMS scenario would entail buildout of the near-term subdivision projects listed in the DMS plus the Project. However, for purposes of this analysis, this EIR relies on data provided by the Fire Department which are used as the equivalent of a DMS buildout scenario because:

- (1) The data are provided by the Fire Department, which is the “service provider” for fire protection services in the Project vicinity and provides the County with fire service and facility data as referenced in the DMS;
- (2) The data are considered current and the best available information from the Fire Department;
- (3) The data provide service and facility information, and County staff considers the information to be equivalent to the data called for in the DMS as it relates to fire protection services;
- (4) The data encompasses a broader cumulative development scenario than is provided by the DMS data. This more conservative approach ensures that all cumulative demand for fire protection services within the Valley is accounted for when assessing service capacity for the broader service area of the Fire Department.

As it relates to fire protection services, the DMS criteria provide that the County Planning Agency must determine if a project will be provided with an acceptable level of fire protection service and must base its determination upon the following data:

- (1) The location of existing fire station sites and the criteria for maximum safe distances; and
- (2) The estimated expansion cost of future construction.

The DMS also requires the County Planning Agency to determine whether or not a proposed project will have a significant environmental impact with regards to fire hazards. Applying its location factors, the DMS requires application of existing County regulations (e.g., County Fire Code, discussed below) to reduce potential fire hazard impacts.

(d) Los Angeles County Fire Code and Building Code

The Los Angeles County Fire Code (County Fire Code) (County Code, Title 32) and Building Code (County Building Code) (County Code, Title 26) establish standards for the

construction, design, and distribution of fire suppression facilities. The requirements address such issues as fire flow, minimum distance to fire stations, and public and private fire hydrants. In addition, fire prevention issues addressed in the County Fire Code include the provision of access roads, adequate road widths, and clearance of brush around structures located in hillside areas that are considered wildland fire risk areas. In order to comply with the County Codes, new development within high fire hazard areas must show proof through certification with the Fire Department that new development is located within a designated distance of a water source, such as water supply tanks or retention basins for emergency firefighting purposes. Furthermore, the County Water Code (County Code, Title 20, Division 1) specifies that water storage facilities be placed in a manner that ensures gravity emergency fire flow in the event power lines are damaged.

With respect to fire flows, water pressure, and hydrant spacing, the County Fire Code requirements vary based on land use, building size, density, and terrain. Accordingly, the Fire Department's Land Development Unit has set requirements for the Project as follows:

- The minimum fire flow for the Project's single-family residential areas is 1,250 gallons per minute (gpm) at 20 pounds per square inch (psi) residual pressure for a two-hour duration.
- The maximum fire flow for all other types of development (i.e., multi-family residential, commercial, and institutional) within the Project Site is 8,000 gpm at 20 psi residual pressure for a four-hour duration.
- The actual fire flow for each type of development will be based on the total square footage of the structure(s) and the type(s) of construction.
- A reduction in required fire flow will be allowed if the structure(s) is equipped with an approved automatic fire sprinkler system; however, the resulting fire flow cannot be less than 2,000 gpm.
- The required fire hydrant spacing is 600 feet apart in the single-family areas and 300 feet apart elsewhere in the Project Site.¹⁴

As discussed in more detail below, the Fire Department (in collaboration with CAL FIRE) has designated the Project Site as a Very High Fire Hazard Severity Zone, which renders it subject to additional County Fire Code regulations. Specifically, the Project Applicant is required to prepare a fuel modification plan, consisting of a set of scaled plans

¹⁴ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

that includes a plot plan showing fuel modification zone(s) indicated with applicable assessment notes, a detailed landscape plan, and an irrigation plan, in accordance with the County Fire Department's Fuel Modification Plan Guidelines. The fuel modification plan must be submitted to the Fire Department's Forestry Division for review and approval prior to the issuance of building permits. A fuel modification zone is a specific area where vegetation has been removed, planted, or modified to increase the likelihood a structure will survive a wildfire; to improve defensible space around that structure needed for firefighting activities; and to prevent direct flame contact with structures. Vegetation includes native and ornamental plants, non-native naturalized annual grasses, and other invasive or naturalized species that have been modified and/or partially or totally replaced with adequately spaced drought-tolerant and fire-resistant species, and thinning of existing native or ornamental species. Fuel modification zones are designed to protect structures from wildfire by limiting and reducing the amount of fuel available for a wildfire. These zones are put in place to identify the required vegetation removal and thinning on the site and act as a guide for any currently planned or future landscaping.

Furthermore, based on County Fire Code requirements, the Project also must comply with applicable regulations related to specific fire and life safety requirements during construction, ingress/egress including specifications for streets and driveways, all weather access, access road maintenance, maximum allowable grades, turning radii, building access, fire sprinkler systems, and fire hydrant installations. Additionally, all access devices/gates shall meet requirements related to width, positioning, and type. Compliance with applicable requirements is determined through the Fire Department's fire exhibit approval process.

(e) County Fire Department Standards

In addition to County Fire Code and Building Code requirements, the Fire Department has established optimal response time standards to adequately meet the fire protection needs of the areas it protects. The current standards for response times are:¹⁵

- 5 minutes or less for response times for urban areas;
- 8 minutes or less for suburban areas; and
- 12 minutes or less for rural areas.

The Fire Department currently meets these standards.¹⁶

¹⁵ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

(f) Developer Fee Program

The County's fire facility Developer Fee Program (Fire Facility Fee) funds the purchase of station sites, the construction of new stations and facility improvements, and the funding of capital equipment.¹⁷ Effective February 1, 2015, the Fire Facility Fee is \$1.0574 per square foot of new construction (for all land uses), payable at the time of building permit issuance.¹⁸ The Fire Department's share of local property taxes and a voter-approved Special Tax fund staffing and operations.¹⁹ The Fire Facility Fee also allows for funding and land dedication in lieu of fees. Payment of the Fire Facility Fee obligation typically constitutes full mitigation for development impacts.²⁰ A credit can be applied toward unpaid Fire Facility Fee obligations for in-lieu or in-kind considerations.²¹ Every year, the Fire Department prepares a Five-Year Capital Plan that identifies anticipated facilities needed in urban expansion areas during a five-year planning horizon.²²

(4) Previously Adopted Plans and Mitigation

(a) Newhall Ranch RMDP/SCP and EIS/EIR

The Project Site is included in the project area for the Applicant's Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP), shown in **Figure 3-5**, RMDP/SCP Project Area, in **Section 3.0**, Project Description, of this Draft EIR, which covers certain aspects of resource management for the Project and other nearby developments. As discussed in greater detail in **Section 4.1**, Environmental and Regulatory Setting, the RMDP component of the Newhall Ranch RMDP/SCP project is a conservation, mitigation, and permitting plan for the long-term management of sensitive biological resources and development-related infrastructure in the River and tributary drainages within the 11,999-acre Newhall Ranch Specific Plan (Specific

¹⁶ *Electronic correspondence, Loretta Bagwell, Planning Analyst, Planning Division, County of Los Angeles Fire Department, December 6, 2013.*

¹⁷ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

¹⁸ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

¹⁹ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

²⁰ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

²¹ *Electronic correspondence, Loretta Bagwell, Planning Analyst, Planning Division, County of Los Angeles Fire Department, December 6, 2013.*

²² *Electronic correspondence, Loretta Bagwell, Planning Analyst, Planning Division, County of Los Angeles Fire Department, December 6, 2013.*

Plan) area and along the extension of Magic Mountain Parkway through the Project Site. The SCP component of the Newhall Ranch RMDP/SCP project is a conservation and management plan to permanently protect and manage a system of preserves designed to maximize the long-term persistence of the San Fernando Valley spineflower (*Chorizanthe parryi* ssp. *Fernandina*) (spineflower), a federal candidate and state-listed endangered plant species. The SCP encompasses the Specific Plan area, the Valencia Commerce Center planning area, and the Project Site, in order to conduct conservation planning and preserve design on the Project Applicant's land holdings in Los Angeles County that contain known spineflower populations.

The Newhall Ranch RMDP/SCP project was the subject of a joint Environmental Impact Statement/Environmental Impact Report (EIS/EIR) (SCH No. 2000011025) by the U.S. Army Corps of Engineers (Corps) and the California Department of Fish and Wildlife (CDFW).^{23,24} At the time CDFW certified the EIR portion of the EIS/EIR in December 2010, it also adopted the Mitigation Monitoring and Reporting Plan (MMRP) for the RMDP/SCP project. This regulatory plan, required under CEQA, describes the mitigation measures, monitoring, and/or reporting plan for the Newhall Ranch RMDP/SCP project (including the Entrada South Project Site). CDFW adopted mitigation measures to reduce potential impacts to fire protection resulting from implementation of the Newhall Ranch RMDP/SCP project (see Mitigation Measures (MMs) RMPD/SCP PH-7 and PH-14 in **Appendix 2A**).

b. Existing Conditions

(1) Fire Protection Facilities and Services

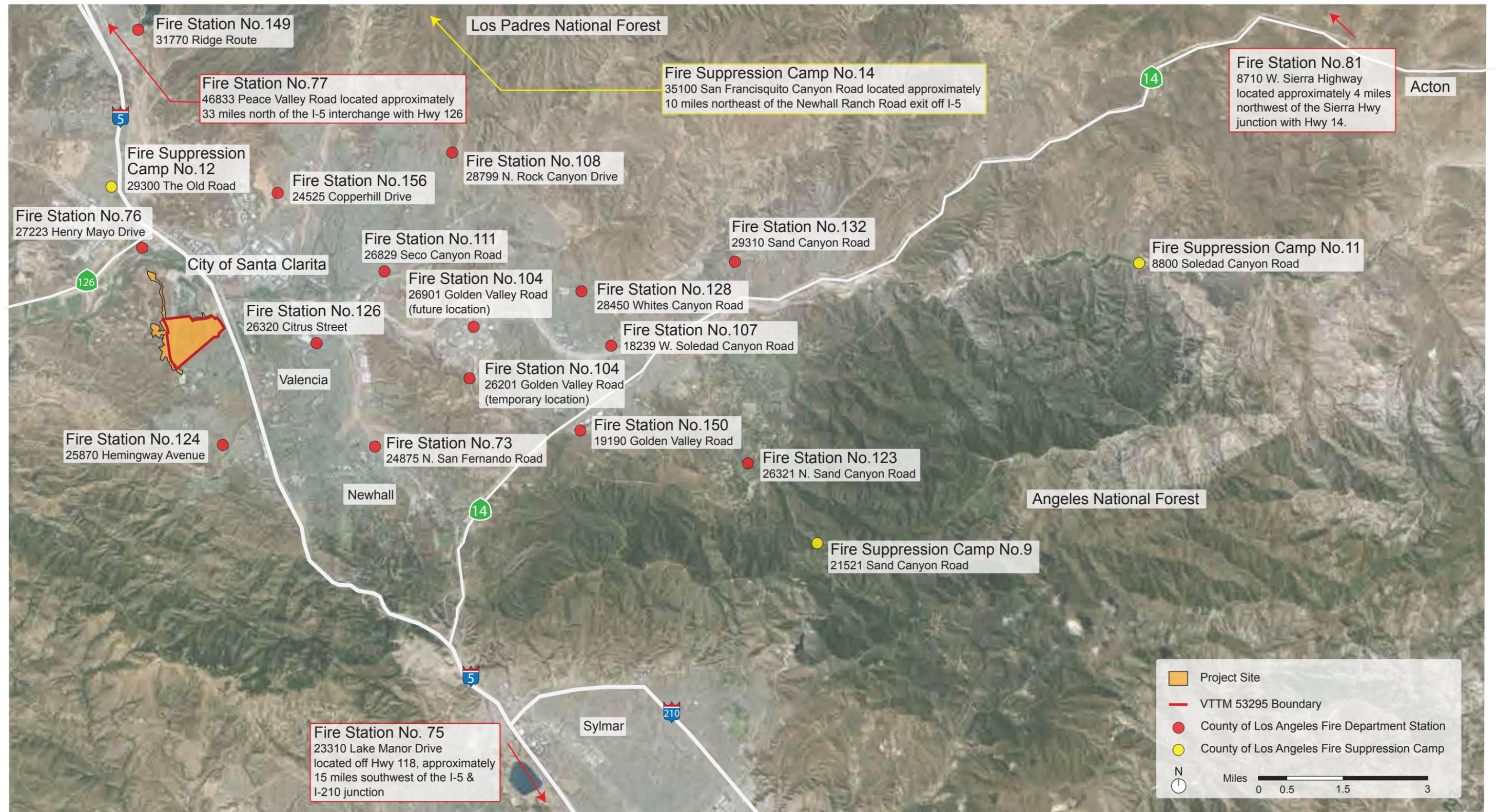
The County Fire Department provides fire prevention, fire protection, and emergency services to approximately 4.0 million residents in 58 incorporated cities and all of the unincorporated areas of Los Angeles County.²⁵ Battalions 6 and 22, which together consist of 17 fire stations and four fire camps, support the Valley.²⁶ As illustrated in **Figure 5.15-1**, Fire Stations Within the Project Area, on page 5.15-12 and discussed below, four of these fire stations are located within the Project vicinity.

²³ *Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, Final Joint Environmental Impact Statement and Environmental Impact Report, June 2010.*

²⁴ *The California Department of Fish and Game was officially renamed the California Department of Fish and Wildlife as of January 1, 2013.*

²⁵ *County of Los Angeles Fire Department, 2013 Statistical Summary, <http://www.fire.lacounty.gov/wp-content/uploads/2014/03/2013StatSummary.pdf>, accessed March 10, 2015.*

²⁶ *Specifically, Battalions 6 and 22 serve Agua Dulce, Canyon Country, Castaic, Chatsworth, Gorman, Newhall, Santa Clarita, Stevenson Ranch, and Valencia.*



Note: The Santa Clarita Valley is served by Battalions 6 and 22, which together consist of 17 fire stations (Fire Station Nos. 73, 75, 76, 77, 81, 104, 107, 108, 111, 123, 124, 126, 128, 132, 149, 150, and 156), and four fire camps.

(a) Fire Stations Within the Project Area

There are four existing County fire stations near the Project Site:

- Fire Station No. 124, located at 25870 Hemingway Avenue in Stevenson Ranch approximately 3.2 miles south of the Project Site, maintains a three-person engine company and a two-person paramedic squad.^{27,28}
- Fire Station No. 76, at 27223 Henry Mayo Drive in Valencia approximately 3.9 miles north of the Project Site, has one fire engine and four firefighters.
- Fire Station No. 126, located approximately 2.4 miles to the east at 26320 Citrus Avenue in Santa Clarita, maintains a three-person engine company and a four-person quint (engine/ladder) company and houses a deputy chief and battalion chief.²⁹
- Fire Station No. 156, located approximately 3.2 miles to the northeast at 24525 Copperhill Drive in Santa Clarita, maintains a four-person engine company.

However, the Fire Department employs a regional approach to providing fire protection and emergency medical services wherein emergency response units are dispatched as needed to an incident anywhere in the Fire Department's service territory based on distance and availability without regard to jurisdictional or municipal boundaries. Should a significant incident occur on-site, the resources of the entire County Fire Department, not just the nearest stations, could serve the Project Site.³⁰

(b) Fire Station Upgrades

There are no plans to upgrade the fire stations in the Project vicinity. However, within the greater Valley area, Fire Station No. 104 is currently housed in a temporary facility. A permanent location will be developed beginning in 2016 and is expected to

²⁷ Distances herein are measured to the extension of Magic Mountain Parkway, located within the Project Site.

²⁸ A three-person engine company consists of a captain, a fire fighter specialist, and a fire fighter. For paramedic squads, a fire fighter/paramedic fills the fire fighter position.

²⁹ A quint is a combination engine/ladder truck apparatus. A four-person company consists of a captain, a fire fighter specialist, and two fire fighters.

³⁰ Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.

become operational during 2017 or 2018.³¹ Permanent Fire Station No. 104 will be located at 26901 Golden Valley Road.

In addition, two future fire stations must ultimately be developed within the Newhall Ranch Specific Plan area, located west of the Project Site. In accordance with MM SP 4.18-4 set forth in the MMRP for the Specific Plan, provided in **Appendix 2G** of this Draft EIR, the Specific Plan projects will dedicate and fund two fire station sites within the Specific Plan area and fund a third at the Del Valle Training Facility. Specifically, one future fire station will be located within Mission Village on Westridge Parkway south of Magic Mountain Parkway (adjacent to the Project Site), and the other future fire station will be located within Landmark Village at the southwest corner of Long Canyon Road and A Street.^{32,33} Given the Fire Department's regional approach to providing fire protection and emergency medical services without regard to jurisdictional or municipal boundaries, these stations will be available to respond to incidents throughout the Valley, including at the Project Site, once operational. Furthermore, in consultation with the Fire Department, two additional fire stations are proposed in Legacy Village and Potrero Village to serve the Project area. As the Applicant would fund the construction of these new stations per agreement with the Fire Department, the estimated expansion cost to the County would be limited.

(c) Fire Suppression Camps

The Fire Department's resources also include fire suppression camps, which supply additional crews for wildland fire suppression, storm-related functions, and search and rescue operations. A partnership with the California Department of Corrections provides the Fire Department with a large labor pool. The closest fire suppression camp to the Project Site is at 29300 The Old Road in Castaic.³⁴

(2) Emergency Access and Response Times

The Fire Department does not calculate service-to-population ratios, as it has determined that such ratios do not properly reflect the need for fire protection and emergency medical services. Specifically, such ratios do not account for demand caused

³¹ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

³² *Mission Village Draft EIR, Section 1.0: Project Description, October 2010, p. 1.0-13.*

³³ *Landmark Village Recirculated Draft EIR, Section 1.0: Project Description, January 2010, p. 1.0-36.*

³⁴ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

by non-residential structures, vehicular incidents, transient population, and vacant land with combustible vegetation. Jurisdictional boundaries for the Fire Department are based on several factors, such as road networks, response times, and personal knowledge of the area. The Fire Department operates under a regional concept in its approach to providing fire protection and emergency medical services, wherein emergency response units are dispatched as needed to an incident anywhere in the Fire Department's service territory based on distance and availability, without regard to jurisdictional or municipal boundaries.

The main access routes between any given fire station and a development site depend upon the location and type of fire personnel and/or equipment needed, road closures, and other road conditions at the time an emergency call is received. With respect to the Project, emergency response vehicles would generally be expected to access the Project Site via Interstate 5 or The Old Road, located just east of the Project Site. Internal circulation within the existing Project Site is provided via access roads associated with the abandoned oil wells on-site. In addition, an existing fire access road meanders across the southern portion of the Project Site, primarily within the Southern California Edison (SCE) electrical transmission corridor and into a portion of the adjacent Westridge community, extending from The Old Road west to the current terminus of Westridge Parkway.

Based on the distances of Fire Station Nos. 76 and 124 from the Project Site and general roadway/access conditions, response times to the Project Site currently range from approximately 5 to 8 minutes.³⁵ Land uses in the Valley vary greatly from urbanized and suburban clusters to vast rural areas of wilderness. This varied urbanization results in average response times that range from 5 minutes for urban areas to 8 minutes for suburban areas and 12 minutes for rural areas, in accordance with the Fire Department's response time standards. Portions of the Project Site are classified by the Fire Department as urban and suburban.³⁶

(3) Wildland Fire Hazard Potential

Due to unique fuel (vegetation), terrain, and climatic conditions, brush fires are a major threat to life and property throughout the southern California region. The risk of wildfire hazard is especially increased when the dry Santa Ana winds arrive, usually in the fall and winter seasons. The desert blown Santa Ana winds dry out vegetation and can spread localized fires quickly. Areas in the County that are susceptible to wildfires include

³⁵ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

³⁶ *Telephone correspondence, Loretta Bagwell, Planning Analyst, Planning Division, County of Los Angeles Fire Department, April 18, 2014.*

areas that lie within the urban/wildland interface. As previously discussed, the County Fire Department (in collaboration with CAL FIRE) has designated the Project Site as a Very High Fire Hazard Severity Zone.³⁷

(4) Project Site

The Project Site is generally comprised of vacant land, some agricultural uses, a small plant nursery used by the adjacent Six Flags Magic Mountain, and abandoned oil wells and associated access roads. As previously discussed, an existing fire access road meanders across the southern portion of the Project Site, primarily within the SCE electrical transmission corridor and into a portion of the adjacent Westridge community. The topography of the Project Site varies in elevations and features. The northern portion of the Project Site (which includes some proposed External Map Improvements) consists of relatively flat land, while the central and southern portions consist of gently sloping and steeply sloping hills and canyons. Elevations across the Project Site range from approximately 1,100 to 1,400 feet above mean sea level. Vegetation communities within the Project Site include California sagebrush scrub, California sagebrush–California buckwheat scrub, California annual grassland, undifferentiated chaparral scrubs, Valley oak forest and woodland, and various riparian/wetland communities (e.g., Big sagebrush scrub, riverwash), in addition to disturbed land, a limited amount of developed land, and land used for agricultural purposes. Please refer to **Section 5.4**, Biological Resources, of this Draft EIR for additional information on the existing flora on the Project Site.

Current calls for service to the largely vacant Project Site are rare. There were 442 calls for service in the Project vicinity between January 1, 2010 and September 18, 2013: 5 for fires, 384 for emergency medical incidents, and 53 for other types of incidents.³⁸

(5) County Development Monitoring System

The summary of existing conditions provided above responds to DMS criteria regarding fire protection. Specifically, information regarding the location of and distance to existing fire station sites responds to the DMS infrastructure criteria, information regarding future fire stations planned in the Project area responds to criteria regarding the estimated expansion cost of future construction, and the discussion of wildland fire hazard potential responds to the environmental criteria regarding high fire hazards.

³⁷ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

³⁸ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

3. ENVIRONMENTAL IMPACTS

a. Methodology

Fire service needs are determined based on the size of the service population and the geographic area served, the number and types of calls for service, and the characteristics of a project and its surrounding community. Impacts regarding fire services are evaluated by the Fire Department on a project-by-project basis, taking into account a project's land use(s), fire protection needs, design features that would reduce or increase the demand for fire protection services, and whether the project site meets the recommended response time requirements. Additionally, consideration is given to the project's fire flow requirements, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials on-site. Consultation with the Fire Department is conducted to accurately determine a project's effect on fire protection and emergency medical services.

b. Project Design Elements/Project Design Features

Project development includes 339 single-family residences, 1,235 multi-family residences, and 730,000 square feet of commercial uses anticipated to be comprised of approximately 435,000 square feet of office uses and approximately 295,000 square feet of commercial retail development. It also includes a 9.4-acre elementary school, a 27.2-acre Spineflower Preserve, a 5.6-acre public neighborhood park, two recreational centers totaling 2.9 acres, and 101.7 acres of open space.³⁹ The proposed uses would be developed within the 382.3-acre Vesting Tentative Tract Map No. 53295 (VTTM 53295), while supportive facilities and infrastructure, referred to as the External Map Improvements, would be constructed within the remaining 119.1 acres to the west and north. As discussed in **Section 5.14**, Population, Housing, and Employment, of this Draft EIR, the Project's population is estimated to include 5,288 residents and 2,679 employees.

During construction, a Project construction traffic management plan would address traffic and access.⁴⁰ This plan would ensure adequate emergency access to all nearby residences and businesses and would minimize traffic interference and construction vehicle travel on congested streets. If temporary lane closures are necessary for the installation of utilities, emergency access would be maintained at all times. Flag persons and/or detours

³⁹ *Open space acreage refers to lots within the tract map designated as open space. Additional open space areas, such as natural drainage courses, roadway medians, and landscaped parkways adjacent to on-site roadways, in addition to the proposed park, recreation centers, and Spineflower Preserve, bring the total open space area to approximately 153 acres.*

⁴⁰ *See PDF ES 5.20-1 in **Section 5.20**, Transportation/Traffic, of this Draft EIR for details.*

would also be provided as needed during construction activities to ensure safe traffic operations. Refer to **Section 5.20**, Transportation/Traffic, of this Draft EIR for further details regarding the construction traffic management plans. Furthermore, the Applicant would notify the Fire Department of any lane closures or other road construction and ensure that Fire Department access would remain clear and unobstructed.

Project construction managers and supervisory personnel would be trained in emergency response and fire safety operations. Fire suppression equipment specific to Project construction activities would be maintained on the construction site in accordance with Occupational Safety and Health Administration (OSHA) and County Fire Code requirements. Also per County Fire Department requirements, all required fire hydrants would be installed, tested, and accepted prior to building construction, and vehicular access to such hydrants would be maintained during construction. In addition, in compliance with County Code, the Project Applicant would pay the applicable Fire Facility Fee to the County. As previously discussed, these fees would fund the purchase of station sites, the construction of new stations and facility improvements, and the funding of capital equipment.⁴¹

The Project's design would comply with applicable County Code fire safety requirements regarding site design, site and building access, roadways and driveways, fire sprinkler systems, fire hydrants, and access gates, as well as other applicable Fire Code requirements. Compliance would be ensured via implementation of the following regulatory compliance measures:

- Per Fire Code Sections 105.4.2 and 105.7.10.1, the Applicant shall submit a fire exhibit that depicts detailed design requirements to the County Fire Department for review and approval prior to the recordation of the final map or the approval of a building permit.
- Per Fire Code Sections 404.3.2 and 408.7.5, following construction and prior to the issuance of the first certificate of occupancy, the Project Applicant shall submit an emergency response plan for approval by the County of Los Angeles Fire Department. The emergency response plan shall include, but not be limited to, the following: mapping of site access and emergency exits, evacuation routes for vehicles and pedestrians, and locations of the nearest hospitals and fire stations.

⁴¹ *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

Additionally, applicable requirements for the Very High Fire Hazard Severity Zone would be met via implementation of a fuel modification plan. Under the Project's preliminary fuel modification plan, provided in **Appendix 5.15B** to this Draft EIR, which was prepared in accordance with the County Fire Department's Fuel Modification Plan Guidelines and approved by the County Fire Department's Forestry Division on April 3, 2015, three zones would be established on-site to provide adequate defensible space in a fire environment, summarized as follows:

- **Zone A—Setback Zone:** This zone extends a minimum of 30 feet from single-family homes located adjacent to open space, or 20 feet from any other proposed combustible structure located adjacent to irrigated internal areas. Landscaping and vegetation would consist primarily of green lawns, groundcovers not exceeding six inches in height, and adequately spaced shrubs, dwarf varieties, or mature trees small in stature. Selected plant species would be inherently highly fire resistant and spaced appropriately, consistent with the County Fire Department's *Fuel Modification Plant List*; other species may be utilized subject to approval. Target tree species would not be permitted within 30 feet of combustible structures and require removal. Vines and climbing plants shall not be allowed on such structures. Automatic or manual irrigation shall be provided to landscaping to maintain healthy vegetation and fire resistance.
- **Zone B—Irrigated Zone:** This zone extends from the edge of Zone A to 100 feet from proposed structures (or as noted on plans). Landscaping and vegetation would consist primarily of green lawns, groundcovers, and adequately spaced shrubs and trees, modified existing native plants, or both. Selected plant species would be fire resistant and spaced appropriately, consistent with the County Fire Department's *Fuel Modification Plant List*, unless otherwise approved. Ground covers shall be maintained at a height not to exceed 6 inches in Zones A and B. Ground covers on slopes may be 12 inches in Zone B within 50 feet of a structure and 18 inches beyond 50 feet. Annual grasses and weeds shall be maintained at a height not to exceed 3 inches, and native and ornamental plants would be permitted so long as adequate defensible space is provided. Replacement landscape planting with ornamental or native species is permitted to meet minimum slope coverage requirements of County agencies or other landscape or hillside ordinances. Trees at maturity may not overhang any structure or Fire Department access. Automatic or manual irrigation shall be provided to landscaping to maintain healthy vegetation and fire resistance but would not be required if the zone consists entirely of native plants.
- **Zone C—Native Brush Thinning Zone:** This zone extends from the edge of Zone B (i.e., 100 feet) up to 200 feet from proposed structures (or as noted on plans). Vegetation may include existing native plants, adequately spaced ornamental trees and shrubs, or both. Replacement landscape planting with ornamental or native species is permitted to meet minimum slope coverage requirements of County agencies or other landscape or hillside ordinances. General spacing

would be: 15 feet between canopies for existing native shrubs or groups of shrubs and may be thinned by reduced amounts as the distance from development increases; and 30 feet between canopies for existing native trees or groups of trees, and the distance may increase or decrease depending on the slope, arrangement of the trees in relation to slope, and the species of trees. Existing native vegetation would be modified by thinning and removal of any species that presents a fire risk in accordance with the *Fuel Modification Plant List* (e.g., chamise, sage, sage brush, and buckwheat). Required thinning and clearance would be determined at the time of inspection. ;Required clearance may increase to the maximum allowed by the Fire Code as needed because of vegetation growth. Grasses and weeds would be maintained at a maximum height of three inches. Irrigation would not be required if the zone consists entirely of native plants.

These zones would be created primarily along the southern, southeastern, and southwestern edges of proposed development (i.e., within or near the SCE electrical transmission corridor), as well as along the interior perimeter of the proposed Spineflower Preserve. In other areas of the Project Site (e.g., adjacent to internal roadways, commercial Planning Area perimeters, and private single-family backyards), fuel modification would be the responsibility of Home Owner Associations (or other Master Associations) and/or home owners, as applicable, in accordance with the County Fire Department's Fuel Modification Plan Guidelines. Property owners within the Project Site would be responsible for the long-term maintenance of the fuel modification plan, subject to a Fuel Modification Covenant.

A Fire Access Road Zone also would be implemented and would extend 10 feet from the edge of any roadway that may be used for Fire Department access. Landscaping and native plants within this zone would be appropriately spaced and maintained to provide safe ingress/egress. This zone would require the clearance and removal of any flammable plant growth, and proposed trees would be planted outside the 10-foot clearance zone. In accordance with the Fire Code, all fire access roads would have a minimum 20-foot width with unobstructed vertical clearance (Fire Code Section 325.10), and all fire access roads, driveways, and turnarounds would be maintained (Fire Code Section 503.2.1).

One of the primary goals of the fuel modification plan and associated landscaping and irrigation is to provide adequate defensible space around all structures within a Fire Hazard Severity Zone. Accordingly, routine landscape maintenance would be required per the County Fire Department's Fuel Modification Plan Guidelines. Specifically, the following would be performed: removal or thinning of undesirable combustible vegetation and removal of dead or dying landscaping; pruning and thinning to reduce the overall fuel loads and fuel continuity; specific pruning measures for shrubs and trees; maintenance of ground covers with specified height limits; removal of accumulated plant litter, dead wood, debris,

and trimmings, with the latter permitted to be chipped and evenly distributed in the same location; invasive plant removal; and regular maintenance and evaluation of all irrigation systems. All plantings would be in accordance with the Fuel Modification Plan Guidelines and would require Fire Department approval. More specifically, fuel modification/landscape plans for each lot within the Project Site would be identified in the Covenants, Conditions, and Restrictions and submitted for approval prior to installation. Compliance with the Fire Code is a year-round responsibility. Enforcement would occur following inspections by the County Fire Department. In addition, the County Fire Department would conduct annual inspections for brush clearance code compliance between April and June (depending on geographic region). Inspections for compliance with an approved Fuel Modification Plan may occur at any time of the year.

The Project also would comply with applicable fire flow and hydrant requirements, detailed above in subsection 2.a.(3)(d), Los Angeles County Fire Code and Building Code. As discussed in more detail in **Section 5.21**, Utilities and Service Systems—Water Supply and Service, of this Draft EIR, the Valencia Water Company would provide water to the Project Site via an on-site distribution system (depicted in **Figure 3-17**, Project Potable Water System, in **Section 3.0**, Project Description), which would connect to a new 4.0-million-gallon reservoir tank proposed in the southwest corner of the Project Site adjacent to Westridge Parkway.

Additionally, the following Project design features (PDFs) have been incorporated into the Entrada South (ES) Project's design and will be included in the MMRP to ensure implementation.

PDF ES 5.15-1: All Project construction managers and supervisory personnel shall be trained in emergency response and fire safety operations and a log documenting such training shall be made available for inspection upon request by the County of Los Angeles Fire Department and County of Los Angeles Department of Regional Planning.

PDF ES 5.15-2: The Applicant shall notify the County of Los Angeles Fire Department at least five days prior to any Project-related lane closures or other road construction and ensure that emergency access remains clear and unobstructed.

PDF ES 5.15-3: All potentially gated entrances to Planning Areas 4 through 7 shall incorporate a Knox-Box entry system or equivalent according to County of Los Angeles Fire Department requirements.

c. Significance Thresholds

Based on Appendix G of the CEQA Guidelines and other relevant criteria, the Los Angeles County Department of Regional Planning has determined that a project could have a potentially significant impact related to fire protection based on the following criteria:

Threshold 5.15-1: Would the Project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios or other performance objectives for fire protection?

Threshold 5.15-2: Would the Project expose people or structures to a significant risk of loss, injury or death involving fires, because the Project is located:

- Within a Very High Fire Hazard Severity Zone (Zone 4)?
- Within a high fire hazard area with inadequate access?
- Within an area with inadequate water and pressure to meet fire flow standards?
- Within proximity to land uses that have the potential for dangerous fire hazard?

Threshold 5.15-3: Does the proposed use constitute a potentially dangerous fire hazard?

Threshold 5.15-4: Does the Project Site have more than 75 dwelling units on a single access in a high fire hazard area?

As discussed in the Initial Study prepared for the Project, provided in **Appendix 1A** of this Draft EIR, the Project would not include any uses that are considered to present a potentially dangerous fire hazard, nor would it have streets with more than 75 dwelling units located along a single access. Thus, no further discussion of Thresholds 5.15-3 and 5.15-4 is necessary.

d. Project Impacts

Threshold 5.15-1: Would the Project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios or other performance objectives for fire protection?

(1) Construction

The demand for fire protection and emergency medical services may be increased during Project construction, as construction activities could potentially expose combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to sources of ignition (e.g., machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings, lighted cigarettes). Additionally, certain construction activities have the potential to increase the risk of fire, such as the use of mechanical equipment in vegetated areas, cutting and grinding metal, welding, and the storage of flammable materials such as fuel, wood, and other building materials.

A large amount of wood framing would occur on the Project Site during construction. In association with the wood framing operations, the Project's electrical, plumbing, communications, and ventilation systems would be properly installed in each structure. Installation would be subject to County Code and inspection by County personnel prior to drywalling.

In addition, per PDF ES 5.15-1, construction managers and supervisory personnel would be trained in emergency response and fire safety operations, as mandated by OSHA and County Fire Code and Building Code requirements. These requirements include such practices as monitoring and managing life safety systems and facilities, and maintaining fire suppression equipment (e.g., fire extinguishers) on-site. Furthermore, in compliance with County Fire Code requirements, adequate fire hydrants would be available for use throughout the Project Site during construction.

With such measures in place and compliance with Code requirements, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also would result in increased traffic on nearby roadways during working hours in association with commuting construction workers, delivery trucks, and other large construction vehicles. Slow-moving construction-related traffic on I-5, SR-126, The Old Road, and other roadways could reduce optimal traffic flows and potentially delay emergency vehicles traveling through the area. In addition, temporary lane closures associated with utility line construction or roadway improvements could slow or impede emergency access. However, implementation of the proposed construction traffic management plan, detailed in PDF ES 5.20-1 in **Section 5.20**, Transportation/Traffic, of this Draft EIR, would ensure adequate emergency access to all nearby residences and businesses and would minimize traffic interference and construction vehicle travel on congested streets. As part of this measure, flag persons and/or detours would be provided as needed during construction activities to ensure safe traffic operations. Furthermore, in

accordance with PDF ES 5.15-2, the Project Applicant would notify the Fire Department of any lane closures or other road construction to facilitate their response.

With implementation of these measures, impacts to emergency access would be less than significant during Project construction.

(2) Operation

As previously discussed, the Project would generate an estimated 5,288 residents and 2,679 jobs on-site. This daytime population of 7,988 persons would increase the demands placed on the Fire Department's protection and emergency medical services. The proposed uses would be expected to generate a typical range of fire service calls similar to other such uses, including kitchen/house fires, garbage bin fires, car fires, electrical fires, etc. These types of fires would be adequately suppressed with the types of fire equipment found at County's fire stations. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site.

The adequacy of fire protection for a given area is typically based on response times from existing fire stations and required fire flows, as well as the County Fire Department's judgment for needs in the area. Emergency response times throughout the Valley average 5 minutes for urban areas and 8 minutes for suburban areas, thus meeting response time standards. Even with growth through 2024 (i.e., the Project buildout year), the Project would not, in and of itself, require new or physically altered Fire Department facilities. As previously indicated, the proposed water system would provide sufficient fire flows and meet fire hydrant requirements. In addition, an extensive list of fire safety features would be incorporated into the Project design, including a fuel modification plan, to ensure adequate fire safety within the Project Site. Further, implementation of the regulatory compliance measures previously discussed would ensure that the Project Applicant would submit an emergency response plan for approval by the Fire Department. As well, emergency access would be maintained on-site in accordance with Fire Code requirements, and per PDF ES 5.15-3, all potentially gated entrances to Planning Areas 4 through 7 would incorporate a Knox-Box entry system (or equivalent) to ensure Fire Department access.

As previously discussed, the Project Applicant would pay the appropriate Fire Facility Fee to help fund future improvements as needed. With payment of the Fire Facility Fee combined with implementation of the regulatory compliance measures previously discussed and PDF ES 5.15-1 through PDF ES 5.15-3, as well as the increase in tax revenue attributable to the Project, impacts with respect to the creation of capacity or

service level problems or substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities for fire protection during Project operation would be less than significant.

It is also noted that the development of four future fire stations west of I-5 (within Mission Village, Landmark Village, Legacy Village, and Potrero Village), previously discussed, is intended to meet future demands for service associated with projects proposed in the Project area, including the Project. Once operational, the Fire Department's target response distance standard for the Project would be met. Further, emergency response from these fire stations to the Project Site are expected to meet response time standards.

(3) County Development Monitoring System

The analysis above responds to DMS criteria regarding fire protection. In particular, preparation and submittal of an emergency response plan for approval by the Fire Department would meet the DMS environmental criteria regarding emergency access. Similarly, compliance with the fire flow and hydrant requirements established for the Project by the Fire Department's Land Development Unit would meet the environmental criteria regarding fire flows. With respect to the cost for new fire facilities within the Project area, as previously discussed, the Applicant would fund the construction of four new stations per agreement with the Fire Department; thus, the estimated expansion cost to the County would be limited. Moreover, any additional costs incurred for further facility expansion or other improvements would be covered, at least in part, by the Fire Facility Fee to be paid by the Project Applicant. The County's fire facility Developer Fee Program is intended to fund the purchase of station sites, the construction of new stations and facility improvements, and the funding of capital equipment, and payment of the Fire Facility Fee obligation typically constitutes full mitigation for development impacts.⁴² Accordingly, payment of the fee is intended to help provide an acceptable level of fire protection service, thereby meeting DMS criteria. As such, the Project is consistent with DMS policies as they relate to fire protection.

Threshold 5.15-2: Would the Project expose people or structures to a significant risk of loss, injury or death involving fires, because the Project is located:

- Within a Very High Fire Hazard Severity Zone (Zone 4)?
- Within a high fire hazard area with inadequate access?

⁴² *Written correspondence, Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 18, 2013.*

- Within an area with inadequate water and pressure to meet fire flow standards?
- Within proximity to land uses that have the potential for dangerous fire hazard?

(1) Development Within a Very High Fire Hazard Severity Zone

As previously discussed, based on vegetative fuels, terrain, weather, and other relevant factors, the Project Site has been designated as a Very High Fire Hazard Severity Zone. With respect to fuels, much of the Project Site is currently vacant, with on-site vegetation communities including California sagebrush scrub, California sagebrush–California buckwheat scrub, California annual grassland, undifferentiated chaparral scrubs, Valley oak forest and woodland, and various riparian/wetland communities (e.g., Big sagebrush scrub, riverwash), in addition to disturbed land, a limited amount of developed land, and land used for agricultural purposes, as discussed in more detail in **Section 5.4**, Biological Resources, of this Draft EIR. The plant communities that make up this cover are highly combustible, particularly during dry summer months, and present a high fire hazard to development. Thus, the potential for wildland fire hazards would exist at the wildland/urban interface due to: (1) the presence of brush; (2) increased human activity; and (3) the potential for fires due to accidents or arson-related causes. The boundaries of the wildland/urban interface would change over time as the Project is built out.

With respect to terrain, as previously discussed, the topography of the Project Site varies, with elevations ranging from 1,100 to 1,400 feet above mean sea level. Topography is an issue relative to wildland fire hazards because steep slopes can be inaccessible to fire fighting vehicles, and steep canyons can create updraft conditions (similar to a chimney), allowing a fire to spread rapidly. Further, steep canyons densely covered with combustible vegetation are especially hazardous. As discussed in more detail in **Section 3.0**, Project Description, of this Draft EIR, substantial grading would occur to prepare development pads within VTTM 53295, and for roadway and utility construction within the External Map Improvements areas. Within the developed portions of the Project Site, finished grades would comply with Fire Department grade requirements in order to facilitate access for firefighting equipment.

Compliance with all applicable County Fire Code requirements related to fire protection in a Very High Fire Hazard Severity Zone, as well as other relevant fire safety regulations set forth by the County, would minimize wildfire hazards and associated impacts. In particular, implementation of the fuel modification plan described above, would create distinct fuel modification zones that provide for appropriate setbacks, landscaping, irrigation, and vegetation thinning so as to create adequate defensible space around all potentially combustible structures. Routine landscape maintenance would be conducted in

accordance with the Fire Department's Fuel Modification Plan Guidelines and would include pruning; removal of plant litter, dead plants, and unwanted species; and regular inspection and repair of the irrigation system. In addition, regular brush clearance would be conducted within the natural, undeveloped portions of the Project Site, as required.

Through compliance with applicable County Fire Code and other County requirements, as well as approval and implementation of the fuel modification plan, impacts with respect to development within a Very High Fire Hazard Severity Zone would be less than significant.

The above analysis is also consistent with DMS environmental criteria as it relates to fire hazards and protection. Specifically, the DMS analysis shows that impacts related to development within a high fire hazard area would be less than significant. Accordingly, the Project is consistent with DMS policies as they relate to fire hazards and protection.

(2) Access Within a High Fire Hazard Area

As it relates to emergency access, as previously discussed, a construction traffic management plan would be implemented as part of the Project to address traffic and access during construction.⁴³ Regional access to the Project Site would continue to be provided by I-5 and SR-126, with local access provided via The Old Road, Magic Mountain Parkway, and Westridge Parkway, the latter two of which would be extended as part of the Project. These extensions would provide dual access points for the Project Site to promote emergency response and evacuation.

As shown in **Figure 3-14**, Project Trails Plan, in **Section 3.0**, Project Description, of this Draft EIR, implementation of the Project circulation plan would provide an internal system of arterials, residential collectors, and private drives, which collectively would provide dual access to the different residential and commercial areas of the Project Site. Additionally, the existing segment of Magic Mountain Parkway between The Old Road and the entrance to Six Flags Magic Mountain would be removed, reconstructed, and widened to meet County standards, necessitating reconstruction of a portion of Media Center Drive and the Theme Park entrance. Upon completion of these improvements, appropriate access would be provided to and through the Project Site, as well as to any affected adjacent uses.

The proposed circulation system and associated improvements within the Project Site would be consistent with applicable County standards, including County Fire Code

⁴³ See PDF ES 5.20-1 in **Section 5.20**, *Transportation/Traffic*, of this Draft EIR for details.

requirements, regarding access, roadway and driveway widths, turning radii, length of single access streets, cul-de-sac dimensions, hydrant placement, street parking restrictions, etc. Compliance with such requirements would be ensured via the Fire Department's approval of the fire exhibit included in the required emergency response plan. Accordingly, impacts related to access within a high fire hazard area would be less than significant.

The above analysis is also consistent with County DMS environmental criteria as it relates to fire hazards and protection. Specifically, the DMS analysis shows that impacts related to emergency access would be less than significant. Accordingly, the Project is consistent with DMS policies as they relate to fire hazards and protection.

(3) Fire Flow Requirements

As discussed in more detail in **Section 5.21**, Utilities and Service Systems—Water Supply and Service, of this Draft EIR, the Valencia Water Company would provide water to the Project Site via an on-site distribution system (depicted in **Figure 3-17**, Project Potable Water System, in **Section 3.0**, Project Description), which would connect to a new 4.0-million-gallon reservoir tank proposed in the southwest corner of the Project Site adjacent to Westridge Parkway. As also discussed in **Section 5.21**, Utilities and Service Systems—Water Supply and Service, the Valencia Water Company has stated it can provide adequate fire flows, in addition to meeting domestic water supply demands, for the Project. As such, a long-term source of water is available and would be committed for the Project Site's development prior to the issuance of building permits. The Project would be located primarily within Valencia Water Company's Zone 2 and Zone 3 water pressure zones, as shown in **Figure 3-17**, Project Potable Water System. The portion of the Project Site lying within Valencia Water Company Zone 2 would be served by the existing 4.0-million-gallon reservoir tank and the proposed second 4.0-million-gallon reservoir tank. The portion of the Project Site lying within the Valencia Water Company Zone 3 would be served by an expanded booster station located next to the Zone 2 tanks. Therefore, water supply and pressure would be adequate to meet fire flow standards, and impacts would be less than significant.

The above analysis is also consistent with DMS environmental criteria as it relates to fire hazards and protection. Specifically, the DMS analysis shows that impacts related to fire flow requirements would be less than significant. Accordingly, the Project is consistent with DMS policies as they relate to fire hazards and protection.

(4) Proximity to Hazardous Land Uses

As discussed in more detail in **Section 3.0**, Project Description, of this Draft EIR, land uses surrounding the Project Site include Six Flags Magic Mountain to the north, the

communities of Westridge and proposed Legacy Village to the south and southwest, respectively, the City of Santa Clarita to the east across The Old Road and I-5, and currently vacant land within the Newhall Ranch Specific Plan area to the west. Within the Specific Plan area, the approved Mission Village community is planned immediately west of the Project Site. Of these uses, Six Flags Magic Mountain presents a minor potential for fire hazard due to the occasional use of fireworks. However, such activities are regulated by the Fire Department via a permitting process. Additionally, all nearby development (whether existing or proposed) within a Very High Fire Hazard Severity Zone would be expected to implement fuel modification activities, as required. As such, fire hazards would be minimized, and impacts would be less than significant.

(5) Conclusion

Based on the preceding analysis, the Project would not expose people or structures to a significant risk of loss, injury, or death involving fires due to: (1) the Project Site's location within a Very High Fire Hazard Severity Zone; (2) inadequate access within a high fire hazard area; (3) inadequate water and pressure to meet fire flow standards; or (4) proximity to land uses that have the potential for dangerous fire hazard. As such, impacts would be less than significant.

4. CUMULATIVE IMPACTS

The geographic context for the cumulative impact analysis of fire protection is the Fire Department service area. Cumulative growth through 2024 (i.e., the Project buildout year) within the Fire Department's service area has the potential to increase the demand for fire protection and emergency medical services. As previously discussed, the Fire Department employs a regional approach to providing fire protection and emergency medical services, wherein emergency response units are dispatched as needed to an incident anywhere in the Fire Department's service territory based on distance and availability, without regard to jurisdictional or municipal boundaries. As such, all of the forecasted growth and associated related projects were taken into account in this cumulative analysis, regardless of jurisdictional station, in order to present a more conservative analysis.

As with the Project, the related projects and all other future development projects in the service area would be subject to discretionary review by the Fire Department and would be required to comply with the County Fire Code and other relevant County Code requirements, or other applicable local code (e.g., City of Santa Clarita Fire Code) regulations, related to fire safety, building construction, access, fire flow, and fuel modification. Payment of the appropriate developers fee, which funds the purchase of station sites, the construction of new stations and facility improvements, and the funding of capital equipment, by the Project Applicant would mitigate the Project's contribution to

cumulative impacts. Like the Project Applicant, applicants for all future development projects in the area would be expected to pay the appropriate Fire Facilities Fees. With payment of such fees, cumulative impacts on fire protection would be less than significant.

a. County Development Monitoring System

The analysis above is consistent with DMS criteria related to fire hazards and protection. Specifically, based on compliance with Code requirements and other Fire Department standards, payment of appropriate developers fees, and the provision of new fire stations in the Project area, an adequate level of service would be provided to the Project in addition to future demands in the area. Accordingly, the Project would be consistent with DMS policies as they relate to fire hazards and protection.

5. MITIGATION MEASURES

a. Newhall Ranch RMDP/SCP Mitigation Measures

CDFW previously adopted mitigation measures to minimize impacts to fire protection services in connection with its adoption of the Newhall Ranch RMDP/SCP EIS/EIR. One of the RMDP/SCP mitigation measures also applies to the Project. If the status of the RMDP/SCP EIS/EIR is unresolved or set aside in the pending litigation at the time the County considers the Project EIR for certification, this EIR recommends that the County adopt the companion Entrada South (ES) mitigation measure set forth below, as applicable, to mitigate the Project's fire protection impacts. Those RMDP/SCP mitigation measures that are not applicable to the Project are listed in **Appendix 2B** with an explanation as to why they do not apply. Any italicized text provided in the parentheses below provides necessary updated information and/or clarifications, as needed.

MM ES 5.15-1/RMDP/SCP PH-7: All development of the Newhall Ranch Specific Plan site and the VCC and Entrada planning areas shall be in compliance the provisions of Los Angeles County Code, title 21, chapter 21.24, for secondary evacuation access. *(The Entrada planning area refers to the Entrada South Project Site. This measure would be achieved through regulatory compliance with County Code requirements.)*

b. Entrada South Project-Level Mitigation Measures

With implementation of the regulatory compliance measures and PDFs previously described, Project-level fire protection impacts would be less than significant. In addition, cumulative impacts would be less than significant. Therefore, no mitigation measures would be required beyond the applicable measure identified above.

In addition, refer to **Section 5.4**, Biological Resources, for mitigation measures regarding fire protection of biological resources, and the proposed Spineflower Preserve, in particular.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With compliance with all relevant regulatory requirements and implementation of the proposed PDFs, including payment of the applicable Fire Facility Fees, Project-level impacts with respect to fire protection would be less than significant. In addition, as the Project and all future residential development projects in the County would be required to pay the applicable Fire Facility Fees, cumulative fire protection impacts would be less than significant. Nonetheless, the Project also would be required to implement MM ES 5.15-1/ RMDP/SCP PH-7 to further reduce impacts related to fire protection.