

4.6 HAZARDS - WILDFIRE

This section analyzes wildfire hazards for the proposed *Parks Master Plan 2030* (Project) based on existing City plans and studies.

Public and agency comments were received during the public scoping period in response to the Notice of Preparation (NOP). No comments were received regarding wildfire hazards. Public comments received during the public scoping period are included in Appendix A.

4.6.1 Environmental Setting

Regulatory Setting

The Federal Disaster Mitigation Act (DMA) of 2000 (Public Law 106-390), adopted by Congress in October 2000, requires state and local governments to develop hazard mitigation plans as a condition for federal grant assistance. The City of Santa Cruz adopted its “Local Hazard Mitigation Plan” in September 2007. The detailed five-year plan identifies potential natural and man-made hazards, assesses their likely risk, and includes mitigation methods to reduce risks. The potential hazards identified in the plan include wildfires. Mitigation measures proposed to address these risks generally include prioritized actions that include hazard event planning, emergency preparedness coordination and education, facility upgrades, monitoring actions and other actions in response to specific hazards. The mitigation plan will be reviewed and updated every five years.

The Uniform Fire Code published by the International Fire Code Institute and the Uniform Building Code (adopted in California as the California Building Standards Code) published by the International Conference of Building Officials both prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection. Amendments to the California Building Standards effective in 2008 increased the requirements for defensible space and require more fire-resistant building materials and design than prior codes in areas identified as having severe fire hazards.

City Wildfire Hazards

Fire Hazard Severity Zone Maps

The City of Santa Cruz State Responsible Areas (SRA) have been evaluated in Cal Fire’s Hazard Severity Zone Map. The city is surrounded by Moderate and High SRA Fire Hazard Safety Zones. The area within the City, however, is incorporated in the mapping system as a Local Responsibility Area (California Department of Forestry and Fire Protection, 2007b).

The City of Santa Cruz Local Responsibility Areas (LRA) have also been evaluated in Cal Fire’s Hazard Severity Zone Map. DeLaveaga Park, DeLaveaga Golf Course, Pogonip Open Space, Moore Creek, and Natural Bridges State Park are designated LRA Moderate Fire Hazard Safety Zones. Arroyo Seco

Canyon and the southwest portion of DeLaveaga Park are designated LRA High Fire Hazard Severity Zones (California Department of Forestry and Fire Protection, 2007a).

According to maps developed as part of the City's recently adopted *General Plan 2030* and included in the General Plan EIR and General Plan, all of the City's open space areas are located in extreme or high fire hazard areas (City of Santa Cruz, April 2012, DEIR volume). Other City parks are generally in developed areas and not located within mapped wildland fire hazard areas. The City of Santa Cruz has initiated a number of wildfire mitigation programs in the past at City greenbelt lands, including the DeLaveaga Vegetation Management Program. The City also continues to maintain and develop cooperative agreements with the County, UCSC, the California Department of Forestry, and other fire protection agencies to collaboratively avoid or minimize the threat from wildland/urban interface fires (Ibid.).

City Wildfire Hazard Assessments and Vulnerability

The City has identified potential wildland fire hazards, including a description of the type, location, and extent of all natural hazards that can affect the jurisdiction as part of its Local Hazard Mitigation Plan (LHMP) (2007-2012) and Five Year Update Plan (2012-2017). A second Five Year update plan (2017-2022) was undertaken to incorporate much of the prior LHMP versions, in addition to any new identified risks, update hazards/risks, and revisions to any necessary documents. The LHMP represents the City's commitment to reduce risks from natural and other hazards and serves as a basis for the California Office of Emergency Services to provide technical assistance and to prioritize project funding as pursuant to the Code of Federal Regulations [CFR] §201.6.

The LHMP defines wildland fire as any unwanted fire involving outdoor vegetation, which may include forest, rangeland, crop fields, vacant lots, highway medians, parks and golf courses. Life hazards and potential economic losses in wildland areas have increased greatly, and the increase in human activity has multiplied the number and variety of potential sources of ignition.

The City of Santa Cruz has five wildland/urban interface areas including three areas designated as mutual threat zones. Mutual threat zones are defined as geographical areas where a wildfire would threaten property within the Santa Cruz protection district as well as property covered by another fire protection service. Mutual threat zones areas in and around DeLaveaga Park, Pogonip, and the Arroyo Seco/Meder Canyon area have been identified as non-State Responsibility Areas (SRA) in which any fire is considered a threat to adjacent State Responsibility Areas. These geographical areas are designated mutual threat zones because of the urban development that has occurred along their canyons and the vegetation that is considered significant. Open space areas and adjacent property within Santa Cruz County are at risk of wildland fires. Additional areas of concern for these wildland/urban interface zones include the Arana Gulch property, Lighthouse Field, the Moore Creek Preserve as well as other smaller wildland/Urban Interface areas through the city.

The City is at risk of wildland fires because of topography and vegetation that is found in and around the City. Some canyon areas have steep slopes with dense strands of eucalyptus trees, conifers,

chaparral species and other vegetation, which may increase the potential for fires with the intensity that may threaten a large number of homes located around the canyon and the top of steep slopes. A fire in these canyons would be expected to spread rapidly. Without fuel modification and/or management, eucalyptus litter, shrubs, and un-mowed grass would generate enough heat to cause shrubs, eucalyptus, or oak canopies to ignite, distributing embers widely and producing enough heat to potentially involve structures. Un-mowed grass and eucalyptus litter comprise the highest flash point type of fuels encountered in Santa Cruz. Additionally, trees with low branches and shrubs are most likely to serve as ladder fuel to enable fires beneath to spread into the tree canopy or crown, in which event embers may be expected to be cast through the neighborhood and potentially cause several additional fires.

The marine influence provides a high moisture content in most of the wildland fire risk areas. Winds tends to blow from the ocean upslope. However, in the fall, “sundown winds”, defined as strong, warming, downslope winds that develop over the southern slopes of mountains in late afternoons and evenings can occur north/northeast towards the ocean, posing a very serious threat during the height of fire season,. The wind speeds may exceed 20 mph and the temperate may exceed 80°F.

The City has included a risk assessment in the LHMP that includes a description of the jurisdiction’s vulnerability to the wildfire hazards and the impacts that each hazard would have on the community. Although the majority of Santa Cruz City is urban, it is surrounded by a greenbelt. As indicated above, the park areas most susceptible to wildfires within the City are: Pogonip, DeLaveaga Park, Moore Creek Preserve, Arana Gulch, and Arroyo Seco Canyon. The vulnerability of these areas is primarily due to limited access and transient use. A wildfire could have a devastating impact on the community. The majority of wildland fire areas are in proximity to residential or open space areas. Critical facilities have been identified within wildfire hazard areas and include the historic Pogonip Clubhouse, DeLaveaga Golf Course and associated buildings, and some park structures.

City of Santa Cruz Wildfire Hazard Mitigation Goals

The City’s LHMP considers mitigation options to help reduce the vulnerability of wildfire damage. Wildland/urban interface fires have been recognized as a threat to the City of Santa Cruz in the past. Climate change impacts through changing precipitation patterns (shorter more severe winters and longer, dryer summers) are expected to exacerbate this wildfire threat; rising temperatures may also contribute to increased wildfires (City of Santa Cruz, 2013). As housing development increases, there is an associated increased risk in the urban rural interface. In addition, the City does not have the resources to adequately police and protect open space area. This inadequate policing increases the frequency of illegal camping, which can result in fires in limited access and canyon areas.

The mitigation strategies provided in the LHMP serve as a potential blueprint for losses identified in the risk assessment. The primary mitigation strategy is vegetation management. Vegetation management within the City of Santa Cruz include vacant lots, streets, islands, alleys, and greenbelt areas. Some practices may include frequent mowing and abatement of vegetation in these areas, and these activities continue on an annual basis. The City continues to maintain and develop collaborative

agreements to avoid or minimize the threat from wildland/urban interface fires. Some of the agencies include Santa Cruz County, UCSC, the California Department of Forestry and other fire protection agencies. Furthermore, building partnerships with other City departments, particularly Parks and Recreation and Police, in patrolling wildland areas, is critical to mitigation efforts when staff resources are limited.

The mitigation strategies include a comprehensive range of specific mitigation actions to be considered to reduce the effects of each hazard as follows:

- Cooperative fire protection agreements with other agencies
- Reductions of fire risk in wildland/urban interface areas through improved vegetation management and appropriate code enforcement
- Promotion of built-in fire extinguishing and warning fire alarm systems
- Creation of practice (not reactive) hazard abatement program
- Land use planning to reduce incidence of human caused wildfire
- Adequate staffing to meet needs of City population and development
- Fire prevention programs in schools, institutions, and commercial buildings

4.6.2 Impacts and Mitigation Measures

Thresholds of Significance

In accordance with CEQA; State CEQA Guidelines (including Appendix G); City of Santa Cruz plans, policies, and/or guidelines; and agency and professional standards; a project impact would be considered significant if the project would:

- | | |
|-------|---|
| HAZ-1 | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; |
| HAZ-2 | Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires; or |
| HAZ-3 | <p>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones,</p> <ul style="list-style-type: none"> • Substantially impair an adopted emergency response plan or emergency evacuation plan; • 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; • 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; or

- 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.

Impacts and Mitigation Measures

Areas of No Project Impact

HAZ-1 *Emergency Response.* The City of Santa Cruz has an Emergency Operations Plan (EOP) that details the City’s concept of operations in response to disasters. The EOP outlines how information and resources are coordinated for disasters or threat of disasters. The City of Santa Cruz Emergency Operations Center Manager endeavors to conduct annual trainings, tabletop exercises, and other drills that support the preparedness and response capabilities of city staff and the readiness of the Emergency Operations Center. Information updates and tabletop discussions are conducted to clarify staff roles and responsibilities in the EOC, in the Department Operations Centers (DOCs), and in the field to help protect people and property (City of Santa Cruz, April 2012, DEIR volume).

The proposed Parks Master Plan does not include a change to the existing circulation pattern within the City, although new bicycle and pedestrian facilities may be added in the future. Implementation of the Parks Master Plan improvements and projects would not physically interfere with emergency response or evacuation routes. The project will not significantly impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and there would be *no impact*.

HAZ-3 *Wildland Fire Hazard.* The City of Santa Cruz is surrounded by Moderate and High State Responsibility Area, is incorporated in the mapping system as a Local Responsibility Area. Several open space areas are identified as Moderate and High Fire Hazard zones, including DeLaveaga Park and Golf Course, Pogonip, Moore Creek, and Arroyo Seco. Existing recreational structures (Pogonip and DeLaveaga Golf Course clubhouses) are proposed for renovation or reconstruction for the golf course clubhouse, the proposed Parks Master Plan would not directly or indirectly result in new residential development and would not expose occupants to pollutant concentrations from a wildlife. None of the recommendations included in the Master Plan for the City’s open space lands would result in impairment of an adopted emergency response plan as discussed in HAZ-1 above, would not require installation of infrastructure that could exacerbate a fire, or expose people to significant risks. Therefore, there would be *no impact*.

Impact HAZ-2: Exposure to Wildland Fire Hazard. The proposed Project would not expose people or structures to wildland fires. Therefore, this is a *less-than-significant* impact.

Most recommended improvements included in the Parks Master Plan are for minor improvements or addition of amenities to existing parks and facilities within developed areas. No significant structural improvements or park expansion is proposed. New structural development recommendations include:

- Potential restrooms at a few neighborhood parks within developed areas (Sgt. Derby Park, University Terrace Park, and Westlake Park) and restroom renovation at DeLaveaga Park;
- Permanent restroom and dressing room facilities the Audrey Stanley Grove amphitheater at DeLaveaga Park¹;
- Potential addition of a caretaker residence at Pogonip;
- Potential workshop and storage structure at the Wharf Yard (at Depot Park); and
- Structural renovations at the Civic Auditorium, Loudon Nelson Community Center, and Pogonip clubhouse, as well as construction of a new DeLaveaga Golf Course clubhouse.²

Construction of parks and recreational facilities would not create habitable structures, e.g., residential structures, and would not expose people to a significant risk related to injury or damage or create a new risk of fire. The Project could result in additional use at some facilities, and in particular at the Audrey Stanley Grove outdoor amphitheater in DeLaveaga Park with potential expanded use. However, continued implementation of fire prevention measures that have been undertaken throughout the City as set forth in the City's Local Hazard Mitigation Plan would minimize risks. Therefore, impacts resulting from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including wildlands adjacent to urbanized areas or when residences are intermixed with wildlands, are considered *less than significant*.

Mitigation Measures

No mitigation measures are required as a significant impact has not been identified.

¹An application for a Design Permit to construct a 5,500 square foot multi-purpose building to replace existing trailer at the amphitheater has been submitted to the City's Planning and Community Development Department.

² While a new clubhouse is identified in the 2002 Golf Course Master Plan, it is noted that the existing clubhouse is undergoing substantial renovations, and a new clubhouse is not envisioned during the timeframe of the Parks Master Plan.