

22. Wildfire Hazards

22.1 BACKGROUND AND CONTEXT

This section focuses on the rural or wildland areas of Ventura County and wildfire impacts that could potentially result from a proposed project located in or *adjacent* to County designated *Hazardous Fire Areas (HFAs)* identified pursuant to the Ventura County Fire Code, as well as *Fire Hazard Severity Zones (FHSZ)* in State Responsibility Areas (SRAs) as defined in Public Resources Code (PRC) Section 4102, and Local Responsibility Areas (LRAs), which are areas where a local governmental agency is primarily responsible for preventing and suppressing wildfires.

HFAs include areas where brush can be found growing in a natural state, which is most common on undeveloped land and hillside areas. *HFAs* may overlap with designated SRAs and LRAs. For purposes of the Ventura County Fire Code, areas classified as a *HFA* are designated as a Wildland-Urban Interface¹⁰ area. Additional information on wildfires and *fire hazards* specific to Ventura County can be found in Section 11.3 of the Ventura County General Plan Background Report.

California law requires the State Fire Marshal to identify *FHSZ* areas based on the severity of *fire hazard* that is expected to prevail there. These areas, or “zones” are identified based on factors such as fuel (material that can burn), slope, and weather. There are three zones, based on increasing *fire hazard*: moderate, high, and very high. Within unincorporated Ventura County, *FHSZs* are located in mountainous or hillside areas where the greatest fuel density exists and are classified as very high *FHSZ*.

By their designation, *HFAs* are prone to wildland fires and have a higher potential for severe fire events. Because the effects of a wildfire are not limited to development within a *HFA*, and can easily spread to *adjacent* communities, any development in or *adjacent* to a *HFA* is at risk of wildfire. The adopted Ventura County Multi-Jurisdictional Hazard Mitigation Plan identifies mitigation strategies to minimize *fire hazard* risks, discourages development in *HFAs*, and requires development to implement a variety of best management practices and design standards to ensure development is fire resistant. In addition, the adopted Ventura County Emergency Operations Plan provides guidance for responding to large-scale emergencies. While compliance with local, state, and federal requirements reduces risk to new development, this risk cannot be completely eliminated.

22.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below. California Environmental Quality Act (CEQA) Guidelines Section 15126.2(a) provides guidance for when and how the effects of locating projects in hazardous or vulnerable locations should be analyzed under CEQA. A *Lead Agency* is not required to perform “reverse CEQA analysis” by analyzing the impacts of the existing environment on the

¹⁰ A wildland-urban interface is defined in the Ventura County Fire Code, as may be amended, which states: a geographical area identified by the state as a *FHSZ* in accordance with the Public Resources Code Sections 4201 through 4204 and Government Code Sections 51175 through 51189, or other areas designated by the Ventura County Fire Protection District to be at a significant risk from wildfires, including *HFAs*.

project and its future users unless the project has a reasonably foreseeable risk of causing or exacerbating existing environmental hazards by bringing development or people into the area affected. Within this analytical framework, CEQA Guidelines Section 15126.2(a) states that “the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions... including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazardous areas.” The thresholds of significance below should be interpreted and applied in accordance with this guidance.

- WIL-1** If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- WIL-2** If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes.
- WIL-3** If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would require the installation or maintenance of infrastructure to accommodate the project (such as roads, *fuel breaks*, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in substantial temporary or ongoing impacts to the environment.
- WIL-4** If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would substantially impair or obstruct implementation of the Ventura County Emergency Operations Plan.
- WIL-5** If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would substantially impair or obstruct primary or alternative evacuation routes.

22.3 IMPACT ANALYSIS

The *Lead Agency* should review, in consultation with the Ventura County Fire Protection District (VCFPD), the project description materials (site plan, grading plans, etc.), topographic maps and aerial maps, and if necessary, visit the project site in order to determine the following:

- Whether the project site is located in or *adjacent* to a *HFA*. Consult with the VCFPD for maps and digital map layers that depict the most up-to-date boundaries of the *HFA*. Projects located within a *HFA* shall be required to provide a *Fire Protection Plan* prepared by a qualified fire protection consultant as approved by the *Lead Agency* in consultation with VCFPD. Refer to Section 4903 of the Ventura County Fire Code for guidance on preparing a *Fire Protection Plan*.
- Evaluate whether the project would result in or substantially exacerbate risk of loss, injury, or death involving wildfire, including exposure to pollutant concentrations from a wildfire, downslope or downstream flooding or landslides resulting from post-fire runoff, slope instability, or drainage changes.

- Evaluate whether the project includes design measures to create defensible space, installation or maintenance of infrastructure such as roads, *fuel breaks*, emergency water sources, power lines, or other utilities. Determine whether the installation or maintenance of such infrastructure would exacerbate risk of loss, injury, or death involving wildfire, or would result in substantial temporary or ongoing impacts to the environment.
- Determine whether access to and from the project site would impair, hinder, or otherwise obstruct the implementation of the Ventura County Emergency Operations Plan.
- Determine whether the project would impair, hinder, or otherwise obstruct primary or alternative evacuation routes. Consult with the Ventura County Sheriff's Office and VCFPD to verify primary or alternative evacuation routes within the vicinity of the project.

Projects are required to comply with state laws regarding defensible space (Cal. Code Regs. Title 14, Section 1299.03 *et seq.*) and minimum fire safe regulations (Cal. Code Regs. Title 14, Section 1270.00 *et seq.*), Ventura County Building Code, and the Ventura County Fire Code. The Ventura County Fire Code requires the clearing of brush, flammable vegetation, or combustible growth within 100 feet of structures or buildings; automatic fire sprinklers in buildings; access roads/driveways and water supplies for first responder use and for safety precautions within *HFAs*. Site-specific constraints may require additional mitigation to reduce *fire hazard* risk to a less than significant level. Consult with the VCFPD to determine whether the project would result in potentially significant impacts and whether mitigation measures would be required.

Preparation of Initial Study Checklist

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 22.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

- a) *If located in or adjacent to an HFA, would the project exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, which has the potential to exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level .

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when it has been determined that the project will result in or substantially exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project will result in or substantially exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and an EIR will be required to further analyze the impact.

b) *If located in or adjacent to an HFA, would the project expose people or structures to a significant risk of loss, injury or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes?*

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, which has the potential to expose people or structures to a significant risk of loss, injury or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project will result in or substantially expose people or structures to a significant risk of loss, injury, or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project will result in or substantially expose people or structures to a significant risk of loss, injury, or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes, and an EIR will be required to further analyze the impact.

c) *If located in or adjacent to an HFA, would the project require the installation or maintenance of infrastructure to accommodate the project (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in substantial temporary or ongoing impacts to the environment?*

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, and requires the installation or maintenance of infrastructure to accommodate the project, which has the potential to exacerbate fire risk or result in temporary or ongoing impacts to the environment, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project requires the installation or maintenance of infrastructure to accommodate the project, which will exacerbate fire risk or result in temporary or ongoing impacts to the

environment. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project requires the installation or maintenance of infrastructure to accommodate the project, which will exacerbate fire risk or result in temporary or ongoing impacts to the environment, and an EIR will be required to further analyze the impact.

d) *If located in or adjacent to an HFA, would substantially impair or obstruct implementation of the Ventura County Emergency Operations Plan?*

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, and has the potential to impair or obstruct implementation of the Ventura County Emergency Operations Plan, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project would substantially impair or obstruct implementation of the Ventura County Emergency Operations Plan. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would substantially impair or obstruct implementation of the Ventura County Emergency Operations Plan, and an EIR will be required to further analyze the impact.

e) *If located in or adjacent to an HFA, would substantially impair or obstruct primary or alternative evacuation routes?*

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, and has the potential to impair or obstruct primary or alternative evacuation routes, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project would impair or obstruct primary or alternative evacuation routes. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would substantially impair or obstruct primary or alternative evacuation routes, and an EIR will be required to further analyze the impact.

22.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF Website
References		
California Environmental Quality Act	California Governor’s Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
Fire Hazard Severity Zones in Local Responsibility Areas (LRAs)	Office of the State Fire Marshal	Website
Fire Hazard Severity Zones in State Responsibility Areas (SRAs)	Office of the State Fire Marshal	Website
Ventura County Building Code	Ventura County RMA Building & Safety Division	Website
Ventura County Fire Code (Ordinance Number 32)	Ventura County Fire Department	PDF Website
Ventura County General Plan Background Report, Chapter 11	Ventura County RMA Planning Division	PDF Website
Ventura County Multi-Jurisdictional Hazard Mitigation Plan	Ventura County Sheriff’s Office of Emergency Services	PDF Website
Ventura County Emergency Operations Plan	Ventura County Sheriff’s Office of Emergency Services	PDF Website