Revised Draft SEIR Sections

5.14 Wildfire

5.0 ENVIRONMENTAL IMPACT ANALYSIS

14. WILDFIRE

1. INTRODUCTION

This section of the Supplemental Environmental Impact Report (SEIR) analyzes the Entrada South and Valencia Commerce Center (VCC) Project's (Modified Project) impacts with respect to wildfire, emergency response, and fire protection compared to the 2017 Project's impacts. Fire behavior modeling was conducted by Dudek for pre- and post-development conditions to document the type and intensity of fires that could be expected to occur adjacent to and within the Modified Project Site given characteristic features such as topography, vegetation, and weather. Dudek also prepared the *Fire Protection Plan* (FPP) dated March 2024, the *Wildfire Fire Evacuation Plan* (Evacuation Plan) dated October 2023, and the *Construction Fire Prevention Plan* (CFPP) dated July 2022 for the Modified Project to support this analysis, which are provided in **Appendices 5.14a, 5.14b, and 5.14c** to this SEIR, respectively. In addition, Stantec prepared a technical memorandum entitled *Entrada South and Valencia Commerce Center Modified Project's Consistency with the Santa Clarita Area Plan (One Valley One Vision) Circulation, Emergency Access, and Evacuation Framework* (Access and Evacuation Memo) in April 2022, which is provided in **Appendix 5.14d**. The following analysis of the Modified Project's impacts related to wildfire, emergency response, and fire protection is based, in part, on these technical reports.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

An overview of the regulatory setting is provided in **Table 5.14-1**, Wildfire Regulatory Overview, beginning on page 5.14-2, and a detailed discussion is provided below.

Table 5.14-1
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
Federal Regulations	
The Disaster Mitigation Act of 2000 The Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance. There are two different levels of State disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act has also established new requirements for local mitigation plans.	Cal OES
National Fire Plan The National Fire Plan was developed under Executive Order 11246 in August 2000, following a historic wildland fire season. Its intent is to establish plans for active response to severe wildland fires and their impacts to communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The program promotes close coordination among local, State, tribal, and Federal firefighting resources by conducting training, purchasing equipment, and providing prevention activities on a cost-shared basis. To help protect people and their property from potential catastrophic wildfire, the National Fire Plan directs funding to be provided for projects designed to reduce the fire risks to communities. High risk communities identified within the wildland-urban interface, the area where homes and wildlands intermix, were published in the Federal Register in 2001. At the request of Congress, the Federal Register notice only listed those communities neighboring Federal lands (CAL FIRE 2018b). As such, CAL FIRE incorporates concepts from this plan into local fire planning efforts.	CAL FIRE
State Regulations	
California Department of Forestry and Fire Protection CalFire is dedicated to the fire protection and stewardship of over 31,000,000 million acres of California's wildlands. The Office of the State Fire Marshal supports CalFire's mission to protect life and property through fire prevention engineering programs, law and code enforcement, and education. The State Fire Marshal provides for fire prevention by enforcing fire-related laws in state-owned or state-operated buildings, investigating arson fires in California, licensing those who inspect and service fire protection systems, approving fireworks as safe and sane for use in California, regulating the use of chemical flame retardants, evaluating building materials against fire safety standards, regulating hazardous liquid pipelines, and tracking incident statistics for local and state government emergency response agencies. Classification of a zone as moderate, high, or very high fire hazard is based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. Each area of the map gets a score for flame length, embers, and the likelihood of the area burning. Scores are then averaged over the zone areas. Final zone class (moderate, high, and very high) is based on the average scores for the zone.[a]	CAL FIRE
2018 Strategic Fire Plan for California The Strategic Fire Plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property	CAL FIRE

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
losses, increase firefighter safety, and contribute to ecosystem health. The Strategic Fire Plan is adopted to better respond to the changes of the environmental, social, and economic landscape of California's wildlands and to provide CalFire with appropriate guidance for adequate statewide fire protection of state responsibility areas. The Forestry Board has adopted Strategic Fire Plans for California since the 1930s and periodically updates them to reflect current and anticipated needs of California's wildland. The latest Strategic Fire Plan is dated August 22, 2018.	
Wildfire and Forest Resilience Action Plan In January 2021, a task force comprised of representatives from the Governor's office, the California Natural Resources Agency, California Environmental Protection Agency (CalEPA), and CalFire published California's Wildfire and Forest Resilience Action Plan. The plan is designed to accelerate efforts to restore the health and resilience of California forests, grasslands and natural places, improve the fire safety of our communities, and sustain the economic vitality of rural forested areas.	California Natural Resources Agency, CalEPA, CAL FIRE
Strategic Plan for Expanding the Use of Beneficial Fire In March 2022, the California Wildfire & Forest Resilience Task Force, which included representatives from CalEPA, CalFire, the California Natural Resources Agency, the U.S. Forest Service, and other agencies, published the Strategic Plan for Expanding the Use of Beneficial Fire to guide the expansion of beneficial fire across the state through 2025, as set forth in California's Wildfire and Forest Resilience Action Plan. The plan describes the historical use of beneficial fire in California, a term that collectively refers to prescribed fire, cultural burning, and fire managed for resource benefit. The goal of the plan is that by 2025, California will have the policies, programs, capacity, and knowledge to effectively deploy sufficient prescribed fire, cultural burning, and fire managed for resource benefit to meet the state's ecological, climate, public safety, public health, and cultural needs.	California Natural Resources Agency, CalEPA, CAL FIRE
California Office of Emergency Services The California Emergency Management Agency was incorporated into the Governor's Office on January 1, 2009, by Assembly Bill (AB) 38 (Nava), and merged the duties, powers, purposes, and responsibilities of the Governor's Office of Emergency Services (Cal OES) with those of the Governor's Office of Homeland Security. Cal OES is responsible for the coordination of overall state agency response to major disasters in support of local government. The agency is responsible for ensuring the state's readiness to respond to and recover from all hazards—natural, man-made, emergencies, and disasters—and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts. The Cal OES Fire and Rescue Division coordinates statewide response of fire and rescue mutual aid resources to all types of emergencies, including hazardous materials. The Operations Section under the Fire and Rescue Division coordinates the California Fire and Rescue Mutual Aid System, and coordinated response through the Mutual Aid System includes responses to major fires, earthquakes, tsunamis, hazardous materials, and other disasters.	Cal OES

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
California Building Code The CBC (CCR, Title 24, Part 2) identifies building design standards, including those for fire safety. The CBC is based on the International Building Code but has been amended for California conditions. The CBC includes several chapters relevant to fire safety and protection that address types of construction, fire and smoke protection features, construction materials and methods, and rooftop construction. Typical CFC 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.	County of Los Angeles
California Fire Code The CFC (CCR, Title 24, Part 9) incorporates by adoption the International Fire Code of the International Code Council, with California amendments. The purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, and dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas.	State Fire Marshal, County Fire
Fire Hazard Severity Zones CalFire is responsible for the fire protection and stewardship of more than 31 million acres of privately owned California wildlands. The CalFire Director's responsibilities include identifying FHSZs, transmitting that information to local agencies, and periodically reviewing the recommendations. CalFire is required by PRC Sections 4201–4204 and California Government Code Sections 51175–51189 to map these areas of significant fire hazards based on vegetative fuels, terrain, weather, and other relevant factors. 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. FHSZs reflect variations in fire behavior and exposure, and are used to develop permanent engineering mitigations associated with development in fire hazard areas.	CAL FIRE
California Public Resources Code Sections 4290 and 4291 California Public Resources Code (PRC) Section 4290 requires minimum fire safety standards related to defensible space that are applicable to residential, commercial, and industrial building construction in State Responsibility Area (SRA) lands and lands classified and designated as VHFHSZs. These regulations include road standards for fire apparatus access, standards for signs identifying roads and buildings, fuel breaks and green belts, and minimum water supply requirements. These regulations do not supersede local regulations that equal or exceed minimum regulations required by the state.	CAL FIRE, County of Los Angeles

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
California Building Standards Code The purpose of this code is to establish the minimum requirements to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, stability, access to persons with disabilities, sanitation, adequate lighting and ventilation, and energy conservation; safety to life and property from fire and other hazards attributed to the built environment; and to provide safety to fire fighters and emergency responders during emergency operations, The California Residential Code is Part 2.5 of thirteen parts of the official compilation and publication of the adoption, amendment and repeal of building regulations to the California Code of Regulations (CCR), Title 24, also referred to as the California Building Standards Code. This part incorporates by adoption the 2018 International Residential Code of the International Code Council with necessary California amendments.	County of Los Angeles
California Code of Regulations: Title 14, Natural Resources CCR Title 14, Division 1.5, Chapter 7, Subchapter 3, Fire Hazard, sets forth requirements for defensible space and provides alternate options if the required distances cannot be achieved. For example, options that have similar practical effects include noncombustible block walls or fences; 5 feet of noncombustible material horizontally around a structure; installing hardscape landscaping or reducing exposed windows on the side of structures with less than 30-foot setbacks; or additional structure hardening, such as those required in the California Building Code (CBC), CCR Title 24, Part 2, Chapter 7A.	County of Los Angeles
California Code of Regulations: Title 19, Public Safety 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.	County of Los Angeles
California Code of Regulations: Title 19, Division 2, Chapter 1, 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 multi-agency and multi-jurisdictional responses to emergencies in California, and coordinating among all levels of government and affected agencies. The Emergency System unifies all elements of California's emergency management community into a single, integrated system, and standardizes key elements. As required by state law, the County and the City of Santa Clarita (City) have adopted the Emergency System. 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.	County of Los Angeles, City of Santa Clarita

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
California Public Utilities Commission: General Order 95 California Public Utilities Commission (CPUC) General Order 95 applies to construction and reconstruction of overhead electric lines by a public utility in California. The replacement of poles, towers, or other structures is considered reconstruction and requires adherence to all strength and clearance requirements of this order. The CPUC has promulgated various Rules to implement the fire safety requirements of General Order 95 which are detailed below.	CPUC
California Public Utilities Commission: General Order 165 General Order 165 establishes requirements on a public utility for the inspection of electric distribution and transmission facilities that are not contained within a substation. Utilities must perform "Patrol" inspections, defined as a simple visual inspection of utility equipment and structures that is designed to identify obvious structural problems and hazards, at least once per year for each piece of equipment and structure. "Detailed" inspections, where individual pieces of equipment and structures are carefully examined, are required every five years for all overhead conductor and cables, transformers, switching/protective devices, and regulators/capacitors. By July 1st of each year, each utility subject to this General Order must submit an annual report of its inspections for the previous year under penalty of perjury.	CPUC
California Public Utilities Commission: General Order 166 General Order 166 Standard 1.E requires that investor-owned utilities develop a Fire Prevention Plan which describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that Investor Owned Utilities outline a plan to mitigate power line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire Prevention Plans created by Investor Owned Utilities are required to identify specific parts of the utility's service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to the CPUC regarding compliance with General Order 166.	CPUC
Assembly Bill 38 AB 38 (2019) established a comprehensive wildfire mitigation financial assistance program to, among other things, encourage cost-effective structure hardening and retrofitting to create fire-resistant homes, businesses, and public buildings. The bill requires the State Fire Marshal, in consultation with specified State officials, to identify building retrofits and structure hardening measures, and CAL FIRE to identify defensible space, vegetation management, and fuel modification activities, that are eligible for financial assistance under the program. The bill specifies the types of designated wildfire hazard areas eligible for funding under the program.	CAL FIRE
Assembly Bills 747 and 1409 AB 747 (2019) added, and AB 1409 (2020) amended Government Code Sections 65302.15 as follows: "(a) Upon the next revision of a local hazard mitigation plan, adopted in accordance with the federal Disaster Mitigation Act of 2000 (Public Law 106-390), on or after January 1, 2022, or, if a local	County of Los Angeles

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
jurisdiction has not adopted a local hazard mitigation plan, beginning on or before January 1, 2022, the safety element adopted pursuant to subdivision (g) of Section 65302 shall be reviewed and updated as necessary to identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios. A county or city that has adopted a local hazard mitigation plan, emergency operations plan, or other document that fulfills commensurate goals and objectives may use that information in the safety element to comply with this section and, in that event, shall summarize and incorporate into the safety element that other plan or document."	
Assembly Bill 1823 AB 1823 (2019) amended PRC Section 4290.1 to require that, on or before July 1, 2022, the State Board must develop criteria for and maintain a list of local agencies considered to be a "Fire Risk Reduction Community" located in the SRA or VHFHSZs, identified pursuant to Government Code 51178, that meet best practices for local fire planning. Criteria that must be used to develop the Fire Risk Reduction Community list include recently developed or updated CWPPs, adoption of the board's recommendations to improve the Safety Element, participation in Fire Adapted Communities and Firewise USA programs, and compliance with the Board's minimum fire safety standards.	County of Los Angeles
Senate Bill 99 Senate Bill (SB) 99 amended Government Code Section 65302(g)(5) and requires cities and counties to identify residential developments subject to any hazard described in a city's or county's safety element that have less than two evacuation routes. Meanwhile, Assembly Bill (AB) 747 (2020) and AB 1409 (2022), discussed above, require local agencies to Communities should take these planning requirements into consideration when addressing wildfire risks in the safety element.	County of Los Angeles
Senate Bill 1028 SB 1028 (2016) added Public Utilities Code section 8386 and requires each electrical corporation to construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment, and makes a violation of these provisions by an electrical corporation a crime under state law. The bill also requires each electrical corporation to annually prepare a wildfire mitigation plan and submit to CPUC for review. The plan must include a statement of objectives, a description of preventive strategies and programs that are focused on minimizing risk associated with electric facilities, and a description of the metrics that the electric corporation uses to evaluate the overall wildfire mitigation plan performance and assumptions that underlie the use of the metrics.	CPUC
Senate Bill 1241 SB 1241 (2012) revised the safety element provisions in State law to require all cities and counties whose planning area is within the SRA or VHFHSZs to address and incorporate specific information regarding wildfire hazards and risk, and policies and programs to address and reduce unreasonable risks associated with wildfire. These requirements are codified in Government	County of Los Angeles

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
Code Sections 65302(g)(3) and 65302.5(b).	
California Vegetation Treatment Program The California Vegetation Treatment Program (CalVTP), developed by the State Board, is a critical component of the state's multi-faceted strategy to address California's wildfire crisis. The CalVTP defines the vegetation treatment activities and associated environmental protections to reduce the risk of loss of lives and property, reduce fire suppression costs, restore ecosystems, and protect natural resources as well as other assets at risk from wildfire.	CAL FIRE
California Attorney General Guidance In October 2022, the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA. The guidance does not impose additional legal requirements on local governments. Instead, the Guidance is intended to provide guidance for evaluating potential wildfire and evacuation impacts associated with a proposed project under CEQA and to facilitate project design to reduce or mitigate wildfire, evacuation or emergency access impacts.	Office of the Attorney General
County Regulations	
County Code: Title 20, Utilities Division 1, Water, of Title 20 includes minimum requirements for water infrastructure, including minimum fire flow and fire hydrant requirements (Sections 20.16.060 and 20.16.140). 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 Modified Project would be required to meet the minimum requirements detailed in the County Fire Code, and any deviations from the County Fire Code would be reviewed and approved by the fire code official. Further, additional requirements for water availability in VHFHSZs would apply, such as the proximity of water storage.	County Fire
County Code: Title 21, Subdivisions Title 21 of the County Municipal Code is known as the "subdivision ordinance" and implements California's Subdivision Map Act. The subdivision ordinance applies to all subdivisions within the unincorporated territory of the county, and to the preparation of subdivision maps thereof, and to other maps provided for by the Subdivision Map Act. The subdivision ordinance includes design standards, including requirements for access, local streets and ways, and lot locations and orientations. The subdivision ordinance's design standards include particular requirements for development located in areas that are subject to hazard from brush or forest fire.	Department of Regional Planning
County Code: Title 26, Building Code Title 26 of the County Code contains the Building Code, which establishes minimum standards to preserve public health, safety, and general welfare by regulating the construction, design, installation, quality of materials, use, occupancy, location, and maintenance of development activities.	County of Los Angeles

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
County Code: Title 26, Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure Chapter 7A of Title 26 contains requirements for building materials, systems, and/or assemblies used in the exterior design and construction of new buildings (and additions, alterations, or repairs to existing buildings) within a wildland–urban interface fire area or FHSZ. Chapter 7A sets forth specific regulations, such as requirements for ignition-resistant construction, vents, and roofing materials.	County of Los Angeles
County Code: Title 32, Fire Code The Los Angeles County Fire Code (County Fire Code; Title 32) establishes standards for building construction and design, and distribution of fire prevention and suppression facilities. The requirements address a variety of issues related to fire protection and prevention, such as fire flow, public and private fire hydrants, the provision of roadway clearance (Title 32, Section 325.10), fire apparatus access roads (Title 32, Section 503.2), adequate road widths, and clearance of brush around structures located on or adjoining any mountainous or forest- or brush-covered land, or land covered with flammable growth (Title 32, Section 325.2.1). To comply with the County Code, new development within high fire hazard areas, as mapped by CalFire and the County, must also 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.	County Fire
Los Angeles County Fire Department 2022 Strategic Fire Plan The Los Angeles County Fire Department contracts with CAL FIRE to manage State Responsibility Areas within Los Angeles County. The Los Angeles County Fire Department's 2022 Strategic Fire Plan summarizes the Los Angeles County Unit, its Mission, Values, and Vision, and its role in reducing wildfires within Los Angeles County. The plan discusses the local fire environment, evaluations the Unit has conducted to prioritize hazards and its efforts to target highest priority areas for hazard reduction efforts, such as landscapes featuring, urban populations, water supplies, and threatened ecosystems. Specifically, the plan identifies structures, major roads, and transmission lines as the highest priority assets for County Fire, emphasizing the importance of fire access roads the fact that power delivery and communication sites susceptible to extended loss of service due to fire or interruption of these services is a public safety and welfare issue. With respect to water quality, the plan also notes that watersheds can burn in the dry season and then discharge torrents of debris into downstream-populated plains during subsequent severe, wet-season storms. The plan also outlines the Unit's efforts to prevent fires through passive protections, pre-fire planning, pre-fire engineering, community support, and structural fire hardening requirements. Examples include educating communities on benefits of proper safety practices and identifying and eliminating all types of hazardous conditions posing a threat to life, property, and the environment, safety inspections, and defensible space management, hazard fuel reduction, proper brush clearance, fire-resistive landscaping, fire-resistive construction, and good housekeeping around structures plays a critical role in increasing survivability in a wildfire. The plan further described its vegetation	County Fire

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
management efforts, the designated Fuel Modification Unit that reviews new development defensible space, and discusses its fire suppression philosophy. For example, the Forestry Division's Fuel Modification Unit's objective is to create defensible space necessary for effective fire protection in newly constructed and/or remodeled homes within the FHSZ. Once homes are constructed, an inspection is performed confirming implementation of the approved landscape plan and fuel modification parcels are subsequently moved into a "Brush Clearance Inspection Program."	
County of Los Angeles Developer Fee Program The County's Fire Facility Developer Fee Program (Fire Facility Fee) funds the purchase of station sites, construction of new stations and facility improvements, and funding of capital equipment. The Fire Facility Fee is based on the square footage of new construction (for all land uses) and payable at the time of building permit issuance. The Fire Department's share of local property taxes and a voter-approved Special Tax, not the Fire Facility Fee, fund staffing and operations. The Fire Facility Fee allows for funding and land dedication in lieu of fees, meaning the developer can choose to fund the construction of a new fire station instead of paying the fee. Also, credit can be applied toward unpaid Fire Facility Fee obligations for in-lieu or in-kind considerations. 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. The Five-Year Capital Plan aids the Fire Facility Fee Program by identifying sites where the fees can be directed. Payment of the Fire Facility Fee obligation typically constitutes full mitigation for development impacts.	County Fire
County of Los Angeles General Plan The County of Los Angeles General Plan provides the policy framework and guides development decisions in unincorporated Los Angeles County. The Land Use Element designates the proposed general distribution and general location and extent of uses while also providing the "blue print" for how land will be used to accommodate growth and change throughout the unincorporated areas of the County. The Safety Element of the General Plan provides an overview of fire hazards in the County, including wildland fires, flooding, and mud and debris flows. The General Plan includes numerous policies related to fire safety and development in fire hazard zones, a summary of which is provided below.	
Santa Clarita Valley Area Plan: One Valley One Vision 2012 The 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 Planning Area (Valley Planning Area) over a 20 year planning period. The Area Plan ensures consistency between the General Plans of the County and the City of Santa Clarita to achieve common goals. The Safety Element of the Area Plan addresses issues relating to fire hazards, including fire protection services and wildland fire protection. The Area Plan includes objectives and policies related to fire safety and development in fire hazard zones, a summary of which is provided below.	

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
Our County—Los Angeles Countywide Sustainability Plan Adopted by the Board of Supervisors in August 2019, the Los Angeles Countywide Sustainability Plan (County Sustainability Plan) is a regional sustainability plan that aims to enhance the well-being of every community in the County while reducing damage to the natural environment and adapting to the changing climate. The County Sustainability Plan outlines goals and strategies to create resilient and healthy communities, and develop community capacity to respond to emergencies. Such goals and strategies include limiting large-scale development in high climate-hazard areas, such as FHSZs, as mapped by CalFire (Strategy 3E). Implementing actions include evaluating options to limit new large-scale development in high climate-hazard areas (Action 56); evaluating the feasibility of programs to allow for the transfer of development rights in such areas (Action 57); and regularly updating the building code, fire code, and Hazard Mitigation Plan to reflect best practices in the wildland–urban interface (Action 58).	County of Los Angeles
Advisory Codes and Programs	
National Fire Protection Association Codes, Standards, Practices, and Goals National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. NFPA standards are recommended guidelines and nationally accepted good practices in fire protection but are not laws or codes unless adopted as such or referenced as such by the California Fire Code (CFC) or the local fire agency. The Firewise USA recognition program is administered by NFPA and provides a collaborative framework to help neighborhoods get organized, find direction, and take action to increase the ignition resistance of their homes and community and to reduce wildfire risks at the local level. The State Fire Marshal's new Community Wildfire Preparedness & Mitigation Division works to assist local communities in receiving the Firewise USA designation. County Fire evaluating opportunities for Firewise USA communities within the County.	NFPA
International Fire Code Created by the International Code Council, the International Fire Code (IFC) addresses a wide array of conditions hazardous to life and property, including fire, explosions, and hazardous materials handling or usage (although not a federal regulation, but rather the product of the International Code Council). The IFC places an emphasis on prescriptive and performance-based approaches to fire prevention and fire protection systems. Updated every 3 years, the IFC uses a hazards classification system to determine the appropriate measures to be incorporated to protect life and property (often times these measures include construction standards and specialized equipment). The IFC uses a permit system (based on hazard classification) to ensure that required measures are instituted (International Code Council 2018). The Modified Project must comply with the IFC as adopted by the	County of Los Angeles

Table 5.14-1 (Continued)
Wildfire Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
County.	
International Wildland-Urban Interface Code The International Wildland–Urban Interface Code is published by the International Code Council and addresses wildfire issues in the wildland–urban interface. It is a model code that is intended to be adopted and used supplemental to the adopted building and fire codes of a jurisdiction. The International Wildland–Urban Interface Code establishes minimum special regulations for development in the wildland-urban interface to safeguard life and property from wildfire hazards. The 2021 edition is fully compatible with all International Codes.	County of Los Angeles
Fire Adapted Communities The U.S. Forest Service, Department of the Interior and other agencies promote and support "fire adapted communities" through various programs, including the Fire Adapted Communities Learning Network. The purpose of these programs is for communities to take mitigation actions.	U.S. Forest Service

[a] *CalFire, Fact Sheet: Fire Hazard Severity Zone Model A Non-Technical Primer, May 2007.*

Source: Eyestone Environmental, 2024.

(1) Federal

(a) The Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance. There are two different levels of State disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act has also established new requirements for local mitigation plans.

(b) National Fire Plan

The National Fire Plan was developed under Executive Order 11246 in August 2000, following a historic wildland fire season. Its intent is to establish plans for active response to severe wildland fires and their impacts to communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The program promotes close coordination among local, State, tribal, and Federal firefighting resources by conducting training, purchasing equipment, and providing prevention activities on a cost-shared basis. To help protect people and their property from potential catastrophic wildfire, the National Fire Plan directs funding to be provided for projects designed to reduce the fire risks to

communities. High risk communities identified within the wildland-urban interface, the area where homes and wildlands intermix, were published in the Federal Register in 2001. At the request of Congress, the Federal Register notice only listed those communities neighboring Federal lands (CAL FIRE 2018b). As such, CAL FIRE incorporates concepts from this plan into local fire planning efforts.

(2) State

(a) California Department of Forestry and Fire Protection

CalFire is dedicated to the fire protection and stewardship of over 31,000,000 million acres of California's wildlands. The Office of the State Fire Marshal supports CalFire's mission to protect life and property through fire prevention engineering programs, law and code enforcement, and education. The State Fire Marshal provides for fire prevention by enforcing fire-related laws in state-owned or state-operated buildings, investigating arson fires in California, licensing those who inspect and service fire protection systems, approving fireworks as safe and sane for use in California, regulating the use of chemical flame retardants, evaluating building materials against fire safety standards, regulating hazardous liquid pipelines, and tracking incident statistics for local and state government emergency response agencies. Classification of a zone as moderate, high, or very high fire hazard is based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. Each area of the map gets a score for flame length, embers, and the likelihood of the area burning. Scores are then averaged over the zone areas. Final zone class (moderate, high, and very high) is based on the average scores for the zone.[1]

The Board of Forestry and Fire Protection (Forestry Board) is a government-appointed body within CalFire. It is responsible for developing the general forest policy of the state, determining the guidance policies of CalFire, and representing the state's interest in federal forestland in California. Together, the Forestry Board and CalFire work to carry out the California Legislature's mandate to protect and enhance the state's unique forest and wildland resources.

The Forestry Board is charged with protecting all wildland forest resources in California that are not under federal jurisdiction, with the Angeles National Forest greater than 5 miles north of the Project Site. These resources include major commercial and noncommercial stands of timber, areas reserved for parks and recreation, woodlands, brush-range watersheds, and all private and state lands that contribute to California's forest

[1] *CalFire, Fact Sheet: Fire Hazard Severity Zone Model A Non-Technical Primer, May 2007.*

resource wealth. However, CalFire has contracted with County Fire so that County Fire assumes the primary responsibility for fire suppression and prevention for State Responsibility Areas (SRAs) within Los Angeles County.

(b) 2018 Strategic Fire Plan for California

The Strategic Fire Plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The Strategic Fire Plan is adopted to better respond to the changes of the environmental, social, and economic landscape of California's wildlands and to provide CalFire with appropriate guidance for adequate statewide fire protection of state responsibility areas. The Forestry Board has adopted Strategic Fire Plans for California since the 1930s and periodically updates them to reflect current and anticipated needs of California's wildland. The latest Strategic Fire Plan is dated August 22, 2018.

The latest Strategic Fire Plan includes the following goals:

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

(c) Wildfire and Forest Resilience Action Plan

In January 2021, a task force comprised of representatives from the Governor's office, the California Natural Resources Agency, California Environmental Protection Agency (CalEPA), and CalFire published California's Wildfire and Forest Resilience Action Plan. The plan is designed to accelerate efforts to restore the health and resilience of California forests, grasslands and natural places, improve the fire safety of our communities, and sustain the economic vitality of rural forested areas. The plan includes four primary goals. First, the plan notes that the state must significantly increase the pace and scale of forest health projects to meet the goals of the state's 2018 Forest Carbon Plan and the Agreement for Shared Stewardship of California's Forest and Rangelands with the United States Forest Service, which call for federal and state agencies to each meet a goal of treating 500,000 acres annually by 2025. Second, the plan calls on the state to partner with federal and local agencies to significantly increase fire prevention, preparedness, and mitigation efforts, reduce community wildfire risk and create fire-adapted and resilient communities throughout the state. Third, the plan promotes forest management that helps achieve the state's economic and environmental goals, including integrating forest management into the state's biodiversity strategies, creating a sustainable wood products market in California, and expanding outdoor recreation on forestland. Fourth, the plan recommends the state utilize best available science and accelerate to understand the dynamics of forest management and forest health outcome and expand and improve monitoring, reporting, and support tools.

(d) Strategic Plan for Expanding the Use of Beneficial Fire

In March 2022, the California Wildfire & Forest Resilience Task Force, which included representatives from CalEPA, CalFire, the California Natural Resources Agency, the U.S. Forest Service, and other agencies, published the Strategic Plan for Expanding the Use of Beneficial Fire to guide the expansion of beneficial fire across the state through 2025, as set forth in California's Wildfire and Forest Resilience Action Plan. The plan describes the historical use of beneficial fire in California, a term that collectively refers to prescribed fire, cultural burning, and fire managed for resource benefit. The goal of the plan is that by 2025, California will have the policies, programs, capacity, and knowledge to effectively deploy sufficient prescribed fire, cultural burning, and fire managed for resource benefit to meet the state's ecological, climate, public safety, public health, and cultural needs. To implement this goal, the plan includes a detailed action plan, which includes measures to expand programs to increase the beneficial fire workforce, reduce liability for private landowners seeking to conduct prescribed fires, expand cultural burning and integrate tribal organizations and cultural fire practitioners into public agency prescribed fire projects and programs, and expand programs to better educate the public on the benefits of beneficial fire.

The plan does not establish specific geographic priorities for beneficial fire, but recognizes that land management activities must be tailored to ecosystems and natural resources, location of homes and other human infrastructure, time of year and climatic conditions, and goals and desired outcomes. As a result, the plan calls upon land managers to continue to seek input from their communities and other stakeholders in selecting appropriate areas for prescribed fire projects.

(e) California Office of Emergency Services

The California Emergency Management Agency was incorporated into the Governor's Office on January 1, 2009, by Assembly Bill (AB) 38 (Nava), and merged the duties, powers, purposes, and responsibilities of the Governor's Office of Emergency Services (Cal OES) with those of the Governor's Office of Homeland Security. Cal OES is responsible for the coordination of overall state agency response to major disasters in support of local government. The agency is responsible for ensuring the state's readiness to respond to and recover from all hazards—natural, man-made, emergencies, and disasters—and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

The Cal OES Fire and Rescue Division coordinates statewide response of fire and rescue mutual aid resources to all types of emergencies, including hazardous materials. The Operations Section under the Fire and Rescue Division coordinates the California Fire and Rescue Mutual Aid System, and coordinated response through the Mutual Aid System includes responses to major fires, earthquakes, tsunamis, hazardous materials, and other disasters.

(f) California Building Code

The CBC (CCR, Title 24, Part 2) identifies building design standards, including those for fire safety. The CBC is based on the International Building Code but has been amended for California conditions. The CBC is updated every three years, and the current 2022 CBC went into effect on January 1, 2023. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC.

The CBC includes several chapters relevant to fire safety and protection that address types of construction, fire and smoke protection features, construction materials and methods, and rooftop construction. Typical CFC 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.

Chapter 7A of the CBC regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a fire hazard area. Fire hazard areas as defined by the CBC include areas identified as an FHSZ within an SRA or a wildland–urban interface fire area. The purpose of Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of structures located in a fire hazard area to resist the intrusion of flames or burning embers projected by a wildfire, and to contribute to a systematic reduction in structural losses from a wildfire. New buildings located in such areas must comply with the ignition-resistant construction standards outlined in Chapter 7A.

(g) California Fire Code

The CFC (CCR, Title 24, Part 9) incorporates by adoption the International Fire Code of the International Code Council, with California amendments. The purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, and dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas.

The CFC and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC is updated and published every 3 years by the California Building Standards Commission. The current 2022 CFC went into effect on January 1, 2023. It is effective statewide but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission.

(h) Fire Hazard Severity Zones

CalFire is responsible for the fire protection and stewardship of more than 31 million acres of privately owned California wildlands. The CalFire Director's responsibilities include identifying FHSZs, transmitting that information to local agencies, and periodically reviewing the fire hazard severity zones. CalFire is required by Public Resources Code (PRC) Sections 4201–4204 and California Government Code Sections 51175–51189 to map these areas of significant fire hazards based on vegetative fuels, terrain, weather, and other relevant factors. 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. FHSZs

reflect variations in fire behavior and exposure, and are used to develop permanent engineering mitigations associated with development in fire hazard areas.

Heightened fire code requirements apply to development within certain VHFHSZs. The State Fire Marshal developed minimum statewide building construction regulations (contained in CCR Title 24, Part 2, Chapter 7A, as discussed above) 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 FHSZs.

The County contains areas mapped as FHSZs within SRA lands and separate VHFHSZs within Local Responsibility Area lands. SRA and Local Responsibility Area designations delineate where the state and local agencies are financially responsible for fire prevention and protection. CalFire provides recommended VHFHSZ maps within the Local Responsibility Area to the local agencies. CalFire staff assists local agencies in the review of these recommendations, and local agencies either adopt or modify and adopt these recommendations, along with development requirements designed to reduce the risk and intensity of uncontrolled fires that threaten to destroy resources, life, or property.

Government Code Section 66474.02 requires that a legislative body of a county make specific findings before approving a tentative map, or a parcel map for which a tentative map was not required, for an area located in the SRA or VHFHSZ. The findings must show that that the subdivision is consistent with regulations adopted by the State Board pursuant to Sections 4290 and 4291 of the PRC or consistent with local ordinances certified by the State Board as meeting or exceeding the State regulations.

As disclosed in the State-certified EIR for the 2017 Project and as discussed further below, the Entrada South and VCC Planning Areas are located in VHFHSZs.

(i) California Public Resources Code Sections 4290 and 4291

PRC Section 4290 requires minimum fire safety standards related to defensible space that are applicable to residential, commercial, and industrial building construction in State Responsibility Area (SRA) lands and lands classified and designated as VHFHSZs. These regulations include road standards for fire apparatus access, standards for signs identifying roads and buildings, fuel breaks and green belts, and minimum water supply requirements. These regulations do not supersede local regulations that equal or exceed minimum regulations required by the state.

PRC Section 4290.5 requires the State Board to identify existing subdivisions in the SRA or VHFHSZ without secondary egress routes, that are at significant fire risk. The Board must then provide recommendations to local governments to improve safety in the identified subdivisions. This process must begin on or before July 1, 2021, and repeat every five years thereafter.

PRC Section 4291 requires a reduction of fire hazards around buildings located adjacent to a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered in flammable material. As designated by PRC 4291, a fuel modification typically consists of at least 100 feet, measured in a horizontal plane, from the exterior façade of all structures towards the undeveloped areas. It is required to maintain 100 feet of defensible space around all sides of a structure, but not beyond the property line unless required by state law, local ordinance, rule, or regulations. Further, PRC Section 4291 requires the removal of dead or dying vegetative materials from the roof of a structure, and trees and shrubs must be trimmed from within 10 feet of the outlet of a chimney or stovepipe. Exemptions may apply for buildings with an exterior constructed entirely of nonflammable materials.

In January 2023, the California Office of Administrative Law approved amendments to the Board of Forestry and Fire Protection's State Minimum Fire Safe Regulations, which implement the provisions the Public Resources Code sections 4102, 4126, 4127, and 4290. The State Minimum Fire Safe Regulations set standards and requirements for new development regarding ingress and egress, signing and building numbering, access to emergency water, building siting, setbacks, and fuel modification areas. Under AB 3074 (2020), the Board of Forestry and Fire Protection develop guidance on new ember-resistant zones (ERZs) within 0 to 5 feet of a structure.[2]

(j) California Building Standards Code

The purpose of this code is to establish the minimum requirements to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, stability, access to persons with disabilities, sanitation, adequate lighting and

[2] *Assembly Bill 3074, passed into law in 2020, amends PRC 4291 and requires the Board of Forestry and Fire Protection, by January 1, 2023, in consultation with the Office of the State Fire Marshal, shall update guidance to include suggestions for creating an ember-resistant zone within 5 feet of a structure based on regulations promulgated by the State Board of Forestry and Fire Protection, in consultation with the Office of the State Fire Marshal, to consider the elimination of materials in the ember-resistant zone that would likely be ignited by embers. This new zone is referred to as "Zone 0." As of publication, the Board of Forestry has not promulgated Zone 0 regulations. However, in anticipation of these requirements potentially becoming mandatory, the Modified Project includes an ember-resistant zone within 0 to 5 feet of a structure in the defensible space requirements.*

ventilation, and energy conservation; safety to life and property from fire and other hazards attributed to the built environment; and to provide safety to fire fighters and emergency responders during emergency operations, The California Residential Code is Part 2.5 of thirteen parts of the official compilation and publication of the adoption, amendment and repeal of building regulations to the California Code of Regulations (CCR), Title 24, also referred to as the California Building Standards Code. This part incorporates by adoption the 2018 International Residential Code of the International Code Council with necessary California amendments.

(k) California Code of Regulations

The relevant provisions of the CCR contain regulatory requirements that relate to fire safety, accessibility, water supply, and development in fire hazard areas.

(i) Title 14, Natural Resources

CCR Title 14, Division 1.5, Chapter 7, Subchapter 3, Fire Hazard, sets forth requirements for defensible space and provides alternate options if the required distances cannot be achieved. For example, options that have similar practical effects include noncombustible block walls or fences; 5 feet of noncombustible material horizontally around a structure; installing hardscape landscaping or reducing exposed windows on the side of structures with less than 30-foot setbacks; or additional structure hardening, such as those required in the California Building Code (CBC), CCR Title 24, Part 2, Chapter 7A.

(ii) Title 19, Public Safety

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.

(iii) Title 19, Division 2, Chapter 1, 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 multi-agency and multi-jurisdictional responses to emergencies in California, and coordinating among all levels of government and affected agencies. The Emergency System unifies all elements of California's emergency management community into a single, integrated system, and standardizes key elements.

As required by state law, the County and the City of Santa Clarita (City) have adopted the Emergency System. 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.

(l) California Public Utilities Commission

(i) General Order 95

California Public Utilities Commission (CPUC) General Order 95 applies to construction and reconstruction of overhead electric lines by a public utility in California. The replacement of poles, towers, or other structures is considered reconstruction and requires adherence to all strength and clearance requirements of this order. The CPUC has promulgated various Rules to implement the fire safety requirements of General Order 95, including:

- Rule 18A requires utility companies take appropriate corrective action to remedy Safety Hazards.
- General Order 95 nonconformances requires that each utility company establish an auditable maintenance program.
- Rules 31.2 requires that lines be inspected frequently and thoroughly.
- Rule 35 requires that vegetation management activities be performed in order to establish necessary and reasonable clearances. These requirements apply to all overhead electrical supply and communication facilities that are covered by General Order 95, including facilities on lands owned and maintained by California State and local agencies.
- Rule 38 establishes minimum vertical, horizontal, and radial clearances of wires from other wires.
- Rule 43.2.A.2 requires that for lines located within Tier 2 or Tier 3 zones, the wind loads required in Rule 43.2.A.1 be multiplied by a wind load factor of 1.1.

(ii) General Order 165

General Order 165 establishes requirements on a public utility for the inspection of electric distribution and transmission facilities that are not contained within a substation. Utilities must perform “Patrol” inspections, defined as a simple visual inspection of utility equipment and structures that is designed to identify obvious structural problems and

hazards, at least once per year for each piece of equipment and structure. “Detailed” inspections, where individual pieces of equipment and structures are carefully examined, are required every five years for all overhead conductor and cables, transformers, switching/protective devices, and regulators/capacitors. By July 1st of each year, each utility subject to this General Order must submit an annual report of its inspections for the previous year under penalty of perjury.

(iii) General Order 166

General Order 166 Standard 1.E requires that investor-owned utilities develop a Fire Prevention Plan which describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that Investor Owned Utilities outline a plan to mitigate power line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire Prevention Plans created by Investor Owned Utilities are required to identify specific parts of the utility’s service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to the CPUC regarding compliance with General Order 166.

(m) Assembly Bill 38

AB 38 (2019) established a comprehensive wildfire mitigation financial assistance program to, among other things, encourage cost-effective structure hardening and retrofitting to create fire-resistant homes, businesses, and public buildings. The bill requires the State Fire Marshal, in consultation with specified State officials, to identify building retrofits and structure hardening measures, and CAL FIRE to identify defensible space, vegetation management, and fuel modification activities, that are eligible for financial assistance under the program. The bill specifies the types of designated wildfire hazard areas eligible for funding under the program.

(n) Assembly Bills 747 and 1409

AB 747 (2019) added, and AB 1409 (2020) amended Government Code Sections 65302.15 as follows: “(a) Upon the next revision of a local hazard mitigation plan, adopted in accordance with the federal Disaster Mitigation Act of 2000 (Public Law 106-390), on or after January 1, 2022, or, if a local jurisdiction has not adopted a local hazard mitigation plan, beginning on or before January 1, 2022, the safety element adopted pursuant to subdivision (g) of Section 65302 shall be reviewed and updated as necessary to identify evacuation routes and their capacity, safety, and viability and evacuation locations under a range of emergency scenarios. A county or city that has adopted a local hazard mitigation plan, emergency operations plan, or other document that fulfills commensurate goals and objectives may use that information in the safety element to comply with this section and, in

that event, shall summarize and incorporate into the safety element that other plan or document."

(o) Assembly Bill 1823

AB 1823 (2019) amended PRC Section 4290.1 to require that, on or before July 1, 2022, the State Board must develop criteria for and maintain a list of local agencies considered to be a "Fire Risk Reduction Community" located in the SRA or VHFHSZs, identified pursuant to Government Code 51178, that meet best practices for local fire planning. Criteria that must be used to develop the Fire Risk Reduction Community list include recently developed or updated CWPPs, adoption of the board's recommendations to improve the Safety Element, participation in Fire Adapted Communities and Firewise USA programs, and compliance with the Board's minimum fire safety standards.

(p) Senate Bill 99

Senate Bill (SB) 99 amended Government Code Section 65302(g)(5) and requires cities and counties to identify residential developments subject to any hazard described in a city's or county's safety element that have less than two evacuation routes. Meanwhile, Assembly Bill (AB) 747 (2020) and AB 1409 (2022), discussed above, require local agencies to Communities should take these planning requirements into consideration when addressing wildfire risks in the safety element.

(q) Senate Bill 1028

SB 1028 (2016) added Public Utilities Code section 8386 and requires each electrical corporation to construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment, and makes a violation of these provisions by an electrical corporation a crime under state law. The bill also requires each electrical corporation to annually prepare a wildfire mitigation plan and submit to CPUC for review. The plan must include a statement of objectives, a description of preventive strategies and programs that are focused on minimizing risk associated with electric facilities, and a description of the metrics that the electric corporation uses to evaluate the overall wildfire mitigation plan performance and assumptions that underlie the use of the metrics.

(r) Senate Bill 1241

SB 1241 (2012) revised the safety element provisions in State law to require all cities and counties whose planning area is within the SRA or VHFHSZs to address and incorporate specific information regarding wildfire hazards and risk, and policies and

programs to address and reduce unreasonable risks associated with wildfire. These requirements are codified in Government Code Sections 65302(g)(3) and 65302.5(b).

(s) California Vegetation Treatment Program

The California Vegetation Treatment Program (CalVTP), developed by the State Board, is a critical component of the state's multi-faceted strategy to address California's wildfire crisis. The CalVTP defines the vegetation treatment activities and associated environmental protections to reduce the risk of loss of lives and property, reduce fire suppression costs, restore ecosystems, and protect natural resources as well as other assets at risk from wildfire.

(t) California Attorney General Guidance

In October 2022, the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA. The guidance does not impose additional legal requirements on local governments. Instead, the Guidance is intended to provide guidance for evaluating potential wildfire and evacuation impacts associated with a proposed project under CEQA and to facilitate project design to reduce or mitigate wildfire, evacuation, or emergency access impacts. Additional discussion of the Attorney General guidance regarding evacuations measures, wildfire modeling, qualitative assessments, and potential mitigation measures is provided in the FPP and Evacuation Plan, provided in **Appendices 5.14a** and **5.14b**, respectively.

(3) County

(a) County Code

The Modified Project would be subject to the provisions of the Los Angeles County Code. Provisions related to wildfire and fire safety are described below.

(i) Title 20, Utilities

Division 1, Water, of Title 20 includes minimum requirements for water infrastructure, including minimum fire flow and fire hydrant requirements (Sections 20.16.060 and 20.16.140). 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 Modified Project would be required to meet the minimum requirements detailed in the County Fire Code, and any deviations from the County Fire Code would be reviewed and approved by the fire code official. Further, additional requirements for water availability in VHFHSZs would apply, such as the proximity of water storage.

(ii) Title 21, Subdivisions

Title 21 of the County Municipal Code is known as the "subdivision ordinance" and implements California's Subdivision Map Act. The subdivision ordinance applies to all subdivisions within the unincorporated territory of the county, and to the preparation of subdivision maps thereof, and to other maps provided for by the Subdivision Map Act. The subdivision ordinance includes design standards, including requirements for access, local streets and ways, and lot locations and orientations. The subdivision ordinance's design standards include particular requirements for development located in areas that are subject to hazard from brush or forest fire.

The Department of Regional Planning is in the process of developing the Community Wildfire Protection (CWP) Ordinance. The CWP Ordinance was formerly named, and referenced in the General Plan, as the Reduce Damage From Wildfire Ordinance. The CWP Ordinance is being drafted in response to the February 11, 2020 motion by the Los Angeles County Board of Supervisors. The CWP Ordinance will amend the Title 21 and Title 22 (Planning and Zoning Code) to address adequate evacuation egress during wildfire events, to improve public safety, and to reduce risks to development located within VHFSHSZ.

(iii) Title 26, Building Code

Title 26 of the County Code contains the Building Code, which establishes minimum standards to preserve public health, safety, and general welfare by regulating the construction, design, installation, quality of materials, use, occupancy, location, and maintenance of development activities.

(iv) Title 26, Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure

Chapter 7A of Title 26 contains requirements for building materials, systems, and/or assemblies used in the exterior design and construction of new buildings (and additions, alterations, or repairs to existing buildings) within a wildland–urban interface fire area or FHSZ. Chapter 7A sets forth specific regulations, such as requirements for ignition-resistant construction, vents, and roofing materials.

(v) Title 32, Fire Code

The Los Angeles County Fire Code (County Fire Code; Title 32) establishes standards for building construction and design, and distribution of fire prevention and suppression facilities. The requirements address a variety of issues related to fire protection and prevention, such as fire flow, public and private fire hydrants, the provision of roadway clearance (Title 32, Section 325.10), fire apparatus access roads (Title 32,

Section 503.2), adequate road widths, and clearance of brush around structures located on or adjoining any mountainous or forest- or brush-covered land, or land covered with flammable growth (Title 32, Section 325.2.1).

To comply with the County Code, new development within high fire hazard areas, as mapped by CalFire and the County, must also 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.

The Modified Project Site is located within a VHFHSZ, which renders it subject to additional County Fire Code regulations for fuel modification in fire hazard areas. Specifically, Title 32, Section 4906.3 requires preparation of a Fuel Modification Plan. The Fuel Modification Plan must include a set of scaled plans, including a plot plan that shows fuel modification zones, 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.

(b) Los Angeles County Fire Department 2022 Strategic Fire Plan

The Los Angeles County Fire Department contracts with CAL FIRE to manage State Responsibility Areas within Los Angeles County. The Los Angeles County Fire Department's 2022 Strategic Fire Plan summarizes the Los Angeles County Unit, its Mission, Values, and Vision, and its role in reducing wildfires within Los Angeles County. The plan discusses the local fire environment, evaluations the Unit has conducted to prioritize hazards and its efforts to target highest priority areas for hazard reduction efforts, such as landscapes featuring, urban populations, water supplies, and threatened ecosystems. Specifically, the plan identifies structures, major roads, and transmission lines as the highest priority assets for County Fire, emphasizing the importance of fire access roads the fact that power delivery and communication sites susceptible to extended loss of service due to fire or interruption of these services is a public safety and welfare issue. With respect to water quality, the plan also notes that watersheds can burn in the dry season and then discharge torrents of debris into downstream-populated plains during subsequent severe, wet-season storms. The plan also outlines the Unit's efforts to prevent fires through passive protections, pre-fire planning, pre-fire engineering, community support, and structural fire hardening requirements. Examples include educating communities on benefits of proper safety practices and identifying and eliminating all types of hazardous conditions posing a threat to life, property, and the environment, safety inspections, and defensible space management, hazard fuel reduction, proper brush clearance, fire-resistive landscaping, fire-resistive construction, and good housekeeping around structures plays a critical role in increasing survivability in a wildfire. The plan

further described its vegetation management efforts, the designated Fuel Modification Unit that reviews new development defensible space, and discusses its fire suppression philosophy. For example, the Forestry Division's Fuel Modification Unit's objective is to create defensible space necessary for effective fire protection in newly constructed and/or remodeled homes within the FHSZ. Once homes are constructed, an inspection is performed confirming implementation of the approved landscape plan and fuel modification parcels are subsequently moved into a "Brush Clearance Inspection Program".

(c) County of Los Angeles Developer Fee Program

The County's Fire Facility Developer Fee Program (Fire Facility Fee) funds the purchase of station sites, construction of new stations and facility improvements, and funding of capital equipment. The Fire Facility Fee is based on the square footage of new construction (for all land uses) and payable at the time of building permit issuance. The Fire Department's share of local property taxes and a voter-approved Special Tax, not the Fire Facility Fee, fund staffing and operations. The Fire Facility Fee allows for funding and land dedication in lieu of fees, meaning the developer can choose to fund the construction of a new fire station instead of paying the fee. Also, credit can be applied toward unpaid Fire Facility Fee obligations for in-lieu or in-kind considerations. 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. The Five-Year Capital Plan aids the Fire Facility Fee Program by identifying sites where the fees can be directed. Payment of the Fire Facility Fee obligation typically constitutes full mitigation for development impacts.

(d) County of Los Angeles General Plan

The County of Los Angeles General Plan provides the policy framework and guides development decisions in unincorporated Los Angeles County. The Land Use Element designates the proposed general distribution and general location and extent of uses while also providing the "blue print" for how land will be used to accommodate growth and change throughout the unincorporated areas of the County. The Safety Element of the General Plan provides an overview of fire hazards in the County, including wildland fires, flooding, and mud and debris flows.

The following policies related to fire safety and development in fire hazard zones are applicable to the Modified Project:

- **Policy LU 11.6:** Ensure that subdivisions in VHFHSZs site open space to minimize fire risks, as feasible.

- **Policy S 1.3:** Require developments to mitigate geotechnical hazards, such as soil instability and landsliding, in Hillside Management Areas through siting and development standards.

- **Policy S 4.1: 1:** Prohibit new subdivisions in VHFHSZs unless: (1) the new subdivision is generally surrounded by existing or entitled development or is located in an existing approved specific plan or is within the boundaries of a communities facility district adopted by the County prior to January 1, 2022, including any improvement areas and future annexation areas identified in the County resolution approving such district; (2) the County determines there is sufficient secondary egress; and (3) the County determines the adjoining major highways and street networks are sufficient for evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new subdivisions in all other FHSZs.

- **Policy S 4.2:** New subdivisions shall provide adequate evacuation and emergency vehicle access to and from the subdivision on streets or street systems that are evaluated for their traffic access or flow limitations, including but not limited to weight or vertical clearance limitations, dead-end, one-way, or single lane conditions.

- **Policy S 4.3:** Ensure that biological and natural resources are protected during rebuilding after a wildfire event.

- **Policy S 4.4:** Reduce the risk of wildland fire hazards through meeting minimum State and local for fire-resistant building materials, vegetation management, fuel modification, and other fire hazard reduction programs.

- **Policy S 4.5** Encourage the use of climate-adapted plants that are compatible with the area's natural vegetative habitats.

- **Policy S 4.6:** Ensure that infrastructure requirements for new development meet minimum State and local regulations for, ingress, egress, peak load water supply availability, anticipated water supply, and other standards within FHSZs.

- **Policy S 4.7:** Discourage building mid-slope, on ridgelines and on hilltops, and employ adequate setbacks on and below slopes to reduce risk from wildfires and post-fire, rainfall-induced landslides and debris flows.

- **Policy S 4.8:** Support the retrofitting of existing structures in FHSZs to meet current safety regulations, such as the building and fire code, to help reduce the risk of structural and human loss due to wildfire.

- **Policy S 4.9:** Adopt by reference the County of Los Angeles Fire Department Strategic Fire Plan, as amended.

- **Policy S 4.10:** Encourage the planting of native oaks in strategic locations and near existing oak woodlands, including those to be mapped in the Oak Woodlands Conservation Management Plan, to protect developments from wildfires, as well as to lessen fire risk associated with developments.

- **Policy S 4.11:** Support efforts to address unique pest, disease, exotic species and other forest health issues in open space areas to reduce fire hazards and support ecological integrity.

- **Policy S 4.12:** Support efforts to incorporate systematic fire protection improvements for open space, including facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with landowners and other stakeholders, and water sources for fire suppression.

- **Policy S 4.14:** Encourage the strategic placement of structures in FHSZs that conserves fire suppression resources, increases safety for emergency fire access and evacuation, and provides a point of attack or defense from a wildfire.

- **Policy S 4.15:** Encourage rebuilds and additions to comply with fire mitigation guidelines.

- **Policy S 4.16:** Require local development standards to meet or exceed SRA Fire Safe Regulations, which include visible home and street addressing and signage and vegetation clearance maintenance on public and private roads; all requirements in the California Building Code and Fire Code; and Board of Forestry Fire Safe Regulations.

- **Policy S 4.17:** Coordinate with agencies, including the Fire Department and ACWM, to ensure that effective fire buffers are maintained through brush clearance and fuel modification around developments.

- **Policy S 4.18:** Require Fire Protection Plans for new residential subdivisions in FHSZs that minimize and mitigate potential loss from wildfire exposure, and reduce impact on the community's fire protection delivery system.

- **Policy S 4.19:** Ensure all water distributors providing water in unincorporated Los Angeles County identify, maintain, and ensure the long-term integrity of future water supply for fire suppression needs, and ensure that water supply infrastructure adequately supports existing and future development and redevelopment, and provides adequate water flow to combat structural and wildland fires, including during peak domestic demand periods.

- **Policy S 4.20:** Prohibit new and intensification of existing general assembly uses in VHFHSZs unless the use is located in an existing approved specific plan or meets secondary egress route requirements and the level of service capacity of adjoining major highways and street networks can accommodate evacuation. Discourage new general assembly uses in all other FHSZs.

- **Policy S 7.1:** Ensure that residents are protected from the public health consequences of natural or human-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.

- **Policy S 7.2:** Support County emergency providers in reaching their response time goals.

- **Policy S 7.3:** Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.

- **Policy S 7.5:** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

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

The 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 Planning Area (Valley Planning Area) over a 20 year planning period. The Area Plan ensures consistency between the General Plans of the County and the City of Santa Clarita to achieve common goals. The Safety Element of the Area Plan addresses issues relating to fire hazards, including fire protection services and wildland fire protection.

The following policies related to fire safety and development in fire hazard zones are applicable to the Modified Project:

- **Objective C-2.5:** Consider the needs for emergency access in transportation planning.

- **Policy C-2.5.1:** Maintain a current evacuation plan as part of emergency response planning.

- **Policy C-2.5.2:** Ensure that new development is provided with adequate emergency and/or secondary access for purposes of evacuation and emergency response; require two points of ingress and egress for every subdivision or phase thereof, except as otherwise approved for small subdivisions where physical constraints preclude a second access point.

- **Objective LU-3.3:** Ensure that the design of residential neighborhoods considers and includes measures to reduce impacts from natural or man-made hazards.

- **Policy LU-3.3.2:** In areas subject to wildland fire danger, ensure that land uses have adequate setbacks, fuel modify cation areas, and emergency access routes.

- **Policy LU-3.3.5:** Through the development review process, ensure that all new residential development is provided with adequate emergency access and that subdivision and site designs permit ready access by public safety personnel.

- **Policy LU-3.3.7:** Ensure adequate addressing in all residential neighborhoods for emergency response.

- **Policy LU-7.1.1:** Require shade trees within parking lots and adjacent to buildings to reduce the heat island effect, in consideration of Fire Department fuel modification restrictions.

(f) Our County—Los Angeles Countywide Sustainability Plan

Adopted by the Board of Supervisors in August 2019, the Los Angeles Countywide Sustainability Plan (County Sustainability Plan) is a regional sustainability plan that aims to enhance the well-being of every community in the County while reducing damage to the natural environment and adapting to the changing climate. The County Sustainability Plan outlines goals and strategies to create resilient and healthy communities, and develop community capacity to respond to emergencies. Such goals and strategies include limiting large-scale development in high climate-hazard areas, such as FHSZs, as mapped by CalFire (Strategy 3E). Implementing actions include evaluating options to limit new large-scale development in high climate-hazard areas (Action 56); evaluating the feasibility of programs to allow for the transfer of development rights in such areas (Action 57); and regularly updating the building code, fire code, and Hazard Mitigation Plan to reflect best practices in the wildland–urban interface (Action 58).

(4) Advisory Codes and Programs

(a) National Fire Protection Association Codes, Standards, Practices, and Goals

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. NFPA standards are recommended guidelines and nationally accepted good practices in fire protection but are not laws or codes unless adopted as such or referenced as such by the California Fire Code (CFC) or the local fire agency.

The Firewise USA recognition program is administered by NFPA and provides a collaborative framework to help neighborhoods get organized, find direction, and take action to increase the ignition resistance of their homes and community and to reduce wildfire risks at the local level. The State Fire Marshal's new Community Wildfire Preparedness & Mitigation Division works to assist local communities in receiving the Firewise USA designation. County Fire evaluating opportunities for Firewise USA communities within the County.

(b) International Fire Code

Created by the International Code Council, the International Fire Code (IFC) addresses a wide array of conditions hazardous to life and property, including fire, explosions, and hazardous materials handling or usage (although not a federal regulation, but rather the product of the International Code Council). The IFC places an emphasis on prescriptive and performance-based approaches to fire prevention and fire protection systems. Updated every 3 years, the IFC uses a hazards classification system to determine the appropriate measures to be incorporated to protect life and property (often times these measures include construction standards and specialized equipment). The IFC uses a permit system (based on hazard classification) to ensure that required measures are instituted (International Code Council 2018). The Modified Project must comply with the IFC as adopted by the County.

(c) International Wildland-Urban Interface Code

The International Wildland–Urban Interface Code is published by the International Code Council and addresses wildfire issues in the wildland–urban interface. It is a model code that is intended to be adopted and used supplemental to the adopted building and fire codes of a jurisdiction. The International Wildland–Urban Interface Code establishes minimum special regulations for development in the wildland-urban interface to safeguard life and property from wildfire hazards. The 2021 edition is fully compatible with all International Codes.

(d) Fire Adapted Communities

The U.S. Forest Service, Department of the Interior and other agencies promote and support "fire adapted communities" through various programs, including the Fire Adapted Communities Learning Network. The purpose of these programs is for communities to take mitigation actions.

b. Existing Conditions

A wildfire is an uncontrolled fire in an area of combustible vegetation that is generally extensive in size. Wildfires differ from other fires in that they take place outdoors in areas of grassland, woodlands, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel, or combustible material. Buildings may become involved if a wildfire spreads to adjacent communities. The Governor's Office of Planning and Research (OPR) has recognized that although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate- housing density were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. The primary factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions.

As with the 2017 Project, the Modified Project Site is surrounded by existing and planned development. There is substantial development near the Entrada South Planning Area, including I-5 to the east, Six Flags Magic Mountain theme park and SR-126 to the north, the approved Mission Village community (under construction) to the west, and the existing Westridge community to the south, along with secondary road infrastructure to the south, east, and north. Land uses surrounding the VCC Planning Area include commercial, light industrial, and residential development as well as vacant land with limited vegetative cover. Existing mixed use development is located immediately north of the VCC Planning Area and commercial development is north, northwest, and west of the VCC Planning Area, along with SR-126 to the south. The surrounding development reduces the risk of both encroaching fires and off-site fire spread during construction.

(1) Entrada South Planning Area

As presented in **Figure 5.14-1**, Fire Hazard Severity Zones, on page 5.14-42, the Entrada South Planning Area is located in an area designated by County Fire and CalFire as a VHFHSZ, which remains unchanged from the 2017 Project.

Most of the Entrada South Planning Area is undeveloped and contains rugged terrain, but there is direct disturbance from past oil and natural gas operations on about 26 percent (approximately 130 acres) of the site, including associated dirt roads and oil pad ground clearance zones. The southeastern corner of the Entrada South Planning Area is dedicated to a 29.17-acre spineflower preserve.

There is significant development influence near the Entrada South Planning Area, including Interstate 5 (I-5) to the east, State Route 126 (SR-126) to the north, and secondary road infrastructure to the south, east, and north. The Westridge development, medium-density residential housing, and an integrated golf course are adjacent to the site on the south and southeast, and major commercial land use adjacent to the north and east

includes the Six Flags Magic Mountain theme park. Planned development, including Mission Village and other communities within and adjacent to the Newhall Ranch Specific Plan area, are located to the west and southwest, respectively. The approved Mission Village community, which will include a new fire station, is currently under construction. Southern California Edison (SCE) and Southern California Gas Company (SoCalGas) have transmission corridors within easements along the southern boundary of the site. SCE actively maintains the easements/transmission lines and access roads. The Westridge golf course is south of the SCE transmission line easement.

(2) VCC Planning Area

As presented in **Figure 5.14-1**, Fire Hazard Severity Zones, on page 5.14-42, the VCC Planning Area is located in an area designated by County Fire and CalFire as a VHFHSZ, which remains unchanged from the 2017 Project.

Most of the VCC Planning Area is undeveloped, but there is direct disturbance from sand and gravel production, cattle grazing, and agricultural operations on about 27 percent (approximately 169 acres) of the site, including associated dirt roads and graded areas. There is also an existing parking lot along the eastern boundary of the site. Paved roads connecting to commercial development north of the VCC Planning Area also occur on the site. The southern portion of the site includes ongoing agricultural uses. In addition, SCE and SoCalGas have distribution lines and access roads within easements on the site.

Land uses surrounding the VCC Planning Area include commercial and residential development, as well as vacant land. Castaic Junction is located immediately east of the Planning Area. Beyond that is vacant land. Residential development is immediately north of the VCC Planning Area. Commercial development is north, northwest, and west of the Planning Area in addition to vacant land. The Valencia Travel Village is south of the Planning Area between the SR-126 and the Santa Clara River. A commercial center and the California Highway Patrol Newhall Station are located southeast of the site between The Old Road and I-5. Hotel and commercial uses are located to the southeast across The Old Road. Los Angeles County Fire Station 76 and a small gas station are located between Henry Mayo Drive and SR-126, immediately west of the Castaic Junction off-ramp exiting SR-126. The development currently planned on vacant land south of the VCC Planning Area includes the proposed Entrada North community and the approved Mission Village community.

(3) Climate Change

A rapidly warming climate is expected to impact California and the Western United States from both direct and indirect effects. Since 2006, the State has monitored and created climate change assessments to assess the impacts and risks from climate change.

Based on California's Fourth Climate Change Assessment, published in 2019, the current average annual maximum daily temperature is projected to increase between 5.6 and 8.8 degrees by 2100.[3] The rising temperature is expected to result in increased heat waves in cities by 2050. The increased temperature and increased probability for heatwaves will impact electricity demand, especially in inland and Southern California. Climate change is also predicted to, directly and indirectly, increase the risk associated with public health resulting in earlier deaths and increased illnesses. Currently, there is not a strong consensus on how California as a whole will be impacted by changes in precipitation. The general trend indicates that the northern part of California will become wetter while the southern portion of California will become drier.[4] However, water supply from snowpack is projected to decline by at least 2/3 by 2100 due to less precipitation falling as snow; with water shortages occurring by 2050.[5] Further, over 3,000 miles of highways are projected to be exposed to temporary flooding because of increased 100-year storm events. Recent reports and studies on climate change in California include the City of Santa Clarita's *Climate Action Plan*, DWR's *Climate Action Plan, Phase 3: Climate Change Vulnerability Assessment*, the forthcoming SCV-GSA *Groundwater Sustainability Plan*, the Los Angeles Countywide Sustainability Plan, DWR's *California Water Plan Update 2018*, California's *Fourth Climate Change Assessment: Statewide Summary Report*.

The California Air Quality Resource Board (CARB) in 2020 completed a public draft assessment of the greenhouse gas emissions (GHG) and carbon impacts of wildfire and forest management activities. The report is a result of SB 901 which required CARB to assess and report the GHG emissions associated with wildfire and forest management activities. Since then, CARB has continued to track wildfire emissions. According to CARB's most recent fire emission modeling, wildfires transferred an average of 15 million metric tons of CO_2 ($MMTCO_2$) per year from plants into the atmosphere during 2000–2019. When including 2020 and 2021, the annual average is 22 $MMTCO_2$ per year. Fires in forests and woodlands are historically the largest contributors to wildfire-caused emissions due to higher fuel loads than in areas dominated by shrubs and grasses.[6] While in 2017, forest and shrublands had roughly equal areas of burned acres the fires in the forest

[3] *State of California, California's Fourth Climate Change Assessment Statewide Summary Report, 2019.*

[4] *State of California, California's Fourth Climate Change Assessment Statewide Summary Report, 2019, p. 25.*

[5] *State of California, California's Fourth Climate Change Assessment Statewide Summary Report, 2019, pp. 26–27.*

[6] *CARB, Frequently Asked Questions: Wildfire Emissions.*

created more than double the emissions. The 2020 fire season resulted in multiple large fires in forest areas and created record-high emissions with over 106 MMT of CO_2.[7]

Because wildfires can contribute to climate change via GHG emissions and be affected by climate change, the Fourth Climate Assessment also examined how climate change is expected to impact wildfires across the State.[8] Fire frequency and intensity are expected to be impacted by the rapidly changing climate; however, as wildfires are affected by multiple complex drivers the projections range from modest to large increases in wildfire regimes. The area burned by wildfire has been found to increase parallel to the increasing air temperatures. The average area burned may increase by 77 percent by 2100, if emissions continue to rise.[9] The statewide maximum burn area is projected to rise by 178 percent and extreme wildfires are predicted to occur 50 percent more often by the end of the century.[10] However, model projections regarding wildfire intensity, spread, and duration are limited. The changes to temperature, loss of snowpack, and earlier snowmelt are expected to result in dryer "dry" seasons and result in more susceptible forests. Wildfires are occurring at higher elevations and this trend is expected to be exacerbated by climate change.

Wildfire simulations found that forested areas, especially the Sierra Nevada, are projected to have the greatest increases in burned areas under extreme weather.[11] The burned area is likely to increase in conjunction with warming temperatures and has a stronger effect in montane forests in the northern two-thirds of the State. The increased burned areas were also found to be consistent with current experiences and trends already exhibited in the State and the western United States. Impacts to tree mortality as a result of fine fuels encroaching on forest canopy areas was only expected to have a small

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[7] *CARB, Wildfire Emission Estimates for 2020.*

[8] *A recent paper published by researchers at the University of California and other international institutions also suggests that nearly all of the observed increases in in forest fire burned areas over the past half-century is attributable to anthropogenic climate change. (See Turco, Marco, et al. "Anthropogenic climate change impacts exacerbate summer forest fires in California." Proceedings of the National Academy of Sciences 120.25 (2023): e2213815120, available at www.pnas.org/doi/epdf/10.1073/pnas.2213815120.)*

[9] *State of California, California's Fourth Climate Change Assessment Statewide Summary Report, 2019, p. 9.*

[10] *State of California, California's Fourth Climate Change Assessment Statewide Summary Report, 2019, p. 30.*

[11] *California Energy Commission, Wildfire Simulations for California's Fourth Climate Change Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate, A Report For: California's Fourth Climate Change Assessment, August 2018.*

increase from 1-7 percent in the near future and within the systems natural variability.[12] It was also found that depending on vegetation type and fuel amount the impact from climate viability changed demonstrating great spatial diversity in wildfire response to climate change.[13]

The Fourth Climate Assessment also prepared assessments based on regions to capture region-specific effects of climate change.[14] The Los Angeles Region includes all of Ventura, Los Angeles, and Orange Counties as well as the urbanized areas of San Bernardino and Riverside Counties. This region has a highly variable topography ranging from coastal plains to mountain ranges to desert areas. In the Los Angeles region, average maximum temperatures are projected to increase around 4 to 5 degrees by 2050 and 5 to 8 degrees by 2100.[15] As a result, the number of extremely hot days is also expected to increase across the region. By the late century, the hottest day of the year is predicted to be up to 10° F hotter for most locations across the region.[16] Precipitation is projected to only exhibit small changes in average precipitation amounts. However, extreme precipitation events, both wet and dry, are expected to increase. Areas are projected to experience a 25- to 30-percent rise in the wettest day of the year by the end of the century. As a result, the atmospheric river events are expected to see an increase in frequency and severity.[17]

Within southern California, Santa Ana winds are a unique climatic feature. These winds result in strong northeasterly downslope offshore winds that can be a catalyst for wildfire within the region. Santa Ana winds are most frequent in December and the strongest in January. These events have significant interannual variability and there have been no significant trends yet regarding a decline in their intensity, duration, and frequency.

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[12] *California Energy Commission, Wildfire Simulations for California's Fourth Climate Change Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate, A Report For: California's Fourth Climate Change Assessment, August 2018, p. 21.*

[13] *California Energy Commission, Wildfire Simulations for California's Fourth Climate Change Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate, A Report For: California's Fourth Climate Change Assessment, August 2018, p. 22.*

[14] *State of California, California's Fourth Climate Change Assessment Los Angeles Region Report, 2019.*

[15] *State of California, California's Fourth Climate Change Assessment Los Angeles Region Report, 2019, p. 9.*

[16] *State of California, California's Fourth Climate Change Assessment Los Angeles Region Report, 2019, p. 9.*

[17] *State of California, California's Fourth Climate Change Assessment Los Angeles Region Report, 2019.*

Wildfires in the Modified Project area are influenced by the Mediterranean climate, Santa Ana winds, drought, type and spatial distribution of vegetation, topography, large wildland/urban interfaces (WUI), fire suppression, and human activities within the Los Angeles region. According to California's Fourth Climate Change Assessment, nearly 80 percent of all wildfires currently occur in the summer and fall with a quarter of those fires happening under Santa Ana wind conditions. However, there remains significant uncertainty over how climate change will affect fire frequency and intensity in the region. Some future projections indicate that wildfires in the Los Angeles area will increase in burned areas by the mid-21st century with the burned area increasing 60 percent for Santa Ana-based fires and 75 percent for non-Santa Ana-based fires. According to the Fourth Climate Change Assessment, other climate projections using different statistical models found the average area burned to be much lower and that the annual area burned by the mid-century to increase by over 2000 hectares. Further, similar yet slight lower increases in wildfire areas burned were also projected to occur by the late 21st century as continued warming could cause an overall fuel decline in the region. These discrepancies highlight that there while wildfires are projected to increase in the Los Angeles Region there is still a large uncertainty about how exactly climate change will affect fires in this region and to what degree will wildfire frequency change.[18]

(4) Topography

The Modified Project Site is located in the Santa Clara River Valley, between the Santa Susana Mountains to the south and the Topatopa Mountains to the north. The Modified Project Site is topographically diverse with slope gradients ranging from moderate to steep in the hillsides to very gentle in the Santa Clara River floodplain and major tributary canyons.

The Entrada South Planning Area is located south of the Santa Clara River on rugged terrain dominated by steep slopes. It is dissected by four south–north-trending tributaries to the Santa Clara River, including one along Magic Mountain Canyon and three unnamed tributaries. All four tributaries exit the Entrada South Planning Area through natural drainages before eventually discharging into the Santa Clara River. Topographically, the southern portion of the site is dominated by several north–south-trending ridges. A narrow panhandle (roughly 330 feet wide) extends along the western portion of the site to a fairly level former pasture area.

[18] *State of California, California's Fourth Climate Change Assessment Los Angeles Region Report, 2019, p. 18.*

The VCC Planning Area is located north of the Santa Clara River and is dissected by two south–north-trending tributaries to the Santa Clara River: Castaic Creek and Hasley Creek. Both tributaries exit the VCC Planning Area through natural drainages before eventually discharging into the Santa Clara River. Topographically, the site is situated in relatively flat areas along Castaic Creek and within the lower elevations of Hasley Canyon. The remaining portions of the site have greater topographic relief. Site elevations range from approximately 990 feet above mean sea level (amsl) along the Castaic Creek bottom to approximately 1,210 feet amsl at the top of the north-central ridge.

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower spread down-slope. Terrain that forms a funneling effect, such as chimneys, chutes, or saddles on the landscape can result in especially intense fire behavior, including faster spread and higher intensity. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by vegetation and wind. Topographic features that may present a fire spread facilitator are the slope and canyon alignments, which may serve to funnel or channel winds, thus increasing their velocity and potential for influencing wildfire behavior. From a regional perspective, the alignment of the Santa Clara River floodplain, tributary canyons, and dominant ridges are conducive to channeling and funneling wind, thereby increasing the potential for more extreme wildfire behavior in the region. Additionally, slope failures, mudflows, and landslides are common in areas with steep hillsides and embankments. These conditions would be exacerbated in a post-fire environment where vegetation cover has been burned off. Given the Modified Project's location in a fire-prone area, occupants and structures could be exposed to downslope or downstream flooding or landslides that are a result of post-fire conditions. The Rye Fire in 2017 was ~~the most~~ a recent fire to burn onto the Modified Project Site. Surveys conducted by Dudek in 2019 concluded that the vegetation has regenerated since the 2017 Rye Fire, thus stabilizing the surrounding slopes. In 2025, the Hughes Fire burned approximately 2 to 4 miles north of the VCC Planning Area. Both planning areas are within identified liquefaction zones; the Entrada South Planning Area is bisected by a liquefaction zone and the Valencia Planning Area is almost completely zoned as a liquefaction area.[19] Many of the ridgelines in the planning areas are also identified as having the potential for earthquake-induced landslides.[20] However, neither planning area shows evidence of landslide or slope slippage activity.[21]

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[19] *County of Los Angeles, Liquefaction Zones Map, 2020.*

[20] *County of Los Angeles, Landslide Zones Map, 2021.*

[21] *California Geologic Survey, Landslides Inventory Map, 2024.*

(5) Vegetation and Land Cover

Vegetation distribution throughout the Modified Project Site varies by location and topography. However, vegetation on the Modified Project Site primarily consists of annual grassland, scrub and chaparral habitat, and riparian forest. Human-created land cover types, such as agriculture and disturbed land, were also previously mapped on the Entrada South and VCC Planning Areas. These vegetation community and land cover types were confirmed by Dudek fire protection planners in the field. The existing vegetation communities in the Entrada South Planning Area and the VCC Planning Area are illustrated in Figure 4a and Figure 4b of the FPP, respectively, in **Appendix 5.14a**.

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (leaf size, branching patterns), and overall fuel loading. For example, the native shrublands that compose the coastal scrub community on the Modified Project Site are a high potential hazard based on such criteria.

A critical factor to consider is the dynamic nature of vegetation communities. Fire presence and absence at varying cycles or regimes affect plant community succession. Succession of plant communities, most notably the gradual conversion of shrublands to grasslands with high-frequency fires and grasslands to shrublands with fire exclusion, is highly dependent on the fire regime. Biomass and associated fuel loading increase over time, assuming that disturbance or fuel reduction efforts are not diligently implemented.

Wildfire disturbances can also have dramatic impacts on plants and plant composition. Heat shock, accumulation of post-fire charred wood, and change in photoperiods due to removal of shrub canopies may all stimulate seed germination. The post-fire response for most species is vegetative reproduction and stimulation of flowering and fruiting. The combustion of aboveground biomass alters seedbeds and temporarily eliminates competition for moisture, nutrients, heat, and light. Species that can rapidly take advantage of the available resources will flourish. It is possible to alter successional pathways for varying plant communities through manual alteration (**Appendix 5.14a**).

(6) Fire Hazard Severity Zone Designation

CalFire's Fire and Resource Assessment Program (FRAP) database provides data documenting areas of significant fire hazards throughout the state pursuant to PRC Sections 4201–4204. Geographic areas of the state are classified as Very High, High, or Moderate FHSZs. These areas are also classified for Local Responsibility Areas, State Responsibility Areas, and Federal Responsibility Areas. These are areas where the local,

state, or federal government assume financial responsibility for fire prevention and protection.

As presented in **Figure 5.14-1**, Fire Hazard Severity Zones, on page 5.14-42, the Modified Project Site is located in an area designated by County Fire and CalFire as a VHFHSZ, which remains unchanged from the 2017 Project. Fire hazard severity classifications take into account vegetation, topography, weather, crown fire production, steep terrain, and ember production and movement. The VHFHSZ designation can be attributed to a variety of factors, including highly flammable, dense, drought-adapted chaparral vegetation; seasonal, strong winds; and a Mediterranean climate that results in dry vegetation during the fall months.

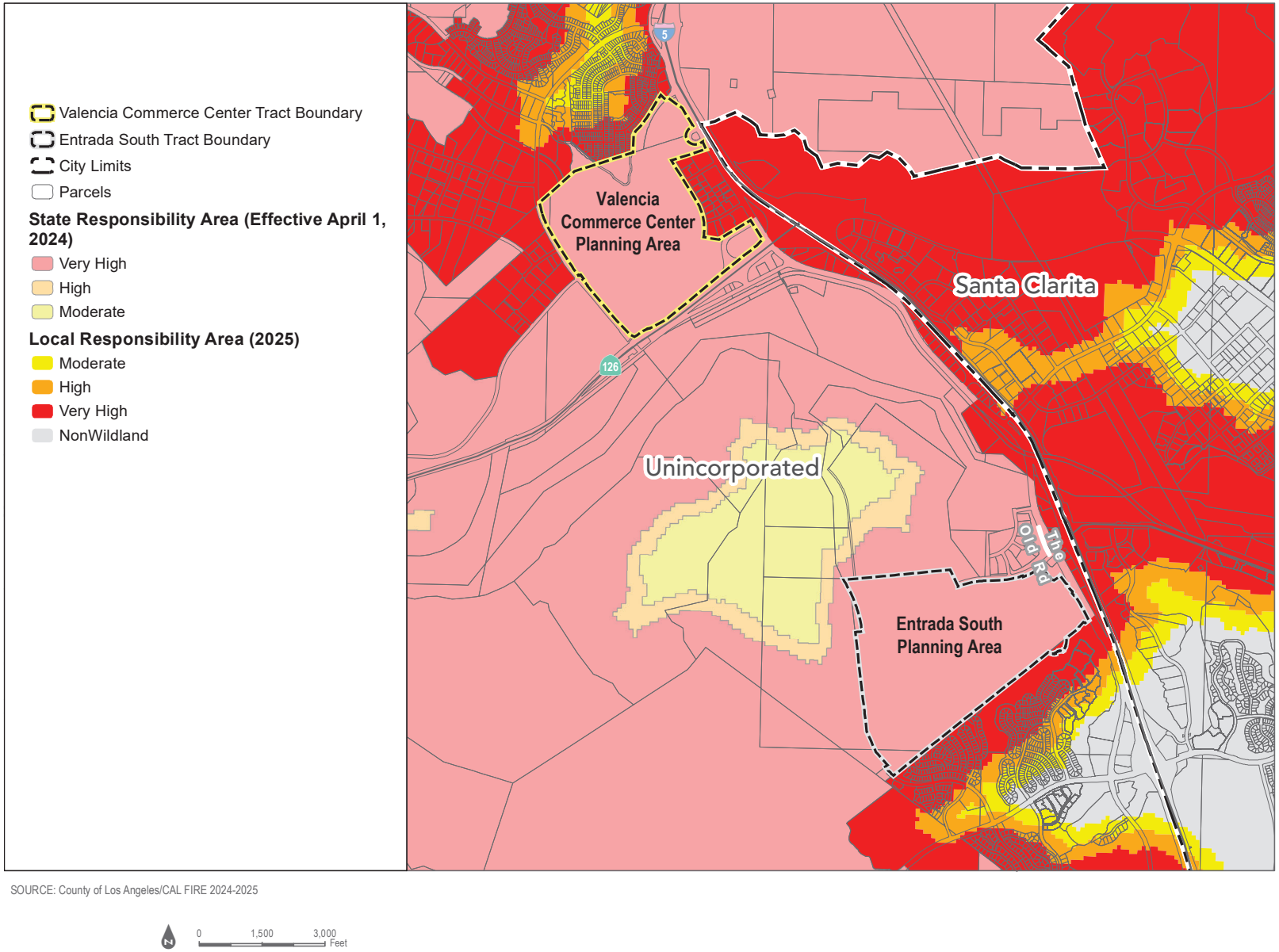
In late 2022 CalFire released a draft, updated FHSZ map for the SRA~~, followed by an amendment to the draft maps in early 2023 based on public input~~. ~~Although the maps are not finalized at the time of this document's population,~~ On April 1, 2024, the final revised FHSZ map for the SRA became effective,[21A] the Modified Project Site is located within areas designated as VHFHSZ ~~in the released drafts~~ the revised map, consistent with the designation in the prior FHSZ map.

(7) Historic Context

Historic fire data provides valuable information regarding fire spread, fire frequency, fire type, vulnerable areas, and significant ignition sources. Fire history data provided by CalFire's FRAP database summarizes fire perimeter data dating to the late 1800s for fires larger than 10 acres in size. Despite the lack of data for smaller fires and the incomplete perimeter data, FRAP can be used to show whether large fires have occurred in an area, which is an indicator of the potential for future wildfires.

According CalFire's FRAP data as described in the FPP, ~~180~~ 185 wildland fires burned in a 5-mile vicinity of the Modified Project Site since the beginning of the historical fire data records (CalFire 2020). Recorded wildfires ranged from 0.1 acre to 115,537 acres (1970 Clampitt Fire). The average fire size is 3,340.9 acres (not including the 1970 Clampitt Fire or fires smaller than 10 acres). The 2020 Hasley Fire (6.7 acres) and the 2020 Equestrian Fire (85 acres) are the most recent fires~~, which~~ that occurred adjacent to the Entrada South and VCC Planning Areas, whereas the 2025 Hughes Fire occurred approximately 2 to 4 miles north of the VCC Planning Area. According to CalFire, the Hughes Fire totaled 10,425 acres and was an active fire for 8 days between January 22 and

[21A] *California Natural Resources Agency, Fire Hazard Severity Zones, in SRA Effective April 1, 2024, https://data.cnra.ca.gov/dataset/fire-hazard-severity-zones-in-sra-effective-april-1-2024-with-lra-recommended-2007-2011.*



SOURCE: County of Los Angeles/CAL FIRE 2024-2025

eyestone ENVIRONMENTAL

Revised Figure 5.14-1
Fire Hazard Severity Zones

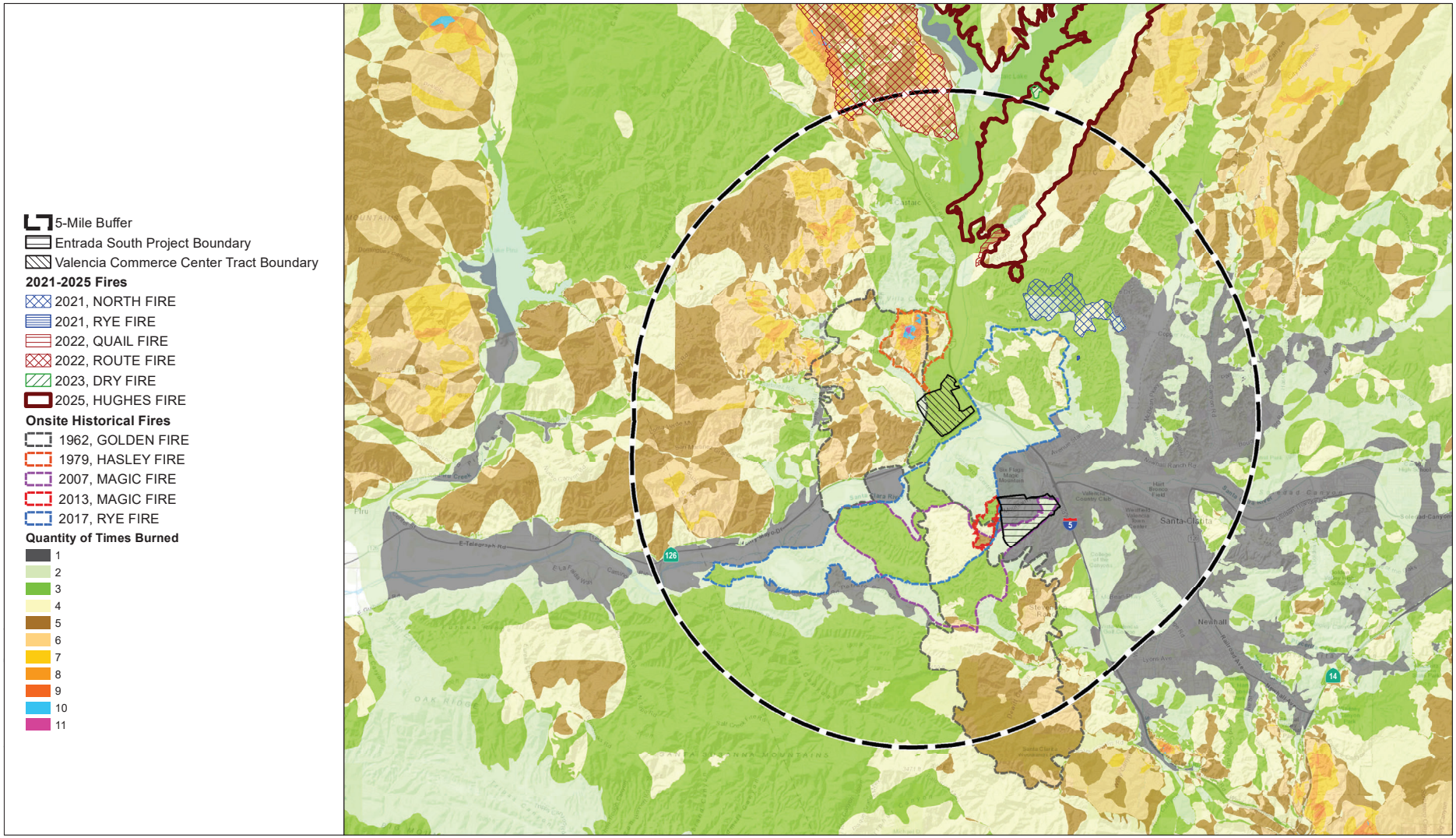
Source: Dudek, 2025.

January 30, 2025. The 2017 Rye Fire (6,068 acres), the 2007 Magic Fire (2,825 acres) and 2013 Magic Fire (145 acres) burned onto the Entrada South Planning Area. Large historic fires include the 1962 Golden Fire and the 1979 Hasley Fire—with a total burned area of approximately 9,233 acres and 656 acres, respectively—burned onto the VCC Planning Area. Additionally, the 2022 Route Fire (5,208 acres) occurred approximately four to five miles north of the Modified Project Site. Fire history for the general vicinity of the Modified Project Site and fires that have burned onto the Modified Project Site are illustrated in **Figure 5.14-2**, Fire History Map, on page 5.14-44.

Based on the FRAP, the average interval between wildfires within 5 miles of the Modified Project Site's boundaries is 1 year, with intervals ranging from 0 years (multiple fires in the same year) to 2 years. Based on this analysis, it is expected that portions of the 5-mile study area will be subject to wildfire on at least an annual basis, with those wildfires encroaching upon the Modified Project Site at a longer interval. The proximity of the Modified Project Site to large expanses of open space to the south in the Santa Susana Mountains and potential ignition sources along major travel routes, including I-5, SR-126, and the Valencia and Santa Clarita areas, contribute to increased potential wildfire hazard in the area. Additionally, the terrain within the Santa Clara River Valley, including multiple sub-drainages and canyons, has the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazards in the region.

However, historic data relating to wildfires that have threatened master-planned communities, such as the Modified Project, is particularly relevant. For example, the Stevenson Ranch community, located less than 1 mile south of the Modified Project Site, has been previously threatened by multiple wildfires. Stevenson Ranch emerged unscathed from the 2003 Simi Fire, which burned 108,204 acres in Ventura and Los Angeles Counties. Stevenson Ranch, like many newer master-planned communities in Los Angeles County, is a product of a concerted effort by County Fire and other County agencies to address wildfire through a multi-pronged approach that includes land planning, project design measures, strict fire codes, robust fire-fighting response, and ongoing hazard reduction efforts.[22] Per County Fire's 2022 Strategic Fire Plan, County Fire's mission of protecting lives, the environment, and property by providing prompt, skillful, and cost-effective fire protection and life safety services includes a coordinated effort of sound planning, a well-trained and capable fire response, and continuously updated fire codes and fire safety requirements imposed on all new development. Thus, the combination of rapid and aggressive action by County Fire, along with rigorous building standards and fuel

[22] *Murphy, Dean E., "In California's Inferno, an Oasis of Fire Safety Planning Standards Stands Out," New York Times, 2003,*



eyestone ENVIRONMENTAL

Revised Figure 5.14-2
Fire History Map

Source: Dudek, 2025.

modification requirements ensured the protection of Steven Ranch, like other new master-planned communities, as discussed more in the FPP.

(8) Existing Sources of Ignition

Existing sources of ignition in the Modified Project area include vehicles traveling along major travel routes (i.e., I-5 and SR-126) and local roads, human activity in nearby commercial areas and residential neighborhoods, arson-related activities, and accidental ignitions. Additionally, (SCE and SoCalGas have transmission corridors within easements on the Modified Project Site. SCE actively maintains the easements/transmission lines and access roads.

(9) Development in the Wildland Urban Interface

As explained in Section 5 of the FPP, research has indicated that increased human activity in WUI areas can result in an increased likelihood of ignition. As such, residential development within fire-prone areas is commonly characterized as a driver of wildfire risk. The relationship between human activities and natural dynamics has contributed to altering fire regimes. One alteration is that urban development increases the risk of repeated fires on the landscape. However, the number of ignitions and the area burned varies by an ignition source. Overall, human-caused ignitions peaked in 1980 and have since dropped likely due to increased efficiencies in fire prevention, changes in infrastructure, a decline in smoking, neighborhood watch program, penalties for arsonists, and new developmental rules. In addition, as discussed above and in the FPP, many newer master-planned communities in or near the WUI have been highly resistant to wildfire impacts as a product of a concerted effort by County Fire and other County agencies to address wildfire through a multi-pronged approach that includes land planning, project design measures, strict fire codes, robust fire-fighting response, and ongoing hazard reduction efforts.

3. SUMMARY OF IMPACTS FOR THE 2017 PROJECT

On-Site Wildfire Risks—Section 4.17, Hazards, Hazardous Materials, and Public Safety, of the State-certified EIR analyzed impacts pertaining to wildland fires resulting from development of the Entrada South and VCC Planning Areas, and impacts associated with developing residential, commercial, and non-residential land uses, public facilities, infrastructure, open space, and recreation facilities. The State-certified EIR concluded that impacts would be significant but reduced to a less than significant level within the Entrada South and VCC Planning Areas with implementation of regulatory compliance based Mitigation Measures RMDP/SCP-PH-7, which requires secondary access routes in accordance with the County Code, and Mitigation Measures RMDP/SCP-PH-14, which requires a Wildfire Fuel Modification Plan in accordance with the fuel modification standards in the County Fire Code at the time of final subdivision map permitting.

Off-Site Wildfire Risks—The State-certified EIR also analyzed the potential for development of the Entrada South and VCC Planning Areas to cause off-site impacts related to both emergency response and emergency evacuation plans and related to wildland fires. The State-certified EIR determined that the 2017 Project would not result in significant off-site impacts related to these topics.[23]

4. REGULATORY REQUIREMENTS AND PROJECT DESIGN FEATURES

a. Regulatory Measures

The Modified Project's design would comply with applicable County Code fire safety requirements, identified above regarding site design, site and building access, roadways and driveways, structure ignition resistance in VHFHSZs, fire sprinkler systems, fire hydrants, and access gates, as well as other applicable Fire Code requirements. Specifically, the following regulatory compliance measures would be implemented:

- The Modified Project shall be designed and constructed in accordance with the County of Los Angeles Fire Code (Los Angeles County Code, Title 32), which incorporates by adoption the CFC, and the regulations of the County Fire Department, which include standards for building construction that would reduce the risk of fire hazards and facilitate emergency response.

- Per County 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 of Fire Department for review and approval prior to the recordation of the final map or the approval of a building permit.

- Per County Fire Code Sections 404.3.2 and 408.7.5, following construction and prior to the issuance of the first certificate of occupancy, the Modified Project Applicant shall submit an Emergency Response Plan for approval by the County 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.

- The Modified Project Site is located in a VHFHSZ and shall require implementation of a Fuel Modification Plan. A Fuel Modification Plan that shows the Modified Project Site plan, delineates fuel modification zones around structures, and details the proposed landscaping and ongoing maintenance shall be submitted to the County Fire Department for review and approval by the Forestry Division. Proposed fuel modification zones have been prepared for the

[23] *Final State-certified EIR, p. 4.17-62.*

Modified Project (see **Figure 5.14-3**, Entrada South Planning Area Fuel Modification Map, on page 5.14-48, and **Figure 5.14-4**, VCC Planning Area Fuel Modification Map, on page 5.14-49) in accordance with the County of Los Angeles Fire Department's Fuel Modification Plan Guidelines. The proposed fuel modification zones (Zones A, B, and ERZ) would be established to provide adequate defensible space in a fire environment.

- Site access for the Modified Project shall be designed and constructed in accordance with Los Angeles County Code, Title 21, Chapter 21.24, including the provision of adequate site access, wildland access, and appropriate roadway and cul-de-sac lengths and widths, as determined by the County Fire Department.

b. Project Design Features

The Modified Project includes the following Project design features (PDFs) relevant to fire safety, wildfire protection, emergency access, and emergency evacuation:

PDF-WF-1: Prior to any construction activities, a detailed Construction Fire Prevention Plan (CFPP) shall be prepared for the Modified Project and submitted to the Los Angeles County Fire Department (County Fire) for review and approval. The CFPP shall designate fire safety measures to reduce the possibility of fires during construction activities, including fire watch during hot works and heavy machinery activities (e.g., welding), spark arresters on all equipment, water supply via hose lines attached to hydrants, or a water tender pursuant to County Fire requirements, red flag period restrictions, and mandatory on-site fire resources. Employees would be presented with basic prevention fire training upon employment and the on-site safety officer and/or supervisor/foreman shall maintain documentation of training. Training shall include reviewing the Modified Project's Fire Protection Plan, and Occupation Safety and Health Administration (OSHA) Fire Protection and Prevention guidance on the proper response and notification of a fire and the use of fire extinguishing equipment. A site safety officer shall be responsible for the implementation of the CFPP, ensuring fire control equipment are maintained in good working conditions, monitoring combustibles onsite, conducting fire safety surveys, posting fire rules in an area visible to employees, stopping work activities that pose a fire hazard or are not in compliance with the CFPP, and reporting all fire ignited on site to County Fire.

SOURCE: ESRI 2019; Hunsaker 2019

0 285 570 Feet

eyestone ENVIRONMENTAL

Figure 5.14-3
Entrada South Planning Area Fuel Modification Map

Source: Dudek, 2022.

SOURCE: ESRI 2019; Hunsaker 2021

0 400 800 Feet

eyestone ENVIRONMENTAL

Figure 5.14-4
VCC Planning Area Fuel Modification Map

Source: Dudek, 2022.

PDF-WF-2: Prior to bringing lumber or combustible materials related to building construction onto the Modified Project Site, site improvements within the active development area shall be in place, including utilities, operable fire hydrants, and an approved, temporary roadway surface and fuel modification zones shall be established. Combustible materials may be utilized on-site prior to stated site improvements as needed for providing the improvements (e.g., wood forms for cast-in-place concrete). The applicant shall submit site improvement plans to County Fire prior to the issuance of the building permits.

PDF-WF-3: All vegetation management with the Fuel Modification Zones (FMZs) and common areas shall be completed annually by May 1 of each year. Vegetation management may be completed more often for fire safety if determined necessary by County Fire. The Modified Project Homeowners' Association (HOA) or equivalent entity shall be responsible for the annual maintenance of all vegetation management within the FMZs in the common areas ensuring compliance with Los Angeles County Fire Department (County Fire) fuel modification guidelines. Property owners will be responsible for maintaining the Ember Resistant Zone (ERZ) and any fuel modification within their property. The annual maintenance would be managed and maintained by the Modified Project HOA through a qualified contractor that shall be required to meet fire safety requirements regarding equipment, the timing of maintenance, and fire suppression capabilities. Maintenance activities would include but not be limited to removing dead and dying material, removing undesirable plant species, and conducting thinning activities to maintain adequate spacing requirements. The Modified Project HOA or similar entity shall be responsible for ensuring the long-term funding and ongoing compliance with all provisions of the Fire Protection Plan (FPP) including, vegetation planting, fuel modification of the perimeter areas, vegetation management on all common areas including roadsides, and open space areas under their control (if not considered Entrada Spineflower Preserve). The Modified Project HOA shall be responsible for the implementation of the annual FMZ maintenance subject to ongoing enforcement by County Fire.

PDF-WF-4: By June 1 of each year, a third-party inspector shall be hired by the Modified Project Homeowners' Association (HOA) or equivalent entity to conduct an annual inspection of the Fuel Modification Zones (FMZs), including the Ember Resistant Zone (ERZ) and FMZs that are within private property. The inspector would evaluate the FMZs for compliance with regulations and that they are operating accordingly. The inspector shall notify the HOA of any non-compliant FMZs, recommend measures for remediation, and a timeframe for reinspection. The Modified Project HOA shall be responsible for the long-term funding of the inspections. An inspection report shall be

submitted to the Los Angeles County Fire Department each year documenting inspection results and compliance with County FMZ requirements.

PDF-WF-5: The Modified Project residents and occupants shall be provided with ongoing education regarding wildfire, the Fire Protection Plan (FPP), and the Wildfire Fire Evacuation Plan. The education program would support fire safety, evacuation practices, and fire safety features designed for the community. The Wildfire Education Program would provide target outreach to residents and occupants living in a fire risk area and would be a layered approach to maintaining high wildfire risk awareness that includes active and passive features. Contents of the educational program would be reviewed and approved by Los Angeles County Fire Department (County Fire) before printing and distribution. The Modified Project Homeowners' Association (HOA) or similar entity shall be responsible for the ongoing funding and maintenance of the wildfire education program. The educational program shall consist of the following:

1. **Bi-annual email and mailers:** Residents and occupants will be provided with bi-annual emails and mailers in April and in August. Mailers would be sent to each property address and property owners would receive digital copies. Property owners would be highly encouraged to share this information with tenants should they choose to rent their property. The mailers and emails would include information such as reminders about annual defensible space inspections, maintaining the Ember Resistant Zone (ERZ), how to prepare for wildfire season, evacuation information, and how to prevent wildfires. There would also be links to various resources on where to get trusted information such as County Fire, 211 LA County, and Ready LA County.
2. **Website:** There shall be a dedicated community website with more detailed information and resources about wildfire awareness and prevention. The website would serve as a centralized resource for the fire education program and include information from the FPP. The website will also have fire watch and red flag warning alerts, as well as information on restrictions during fire weather conditions. Residents will also be able to use the website to sign up for an annual residential defensible space inspection from the HOA Fire Committee.
3. **Community workshops and webinars:** Two times a year there shall be either in-person or virtual community workshops. The goal of the workshops would be to cover various fire topics more in-depth. For example, this could include having a County Fire representative come to meet the community, a workshop on how to

make a go-bag, a workshop on how to make a residential evacuation plan, or how to maintain the home ignition zone.

4. **New resident packet:** All residents and new residents in the future shall also be presented with a wildfire awareness and safety package upon purchase or rental of a home. This would also be given to businesses as part of their employee training program. Within the package will be a memory stick with the evacuation plan, a list of fire protection features, information on the regional fire hazard, prohibited activities in fire risk areas, how to build a go-bag, and a list of agencies and resources for receiving trusted information.
5. **Emergency alert campaign:** Residents and businesses would be encouraged to sign up for Alert LA County. Alert LA County is the mass notification system for emergency alerts, weather alerts, health notifications, building alerts, and other updates from County, State, and Federal agencies alerts, health notifications, building alerts, and other updates from County, State, and Federal agencies. The campaign shall occur annually and encourage residents to sign up for Alert La County. Reminders would also be sent out in the bi-annual mailers and emails, on the community website, in the workshops, and the new resident package.
6. **Fire watch groups:** Within the community, there shall also be volunteer fire watch groups. These would be residents or businesses who volunteer to participate in a fire watch group for the community. During red flag warning days, this group would be responsible for reminding businesses and residents of fire-safe practices and restrictions. During red flag warning days, the fire watch group would also maintain vigilance of potential fires and would be trained on procedures for alerting County Fire in the event of a fire.
7. **HOA fire safety committee:** The fire safety committee shall be responsible for overseeing the maintenance of community-wide fire protection features. Residents would be able to report fire hazards or hazardous fuel conditions to the HOA committee for remediation. The committee will be responsible for the coordination of the 3rd party Fuel Modification Zone (FMZ) inspections and the volunteer residential defensible space inspections. The committee shall also be responsible for organizing and coordinating an annual education workshop on how to maintain the ERZ. The committee shall also be responsible for the creation and distribution of the educational program for the Modified Project. The committee would serve as a communication link between County Fire and the community.

PDF-WF-6: The Modified Project shall formally adopt, practice, and implement a “Ready!, Set!, Go!” approach to evacuation through the creation of a

Wildfire Evacuation Plan (WFEP) for the Modified Project. The WFEP would be based on standard evacuation planning used by the Los Angeles County Office of Emergency Services and provide residents and occupants with potential egress route information and procedures. The WFEP would be provided to the Entrada South and VCC residents and commercial tenants and posted on the community website. The WFEP would be reviewed by residents at least annually through organized meetings and educational outreach by the HOA, Community Services District, or other means.

A CFPP has been prepared for the Modified Project and is included in **Appendix 5.14c**. An Evacuation Plan for the Modified Project has also been prepared and is included in **Appendix 5.14b**.

5. THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines and other relevant criteria, the Los Angeles County Department of Regional Planning has determined that a project would have a significant impact related to wildfire based on the following criteria:

Threshold 5.14-1: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Threshold 5.14-2: Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Threshold 5.14-3: 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?

Threshold 5.14-4: 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?

Threshold 5.14-5: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or result in the need for new or physically altered governmental facilities, the construction of which could cause

significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?

Threshold 5.14-6: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a high fire hazard area with inadequate access?

ii) within an area with inadequate water and pressure to meet fire flow standards?

iii) within proximity to land uses that have the potential for dangerous fire hazard?

Threshold 5.14-7: Does the proposed use constitute a potentially dangerous fire hazard?

As discussed in the Initial Study prepared for the Modified Project (**Appendix 1**), the Modified Project would not result in new or substantially more severe significant impacts related to an adopted emergency response plan or emergency evacuation plan as compared to the 2017 Project. Accordingly, the Initial Study analysis concluded no further analysis of this issue pursuant to Threshold 5.14-1 is required. Please refer to the Initial Study for discussion related to Threshold 5.14-1. Thus, no further analysis of this issue is necessary or provided herein.

6. ENVIRONMENTAL IMPACTS OF THE MODIFIED PROJECT

a. Methodology

(1) Construction—On-Site and Off-Site Wildfire Risks

Construction of the Modified Project would be similar to construction of the 2017 Project. As with the 2017 Project, the Modified Project would involve development of residential, industrial/commercial, public facilities, recreational, and open space uses within the Entrada South and VCC Planning Areas. Thus, development of the Modified Project would result in a similar intensity of development compared to the 2017 Project. Nonetheless, this SEIR and the FPP includes supplemental analysis, including fire modeling data and additional information about wildfire risks, to determine if the Modified Project may result in any new significant wildfire-related impacts (on-site and off-site) that were not previously identified in the State-certified EIR for the 2017 Project.

(2) Operational—On-Site Wildfire Risks

Operation of the Modified Project would be similar to operation of the 2017 Project. As with the 2017 Project, the Modified Project would involve residential, industrial/ commercial, public facilities, recreational, and open space uses within the Entrada South and VCC Planning Areas. Thus, development of the Modified Project would result in a similar intensity of development compared to the 2017 Project. Nonetheless, this SEIR and the FPP includes additional information about wildfire risks to determine if the Modified Project may result in any new significant wildfire-related impacts that were not previously identified in the State-certified EIR for the 2017 Project. Topics analyzed include project-related distribution power lines, vehicle-related spark failure or another ignition sources, potential fire spread from ignition sources to roadsides and into unmaintained fuel areas, machinery during operational phases of the Modified Project, vegetation management, community education, and evacuation planning.

As part of the FPP's analysis, Dudek reviewed available digital information for the Modified Project area, including topography, vegetation types, fire history, and the Modified Project's development footprint. Dudek also conducted a field assessment of the area on December 18, 2019, and again during September and October 2021. As part of this assessment, Dudek conducted vegetation estimates and mapping refinements, fuel load analysis, topographic features documentation, photograph documentation, confirmation/ verification of hazard assumption, ingress/egress documentation, and identification of regional land uses, existing communities, potential vulnerabilities.

Further, to inform the evaluation of impacts relative to wildfire, the FPP includes modeling of pre- and post-development conditions to document the type and intensity of fire that would be expected to occur in the vicinity of the Modified Project Site, given characteristic features such as topography, vegetation, and weather. Specifically, the BehavePlus software package, Version 5.05, was used to evaluate fire behavior variables and to objectively predict flame lengths, intensities, and spread rates for three modeling scenarios for Entrada South and three modeling scenarios for VCC, with assumptions made for the pre- and post-development fuel conditions. These fire scenarios incorporated observed fuel types representing the dominant on-site and off-site vegetation, in addition to measured slope gradients, and wind and fuel moisture values derived from Remote Automated Weather Stations weather data sets (Del Valle Station, ID No. 045445) for both the 50th percentile weather (onshore winds) and the 97th percentile weather (offshore winds).

The modeling provided a worst-case wildfire behavior condition as part of a conservative approach. The results of the wildfire behavior modeling for three different fire scenarios near the Entrada South Planning Area under existing conditions are presented in

Table 5.14-2, BehavePlus Modeling Results—Existing Conditions for Entrada South Planning Area, on page 5.14-66 further below.

(3) Operational—Off-Site Wildfire Risks

This SEIR and Section 5 of the FPP evaluated whether the Modified Project could result in off-site fire risks. In Section 5.2 of the FPP, Dudek prepared a site-specific assessment of the Modified Project's off-site ignition risk. Dudek evaluated potential off-site fire risks from the Modified Project utilizing best practices, extensive research, publicly available and project-specific fire environment data, and years of professional experience to consider the risk factors and various fire protection measures. Dudek considered regional characteristics including climate, shrub dominated vegetation, and variable topography, along with the multi-layered mitigation and design measures implemented by the Modified Project, as well as features of adjacent communities.

(4) Evacuation

The Evacuation Plan, provided in **Appendix 5.14b,** analyzes various evacuation scenarios and calculates the potential increase in evacuation times associated with development of the Modified Project compared to the 2017 Project. The Evacuation Plan was developed based on wildfire and evacuation standards and the County of Los Angeles evacuation procedures. The plan provides evacuation information evacuation routes and emergency access that will be available to them during a wildfire emergency. Stantec assessed the Modified Project's consistency with the Area Plan's circulation, access and evacuation framework for the Santa Clarita Valley in the Access and Evacuation Memo, provided in **Appendix 5.14d**.

For reference, the FPP included as **Appendix 5.14a** provides an overview of how the applicable wildfire Mitigation Measures (described in Section 8, below), Project Design Features (described in Section 4.b, above), and regulatory compliance measures (described in Section 4.a, above) relate to the impact criteria discussed in this Section (i.e., Section 6).

b. Project Impacts

Threshold 5.14-2: Due to slope, prevailing winds, and other factors, would the Modified Project exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

As described in the FPP, the Modified Project does not include modifications to the 2017 Project that would substantially exacerbate wildfire risks compared to those identified in the State-certified EIR:

- The Modified Project does not introduce construction activities, land uses or operational features that substantially increase the risk of initiating fires or facilitating wildfire spread compared to the 2017 Project.
- With 151 fewer proposed residential units than the 2017 Project, the Modified Project would not introduce a greater number of new residents to a VHFHSZ or the WUI or increase ignition sources associated with new residents compared to the 2017 Project.
- The Modified Project includes new PDFs that would have the benefit of further reducing wildfire risks compared to the 2017 Project.

However, to provide additional discussion, the following considers whether construction activities or operation of the Modified Project would exacerbate wildfire risks that, in turn, would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

(1) Construction

As with the 2017 Project, the existing topography and climate present conditions that may facilitate the spread of wildfire on the Modified Project Site during construction. Construction activities in fire-prone environments can potentially introduce factors that could exacerbate wildfire risk by introducing construction equipment, construction activities (e.g., welding) or construction vehicle traffic that could introduce new ignition sources.

The Modified Project's construction activities would be substantially similar to the 2017 Project's construction activities. As with the 2017 Project, the Modified Project Site is surrounded by existing and planned development. There is substantial development near the Entrada South Planning Area, including I-5 to the east, Six Flags Magic Mountain theme park and SR-126 to the north, the approved Mission Village community (under construction) to the west, and the existing Westridge community to the south, along with secondary road infrastructure to the south, east, and north. Land uses surrounding the VCC Planning Area include commercial, light industrial, and residential development as well as vacant land with limited vegetative cover. Existing mixed use development is located immediately north of the VCC Planning Area and commercial development is north, northwest, and west of the VCC Planning Area, along with SR-126 to the south. The surrounding development reduces the risk of both encroaching fires and off-site fire spread during construction.

As with the 2017 Project, the Modified Project would comply with County Fire requirements for construction activities in hazardous fire areas and the California Fire Code, which requires a variety of construction measures to reduce fire risk, including requiring spark arrestors on all equipment with a solid or liquid fuel motor. For example, as with the 2017 Project, the Modified Project would comply with Section 326.12.1 of the County Fire Code, which prohibits the use or operation of any tractor, construction equipment, engine, machinery, or any steam, oil, or gasoline-operated stationery or mobile equipment, from which a spark or fire may originate unless such equipment is provided with a qualified device or spark arrester installed in or attached to the exhaust pipe which will prevent the escape of fire or sparks. The Modified Project would also comply with Chapter 33 of the California Fire Code, Fire Safety During Construction and Demolition, including Section 3304 thereof, which obligates the Modified Project to satisfy various standards that limit ignitions, including, but are not limited to, prohibiting smoking except in approved areas, preventing the accumulation of and removing combustible debris, implementing fire watch personnel (where recommended by County Fire), providing on-site water supplies, and maintaining vehicle access for firefighting to all construction and demolition area.

In addition to regulatory compliance, the Modified Project includes measures that would further enhance wildfire safety during construction. Specifically, on- and off-site construction impacts from the Modified Project would be reduced by PDF-WF-1 and PDF-WF-2.

(a) On-Site Impacts

- Pursuant to PDF-WF-1, prior to any construction activities, a detailed CFPP will be submitted to County Fire for review and approval (see Appendix 5.14c for the CFPP). The CFPP identifies fire safety measures to reduce the possibility of fires during construction activities, including fire watch during hot works and heavy machinery activities, spark arresters on all equipment, water supply via hose lines attached to hydrants (or a water tender pursuant to County Fire requirements), red flag period restrictions, and mandatory on-site fire resources. The CFPP requires employees to receive fire prevention training, which would consist of review of the Modified Project's relevant regulatory requirements and fire safety provisions, review of OSHA Fire Protection and Prevention procedures, proper response and notification of a fire, and the use of fire extinguishing equipment.

- PDF-WF-2 requires that prior to bringing lumber or combustible materials related to building construction onto the Modified Project Site, site improvements within the active development area must be in place, including utilities, operable fire hydrants, and an approved, temporary roadway surface and fuel modification zones. Combustible materials would only be utilized on-site prior to these stated

site improvements as needed for providing the improvements themselves (e.g., wood forms for cast-in-place concrete).

(b) Off-Site Impacts

- In addition to reducing on-site fire risks, PDF-WF-1 and PDF-WF-2 would reduce the risk of a fire that began on the Modified Project Site during construction from migrating off-site. The ignition reduction requirements imposed by applicable regulations and the CFPP, as well as the fire-watch and employee education aspects of the CFPP, would minimize the risk of airborne embers originating on the Modified Project Site and migrating off-site. Further, fuel modifications (which must be in place for construction) would limit the risk of embers traveling to off-site fuel loads.

Wildfires have the potential to increase emissions of pollutants, including particulate matter pollutants. If a project does not significantly exacerbate the risk of wildfire, the project would not expose project occupants to increased pollutant concentrations from wildfires. In this case, the Modified Project would not exacerbate wildfire risks compared to the 2017 Project. The Modified Project will also include PDFs that further reduce wildfire risks compared to the 2017 Project. Therefore, the Modified Project would not expose project occupants to increased pollutant concentrations from wildfires.

As with the 2017 Project as described in the State-certified EIR, potential on-site and off-site wildfire impacts due to on-site construction from the Modified Project would be less than significant with regulatory compliance and mitigation. PDF-WF-1 and PDF-WF-2 would provide additional benefits by reducing wildfire risks compared to the 2017 Project. The Modified Project would not exacerbate wildfire risks compared to the 2017 Project that could have the potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The Modified Project would not result in any new or substantially more severe significant impacts during construction related to Threshold 5.14-2 as compared to the State-certified EIR for the 2017 Project.

(2) Operation

As with the 2017 Project, the Modified Project has the potential to contribute to wildfire impacts because the topography and climate present conditions that may facilitate the spread of wildfire, and development in very high fire areas can potentially introduce factors that could exacerbate wildfire risk. Risk factors may include introducing land uses or operational activities that are prone to contributing to wildfires or generating windblown embers, adding vehicle trips to the area that may increase vehicle-related ignitions or introducing new residents to a WUI or VHFHSZ.

The Modified Project does not introduce new land use or other operational modifications to the 2017 Project that would be expected to substantially increase fire ignitions, ember generation or fire spread compared to the 2017 Project. The Modified Project would not substantially increase development intensity and would not introduce more residents to the WUI compared to the 2017 Project. Nevertheless, to provide additional information, the following evaluates the Modified Project's potential to exacerbate wildfire risks by considering:

1. The effectiveness of the regulatory compliance, mitigation measures and PDFs applicable to the Modified Project at reducing on-site and off-site wildfire risks;
2. Whether the Modified Project would introduce new human activities, vehicles, embers, or powerlines that would substantially exacerbate wildfire risks; and
3. Based on wildfire modeling, whether the Modified Project's fuel modification zones and other protection measures would adequately protect against worst-case fire projections, both for resisting encroaching fires and inhibiting off-site spread of any fires started on-site.

(a) Effectiveness of the Modified Project's Wildfire Protective Measures

As with the 2017 Project, the Modified Project would comply with applicable regulations and Mitigation Measures RMDP/SCP-PH-7 and RMDP/SCP-PH-14. The Modified Project is subject to CFC and County Fire requirements, which impose some of the most stringent wildfire proactive measures in the state on new development. Broadly speaking, these regulatory requirements mandate that:

- New structures (residences, commercial buildings, public facilities, etc.) are fire-hardened to decrease flammability, reduce ignition potential, and inhibit fire spread based on state-of-the-art code standards that are frequently updated as part of ongoing code cycles; and
- Fuel modification zones (or FMZs) must be implemented and maintained around the development to buffer the development from encroaching fire and reduce the risk of off-site fire spread.

These protections are complementary. FMZs decrease the likelihood of fire impacting or spreading from a new community. Fire-hardened structures reduce the likelihood that fires will start or spread through new development, thereby reducing the risk of ember generation. Moreover, the Modified Project includes additional PDFs that would further reduce wildfire risks compared to the 2017 Project. The following describes these measures.

(i) Fire-Hardening of the Modified Project's Structures

State-of-the-art, ignition-resistant construction and building standards apply to the Modified Project's residential, non-residential, and public facility buildings, which must meet Chapter 7A of the CBC, Title 26 of the County of Los Angeles Building Code, and the County Fire requirements. These standards require, among many other measures described in the FPP, fire-resistant roofing to resist ignition from embers or building-to-building fires, vent covering and opening limitations to avoid ember intrusion, noncombustible or ignition-resistant exterior walls, ignition-resistant eaves, and porch ceilings, insulated windows and exterior doors, fire-resistant exterior decks and walkways, and ignition-resistant under-flooring and appendages. Generally speaking, the Modified Project's fire building construction measures are equivalent to or exceed the measures considered in the State-certified EIR because code compliance becomes more stringent over time.

The Modified Project's other fire protective measures include:

- Existing and planned firefighting capabilities to ensure a response to fire and medical emergencies (see further discussion below).
- In all structures, additional fire protection systems, including internal fire sprinkler systems.
- Fire-resistant landscaping requirements consistent with County Fire's landscaping limitations (to reduce fuel load and fire risk), as enforced by County Fire.
- Multiple access routes for fire apparatus and emergency vehicles.
- Multiple evacuation routes during a wildfire event.
- Water capacity, delivery, and availability.
- Ongoing resident fire safety education and evacuation planning.

(ii) Protective Buffers of Fuel Modification Zones around the Modified Project

An FMZ is a strip of land where combustible vegetation has been removed and/or modified and partially or totally replaced with more adequately spaced, drought-tolerant, low fuel volume plants in order to provide a reasonable level of protection to structures from wildland fire. As required by PRC Section 4291, the Modified Project would have FMZs of at least 100 feet, measured on a horizontal plane, from structures that face the site perimeter towards the undeveloped areas. The Modified Project's FMZs would at least

consist of: (i) a 30-foot-wide Zone A (irrigated), which begins at an exterior structure wall; and (ii) a 70-foot-wide Zone B extending from the edge of Zone A to 100 feet. The Modified Project will also include an ERZ, consistent with state law, within Zone A to further reduce fuel loads within 5 feet residences and commercial buildings.

The Modified Project's FMZs must be reviewed and approved by the Forestry Division of County Fire for consistency with defensible space and fire safety guidelines. **Figure 5.14-3**, Entrada South Planning Area Fuel Modification Map, and **Figure 5.14-4**, VCC Planning Area Fuel Modification Map, illustrate the FMZ for the Entrada South and VCC Planning Areas, respectively, consistent with CalFire and County Fire requirements. In addition, the Modified Project's PDFs provide additional fuel reduction benefits. Under PDF-WF-3 and PDF-WF-4, the FMZs must be funded, maintained, and inspected for the life of the Modified Project. PDF-WF-5 helps reduce the risk of human-caused ignitions in the area by educating residents about wildfire risks and safety. The Wildfire Education Program described in Section 7 of the FPP provides a Project-specific approach for raising wildfire awareness and preparedness for living in a fire-prone environment. Residents and occupants would be provided with tools such as how to maintain the ERZ, how to prepare for wildfire season, how to make a residential evacuation plan, and preventing human-caused ignitions.

These fire-hardening and FMZ wildfire protective measures have proven to substantially reduce the risk of buildings catching fire or spreading fires during a wildfire event, particularly when integrated into a master-planned community such as the Modified Project. As documented in the FPP, recently constructed master-planned communities with similar measures have been very resistant to wildfire risks, including withstanding extreme fire events without suffering substantial structural loss.[24]

(b) Human Activities and Ignition Sources

Next, the Modified Project's potential to exacerbate wildfire risks related to powerlines, vehicles, embers and introducing human activities and ignition sources in VHFHSZs is evaluated.

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[24] *For example, the Witch Creek fire was one of the most destructive fires in California's history and destroyed thousands of homes in San Diego County. However, after the 1990 Paint Fire in Santa Barbara and the 1991 Oakland Hills Tunnel Fire, the Rancho Santa Fe community in San Diego implemented updates fire codes, defensible space rules, home hardening measures, and vegetation restrictions; all of which were maintained and enforced by the HOA. As a result, when the Witch Creek fire spread to Rancho Santa Fe, in the five newer communities that had implemented such protective measures, no homes were lost, in strong contrast to many older communities that were heavily impacted. The FPP describes several additional communities that feature similar fire protection measures as the Modified Project, which have experienced minimal to no structural loss during wildfire events.*

(i) Human Activities

Human activities and introducing potential ignition sources in a very high fire severity zone related to project use have the potential to be ignition sources. Like the 2017 Project, however, the Modified Project would be built according to the strictest wildfire standards and would incorporate numerous design features that reduce the potential for operation and human activities to cause wildfire on-site and reduce the potential of off-site fire spread, as described above. The Modified Project would slightly change the ratio of residential to non-residential units, resulting in a net reduction of 3,187 square feet of total development in comparison to the State-certified EIR. The Modified Project would reduce the total number of residential units constructed within the Entrada South Planning Area by 151 units (i.e., 1,725 units reduces to 1,574 units and 3,235,100 square feet of residential to 2,951,913 square feet of residential). The Modified Project would also increase the non-residential square footage in the Entrada South Planning Area by 280,000 square feet (i.e., 450,000 square feet increased to 730,000 square feet). the refinements to the Modified Project's land uses would not be expected to materially change the types of human activities that could produce ignition sources compared to the 2017 Project.

While humans can drive wildfire ignition risk in the WUI, comprehensive actions can be taken to mitigate such risks to less than significant levels.[25] When fire protection is implemented at the parcel level and leverages ignition resistant building materials, infrastructure improvements, protective FMZs, and other measures, the wildfire risk can be reduced to less than significant levels not only within the proposed development but in the surrounding environment as well.[26]

On a regional scale, land use planning can minimize impacts associated with unplanned development in the WUI. In this case, the Modified Project is largely surrounded by development and is located in areas of the Area Plan that have long been designated for commercial and residential use. Based on the Modified Project's consistency with the Area Plan and through implementation of mitigation measures, regulatory compliance and additional PDFs, the Modified Project would not significantly exacerbate wildfire risks related to introducing human activity to the WUI or a very high fire severity zone.

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[25] *FPP, citing Elia et al., 2019.*

[26] *FPP, citing Newman et al., 2013.*

(ii) Electric Powerlines

In southern California, electric powerline-related fires have contributed to destructive fires. The Modified Project would not increase electric powerline impacts compared to the 2017 Project. For the Modified Project, as with the 2017 Project, Project-related electric distribution powerlines would be buried underground. The Modified Project would not impact SCE's existing transmission lines and towers in the vicinity of the site, including the existing transmission lines located along the Entrada South Planning Area southern boundary. The Modified Project would not significantly exacerbate fire risks related to powerlines.

(iii) Vehicles

The Modified Project would be consistent with regulatory requirements to reduce fire and ignition risks along roadways, as described in the FPP, as described in Appendix 5.14a.

(iv) Embers

The Modified Project does not include modifications that would increase airborne embers relative to the 2017 Project. On-site embers would most likely originate from a structure fire. The same fire-hardening and FMZ requirements that would protect structures and residents of the Modified Project would also reduce the likelihood of a structure fire occurring and embers migrating off the Modified Project Site. FMZs have been shown to lower ember cast and have a shadow effect on the untreated landscape by reducing the probability of burning and the potential fire size.[27] Because on-site fires are unlikely to occur and, even if so, would likely be low-intensity fires due to lack of fuel sources, the Modified Project would not significantly exacerbate the production of embers that could fly across the FMZ areas to surrounding areas.

(c) Fire Behavior Modeling

To further inform the evaluation of the Modified Project's potential to exacerbate wildfire risks, the FPP includes modeling of pre- and post-development conditions to document the type and intensity of fire that would be expected to occur adjacent to the Modified Project Site, given characteristic features such as topography, vegetation, and weather. The BehavePlus software package, Version 5.05, was used to evaluate fire behavior variables and to objectively predict flame lengths, intensities, and spread rates for three modeling scenarios.

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[27] *FPP, citing Cochrane et al., 2012.*

The results of the wildfire behavior modeling for three different fire scenarios near the Entrada South Planning Area under existing conditions are presented in **Table 5.14-2**, BehavePlus Modeling Results—Existing Conditions for Entrada South Planning Area, on page 5.14-66. The modeling provides worst-case wildfire behavior conditions as part of a conservative approach to considering fire risk, as described in the FPP.

The results of wildfire behavior modeling for three different fire scenarios near the VCC Planning Area under existing conditions are presented in **Table 5.14-3**, BehavePlus Modeling Results—Existing Conditions for the VCC Planning Area, on page 5.14-67.

The results of wildfire behavior modeling for three different fire scenarios near the Entrada South Planning Area under post-development conditions (including fuel modification zone recommendations for the Modified Project) is presented in **Table 5.14-4**, BehavePlus Modeling Results—Post-Project Conditions for the VCC Planning Area, on page 5.14-68.

The modeling results in **Table 5.14-3**, BehavePlus Modeling Results—Existing Conditions for the VCC Planning Area, demonstrate the effectiveness of the Entrada South Planning Area's FMZs. The BehavePlus modeling results estimate that in the Entrada South Planning Area, wildfire in non-treated (pre-Project) coastal scrub represents the most extreme conditions with expected flame lengths to reach up to approximately 46 feet with 52 mph gusts (offshore winds) and 15 feet with 14 mph wind speeds (onshore winds). Spread rates for coastal scrub fuel beds range from less than 1 mph (onshore winds) to 7.2 mph (offshore winds). Spotting distances, where airborne embers can ignite new fires downwind of the initial fire, would range from 0.5 to 2.5 miles. The built out conditions of the Entrada South Planning Area, including the implementation of the FMZs and other proposed wildfire protection measures, would reduce the fire behavior to less than 10.6 feet tall at the outer edges of the FMZ and less than 3 feet in Zone A (irrigated), which is the portion of the FMZ nearest the Modified Project's structures.

Within the VCC Planning Area, maximum flame lengths were anticipated to occur in untreated (pre-Project) surface fuels, including grasslands and coastal scrub, and were estimated to reach up to 39.7 to 45.7 feet in height, respectively, with spread rates between 7.1 and 17.7 mph under extreme weather conditions, represented by Santa Ana winds blowing at gusts of 52 mph. Post-development conditions within the VCC Planning Area, inclusive of the FMZs, would reduce the 46-foot-tall flames predicted during pre-Project conditions under extreme weather conditions to 10.6 feet tall at the outer edges of Zone B and no more than 3 feet by the time the inner portions (i.e., irrigated Zone A) of the fuel modification zone are reached.

Table 5.14-2
BehavePlus Modeling Results—Existing Conditions for Entrada South Planning Area

Fire Scenarios	Flame Length (feet)	Fireline Intensity (Btu/feet/ second)	Spread Rate (mph)	Spotting Distance[a] (miles)
Scenario 1: Southeast-facing, 25 percent slope; Offshore 52 mph gusts (97th percentile)				
Valley oak/grass (Gr4)	39.9	17,131	17.9	2.3
Coastal scrub (Sh5)	46.0	23,393	7.2	2.5
Scenario 2: South-facing, 20 percent slope; Offshore 52 mph gusts (97th percentile)				
Coastal scrub (Sh5)	45.7	23,045	7.1	2.5
Scenario 3: North-facing, 27 percent slope; Onshore 14 mph winds (50th percentile)				
Coastal scrub (Sh5)	15.0	2,059	0.83	0.5

Btu = British thermal units
mph = miles per hour
[a] *Spotting distance from a wind-driven surface fire.*
Source: Dudek, 2022.

Accordingly, the BehavePlus modeling demonstrates that approaching fires would be rebuffed or substantially reduced in size and intensity before reaching the inner portions of the FMZs and the structures of the Modified Project. Based on the predicted flame lengths and intensities following implementation of the FMZs, encroaching wildfires would not present a significant risk of directly intruding into the Modified Project even during extreme events (e.g., strong Santa Ana winds). Even if windblown embers were to fly over the FMZs, the ignition-resistant buildings and fire-resistant landscaping would minimize the likelihood of any fires starting on-site, and even if isolated fires occurred, they would be unlikely to spread quickly or be of high intensity given the limited fuel sources. Thus, the Modified Project, once developed, would not facilitate wildfire spread and would reduce estimated flame lengths of approaching wildfires to levels that would be manageable by existing firefighting resources.

Similarly, if a fire were to start on the Modified Project Site, the fire would likely remain manageable and be addressed by the identified fire-fighting resources due to the ignition-resistant landscapes and structures, along with the perimeter FMZs which are designed to both protect the Modified Project and minimize the likelihood that an on-site fire could escape into wildland areas. As such, the Modified Project's FMZs, fire-hardened structures, and ignition-resistant landscaping would provide protection to both on-site structures and off-site areas.

Table 5.14-3
BehavePlus Modeling Results—Existing Conditions for the VCC Planning Area

Fire Scenarios	Flame Length (feet)	Fireline Intensity (Btu/feet/ second)	Spread Rate (mph)	Spotting Distance[a] (miles)
Scenario 1: Flat, <5 percent slope; Offshore 52 mph sustained gusts (97th percentile)				
Grass (Gr4)	39.7	16,929	17.7	2.3
Coastal scrub (Sh5)	45.7	23,043	7.1	2.5
Southern cottonwood–willow riparian[b,c] (Sh4)	24.5	5,938	4.5	1.6
Scenario 2: South-facing, 10 percent slope; Onshore 14 mph sustained winds (50th percentile)				
Grass (Gr4)	39.7	16,929	17.7	2.3
Coastal scrub (Sh5)	45.7	23,043	7.1	2.5
Southern cottonwood–willow riparian[b,c] (Sh4)	24.5	5,938	4.5	1.6
Scenario 3: North-facing, 40 percent slope; Offshore 52 mph sustained gusts (97th percentile)				
Coastal scrub (Sh5)	46.3	23,684	7.3	2.6

Btu = British thermal units

mph = miles per hour

VCC = Valencia Commerce Center

[a] *Wind-driven surface fire.*

[b] *Riparian overstory torching increases fire intensity. Modeling included canopy fuel over Sh4, which represents surface fuels beneath the tree canopies.*

[c] *A surface fire in the mixed willow riparian forest would transition into the tree canopies generating flame lengths higher than the average tree height (35 feet). Viable airborne embers could be carried downwind for approximately 1 mile and ignite receptive fuels.*

[d] *Crowning = fire is spreading through the overstory crowns.*

Source: Dudek, 2022.

(d) Pollutants from Fires

Wildfires have the potential to increase emissions of pollutants, including particulate matter pollutants. If a project does not significantly exacerbate the risk of wildfire, the project would not expose project occupants to increased pollutant concentrations from wildfires. In this case, the Modified Project would not exacerbate wildfire risks compared to the 2017 Project. The Modified Project will also include PDFs that further reduce wildfire risks compared to the 2017 Project. Therefore, the Modified Project would not expose project occupants to increased pollutant concentrations from wildfires.

Table 5.14-4
BehavePlus Modeling Results—Post-Project Conditions for the VCC Planning Area

Fire Scenarios	Flame Length (feet)	Fireline Intensity (Btu/feet/ second)	Spread Rate (mph)	Spotting Distance (miles)
Scenario 1: Fuel treatments, manufactured slopes, offshore 52 mph gusts (97th percentile)				
Fuel modification zone A(FM8)	3.0	63	0.2	0.4
Fuel modification zone B (Sh1)	10.6	959	1.5	0.9
Scenario 2: Fuel treatments, manufactured slopes, onshore 14 mph winds (50th percentile)				
Fuel modification zone A(FM8)	1.5	14	0.05	0.1
Fuel modification zone B (Sh1)	2.3	33	0.3	0.1
Scenario 3: Fuel treatments, manufactured slopes, offshore 52 mph gusts (97th percentile)				
Fuel modification zone A(FM8)	3.0	63	0.2	0.4
Fuel modification zone B (Sh1)	10.6	959	1.5	0.9

Btu = British thermal units
mph = miles per hour
VCC = Valencia Commerce Center
Source: Dudek, 2022.

(e) Conclusion

In summary, the State-certified EIR determined that on-site and off-site wildfire impacts from the 2017 Project would be significant though this impact would be reduced to less than significant with mitigation. The Modified Project does not include modifications that would increase such fire risk. As with the 2017 Project, the Modified Project is master-planned community with integrated fire protection measures to fire-harden structures and protect the community with FMZ, strategies that have proven highly effective at mitigating wildfire impacts in other master-planned communities. The Modified would not exacerbate risks related to introducing residents to the WUI, vehicles, powerlines, or embers. Modeling demonstrates that encroaching wildfires would not present a significant risk of directly intruding into the Modified Project even during extreme events (e.g., strong Santa Ana winds). Even if windblown embers were to fly over the FMZs, the ignition-resistant buildings and fire-resistant landscaping would minimize the likelihood of any fires starting on-site, and even if isolated fires occurred, they would be unlikely to spread quickly or be of high intensity given the limited fuel sources. The Modified Project incorporates PDFs that would further reduce wildfire risks compared to the 2017 Project. Therefore, Modified Project would not exacerbate wildfire risks compared to the 2017 Project that could have

the potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The Modified Project would not result in any new or substantially more severe significant impacts during operations related to Threshold 5.14-2 as compared State-certified EIR for the 2017 Project.

Threshold 5.14-3: Would the Modified 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?

The Modified Project's installation and maintenance of infrastructure would be substantially similar to the 2017 Project. As with the 2017 Project, the Modified Project would involve the extension of existing roadways and the installation of an interior circulation network. As with the 2017 Project, utility service lines, including those for water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services, would be extended from their current locations to the Modified Project structures.

As with the 2017 Project, the Modified Project's roads would comply with all regulatory requirements regarding roadside vegetation clearance and vertical clearance to the sky per County Code Title 32 Section 325.10. Further, any landscaping would adhere to the preferred plan list and avoid prohibited species per the FPP (see Appendix D and E therein). Adherence to these regulatory requirements would reduce the risk of fire ignition along roadways.

The Modified Project would not substantially increase the need to relocate or construct utilities as compared to the 2017 Project. The Modified Project would adhere to all regulatory requirements applicable during both the initial implementation and maintenance of any infrastructure. For the Modified Project, as with the 2017 Project, Project-related electric distribution powerlines would be buried underground.

Because the Modified Project's installation and maintenance of infrastructure would be substantially similar to the 2017 Project, the Modified Project would not exacerbate fire risks compared to the 2017 Project. The Modified Project would not result in new or substantially more severe significant impacts related to this Threshold 5.14-3 as compared State-certified EIR for the 2017 Project.

Threshold 5.14-4: Would the Modified 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?

As with the 2017 Project, the Modified Project is located in a VHFHSZ and the surrounding areas are topographically diverse, with slope gradients ranging from moderate to steep. The Entrada South Planning Area is located south of the Santa Clara River on rugged terrain dominated by several steep north–south-trending slopes, with elevations ranging from approximately 1,000 feet amsl to approximately 1,438 feet amsl. The Entrada South Planning Area contains portions of four drainage channels: Magic Mountain Canyon and three unnamed drainages (Unnamed Canyon 1, Unnamed Canyon 2, and Unnamed Canyon 3). All four tributaries exit the Entrada South Planning Area through natural drainages before eventually discharging into the Santa Clara River.

The VCC Planning Area is located north of the Santa Clara River in relatively flat areas along Castaic Creek and within the lower elevations of Hasley Canyon, with site elevations ranging from approximately 945 feet amsl to approximately 1,470 feet amsl. The VCC Planning Area is dissected by two south–north-trending tributaries to the Santa Clara River: Castaic Creek and Hasley Creek. Both tributaries exit the VCC Planning Area through natural drainages before eventually discharging into the Santa Clara River.

Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present, and such conditions have the potential be exacerbated in a post-fire environment where the vegetative cover has been removed. Vegetation plays a vital role in maintaining existing drainage patterns and the stability of soils. Plant roots stabilize the soil, and leaves, stems, and branches intercept and slow water, allowing it to more effectively percolate into the soil. Removal of surface vegetation reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris and mudflows. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased since water percolation into the soil is reduced. The potential for surface runoff and debris flows, therefore, increases for areas recently burned by large wildfires.

The 2017 Rye Fire (6,048 acres) ~~is the most recent fire to have~~ burned in the Modified Project area. Based on field surveys conducted by Dudek in 2019, because the vegetation communities in the Modified Project area are composed of native species that have adapted to periodic fires and thus can rapidly regenerate after a fire, vegetation has regenerated since the 2017 Rye Fire, thereby aiding in stabilizing surrounding slopes.

<u>As described in the FPP, the 2025 Hughes Fire near Castaic, located approximately 2 to 4 miles north of the VCC Planning Area, burned approximately 10,425 acres and was an active fire for eight days between January 22 to January 30, 2025. The fire ignited east of Castaic Lake near Lake Hughes Road and temporarily caused the closure of all lanes of the I-5 through the Grapevine on Wednesday, January 22. The Hughes Fire caused evacuation orders and warnings to be issued in nearby communities to the Hughes Fire.</u>

Section 4.13, Geology and Soils, of the State-certified EIR analyzed impacts related to geology and soils resulting from development of the 2017 Project within Entrada South and VCC Planning Areas. Impacts were evaluated relative to debris flow hazards, ground rupture, seismic shaking, slope stability (including landslides), bedding planes, shear strength, erosion potential, and liquefaction potential, as summarized below.

- Entrada South Planning Area: The State-certified EIR found impacts related to the following issues to be less than significant with mitigation: expansive and poorly consolidated soils; ground rupture or displacement, ground failure (liquefaction, landslides, etc.), and ground shaking; liquefaction and earthquake induced settlement; and soil erosion or loss of topsoil.[28]

- VCC Planning Area: Similar to Entrada South, impacts related to expansive and poorly consolidated soils as well as ground rupture, ground failure, and ground shaking were determined to be less than significant with mitigation, as were impacts related to and soil erosion or loss of topsoil.[29]

An analysis of the Modified Project's impacts related to geology and soils was prepared by ENGEO Incorporated, provided in Appendix IS-3 of the Modified Project's Initial Study. ES/VCC-GEO-3 requires that a Corrective Grading Plan delineating landslide areas be prepared and submitted to the County of Los Angeles Department of Public Works. ES/VCC-GEO-3 requires mitigation of all areas subject to liquefaction and that landslides either be removed, stabilized, or buildings setback accordingly. ES/VCC-GEO-3 also requires that grading and engineering design requirements address the removal of unstable soil, stabilization of potential landslides area, and compaction of engineered fill to meet County requirements.

As detailed in the Initial Study, the Modified Project would not increase impacts related to soil erosion or loss of topsoil as compared to the 2017 Project. The State-certified EIR concluded that the effects of substantial soil erosion or loss of topsoil may include the undermining of structures and slopes, alterations of surface drainage patters, steepening of slopes, and loss of setback areas and safety zones would be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Project that would increase risks related to soil erosion or the loss of topsoil. Further, the Modified Project requires Mitigation Measure ES/VCC-GEO-3 to address soil erosion risks. Corrective grading would remove unstable soils, stabilize potential landslide areas, and compact engineered fill to meet County grading and soil compaction requirements and reduce impacts to a less than significant level.

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[28] *State-certified EIR, pp. 4.13-41 to 4.13-42.*

[29] *State-certified EIR, pp. 4.13-40 to 4.13-41.*

As described in response to Threshold 5.13-2, the multi-layer fire protection approach of the Modified Project would substantially reduce the wildfire risk and the likelihood of fire for the Modified Project and the area. As a result, if a wildfire were to occur, it would not result in extreme fire severity and post-fire slope instability due to the lack of available fuels and fire protection measures. Further, development areas within the Entrada South and VCC Planning Areas would be stabilized during construction through the use of drainage improvements and bank stabilization. The Modified Project falls within the disturbance footprint analyzed for the 2017 Project and would be consistent with the general scope and intensity of development that was studied in the State-certified EIR for the 2017 Project. Therefore, with adherence to regulatory requirements and applicable mitigation measures, the Modified Project would not result in any new or substantially more severe significant impacts related to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes compared to the as compared State-certified EIR for the 2017 Project.

Threshold 5.14-5: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?

The Modified Project would not involve the construction of new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. The Modified Project involves substantially similar land uses as the 2017 Project and is consistent with the Area Plan.

County Fire 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 County Fire's service territory based on distance and availability, without regard to jurisdictional or municipal boundaries. The Modified Project would be required to satisfy the County's Fire Facility Fee, which funds the purchase of station sites, the construction of new stations and facility improvements, and the funding of capital equipment to mitigate new development's fair share contribution to the need for wildfire protection services, thereby addressing any increase in demand for County Fire's protective services.

The Modified Project would be substantially similar to the 2017 Project with respect to demand for fire protection services. The slight changes in land uses for the Modified Project compared to the 2017 Project would not substantially change the response times by County Fire. Nevertheless, to provide additional information about response times, the

FPP modeled total estimated response times based on the full buildout of the Modified Project.

As detailed in the FPP, the Modified Project Site is located within the County Fire jurisdictional response area, within the North Operations Bureau, Division 3. The closest County Fire stations to the Modified Project Site are Stations 76, 124, 126, 143, and 156, along with planned Station 46 (approved and planned for construction).[30] It is common for multiple engines to respond to emergency calls based on availability and proximity. As described in the FPP, existing stations would be capable of responding to the Entrada South and VCC Planning Areas consistent with the County's response time targets for suburban areas.

As described in the ~~One Valley One Vision Program~~ Area Plan EIR, County Fire's response time standards by land-use type are as follows:[31]

- 5 minutes or less for urban areas
- 8 minutes or less for suburban areas
- 12 minutes or less for rural areas

The Modified Project is located in a suburban area. As detailed in the FPP, fire response services from existing stations can be provided to the Modified Project site consistent with the County Fire standards for suburban areas:

- **VCC Planning Area**—Based on the response time modeling provided in the FPP, existing Fire Stations 76 and 143 are closest to the VCC Planning Area and could reach the site boundary in under 5 minutes. For Fire Station 76, total response time to the most remote developed portion of the VCC Planning Area is modeled to take 5.5 minutes, which conforms with County Fire's time 8-minute-or-less response target for suburban areas. In addition, for Fire Station 143, total response time to the most remote developed portion of the VCC Planning Area is modeled to take 7.2 minutes, which conforms with County Fire's time 8-minute-or-less response target for suburban areas.

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[30] *Newhall is required to construct Fire Station 46 (formerly referred to as Station 177) pursuant to Mission Village Mitigation Measure 4.12-2. Fire Station 46 is expected to be operational prior to the Modified Project contributing to the demand for fire services; however, to be conservative, this analysis assumes Station 46 will not be operational by the time Entrada South becomes occupied.*

[31] *~~Bagwell, pers. comm. 2020b (see FPP); see also OVOV, One Valley One Vision~~ Area Plan Draft Program EIR, p. 3.15-2 to 3.15-3.*

- **Entrada South Planning Area**—Existing Fire Station 126 is closest to Entrada South~~ and could reach the site boundary in under 5 minutes~~. ~~For~~ Based on the response time modeling provided in the FPP, for Station 126, total response time to the most remote developed portion of the Entrada South Planning Area is modeled at 6 minutes, 41 seconds using posted speed limits and at 7 minutes 47 seconds using an average speed of 35 mph, which conforms with County Fire's time 8-minute-or-less response target for suburban areas. ~~Moreover,~~ Based on the response time modeling provided in the FPP, for Station 76, total response to ~~the most remote~~ developed portion of the Entrada South Planning Area is modeled at under 8 minutes using the posted speed limits methodology, which conforms with County Fire's time 8-minute-or-less response target for suburban areas, and in under 8 minutes to 95% of the Entrada South Planning Area (all but southwest corner) using an average speed of 35 mph methodology~~, which substantially conforms with County Fire's time 8-minute response target for suburban areas~~. As described in the FPP, Fire Station 46 will provide faster response times once operational because of its close proximity to the Entrada South Planning Area.

Thus, existing stations are capable of responding to the Entrada South and VCC Planning Areas consistent with County Fire's response time targets for suburban areas. Further, planned Station 46 will be located in Mission Village and will provide additional fire services once it becomes operational, although this analysis does not assume Station 46's availability as a conservative measure. Accordingly, the Modified Project would not result in new or substantially more severe significant impacts compared to the as compared the State-certified EIR for the 2017 Project related to the provision of new or physically altered governmental facilities or result in the need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Threshold 5.14-6(i): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within a high fire hazard area with inadequate access?

Impacts related to access were analyzed in the State-certified EIR for the 2017 Project and determined to be significant prior to mitigation. Mitigation Measure PH-7 would reduce this impact to a less than significant level. The Initial Study concluded that the Modified Project would implement Mitigation Measure RMDP/SCP-PH-7 and the circulation system would be designed and constructed in accordance with all applicable County Fire requirements. The Modified Project would also implement PDF-HM-1, which though beneficial and not required to reach a less than significant conclusion, would require the submission of a detailed Construction Traffic Management Plan that include provisions for adequate emergency access to all residences and businesses during construction

activities. The Initial Study concluded that the Modified Project would not result in new significant impacts related to impairing implementation of an adopted evacuation plan.[32]

For this analysis, Stantec, the transportation consultant for the Modified Project, evaluated the Modified Project's consistency the Area Plan, which took into account emergency access and evacuation during wildfires and other emergencies. The Area Plan EIR analyzed the impact of wildland fires on emergency access and evacuation given the planned buildout of the Santa Clarita Valley.[33] The Area Plan EIR concluded that the Area Plan policies would ensure that buildout would be consistent with County evacuation plans and procedures, ensuring safe egress and evacuation during emergencies, including emergencies caused by fires or wildfires.[34] Stantec determined the Modified Project is consistent with the Area Plan and the Area Plan's planned circulation and transportation system.[35]

Further, the FPP considered whether the Modified Project would expose people, either directly or indirectly, to a significant risk of loss, injury, or death involving fire or wildland fire related to access. As with the 2017 Project, the Modified Project Site would be regionally accessible from I-5 and SR-126. As with the 2017 Project, a new network of roads would be implemented that would connect the Modified Project Site to the existing road system. The Modified Project does not include a substantial change to its access plan and road network and does not increase vehicle trips compared to the 2017 Project. As with the 2017 Project, the Modified Project Site access, including road widths and connectivity, would be consistent with the County's roadway standards (Title 21), County Fire secondary access requirements, and the California Fire Code (Section 503). Further, in accordance with PDF-WF-2, access roads would be completed and paved prior to the issuance of building permits and prior to beginning any potentially combustible construction activities.

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[32] *Initial Study, Entrada South and Valencia Commerce Center Project, October 7, 2021, p. 73.*

[33] *Area Plan Draft EIR, Chapter 3.11, Hazards and Hazardous Materials, pp. 3.11-28 to 3.11-29.*

[34] *Area Plan Draft EIR, Chapter 3.11, Hazards and Hazardous Materials, pp. 3.11-30.*

[35] *Stantec, Los Angeles County and the Santa Clarita Area Plan (One Valley One Vision) Circulation, Emergency Access, and Evacuation Framework, April 2022. Refer to* ***Appendix 5.14d*** *of this SEIR. See also the Evacuation Plan, in* ***Appendix 5.14b****, which describes existing condition includes alternatives to reliance on I-5 as part of the baseline, including in extreme snowfall scenarios, referred to by Caltrans as "Operation Snowflake." When forecasters predict heavy snow will drop to 4,500 feet or lower, Caltrans coordinates with the California Highway Patrol to activate "Operation Snowflake," an alert system that calls for maintenance crews to work around-the-clock to keep the highway open. ("Caltrans News Flash #218—Keeping motorist safe in the Southland with Operation Snowflake," https://dot.ca.gov/news-releases/news-release-2020-002.) California Highway Patrol officials determine if it's necessary to shut down the highway as a safety precaution. If a closure is ordered, Caltrans blocks off the northbound I-5 lanes at Lake Hughes Road at Castaic and the southbound I-5 lanes at Grapevine Road in Kern County.*

As described in the FPP, the Modified Project Site's primary routes would be accessed through internal circulation roadways that would connect with the primary ingress/egress roads that intersect off-site primary and major transportation routes, including I-5 and SR-126. There would be multiple primary access routes for the Modified Project:

Entrada South Planning Area Primary Ingress/Egress Routes:

- Eastern Primary Route: Magic Mountain Parkway, or The Old Road or I-5 to the north or south.
- Southern Primary Route: Westridge Parkway to Valencia Boulevard then east to The Old Road or I-5.

VCC Planning Area Primary Ingress/Egress Routes:

- Southern Primary Route: Commerce Center Drive to SR-126 to the east or west.
- Northern Primary Route: Commerce Center Drive to Hasley Canyon Road to The Old Road or I-5 to the north or south.
- Western Primary Route: Franklin Parkway to Wolcott Way to SR-126 to the east or west.
- Eastern Secondary Routes: Hancock Parkway to Turnberry Lane or Muirfield Lane to The Old Road to the north or south.

In addition to the FPP, although the Modified Project will not result in an impact to emergency access, PDF-WF-6 provides additional benefits through the preparation of a Wildfire Evacuation Plan, which is attached as **Appendix 5.14b**. The Wildfire Evacuation Plan was prepared based on the Los Angeles County Office of Emergency's (EOC) Operations Area (OA) Emergency Response Plan.

The Wildfire Evacuation Plan analyzed and described potential evacuation scenarios and the Modified Project's access and potential to impact regional evacuation times. The roles of various agencies participating in a wildfire evacuation, including County Fire, the County Sherriff Department, and the Office of Emergency Management. Every evacuation scenario will include some level of unique challenges, constraints and fluid conditions that require interpretation, fast decision making, and alternatives.

The Wildfire Evacuation Plan describes evacuation procedures, best practices for homeowners under the County Fire's "Ready, Set, Go!" program. The focus of the "Ready, Set, Go!" program is on public awareness and preparedness, especially for those living in

the WUI. The program is designed to incorporate the local fire protection agency as part of the training and education process in order to ensure that evacuation preparedness information is disseminated to those subject to the potential impact from a wildfire.

Wildfire evacuations typically allow time for responders to conduct evacuation notifications in advance of an immediate threat to life safety, which gives residents time to gather belongings and make arrangements for evacuation. Wildfire evacuations are managed to move smaller populations in a successive phasing to minimize traffic surges. Populated areas are evacuated in phases based on proximity to the event and risk levels. Typically, evacuation will take place in a measured manner that can be accommodated by the multiple access routes without any additional material strain on the regional circulation system. Because the Modified Project is largely surrounded by existing development and is consistent with the Area Plan, the Wildfire Evacuation Plan anticipated that there would be adequate opportunity to sequence any evacuation in an orderly, sequenced manner.

Because the Modified Project is largely surrounded by newer, existing development and infrastructure that will act as a fire break, it is most likely that residents would either not need to evacuate during a wildfire event or would be given ample time and notice to prepare and evacuate in a timely manner dispersed over several days. Even under more extreme, unpredictable conditions, the County has demonstrated an ability to evacuate large numbers during mega-fire events.

Nevertheless, while the potential occurrence of a large, mass evacuation event is minimal, for informational purposes, the Wildfire Evacuation Plan analyzed conservative mass evacuation scenarios.[36] The evacuation timing analysis assumed a number of conservative factors, including that every project resident would be at home and would evacuate two vehicles, a scenario that is theoretically possible but very unlikely. As detailed in the Wildfire Evacuation Plan, even under these conservative evacuation scenarios, the Modified Project would slightly decrease evacuation travel times compared to the 2017 Project along the most congested evacuation routes in the Entrada South Planning Area and would not change evacuation travel times in the VCC Planning Area; therefore, the Modified Project does not present a significant change to evacuation time as compared to the 2017 Project even under a conservative mass evacuation scenario.

The State-certified EIR determined that impacts related to access during an emergency would be less than significant with mitigation. The Modified Project does not include modifications that would increase access or evacuation risks. The Modified Project

[36] *Refer to the Wildfire Evacuation Plan included as Appendix 5.14b, which describes existing conditions related to evacuation planning scenarios, including related to school evacuations.*

is consistent with the circulation and traffic system of the Area Plan, which took into account access and evacuation during wildfires. The Wildfire Evacuation Plan demonstrates that the Modified Project would not increase evacuation times even under a conservative mass evacuation scenario compared to the 2017 Project. Accordingly, the Modified Project would not result in any new or substantially more severe significant impacts as compared State-certified EIR for the 2017 Project related to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving fires or wildfires due to inadequate access.

Threshold 5.14-6(ii): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within an area with inadequate water and pressure to meet fire flow standards?

The State-certified EIR determined that the fire flow and water supply for the 2017 Project was sufficient. As described in Section 5.11, Utilities and Service Systems- Water Supply and Service, the Modified Project would result in a reduction in estimated water demand compared to the 2017 Project. The Modified Project's water demand is consistent with the 2020 Urban Water Management Plan's demand and supply calculations. Furthermore, SCV Water prepared a water supply assessment that concludes SCV Water will have sufficient supplies during average/normal, single dry, and multiple dry years within a 20-year projection to meet the projected demand associated with the Modified Project.

The Modified Project does not include a substantial change to the water requirements that would result in an increased fire risk as compared to the 2017 Project. ~~As with the 2017 Project, the Modified Project would be required to comply with County Code Title 20, Section 20.16.060 for fire flow and fire hydrant requirements within a VHFHSZ and with County Code Title 32, Section 507 for general fire flow and hydrant requirements, as described in the FPP.~~

Regarding fire flows, as described in Section 3.6.1 of the FPP, the Modified Project will comply with adopted standards governing fire flow requirements in County Code Title 20, Section 20.16.060 (Minimum Fire Flow and Fire Hydrant Requirements), and County Code Title 32, Section 507 (Fire Protection Water Supplies), pertaining to fire flow and fire hydrant requirements for areas located within a VHFHSZ, including the Modified Project. County Fire has imposed specific minimum flow conditions of approval for both the Entrada South Planning Area and VCC Planning Area based on County Code requirements.[36A] Within the internal roadways of the Modified Project, 12-inch water supply lines will be

[36A] *See County Fire, Fire Prevention Division, VTTM Project No. 87150, Condition No 13, 02/13/2025; County Fire, Fire Prevention Division, VTTM Project No. TR53295, Condition Nos. 25 and 26, 02/13/2025.*

installed to supply sufficient fire flows and pressure to meet the demands for required onsite fire hydrants and interior fire sprinkler systems for all structures. County Fire will determine that the Modified Project has met the adopted water flow requirements prior to allowing the issuance of building permits for the Modified Project.

As with the 2017 Project, within the internal roadways of each Planning Area, additional water supply lines would provide the main water supply to commercial and domestic service to each structure and common landscape areas. These internal waterlines would also supply sufficient fire flows and pressure to meet the demands for required on-site fire hydrants and interior fire sprinkler systems for all structures. In addition, County Fire helicopters can obtain water for dropping on wildland fires from Castaic Lake or from numerous ponds that are located throughout the golf course immediately south of the Entrada South Planning Area.

As with the 2017 Project, the Modified Project would include fire hydrants located along fire access roadways. The location of hydrants would be determined by County Fire and be based on current fire code requirements to meet operational needs. As with the 2017 Project, all Modified Project fire hydrants would be consistent with applicable County Design Standards and County Fire Code.

With adherence to the County Code, as with the 2017 Project, the Modified Project would meet all water and water pressure requirements to meet fire flow standards. The Modified Project would not result in new or substantially more severe impacts related to water supply or pressure compared to the as compared State-certified EIR for the 2017 Project. Therefore, the Modified Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving fires due to inadequate water and pressure to meet fire flow standards.

Threshold 5.14-6(iii): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within proximity to land uses that have the potential for dangerous fire hazard?

The Modified Project would slightly change the ratio of residential to non-residential units, resulting in a net reduction of 3,187 square feet of total development in comparison to the State-certified EIR The Modified Project's land uses are substantially similar to the 2017 Project and are consistent with the commercial and residential development long planned for the site under the Area Plan. As demonstrated in the fire behavior modeling results discussed above (in response to Threshold 5.14-2), wildfires may occur in wildland areas that surround the Modified Project Site, but would not be significantly increased in frequency, duration, or size due to the development of the Modified Project.

As noted above, the County's Safety Element, Policy S 4.1, would prohibit new subdivisions in VHFHSZs unless: (1) the new subdivision is generally surrounded by existing or entitled development or is located in an existing approved specific plan or is within the boundaries of a communities facility district adopted by the County prior to January 1, 2022, including any improvement areas and future annexation areas identified in the County resolution approving such district; (2) the County determines there is sufficient secondary egress; and (3) the County determines the adjoining major highways and street networks are sufficient for evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. The Modified Project is consistent with Safety Element Policy S 4.1 because the Modified Project is located within Los Angeles County Community Facilities District #3 (Valencia/Newhall Area), consistent with the first factor. As described above, the Modified Project Site's multiple ingress/egress roads that intersect off site primary and major transportation routes, including I-5 and SR-126, is consistent with the second factor. Finally, with respect to the third factor, the State-certified EIR determined that the 2017 Project would have a less than significant impact on adopted emergency response plans and emergency evacuation plans based and the analysis herein and the Evacuation Plan demonstrates that the Modified Project would not cause a new significant impact related to evacuation or emergency response.

On-Site Wildfire Impacts

The Modified Project would result in the conversion of fuels to maintained development and landscaping, with designated County Fire review of all landscaping, fuel modification areas, and ignition-resistant structures. As such, the Modified Project Site would be largely converted from readily ignitable fuels to ignition-resistant landscaping and structures that, consistent with state and County standards, provide defensible space, access for firefighters and early evacuations, water, and fire flow, and other fire protection features, as detailed in the prior impact discussions. Additionally, the Modified Project would implement PDF-WF-1 through PDF-WF-6, as discussed in Threshold 5.13.2, would provide additional wildfire safety benefits associated the Modified Project, further reducing the Modified Project's potential impacts related to wildfire compared to the 2017 Project.

Off-Site Wildfire Impacts

As discussed above, the State-certified EIR also analyzed the potential for development of the Entrada South and VCC Planning Areas to cause off-site impacts related to both emergency response and emergency evacuation plans and related to wildland fires. The State-certified EIR determined that the 2017 Project would not result in

significant off-site impacts related to these topics.[37] Further, as described above and in more detail in the FPP, attached as **Appendix 5.14a**, the Modified Project would not increase off-site ignition risk compared to the 2017 Project, and the Modified Project's PDFs would result in a further reduction of off-site ignition risks compared to the 2017 Project:

- During construction, PDF-WF-1 and PDF-WF-2 would reduce the risk of a fire that began on the Modified Project Site during construction from migrating off-site. Under PDF-WF-2, fuel modification zones must be in place prior to bringing combustible materials on site, which fuel modification zones would limit the risk of embers traveling to off-site fuel loads. Under PDF-WF-1, the Construction Fire Prevention Plan implements fire safety measures to reduce the possibility of fires during construction activities, including fire watches during hot work and heavy machinery activities (e.g., welding), spark arresters on all equipment, water supply via hose lines attached to hydrants, or a water tender pursuant to County Fire requirements, red flag period restrictions, and mandatory on site fire resources.

- During operations, the Modified Project does not include modifications that would increase airborne embers relative to the 2017 Project. The same fire-hardening and fuel modification zones requirements that would protect structures and residents of the Modified Project would also reduce the likelihood of a structure fire occurring and embers migrating off the Modified Project Site. Fuel modification zones have been shown to lower ember cast and have a shadow effect on the untreated landscape by reducing the probability of burning and the potential fire size. Because on site fires are unlikely to occur and, even if so, would likely be low-intensity fires due to lack of fuel sources, the Modified Project would not significantly exacerbate the production of embers that could fly across the fuel modification zones to surrounding areas. The BehavePlus modeling discussed above demonstrates that even if isolated on-site fires occurred, they would be unlikely to spread quickly or be of high intensity given the limited fuel sources to spread outward across the fuel modification zones. Thus, a fire would likely remain manageable and be addressed by the identified fire-fighting resources due to the ignition-resistant landscapes and structures, along with the perimeter fuel modification zones which are designed to both protect the Modified Project and minimize the likelihood that an on-site fire could escape into wildland areas. In addition, the PDFs described above would further reduce wildfire risks related to off-site ember cast and off-site impacts compared to the 2017 Project. As such, the Modified Project's fuel modification zones, fire-hardened structures, and ignition-resistant landscaping would provide protection to both on site structures and off site areas.

[37] *Final State-certified EIR, p. 4.17-62.*

The Modified Project would not result in new or substantially more severe significant wildfire impacts under any of thresholds above compared to the State-certified EIR for the 2017 Project. See discussion in Threshold 5.14-2 for additional information. The Modified Project would not result in new or substantially more severe significant impacts related to Threshold 5.14-6(iii) or 5.14-7.

7. CUMULATIVE IMPACTS

While the State-certified EIR found mitigation would reduce the 2017 Project's significant impacts related to wildfire to a less than significant level, it determined that the impacts related to wildland interface fires were cumulatively significant. This was based on the fire history in the region, and the potential for loss of structures, air quality, and traffic impacts to the residents of the 2017 Project and cumulative projects. However, the State-certified EIR also determined that other projects should implement mitigation measures similar to SP-4.18-2 (fire flow capacities), SP-4.18-3 (comply with all applicable building and fire codes and hazard reduction programs), SP-4.18-4 (developer fees or fire station construction), RMDP/SCP-PH-7 (secondary evacuation access) and RMDP/SCP-PH-14 (fuel modification), then the cumulative impact would be mitigatable to less than significant levels. Since the analysis performed in the State-certified EIR, new development in the area would be required to meet or exceed these mitigation measures through regulatory compliance with California Fire Code, County Fire Code Title 32, and County Fire requirements, which are more stringent than the standards analyzed in the State-certified EIR.

The cumulative context considered for Modified Project wildfire impacts is Los Angeles County, and more specifically, the Santa Clara River Valley. As discussed in Subsection 2, CalFire has mapped areas of fire hazards in the State based on fuels, terrain, weather, and other relevant factors. As described above, the Modified Project Site is located in a VHFHSZ. The Modified Project, combined with other projects in the region, would increase the population and/or activities and potential ignition sources in the Santa Clara River Valley, which may increase the potential of a wildfire and increase the number of people and structures exposed to the risk of loss, injury, or death from wildfires. Individual projects located within Los Angeles County are required to comply with applicable County fire and building codes, which have been increasingly strengthened as a result of severe wildfires that have occurred in the last two decades. The fire and building codes include fire prevention and protection features that reduce the likelihood of a fire igniting in a specific project and spreading to off-site vegetated areas. These codes also protect projects from wildfires that may occur in the area through the implementation of brush management and fuel management zones, ensuring adequate water supply, preparation of fire protection plans, and other measures.

Furthermore, new development would be required to comply with the County's vegetation clearance requirements, as outlined in the County Municipal Code. The Los Angeles County Fire and Building Codes, along with project-specific needs assessments and fire prevention plan requirements, ensure that every project approved for construction includes adequate emergency access. Roads for all proposed projects are required to meet minimum widths, have an all-weather surface, and be capable of supporting the imposed loads of responding emergency apparatus. Therefore, because all projects are required to comply with these requirements, cumulative impacts related to wildfire hazards and emergency response and access would not result in new significant impacts.

Cumulative growth within County Fire's service area has the potential to increase the demand for fire protection and emergency medical services. However, County Fire 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 County Fire's service territory based on distance and availability, without regard to jurisdictional or municipal boundaries. As with the 2017 Project, the Modified Project and all other future development projects in the service area would be required to comply with the County Fire Code and other relevant County Code requirements and other applicable local codes (e.g., City of Santa Clarita Fire Code) and regulations related to fire safety, building construction, access, fire flow, and fuel modification. Further, as with the 2017 Project, the Modified Project and all other future development projects in the service area would be required to satisfy the County's Fire Facility Fee, which funds the purchase of station sites, the construction of new stations and facility improvements, and the funding of capital equipment to mitigate new development's fair share contribution to the need for wildfire protection services, thereby addressing any cumulative increase in demand for County Fire's protective services.

The Area Plan was also adopted after the State-certified EIR's analysis of wildfire impacts. All new development associated with the growth anticipated in the Area Plan takes into account fire prevention, land use, and circulation requirements. As described above, the Area Plan includes a comprehensive evacuation and circulation system that accounted for emergency access and evacuation. Stantec, the transportation consultant for the Modified Project, evaluated the Modified Project's consistency with the Area Plan, which took into account emergency access and evacuation during wildfires and other emergencies based on the buildout (full planned growth) identified by the Area Plan.[38] Stantec determined the Modified Project is consistent with the buildout of the Area Plan

[38] *Stantec, Los Angeles County and the Santa Clarita Area Plan (One Valley One Vision) Circulation, Emergency Access, and Evacuation Framework, pp. 2,5, April 2022.*

area and the Area Plan's planned circulation and transportation system.[39] The Modified Project's Evacuation Plan also determined that the Modified Project would be consistent with, and would not impede, emergency evacuation and access plans identified by the Area Plan, which accounted for the buildout growth of the area.[40]

The Modified Project and other cumulative projects located within the area would be consistent with the overall development, infrastructure, and circulation framework established by the Area Plan and would be required to comply with the California Fire Code, County Fire Code Title 32, and County Fire requirements, which are more stringent than the standards considered in the State-certified EIR. The Modified Project would not increase the number of residents relative to the 2017 Project as analyzed in the State-certified EIR. In addition, PDF-WF-1 through PDF-WF-6 would provide additional environmental and wildfire safety benefits for the Modified Project, further reducing the Modified Project's potential impact related to wildfire relative to the 2017 Project as analyzed in the State-certified EIR. Accordingly, the Modified Project would not result in new or substantially more severe significant cumulative wildfire impacts compared to the State-certified EIR for the 2017 Project.

8. MITIGATION MEASURES

A complete list of mitigation measures to be implemented under the Modified Project is provided in the Mitigation Monitoring and Reporting Program in **Appendix 2** of this SEIR. Previously adopted mitigation measures that are not applicable to the Modified Project or that require no further action as part of the Modified Project (generally because the measure has already been completed or would be achieved or exceeded through compliance with current regulatory requirements) are detailed in **Appendix 3** of this SEIR. As a result, the measures enumerated below may not be sequential.

For reference, the FPP included as **Appendix 5.14a** provides an overview of how the applicable wildfire Mitigation Measures (described in Section 8), Project Design Features (described in Section 4.b), and regulatory compliance measures (described in Section 4.a) relate to the impact criteria discussed in Section 6, above.

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[39] *Stantec, Los Angeles County and the Santa Clarita Area Plan (One Valley One Vision) Circulation, Emergency Access, and Evacuation Framework, April 2022. Refer to **Appendix 5.14d** of this SEIR. See also the Evacuation Plan, in **Appendix 5.14b**, which describes existing condition includes alternatives to reliance on I-5 as part of the baseline, including in extreme snowfall scenarios, referred to by Caltrans as "Operation Snowflake."*

[40] *See the Evacuation Plan included as **Appendix 5.14b** of this SEIR, pp. 5, 31.*

a. Applicable Mitigation Measures from the State-Certified EIR

The following mitigation measures from the State-certified EIR are applicable to the Modified Project to address impacts related to wildfire. Where appropriate, italicized parentheticals are used to provide additional information and clarification regarding the implementation of a particular measure's requirements.:

RMDP/SCP- PH-7: All development of the Newhall Ranch Specific Plan site and the VCC and Entrada Planning Areas shall be in compliance with the provisions of Los Angeles County Code, Title 21, Chapter 21.24, for secondary evacuation access.

(This mitigation measure would be achieved through compliance with the referenced County Code regulatory provisions, which establish secondary evacuation access standards. Because the Modified Project is required to comply with the County Code provisions referenced in this measure, no further action on this measure is required.)

RMDP/SCP- PH-14: At the time of final subdivision maps permitting construction in development areas that are adjacent to Open Area and the High Country SMAs, a Wildfire Fuel Modification plan shall be prepared in accordance with the fuel modification ordinance standards in effect at that time and shall be submitted for approval to the Los Angeles County Fire Department. The Wildfire Fuel Modification plan shall depict a fuel modification zone, the size of which shall be consistent with the Los Angeles County fuel modification ordinance requirements. Within the zone, tree pruning, removal of dead plant material and weed and grass cutting shall take place as required by the fuel modification ordinance. The Wildfire Fuel Modification plan shall include the following construction period requirements: (a) a fire watch during welding operations; (b) spark arresters on all equipment or vehicles operating in a high fire hazard area; (c) designated smoking and non-smoking areas; and (d) water availability pursuant to the Los Angeles County Fire Department requirements. The fuel modification zone will not extend onto any spineflower preserve.

b. Previously Approved Mitigation from the VCC EIR

The VCC EIR did not specifically address impacts to wildfire in a topical section. There are no mitigation measures from the VCC EIR that are applicable to the Modified Project to address impacts related to wildfire.

c. Proposed Mitigation for the Modified Project

No additional mitigation measures are required for the Modified Project.

9. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The State-certified EIR found that the 2017 Project's wildfire impacts would be significant prior to mitigation, though impacts would be reduced to a less than significant level with regulatory compliance and implementation of mitigation measures.[41] The State-certified EIR also determined that the 2017 Project would have a less than significant impact on adopted emergency response plans or emergency evacuation plans based on the location of fire stations, a system of improved roads, and fire flows.[42]

The Modified Project would not increase or exacerbate the wildfire risks identified for the 2017 Project, as analyzed in the State-certified EIR. With adherence to applicable Fire Code requirements and other regulations, including regulatory requirements discussed previously, as well as Mitigation Measures RMDP/SCP-PH-7 and RMDP/SCP- PH-14, the Modified Project would not result in any new significant impacts or substantially more severe significant impacts as compared to the State-certified EIR for the 2017 Project. In addition, PDF-WF-1 through PDF-WF-6 would provide additional wildfire safety benefits associated the Modified Project, further reducing the Modified Project's impacts related to wildfire.

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[41] *See Final State-certified EIR, pp. 4.17-60 to 4.17-61.*

[42] *See Final State-certified EIR, p. 4.17-60.*