Section 4.20
Wildfire

4.20.1 Overview

This section describes the existing wildfire conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the project. Potential wildfire impacts resulting from construction and operation of the project were evaluated based on a review of existing resources, data, and applicable laws, regulations, guidelines, and standards. This section focuses on the effects of the project related to wildfire risk. Fire protection services for the project are addressed in Section 4.15, *Public Services*.

4.20.2 Existing Conditions

The ~~following section provides~~sections below provide a brief background ~~of the~~for wildfire risk in the state and the region, the existing conditions on the project site, and the official fire hazard designations ~~of~~for the project site.

4.20.2.1 Regional and Local Wildfire Risk

Wildfire, as defined in ~~California~~ Public Resources Code (PRC) Sections 4103 and 4104, is any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. Several factors, including climate, wind patterns, native vegetation, topography, and development patterns, make the unincorporated county susceptible to wildfires. A vast amount of the county's undeveloped lands support natural habitats such as grasslands, sage scrub, chaparral, and some coniferous forest. Extended droughts, characteristic of the region's Mediterranean climate, result in large areas of dry vegetation that provide fuel for wildland fires. In addition, climate change has contributed to soil dryness. ~~This dry~~Dry vegetation is especially vulnerable to wildfire in areas with high winds. Steep hillsides and varied topography within portions of San Diego County also contribute to the risk of wildland fire~~s~~.

Fires can be ignited naturally or by human-related causes. In Southern California, over 95% of fires are started by people (County of San Diego 2010). The potential for wildland fires represents a hazard whe~~re~~n development is adjacent to open space/preserve lands or close to wildland fuels or designated fire severity zones. The ~~wildland-urban interface~~Wildland Urban Interface (WUI) is the area where structures and other human developments meet or intermingle with undeveloped wildlands or vegetative fuels. A WUI is defined by the California Department of Forestry and Fire Protection (CAL FIRE) as a buffer around areas of residential density ~~greater~~with more than 0.05 dwelling unit per acre ~~and~~. The WUI is divided into a Defense Zone (the area up to 0.25 mile from the developed area) and a Threat Zone (~~from~~ 0.25 to 1.5 miles from developed areas) (County of San Diego 2020a). The WUI is composed of communities that border wildlands or are intermixed with wildlands ~~and~~ where the minimum density exceeds one structure per 40 acres. WUI communities

are created when the following conditions occur: (1) structures are built at densities greater than one unit per 40 acres, (2) the percentage of native vegetation is less than 50%, (3) the area is more than 75% vegetated, and (4) the area is within 1.5 miles of an area ~~greater~~larger than a census block (1,325 acres).

The WUI creates an environment in which fire can move readily between structural and vegetation fuels~~, and fires~~. Fires that occur in WUI areas may affect natural resources, life, and property. Approximately 60,072 acres of the Alpine Community Plan ~~A~~area are within ~~the~~a WUI, which represents 88% of the community (County of San Diego 2020a).

The community of Alpine is at the foothills of the Peninsular Range~~ of mountains~~, which runs through Southern California and into Baja Mexico ~~in~~along a northwest to southeast trajectory. This topography allows Alpine to experience strong easterly Santa Ana winds. These winds most commonly reach their peak between September and March; however, Santa Ana winds have been experienced in every month of the year. Santa Ana wind conditions occur when cooler and drier air masses form an area of high pressure in the Great Basin region of the Pacific Southwest. This causes a pressure gradient to occur with low-pressure air masses along the Southern California coastline. ~~The phenomenon~~With this phenomenon, winds are compressed and funneled through narrow drainages formed by the mountain ranges. If the pressure gradient is large, this compression combines with gravity to cause the wind to accelerate downhill to potential hurricane speeds. The nearby Laguna and Viejas Mountains, the Sweetwater River drainage, and other significant topography within the Peninsular Range influence both winds and wildfire events, creating a historical wildfire corridor. This phenomenon also causes high wind speeds and warm, dry air that wicks moisture from the native flora, causing fuel ~~moistures~~moisture levels to lower to a critical condition. This fire hazard condition is often referred to as "~~Red Flag" levels.~~ red flag" levels. In addition to the Santa Ana wind threat, the predominant weather pattern for the Alpine area between March and September is onshore diurnal winds, often with a western trajectory and averaging near 20 miles per hour. Under these typical conditions, Alpine can experience high daily temperatures and low relative humidity (Rohde and Associates 2021).

The 2018 West Fire burned approximately 500 acres in the Alpine community, destroying 56 structures. The West Fire affected the project site directly. The fire line ~~to contain~~for containing this ~~fire~~event was ~~physically placed in the location of~~on the project site's northern boundary (Rohde and Associates 202~~0~~1).

The project site is primarily flat grassland~~s and~~ , with coastal sage~~.~~ in the northern segment of the project boundary. The adjacent Wright's Field Preserve ~~contains some~~is contoured and more sloping. Some areas are dominated by grass, but ~~is mainly~~most areas are covered primarily with a mix of sage scrub and chapparal, along with some oak woodlands. The project site and Wright's Field Preserve are on contiguous parcels~~ and form~~, forming a common wildfire compartment for the purposes of analyzing wildfire risk. They are subject to impacts from a single wildfire event and pose a wildfire risk to the adjacent WUI in the community of Alpine (Rohde and Associates 202~~0~~1). The occurrence of Santa Ana winds plus the dry climate and existing natural habitat of the project site put it at high risk for wildfire.

4.20.3 Fire Hazard Designations

CAL FIRE has mapped areas of significant fire hazards in the county through its Fire and Resource Assessment Program. CAL FIRE defines and maps Fire Hazard Severity Zones (FHSZs) to identify the potential fire hazard severity expected in different areas within the state. as required by PRC Sections 4201–4205. ~~FHSZs are determined~~An FHSZ determination is based on an area's vegetation, topography (slope), weather (including winds), crown fire potential, and ember production and movement potential. FHSZs include the classifications Very High, High, or Moderate in areas where the state is responsible for fire protection (i.e., State Responsibility Areas [SRAs]) (CAL FIRE 2007). The majority of San Diego County is included in an SRA for fire prevention and suppression. However, some areas, such as national forests, are within Federal Responsibility Areas, which are under the responsibility of the U.S. Forest Service for wildfire protection. FHSZs ~~also~~ include the classification Very High Fire Hazard Severity Zone (VHFHSZ) in areas where local agencies are responsible for fire protection (i.e., Local Responsibility Areas) (CAL FIRE 2009). In San Diego County, local fire protection is provided by fire protection districts (FPDs) and ~~County Service Areas~~county service areas in unincorporated areas, ~~and by~~along with city fire departments and joint powers agreements within city boundaries.

The project site and surrounding area are within an area identified as a VHFHSZ in an SRA (Figure 4.20-1).

4.20.3.1 Fire and Emergency Response

The County of San Diego (County) Office of Emergency Services (OES) coordinates the overall County response to disasters. OES notifies appropriate agencies when a disaster occurs, coordinates with responding agencies, ensures that resources are available and mobilized, plans for the response to and recovery from disasters, and develops preparedness materials for the public. OES acts as the staff to the Unified Disaster Council (UDC), which was established under a joint powers agreement among all 18 incorporated cities and the County, coordinating plans and programs countywide to ensure the protection of life and property.

Fire protection services for the project site are provided by the Alpine FPD, which covers 27.5 square miles (County of San Diego 2011a). ~~The~~ Alpine FPD Station 17 is at 1364 Tavern Road, approximately 2.7 miles from the project site. Station 17 has a Type- 1 ~~Advanced Life Support/Paramedic Structure Fire Engine,~~ advanced-life-support/paramedic structure fire engine. It also cross staffs a Type- 3 ~~Wildland Fire Engine~~wildland fire engine, has a ~~Chief Officer~~chief officer, and houses a ~~Paramedic Ambulance,~~paramedic ambulance 24 hours ~~every~~a day. Alpine FPD also has a joint agreement ~~for immediate services~~ with neighboring fire agencies in the Central Zone of San Diego County ~~and~~for immediate services; it also maintains dispatch services through the Heartland regional dispatch center. Wildland fire protection for the immediate area of Alpine is provided ~~to~~in SRA wildlands by the CAL FIRE San Diego Unit. CAL FIRE, as the contract provider of services for the San Diego County FPD, also provides structural fire and rescue services to the unincorporated areas of San Diego County ~~as the contract provider of services for the San Diego County Fire Authority~~. Some areas in the community of Alpine are covered by both agencies, ~~where~~with fire protection for Local Responsibility Area structural services ~~are~~ provided by Alpine FPD and wildland fire protection ~~is~~ provided to the SRA by CAL FIRE. ~~For an event requiring~~Nearby federal lands within the Cleveland National Forest are under the jurisdiction of the U.S. Department of Agriculture, Forest Service (USFS). The USFS, which is responsible for wildland fire protection on the National Forest,

maintains a fire station in the community of Alpine. Automatic aid agreements exist between CAL FIRE, USFS, and Alpine FPD, ensuring a response from ~~both, the two agencies would respond concurrently in a coordinated manner.~~ the closest appropriate resource to a reported emergency, regardless of jurisdictional boundary.

0 500 1,000 Feet
1 in = 1,000 ft

Figure 4.20-1
Very High Fire Hazard Severity Zone (VHFHSZ)
Alpine Park Project

\\PDCCITRDSGIS1\Projects_1\County_of_San_Diego\DPRIMSA_557775\TO33_Alpine_Park_HCP\Figures\Doc\EIR\Fig04_20_1_FireSeverity.mxd; User: 19542; Date: 9/6/2021

4.20.4 Wildfire Hazards

As referenced within Section 4.9*, Hazards and Hazardous Materials*, a Fire and Emergency Operation Assessment (FEOA) was prepared to identify specific wildfire risks at the project site (Rohde and Associates 2021); the following information in this section is from the FEOA (Appendix J). The FEOA noted that, historically, the project site has been subject to wildfires. In 2018, the West Fire affected the proposed Alpine Park site directly. The fire line for containing the West Fire was on the proposed park's northern boundary. In 1970, the Laguna Fire also burned much of the proposed park area. The FEOA identified site-specific wildfire and ignition risks associated with the project site and recommended fire prevention measures, as stated below:

- *Proximity to South Grade Road, a known location with increased human-related fire ignition factors*. The location of South Grade Road, on the southeast boundary of the land for Alpine Park, poses elevated ignition risks because of passing vehicles—specifically, vehicle exhaust, hot materials discarded from vehicles, vehicle accidents, off-road parking, dragging tow chains, or related hazards. However, the County will continue to maintain an existing 30-foot buffer where vegetation has been cleared adjacent to the roadside along the County property, which has been historically cleared and is required by the Alpine Fire Protection District, and is not part of this project. As part of the proposed project, the County would create an additional 20-foot buffer adjacent to the existing 30-foot buffer along the park footprint, for a total of 50 feet. As part of the proposed project, the County would also create an additional 20-foot buffer adjacent to the existing 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel.
- *Adjacency of the site to significant human activity, including homes and ranches*. The proximity of homes and ranches to County Department of Parks and Recreation (DPR) and Back Country Land Trust (BCLT) lands poses risks from human-related fire ignition factors, extending from these properties to the site. For this risk, the County will continue to maintain a historically cleared and existing 100-foot buffer where vegetation has been cleared where there are adjoining properties along the northern boundary of the County-owned parcel, which is required by the Alpine Fire Protection District and is not part of this project. As part of the project, the County would create a 100-foot buffer that would extend from the volunteer pad.
- *Robust public usage of the site for both dispersed and organized recreation*. Human use could increase on the site with development of the park, thereby increasing the associated human-related fire ignition factors. The historical unregulated public use of these lands would now be regulated and managed by the County DPR. This includes the introduction of new and enhanced fire prevention measures. Development of the sports fields, associated parking, public facilities, and support buildings would include landscaping to isolate these facilities from the surrounding wildland, a requirement of the fire and building codes. This would reduce wildfire exposure and ignition risks. The County DPR would coordinate with the utility service provider to consider undergrounding the adjacent electric utility services. Additional fuel reduction measures would also be implemented to further isolate these uses for public safety and ignition resistance
- *Location of the park site with respect to historical major wildfire corridors*. Historical wildfire corridors that experience both Santa Ana winds and onshore wind-driven conditions are within proximity of the project site. Past wildfires have traversed this corridor. However, fuel modification and the placement of developed park features would aid in containing wildfire

movement within this corridor. A fire line was established in the past within the Wright's Field site for containment purposes.

- *Heavy fuel concentrations on some County/BCLT lands*. Heavier fuels could present extreme burning characteristics during critical fire weather, including high thermal outputs, rapid rates of spread, and spotting. Because heavy fuel is concentrated primarily on BCLT lands, the County would coordinate with BCLT to alleviate wildfire risks and prevent fire from either entering the preserve from adjacent property or moving through preserve lands and affecting private properties.
- *Current off-road parking and occasional vehicle trespass*. Trespassing does occasionally occur, although vehicle access is currently blocked by light fencing. Park development is expected to strengthen the vehicle control barriers and provide improved fire-safe parking.
- *Potential increase in demand for local public safety resources due to the developed park use*. New demands on public safety resources resulting from the development of new park facilities is not expected to place unmitigable demands on local fire or law enforcement services. For this risk, a full review of the existing response capability and potential development impacts was conducted, as discussed in the FEOA. In addition, the project would employ an on-site staff that would provide new security for park facilities upon build-out.

4.20.4.1 Fuel Reductions and Modifications

As discussed in Section 4.20.4, *Wildfire Hazards*, and shown in Figure 4.20-2, existing and proposed long-term fuel reductions and fuel modifications implemented throughout the County property. Fuel reductions and modifications, which would include vegetation clearance, would be implemented to reduce wildfire intensity, thereby offering reasonable protection for adjacent structural assets, limiting landowner liability associated with wildfire damage to adjoining properties, providing protection for DPR/BCLT site development, and ensuring safe public refuge at key sites. Existing and proposed fuel reductions would occur along the northern perimeter of the Alpine Park facility and adjoining properties, as well as along the roadside, to reduce hazards associated with increases in human-related fire ignition factors. The roadside fuel clearance also reduces any extension of wildfire from the historical wildfire corridor on the east face of the site.

\\PDCCITRDSGIS01\Projects_1\County of San Diego\DPR\MSA_557775\TO10_Alpine_Park\Data\ResourceData\Old\NS\Alpine_Fire_Buffer\Fig4.20-2_FuelReductions.mxd 12/13/2022 56606

Figure 4.20-2
Fuel Reductions
Alpine County Park Project Environmental Impact Report

~~4.20.4~~4.20.5 Applicable Laws and Regulations

~~4.20.4.1~~4.20.5.1 Federal

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of ~~any substance~~substances that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

International ~~Wildland-Urban Interface~~WUI Code

The International WUI Code is published by the International Code Council and is a model code addressing wildfire issues.

Federal Wildland Fire Management Policy

The 1995 Federal Wildland Fire Management Report produced the first ~~single~~ comprehensive federal fire policy for the Departments of the Interior and Agriculture. That review was stimulated by the 1994 fire season with its 34 fatalities and growing recognition of fire problems caused by fuel accumulation. The resulting 1995 ~~Federal Fire Policy~~policy recognized, for the first time, the essential role of fire in maintaining natural systems. In the aftermath of the escape of the Cerro Grande ~~Prescribed Fire~~prescribed fire in May of 2000, the Secretaries of the Interior and Agriculture requested a review of the 1995 ~~Federal Fire Policy and its implementation~~policy and updated ~~its policies~~it in the 2001 ~~R~~review and ~~U~~update of the 1995 Federal Wildland Fire Management Policy. *Guidance for Implementation of Federal Wildland Fire Management Policy* (U.S. Forest Service et al. 2009) ~~outlines~~provides the following guidelines that should be used to ~~provide~~ensure consistent implementation of federal wildland fire policy:

- Firefighter and public safety is the first priority in every fire management activity~~.~~;
- The role of wildland fire as an essential ecological process and natural change agent will be incorporated into the planning process~~.~~;
- Fire management plans, programs, and activities support land and resource management plans and their implementation~~.~~;
- Sound risk management is a foundation for all fire management activities~~.~~;
- Fire management programs and activities are economically viable, based ~~up~~on the values to be protected, costs, and land and resource management objectives~~.~~;
- Fire management plans and activities are based ~~up~~on the best available science~~.~~;

- Fire management plans and activities incorporate public health and environmental quality considerations~~.~~;
- Federal, state, tribal, local, interagency, and international coordination and cooperation are essential~~.~~; and
- Standardization of policies and procedures among federal agencies is an ongoing objective.

~~4.20.4.2~~4.20.5.2 State

California Emergency Services Act

The California Emergency Services Act was adopted to establish the state's roles and responsibilities during human-caused or natural emergencies that result in disaster conditions ~~of disaster~~ and/or extreme peril to life, property, or resources of the state. This act is intended to protect health and safety by preserving the lives and property of the people of the state.

California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act provides financial aid to local agencies ~~to~~ assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The act is activated after a local declaration of emergency and the California Emergency Management Agency gives concurrence with the local declaration, or after the ~~G~~governor issues a proclamation of a state emergency. Once the act is activated, the local government is eligible for certain types of assistance, depending on the specific declaration or proclamation issued.

California Department of Forestry and Fire Protection

CAL FIRE protects the people of California from fires, responds to emergencies, and protects and enhances forest, range, and watershed values providing social, economic, and environmental benefits to rural and urban citizens. CAL FIRE's firefighters, fire engines, and aircraft respond to an average of more than 5,400 wildland fires each year (CAL FIRE 2016). The Office of the State Fire Marshal supports CAL FIRE's mission by focusing on fire prevention. It provides support through a wide variety of fire safety responsibilities including by regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention in wildland areas; regulating hazardous liquid pipelines; reviewing regulations and building standards; and providing training and education in fire protection methods and responsibilities.

2018 Strategic Fire Plan for California

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

In 2018, the Board of Forestry and Fire Protection adopted a new strategic fire plan to ~~update and~~ address fire concerns in California. The board has adopted fire plans since the 1930s and periodically updates them to reflect current and anticipated needs. Over time, as the environmental,

social, and economic landscape of California's wildlands ~~has~~ changed, the board has evolved the Strategic Fire Plan to ~~better~~ respond to these changes and to provide CAL FIRE with appropriate guidance "for adequate statewide fire protection of state responsibility areas" (PRC Section 4130). The 2018 Plan calls for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire, all achieved through local, state, federal, tribal, and private partnerships.

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

- Improve the availability and use of consistent, shared information on hazard and risk assessment~~.~~;
- Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities~~.~~;
- Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans~~.~~;
- Increase awareness and actions to improve the fire resistance of at-risk man-made assets ~~at risk~~ and the fire resilience of wildland environments through natural resource management~~.~~;
- Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers~~.~~;
- Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services~~.~~; and
- Implement needed assessments and actions for post-fire protection and recovery.

California Public Resources Code

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

In 1965, PRC Sections 4201–4204 directed CAL FIRE to map areas ~~of~~with significant fire hazards, based on fuels, terrain, weather, and other relevant factors. These FHSZs define the application of various mitigation strategies to reduce risks associated with wildland fires.

Very High Fire Hazard Severity Zones – Government Code Sections 51175–51189

In 1992, Government Code Sections 51175–51189 established the classification for very high fire hazard severity based on fuel loading, terrain, weather, and other relevant factors identified by CAL FIRE as major causes of wildfire spread and ~~on~~ the severity of fire hazard ~~that is~~ expected ~~to prevail~~ in those areas. The code established ~~the~~ requirements for those that maintain an occupied dwelling within a designated VHFHSZ. The VHFHSZs define the application of mitigation measures to reduce risk associated with uncontrolled wildfires and require that the measures be taken. Local agencies designate the VHFHSZs within their jurisdictions as required by CAL FIRE.

Senate Bill 1241

In 2012, Senate Bill 1241 added Section 66474.02 to Title 7, Division 2, of the California Government Code, commonly known as the Subdivision Map Act. The statute prohibits subdivision of parcels

designated very high fire hazard, or that are in an SRA, unless certain findings are made prior to approval of the tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are, in brief: (1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in PRC Sections 4290–4291; (2) structural fire protection services will be available for the subdivision through a publicly funded entity; and (3) ingress and egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

Fire Safe Development Regulations

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

California Building Code and Fire Code

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

The CFC includes requirements for building construction and vegetation management within areas designated as WUI areas. In such areas, all new buildings must comply with the CBC, which defines construction requirements to reduce wildfire exposure. In addition, buildings within the WUI must comply with California laws and regulations that require maintenance of a “defensible space” of 100 feet from structures (PRC § 4291; CCR § 1299.03). In particular, CBC Chapter 7A applies to building materials, systems, and/or assemblies used in the exterior construction of new buildings within a WUI. Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building in an FHSZ and an SRA or WUI to resist the intrusion of flames or burning embers projected by a vegetation fire. Therefore, the CFC contributes to a systematic reduction in conflagration losses. New buildings in an FHSZ or any WUI, as designated by an enforcing agency, constructed after the application date shall comply with the provisions of Chapter 7A. County DPR will be responsible for the review of structural development within the park for fire code compliance.

State Fire Regulations

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

4.20.5.3 ~~Local~~Regional

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The federal Disaster Mitigation Act of 2000 requires all local governments to create a disaster plan in order to qualify for hazard mitigation funding. The Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2017) is a countywide plan that identifies risks and ways to minimize damage by natural and human-made disasters. The plan is a comprehensive resource document that serves many purposes, such as enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination.

The Multi-Jurisdictional Hazard Mitigation Plan addresses wildfire risks within the San Diego region by assessing the exposure ~~to wildfire hazard of populations~~ in the different jurisdictions ~~within the region~~. The assessment ~~includes~~ considers the exposure of the population, residential buildings, and commercial buildings~~,~~ as well as the exposure of critical facilities and infrastructure, such as airports, bridges, and electric power facilities. The plan then outlines goals, objectives, and actions for each jurisdiction within the San Diego region. Goals related to wildfire typically include reducing the possibility of damage and loss ~~due to structural/wildfire~~. Objectives and actions related to wildfire typically include measures such as updating ~~fire and~~ evacuation plans, maintaining vegetation management policies, and maintaining an adequate emergency response capability.

~~County of~~ San Diego ~~Operational Area~~ County Emergency Operations Plan

~~The Office of Emergency Services~~OES implements the Operational Area Emergency Operations Plan in collaboration with the Unified San Diego County Emergency Services Organization (Unified San Diego County Emergency Services Organization and County of San Diego 2018). The plan is ~~for use~~used by the County and all of the cities within the county to respond to major emergencies and disasters. It describes the roles and responsibilities of all County departments ~~(~~, including many city departments~~)~~, and the relationship among the County ~~and~~, its departments, and the jurisdictions within the county. The plan contains 16 annexes, detailing specific emergency operations for different emergency situations.

San Diego County WUI Fire Emergency Response Plan

The San Diego County Fire Chiefs Association and the San Diego County Police Chiefs' and Sheriff's Association approve the San Diego County WUI Fire Emergency Response Plan, which is the County's standard emergency response and evacuation management plan format for wildfire. The San Diego County WUI Fire Emergency Response Plan was updated for the Alpine southeast area in the Rohde and Associates FEOA (2021). This document is attached to the FEOA report as Appendix J.

The plan provides critical information regarding risk assessment, hazards, emergency resource necessities, and tactical evacuation. The tactical plan offers an evacuation plan and recommended strategies or tactics for combating wildfire. County DPR shall implement the project in compliance with the plan, as outlined in this chapter. Staff will become familiar with the plan and be prepared to integrate with public safety responders in response to emergencies at the site. Furthermore, staff members should consider the evacuation and "trigger point" criteria in the plan and determine if additional time will be required to mobilize internal staff members and implement the plan. Park personnel are urged to develop additional emergency response plans consistent with this document and the means and methods necessary for emergency communications with the public.

County of San Diego Municipal Code

The County of San Diego Municipal Code Title 9, Division 6, Fire Protection (County Fire Code), adopts the CFC with modifications or amendments specific to the local climatic, geological, or topographical conditions of the county. The County Fire Code provides definitions, requirements, and procedures for permits; and regulations for building, repair, maintenance, demolition, and equipment use ~~of buildings~~ and ~~structures and new or existing~~ fire protection systems. The County Fire Code authorizes the County Fire Warden ~~as~~to be the party responsible for enforcement of the County Fire Code in the unincorporated areas of the county that are outside an FPD. In an FPD, the district fire chief or his/her duly authorized representative is responsible for enforcement.

County of San Diego Code of Regulatory Ordinances Sections 68.401–68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses issues associated with an accumulation of weeds, rubbish, and other materials on private property that creates a fire hazard and could be injurious to the health, safety, and general welfare of the public. Under the ordinance, the presence of such weeds, rubbish, and other materials is a public nuisance that requires abatement in accordance with the provisions of Sections 68.401–68.406. The ordinance is enforced in all county service areas as well as unincorporated areas of the county that are outside a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many have adopted the County's ordinance.

County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards

The San Diego County Fire Protection District, in partnership with CAL FIRE, the Bureau of Land Management, and USFS, is responsible for enforcing defensible space inspections. Inspectors from CAL FIRE are responsible for the initial inspection of properties, ensuring that an adequate defensible space has been created around structures. If violations of program requirements are noted, inspectors provide a list of required corrective measures and a reasonable timeframe for completing the task. If violations still exist upon reinspection, the local fire inspector will forward a complaint to the County for further enforcement action.

County of San Diego Consolidated Fire Code

The County of San Diego, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001; it contains County and fire protection district amendments to the CFC. The purpose of consolidation with respect to the adoptive ordinances of the County and local fire districts is to promote consistency in the interpretation and enforcement of the CFC and protect

public health and safety. This involves permit requirements for the installation, alteration, or repair of fire-protection systems and penalties for violations of the code. The Consolidated Fire Code provides minimum requirements for access, water supply and distribution, construction, fire-protection systems, and vegetation management. In addition, it regulates hazardous material and provides associated measures to ensure that public health and safety are protected from incidents related to hazardous substance releases.

County Department of Planning and Land Use Fire Prevention in Project Design Standards

Following the October 2003 wildfires, the County Department of Planning and Land Use (now Planning & Development Services) incorporated several fire prevention strategies into the discretionary project review process for California Environmental Quality Act (CEQA) projects. One of the more significant changes is the requirement that calls for most discretionary permits (e.g., subdivision and use permits) in WUI areas to include a fire protection plan for review and approval. A fire protection plan is a technical report that considers the topography, geology, combustible vegetation (i.e., fuel types), climatic conditions, and fire history at the project location. The plan addresses the following items (among others) in terms of compliance with applicable codes and regulations: water supply, primary and secondary access, travel time to the nearest fire station, structure setback from property lines, ignition-resistant building features, fire-protection systems and equipment, impacts on existing emergency services, defensible space, and vegetation management.

County of San Diego General Plan

The *County of San Diego ~~County~~ General Plan* (County of San Diego 2011b) Safety Element contains policies that are applicable to wildfire~~ in the Safety Element~~, as follows:

Policy S-3.1. Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

Policy S-3.2. Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

Policy S-3.3. Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas~~,~~ or islands of flammable vegetation within a development.

Policy S-3.4. Service Availability. Plan for development where fire and emergency services are available or planned.

Policy S-3.5. Access Roads. Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.

Policy S-3.6. Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.

Policy S-3.7. Fire-~~-~~Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition-~~-~~resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting ~~of~~ existing structures in high fire-~~-~~threat areas.

Policy S-6.3. Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.

Policy S-6.4. Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

~~4.20.4.3~~4.20.5.4 Local

Alpine Fire Protection District Ordinance

The Alpine FPD was formed in 1957 to provide fire protection for the community of Alpine. Its Board of Directors created the Alpine FPD Ordinance (No. 2020-01), which adopted the CFC, including Appendices B, C, H, I, and K; the International Fire Code; and National Fire Protection Association Standards 13, 13-R, and 13-D, as referenced in Chapter 80 of the CFC, together with Alpine FPD amendments. The CFC is adopted for the protection of public health and safety. The Alpine FPD Ordinance (most recently adopted edition) includes additions, insertions, deletions, and changes to sections and chapters of the CFC.

Alpine Community Wildfire Protection Plan

The original Alpine Community Wildfire Protection Plan was developed by the Alpine Public Safety Committee, a subcommittee of Supervisor Dianne Jacob's Alpine Revitalization Committee, with guidance and support from the U.S. Forest Service, CAL FIRE, California Department of Transportation, County ~~Office of Emergency Services~~OES, County Department of Planning and Land Use (now Planning & Development Services), County Sheriff's Department, Alpine FPD, Viejas Fire Department, and Greater Alpine Fire Safe Council. The intent of the plan is to optimize the use of scarce resources (i.e., money, people~~, and~~ equipment) to achieve the greatest overall benefit to the community (Alpine Public Safety Committee 2021). The primary goal is to prioritize projects, as follows:

- Defensible space around structures,
- Defensible space along evacuation routes, and
- Hazardous fuels reductions.

A key element of the planning strategy is to link together existing and future fuel-reduction projects so they can provide contiguous corridors of protection along a perimeter surrounding the Alpine area. The areas being linked together ~~include~~ involve defensible space projects for community homes and evacuation routes, natural and/or human-made fuel breaks created through agency efforts, and burned areas. Priority is then given to those areas that can achieve the greatest degree of protection with the limited resources available.

Alpine Community Plan

The *Alpine Community Plan* (County of San Diego 2020b) outlines guidelines and policies for development within the community plan area. The policies and recommendations that apply to wildfire risk are as follows:

Safety Policy 3. Encourage development with fire-preventive development practices and fire resistant plant types.

Safety Policy 4. Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports.

Conservation Policy 13. Encourage the continuation of support for the brush management program in conjunction with other public agencies to reduce wildfire hazards.

~~4.20.5~~4.20.6 Project Impact Analysis

~~4.20.5.1~~4.20.6.1 Methodology

Analysis of potential impacts related to wildfire was based on the ability of fire personnel to adequately serve the existing and future population of the project site, as well as federal, state, and local regulations regarding wildfire.

~~4.20.5.2~~4.20.6.2 Thresholds of Significance

Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining the significance of impacts associated with wildfire risk and wildfire-related hazards. Impacts are considered significant if the project would be in or near SRAs or lands classified as VHFHSZs, and would result in any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan.
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks ~~of,~~ and thereby expose project occupants to~~,~~ pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
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 risks or ~~that may~~ result in temporary or ongoing impacts on the environment.
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.

County of San Diego Guidelines for Determining Significance

The following *County of San Diego Guidelines for Determining Significance ~~for~~, Wildland Fire and Fire Protection* (County of San Diego 2010~~) provide guidance for evaluating~~), guide the evaluation of adverse environmental effects that a proposed project may have from wildland fire. The ~~guidance~~ document ~~addresses~~includes wildfire-related ~~State CEQA Guidelines~~ Appendix G threshold questions addressed in other sections of this EIR, including Threshold 2 in Section 4.9, *Hazards and Hazardous Materials*; Threshold 1 in Section 4.15, *Public Services;* Threshold 4 in Section 4.17, *Transportation and Circulation*; and Threshold 2 in Section 4.19, *Utilities and Service Systems*. Please refer to the~~se~~ listed sections to see the applicable analysis related to the~~se~~ thresholds.

~~4.20.5.3~~4.20.6.3 Project Impacts and Mitigation Measures

Threshold 1: Implementation of the project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

County Park and Trails and Open Space/Preserve

Impact Discussion

The Operational Area Emergency Operations Plan is used by unincorporated county areas and all ~~of the~~ cities ~~with~~in the county to respond to major emergencies and disasters. The plan establishes roles and responsibilities for ~~the~~ County departments and the jurisdictions and outlines ~~the~~ emergency operations for the response to different ~~possible~~ emergency situations. The plan indicates that specific evacuation routes would be determined ~~based on~~according to the location~~s~~ and extent of the incident and ~~would~~ include as many predesignated transportation routes as possible. According to Annex Q, Evacuation, primary evacuation routes identified in the plan consist of ~~the~~ major interstates, highways, and prime arterials ~~with~~in San Diego County (Unified San Diego County Emergency Services Organization and County of San Diego 2018). Conflict could occur with an adopted emergency response plan or emergency evacuation plan if the project ~~prevents the~~were to prevent safe evacuation ~~in the case of~~during an emergency~~,~~ or otherwise prevent~~s the~~ safe and timely management of an emergency situation.

Construction

Construction would occur in one phase over 16 months and is anticipated to begin in fall 2022. Construction equipment would include tractors, excavators, backhoes, a water truck, ~~a~~ drill rig, ~~a~~ bobcat, ~~a~~ forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, ~~a~~ crane, and ~~a~~ concrete truck. Construction activities would occur between 7 a.m. and 7 p.m., in compliance with County of San Diego Noise Ordinance. Construction staging ~~activities~~ would occur on the project site. Construction may result in ~~temporarily~~ partially blocked travel lanes along South Grade Road due to the use of large construction equipment, construction material deliveries, or construction of project features adjacent to South Grade Road. These temporary lane closures could delay or obstruct the movement of emergency vehicles along South Grade Road. However, when construction interrupts the normal function of a roadway, a Traffic Control Permit ~~must~~would be obtained from DPW. County DPR or its contractors would be responsible for obtaining the Traffic Control Permit, which requires the installation and maintenance of appropriate traffic controls, in accordance with a traffic control plan. The traffic control methods used to maintain a safe flow of traffic ~~flow~~ could include barriers, signs, ~~and~~or flags. Implementation of the traffic control plan would ensure the safe passage of emergency vehicles in the public right-of-way. Additionally, construction activities and the traffic control plan would not prevent emergency vehicles from reaching the project site. County Fire Services staff (i.e., County Fire Marshal~~l~~) review all proposed projects to ensure onsite access is accessible for emergency vehicles and onsite utilities are ~~sufficient~~adequate for emergency response. Therefore, the project would be submitted to the County Fire Marshal~~l~~ for review and approval. In addition, the project would comply with the applicable requirements set forth by the County of San Diego Multi-Jurisdictional Hazard Mitigation Plan and the Operational Area Emergency Operations Plan during an emergency.

Operation

Operation of the project would include passive and active recreational facilities and would introduce new staff and visitors to the project site, which currently is undeveloped. ~~County DPR is preparing a Site Evacuation Plan as part of the project that outlines the evacuation routes~~Main access to ~~be used by visitors and staff within the Alpine Park site in the event of an onsite or offsite emergency situation. The Site Evacuation Plan only addresses evacuation within the boundaries of the project site; once visitors leave~~ the park~~, evacuation~~ would be ~~under the jurisdiction of the Unified~~ provided on the east side of the property at a new four-way stop-controlled intersection at South Grade Road and Calle de Compadres. A secondary entrance would be constructed at the south end of the park as a driveway into and out of the parking lot. The project would not include any roadway improvements to South Grad Road, beyond constructing a decomposed granite pathway in the existing right-of-way adjacent to the park. The bike lanes would act as a by-pass in an emergency situation. Staff members would become familiar with the San Diego County WUI Fire Emergency ~~Services Organization, Alpine FPD, and other responsible agencies. Neither implementation of the Site Evacuation Plan nor the project as a whole would result in structures or activities that would substantially obstruct or interfere with emergency vehicles or impair emergency~~ Response Plan for the Alpine southeast area and be prepared to integrate with public safety responders in response ~~or evacuation plans.~~

~~Based on the evaluation provided~~ to emergencies at this site. Please refer to Appendix K for the Alpine Community Park Fire Evacuation Analysis prepared by ~~Rohde and Associates, given the proximity of Alpine FPD Station 17,~~Chen Ryan Associates (August 2022). This analysis assessed the time required for evacuation from the project site under several scenarios (e.g., a wind-driven fire ~~services could respond to an emergency situation at~~ that results in a required evacuation, affecting the project site ~~in~~ and surrounding community).

The traffic evacuation analysis presented in the Alpine Park Fire Evacuation Plan shows the vehicle travel times required under ~~5~~various evacuation events. Nine scenarios were considered. For a conservative scenario, the analysis assumes that all the households, businesses, and vehicles would leave together once an evacuation order is issued. Specifically, the evacuation analysis assumes that up to 240 vehicles would evacuate from the project site. This assumption represents full occupancy of the project site. The analysis also assumes that up to 4,029 vehicles and 4,432 vehicles would evacuate the surrounding land uses under the existing and cumulative scenarios, respectively. Key points from the analysis are provided below. Detailed results and discussions are provided under the respective sections of the analysis provided in Appendix K.

- It would take up to 2 hours and 31 minutes ~~with initial~~ to evacuate existing land uses via South Grade Road and Alpine Boulevard (Scenario 1). If the two-way left-turn lane (TWLTL) along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 33 minutes (Scenario 2).
- Evacuating project traffic only (Scenario 3) would take up to 31 minutes.
- Evacuating all existing land uses and project traffic via South Grade Road and Alpine Boulevard would take up to 2 hours and 40 minutes (Scenario 4). If the TWLTL along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 41 minutes (Scenario 5). Thus, the project increases the total evacuation time by 9 minutes and 8 minutes, respectively.
- Under the cumulative scenario, it would take up to 2 hours and 41 minutes to evacuate the cumulative land uses via South Grade Road and Alpine Boulevard (Scenario 6). If the TWLTL

along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 44 minutes (Scenario 7).

- Evacuating all cumulative land uses and the project via South Grade Road and Alpine Boulevard would take up to 2 hours and 53 minutes (Scenario 4). If the TWLTL along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 50 minutes (Scenario 5). Thus, the project increases the total evacuation time by 12 minutes and 6 minutes, respectively.

The project proposes several features that would enhance evacuation operations; these are not reflected in the evacuation scenarios and average evacuation times. These features include the existing and proposed fuel modification zones within the project site as well as the fuel modification area along the project's frontage (see Figure-4.20-2). In addition, temporary areas for safe refuge would be provided. Because the project would provide a sizable area that would be ignition resistant, emulating urbanized areas where wildfire spread can be halted, emergency managers may halt evacuations at the project site at any point to move higher-priority traffic. The project may also serve as a temporary evacuation point for evacuees from other areas, given its design as a fire-resistant zone.

Neither CEQA nor the County has numerical time standards for determining whether an evacuation timeframe is appropriate. Public safety, not time, is generally the guiding consideration for evaluating impacts related to emergency evacuation. The County considers a project's impact on evacuation significant if it impairs or physically interferes with implementation of an adopted emergency response or evacuation plan or exposes people or structures to a significant risk of loss, injury, or death from wildland fires.

The evacuation scenarios presented in the analysis found that evacuation traffic generated by the project would not increase average evacuation travel times significantly or result in unsafe evacuation timeframes. The flow of evacuation traffic would be effectively managed. In addition, structural fire, rescue, and emergency medical services in the Local Responsibility Area are provided by Alpine FPD, which staffs its fire stations with personnel from a number of fire service agencies in the Alpine region.

Table 4.15-1, Fire Protection Facilities in the Project Vicinity, in Section 4.15*, Public Services*, indicates the locations and types of fire resources that are available for emergency response. Alpine FPD Station 17 is 2.7 miles away from the project site. Fire service resources at Station 17 are available to the community in less than 5 minutes for an initial response and within 15 minutes for most multi-unit responses~~, which~~; these would be facilitated by the Heartland Dispatch Center and surrounding cooperating fire agencies~~.~~ (Rohde and Associates 2021). Additionally, Rohde and Associates concluded that operation of the project would result in less than one emergency response call per day on average, which was estimated based on the number of daily park users at estimated peak visitation. Alpine FPD Station 17 currently conducts one to three service calls per day with substantial capacity for additional service calls.

Therefore, the project would not increase demand on existing emergency response services such that it would impair an adopted emergency response plan or emergency evacuation plan.

Impact Determination

The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Implementation of the project would not due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

County Park and Trails and Open Space/Preserve

Impact Discussion

The project is in an area that, due to the climate, common Santa Ana wind conditions, and topography, is prone to wildfire risk. The project site is identified as a VHFHSZ and has burned during wildland fire events before. The project site slopes to the south, with the more substantial slopes on the northern end of the project site. The highest elevation is approximately 2,030 feet at the northern site boundary and the lowest is approximately 1,970 feet at the southern boundary.

Construction

As noted, the project site is partially within a VHFHSZ, and heat or sparks from construction equipment or vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds that are typically experienced in the summer and fall, but can occur year-round in the San Diego region. County DPR and its contractors would implement standard best management practices (BMPs) intended for the mitigation of potential ignition sources, including:

- All vehicles ~~must~~would be required to carry a fire extinguisher in case of accidental fire ignition~~.~~,
- Vehicles ~~cannot~~would not be permitted to park or idle over dry brush~~.~~, and
- Proper wildfire awareness, reporting, and suppression training will be provided to construction personnel.

Implementation of ~~the~~ standard BMPs would reduce the potential for ignition and increase the ability of ~~onsite~~on-site workers and staff to control and extinguish a wildfire event. Therefore, construction of the project would not exacerbate the conditions and wildfire risk on site, thereby exposing people to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Operation

Operation of the project could introduce new conditions that could exacerbate wildfire risk at the project site. While development of the project would reduce the fuel load on the project site by developing natural habitat with built environment, operation of the project would introduce visitors to the project site that were not previously present. Given the high percentage of wildfires in

Southern California that are ignited by human-related causes, this could exacerbate the existing wildfire risks on site.

The project would comply with County Code of Regulatory Ordinances~~,~~ Title 3, Division 5, Chapter 3, and Appendix II-A of the Uniform Fire Code. Furthermore, County DPR would be required to comply with the Defensible Space for Fire Protection Ordinance (2011). The ordinance requires combustible vegetation; dead, dying, or diseased trees; green waste; rubbish; or other flammable materials to be cleared within 30 feet of the property line and within 10 feet of each side of a highway, private road, or driveway in order to maintain defensible space (County of San Diego 2011c). The project is also required to comply with the County of San Diego Fire Service Conditions stipulated by ~~the~~ County Fire Services ~~staff~~personnel (i.e., County Fire Marshal~~l~~) upon review and approval of the project. ~~Secondly~~

Access to the park has been designed in coordination with County DPR, the County Department of Public Works, and County Fire Services personnel to ensure accommodation for large pieces of fire apparatus and horse trailers as they enter and exit. In addition, as part of project operations ~~of the project~~, signs ~~would be clearly posted containing~~with park rules and regulations ~~that~~ would be ~~enforced at the park~~clearly posted, in compliance with ~~San Diego~~ County Code of Regulatory Ordinances~~,~~ Title 4, Public Property, Division 1, Parks and Recreation, Chapter 1, County Parks and Recreation. The~~se~~ rules, which would be enforced by park employees ~~and~~, would include, but not be limited to, the following:

- Smoking ~~is~~would be prohibited.
- Campfires and open flames ~~are~~would be prohibited~~. The~~, and barbeques ~~will~~would be locked on red~~-~~-flag days. County DPR has procedures for the enforcement of "~~Open Flame Bans" that~~open flame bans," which are initiated by ~~the~~ declaration of a ~~Red Flag Warning.~~red-flag warning. County DPR would integrate signage and other interpretive stations at key site entrance points, indicating red-flag conditions when announced by fire agencies. When a warning is issued, ~~Region Managers~~region managers would reach out to the field staff and begin the process of shutting down all ~~BBQs~~barbeques by signing and banning/taping them off until the warning is lifted. Additional signage ~~is~~would be posted at park entrances and throughout the park. Park ~~staff~~personnel would patrol the park to enforce the ban.
- No person ~~is~~would be allowed to use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County park.
- Parking ~~must~~would occur in designated staging areas.

County DPR would prepare a Site Evacuation Plan as part of operational planning for the project. The Site Evacuation Plan would include emergency contact information, evacuation routes and established meeting places, and safety protocols to ensure the safe evacuation of visitors and employees of the park. County DPR would also implement the recommendations provided in the FEOA prepared by Rohde and Associates for the project, as outlined below.

~~County DPR will also implement the recommendations provided in the Fire and Emergency Operational Assessment prepared by Rohde and Associates for the project.~~ Because the project would introduce potential ignition sources to a previously undeveloped open space area, fire prevention protocols would be implemented as part of the project. The following fire prevention

protocols ~~that~~, which were recommended in the Rohde and Associates assessment, would be implemented as project design features:

- Facility Fire-Safe Design. County DPR shall design appropriate facility elements ~~of the project~~and ensure County fire and building code compliance to reduce ~~risk to~~wildfire risks for users and ~~to~~ the area~~, including fire~~. Fire-resistive ~~approved~~ landscaping~~,~~ would create a fire-safe area where the two dog parks, three soccer fields, and baseball diamond are proposed. In addition, the paved parking lot, basketball and pickleball courts, equestrian area, and other cleared areas would not only provide a buffer that ~~can serve as Temporary Safe Refuge Areas,~~would protect the park from wildfire but also provide a temporary safe refuge area with safe ingress and egress~~, and a fire-resistive equestrian facility.~~ (Rohde and Associates 2021).
- All landscape vegetation on park premises would be consistent with the guidelines of the County Department of Planning & Development Services as well as the County's approved fire-resistive landscape plant palette. Generally, these plants would:
  - Grow close to the ground;
  - Have a low sap or resin content;
  - Grow without accumulating dead branches, needles, or leaves;
  - Be easily maintained and pruned;
  - Be drought tolerant;
  - Be responsive to adequate irrigation to maintain a "green" state; and
  - Not present intense thermal outputs during combustion.
- Parking and equestrian areas would serve as emergency safe routes, providing broad expanses of non-combustible surfaces. These areas would be free of combustible ground cover and cleared of native vegetation whenever possible. Fuel modification within adjacent native vegetation may be used in coordination with development in these areas when necessary to achieve the minimum recommended fuel clearance widths. Because equestrians would most likely use County facilities as temporary safe refuge sites during wildfires, the equestrian facility would need to be designed to be both substantial and fire resistive so as to provide secure and safe housing for large animals and prevent accidental releases due to animal panicking during wildfires.

  Fuel Modification Program. County DPR shall implement a long-term fuel modification program. This management would be accomplished on a scale needed to alleviate identified fire behavior potential while limiting environmental impacts from the treatment and offering the highest protection value for the expense and effort. The goals of this fuel modification program would be to reduce wildfire intensity enough to offer reasonable protection to adjacent structural assets, limit landowner liability from wildfire damage to adjoining properties, provide protection for DPR/BCLT site development, and ensure safe public refuge at key sites. Existing fuel modification maintenance includes a 30-foot buffer of vegetation clearance along the northern frontage of South Grade Road of the County property and a 100-foot buffer of vegetation clearance and defensible space at adjoining properties along the boundary of the County-owned parcel, as directed by the Alpine FPD Defensible Space Requirements (Alpine FPD 2022). This document is attached as Appendix L. The County will specifically implement a 100-foot buffer of vegetation clearance that extends from the volunteer pad, an additional 20-foot buffer of

vegetation clearance adjoining the 30-foot buffer of vegetation clearance (total of 50-foot buffer clearance) adjacent to the roadside within the proposed park footprint, as well as a 20-foot buffer adjoining the 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel in order to reduce hazards associated with increased human-related fire ignition factors. The aggregate 50-foot vegetation clearance and 30-foot vegetation clearance also reduce an extension of wildfire from the historical wildfire corridor on the east face of the site.

- The project also shall achieve Zone A–complian~~ce~~t fuel modification around the Alpine Park facility per fire and building code requirements, with the goal of 100~~%~~ percent fire exclusion from the project site. The objective of landscape replacement in Zone A will be to eliminate the potential for wildfire occurrence through establishment of a fire-resistive landscape around principal park facilities and structures at the minimum distances required by code. This has been designed through the proposed landscape around sports fields and buildings, subject to Alpine Fire Marshal review and approval during the permitting process (Rohde and Associates 2021). Zone B fuel reduction shall occur adjacent to Zone A along property lines, where practical, and around key public facilities such as the parking areas, equestrian staging areas, and similar locations. Fuel modification in Zone B should be designed to achieve fire prevention goals while maintaining viable habitat and preserving ecological values. The objective of fuel treatment in Zone B is to achieve at least a 75 percent reduction in fire-line intensity from a wildfire moving from native fuels into a constructed fuel modification zone (Rhode and Associates 2021). The County will implement a 100-foot fuel reduction area extending from the volunteer pad under Zone A and Zone B compliance.

- Fuel Modification Criteria: A–O in FEOA (Appendix J)
  - Treatment Methods. County DPR shall implement one or more of the recommended treatment method alternatives, including:
    - Mechanical treatment, including mowing or plowing, may be used to establish fuel modification in grass where terrain is within the mechanical limits of equipment to extend parking lot or equestrian staging area clearance for safe refuge.
    - Grazing for grass and lighter fueled sites such as sage scrub in the south half or northwest quarter.
    - Hand treatment by hand crews is recommended for steep sites and sites with heavy fuels such as shrub fuel and steep-sloped areas in the northwest quarter of the combined site.
    - Spot control with herbicides. Herbicides would be used to control undesired weeds or selective vegetation within fuel modification areas.
  - Partner Collaboration for Fire Prevention. County DPR shall coordinate with neighboring entities, including BCLT, Greater Alpine Fire Safe Counsel, the Alpine FPD, San Diego County ~~Fire Authority~~FPD, CAL FIRE, County Road Department, and San Diego Gas & Electric, on regional defensible-space initiatives, fuel modification, and structural defense initiatives, including sharing of resources, planning, and costs.
  - Comply with the Regional Wildfire and Evacuation Plan~~.~~ (see Section 4.20, *Wildfire*). The San Diego County WUI Fire Emergency Response Plan has been updated for the Alpine ~~South-East~~southeast area as a part of the Rohde and Associates ~~Fire and Emergency Operational Assessment.~~FEOA (Appendix J). This document, which is also approved by the San Diego County Fire Chiefs Association and San Diego County Police Chiefs' and Sheriff's Association~~s and~~, is the County

standard emergency response and evacuation management plan format for wildfire. County DPR shall implement the project in compliance with the plan.

- Comply with Site-Specific Wildfire and Evacuation Plan. An Alpine Community Park Fire Evacuation Analysis was developed by Chen Ryan Associates (Appendix K) to assess the time required for emergency evacuation from the project site under several scenarios, assuming a wind-driven fire that results in a required evacuation affecting the project site and surrounding community. The traffic evacuation simulations presented within the analysis found that evacuation traffic generated by the project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. Evacuation flow would be able to be effectively managed.

~~Therefore, i~~Implementation of the aforementioned project design features, compliance with applicable ordinances and regulations, and enforcement of County DPR rules and regulations would reduce the potential for the project to exacerbate wildfire risks due to slope, prevailing winds, and other factors, including risks related to pollutant concentrations as a result of a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

Impact Determination

Implementation of the project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors ~~exacerbate wildfire risks of~~, and thereby would not expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Implementation of the project would not require the installation or maintenance of associated infrastructure ~~(~~, such as roads, fuel breaks, emergency water sources, power lines, or other utilities~~)~~, that may exacerbate fire risk or ~~that may~~ result in temporary or ongoing impacts on the environment.

County Park, Trails, and Open Space/Preserve

Impact Discussion

Construction

The project would ~~not~~ require the construction of infrastructure specific to wildfire protection~~,~~ (i.e., roads, fuel breaks, emergency water sources, electric~~,~~ or other utilities). ~~The~~ Furthermore, the project would ~~include~~require infrastructure improvements ~~to develop~~as the currently vacant site is developed with an active park and passive recreational facilities. The infrastructure would include~~s~~ a domestic water line, an irrigation water line, a fire service line, storm drains, sewer lines, a fire hydrant, and electricity distribution lines. Construction of the infrastructure improvements would occur during the single construction phase and would use the same construction equipment as previously listed. Construction personnel would comply with the standard construction BMPs to

avoid or minimize potential wildfire risks during construction. The other potential ~~ongoing~~ environmental impacts that could arise from construction of the project are analyzed in Sections 4.1 through 4.19 of this EIR.

Given its partial location within a VHFHSZ, the project would be required to maintain defensible space around project infrastructure, consistent with PRC Section 4291 and the Defensible Space for Fire Protection Ordinance. The County DPR would collaborate with the BCLT to construct fuel breaks on adjacent BCLT parcels. Furthermore, the County DPR and its contractors would implement BMPs for the mitigation of impacts associated with potential ignition sources while constructing the fuel breaks.

The project would also comply with all applicable CBC and CFC requirements for development in a VHFHSZ, including, but not limited to, specific requirements for structural hardening, water supply and flow, hydrant and standpipe spacing, signage, and fire department access. Therefore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risks or result in temporary or ongoing impacts on the environment.

Operation

~~Operation of the~~The project would include ~~the~~ operation of the above-mentioned utilities. Maintenance of this infrastructure would occur infrequently throughout the life of the project. Because the project would comply with PRC Section 4291, the Defensible Space for Fire Protection Ordinance, all applicable CBC and CFC requirements for development in a VHFHSZ, and the Operational Area Emergency Operations Plan, ~~the~~its potential to exacerbate wildfire risk on site would be reduced. The presence and ongoing maintenance of infrastructure on the project site would not introduce any specific conditions that would result in exacerbation of wildfire risk any more than operation of the rest of the project facilities. Additionally, the potential ongoing environmental impacts caused by operation of the project infrastructure are analyzed in Sections 4.1 through 4.19 of this EIR. Therefore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts on the environment.

Impact Determination

The project would ~~not~~ require the installation or maintenance of ~~associated~~ infrastructure ~~(~~such as roads, fuel breaks, emergency water sources, power lines, or other utilities~~) that may~~. The County DPR would collaborate with the BCLT to construct fuel breaks on the adjacent BCLT parcels. Furthermore, the County DPR and its contractors would implement standard BMPs for the mitigation of impacts associated with potential ignition sources while constructing the fuel breaks. The project would also comply with all applicable CBC and CFC requirements; therefore, implementation of project would not exacerbate fire risks or result in temporary or ongoing impacts on the environment. Impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

County Park and Trails, and Open Space/Preserve

Impact Discussion

Wildfires can greatly reduce the amount of vegetation ~~from~~on hillsides. Plant roots stabilize the soil, and above-ground plant parts slow water, allowing it to percolate into the soil. Removal of surface vegetation resulting from a wildfire reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as percolation of water into the soil profile is reduced (DeGomez 2011).

Downslope or downstream flooding, mudflows, and landslides are common in areas where steep hillsides and embankments are present and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. Additionally, increases in surface runoff and erosion are possible in a post-fire environment where surface vegetation has been removed and steep slopes can increase runoff flow velocity. As presented in Section 4.7, *Geology and Soils*, the project site is gently sloping and is underlain by erosive soils.

Construction

Construction activities for the project would involve earthwork, which would remove the ground cover and disturb surface soils, exposing loose soils and potentially increasing erosion, which could result in post-fire slope instability if a fire were to occur during construction. However, as detailed in Section 4.7, *Geology and Soils*, and Section 4.10, *Hydrology and Water Quality*, the project would be required to prepare and implement a Stormwater Pollution Prevention Plan outlining BMPs for the construction phase to prevent soil erosion and stormwater runoff, which would remove soil material from the project site and further reduce absorption. Additionally, a Stormwater Quality Management Plan would be prepared for the project site consistent with the requirements of the County of San Diego BMP Design Manual, which would contain site-specific design measures, source controls, and/or treatment control BMPs such as landscaped areas, berms, and stormwater retention basins to reduce potential pollutants, including sediment from erosion or siltation. Furthermore, development in the northernmost portion of the project site, which is the most sloped, would be minimal and would retain several groves of existing trees and areas of existing vegetation. Maintaining existing vegetation would maintain stability along the slope. Additionally, an existing dirt footpath would be protected in place and would not undergo ground-disturbing activities. The central and southern portions of the project site would involve substantial grading to support the proposed development as well as the proposed berm along the eastern side. However, the project site will still slope gradually from the north to the south. The graded areas would be revegetated with approved, native, fire-resistant species once construction is complete. Construction would alter drainage patterns on the site, but construction would also include drainage features such as culverts, storm drains, biofiltration basins, and catch basins designed to minimize stormwater runoff and erosion from the site. All of these features would reduce runoff, slope stability, and drainage changes that could potentially result in significant risks, including downslope or downstream flooding or landslides.

Operation

Operation of the project would include the development of active recreation facilities with impervious surfaces, including the equestrian staging area, parking areas, the paved walkway, courts, restrooms, and an administrati~~ve~~on building. Impervious surfaces result in more stormwater runoff than the existing natural habitat on the project site. However, the project is designed with natural vegetation surrounding the developed areas of the park and the entirety of the project site. Revegetation, as well as project design features including drainage culverts, biofiltration basins, storm drains and catch basins, would reduce runoff and erosion conditions on site. There would be no steep slopes on the project site and, where the project site consists of a gradual slope, there would be either active park facilities or vegetated open space/preserve; these features would not exacerbate conditions such as slope instability that would result in downslope or downstream flooding or landslides, or other significant risks.

Impact Determination

The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. ~~Due to~~Because of the gradual slope of the project site, the proposed design features, and implementation of construction BMPs, impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Level of Significance After Mitigation

Impacts would be less than significant.

~~4.20.6~~4.20.7 Summary of Significant Impacts

There would be no significant impacts related to wildfire.