

4.12 Wildfire

This section describes existing conditions pertaining to wildfire, identifies associated regulatory requirements, evaluates potential project and cumulative impacts, and identifies mitigation measures for any significant or potentially significant impacts related to implementation of the proposed Newell Creek Pipeline (NCP) Improvement Project (Proposed Project). This analysis is based on a review of fire hazard severity zone maps and existing studies. Emergency response and evacuation issues are addressed in Section 4.11, Transportation.

A summary of the comments received during the scoping period for this environmental impact report (EIR) is provided in Table 2-1 in Chapter 2, Introduction, and a complete list of comments is provided in Appendix A. There were no comments related to wildfire.

4.12.1 Existing Conditions

4.12.1.1 Background

Wildfire has shaped California’s ecosystems for millennia, recurring at varying intervals in virtually all of the state’s vegetation types. Before Euro-American settlement, an estimated 4.5 to 12 million acres burned annually across the state. Natural fire regimes have changed dramatically due to land management practices and a century of effective fire suppression, which, in conjunction with climate change and expanding development, have led to increased wildfire impacts on ecosystems and people (California Department of Forestry and Fire Protection [CAL FIRE] 2018).

A wildfire is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. Various factors contribute to the intensity and spread of wildfires: humidity, wind speed and direction, vegetation type, the amount of vegetation (i.e., fuel), and topography. While wildfires are a natural component of California’s fire-adapted ecosystems, they represent a hazard where development is adjacent to open space or within close proximity to wildland fuels or designated fire severity zones. 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.

The wildland-urban interface (WUI), defined as the areas where urban development is located in proximity to undeveloped open space or “wildland” areas, has expanded rapidly in recent decades, with extensive residential development occurring in the fringes of metropolitan areas and in rural areas with attractive recreational and aesthetic amenities. This pattern of development has implications for wildfire management and impact, as fire risk and damage potential are elevated in the WUI due to the abundance of both fuel and ignition sources. The increased number of homes and proximity to flammable landscapes can be a potentially dangerous situation in the event of a fire; fires that occur in the WUI pose the greatest risk to life and property.

The impacts of wildfire on a community are far-reaching. The most significant impacts would be loss of life, loss of property, and environmental damage. Air quality is also a major issue, which can force the closure of schools and businesses as well as limit human activity. Damage to infrastructure such as culverts, roads and bridges can be difficult to locate and repair in a timely manner. During the rainy season, burned-over areas are subject to mud slides and debris torrents which can be exacerbated by infrastructure damage. Sedimentation

due to winter rains after fire events can destroy fish habitats, which can have a catastrophic effect on the ecosystem (County of Santa Cruz 2015).

CAL FIRE has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). These areas are referred to as Fire Hazard Severity Zones (FHSZs) and are identified for Federal Responsibility Areas (FRAs), where federal agencies have responsibility for wildfire protection, State Responsibility Areas (SRAs), where CAL FIRE has responsibility for wildfire protection, and Local Responsibility Areas (LRAs), where local fire protection agencies have responsibility for wildfire protection. Different FHSZs (moderate, high, and very high) are based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. The speed and intensity of potential fires within the area, ability of embers to spread and multiply, loading of fuel, topographic conditions, and local climate all culminate to form the fire hazard severity for an area. Very high FHSZs are areas lacking adequate wildland and structural fire protection.

4.12.1.2 Wildfire Risk

The risk of significant wildfire exists in Santa Cruz County. Due to local topography, fuels (forest, chaparral, grasslands) and certain weather conditions, Santa Cruz County is prone to periodic large wildfire events. Annual cycles of elevated fire danger occur throughout the county, with the wildfire season typically extending from roughly May into late October or early November. Widespread densely forested areas with high fuel loading, chaparral, and grasslands contribute to danger from wildfire. Effective fire suppression and a lack of vegetation management over the last century have led to uncharacteristically high fuel loads. Vegetation in the county is dominated by dense second-growth redwood and mixed conifer forests typically having forest floor accumulations of litter and downed woody material and coastal scrub communities consisting of low vegetation up to 6 feet in height, typically occurring on coastal bluffs, coastal hills, and wind-swept summits. Scrub vegetation is usually dense and difficult to penetrate.

The boundary between residential/commercial development and wildland in the county is not clearly demarcated, and , and the county has substantial area in the WUI where wildfire risks are elevated (CAL FIRE San Mateo-Santa Cruz Unit [CZU] 2018). Due to the county's unique and diverse geography and microclimates suitable for vegetation to flourish, plus urban areas adjacent to—or integrated into—this dense vegetation, the county has substantial area in the WUI, where wildfire risks are elevated, and in high or very high FHSZs (Santa Cruz County Grand Jury 2020). The county has the largest percentage of WUI of all the counties in the State of California. Over 50% of the county's population lives in the WUI, encompassing a total of 167,442 residents and 71,855 homes (Santa Cruz County Civil Grand Jury 2020).

4.12.1.3 Wildfire Incidents

Each year, state, local, and volunteer departments throughout the region respond to numerous wildfires. The vast majority of these are held to less than one acre in size. The reasons for this include, but are not limited to: early identification and reporting, large fire suppression response (both local and state agencies), generally good access to fire areas, favorable fuels, favorable fire weather, and air support. However, when ignitions occur during unfavorable weather and/or in areas with poor access, fires can rapidly increase to an unmanageable size prior to fire resources arrival (CAL FIRE CZU 2018).

In 2008, the county experienced three large wildfires resulting in approximately 5,400 acres burned and numerous homes destroyed. In 2009, Santa Cruz County experienced two large wildfires resulting in approximately 8,500 acres damaging and destroying numerous homes and structures. In 2016, the Loma Fire burned 4,500 acres along the crest of the Santa Cruz Mountains adjacent to the Santa Clara/Santa Cruz county line. In 2017, the Bear Fire burned under 400 acres, destroyed seven structures and threatened hundreds in communities adjacent to Castle Rock State Park (CAL FIRE CZU 2018). Most recently, the CZU Lightning Complex fires of 2020 consisted of at least 22 lightning-induced wildfires, from Highway 9 north of Ben Lomond to the Pacific coastline. The fire burned over 86,000 acres in Santa Cruz and San Mateo counties and destroyed 1,490 structures (CAL FIRE 2020).

4.12.1.4 Fire Protection

Fire protection in California is the responsibility of the federal, state, or local government. Fire protection in LRAs is provided by the County, a city, or a designated fire protection district. Within SRAs, fire protection is provided by CAL FIRE. In general, SRA includes forest-covered lands, whether of commercial value or not, or brush or grass-covered lands and does not include lands within city boundaries or in federal ownership (County of Santa Cruz 2015). In FRAs, fire protection is the responsibility of the federal government. Figure 4.12-1 shows the FRA, SRA, and LRA within Santa Cruz County. Most of the unincorporated area of the county is within the SRA, while the LRA includes the county's incorporated cities.

The County is served by 10 local fire protection districts, while the larger unincorporated areas of the County not covered by a special district are served by the Santa Cruz County Fire Department (SCCFD) in conjunction with CAL FIRE. Fire agencies have mutual aid agreements which enable them to help one another across jurisdictional boundaries when emergencies exceed local resources. Mutual aid is usually requested on an as-needed basis by the local incident commander. Mutual aid is typically voluntary, and may not occur if the requested agencies are dealing with incidents of their own and/or do not have enough equipment or firefighters to share at the time (Santa Cruz County Grand Jury 2020).

4.12.1.5 Wildfire Hazards in the Vicinity of Proposed Project

The Proposed Project pipeline alignment is within a moderate to high fire hazard severity zone (see Figure 4.12-1). Most of the northern segment of the proposed pipeline is within a moderate fire hazard severity zone, whereas much of the Graham Hill Road North pipe section of the southern segment is within a high fire hazard severity zone. Although most of the Project alignment is within a SRA, the southern portion of Graham Hill Road forms a boundary between a SRA on the west side of the road and a LRA, Unincorporated, on the east side of the road. Both sides of the road in this area are classified as moderate fire hazard severity zones (CAL FIRE 2007, County of Santa Cruz 2021). In addition to CAL FIRE's FHSZ mapping, the County of Santa Cruz also has mapped critical and mitigatable wildfire hazard areas due to accumulation of wildfire prone vegetation, steep and dry slopes, and the presence of structures vulnerable to wildland fires. These areas are generally situated in the steeper higher elevations of the County (County of Santa Cruz 2015), and are within the state-mapped hazard areas.

Portions of the pipeline route are also within local fire protection districts, including the Ben Lomond Fire Protection District, Felton Fire Protection District, Scotts Valley Fire District, and Zayante Fire Protection District.

In addition, the LRA on the east side of the southern portion of the Graham Hill Road pipe section is within the jurisdiction of the Santa Cruz County Fire Department.

4.12.2 Regulatory Framework

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 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 measures are required to protect against structural fires. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, IFC employs a permit system based on hazard classification. The IFC is updated every three years.

4.12.2.1 Federal

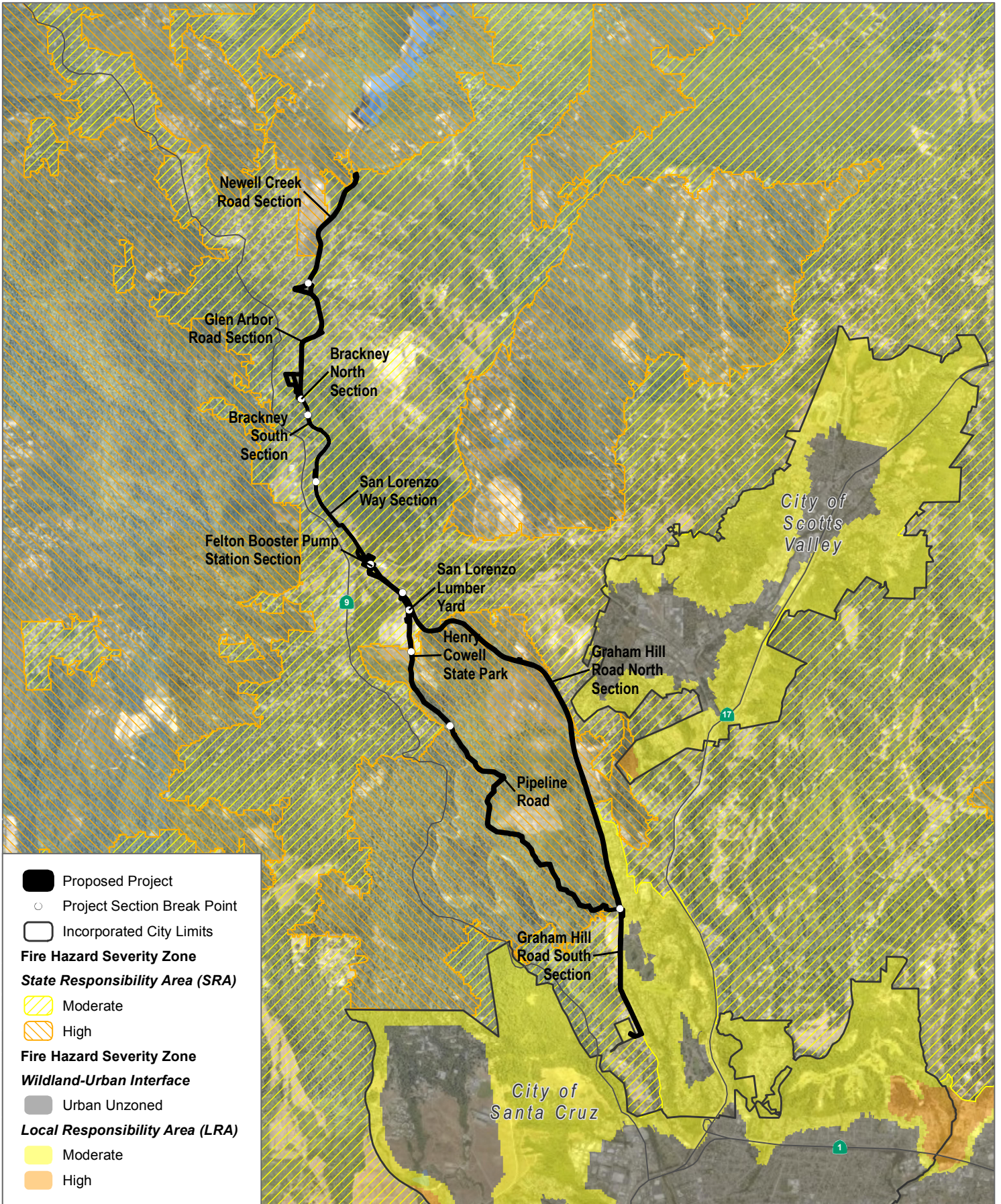
Federal Wildland Fire Management Policy

The Federal Wildland Fire Management Policy was developed in 1995 and updated in 2001 by the National Wildfire Coordinating Group, a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. An important component of the Federal Wildland Fire Management Policy is the acknowledgment of the essential role of fire in maintaining natural ecosystems.

National Fire Plan

The National Fire Plan was a Presidential directive in 2000 as a response to severe wildfires that had burned throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural communities and assurance for sufficient firefighting capacity in the future. It is a long-term investment that will help protect natural resources in addition to communities, as well as a long-term commitment based on cooperation and communication among federal agencies, states, local governments, tribes, and interested members of the public. There are five key areas addressed under the National Fire Plan:

- Firefighting and Preparedness
- Rehabilitation and Restoration
- Hazardous Fuels Reduction
- Community Assistance
- Accountability



- Proposed Project
- Project Section Break Point
- Incorporated City Limits
- Fire Hazard Severity Zone**
- State Responsibility Area (SRA)**
- Moderate
- High
- Fire Hazard Severity Zone**
- Wildland-Urban Interface**
- Urban Unzoned
- Local Responsibility Area (LRA)**
- Moderate
- High

SOURCE: ESRI Imagry 2021, CAL FIRE 2020, Santa Cruz County 2021

FIGURE 4.12-1

Project Fire Hazard Zones

Newell Creek Pipeline Improvement Project

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Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003 by FEMA, is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

4.12.2.2 State

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 nearly 6,000 wildland fires that burn over 260,000 acres each year (CAL FIRE 2019). CAL FIRE is responsible for the protection of approximately 31 million acres of private land within the state and, at the local level, is responsible for inspecting defensible space around private residences. CAL FIRE is also responsible for enforcing State of California fire safety codes included in the California Code of Regulations and California Public Resources Codes (discussed further below).

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; by controlling substances and products which may, in and of themselves, or by their misuse, cause injuries, death, and destruction by fire; by providing statewide direction for fire prevention in wildland areas; by regulating hazardous liquid pipelines; by reviewing regulations and building standards; and by providing training and education in fire protection methods and responsibilities.

The Board of Forestry and Fire Protection (Board) is a government-appointed body within the CAL FIRE. It is responsible for developing the general forest policy of the state, determining the guidance policies of the CAL FIRE, and representing the state's interest in federal forestland in California. Together, the Board and the CAL FIRE work to carry out the California Legislature's mandate to protect and enhance the state's unique forest and wildland resources.

The Board is charged with protecting all wildland forest resources in California that are not under federal jurisdiction. These resources include major commercial and non-commercial stands of timber, areas reserved for parks and recreation, woodlands, brush-range watersheds, and all private and state lands that contribute to California's forest resource wealth.

CAL FIRE 2018 Strategic Fire Plan

Public Resources Code Sections 4114 and 4130 authorize the State Board of Forestry to establish a fire plan (The 2018 Strategic Fire Plan for California) that establishes the levels of statewide fire protection services. These levels of service recognize other fire protection resources at the federal and local level that collectively provide a regional and statewide emergency response capability. In addition, California’s integrated mutual aid fire protection system provides fire protection services through automatic and mutual aid agreements for fire incidents across all ownerships. The California Fire Plan is the state’s road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and to contribute to ecosystem health.

The Board has adopted these Strategic Fire Plans for California since the 1930s and periodically updates them to reflect current and anticipated needs of California’s wildland. The Strategic Fire Plan is the state’s road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The Strategic Fire Plan is adopted to better respond to the changes of the environmental, social, and economic landscape of California’s wildlands and to provide CAL FIRE with appropriate guidance for adequate statewide fire protection of state responsibility areas. The latest Strategic Fire Plan is dated August 22, 2018.

CAL FIRE implements and enforces the Board’s policies and regulations. The 2018 Strategic Fire Plan reflects CAL FIRE’s focus on (1) fire prevention and suppression activities to protect lives, property, and ecosystem services, and (2) natural resource management to maintain the state’s forests as a resilient carbon sink to meet California’s climate change goals and to serve as important habitat for adaptation and mitigation.

State Fire Regulations

Fire regulations for California are established in Sections 13000 et seq. of the California Health and Safety Code and include regulations for structural standards (similar to those identified in the California Building Code), fire protection and public notification systems, fire protection devices such as extinguishers and smoke alarms, standards for high-rise structures and childcare facilities, and fire suppression training. The State Fire Marshal is responsible for enforcement of these established regulations and building standards for all state-owned buildings, state-occupied buildings, and state institutions within California.

Emergency Response 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 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 California Natural Disaster Assistance Act is activated after a local declaration of emergency and the California Emergency Management

Agency gives concurrence with the local declaration, or the governor issues a proclamation of a state emergency. Once the act is activated, local government is eligible for certain types of assistance, depending on the specific declaration or proclamation issued.

4.12.2.3 Local

CAL FIRE San Mateo – Santa Cruz Unit Strategic Fire Plan

CAL FIRE requires counties to develop fire protection management plans that address potential threats of wildland fires. The CAL FIRE San Mateo – Santa Cruz Unit (CZU), which is the County Fire Department for both San Mateo County and Santa Cruz County, adopted the 2019 Strategic Fire Plan for the San Mateo County and Santa Cruz County unit in May 2019. The plan is a planning and assessment tool that identifies and prioritizes pre-fire and post-fire management strategies and tactics meant to reduce the loss of values at risk within the Unit.

County of Santa Cruz Local Hazard Mitigation Plan

The County Local Hazard Mitigation Plan also designates critical hazard areas of the county as areas subject to greater threat from wildfire, and identifies these areas based on slope, vegetation, ability to respond to fire threats, and localized weather conditions in order to assist with preparation of County hazard mitigation and response planning. Its purpose is to identify and characterize hazards, and to identify and prioritize the mitigation activities. The plan was last updated in September 2015.

Santa Cruz – San Mateo Community Wildfire Protection Plan

Community Wildfire Protection Plans (CWPPs) are authorized and defined in Title 1 of the Healthy Forests Restoration Act (HRFA) of 2003. The Santa Cruz County San Mateo County Community Wildfire Protection Plan (CWPP) identifies the risks and hazards associated with wildland fires in the WUI areas of San Mateo and Santa Cruz counties. The plan also identifies recommendations aimed at preventing and reducing both infrastructure and ecosystem damage associated with wildland fires. The plan documents suggested actions intended to reduce the risk to people, property and the environment. Fuel reduction projects identified in an approved CWPP receive priority for federal funds.

4.12.3 Impacts and Mitigation Measures

This section contains the evaluation of potential environmental impacts associated with the Proposed Project related to hazards and hazardous materials. The section identifies the thresholds of significance used in evaluating the impacts, describes the methods used in conducting the analysis, and evaluates the Proposed Project's impacts and contribution to significant cumulative impacts, if any are identified. Mitigation measures are presented for identified significant or potentially significant impacts, and the level of significance with mitigation also is identified.

4.12.3.1 Thresholds of Significance

The thresholds of significance used to evaluate the impacts of the Proposed Project related to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines, as listed below. A significant impact would occur if the Proposed Project would:

- A. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.
- 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 the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- 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 changes.

4.12.3.2 Analytical Methods

This impact analysis based on review of existing fire hazard maps and review of the Proposed Project components.

Application of Relevant Standard Construction Practices

The City has adopted standard construction practices (see Section 3.6.6, Standard Construction Practices) that would be implemented by the City or its contractors during construction to avoid or minimize effects of wildfire. These practices and their effectiveness in avoiding and minimizing effects are described below.

Related to fire prevention, the Proposed Project includes Standard Construction Practice #16, which regulates construction equipment engines to prevent sparks, requires fire suppression equipment, and restricts construction activities during red flag warnings issued by CALFIRE.

Impacts have been evaluated with respect to the thresholds of significance, as described above. In the event adverse environmental impacts would occur even with consideration of applicable policies and regulations and Proposed Project Standard Construction Practices described in Chapter 3, Project Description, if applicable, impacts would be potentially significant, and mitigation measures are provided to reduce impacts to less-than-significant levels.

4.12.3.3 Project Impact Analysis

Impact WIL-1: Wildfire Hazards (Significance Thresholds A, B, C, and D). The Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. **(Less than Significant)**

As discussed in Section 4.12.1, the proposed pipeline alignment is within a moderate to high fire hazard severity zone (see Figure 4.12-1). Most of the northern segment of the proposed pipeline is within a moderate fire hazard severity zone, whereas much of the Graham Hill Road North section of the southern segment is within a high fire hazard severity zone. Although most of the Proposed Project alignment is within an SRA, the southern portion of Graham Hill Road forms a boundary between a SRA on the west side of the road and a LRA, Unincorporated, on the east side of the road. Both sides of the road in this area are classified as moderate fire hazard severity zones.

Construction and operation of the Proposed Project would not include construction of habitable structures that could expose people or structures to wildfire. The Proposed Project consists of installation of an underground pipeline. Project construction could include the use of welding equipment, torching, generators, chainsaws, and chippers, all of which could produce sparks and potentially put nearby residences and wildland area at risk of fire. However, with implementation of the Proposed Project Standard Construction Practices, as described above and in Section 3.6.6, Standard Construction Practices, fire safety measures for operating equipment would be implemented during construction. Spark arrestors would be required for internal combustion engine equipment, fire suppression equipment would be required on site during use of such mechanical equipment, and construction activities would not be conducted during high fire hazard periods (i.e., red flag warnings)¹ unless adequate fire protection measures are implemented in compliance with federal, state, and local fire prevention and protection regulations and guidance. Fire safety measures will be detailed in a Fire Safety Program for the project. Fire suppression equipment at the construction sites would include items such as fire extinguishers and shovels. Therefore, the Proposed Project would not result in conditions that would expose people or structures to significant risk of loss, injury or death involving wildland fires or exacerbate wildfire risks. The Proposed Project would not expose people to pollutant concentrations from a wildfire as the Proposed Project would not generate new homes or occupants.

Upon completion of construction, the underground pipeline would be buried and disturbed areas would be repaved and/or revegetated. Therefore, the Project would not exacerbate wildfire risks or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Furthermore, the Proposed Project does not involve grading or construction that would increase risks of downslope or downstream flooding or landslides that could lead to post-fire slope instability. Upon completion of construction, the Project would consist of an underground pipeline. The Project does not require the installation or maintenance of infrastructure to support the proposed replacement of an existing raw water line, such as roads, fuel breaks, emergency water sources, or power lines that would exacerbate fire risk. For these reasons, impacts would be *less than significant*.

¹ Red flag warnings and fire weather watches are issued by CAL FIRE based on weather patterns (low humidity, strong winds, dry fuels, etc.) and listed on their website (<https://www.fire.ca.gov/programs/communications/red-flag-warnings-fire-weather-watches/>).

4.12.3.4 Cumulative Impacts Analysis

This section provides an evaluation of cumulative wildfire impacts associated with the Proposed Project and past, present, and reasonably foreseeable future projects, as identified in Table 4.0-1 in Section 4.0, Introduction to Analyses, and as relevant to this topic. The geographic area for the analysis of cumulative impacts is described below.

The geographic area for the analysis of cumulative impacts related to wildfire consists of the proposed pipeline alignment and areas in proximity to the alignment because impacts related to such hazards depend on the specific conditions on the particular project site and its immediate vicinity. Generally, these site-specific impacts would not combine with one another to create cumulative impacts, unless the cumulative development sites overlapped or were immediately adjacent to one another. The known cumulative projects planned within the geographic area of analysis for cumulative impacts related to wildfire include: the Newell Creek Dam Inlet/Outlet Replacement Project; the Graham Hill Water Treatment Plant (GHWTP) Concrete Tanks Project; the GHWTP Facility Improvement Project; and several County bridge replacement projects (see Table 4.0-1 in Section 4.0, Introduction to Analyses).

Impact WIL-2: Cumulative Wildfire Impacts (Significance Thresholds A-D). The Proposed Project, in combination with past, present, and reasonably foreseeable future development, would not result in a significant cumulative impact related to significant risk of loss, injury, or death involving wildland fires. *(Less than Significant)*

The only cumulative projects with an overlap of construction schedules are two improvement projects at the GHWTP (Concrete Tanks Project and Facility Improvement Project). Other cumulative projects using roads within the Proposed Project construction areas would be completed before Proposed Project construction begins (Newell Creek Dam Inlet/Outlet Improvement Project and San Lorenzo Way Bridge Replacement) or would occur after completion of the Graham Hill Road pipe sections (intertie pipeline with Scotts Valley, for which no project timeline has been established). Upon completion of the Proposed Project, the new underground NCP would not result in operational hazards or expose people or structures to significant cumulative wildfire risks.

As described in Impact WIL-1, construction for the Proposed Project could include the use of welding equipment, torching, generators, chainsaws, and chippers, all of which could produce sparks. Similar construction techniques would be used during cumulative project construction at the GHWTP because these projects are under City jurisdiction and would be expected to implement similar Standard Construction Practices. The City's Standard Construction Practices, as described in Section 3.6.6, Standard Construction Practices, include fire safety measures that would be implemented during construction at each of the cumulative project sites, specifically during use of such equipment (Standard Construction Practice #16) as is included in the Proposed Project. Fire suppression equipment would include items such as fire extinguishers and shovels. Therefore, the Proposed Project, in combination with past, present, and reasonably foreseeable future development, would not result in a significant cumulative impact related to significant risk of loss, injury, or death involving wildland fires or indirect exacerbation of wildland fire hazard or post-fire erosion or landslides. As a result, cumulative impacts would be less than significant.

4.12.4 References

- California Department of Forestry and Fire Protection (CAL FIRE). 2007. *Santa Cruz County Fire Hazard Severity Zones in SRA*. November 7, 2007. Accessed June 9, 2021 at https://osfm.fire.ca.gov/media/6768/fhszs_map44.pdf.
- CAL FIRE. 2018. *2018 Strategic Fire Plan for California*. August 22, 2018. Accessed October 21, 2020 at https://osfm.fire.ca.gov/media/5590/2018-strategic-fire-plan-approved-08_22_18.pdf.
- CAL FIRE. 2019. *Strategic Plan*. January 22, 2019. Accessed September 27, 2021 at <https://www.fire.ca.gov/media/5504/strategicplan2019-final.pdf>.
- CAL FIRE 2020. *2020 Fire Siege*. Accessed June 11, 2021 at <https://www.fire.ca.gov/media/hsviuuv3/cal-fire-2020-fire-siege.pdf>.
- CAL FIRE CZU (San Mateo – Santa Cruz Unit). 2018. *Santa Cruz County San Mateo County Community Wildfire Protection Plan*. April 2018. Accessed June 11, 2021 at http://www.sanmateorcd.org/wp-content/uploads/2018/11/2018_CWPP_update_final-Opt.pdf.
- CAL FIRE CZU. 2019. *San Mateo- Santa Cruz Unit 2019 Strategic Fire Plan*. May 2019. Accessed September 27, 2021 at <https://www.arcgis.com/home/item.html?id=9edc979e87b0428fb65a527b51210f06>.
- County of Santa Cruz. 2015. *Local Hazard Mitigation Plan: 2015-2020*. September 2015. Accessed September 27, 2021 at <http://www.co.santa-cruz.ca.us/Portals/0/Local%20Hazard%20Mitigation%20Plan%202015-2020.pdf>.
- County of Santa Cruz. 2021. GIS Data provided by the County.
- Santa Cruz County Civil Grand Jury. 2020. *Ready? Aim? Fire! Santa Cruz County on the Hot Seat*. July 3, 2020. Accessed September 24, 2021 at https://www.co.santa-cruz.ca.us/Portals/0/County/GrandJury/GJ2020_final/FireRisks_Report.pdf.

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