

3.16 Wildfire Hazards

3.16.1 Introduction

This chapter addresses potential wildfire impacts that may result from the proposed Project (Project). The following discussion addresses existing wildfire hazard conditions of the Project area and construction site surroundings, considers applicable goals and policies, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from the Project, as applicable.

3.16.2 Regulatory Setting

3.16.2.1 Federal

Federal Wildland Fire Management Policy

The 1995 Federal Wildland Fire Management Report produced the first single comprehensive federal fire policy for the Departments of the Interior and Agriculture. That review was stimulated by the 1994 fire season with its 34 fatalities and growing recognition of fire problems caused by fuel accumulation. The resulting 1995 Federal Fire Policy recognized, for the first time, the essential role of fire in maintaining natural systems

In the aftermath of the escape of the Cerro Grande Prescribed Fire in May of 2000, the Secretaries of the Interior and Agriculture requested a review of the 1995 Federal Fire Policy and its implementation.

The 2001 Federal Fire Policy and its implementation are founded on the following Guiding Principles:

- Firefighter and public safety is the first priority in every fire management activity.
- The role of wildland fire as an essential ecological process and natural change agent will be incorporated into the planning process.
- Fire management plans, programs, and activities support land and resource management plans and their implementation.
- Sound risk management is a foundation for all fire management activities.
- Fire management programs and activities are economically viable, based upon values to be protected, costs, and land and resource management objectives.
- Fire management plans and activities are based upon the best available science.
- Fire management plans and activities incorporate public health and environmental quality considerations.
- Federal, State, tribal, local, interagency, and international coordination and cooperation are essential.
- Standardization of policies and procedures among federal agencies is an ongoing objective.

3.16.2.2 State

California Department of Forestry and Fire Protection (Cal Fire)

Cal Fire protects the people of California from fires, responds to emergencies, and protects and enhances forest, range, and watershed values providing social, economic, and environmental benefits to rural and urban citizens. Cal Fire's firefighters, fire engines, and aircraft respond to an average of more than 5,600 wildland fires each year (Cal Fire 2012). The Office of the State Fire Marshal supports Cal Fire's mission by focusing on fire prevention. It provides support through a wide variety of fire safety responsibilities including by regulating buildings in which people live, congregate, or are confined; by controlling substances and products which may, in and of themselves, or by their misuse, cause injuries, death, and destruction by fire; by providing statewide direction for fire prevention in wildland areas; by regulating hazardous liquid pipelines; by reviewing regulations and building standards; and by providing training and education in fire protection methods and responsibilities.

2018 Strategic Fire Plan for California

2018 Strategic Fire Plan for California (2018 Plan) is a cooperative effort between the State Board of Forestry and Fire Protection and the California Department of Forestry and Fire Protection.

In 2018, the Board of Forestry and Fire Protection adopted a new strategic fire plan to update and address fire concerns in California. The Board has adopted fire plans since the 1930s and periodically updates them to reflect current and anticipated needs. Over time, as the environmental, social, and economic landscape of California's wildlands has changed, the Board has evolved the Strategic Fire Plan to better respond to these changes and to provide the Cal Fire with appropriate guidance "...for adequate statewide fire protection of state responsibility areas." (Public Resources Code (PRC) Section 4130). The 2018 Plan calls for a natural environment that is more fire resilient; buildings and infrastructure that are more fire resistant; and a society that is more aware of and responsive to the benefits and threats of wildland fire; all achieved through local, state, federal, tribal, and private partnerships.

The goals that are critical to achieving the 2018 Plan's vision revolve around fire prevention, natural resource management, and fire suppression efforts, as broadly construed. Major components are:

- 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.

California Public Resources Code

Fire Hazard Severity Zones – Public Resources Code Sections 4201–4204

PRC Sections 4201–4204, directed Cal Fire to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as fire hazard severity zones (FHSZ), define the application of various mitigation strategies to reduce risk associated with wildland fires. Since the Project takes place throughout the City of Los Angeles (City), the construction sites may be located in Local Responsibility Areas (LRAs).

Very High Fire Hazard Severity Zones - Government Code Sections 51175–89

In 1992, Government Code Sections 51175–51189 established the classification for very high fire hazard severity based on fuel loading, terrain, weather, and other relevant factors identified by Cal Fire as major causes of wildfire spread and on the severity of fire hazard that is expected to prevail in those areas. The code established the requirements for those that maintain an occupied dwelling within a designated very high fire hazard severity zone (VHFHSZ). The VHFHSZs define the application of mitigation measures to reduce risk associated with uncontrolled wildfires and require that the measures be taken. Local agency designates the VHFHSZs within its jurisdiction as required by Cal Fire. Where local fire protection agencies, such as the LAFD, are responsible for wildfire protection, the land is classified as a LRA. Hence, the VHFHSZ in the City are classified as such under LRA.

Senate Bill 1241

In 2012, Senate Bill 1241 added Section 66474.02 to Title 7 Division 2 of the California Government Code, commonly known as the Subdivision Map Act. The statute prohibits subdivision of parcels designated very high fire hazard, or that are in a State Responsibility Area (SRA) unless certain findings are made prior to approval of the tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are, in brief: (1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in PRC Section 4290-91, (2) structural fire protection services will be available for the subdivision through a publicly funded entity, and (3) ingress and egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

Fire Safe Development Regulations

In 1991, the Fire Safe Development Regulations were developed to implement PRC Section 4290 and stipulate minimum requirements for building construction in SRAs. These regulations address ingress and egress (road widths, turnouts, etc.), building and street sign visibility, emergency water standards, and fuel modification. In June 2012, Cal Fire and the Board of Forestry and Fire Protection formed a workgroup to revise the Fire Safe Development Regulations. Changes to the regulations were effective January 1, 2016. This workgroup was re-engaged in 2017 to align the update timeline for the Fire Safe Regulations with the triennial California Fire Code cycle. The workgroup has been reviewing the existing regulations based on feedback received from the 2016 updates to reduce inconsistencies and improve clarity. These changes are anticipated to be effective with the 2020 California Fire Code on January 1, 2020.

California Building Code and Fire Code

The California Code of Regulations (CCR), Title 24, is a compilation of building standards, including fire safety standards for residential and commercial buildings. The California Building Code standards serve as the basis for the design and construction of buildings in California. The California Fire Code is a component of the California Building Code. Typical fire safety requirements of the California Fire Code include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The California Fire Code applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific California Fire Code regulations have been incorporated by reference, with amendments, in the Los Angeles Building Code, Fire Safety Regulations.

3.16.2.3 Local

City of Los Angeles Municipal Code

The City Municipal Code (LAMC) contains 18 chapters, including a Public Safety and Protection (Chapter 5) (City of Los Angeles 2013). Article 2, in Chapter 5 of LAMC, titled Police and Special Officers, contains regulations governing administrative issues, such as requirements for police badges and uniforms, and Article 7, titled Fire Protection and Prevention, contains the fire code for the City. The City Fire Code (Fire Code) in Section 57 et al. of the LAMC, prescribes laws that may be enforced by the LAFD to help safeguard life and property from fire, explosion, panic, or other hazardous conditions that may arise in the City. The Fire Code includes information pertaining to administrative issues, such as the requirements for filling out and submitting Hazardous Materials Release Response Plans and Inventory Statements, and technical requirements associated with the storage, management, and disposal of hazardous materials, such as underground chemical storage tanks, asbestos-containing materials/asbestos-containing building material, and various other combustible and flammable materials.

The Fire Code also includes mandates from the State of California's Fire Code. VHFHSZs are lands designated by the LAFD pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code Section. VHFHSZs were first established in the City in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone."

Brush Clearance Requirements

California has seen an increase in frequency and size of wildfires, including historic brushfires in the City such as the La Tuna, Creek, and Skirball fires. Additionally, smaller brushfires have been accidentally started by well-intentioned residents performing brush clearance. On October 17, 2018, Los Angeles City Council adopted Ordinance No. 185789. This Ordinance addresses Section 57.305.5.2 and 57.332.1, 57.322.1.1.10 and 57.322.1.1.10.1 and amended Section 57.322.1.1 to Article 7, Chapter V of the LAMC. Through the Ordinance, the new and amended sections of the LAMC prohibit the use of certain metal cutting blades for brush clearance activities in VHFHSZs, and establish specific requirements, and penalties for violations for brush clearance activities. The applicable requirements (from each LAMC section) for brush clearing activities in the VHFHSZ are listed as project design features of this Project in Section 3.16.4.2 below.

City of Los Angeles General Plan Framework Element

The City General Plan Framework Element (Framework), adopted in December 1996 and readopted in August 2001, provides a comprehensive, long-range strategy for accommodating long-term growth in the City. The Infrastructure and Public Services chapter of the Framework sets forth goals, objectives, and policies for fire protection and emergency medical services (EMS) in the City. The objectives and policies in the Infrastructure and Public Services chapter ensure that every neighborhood has the necessary level of fire protection service, EMS, and infrastructure. Under the Framework, the City standard for response distance from the fire station to the destination location is 1.5 miles (City of Los Angeles 1995), which is consistent with the specifications for response distances in LAMC.

City of Los Angeles General Plan Safety Element

The City General Plan Safety Element recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies.

The Safety Element of the City General Plan sets forth specific policies and objectives related to safety. These policies and objectives emphasize hazard mitigation, emergency response, and disaster recovery. The Safety Element serves as a guide for the construction, maintenance, and operation of fire protection facilities in the City. It sets forth policies and standards for fire station distribution and location, fire suppression water flow (or “fire flow”), firefighting equipment access, emergency ambulance services, and fire prevention activities. Population density, nature of on-site land uses, and traffic flow are also considered by LAFD in evaluating the adequacy of fire protection services throughout the City.

City of Los Angeles Emergency Operations Organization and Hazard Mitigation Plan

The Department of Emergency Operations Organization (EEO) within the City is responsible for the City's emergency preparations (planning, training and mitigation), response and recovery operations. The EEO is comprised of all agencies of the City's government and centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources.

The City 2018 Hazard Mitigation Plan (HMP), which is prepared to lessen the vulnerability to disasters and to reduce risks from natural hazards. An HMP serves as a guide for decision makers as they commit City resources to minimize the effects of natural hazards. The HMP integrates with existing planning mechanisms such as building and zoning regulations, long-range planning mechanisms, and environmental planning. The planning process includes conducting a thorough hazard vulnerability analysis, creating community disaster mitigation priorities, and developing subsequent mitigation strategies and projects.

Los Angeles Fire Department Strategic Plan 2018-2020

The LAFD Strategic Plan 2018-2020, A Safer City 2.0, is the next generation of the first ever LAFD Strategic Plan. A Safer City 2.0 focuses on five goals to guide the LAFD in the next three years:¹

1. Provide Exceptional Public Safety and Emergency Service,
2. Embrace a Healthy, Safe and Productive Work Environment,
3. Capitalize on Advanced Technology
4. Enhance LAFD Sustainability & Community Resiliency,
5. Increase Opportunities for Personal Growth and Professional Development.

The LAFD provides fire prevention, firefighting, medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services to approximately 3.9 million people (U.S. Census Bureau 2016) in the City. LAFD comprises of 3,246 uniformed fire personnel and 353 professional support personnel (Los Angeles Fire Department 2018). LAFD currently operates 114 fire stations which house emergency response personnel and equipment. The LAFD addresses fire emergencies (e.g., structural, vegetation, and automobile); medical aid emergencies (all chief complaints including vehicle accidents); special rescue emergencies (e.g., confined space rescue, trench rescue, low angle rescue, high angle rescue, and water rescue); hazardous materials incidents (including explosive devices and weapons of mass destruction); and mass disaster incidents (e.g., earthquakes, flooding, and wind).

3.16.3 Environmental Setting

A wildfire is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. A wildland-urban interface is an area where urban development is located in proximity to open space or “wildland” areas. The potential for wildland fires represents a hazard where development is adjacent to open space or within close proximity to wildland fuels or designated fire severity zones. The hot, arid climate of the City, especially during the summer and fall, can dry out vegetation and cause dry brush to be prone to fires caused by lightning strikes and spontaneous combustion. Steep hillsides and varied topography within portions of the City also contribute to the risk of wildland fires. Fires that occur in wildland-urban interface areas may affect natural resources as well as life and property.

Cal Fire has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). These maps place areas of the state into different FHSZ based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, land where Cal Fire is responsible for wildland fire protection and generally located in unincorporated areas is classified as a SRA. This map is available at <https://egis.fire.ca.gov/arcgis/rest/services/FRAP/SRA/MapServer>. In addition to establishing local or state responsibility for wildfire protection in a specific area, Cal Fire identifies the VHFHSZ, and a city, by ordinance, designates areas as VHFHSZ or non-VHFHSZ within their jurisdiction. Where local fire protection agencies, such as the LAFD, are responsible for wildfire protection, the land is classified as a LRA. Hence, the VHFHSZ in the City are classified as such under LRA.

¹ <http://www.lafd.org/about/about-lafd/strategic-plan>

The City first established its VHFHSZ in the in 1999 which replaced the older “Mountain Fire District” and “Buffer Zone.” The statewide VHFHSZ was carefully determined according to California Government Code, Sections 51175 through 51189, and thus, under the direction of Cal Fire, the City determined the VHFHSZ boundaries within its jurisdiction, as defined in LAMC Sections 57.4908.1.1 through 57.4908.1.3. The City VHFHSZ comprises most of the hilly and mountainous regions including portions of the following communities: Baldwin Hills, Bel Air Estates, Beverly Glen, Brentwood, Castellammare, Chatsworth, Eagle Rock, East Los Angeles, Echo Park, El Sereno, Encino, Glassell Park, Granada Hills, Hollywood, Lake View Terrace Los Angeles, Los Feliz, Montecito Heights, Monterey Hills, Mount Olympus, Mount Washington, Pacific Palisades, Pacoima, Palisades Highland, Porter Ranch, San Pedro, Shadow Hills, Sherman Oaks, Silver Lake, Studio City, Sunland, Sun Valley, Sylmar, Tarzana, Tujunga, West Hills, Westwood, Woodland Hills. The City VHFHSZ is widespread and thus, the possibility exists that sidewalk and curb ramp repair could occur within or adjacent to a VHFHSZ zones. The City VHFHSZs are identified in LAMC Section 57.4908.1.1, Figure 3.16-1.

3.16.4 Environmental Impact Analysis

3.16.4.1 Approach

The wildfire resource category was added to the Initial Study/Appendix G checklist of the California Environmental Quality Act (CEQA) Guidelines in December 2018 by the California Natural Resources Agency. The project design features and thresholds analysis are based on Section 3.16.2 *Regulatory Setting* and applicable laws and regulations as noted in the impact findings.

3.16.4.2 Project Design Features

PDF-WF-1: The Project Manager is responsible for compliance with applicable LAMC Fire Code Section 57 et seq. for construction sites on, adjacent to or in the immediate vicinity of a VHFHSZ as designated through LAMC Sections 57.4908.1.1 through 57.4908.1.3 and identified on City maintained databases such as NavigateLA and Zone information and Map Access System (ZIMAS) (which have digitalized LA General Plan and zoning maps).

PDF-WF-2: No person shall travel or trespass upon any firebreak or fire road as stated in Section 57.4908.8.2 of the LAMC.

PDF-WF-3: Pursuant to LAMC Section 57.4908.5 open flame is prohibited upon any road, street, or fire road with the VHFHSZ

PDF-WF-4: No smoking is allowed where conditions are such as to make smoking a hazard and in spaces where flammable or combustible materials are stored or handled per Section 310.2 of the California Fire Code. Further, it shall be unlawful for any person to light, ignite or smoke any cigar, cigarette, tobacco in a pipe or other form of smoldering substance within the VHFHSZ compliant with LAMC Section 57.4908.6. The Section also prohibits open flame upon any road, street, or fire road within the VHFHSZ.

PDF-WF-5: No person, except one authorized and acting within the scope of his official duties, shall remove, deface, mar, mutilate, or change the position of any sign, installed by the Chief pursuant to this article, designating “CLOSED AREA,” “NO SMOKING,” “NO OPEN FIRES,” “RESTRICTED ENTRY,” or other sign or device installed to give warning and to regulate persons’ actions within the VHFHSZ as stated in Section 57.4908.9.1.

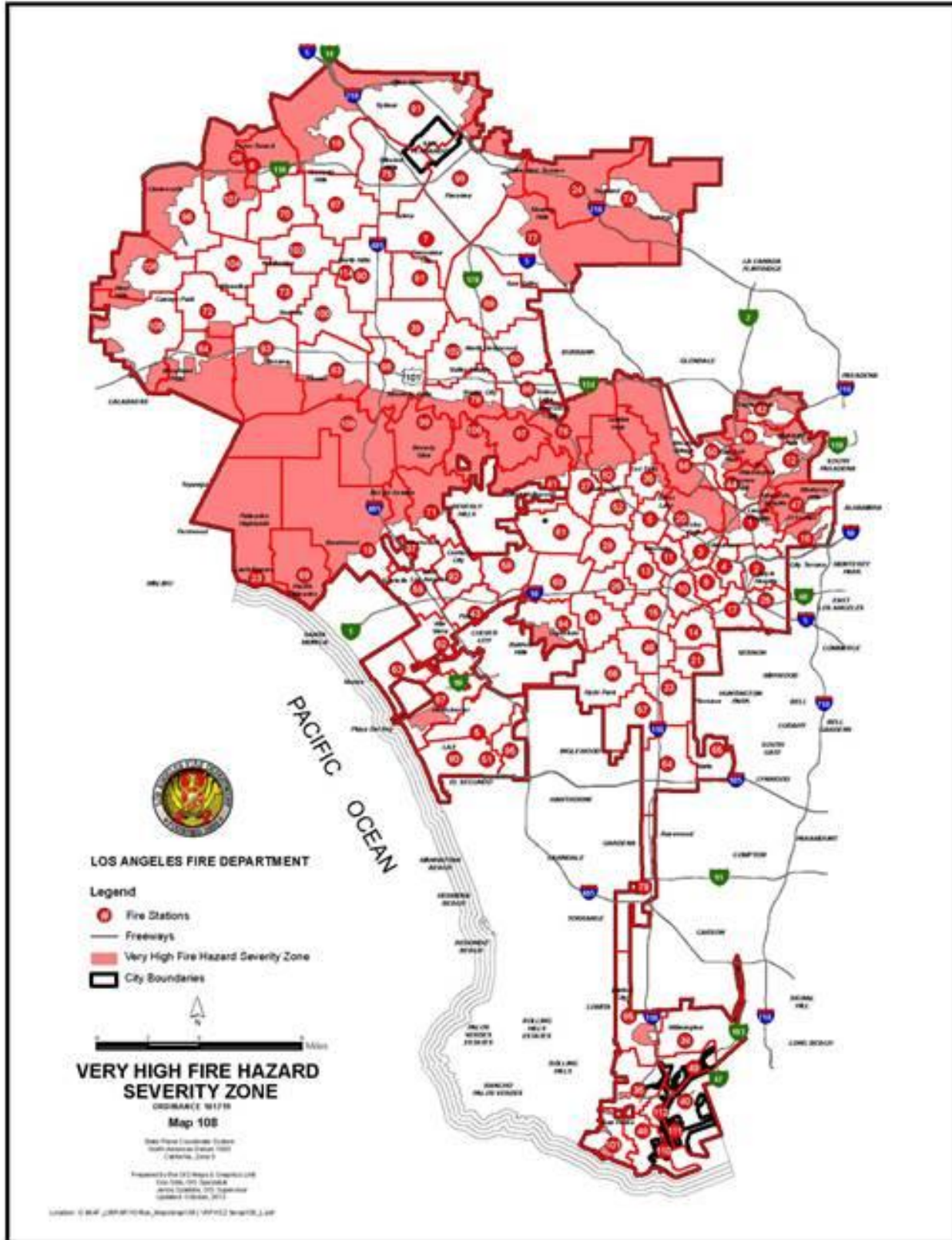


Figure 3.16-1. Very High Fire Hazard Severity Zone

PDF-WF-6: Pursuant to Ordinance No. 185789 which added Sections 57.305.5.2, 57.305.5.2.1, 57.322.1.1.10 and 57.322.1.1.10.1, and amended Section 57.322.1.1 to Article 7, Chapter V of the LAMC, the applicable requirements for brush clearing activities in the VHFHSZ would apply including, but not limited to:

- Use of metal cutting blades for grass or brush clearance shall be limited to those which are non-ferrous/non-sparking.
- Brush clearance cannot be done on red flag days, when fire weather conditions are at their peak.
- Individuals engaged in brush clearance operations shall not engage in any other activities during their actual clearance of grass or brush.
- Individuals engaged in grass or brush clearance operations shall use an appropriate extinguishing agent immediately to extinguish a fire.
- All fires, regardless of size, shall be reported immediately via the 9-1-1 system to the Fire Department.
- An approved fire extinguisher, or a pressurized garden hose with attached nozzle shall be within 10 feet of any grass or brush clearance operation, to quickly extinguish a small fire before it burns out of control.
- Where a gasoline container is present at the site of the grass or brush clearance operation, a minimum 4A 60 BC dry chemical fire extinguisher shall be within 10 feet of the brush clearance operation.
- A cell phone capable of dialing 9-1-1 shall be charged and readily accessible to the grass or brush clearance operation.
- A safety strap shall be used at all times for any tool or appliance with hot exhaust. Hot exhaust shall not come in contact with any brush, grass, flash fuels, or other flammable material.

3.16.4.3 Thresholds of Significance

The following new Appendix G questions identify factors to be considered for determining whether a project could have significant impacts related to wildfire hazards in a VHFHSZ or near or in an SRA. In these areas, would the project:

WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan? *Appendix G of the CEQA Guidelines.*

WF-2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? *Appendix G of the CEQA Guidelines.*

WF-3: 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? *Appendix G of the CEQA Guidelines*

WF-4: 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? *Appendix G of the CEQA Guidelines.*

3.16.4.4 Construction Impacts

WF-1. If located in or near SRAs or lands classified as VHFHSZs, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

This impact would be less than significant during construction.

Cal Fire identifies the VHFHSZ, and a city, by ordinance, designates areas as VHFHSZ or non-VHFHSZ within their jurisdiction. See Figure 3.16-1 for areas within the City that are designated as a VHFHSZ. Where local fire protection agencies, such as the LAFD, are responsible for wildfire protection, the land is classified as a LRA. Therefore, the VHFHSZs in the City are classified as such under LRA. During construction and where feasible, staging would be adjacent to the sidewalk improvement activities. Therefore, staging areas could affect adjacent sidewalks and streets in front of construction areas. If this is the case, traffic control would be employed to re-route pedestrians around the sidewalk construction area and signage would be posted to direct pedestrians and drivers. As detailed in Chapter 3.12, *Transportation/Traffic*, construction managers and personnel would follow Work Area Traffic Control Handbook (WATCH) and/or Manual on Uniform Traffic Control Devices (MUTCD) guidelines to ensure the safety of vehicle, pedestrian, and bicycle traffic during re-routing. Adequate emergency access would be maintained during lane closures along major and secondary highways and collectors for a less-than-significant impact, and compliance with the WATCH manual guidelines would ensure a less-than-significant impact. If temporary lane closures are required for improvements, coordination with the Los Angeles Department of Transportation (LADOT) would be conducted for traffic control, signage, and coordination, as stated in PDF-TR-1. Potential impacts on emergency response or evacuation plans or routes would be less than significant.

During substantial utility relocation work, street closures for vehicle and pedestrian traffic may be required. However, access on roads would be available for emergency personnel, traffic control, signage, coordination LADOT (as appropriate) and implementation of WATCH and/or MUTCD guidelines would also take place. Furthermore, the California Hazardous Material Incident Contingency Plan (HMICP), developed by the State's Office of Emergency Services (OES), includes several different scenarios of emergency responses to reduce confusion, improve safety, organize and coordinate actions in case of major unforeseen circumstances. The HMICP is anticipated to be utilized by local governments to clarify agency roles and relationships concerning hazardous material emergencies, as stated in PDF-HAZ-2. Therefore, potential impacts on emergency response or evacuation plans or routes would be less than significant.

Mitigation Measures

No mitigation is required.

WF-2. If located in or near SRAs or lands classified as VHFHSZs, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impacts would be less than significant during construction.

The Project consists of the continuation of sidewalk and curb ramps repair throughout the City. This work would require, in some areas, street tree removals and replacement, canopy pruning, or root pruning, as well as utility relocations. City maintained databases such as NavigateLA and ZIMAS (which have digitalized City General Plan and zoning maps) identify areas that are designated

VHFHSZ. This information is derived from planning documents such as City General Plan, specific plans, community plans, etc. and is now digitally available through geographic information systems. As can be noted, portions of the City are located within VHFHSZ zones as seen in Figure 3.16-1; thus, it is possible that construction activities could occur near or adjacent to such areas. However, as mentioned, the work would be on concrete sidewalks, curbs, gutters, ramps. Some infrastructure would be metal like maintenance hold lids, gutter grills, or utility pipes. Even though construction activities could occur on slope or in prevailing wind conditions, it would be on existing built environment like concrete and/or metal and/or street tree wells- none are flammable and it is not foreseeable that any of the work on such preexisting built environments would be performed near a flammable wildfire source such as to cause any exacerbation of wildfire risks. Thus, the impact would be less than significant. There are no occupant structures that would be part of the continuing repair activities from the Project. Compliance with the existing laws such as those in LAMC Fire Code Section 57 et seq. mentioned in PDF-WF-1 through PDF-WF-6, for construction sites on, adjacent to or in the immediate vicinity of a VHFHSZ, which would be reviewed and identified in NavigateLA and/or ZIMAS will avoid worker mishaps.

Although fire can be a potential threat in some areas of the City, the Project would not include housing or commercial development and would not draw a substantial amount of people during construction activities. The Project is not intended to change the use of the sidewalks. This work would require, in some areas, street tree removals and replacement, canopy pruning, or root pruning, as well as utility relocations. Minor utility relocation typically requires a trench of 36 inches deep as well as mini-excavators, staging areas for excavated soils, and a tamper rammer for compacting soils. Minor utility relocation could take a minimum average of approximately 5 days whereas, substantial utility relocation could take up to approximately 30 days. This may include utility relocation, 36- or 76-inch-deep trenching. As discussed in detail in Chapter 2, *Project Description*, the minor utility laterals such as gas and water service laterals may need to be encountered; or a utility cover may need to be replaced. Such activities do not exacerbate or reduce the wildfire risks. The brush clearance and compliance with the existing regulations mentioned in PDF-WF-1 through PDF-WF-6 would avoid the possibility of injury to people and a threat to the environment as a result of the construction activities from the sites located in or near SRAs or lands classified as VHFHSZ, or due to slope, prevailing winds, and other factors. The Project will result in a less-than-significant impact related to exacerbating wildfire risks, and would not affect the exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Mitigation Measures

No mitigation is required.

WF-3. If located in or near SRAs or lands classified as VHFHSZs, 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 on the environment?

This impact would be less than significant during construction.

As noted above in the discussion in WF-2, the Project would be limited to continuing activities to replace the existing affected sidewalks and streetscape. Other than the elements of the Project as discussed in Chapter 2, *Project Description*, the Project would not require installation or maintenance

infrastructure due to the Project site being located in a VHFHSZ. The Project components themselves, however, like substantial utility work in Scenario 2, may include catch basins, storm drain reconstruction, street sign relocation, or other overhead utility work, as detailed in the *Project Description*, in areas that are classified as VHFHSZ. Such work does not change the risk of the existing conditions of an area that is classified as a VHFHSZ. Compliance with established regulations and applicable laws such as those by the City General Plan's Safety Element, the Los Angeles County Fire Department, and in the LAMC, etc., as discussed in 3.16.2 *Regulatory Setting*, and the best management practices listed in PDF-WF-1 through PDF-WF-6 would reduce probability of worker injury, or threat to property or infrastructure. Therefore, the Project would not require the installation or maintenance of additional Project 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 on the environment

Mitigation Measures

No mitigation is required.

WF-4. If located in or near SRAs or lands classified as VHFHSZs, 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?

This impact would be less than significant during construction.

Cal Fire identifies the VHFHSZ, and a city, by ordinance, designates areas as VHFHSZ or non-VHFHSZ within their jurisdiction. See Figure 3.16-1 for areas within the City that are designated as a VHFHSZ. Where local fire protection agencies, such as the LAFD, are responsible for wildfire protection, the land is classified as a LRA. Therefore, the VHFHSZs in the City are classified as such under LRA.

Changes in street tree canopy due to street tree removal and replacement were modeled to determine the potential change to surface runoff, infiltration, and water quality within sidewalk areas. There would be no increase in impervious cover due to sidewalk repair activities because only the existing sidewalk would be replaced. Even though sidewalk replacements may involve minor widening of existing sidewalks in some locations to comply with applicable accessibility requirements, widening is anticipated to replace existing impervious surfaces and/or be offset by the widening of street tree wells from 4x4 to 4x6 consistent with the proposed Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program, such that there would be no net increase in impervious surfaces. Existing drainage patterns would be generally maintained by the Project.

The Project includes the continuation of repair and upgrading City owned-and-operated sidewalks and curb ramps in public areas throughout the City. This work would require, in some areas, street tree removals and replacement, canopy pruning, or root pruning, as well as utility relocations. Project implementation does not include any habitable structures. Implementation of the Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

Mitigation Measures

No mitigation is required.

3.16.4.5 Operational Impacts

The continuation of operational activities from the Project would include sidewalk inspection and street tree monitoring and watering with a hose that is attached to a water tank on a pick-up truck. During construction activities, the street trees would have been planted in a 4- by 6-foot street tree well, per the proposed Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program. As discussed Chapter 2, *Project Description*, the street trees will be manually watered 33 times annually. For the times when manual watering is not feasible, two 15-gallon water bags would be placed in the street tree well for the new street trees until the next scheduled manual watering. Other than routine watering and inspection, there are no additional operations associated with the Project. As a result of the proposed Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program, there would be an increase in the number of street trees from the baseline count of 711,248 to 728,793 and an approximate 0.72 percent net increase of the street tree canopy cover.

WF-1. If located in or near SRAs or lands classified as VHFHSZs, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

This impact would be less than significant during operation.

Operational activities from the Project includes street tree watering and inspection activities. These activities would be performed occasionally, on a small scale and within sidewalk footprints. Therefore, the Project would not hinder or impair any local emergency response or evacuation plan. Moreover, street tree watering and inspection activities do not feature permanent characteristics that could result in impacts on emergency response or evacuation in the area. Impacts would be less than significant.

WF-2. If located in or near SRAs or lands classified as VHFHSZs, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

This impact would be less than significant during operation.

It is possible that street tree watering and inspection activities consistent with the Project would be performed within or adjacent to Selected Wildfire Hazard Areas or VHFHSZ as shown in Figure 3.16-1. Compliance with the existing laws and applicable regulations state in PDF-WF-1 through PDF-WF-4 would that those watering and monitoring the street trees are not exposed to pollutant concentrations from a wildfire. Impacts would be less than significant.

WF-3. If located in or near SRAs or lands classified as VHFHSZs, 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 on the environment?

This impact would be less than significant during operation.

Operational activities from the Project would involve only street tree watering and inspection activities consistent with the Street Tree Retention, Removal and Replacement Policy and may take place in or near state responsibility areas or lands classified as VHFHSZs. Such work does not change the risk of the existing conditions of an area that is classified as a VHFHSZ. Therefore, the Project would not 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 on the environment.

WF-4. If located in or near SRAs or lands classified as VHFHSZs, 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?

This impact would be less than significant during operation.

The Project would not include housing or commercial development. Operational activities from the Project would involve only street tree watering and inspection activities, which would not 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. Existing drainage patterns would be generally maintained or repaired by the Project. Thus, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides resulting from runoff, post-fire slope instability, or drainage changes.

Mitigation Measures

No mitigation measures for operational activities are required.

3.16.5 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts related to wildfire impacts would occur.