
4.18 WILDFIRE

4.18.1 EXISTING CONDITIONS

The Project Site and nearby vicinity are susceptible to wildfires and are designated as VHFHSZs. A full description of existing wildfire-related conditions within and near the Project Site including the vegetation, topography, and weather patterns is provided in Section 4.8.1, Hazards and Hazardous Materials, of this Draft EIR.

4.18.2 REGULATORY SETTING

State

California Public Resources Code

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire prone areas.

These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC Section 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain the appropriate fire suppression equipment (PRC Section 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (PRC Section 4431).

California Green Building Standards Code

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential and nonresidential buildings (including buildings for retail, office, public schools, and hospitals) throughout California) (CBSC 2023a).

New construction in any FHSZ must comply with California Building Standards Code (CBSC) Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure. CBSC

Chapter 7A sets forth requirements pertaining to roofing; vents (covered with metal wire mesh or other materials with openings no larger than 0.125 inch); exterior coverings; floor projections; underfloor protection; exterior windows, skylights, and doors; decking; accessory structures; and use of ignition-resistant materials. (DGS 2018a).

California Fire Code

The California Fire Code, California Code of Regulations, Title 24, Part 9 includes requirements for the installation of fire sprinkler; building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. In addition, the California Fire Code addresses fire flow requirements, fire hydrant spacing, and access road specifications.

California Fire Code Chapter 49, Requirements for Wildland-Urban Interface Fire Areas, sets forth requirements for hazardous vegetation and fuel management and defensible space and requires compliance with construction methods mandated in CBSC Chapter 7A (CBSC 2022a).

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the California Governor's Office of Emergency Services, which coordinates the responses of other agencies. The Orange County Emergency Management Division provides emergency management and preparedness services coordinates response to emergencies to the unincorporated areas of Orange County and supports the efforts of the Orange County Operational Area. ""

Local

City of Anaheim General Plan – Safety Element

The Safety Element of the City of Anaheim General Plan addresses fire hazards, geologic and seismic hazards, flood hazards, risk-reduction strategies, hazard abatement measures, and potential hazard locations throughout the City (Anaheim 2023a). An analysis of Project consistency with the goals and policies from the Safety Element that are related to hazards and hazardous materials and that are applicable to this analysis are provided in Table 4.10-1 in Section 4.10, Land Use.

4.18.3 THRESHOLDS OF SIGNIFICANCE

In accordance with the City of Anaheim's Environmental Checklist, the Project would result in a significant wildfire impact if it is located in or near state responsibility areas or lands classified as VHFHSZs, and would:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d) 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 change?

4.18.4 IMPACT ANALYSIS

- a) *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b) *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

Less Than Significant With Mitigation Incorporated. The Project would result in an anticipated population increase of approximately 1,664 new City residents and new structures within the Project Site. The Project Site is located within a VHFHSZ and is prone to wildfire based on topography, fuels, and meteorological patterns affecting the Project Site as discussed in response to threshold (g) in Section 4.8, Hazards and Hazardous Materials. Therefore, the Project would expose additional people and structures to wildfire hazards and secondary effects when compared to existing conditions.

As detailed in the response to threshold (f) in Section 4.8, Hazards and Hazardous Materials, the Project would incorporate numerous design features that would help reduce fire risk, increase emergency access, and increase wildfire resilience with respect to the Project Site and surrounding neighborhoods. Moreover, the Project would be required to adhere to all applicable laws and regulations as well as plans and programs, including those set forth in the Building, Fire and CALGreen Codes, the General Plan, the Municipal Code, the City's Emergency Operations Plan, the Be Ready Anaheim plan, and the City's Know Your Way initiative. In addition, the Project would be required to implement **MM HAZ-4**, **MM HAZ-5**, and **MM HAZ-9**.

As required by **MM HAZ-4**, the Project would minimize potential effects to local circulation and to emergency response times and to evacuation through the preparation and implementation of an approved Construction Management Plan that would, among other things, specify the methods by which traffic would be maintained along Santa Ana Canyon Road and other local roads throughout the Project's construction process.

To improve the City's ability to more effectively manage traffic along Santa Ana Canyon Road during a future evacuation, the Project would be required to implement **MM HAZ-5**, which requires that prior to issuance of a certificate of occupancy for the first multiple-family residential unit, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, S. Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road.

As required by **MM HAZ-9**, prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of "Know Your Way" evacuation planning and protocols. The community education and outreach for the larger eastern portion of the City would help to improve the Community's understanding of "Know Your Way", which will better facilitate more efficient and safer future evacuation events.

See also the detailed discussion in Section 4.8, Hazards and Hazardous Materials, of this Draft EIR for additional analysis in this regard.

Based on the forgoing and with implementation of **MM HAZ-4**, **MM HAZ-5**, and **MM HAZ-9**, the Project would result in a less than significant impact related to these thresholds.

- c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project require installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

Less Than Significant Impact. The Project includes the installation and maintenance of infrastructure, including roads within the Project Site, as well as wet and dry utilities within the Project Site and within the existing, developed portions of Santa Ana Canyon Road just north of the Project Site. These improvements have no features about them that would substantially exacerbate wildfire risks during construction, operation, or ongoing maintenance. Electrical and gas lines serving the Project would be underground and within proposed and existing roadway rights-of-way. Moreover, as noted above, the Project would incorporate numerous design features that would help reduce fire risk, increase emergency access, and increase wildfire resilience with respect to the Project Site and surrounding neighborhoods. In addition, the Project would be required to adhere to all applicable laws and regulations as well as plans and programs, including those set forth in the Building, Fire

and CALGreen Codes, the General Plan, the Municipal Code, the City's Emergency Operations Plan, the Be Ready Anaheim plan, and the City's Know Your Way initiative.

See also the detailed discussion in Section 4.8, Hazards and Hazardous Materials, of this Draft EIR for additional analysis in this regard.

Therefore, based on the foregoing, the Project would result in a less than significant impact related to this threshold and no mitigation is required.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage change?

Less Than Significant Impact. The Project Site is located upslope and directly adjacent to Santa Ana Canyon Road, which is an important arterial roadway.

Downslope or Downstream Flooding

The Project would include drainage improvements to capture and convey stormwater flows that would be designed to comply with all applicable requirements and standards, which would minimize the potential for flooding downslope of the Project Site following a wildfire event. More information and analysis on the Project's effects related to hydrology and water quality are provided in Section 4.9 of this Draft EIR; see also Section 4.6, Geology and Soils.

Downslope or Downstream Landslides

As part of the CEQA process for the Project, a Geotechnical Report that included an evaluation of landslide susceptibility in the Project Site was prepared and considered (see attached Appendix I). The State Zones of Required Investigation Map indicates portions of the slopes within the Project Site are mapped as having potential for earthquake-induced landslide hazard. Review of CGS Landslide Inventory reports indicate the western and northern facing slopes have a high landslide susceptibility and are considered unstable in place (CGS 2023c). The potential instability is primarily a result of adverse geologic structure and bedding in the formational materials.

The Project would include grading and the installation of retaining walls to accommodate the proposed buildings and related Project improvements. Implementation of the Project's approved grading plan, which would be required to adhere to all applicable laws and regulations, would result in stabilized slopes that would not present any significant hazards to any existing or proposed buildings due to landslides in the event of a wildfire event.

The Project's proposed buildings would be designed in accordance with all applicable requirements and standards, including provisions of the California Green Building Standards Code, which contains stringent standards regulating the design and construction of excavations, foundations, retaining walls, and other building elements to control the effects of seismic ground shaking and adverse soil conditions. Project implementation would also be required to comply with the recommendations outlined in the Geotechnical Investigation

Report prepared for the Project. Based on the Geotechnical Investigation Report, the Project is geotechnically feasible provided that the recommendations in the report are reviewed and integrated in the context of the final Project design and are incorporated during the Project's construction phase.

Slope stability evaluations are included in the Geotechnical Investigation Report and provide design procedures for global and surficial stability to avoid significant damage to proposed structures from landslides or slope instability. Slope instability at the Project Site can be properly addressed with ground anchor retaining walls and a buttress fill, as specified by the Geotechnical Investigation Report (Group Delta 2023a). Compliance with the applicable laws and regulations, and adherence to the proper grading, design, and building construction methods specified in the Geotechnical Investigation Report would avoid and/or minimize, to the extent feasible, potential impacts related to landslides. In addition, the Project would be required to adhere to all other applicable federal and State laws and regulations, programs, and standards, including those set forth in the NEHRP, Alquist-Priolo Earthquake Zoning Act, SHMA, and the CBC. Furthermore, the Project would be required to adhere to applicable goals and policies in the General Plan including, among others, those set forth in the Green Element and the Safety Element, and applicable provisions of the Municipal Code, Title 9, Chapter 9. Adherence to the foregoing laws, regulations, and programs and standards would ensure that impacts with respect to landslides would be minimized.

See also Section 4.6, Geology and Soils, of this Draft EIR for additional information and analysis in this regard.

Post-Fire Slope Instability and Drainage Change

Highly combustible vegetation would be removed from all development footprints within the Project Site, which would have a significant amount of increased impervious surface in order to implement the Project. In doing so, this would help to reduce wildfire risk.

Nevertheless, given the significant open space component of the Project, much of the existing vegetation within the Project Site would remain with implementation of the Project, which has the potential to act as fuel during a wildfire event. A great deal of this vegetation that would remain is located on slopes that lead down to the proposed developed area of the Project Site. However, Anaheim Fire & Rescue has Brush Clearance and Vegetative Growth Guidelines, as well as Fuel Modification Plans and Maintenance Specifications and Requirements, as discussed above in the Regulatory Setting section. These documents provide best management practices for maintenance of brush and vegetation, as well as fuel modification design, installation, and maintenance that can reduce risk of wildfire, for which the Project would be required to comply. If a fire event were to occur on these slopes, it is possible that erosion and sedimentation could occur in rain events that would follow. If this were to occur it is reasonably foreseeable that the Property Owner/Developer would clean and maintain all catch basins and other drainage facilities to ensure their proper operation to minimize the potential for downslope flooding as part of standard maintenance typical of this type of mixed-use development. In doing so, this would help alleviate concerns regarding any potential slope instability and drainage change due to a wildfire event.

Also, see Section 4.8, Hazards and Hazardous Materials, of this Draft EIR for additional information and analysis in this regard.

Conclusion

Therefore, based on the foregoing, the Project would result in a less than significant impact related to this threshold and no mitigation is required.

4.18.5 CUMULATIVE IMPACTS

Projects considered in the cumulative impact analysis consist of eight projects within the City of Anaheim. These related projects are described in more detail in Table 4-1, Cumulative Projects List, which is provided in Section 4.0.

The Project, along with other cumulative development, could increase the potential exposure of persons or the environment to hazards and hazardous materials, including common hazardous materials that would be used in the construction and operation of same; however, the use, transport, storage, and disposal of hazardous materials are regulated by numerous federal, State, and local laws and regulations including, but not limited to those set forth in or otherwise governed by the comprehensive regulatory framework detailed above, as well as applicable goals and policies of the General Plan, the Municipal Code, the City's Emergency Operations Plan, Be Ready plan, and Know the Way initiative (among others).

Furthermore, similar to the Project, other cumulative projects would be required to mitigate, to the extent necessary, any significant impacts in this regard on a project-by-project basis. With respect to potential impacts associated with impairment of or physical interference with an adopted emergency response plan or emergency evacuation plan, the Project, as well as other cumulative projects, would be required to adhere to applicable federal, State, and local laws and regulations, including, but not limited to applicable goals and policies of the General Plan, the Municipal Code, the Emergency Operations Plan, the Be Ready plan and the Know the Way initiative. Regarding potential impacts associated with wildland fires, while the Project Site and vicinity is in an area of high threat to people and structures from wildland fire, each development would be required to mitigate such risks to the extent feasible on a project-by-project basis, similar to the above-described mitigation for the Project. In doing so, this could help reduce combustible fuel loads, harden structures, increase access roadways, and otherwise enhance wildfire resilience. In addition, cumulative development would be required to adhere to applicable federal, State, and local laws and regulations, including, but not limited to applicable goals and policies of the General Plan, as well as applicable provisions in the Municipal Code and Fire and Building Codes.

To avoid potential effects related to known hazardous materials sites and contaminated soils, it is reasonably foreseeable that lead agencies for each of the cumulative projects would require the developer for each of these projects provide a Phase I Environmental Site Assessment or similar documentation that provides evaluation of hazardous waste sites nearby and which recommend additional studies and/or remediation that may be needed on each of these cumulative project sites. Therefore, with implementation of standard

environmental review of each of these projects, less than significant impacts would result related to known hazardous materials sites.

None of the cumulative projects are located with an airport land use plan or within two miles of a public airport or a public use airport. Therefore, none of the cumulative projects have the potential to result in a safety hazard or in excessive noise for people residing or working in the Project Site or vicinity.

Particularly with respect to cumulative impacts associated with emergency access and evacuation, there are two cumulative projects that have the potential to increase evacuation traffic on Santa Ana Canyon Road, which are discussed below.

DEV2023-00043 consists of a project that would include approximately 450 multiple-family residential units within the Anaheim Hills Festival Specific Plan area. This project site is currently developed as a movie theater; therefore, the existing land use generates some demand for emergency evacuation routes. Using a 2.5 car per unit assumption, which is the same as was used in the Project's Evacuation Travel Time Analysis report, this cumulative project could result in up to approximately 1,125 additional cars needing to evacuate the area during an emergency, which does not account for existing traffic/people on-site associated with the movie theater use. This cumulative project is near the center of the Anaheim Hills Festival shopping center and distant from natural open space areas, and is assumed to evacuate eastbound in the event of a wildfire event, while the Proposed Project would evacuate westbound, which is consistent with Know Your Way. Therefore, this cumulative project would not substantially add to evacuation travel time for individuals in the Project Site or in evacuation zones 8, 9, 10, or 13.

DEV2020-00204 consists of a project that would include a 180-acre cemetery just east of Gypsum Canyon Road and Santa Ana Canyon Road. This project site is currently undeveloped and it therefore does not result in any evacuation demand. This cumulative project would result in visitors and employees at the cemetery site throughout each day of the week. Therefore, this project would increase demands for evacuation routes above existing conditions. Know Your Way does not cover this far east within the City of Anaheim; however, it is unlikely that users of the cemetery site would compete for evacuation routes with individuals coming from the Project Site or from other cumulative project sites given the proposed cemetery's location near the intersection of Gypsum Canyon Road and Santa Ana Canyon Road. During an evacuation event, it is likely that individuals would evacuate the cemetery by going north on Gypsum Canyon Road, then westbound on SR-91. Therefore, this cumulative project would not substantially add to evacuation travel time for individuals in the Project Site or in evacuation zones 8, 9, 10, or 13.

Except for DEV2020-00204, the cemetery project, the cumulative projects would not occur on project sites that are particularly prone to wildfire hazards. Therefore, based on the foregoing reasons, these cumulative projects would generally not result in a substantial direct fire risk to people, property, or structures. DEV2020-00204 would be required to develop any proposed structures using urban wildland interface best practices. Also, DEV2020-00204 would be required to implement fuel modification zones and other measures to minimize potential wildfire risk. Collectively, DEV2020-00204, other

cumulative developments and the Project would increase demand for fire protection from Anaheim Fire and Rescue during a future wildfire event; however, through coordination with Anaheim Fire and Rescue staff the Project's increased demand on fire department resources has been evaluated and was confirmed to not be significant. This conclusion is further supported by the above-described considerations.

Therefore, for the foregoing reasons, there would be less than significant cumulative impacts with respect to hazards and hazardous materials.

The Project would be required to implement identified mitigation to reduce impacts associated with hazardous materials, which would help to ensure that any such hazardous materials are not allowed to migrate off-site and combine with other hazardous materials handling operations. Furthermore, similar to the other cumulative developments, the Project would be required to adhere to all applicable laws, regulations, plans and policies, which would further ensure impacts in this regard are less than significant. As described above, development of the Project could increase the potential exposure of persons to hazardous materials, including hazardous building materials; however, the use, storage, and disposal of hazardous materials are regulated by various federal, State, and local laws and regulations including those described in detail above. Furthermore, the Project would be required to adhere to numerous mitigation measures and otherwise ensure compliance with all applicable laws and regulations governing hazards and hazardous materials. Moreover, the Project would be required to implement the above-described numerous design features and proactive planning and management tools intended to enhance wildfire resilience, increase safety and reduce risk to both persons and structures in the event of fire. In particular, these features, mitigation measures and programs, along with compliance with all applicable laws and regulations, would ensure that the Project would not make a cumulatively considerable contribution to this already less than significant cumulative impact, including, without limitation, those related to evacuation and emergency access.

4.18.6 MITIGATION PROGRAM

See Section 4.8, Hazards and Hazardous Materials, for mitigation measures referenced in this section.

4.18.7 SIGNIFICANCE AFTER MITIGATION

With implementation of **MM HAZ-4**, **MM HAZ-5**, and **MM HAZ-9**, the Project would result in a less than significant impact related to wildfire.

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