

## 4.8 Fire Hazards and Emergency Services

This section describes effects on wildfire prevention and suppression (including effects on surface fuels) within the general Project area (unincorporated Santa Barbara County and City of Lompoc lands) that could be caused by implementation of the Project. The following discussion addresses existing environmental conditions in the affected area, identifies and analyzes potential environmental effects of the Project, and recommends measures to reduce or avoid significant adverse impacts anticipated from Project implementation. Existing laws and regulations relevant to wildfire prevention and suppression are also described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain adverse effects that might otherwise occur with the implementation of the Project. The greater SWEP area is evaluated based on its potential to be affected by actions related to the proposed Project, including construction.

This section also addresses potential Project effects related to fire and police protection and other emergency services, including paramedic services. This section supplements the analysis presented in the LWEP EIR, Chapter 3.8, *Fire Hazards and Emergency Services*. Similar to LWEP, the SWEP would not result in increased population as discussed in Section 6.4, *Growth-Inducing Impacts*, and Section 6.5, *Effects Found Not to Be Significant*. Therefore, population-based impacts on service ratios for fire and emergency services would not occur and, therefore, such impacts are not discussed in this section. This section focuses on impacts to fire and emergency services that could result during construction and operation of the Project.

### 4.8.1 Environmental Setting

#### Fire Hazards

##### *Climate*

The presence of dense, dry fuels and a warm, arid climate characterizes southern California as having one of the most fire-prone landscapes in the world. Factors influencing wildfire behavior and magnitude include forest structure, fuel conditions, climate, and the source of ignition. Weather is one of the most significant biophysical factors of wildfire behavior. The summer months of southern California are arid and warm, with very little precipitation. Drought and Santa Ana Occurrences (SAOs) are native weather conditions to southern California that drive catastrophic wildfires. SAOs are seasonal weather events that typically occur during autumn months (September to December) when cool air rises from the ocean, creating high off-shore winds that mix with hot, dry air from arid inland areas. High pressure builds in inland areas and forms a strong pressure gradient with low pressure in the coastal ranges, creating winds exceeding 60 miles per hour that blow into the valleys.

Santa Barbara County has a semi-arid Mediterranean climate, characterized by warm dry summers and mild winters. Sunny skies are common throughout most of the area, although seasonal low clouds and fog occur with some frequency over the Pacific Ocean and in the immediate coastline. Mild temperatures occur throughout the year, particularly near the coastline. Considerably more temperature variation occurs in the inland valleys and mountainous areas. Maximum readings in summer average about 80°F near the coast (SBC 2018).

## Vegetative Fuel Conditions

According to the Santa Barbara County Unit Strategic Fire Plan (SBC 2018), chaparral provides the most widespread wildland fuel threat in Santa Barbara County. It can be found on the slopes of the Santa Ynez Mountains, throughout the Sierra Madre, and San Rafael mountains, and locally in northern Santa Barbara County in the Casmalia, Soloman, Purisima, and Santa Rosa Hills, and in the Lompoc and Tranquillion Peak areas of Vandenberg Air Force Base. These vegetation communities are characterized by woody brush and shrubs of chamise, ceanothus and manzanita, which dominate dry rocky slopes and provide erosion control and watershed protection. Numerous grasslands and fields are found in the County and present the potential for fast moving wildland fires that can transition into heavier fuel beds and tree canopies (SBC 2018).

Santa Barbara County has 791,934 acres of State Responsibility Area (SRA), the bulk of which is covered with fire-prone vegetation. A SRA is an area where the State of California has the primary financial responsibility for the prevention and suppression of wildfires. CAL FIRE (California Department of Forestry and Fire Protection) is responsible for providing a basic level of wildfire prevention and protection within SRAs (CAL FIRE 2018). These large areas of fire-prone vegetation are commonly referred to as “fuel beds” and are often large in size due to steep topography and lack of roads or natural barriers. The average slope in the wildland areas of Santa Barbara County is 40 percent (SBC 2018).

The entire SWEP site is mapped as a SRA. Public Resources Code 4201-4204 directs CAL FIRE to map fire hazards within SRA, based on relevant factors such as fuels, terrain, and weather. These statutes were passed in 1982 in response to the 1980 Panorama Fire in San Bernardino, which was a significant wildland-urban interface fire. In 2007, the entire SWEP site was designated a Very High Fire Severity Zone (VHFSZ). In designating the area as a VHFSZ, CAL FIRE considered multiple parameters including wildland fuels, regional topography, weather, crown fire potential, and ember production potential.

## Previous Wildfires and Fuels Maintenance

The modern fire history of Santa Barbara County extends back to 1955 when the Santa Barbara County Fire Department first started keeping records for this area. Over the last 12 years, Santa Barbara County experienced 12 major fires, detailed below in Table 4.8-1. Since the preparation of the LWEP EIR, Santa Barbara County has experienced at least 11 major wildfires, and the severity and frequency of California wildfires is increasing. There is a growing body of evidence and scientific opinion that supports a link between warmer temperatures due to climate change and more wildfires of greater intensity that occur for more months out of the year. Recent peer-reviewed studies (such as Abatzoglou and Williams, 2016) have noted that numerous factors aided the recent rise in fire activity, observed warming and drying have significantly increased fire-season fuel aridity, fostering a more favorable fire environment across forested systems. In particular, Abatzoglou and Williams (2016) links human-caused climate change to over half of the documented increases in fuel aridity since the 1970s and the doubling of the cumulative forest fire area since 1984. Studies suggest that anthropogenic climate change will continue to chronically enhance the potential for western U.S. forest fire activity when fuels are not limiting.

**Table 4.8-1. Major Wildfires in Santa Barbara County 2007-2017**

Fire	Date	Cause	Acres Burned	Structures Damaged or Destroyed	Deaths
Thomas	December-2017	Under Investigation	281,893*	1063*	2**
Whittier	July-2017	Under Investigation	18,430	53	0
Alamo	July-2017	Under Investigation	28,687	15	0
Canyon	August-2016	Under Investigation	12,518	1	1
Rey	September-2016	Under Investigation	33,606	0	0
Sherpa	June-2016	Miscellaneous	7,474	1	0
White	May-2013	Miscellaneous	1,984	0	0
La Brea	August-2009	Miscellaneous	91,622	1	0
Jesusita	May-2009	Equipment Use	8,733	80	0
Tea	November-2009	Campfire	1,940	210	0
Gap	July-2008	Miscellaneous	9,443	4	0
Zaca	July-2007	Equipment Use	240,207	1	0

Source: SBC 2018

\*Started in Ventura County with majority of acres and structure loss in Ventura County

\*\*20 civilian deaths and 2 missing persons from resulting debris flow

## Fire and Ambulance Services

### Departments and Stations

#### *County of Santa Barbara Fire Department*

The Santa Barbara County Fire Department (SBCFD) is responsible for providing fire protection and emergency medical services to the Project site. Similar to the LWEP, Station No. 51 is the SBCFD fire station nearest to the Project, located approximately 7.2 miles north of the western edge of the Project site at 3500 Harris Grade Road within the City of Lompoc. This fire station was moved in October 2008, after the LWEP EIR was published. Station 51 was previously located at 749 Burton Mesa Boulevard and was moved 0.4 miles to its current location. Since LWEP, Station No. 51 has increased its staffing and equipment quantities. SBCFD Station No. 51 has the following fire-fighting and emergency equipment and personnel: one engine, one reserve engine, one captain, one engineer, one firefighter, and two firefighters/ paramedics. The station includes one Type 1 engine, a rescue ambulance, a Type 3 engine, and a Type 1 Reserve Engine. Engine 51's response area includes the Project site; however, Rescue Ambulance 51's response area roughly ends at the southern limit of the City of Lompoc, north of the Project area. However, Rescue Ambulance 51 will respond to all areas when American Medical Response is not available (SBCFD 2018).

In addition to its fire stations, the SBCFD maintains mutual aid agreements with the City of Lompoc Fire Department and the Vandenburg Air Force Base Fire Department. These agreements enable the fire departments to share resources and respond to emergencies in a timely manner. Similar to LWEP, the SBCFD would be designated as the first responder for all Project-related incidents in unincorporated areas. Emergency calls would be directed to SBCFD, but may also be routed to VAFB or the City of Lompoc depending on the location and severity of the incident; either one of these agencies could be first on the scene.

The Santa Barbara County General Plan outlines the evacuation planning process in the event of a fire hazard. In the event of a fire hazard within the Local Responsibility Area (LRA), the SBCFD would assess the hazard areas, identify the evacuation requirements and, if necessary, order the evacuation. During an evacuation, law enforcement agencies (such as Santa Barbara County Sheriff's Department [SBCSD], California Highway Patrol [CHP], and Lompoc Police Department [LPD]) are responsible for implementing the emergency evacuation. The public safety agencies involved would comply with a Unified Command protocol when determining the appropriate evacuation routes.

As detailed in the Santa Barbara County General Plan (SBC 2015), County safety agencies maintain emergency response protocols which contain criteria and guidelines for the declaration, communication, and implementation of evacuation orders or warnings. The County maintains protocols designed to assure that during an evacuation: routes remain clear, traffic moves smoothly, routes/ areas are isolated as appropriate, and the risk of accidents on roadways is minimized.

In addition to agency protocols, Santa Barbara County employs a reverse 9-1-1 system to notify the public of the need to evacuate a specific area. In the event of an evacuation or emergency near Vandenburg Air Force Base, a Memorandum of Agreement (MOA) is in place between the County, VAFB, and City of Lompoc for use of a dedicated base telephone and radio communication system.

In the event of a large-scale fire or major disaster, the Santa Barbara County Office of Emergency Services (SBC OES) is responsible for implementing the Santa Barbara County Operational Area Multi-Hazard Functional Plan (MHFP). This outlines protocols for emergency planning, management, and response for the County operational area.

### ***City of Lompoc***

The City of Lompoc Fire Department (LFD) provides fire protection services within City limits, but the SBCFD also responds to all structure fires. The LFD also responds to incidents outside of the City limits, if requested by the SBCFD. Two LFD fire stations are located within the City, at 115 South G Street (Station No. 1) and 1100 North D Street (Station No. 2). Station No. 1 is closest to the Project site (approximately 5 miles north of the edge of the Project) and would likely be the first responder to an incident, although the SBCFD would also respond. Fire Station No. 1 includes the following equipment and personnel: one engine, aerial ladder truck in reserve, four personnel, and one chief, although the staffing fluctuates with three or four personnel on duty one engine with three firefighters, one rescue with two firefighters, Battalion Chief's command vehicle with one Chief Officer, a ladder truck in reserve, and one Type 3 Brush Truck for wildland fire response.

The LFD responds to all Emergency Medical Service (EMS) calls within the City; fire response personnel are cross-trained to Emergency Medical Technician (EMT) and EMT expanded scope levels. In addition to LFD staff, a private ambulance company (American Medical Response [AMR]) assists the LFD with emergency paramedic services and provides patient transport.

### **Response Times**

**Santa Barbara County Fire Department.** Response time refers to the time needed for a unit to arrive at the scene and set up the initial equipment. Response times are discussed in the LWEP Final EIR, Section 3.8.1.2. The Santa Barbara County Fire Department response times have not changed since the publication of the LWEP EIR. In general, the response time would be longer in the farther reaches of the SWEP site, and would be shorter along the transmission line corridor.

**City of Lompoc Fire Department.** During preparation of the LWEP EIR, the LFD had a goal of a 5-minute response time within the city limits. Currently, the LFD has a goal of arriving within four minutes from receipt of the call at the dispatch center, 90 percent of the time (G. Kuras, Personnel Communication, 12/4/18). Within the City of Lompoc, the LFD provides EMS through its firefighters, who are cross-trained as emergency medical technicians. The LFD is responsible for responding to all medical emergencies within City limits, and ambulatory services are provided by AMR. The estimated response time to the nearest portion of the Project site is estimated to be approximately 10 minutes for fire services. Response time to the more distant portions of the proposed Project would be longer, and the response time to the transmission line would be shorter.

## Police Services

The SWEP area historically has had a relatively low level of calls for service. The primary service calls are alcohol and drug-related calls in the area of Miguelito County Park and infrequent calls related to trespassing on the local ranches.

## Departments and Stations

**Santa Barbara County Sheriff's Department.** The Santa Barbara County Sheriff's Department (SBCSD) jurisdiction has not changed since LWEP. There have been staffing changes at SBCSD since the LWEP: approximately 260 sworn deputy sheriffs (a reduction of 40 since LWEP), 200 sworn corrections officers (an increase of 25), 140 civilian employees (a decrease of 60), and 150 volunteers (an increase of 150) (SBCSD 2018). Since LWEP, the SBCSD now maintains formalized mutual aid agreements with other law enforcement agencies including VAFD, and it may rely on other agencies to assist in responding to a call as needed. For major public disasters, the process is the same as described in LWEP. The closest station to the Project site has changed slightly since LWEP. It will now be served by the SBCSD Lompoc Station located at 3500 Harris Grade Road, collocated with the SBCFD Station No. 51. The station is located approximately 7.2 miles north of the SWEP and includes the following equipment and personnel: four black and white units including a four-wheel drive truck with EMS capabilities, approximately 10 law enforcement personnel including eight patrol deputies.

**City of Lompoc Police Department.** The City of Lompoc Police Department is located at the same location as described in LWEP (107 Civic Center Plaza) and has 37 sworn officers and 11 vehicles, the same personnel and equipment available to service the proposed Project.

## Response Times

No response times have been established for rural areas.

### 4.8.2 Regulatory Setting

The regulatory setting for the proposed Project was described in the LWEP EIR. The relevant plans from the LWEP have been summarized below. Please see the LWEP EIR, Section 3.8.2, *Regulatory Framework*, for more detailed information.

## **LWEP Regulatory Summary**

### **Federal**

National Fire Protection Agency (NFPA) provided codes and standards, including the National Electric Code [NEC]. See Section 3.8.2 of the LWEP EIR.

### **State**

Relevant portions of the California Fire Code (CFC). See Section 3.8.2 of the LWEP EIR.

### **Local**

A Fire Protection Certificate would be required by the SBCFD. See Section 3.8.2 of the LWEP EIR.

## **SWEP Regulatory Setting**

In addition to the regulations discussed above and considered as part of the LWEP EIR, the following additional regulations, plans, and policies would be applicable to the SWEP.

### **State**

#### ***Public Resource Code 4291***

Requires all structures on SRA lands to maintain 100 feet of defensible space from each side and from the front and rear of the structure. Within the County of Santa Barbara, 100 feet of defensible space is also enforced on LRA in the SBCFD district. The 100-foot defensible space clearance is a minimum, and in some instances this distance may need to be increased due to the location a structure on a slope or because the vegetative fuel loading surrounding a structure.

#### ***General Order 95: Utility Vegetation Management Requirements***

Contains specific rules intended primarily to ensure safe construction, maintenance, operation, or use of overhead electrical lines. Utilities are required to maintain minimum vegetation clearance between vegetation and high-voltage power lines at all times for public safety and electric system reliability.

#### ***California Department of Forestry and Fire Protection (CAL FIRE)***

CAL FIRE is responsible for reducing wildfire-related impacts and enhancing California's resources, and responds to all types of emergencies including wildland fires and residential/commercial structure fires. CAL FIRE is the responsible agency for enforcing California fire safety codes included in the California Code of Regulations and California Public Resources Codes.

#### **California Code of Regulations, Title 14**

- Section 1250: Provides specific exemptions from: electric pole and tower firebreak clearance standards, electric conductor clearance standards, and to specify when and where the standards apply. Note: The Director of CAL FIRE makes regulations that apply in State Responsibility Areas (SRA) on mountainous, forest-covered, brush-covered, or grass-covered lands.
- Section 1255: This code provides exceptions concerning some installed hardware and ground cover.

### **California Public Resource Codes**

- Code 4119: Authorizes agencies to inspect all properties, except a dwelling's interior, to ascertain compliance with state forest and fire laws, regulations, or use permits.
- Code 4291: Requires defensible space around all structures and is the primary mechanism for conducting fire prevention activities on private property within CAL FIRE jurisdiction.
- Code 4292: Utilities are required to maintain firebreaks around poles located in wildland areas that have equipment with the potential to emit sparks when operating properly.
- Code 4293: Utilities are required to maintain clearance between vegetation and high voltage power lines in wildland areas to prevent wildfires. It also requires removal of dead, diseased or dying trees that could fall into power lines.
- Code 4294: A clearing to obtain line clearance is not required if self-supporting aerial cable is used. Forked trees, leaning trees, and any other growth that may fall across the line and break it shall be removed.
- Code 4295: A person is not required by Section 4292 or 4293 to maintain any clearing on any land if such person does not have the legal right to maintain such clearing, nor do such sections require any person to enter upon or to damage property which is owned by any other person without the consent of the owner of the property.
- Code 4435: If any fire originates from the operation or use of any engine, machine, barbecue, incinerator, railroad rolling stock, chimney or other device which may kindle a fire, the occurrence of the fire is prima facie evidence of negligence in the maintenance, operation, or use of such engine, machine, barbecue, incinerator, railroad rolling stock, chimney, or other device. If such fire escapes from the place where it originated, and it can be determined which person's negligence caused such a fire, such person is guilty of a misdemeanor.

### **California Government Codes**

- Code 51175 Very High Fire Hazard Severity Zones: This code defines Very High Fire Hazard Severity Zones and designates lands considered by the State to be a very high fire hazard.
- Code 51189 WUI Building Standards: This code directs the Office of the State Fire Marshal to create building standards for wildland fire resistance. The code includes measures that increase the likelihood of a structure withstanding intrusion by fire (such as building design and construction requirements that use fire-resistant building materials) and provides protection of structure projections (such as porches, decks, balconies, and eaves), and structure openings (such as attics, eave vents, and windows).

## **Local**

### **County of Santa Barbara General Plan, Seismic Safety and Safety Element**

The County of Santa Barbara General Plan, Seismic Safety and Safety Element, contains long-range planning guidelines and mechanisms to ensure safe development and mitigate potential hazards and safety issues within the County. As the proposed Project is located within a mapped SRA FHSZ and a LRA VHFHDZ, the Seismic and Safety Element outlines the fire development standards applicable to the proposed Project. Additionally, this element references the County Code of Ordinances that would be applicable to the proposed Project. These include (but are not limited to) the following:

- County Code Chapter 10 – Building Regulations
- County Code Chapter 12 – Civil Defense and Disaster
- County Code Chapter 14 – Grading, Erosion, and Sediment Control
- County Code Chapter 15 – Fire Prevention

### **City of Lompoc General Plan, Safety Element**

The City of Lompoc participated in the preparation of the 2011 Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan. The City adopted this plan on November 15, 2011. The document contains a thorough description of natural and man-made hazards in Lompoc with a focus on mitigation and preparedness. The Hazard Mitigation Plan, and all policies and programs contained within, is incorporated by reference in the Safety Element of the Lompoc General Plan. The City of Lompoc General Plan contains goals and polices to mitigation potential hazards and would be applicable to the portions of the proposed Project within the jurisdictional boundaries of the City.

### **4.8.3 Significance Thresholds**

Impacts to fire hazards and emergency services were analyzed in the LWEP EIR and the significance thresholds used in that EIR remain applicable to the proposed Project. At the time, the County of Santa Barbara Environmental Thresholds and Guidelines Manual did not include specific thresholds of significance for fire and police protection services. The significance thresholds used in the LWEP EIR were based, in part, on the Appendix G of the CEQA Guidelines and are applicable to SWEP. The original LWEP EIR stated that impacts would be significant of the Project would:

- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, such as where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.
- Result in unsafe fire department, paramedic, or police response times.
- Introduce development into an area without adequate water pressure, fire hydrants, adequate access for firefighting, or other requirements and infrastructure to control and fight fires.
- Result in development that would hamper fire prevention techniques such as controlled burns or backfiring in high fire hazard areas
- Impair implementation of, or physically interfere with, an adopted emergency evacuation/ response plan.

### **4.8.4 Environmental Impacts and Mitigation Measures**

Table 4.8-2 below lists the impacts and mitigation measures identified for fire hazards and emergency services in the LWEP EIR. These same impacts are addressed in this section for the SWEP. The right-hand column of the table below indicates whether the LWEP impacts or mitigation measures have been modified for the SWEP.



**Table 4.8-2. LWEP Impacts and Mitigation Measures – Fire Hazards and Emergency Services**

Impact No.	LWEP Impact Statements	LWEP Mitigation Measures	SWEP Changes
FPES-1	<b>Increased Fire Risk (Construction).</b> The Project could result in an increased risk of wildland fires that could spread to more developed areas. Fire risks include vehicle exhaust, sparks, welding, parking on dry grass, and fuel tanks.	FPES-1: Fire Protection Plan. FPES-2: Smoking and Open Fires.	Updated impact discussion. New mitigation.
FPES-2	<b>Increased Fire Risk (Operations).</b> Although the Project contains many elements that would reduce potential for severe fires, fire risks would be increased through operation of the WTGs, Project Substation, power lines, and access roads. The O&M facility would include fire suppression infrastructure.	FPES-1: Fire Protection Plan. FPES-2: Smoking and Open Fires. FPES-3: Install Gravel around Substation. FPES-4: Access Roads. FPES-5: Water Supply.	Updated impact discussion.
FPES-3	<b>Fire Department Response Times.</b> The Project would have the potential to increase demand for fire protection services.	FPES-1: Fire Protection Plan. FPES-2: Smoking and Open Fires.	Updated impact discussion. New mitigation.
FPES-4	<b>Emergency Services Response Times.</b> The influx of workers may temporarily increase the need for paramedic services during construction, although only about 10 staff would be required during operations.	None	Updated impact discussion.
FPES-5	<b>Interference with Fire Prevention Techniques.</b> The Project would introduce tall towers and a new power line into an Extreme Fire Hazard Area. In the event that controlled burns are required in the Project area, fire fighters would need to take the new structures into consideration.	FPES-1: Fire Protection Plan.	Updated impact discussion.
FPES-6	<b>Emergency Evacuation/Response.</b> For security and safety reasons, the Applicant may request that Sudden Road and upper Miguelito Canyon Road become a private road, which would be required to have a lock that could be opened by fire and other emergency service providers.	None	Updated impact discussion.

The impacts of the proposed SWEP related to fire hazards and emergency services are discussed below.

**FPES-1 Increased Fire Risk (Construction).** The Project could result in an increased risk of wildland fires that could spread to more developed areas. Fire risks include vehicle exhaust, sparks, welding, parking on dry grass, and fuel tanks.

As described in detail in the LWEP EIR, the proposed Project would result in an increased risk of wildland fires during construction. Risks analyzed during construction include those from typical construction activities and equipment, including cutting metal, welding, use of internal combustions engines, grading, road construction, vehicle use, fuel tanks, and the increase in human activity in the Project area. Adherence to County codes and requirements during construction reduces the potential for significant fire hazards. The majority of the Project site was previously designated as an Extreme Fire Hazard Area in the Santa Barbara County Coastal Plan (as published in 1982) and is designated by CAL FIRE as a Very High Fire Hazard Severity Zone (VHFHSZ), which is CAL FIRE's most severe designation. During extreme weather conditions, a grass fire originating at the site could spread off site, potentially posing a risk to life and property. The consequences of a such a fire could be severe depending on weather conditions at the time and the ability of firefighting personnel to quickly respond to the fire. Given the remote nature of the Project site, a grass fire start also poses a risk to workers. If such a fire were to start during hazardous conditions (such as Red Flag weather), construction personnel could become surrounded or be hampered in their evacuation.

In addition to the activities described in the LWEP EIR, other construction activities involving the use of vehicles and heavy machinery could result in the ignition of a wildfire. During construction, heavy equipment and passenger vehicles driving on vegetated areas prior to clearing and grading could increase the risk of fire. Heated mufflers, explosives used during site preparation or line spicing, and improper disposal of cigarettes could potentially ignite surrounding vegetation. The use of heavy equipment, such as bulldozers and graders, has the potential to accidentally ignite a fire from sparks created when equipment blades strike rocks or metal objects. If noticed by the equipment operator or other Project personnel, small ignitions can easily be suppressed by the construction equipment and/or on-site fire watch personnel. A fire could also be started by Project personnel improperly disposing of the burning cigarettes in areas covered with wildland vegetation and within 50 feet of combustible material storage.

If the introduction of invasive, non-native plants is not controlled during construction, over time the Project site could become dominated by non-native plants that tend to increase the frequency and severity of wildfires. As discussed above, based on recent scientific evidence, it is likely that anthropogenic climate change will continue to chronically enhance the potential for western U.S. forest fire activity when fuels are not limiting.

In the LWEP EIR, implementation of MMs FPES-1 (Fire Protection Plan) and FPES-2 (Smoking and Open Fires) were recommended to reduce the significance of Impact FPES-1. Several of the LWEP MMs have been incorporated into MM FPES-1 instead of being presented as stand-alone MMs. In addition to the MMs proposed in the LWEP EIR, MM FPES-6 (Red Flag Warning) would further reduce the significance of Impact FPES-1 by reducing the risk of a fire start during hazardous conditions ideal for wildfire combustion. Implementation of these MMs would reduce this impact to a less-than-significant level (Class II).

## Mitigation Measures

**MM FPES-1 Fire Protection Plan.** The Applicant shall prepare a Fire Protection Plan that meets SBCFD requirements. The plan shall contain (but not be limited to) the following provisions:

- All construction equipment shall be equipped with appropriate spark arrestors and carry fire extinguishers.
- A fire watch with appropriate firefighting equipment shall be available at the Project site at all times when welding activities are taking place. Welding shall not occur when sustained winds exceed that set forth by the SBCFD unless a SBCFD-approved wind shield is on site.
- A vegetation management plan shall be prepared to address vegetation clearance around all WTGs and a regularly scheduled brush clearance of vegetation on and adjacent to all access roads, power lines, and other facilities.
- Operational fire water tanks shall be installed prior to construction.
- Provisions for fire/emergency services access if roadway blockage occurs due to large loads during construction and operation.
- Cleared, maintained parking areas shall be designated; no parking shall be allowed in non-designated areas.
- The need for and/or use of dedicated repeaters for emergency services.
- Appropriate Hot work permits (such as cutting and welding permits) shall be obtained from the jurisdictional fire agency.
- Compliance with California PRC 4291, 4442, and 4443.

**Permit Requirements.** The Fire Protection Plan shall be provided to the SBCFD and the County for approval.

**Timing.** The plan shall be approved prior to zoning clearance.

**Monitoring.** The onsite monitor shall confirm that appropriate measures are implemented during construction. County fire inspectors verify compliance with measures applicable to operations and shall periodically spot check compliance during operations.

**MM FPES-2 Smoking and Open Fires.** Smoking and open fires shall be prohibited at the Project site during construction and operations. A copy of the notification to all contractors regarding prohibiting smoking and burning shall be provided to the County.

**Permit Requirements.** A copy of the notification to all contractors regarding prohibiting smoking and burning shall be provided to the County

**Timing.** The notification shall be provided prior to zoning clearance.

**Monitoring.** The County staff shall verify the notification prior to zoning clearances, and the onsite monitor shall confirm compliance during construction.

**MM FPES-6 Red Flag Warning.** The Applicant shall participate in the Red Flag Warning program with local fire agencies and the National Weather Service. The Applicant shall stop work during Red Flag conditions reduces the risk of wildlife ignition.

**Permit Requirements.** The construction contractor shall stop work during Red Flag conditions. If work is necessary during red flag conditions, the construction contractor shall obtain prior approval from the County and the appropriate fire agency. The County and/or the appropriate fire agency may require that work during a red flag condition utilize on-site fire monitoring or all additional conditions as deemed necessary to reduce fire risk.

**Timing.** During red flag conditions, the County and the appropriate fire agency shall be notified about potential work during red flag conditions as soon as Red Flag conditions are anticipated.

**Monitoring.** The onsite monitor shall have the authority to stop work on the Project during red flag conditions.

## **FPES-2 Increase Fire Risk (Operations).** Operation of the Project could increase baseline fire risks.

As described in detail in the LWEF EIR, operation of the proposed Project would increase the baseline potential for fires. The LWEF EIR recommended a number of MMs to reduce risks and described how the Project would be compliant with SBCFD requirements. All MMs recommended in the LWEF EIR have been incorporated into this analysis. A discussion of operational wildfire risk is presented below for each distinct Project component.

### ***Wind Turbine Generators (WTGs)***

In rare cases, WTGs can be the source of wildfire ignitions due to collection line failure, turbine malfunction or mechanical failure, and lightning- and bird-related incidents. When mechanical or electrical failures cause WTGs to catch fire, they may burn for an extended period of time due to the limited ability of fire suppression crews to effectively fight fires hundreds of feet above the ground. High-wind conditions, such as Santa Ana Wind Occurrences (SAOs), are risky for both WTG malfunction and the spread of wildfire. If a fire were to ignite during a high-wind condition, wind-blown embers from a WTG fire could potentially travel outside the WTG pad and ignite vegetation in the surrounding area. The Applicant would be required to comply with all vegetation clearance regulatory requirements around the structures on site, as described above in Section 4.8.3.

Malfunctions leading to fires in the types of WTG proposed are extremely rare. As discussed in Section 2.5.1, *Wind Turbine Generators*, and in the LWEF EIR, the WTGs would be equipped with multiple independent, redundant safety systems. The safety systems of all WTGs would comply with the codes set forth by the Occupational Health and Safety Administration (OSHA), the American National Standards Institute (ANSI), and European Union (EU) health and safety standards. The WTGs would also be equipped with a lightning protection system (see Section 2.5.1, *Wind Turbine Generators*, for a description of the lightning protection system).

The height of the WTGs could interfere with aerial firefighting operations by obstructing low-level flight paths within the site boundaries. The presence of nearby Vandenberg Air Force Base causes aerial firefighters to avoid flying in the immediate vicinity of the Project site under existing conditions. Also, aerial firefighting would not be obstructed around the perimeter of the site, ensuring that fire containment would be feasible regardless of the existence of WTGs on the landscape. Obstruction of aerial firefighting from the presence of WTGs would be minimal. In the event of a wildfire near the

WTGs, the responding agencies (CAL FIRE, SBCFD, LFD) would coordinate with VAFB for ground and aerial access.

### ***Project Substation and Switchyard***

Described in Section 2.5.2, *Project Substation*, all power generated by the WTGs would be transmitted to the on-site Project substation via the collection system. The substation would also serve as the originating point for the proposed 7.3-mile 115-kV overhead transmission line. The switchyard would serve as the connection between the Project's power generation system and the PG&E electrical system. The City of Lompoc operates its own electric system, which also connects to PG&E's system.

The proposed Project substation is located entirely within the mapped Very High Fire Hazard Severity Zone. As discussed in the LWEF EIR, the transformers located within the proposed Project substation could present a potential fire risk.

The substation surface would be covered with a layer of rock. This rock layer would act as a fire barrier. In addition, spatial separation of transformers and other equipment would be provided for in the design to prevent fire propagation (see MM FPES-3). The substation would meet or exceed Institute of Electrical and Electronics Engineers (IEEE)-979 Substation Fire Protection. Detection and extinguishing equipment would be installed in accordance with applicable national and local codes.

The proposed Project's switchyard would be located within the mapped VHFHSZ zone, and entirely within the Imerys Mine property, and near a residential development. The switchyard would be constructed in a similar fashion as the substation, covered with a layer of rock that would function as a fire barrier, and with equipment contained within a pre-manufactured concrete control building.

Some firefighting equipment would be located at the Project substation site, O&M facility, and in Project service vehicles. A 20-pound CO<sub>2</sub> fire extinguisher would be stored at the substation and at the O&M Building for small fires. In addition, service pick-up trucks would be equipped with a 5-pound standard fire extinguisher. Fire features and best management practices within the Project site would include service and access roads, which could serve as firebreaks, and regular clearing of vegetation from areas around transformers and riser poles. Further, a safety and emergency response plan would be developed in conjunction with the local Fire Marshall, as required by MM FPES-1 (Fire Protection Plan).

### ***O&M Facility***

Installation of the building would not, in itself, increase baseline fire risk. The construction of the O&M building area would include fire suppression facilities and infrastructure, including a 5,000-gallon fire water tank, a fire hydrant, and a fire sprinkler system within the O&M facility. The fire water tank would only be used for fire suppression. MMs FPES-1 (Fire Protection Plan) and FPES-5 (Water Supply) require the entire system to be approved by the SBCFD and could benefit residences and other structures in the Project area, as well as the SWEP. The Fire Protection Certificate required for the Project would address required water pressure and other infrastructure requirements such as water storage, sprinklers, and fire hydrants. Some fire-fighting equipment would be located at the maintenance yard and in vehicles.

### ***Transmission Lines***

The proposed Project includes the construction and operation of a new 115-kV transmission line, approximately 7.3 miles in length. About 5.3 miles (71%) of the transmission line would be constructed in areas mapped as High Fire Hazard Severity and 2.2 miles (29%) would be constructed in areas

mapped as Very High Fire Severity. As discussed in Section 2.5.4 the Applicant would construct the transmission line consistent with accepted industry standards, protective measures, and established industry guidelines. These include the recommended practices and procedures of the IEEE and NERC, standards for overhead line construction consistent with CPUC General Order 95 (GO95), avian protection measures consistent with the 2012 Avian Power Line Interaction Committee Guidelines, electric magnetic field design guidelines accepted for transmission design in California, and other applicable rules and standards.

Ongoing fire management and safety would include maintaining a 10-foot buffer of flammable fuels (vegetation) around the base of each wood pole structure during fire season. Under Public Resources Code, Section 4292, a minimum 15-foot clearance between vegetation and conductors is required for safety and to minimize tree-related outages. Fast-growing trees may be removed or vegetation trimmed back farther than the minimum required to achieve at least 3 to 4 years of clearance before the next trim. In addition, the maintenance program would also include removing dead, rotten, or diseased trees or vegetation that hang over or lean toward the system to prevent a falling hazard.

Fire risk associated with operation of the transmission lines would stem from factors such as SAOs and avian collisions. Routine inspections would be performed periodically along the transmission line ROW, in accordance with good utility practice of all the electrical connections, and any faulted cables or damaged insulators would be replaced as needed. Should events such as severe storms, earthquakes, or accidents result in downed power lines or poles, procedures outlined in the emergency response plan and the standard operating procedures would be applied.

### **Access Roads**

The access roads throughout the Project site could act as firebreaks in the event of a wildland fire. The new and improved roads would also allow for improved access by firefighting equipment, including for first-responders responding to wildland fires. While the proposed Project contains design features that would reduce the potential for severe fires, it still would increase baseline fire risk during Project operation. As it is located primarily in a Very High Fire Hazard Severity Zone and there are scattered residences in the vicinity of the WTGs as well as along the transmission line route, there is the potential for increased exposure of people and structures to risks associated with wildland fires. Impacts can be reduced to a less-than-significant level (Class II) with the implementation of MMs FPES-1 through FPES-45.

### **Mitigation Measures**

**MM FPES-1 Fire Protection Plan.** Described under Impact FPES-1 above.

**MM FPES-2 Smoking and Open Fires.** Described under Impact FPES-1 above.

**MM FPES-3 Install Gravel around Substation.** Gravel shall be placed around the perimeter of the Project Substation as a fire prevention measure. This requirement shall be noted on building plans.

**Permit Requirements.** This requirement shall be noted on building plans.

**Timing.** Gravel shall be installed prior to the start of operations.

**Monitoring.** The County shall verify that gravel has been installed

**MM FPES-4 Access Roads.** Access roads shall remain passable by emergency vehicles for the duration of the Project. Turnaround requirements at the terminus of access roads shall be included in roadway designs. The final design shall be approved by the SBCFD, and the final access road map (including topographic map) shall be provided to both the SBCFD and the City of Lompoc Fire Department.

**Permit Requirements.** The approved access road design shall be included on the final plans with a note that the roads shall remain passable at all times.

**Timing.** The plans shall be approved prior to zoning clearance.

**Monitoring.** County staff shall verify the approval of the access road design prior to construction approval and confirm compliance upon completion of construction. SBCFD inspectors shall periodically verify that the access roads are maintained in an acceptable condition.

**MM FPES-5 Flammable Fuel Buffers and Electrical Clearances.** Annually, a 10-foot buffer area around the base of each the transmission line's wood pole structures shall be cleared of flammable fuels (vegetation). To minimize the potential for electrical arcing between the transmission line's electrical conductors and nearby vegetation, a minimum 15-foot clearance shall be maintained between vegetation and conductors consistent with Public Resources Code Section 4292. Fast-growing trees shall be removed or vegetation trimmed back farther than this minimum required to achieve at least 3 to 4 years of clearance before the next trim. The maintenance program shall also include removing dead, rotten, or diseased trees or vegetation that hang over the conductors or lean toward the transmission line.

**Permit Requirements.** The buffer areas around each wood pole structure shall be included on the final plans with a note that a minimum 15-foot clearance shall be maintained between vegetation and conductors.

**Timing.** The plans shall be approved prior to zoning clearance.

**Monitoring.** County staff shall verify the buffer areas around wood pole structures prior to construction approval and confirm compliance upon completion of construction. SBCFD inspectors shall periodically verify that proper clearance is maintained between vegetation and conductors.

**FPES-3 Fire Department Response Times.** The Project could have the potential to increase demand for fire protection services.

As discussed in detail in the LWEP EIR, the proposed Project would have the potential to increase demand for fire protection and emergency medical services during both construction and operation. The fire department and emergency medical service response times to the Project site would be a minimum of 10 minutes and, depending on the exact location, could be substantially longer. During construction, the temporary blockage of San Miguelito Road by trucks carrying large loads (such as the WTG blades) could temporarily increase response times in the area. This could result in response times that are considered unsafe in a Very High Fire Hazard Severity Zone. Implementation of MMs FPES-1, FPES-2, and FPES-4 would reduce the impact on response times for fire protection and emergency medical services to a less-than-significant level (Class II).

## Mitigation Measures

**MM FPES-1 Fire Protection Plan.** Described under Impact FPES-1 above.

**MM FPES-2 Smoking and Open Fires.** Described under Impact FPES-1 above.

**MM FPES-4 Access Roads.** Described under Impact FPES-2 above.

### **FPES-4 Emergency Services Response Times.** The Project could temporarily increase the need for emergency medical services during construction.

As discussed in detail in the LWEP EIR and in Section 2.8.5, *Safety*, physical security of the Project site would be provided by the installation of locked gates at the entrance to all access roads. In addition, all WTGs would be locked as well, as would be the Project substation and control house, which would be fenced by an 8-foot-high barbed wire reinforced fence. Additionally, the wind facilities would be remotely monitored at all times for suspected intrusions. If an intrusion is suspected, security personnel would be deployed to the site.

As such, the proposed Project site would not be readily available to the public. This would minimize the need for law enforcement services during both construction and operation of the proposed Project. The Project site is located in a remote area at the end of a private road, as well as buffered to the south and west by Vandenburg Air Force Base, preventing public access from those areas.

Construction of the proposed Project is expected to require approximately 50 to 100 workers. These could temporarily increase the need for emergency medical services as a result of the increased potential for construction related injuries. Operation of the proposed Project would only require 5 to 7 O&M staff members and would not substantially increase the need for emergency medical services. The proposed security features of the proposed Project would limit access to only properly trained personnel and would minimize the potential for accidents from trespassing.

For the reasons stated above, the Project would not have a significant impact on fire protection and other emergency service response times (Class III). Although not required for this impact, implementation of MM-FPES-1 (Fire Protection Plan) would reduce adverse effects related to response times.

### **FPES-5 Interference with Fire Prevention Techniques.** The Project could interfere with controlled burns in the Project area.

As discussed in detail in the LWEP Final EIR and in Section 2.5.1, *Wind Turbine Generators*, the proposed Project would introduce WTGs and a new 115-kV transmission line into an area which is designated as a VHFHSZ. Historically, controlled burns have been used in parts of Santa Barbara County to control fuel loads and vegetation. If a controlled burn was deemed necessary in the proposed Project area, firefighters would be required to consider if the Project would be affected by smoke or heat. Additionally, firefighters would need to develop and plan alternate methodologies to control the spread of the fire, as the structures would inhibit certain fire-fighting methodologies.

As discussed in Section 2.5.4, *Project Transmission Line*, the proposed Project would include regular vegetation maintenance to reduce the need for a controlled burn. Implementation of MM FPES-1 (Fire Protection Plan) would help plan for firefighting activities in and around the proposed Project and would reduce this impact to a less-than-significant level (Class II).



## Mitigation Measure

**MM FPES-1 Fire Protection Plan.** Described under Impact FPES-1 above.

**FPES-6 Emergency Evacuation/Response.** ~~The~~ Temporary closure of Sudden Road and Upper Miguelito Canyon Road during construction could hinder emergency response.

As discussed in detail in the LWEP EIR and in SWEP SEIR Section 2.5.9, *Public Access*, during the construction, ~~and possibly during the operational phase of the Project~~, the Project operator and landowners using San Miguelito Road and Sudden Road beyond their intersection may request the County to temporarily close these roads to public travel. If these roads were to be closed, only the landowners involved in the Project and VAFB would use these roads. A turnaround area would be provided at the end of the ~~public~~ road near the entrance of the Project. ~~During decommissioning, the roads would be re-opened to the public. For site security and safety, locked gates may be installed across these roads. The locks would be able to be opened by fire and other emergency service providers.~~ Impacts on emergency response resulting from the temporary closure of Sudden Road and Upper Miguelito Road would not be significant (Class III).

## 4.8.5 Cumulative Effects

### Geographic Extent/Context

The geographic extent for cumulative impacts from fire hazards and emergency services is the Santa Ynez Mountains outside of the City of Lompoc. This area includes the overall “firedshed” for the proposed Project within approximately 3 miles, and areas where emergency services could be needed near the proposed Project. The aforementioned area is susceptible to wildfire given the climate, type of vegetation found, topography, and potential for wildfire. Wildfires within the Project site, as well as within the overall Santa Ynez Mountains area, have the potential to affect one another as wildfire suppression activities could be affected should the fuel matrix be significantly altered. The temporal scope for cumulative wildland fire impacts includes the duration of construction, operation, and decommissioning of the proposed Project.

A cumulative fire hazards and emergency services impact would occur if multiple projects were to simultaneously result in a wildland fire or the need for emergency services in the same geographic region, or if two projects would combined increase the risk of wildland fires above baseline. Two of the cumulative projects described in Table 3-1 are within the cumulative extent for wildland fire; these are the Sepulveda Building Materials Mining Project (Map Key Number 16) and the Hilt Winery (Map Key Number 20).

Analyzed as part of the LWEP EIR in Section 4.5.6, cumulative impacts related to Fire Protection and Emergency Services required the implementation of mitigation measures. All mitigation measures implemented for the proposed Project would serve to reduce the proposed Projects cumulative contribution to overall impacts in the region.

### Cumulative Effects

**Increased wildland fire risk during construction.** Similar to the proposed Project, the above-mentioned projects could result in wildland fire ignitions due to use of heavy equipment, smoking, or

welding. If the proposed Project, and one of these cumulative projects were to simultaneously result in a wildland fire ignition during construction, they would combine and increase the frequency of wildland fires above the baseline. The combination of these projects being constructed concurrently could substantially increase the frequency of fire in the area above natural conditions.

Implementation of the MMs required for the proposed Project (MMs FPES-1 through FPES-6) would minimize the proposed Projects contribution to this cumulative impact, and similarly, the MMs required for the other cumulative projects would minimize the potential for wildland fire ignitions from those sources. As a result, the overall cumulative increase in fire frequency would not be substantial (i.e. significant).

**Increased wildland fire risk during operation.** The above-mentioned projects would be operated concurrent with the proposed Project. These projects all present some increased risk for wildland fire ignition associated with their individual operations. The combination of these projects being operated concurrently could increase the frequency of fire in the area above baseline conditions.

Implementation of the MMs required for the proposed Project (MMs FPES-1 through FPES-6), would minimize the proposed Projects contribution to this cumulative impact, and similarly, the MMs required for the other cumulative projects would minimize the potential for wildland fire ignitions from those sources. As a result, the overall cumulative increase in fire frequency would not be substantial.

**Increased demand for fire protection services.** Fire protection services for the above-mentioned projects would be provided by the same agencies (SBCFD, LFD) that would provide services for the proposed Project. A cumulative impact would result if a demand for fire protection services were to occur and combine with other demands for fire protection services from other projects, potentially having an adverse effect on above the service goals of fire and emergency service providers.

Implementation of MMs FPES-1, FPES-2, FPES-4, and FPES-6 would minimize the proposed Projects contribution to this cumulative impact, and similarly, the MMs required for the other cumulative projects would minimize the potential for excessive demands for fire protection services from those sources. As a result, the overall cumulative increase in fire frequency would not be substantial.

**Increased demand for emergency medical services.** Emergency medical services for the above-mentioned projects would be provided by the same agencies (LFD, AMR) as for the proposed Project. During operation, the proposed Project would only have about 5 to 7 O&M employees, making the likely need for emergency medical services minimal. During construction, a cumulative impact would result if demands for emergency medical services were to occur and combine with emergency medical service demands from the other Projects.

Implementation of MM FPES-1 would minimize the Project's contribution to this cumulative impact and, similarly, the MMs required for the other cumulative projects would minimize the potential for excessive demands for emergency medical services from those sources. As a result, the overall cumulative increase in emergency medical services demand would not be substantial.

**Interfere with controlled burns and emergency evacuation.** Impacts related to interference with controlled burns and emergency evacuations are site specific and would not combine with any of the above-mentioned projects. As a result, the overall cumulative impact would not be substantial.

### 4.8.6 Residual Impacts

As summarized in Section 4.8.4, Impacts FPES-4 and FPES-6 would be less than significant. With implementation of proposed mitigation measures, residual effects from Impacts FPES-1, FPES-2, FPES-3, and FPES-5 would be less than significant.

### 4.8.7 Impact and Mitigation Summary

Table 4.8-3 below provides a summary of the SWEP’s impacts related to fire hazards and emergency services. The table also indicates the mitigation measures proposed to reduce each significant impact.

**Table 4.8-3. SWEP Impact and Mitigation Summary – Fire Hazards and Emergency Services**

Impact No.	Impact Statement	Mitigation Measures	Significance Conclusion
FPES-1	<b>Increased Fire Risk (Construction).</b> The Project could result in an increased risk of wildland fires that could spread to more developed areas. Fire risks include vehicle exhaust, sparks, welding, parking on dry grass, and fuel tanks.	FPES-1: Fire Protection Plan. FPES-2: Smoking and Open Fires. FPES-6: Red Flag Warning.	Class II
FPES-2	<b>Increase Fire Risk (Operations).</b> Operation of the Project could increase baseline fire risks.	FPES-1: Fire Protection Plan. FPES-2: Smoking and Open Fires. FPES-3: Install Gravel around Substation. FPES-4: Access Roads. FPES-5: <u>Flammable Fuel Buffers and Electrical Clearances.</u>	Class II
FPES-3	<b>Fire Department Response Times.</b> The Project could have the potential to increase demand for fire protection services.	FPES-1: Fire Protection Plan. FPES-2: Smoking and Open Fires. FPES-4: Access Roads.	Class II
FPES-4	<b>Emergency Services Response Times.</b> The Project could temporarily increase the need for emergency medical services during construction.	Although not required, FPES-1: Fire Protection Plan, would reduce the adverse impact.	Class III
FPES-5	<b>Interference with Fire Prevention Techniques.</b> The Project could interfere with controlled burns in the Project area.	FPES-1: Fire Protection Plan.	Class II
FPES-6	<b>Emergency Evacuation/Response.</b> Temporary closure of Sudden Road and Upper Miguelito Canyon Road during construction could hinder emergency response.	None required.	Class III

**Class I.** Significant unavoidable adverse impact.

**Class II.** Significant environmental impacts that can be feasibly mitigated or avoided.

**Class III.** Adverse impacts found not to be significant.

**Class IV.** Impacts beneficial to the environment.

### 4.8.8 References

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