

4.18 WILDFIRE

This section describes the existing conditions related to wildfire within the Specific Plan Area and evaluates the potential impacts associated with the proposed Specific Plan, both at the individual project and cumulative levels. The potential project-related impacts related to wildfire were evaluated on a qualitative basis due to the programmatic nature of this EIR. Qualitative impacts were assessed by evaluating the project's potential for impacting wildfire within the Specific Plan Area based on California Department of Forestry and Fire Protection (CAL Fire) maps.

4.18.1 Environmental Setting

Fire protection and emergency medical services within the Specific Plan Area are provided by the Madera City Fire Department, which is administered by the CAL Fire through a cooperative fire protection agreement. Services include fire prevention and suppression, emergency medical assistance, rescue, public assistance, fire menace standby, safety inspections, and review of building plans for compliance with applicable codes and ordinances.

The Fire Department City operates three fire stations: Fire Station 56, located at 317 North Lake Street; Fire Station 57 located at 200 South Schnoor Avenue and Fire Station 58 at 2558 Condor Drive. The Fire Department staffs two fire engines and one mini-pumper. One of the engines features a 50-foot tele-squirt aerial ladder. Fire Station 58 is less than one mile east of the Specific Plan Area. Fire Station 58 is the closest station servicing the Specific Plan Area.

4.18.1.1 Specific Plan Area

The Specific Plan Area is located within the Central Valley and is relatively flat. The majority of the Specific Plan Area is comprised of agricultural lands with single-family residential units interspersed. Similar uses surround the Specific Plan Area to the north, west, and south. The Madera Municipal Airport is located to the west and north of the Specific Plan Area. The Sierra Nevada foothills are located to the east of the Specific Plan Area and provide the nearest areas where large expanses of undeveloped properties occur.

According to the CAL Fire, Fire and Resource Assessment Program (FRAP), the Specific Plan Area does not contain any lands within the State Responsibility Area (SRA) and the Specific Plan Area does not contain any lands classified as Very High Fire Hazard Severity Zone (VHFHSZ) within the Local Responsibility Area (LRA).¹ Some areas along the Fresno Review along the southern boundary of the Specific Plan Area are classified by CAL Fire as Moderate Fire Hazard Severity Zone within the LRA.

¹ California Department of Forestry and Fire Protection. 2007. Fire Hazard Severity Zone Maps, Draft Fire Hazard Severity Zones in LRA – Madera. Website: osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps (accessed March 31, 2020).

4.18.1.2 Regulatory Context

Applicable State and local agencies and programs are briefly summarized below.

State Regulations

Executive Order N-05-19. On January 9, 2019, Governor Gavin Newsom announced an Executive Order (EO) that requires CAL Fire and other State agencies to compile policy and regulatory recommendations concerning wildfire mitigation, emphasizing environmental sustainability and public health. The EO requires the incorporation of socioeconomic analysis when conducting risk management of wildfires and mandates that agencies identify geographic areas with populations that are more vulnerable to the impacts of wildfires.

California Department of Forestry and Fire Protection. CAL Fire publishes maps that predict the threat of fire for each county within the State. Local Responsibility Areas and State or Federal Responsibility Areas are classified as either VHFHSZ or non-VHFHSZ based on factors including fuel availability, topography, fire history, and climate. The 2012 Strategic Fire Plan for California was generated by CAL Fire to provide guidelines and objectives in order to account for associated fire impacts.

California Fire Code. The California Code of Regulations (CCR), Title 24, Part 9, of the California Building Code (CBC) California Fire Code includes regulations for emergency planning, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Several fire safety requirements include: 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 wildlife hazard areas.

California Building Code. The CCR, Title 24, Part 2, of the CBC provides minimum standards for building design in the State. Local codes are permitted to be more restrictive than Title 24, but not less restrictive. The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system height, and seismic zoning. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching and specified in California Occupational Safety and Health Administration (CalOSHA) regulations (CCR, Title 8).

California Health and Safety Code §13000 et seq. and California Building Code. State fire regulations are set forth in Section (§)13000 et seq. of the California Health and Safety Code, which is divided into “Fires and Fire Protection” and “Buildings Used by the Public.” The regulations provide for the enforcement of the CBC and mandate the abatement of fire hazards.

Emergency Response/Evacuation Plans. State law authorizes the Office of Emergency Services (OES) to prepare a Standard Emergency Management System (SEMS) program, which sets forth measures by which a jurisdiction should handle emergency disasters. Noncompliance with SEMS could result in the State withholding disaster relief from the noncomplying jurisdiction in the event of an emergency disaster. The preservation of life, property, and the environment is an inherent responsibility of local, state, and federal government. OES coordinates the responses of

other agencies including the California Highway Patrol (CHP) and the City of Madera Police and Fire departments.

Regional Agencies and Regulations

Madera County Sheriff's Office of Emergency Services. Madera's lead agency for all local emergency response efforts is managed by Madera County's Director of Emergency Services and the Sheriff's Office of Emergency Services (Sheriff's OES)². The Sheriff's OES is responsible for "day-to-day administration of the County's disaster preparedness and response program", "maintaining the County's Emergency Operations Center (EOC)," and "coordinating EOC activities during a disaster." The Sheriff's OES serves as an agent between State, federal, and local agencies involved in emergency response operations.

The Sheriff's OES currently manages the following County emergency plans:

- Emergency Operations Plan (EOP) which outlines how the County will respond to an emergency and sets guidelines to manage a disaster;
- Local Hazard Mitigation Plan (LHMP) which identifies hazards (man-made and natural) within the County, develops mitigation strategies, and is in line with the Disaster Mitigation Act of 2000;
- Community Wildfire Protection Plan (CWPP) helps the community plan how to reduce the risk of wildfire by identifying strategic sites and methods for fuel reduction projects;
- Continuity of Operations Plan (COOP) is an effort within individual executive departments and agencies to ensure that Primary Mission Essential Functions (PMEFs) continue to be performed during a wide range of emergencies, including localized acts of nature, accidents and technological or attack-related emergencies; and
- Mass Fatalities Response Plan serves as a framework for responders faced with the unthinkable mass fatality incident.

Local Policies

Zoning Ordinance. Goals and policies listed in the General Plan are implemented through the City of Madera Zoning Ordinance. Zoning districts are established under the zoning law to guide development and land use in Madera by setting allowable land uses within each district. City zoning ordinances regulate allowable land use, parking, signage and other land use and development specifications enacted under zoning law. The Zoning Ordinance must be consistent with the adopted General Plan. When the City of Madera adopts a General Plan, the City must update the Zoning Ordinance accordingly.

² Madera County. Emergency Info, Madera County Office of Emergency Services. Website: www.maderacounty.com/government/public-health/emergency-info (accessed March 31, 2020).

City of Madera General Plan. The City of Madera General Plan is the City’s primary policy planning document. Through its 10 elements, the General Plan provides the framework for the management and utilization of the City’s physical, economic, and human resources. Each element contains goals, policies, and implementation measures that guide development within the City. The General Plan strives to maintain and improve Madera’s quality of life and implement the community’s shared vision for the future. The General Plan is the official policy statement of the City Council to guide development (both public and private), as well as the City’s operations and decisions. Table 4.18.A lists the General Plan policies related to wildfire.

4.18.2 Impacts and Mitigation Measures

The following section presents a discussion of the impacts related to wildfire that could result from implementation of the proposed Specific Plan. The section begins with the criteria of significance, which establish the thresholds to determine if an impact is significant. The latter part of this section presents the impacts associated with implementation of the proposed Specific Plan and the recommended mitigation measures, if required. Mitigation measures are recommended, as appropriate, to eliminate or reduce significant impacts to a less-than-significant level. Cumulative impacts are also addressed.

4.18.2.1 Significance Criteria

The thresholds for impacts related to wildfire used in this analysis are consistent with Appendix G of the California Environmental Quality Act (CEQA) Guidelines. Development of the proposed Specific Plan would result in a significant impact related to agriculture and forestry resources if it would:

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| Threshold 4.18.1 | Substantially impair an adopted emergency response plan or emergency evacuation plan. |
| Threshold 4.18.2 | 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. |
| Threshold 4.18.3 | 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. |
| Threshold 4.18.4 | 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. |

4.18.2.2 Project Impacts

The following discussion describes the potential impacts related to wildfires that could result from implementation of the proposed Specific Plan.

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| Threshold 4.18.1 | Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? |
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Table 4.18.A: General Plan Policies Related to Wildfire

Policy/Action Item No.	Policy
Policy HS-8	<p>The City shall seek to ensure that new structures are protected from damage caused by earthquakes, geologic conditions, or soil conditions.</p> <p>Action Item HS-8.1: Adopt an All Hazards (natural and manmade) Disaster Plan. The Plan should be sufficiently broad in scope to include the designation of evacuation routes, staging areas, shelters, PODs (points of distribution), and protocols for coordinating all local government and volunteer agencies in assisting local residents in the event of a major earthquake, largescale fire or explosion, or hazardous chemical spill or release of hazardous airborne gas.</p>
Policy HS-11	<p>The City will work with responsible agencies to ensure that all industrial facilities are constructed and operated in accordance with the most current safety and environmental protection standards.</p>
Policy LU-35	<p>Figure LU-3 depicts the Village and District areas as defined by the City of Madera. This map shall be used to implement other policies in this General Plan which refer to villages and village centers. Although shown as defined lines, the exact boundaries of a village may be adjusted at the City's discretion to reflect conditions on the ground, ownership boundaries, or other conditions. Such a change shall not be considered an amendment to this General Plan.</p> <p>VILLAGE D: SPECIFIC POLICIES</p> <p>The following policies are intended to identify some of the unique issues for this area which will need to be addressed, and to guide development, as the area transitions to urban use.</p> <ul style="list-style-type: none"> • All future development in this Village shall conform to the Building Blocks principles as described in this General Plan. • In conjunction with village and neighborhood planning, a mechanism shall be established which creates a permanent agricultural buffer where the westerly edge of the Village abuts the Growth Boundary. This buffer shall average at least 400' in depth, with a minimum depth of 250', and must run continuously along westerly edge of the Village. No habitable structures are to be located within this buffer, although passive recreational opportunities (such as trails and community gardens) may be allowed. Alternative methods and designs to establish the buffer may be proposed, and including placing the buffer on either side of the Growth Boundary. Physical maintenance of the buffer shall be provided consistent with the design and function of the space. • The Village core area shall provide for an integrated mix of uses, including park and open space uses, along the river. • Future development along the Fresno River should be designed to take advantage of the river frontage, including orienting development to front the river where not otherwise prohibited by site conditions. • Village and neighborhood planning shall provide for the alignment of the designated arterial which runs through the Village east and west (Cleveland Avenue), to bend to the south to provide circulation to the proposed village core located along the Fresno River. • All development proposals within Village D shall comply with the provisions of the Airport Land Use Master Plan. The establishment of land use designations at the village and neighborhood levels, as well as the layouts of individual projects, shall reflect the allowable uses and densities in the Airport Land Use Master Plan.
Policy HS-33	<p>The City shall ensure the safety and protection of Madera and its community members by providing adequate first response capabilities to emergencies and by maintaining sufficient resources to expand protection as the community grows.</p>
Policy HS-34	<p>The City shall continue to maintain and update emergency service plans, including the Madera City Fire Department Emergency Operations Plan and the Hazardous Material Spills Emergency Response Plan.</p>
Policy HS-35	<p>The City shall ensure the safety and protection of Madera and its community members by providing appropriate first response to emergencies and ensure that sufficient resources are available to expand protection as the community grows.</p>
Policy HS-36	<p>The City will maintain and enhance community safety through coordinated regional emergency, law-enforcement and protective services systems.</p>

Source: City of Madera General Plan (October 2009).

Implementation of the proposed Specific Plan would alter the land use pattern in the Specific Plan Area and would add additional vehicle traffic and residences requiring evacuation in case of an emergency. Implementation of the proposed Specific Plan would not conflict with the City's emergency response and/or evacuation plans because major arterial roads adjacent to the Specific Plan Area (Road 23, Avenue 15 ½, Avenue 16, and Avenue 17) would be improved to support the Plan Area. In addition, new roadways constructed within the Specific Plan Area would provide roadway connectivity, allowing for better emergency vehicle access to residences as well as evacuation routes for area residents. Finally, the proposed Specific Plan would be reviewed by the Madera City Fire Department in order to ensure compliance with all emergency evacuation plans. As a result, a less-than-significant impact would occur.

Level of Significance Without Mitigation: Less than significant. No mitigation is required.

Threshold 4.18.2 **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?**

According to CAL Fire, the Specific Plan Area does not contain any lands within the SRA or lands classified as VHFHSZ within the LRA.³ Although the proposed Specific Plan would change the types of land uses within the Specific Plan Area from agriculture to primarily residential and commercial uses, given the low risk of wildfires in the vicinity of the Specific Plan Area due to the presence of existing agriculture and urban uses adjacent to the project site, this change in land uses would not exacerbate existing wildfire risks. Therefore, implementation of the proposed Specific Plan would not exacerbate wildfire risks due to slope, prevailing winds, or other factors. Furthermore, implementation of the General Plan policies listed above in Table 4.18.A would ensure potential impacts from wildfire would remain less than significant. Therefore, impacts associated with the exacerbation of wildfire risks, including exposure of residents residing within the Specific Plan Area to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, would be less than significant.

Level of Significance Without Mitigation: Less than significant. No mitigation is required.

Threshold 4.18.3 **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?**

³ California Department of Forestry and Fire Protection. 2007. Fire Hazard Severity Zone Maps, Draft Fire Hazard Severity Zones in LRA – Madera. Website: osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps (accessed March 31, 2020).

According to CAL Fire, the Specific Plan Area does not contain any lands within the SRA or lands classified as VHFHSZ within the LRA.⁴ Implementation of the proposed Specific Plan would result in the installation of new infrastructure such as roads, power lines and other utilities. However, because the Specific Plan Area is not in a high fire hazard zone, implementation of the proposed Specific Plan would not exacerbate fire risk or result in ongoing impacts to the environment that would increase fire risk. Further, the required infrastructure would not be located within a high fire hazard area and fire risk would therefore not be exacerbated. As a result, impacts related to installation or maintenance of associated infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment, therefore a less than significant impact would occur.

Level of Significance Without Mitigation: Less than significant. No mitigation is required.

Threshold 4.18.4 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?

According to CAL Fire, the Specific Plan Area does not contain any lands within the SRA or lands classified as VHFHSZ within the LRA.⁵ In addition to the low fire risk, the topography of the proposed Specific Plan is relatively flat. In addition, grading for development to occur under the proposed Specific Plan would be in accordance with the City of Madera Grading Ordinance, the current building code, and any recommendations provided in the Infrastructure Master Plan to ensure that drainage within the Specific Plan Area meets the requirements of the City of Madera. As a result, implementation of the proposed Specific Plan would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes, and a less-than-significant impact would occur.

Level of Significance Without Mitigation: Less than significant. No mitigation is required.

4.18.2.3 Cumulative Impacts

The proposed Specific Plan would have a significant effect on the environment if it – in combination with other projects – would contribute to a significant cumulative impact related to wildfire. The cumulative study area for wildfire impacts includes the Specific Plan Area and immediately adjacent lands.

Implementation of the proposed Specific Plan would result in an increase in population in the Specific Plan Area. In addition, installation of new infrastructure would be required to implement the Specific Plan. However, the Specific Plan Area is not located within a VHFHSZ within the LRA and therefore wildfire risk is considered low. Further, none of the immediately adjacent lands are within a VHFHSZ. In addition, implementation of the proposed Specific Plan would not alter existing roadways or accesses in a way that would substantially impair an emergency evacuation plan or the

⁴ California Department of Forestry and Fire Protection. 2007. Fire Hazard Severity Zone Maps, Draft Fire Hazard Severity Zones in LRA – Madera. Website: osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps (accessed March 31, 2020).

⁵ Ibid.

LHMP. Since the Specific Plan Area and surrounding areas do not contain any lands classified as VHFHSZ, and because no potentially significant impacts related to wildfires have been identified, wildfire impacts would be less than cumulatively significant.

Level of Significance Without Mitigation: Less than significant. No mitigation is required.