

Morris, Erin

From: Hunt, Colleen@Waterboards <Colleen.Hunt@waterboards.ca.gov>
Sent: Friday, May 30, 2014 10:46 AM
To: Morris, Erin
Subject: RE: NPDES Permit General Plan Update Requirement

No, after some thought, no I don't need to see the housing element. For the other two elements, I have reviewed them both and have no comments. The changes seem to be consistent with the permit. Thank you for the opportunity to comment.

Colleen H. Hunt
Environmental Scientist
State of California
Regional Water Quality Control Board
North Coast Region
707-576-2831
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95401
colleen.hunt@waterboards.ca.gov

-----Original Message-----

From: Morris, Erin [mailto:EMorris@srcity.org]
Sent: Thursday, May 29, 2014 4:28 PM
To: Hunt, Colleen@Waterboards
Subject: RE: NPDES Permit General Plan Update Requirement

Colleen,

Would you like to review the Housing Element? You are certainly welcome to, but as far as I can tell it is not required. Please let me know what you prefer. Thanks a lot for getting involved in the review-- I appreciate it!

Erin Morris | Senior Planner
Community Development | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404 Tel. (707) 543-3273 | Fax (707) 543-3218 | emorris@srcity.org

-----Original Message-----

From: Hunt, Colleen@Waterboards [mailto:Colleen.Hunt@waterboards.ca.gov]
Sent: Thursday, May 29, 2014 10:52 AM
To: Morris, Erin
Subject: RE: NPDES Permit General Plan Update Requirement

I received the open space and noise documents. Is there a separate housing document you would like me to review also?

From: Morris, Erin [EMorris@srcity.org]
Sent: Tuesday, May 27, 2014 10:41 AM

BOARD OF FORESTRY AND FIRE PROTECTION

P.O. Box 944246
SACRAMENTO, CA 94244-2460
Website: www.bof.fire.ca.gov
(916) 653-8007



Erin Morris, Senior Planner
City of Santa Rosa Community Development
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

June 19, 2014

Dear Ms. Morris:

The State Board of Forestry and Fire Protection (Board) is required to review and provide recommendations to the safety element of county and local government general plans when such plans are being amended. This review is in accordance with Government Code (GC) §65302.5 which requires the Board to review the fire safety elements when the general plans contains State Responsibility Areas or Very High Fire Hazard Severity Zones.

Enclosed is the final review and recommendations titled "*City of Santa Rosa Review of the Fire Safety Element.*" The Board has prepared this document in cooperation with members of the Sonoma-Lake-Napa Unit.

Government Code §65302.5 also requires the City of Santa Rosa to consider and accept the recommendations made by the Board and communicate in writing to the Board its reasons for not accepting any recommendations.

Thank you for the opportunity to participate in your planning process and we look forward to working with you on these recommendations. We hope this input leads to greater protection and reduced cost and losses from wildfires to the city and adjacent wildlands.

Sincerely,

Keith Gillless
Chair, Board of Forestry and Fire Protection

CC: George Gentry
Todd Derum
Marshall Turbeville
Kirk Van Wormer

City of Santa Rosa

General Plan Safety Element Assessment Version 3

June 12, 2014

Board of Forestry and Fire
Protection



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Purpose and Background: The State Board of Forestry and Fire Protection (BOF/Board) is required to review and make recommendations for the fire safety element of general plan updates in accordance with Government Code (GC) §65302.5. The review and recommendations apply to those general plans with State Responsibility Area (SRA) (Public Resources Code 4125) or Very High Fire Hazard Severity Zones (VHFHSZ) (GC 51175).

The statutory requirements for the Board review and recommendations pursuant to GC 65302.5 (a)(1) and (2), and (b) are as follows:

- *“The draft elements...to the fire safety element of a county’s or a city’s general plan...shall be submitted to the Board at least 90 days prior to... the adoption or amendment to the safety element of its general plan [for each county or city with SRA or VHFHSZ].”*
- *“The Board shall... review the draft or an existing safety element and report its written recommendations to the planning agency within 60 days of its receipt of the draft or existing safety element....”*
- *“Prior to adoption of the draft element..., the Board of Supervisors... shall consider the recommendations made by the Board... If the Board of Supervisors...determines not to accept all or some of the recommendations..., the Board of Supervisors... shall communicate in writing to the Board its reasons for not accepting the recommendations.”*

Methodology for Review and Recommendations: The Board established a standardized method to review the safety element of general plans. The methodology includes 1) examining the general plan for inclusion of factors that are important for mitigation of fire hazard and risks, and 2) making recommendations related to these factors. The evaluation factors and recommendations were developed using CAL FIRE technical documents and input from local fire departments.

Enclosed is a series of recommendations directed at communities that include:

- Some Very High Fire Hazard Severity Zone acreage and/or State Responsibility Area acreage or abut VHFHSZ/SRA
- Limited financial or physical resources
- Low community support
- Little to no previous wildfire protection planning efforts

The General Plan Safety Element of each jurisdiction that fits those criteria will be assessed based on the recommendations below.

Review Process and Timeline

The county, local jurisdiction, and local fire unit will receive and review technical guidance documents, the BOF checklist, and other relevant information from the Governor's Office of Planning and Research and CAL FIRE.



The county or local jurisdiction will work closely with the local fire unit during the development of the general plan and the safety element in particular.



90 days prior to the adoption or amendment of the General Plan: The county or local jurisdiction will submit the safety element to the local fire unit for review.



No more than 30 days later: The unit will submit to the BOF their findings and recommendations.



No more than 60 days later: The Board will consider the fire unit's recommendations and will approve or approve with amendments the recommendations at the next Board meeting.

Standard List of General Plan Safety Element Recommendations

Please click on the appropriate box to “check” whether the plan satisfies each point. Standard recommendations are included in the checklist but please highlight or add additional comments as necessary.

1.0 General Wildfire Protection Planning

- 1.1 General Plan references and incorporates County or Unit Fire Plan: Yes Partial No

Recommendation: Identify, reference or create (if necessary) a fire plan for the geographic scope of the General Plan. General Plan should incorporate the general concepts and standards from any county fire plan, fire protection agency (federal or state) fire plan, and local hazard mitigation plan. Identify or reference the local Unit Fire Plan and, if applicable, the Community Wildfire Prevention Plan.

Priority: High Medium Low N/A

Recommendation: Ensure fire plans incorporated by reference into the General Plan contain evaluations of fire hazards, assessment of assets at risk, prioritization of hazard mitigation actions, and implementation and monitoring components.

Priority: High Medium Low N/A

- 1.2 Map or describe existing emergency service facilities and areas lacking services, specifically noting any areas in SRA or VHFHSZs. Yes Partial No

Recommendation: Include descriptions of emergency services including available equipment, personnel, and maps of facilities.

Priority: High Medium Low N/A

Recommendation: Initiate studies and analyses to identify appropriate staffing levels and equipment needs commensurate with the current and projected emergency response environment.

Priority: High Medium Low N/A

Recommendation: Establish goals and policies for emergency service training that meets or exceeds state or national standards.

Priority: High Medium Low N/A

- 1.3 Inter-fire service coordination preparedness/mutual aid and multi-jurisdictional fire service agreements. Yes Partial No

Recommendation: Adopt the Standardized Emergency Management Systems for responding to large scale disasters requiring a multi-agency response. Ensure and review mutual aid/automatic aid and other cooperative agreements with adjoining emergency service providers.

Priority: High Medium Low N/A

Additional Wildfire Protection Planning Recommendations:

Back in 2007, I think Santa Rosa adopted their own Very High Zone using CAL FIRE's recommendation (http://www.fire.ca.gov/fire_prevention/fhsz_maps_sonoma.php). Charles Hanley was the lead on this project for the City and I think they wanted more "Very High" than what was shown by CAL FIRE's model/recommendation. Prior to 2007, I think they had an "original" 1985 Bates Bill Very High zone based upon an opinion rather than a GIS based model. The map shown as Figure 12-5 is, I think, from 2007 and they place more emphasis on their Wildland-Urban Interface (WUI) Zone than the recommended LRA Very High area. I/we have no issues with the WUI designated and most of this area is then part of the Mutual Threat Zone where they get a CAL FIRE response. Interesting to note is that they do not show the adjacent SRA FHSZ ranking to the City Limits (in the planning area boundary) which would show SRA Very High as the "real threat" to the City east of Oakmont and in the planning area boundary.

They mention "four types of fire hazard zones..." on the top of page 12-13. CAL FIRE did not provide four types of fire hazard severity zones for the LRA. We did model three zones for the SRA. Their map does not show four types, just very high and their WUI designated area. Where are their other two zones/types?

NS-G-5 references "high" fire hazard zones. Should this be "Very High" or "WUI" Zones. Where is high?

2.0 Land Use Planning:

2.1 Disclosure wildland urban interface hazards including Fire Hazard Severity Zones designations and other vulnerable areas as determined by CAL FIRE or fire prevention organizations. Describe or map any Firewise Communities or other firesafe communities as determined by the National Fire Protection Association, Fire Safe Council, or other organizations. Yes Partial No

Recommendation: Discuss and/or include local fire hazard maps.

Priority: High Medium Low N/A

Recommendation: Adopt CAL FIRE recommended Fire Hazard Severity Zones including model ordinances developed by the Office of the State Fire Marshal for establishing VHFHSZ areas. Include a map of the zones that clearly indicates any area designated VHFHSZ.

Priority: High Medium Low N/A

2.2 Goals and policies include mitigation of fire hazard for future development. Yes Partial No

Recommendation: Create fire safe development codes used as standards for fire protection for new development in State Responsibility Area (SRA) within the entity's jurisdiction that meets or exceed statewide standards in 14 California Code of Regulations Section 1270 et seq. Have the codes certified by the Board of Forestry.

Priority: High Medium Low N/A

Recommendation: Establish goals and policies for specific ordinances addressing evacuation and emergency vehicle access; water supplies and fire flow; fuel modification for defensible space; and home addressing and signing.

Priority: High Medium Low N/A

Recommendation: Consider mitigation of previously developed areas that do not meet Title 14 California Code of Regulations Section 1270 et seq. or equivalent local ordinance.

Priority: High Medium Low N/A

- 2.3 The design and location of new development provides for adequate infrastructure for the safe ingress of emergency response vehicles and simultaneously allows civilian egress during an emergency: Yes Partial No

Recommendation: Specify the local ordinances, code sections, or regulations addressing the above standards, particularly any ordinances that address right-of-way, easement, and other reasonable offsite and onsite improvements for a division of land which qualifies for a Parcel Map rather than a Tentative/Final Map under the Subdivision Map Act.

Priority: High Medium Low N/A

Recommendation: Develop pre-plans for fire prone areas that address civilian evacuations to temporary safety locations.

Priority: High Medium Low N/A

- 2.4 Geographic specific fire risk reduction mitigation measures. Yes Partial No

Recommendation: Include policies and recommendations that incorporate fire safe buffers and greenbelts as part of the development planning. Ensure that land uses designated near high or very fire hazard severity zones are compatible with wildland fire protection strategies/capabilities.

Priority: High Medium Low N/A

3.0 **Housing:**

- 3.1 Incorporation of current fire safe building codes and fire engineering features for structures in VHFHSZ. Yes Partial No

Recommendation: Adopt building codes for new development in State Responsibility Areas or incorporated areas with VHFHSZ that are based on those established by the Office of the State Fire Marshal in Title 19 and Title 24 CCR, referred to as the "Wildland Urban Interface Building Codes."

Priority: High Medium Low N/A

Recommendation: Ensure new development proposals contain specific fire protection plans, actions, and codes for fire engineering features for structures in VHFHSZ. Examples include codes requiring automatic sprinklers in VHFHSZ.

Priority: High Medium Low N/A

Recommendation: Ensure residential areas have appropriate fire resistant landscapes and discontinuous vegetation adjacent to open space or wildland areas.

Priority: High Medium Low N/A

3.2 Consideration of diverse occupancies and their effects on wildfire protection.

Yes Partial No

Recommendation: Ensure risks to uniquely occupied structures, such as seasonally occupied homes, multiple dwelling structures, or other structures with unique occupancy characteristics, are considered for appropriate and unique wildfire protection needs.

Priority: High Medium Low N/A

3.3 Fuel modification around homes. Yes Partial No

Recommendation: Establish ordinances in SRA or VHFHSZ for vegetation fire hazard reduction around structures that meet or exceed the Board of Forestry and Fire Protection's Defensible Space Guidelines for SRA and the Very High Fire Hazard severity zones, including vacant lots.

See http://www.bof.fire.ca.gov/pdfs/Copyof4291finalguidelines9_29_06.pdf

Priority: High Medium Low N/A

Recommendation: Reduce fuel around communities and subdivisions, considering fuels, topography, weather (prevailing winds and wind event specific to the area), fire ignitions and fire history.

Priority: High Medium Low N/A

3.4 Identification and actions for substandard fire safe housing and neighborhoods relative to fire hazard area. Yes Partial No

Recommendation: Identify plans and actions to improve substandard housing structures and neighborhoods. Plans and actions should include structural rehabilitation, occupancy reduction, demolition, reconstruction, neighborhood –wide fuels hazard reduction projects, community education, and other community based solutions.

Priority: High Medium Low N/A

Recommendation: Identify plans and actions for existing residential structures and neighborhoods, and particularly substandard residential structures and neighborhoods, to be improved to meet current fire safe ordinances pertaining to access, water flow, signing, and vegetation clearing.

Priority: High Medium Low N/A

3.5 Assessment and projection of future emergency service needs. Yes Partial No

Recommendation: Ensure new development includes appropriate facilities, equipment,

personnel and capacity to assist and support wildfire suppression emergency service needs. Future emergency service needs should be:

- Established consistent with state or national standards.
- Developed based on criteria for determining suppression resource allocation that includes elements such as identified values and assets at risk, ignition density, vegetation type and condition, as well as local weather and topography.
- Local Agency Formation municipal services reviews for evaluating level of service, response times, equipment condition levels and other relevant emergency service information.

Priority: High Medium Low N/A

4.0 Conservation and Open Space:

4.1 Integration of open space into fire safety effectiveness. Yes Partial No

Recommendation: Establish goals and policies for incorporating systematic fire protection improvements for open space. Specifics policies should address facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with agencies/private landowners managing open space adjacent to the General Plan area, water sources for fire suppression, and other fire prevention and suppression needs.

Priority: High Medium Low N/A

4.2 Identification of critical natural resource values relative to fire hazard areas. Yes Partial No

Recommendation: Identify critical natural resources and other “open space” values within the geographic scope of the General Plan.

Priority: High Medium Low N/A

Recommendation: Evaluate and resolve existing laws and local ordinances which conflict with fire protection requirements. Examples include conflicts with vegetation hazard reduction ordinances and listed species habitat protection requirements.

Priority: High Medium Low N/A

4.3 Inclusion of resource management activities to enhance protection of open space and natural resource values. Yes Partial No

Recommendation: Develop plans and action items for vegetation management that provides fire damage mitigation and protection of open space values. Plans should address protection of natural resource financial values, establishment of fire resilient natural resources, protection of watershed qualities, and protection of endangered species habitats. Actions should consider prescribed burning, fuel breaks, and vegetation thinning and removal

Priority: High Medium Low N/A

Recommendation: Establish goals and policies for reducing the wildland fire hazards within the entity’s boundaries and, with the appropriate partners, on adjacent private wildlands, federal lands, vacant residential lots, and greenbelts with fire hazards that threaten the entity’s

jurisdiction.

Priority: High Medium Low N/A

5.0 **Circulation:**

- 5.1 Adequate access to high hazard wildland/open space areas. Yes Partial No

Recommendation: Establish goals and policies for adequate access in Very High Fire Hazard Severity Zones that meet or exceed standards in Title 14 CCR 1270 for lands with no structures, and maintain conditions of access in a suitable fashion for suppression access or public evacuation.

Priority: High Medium Low N/A

- 5.3 Incorporate a policy that provides for a fuel maintenance program along roadways in the agency having jurisdiction. Yes Partial No

Recommendation: Develop an adaptive vegetation management plan that considers fuels, topography, weather (prevailing winds and wind event specific to the area), fire ignitions and fire history.

Priority: High Medium Low N/A

6.0 **Post Fire Recovery and Maintenance:**

The post fire recommendations address an opportunity for the community and landowners to re-evaluate land uses and practices that affect future wildfire hazards and risk.

- 6.1 Reevaluate hazard conditions and provide for future fire safe conditions. Yes Partial No

Recommendation: Incorporate goals and policies that provide for reassessment of fire hazards following wildfire events. Adjust fire prevention and suppression needs commensurate for both short and long term fire protection needs.

Priority: High Medium Low N/A

Recommendation: Develop burn area recovery plans that incorporate strategic fire safe measures developed during the fire suppression, such as access roads, fire lines, safety zones, and fuelbreaks, and helispots.

Priority: High Medium Low N/A

- 6.2 Evaluation of redevelopment. Yes Partial No

Recommendation: In High and Very High Hazard areas, ensure redevelopment utilizes state of the art fire resistant building and development standards to improve past 'substandard' fire safe conditions.

Priority: High Medium Low N/A

- 8.6 Long term maintenance of fire hazard reduction mitigation projects. Yes Partial No

Recommendation: Provide polices and goals for maintenance of the post-fire-recovery projects, activities, or infrastructure.

Priority: High Medium Low N/A

8.7 Post fire life and safety assessments. Yes Partial No

Recommendation: Identity flood and landslide vulnerability areas related to post wildfire conditions.

Priority: High Medium Low N/A

Recommendation: Establish goals and policies that address the intersection of flood /landslide/post fire burn areas into long term public safety protection plans. These should include treatment assessment of fire related flood risk to life, methods to control storm runoff in burn areas, revegetation of burn areas, and drainage crossing maintenance.

Priority: High Medium Low N/A

Additional Recommendations:

Firebreaks is used both as one word and two words. Is it better to use "fuel breaks?" Also, "hazard" is missing from "fire hazard zone" language.

- Reference CAL FIRE for the modeling that is the basis for their maps
- Mention evacuation routes, centers, procedures as a goal and policy.
- Include a reference to Chapter 7A in NS-G-2 on page 12-19. Suggested wording: "...utilize fire-resistant building materials pursuant to Chapter 7A."
- More emphasis on defensible space than fire breaks. It is mentioned in NS-G-2 as vegetation management plans which is what I think the City enforces for new development.
- NS-G-2 has "fire retardant landscaping." Should it be "fire resistant," and maybe include mention of a second goal to be drought resistant?
- Mention their City weed abatement ordinance and code enforcement more



July 7, 2014

Mr. Keith Gilles, Chair
State Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Mr. Gilles:

RE: City of Santa Rosa General Plan Update: Noise and Safety Element

Thank you for reviewing the City of Santa Rosa's draft update to the Noise and Safety Element of the City's General Plan and providing comments on June 19, 2014. State law requires that the City update the Safety Element when revising the Housing Element.

The purpose of this letter is to explain the methodology the City used to develop the amendment to the Safety Element, and to provide a response to the recommendations from the Board. The proposed amendment was prepared in response to Government Code Section 65302(g)(3), which specifies that the Safety Element be reviewed and updated as necessary to address the risk of fire for land classified as state responsibility areas, as defined in Section 4102 of the Public Resources Code, and land classified as very high fire hazard severity zones, as defined in Section 51177.

The Safety Element review must also consider the advice included in the Office of Planning and Research's most recent publication of "Fire Hazard Planning, General Technical Advice Series," prepared by the Governor's Office of Planning Research and last updated in 2003. Section 65302(3) lists a series of requirements that the update must address. City staff consulted the Technical Advice series and went through each item on the list to develop the proposed amendment and used Section 65302(g)(3) as a checklist to ensure the Safety Element addresses State law requirements.

The letter received from the State Board of Forestry and Fire Protection is broad in scope and addresses topics that were not included in the City's proposed amendment, which focuses on the requirements of Section 65302(g)(3). Many of the topics identified in this letter are addressed in other documents or other locations in the Santa Rosa General Plan, as described below.

The Local Hazard Mitigation Plan (LHMP), which the City of Santa Rosa adopted in 2012, acknowledges that wildfire poses significant risk in Santa Rosa. It assesses exposure to hazards, including wildfire and provides programs to create a more disaster-resistant region. The LHMP is referenced in Policy NS-A-4 of the Noise and Safety Element which states, "Implement the Local Hazard Mitigation Plan to better prepare Santa Rosa for disaster." The LHMP is adopted as an implementation appendix to the General Plan.

The Santa Rosa Emergency Operations Plan (EOP), referenced on Page 12-1 of the Safety Element, provides additional details about how the City will respond to disasters, and is consistent with the LHMP.

General Wildfire Protection Planning

Regarding wildfire protection planning, the Board letter recommends reference of fire plans, description of staffing levels, equipment needs, and training. The LHMP, combined with the EOP, constitute the City's fire plan and provide evaluations of fire hazards, risk assessments, and implementation plans. Training and equipment are addressed in both plans. In response to the comment about depicting emergency service facilities relative to fire hazard severity zones, Figure 12-5 will be updated to depict the locations of fire stations, the City's emergency operations center, and the main hospitals that serve Santa Rosa.

In the draft Safety Element, the Wildland Urban Interface zone, and the Very High Fire Severity Zone (which is part of the WUI) are depicted. The City of Santa Rosa adopted the WUI in 2009 to allow implementation of building code regulations related to fire safety. The Very High Fire Severity Zone boundary, as defined by the State, is also illustrated as identified by Section 65302(g)(3). Figure 12-5 will be updated to note that the WUI is based on City of Santa Rosa designation and the Very High Fire Severity Zone is based on Cal Fire information. Correspondingly, Policy NS-G-5 will be amended to reference the WUI and the Very High Fire Severity Zone.

Housing

The goals and policies of the General Plan are intended to be broad and to reference plans with more specific details, such as the LHMP and EOP. The General Plan acknowledges that there are residential (and non-residential) uses located within fire hazard zones. The requested additions to the General Plan to address vacation homes and other unique occupancies are very specific, occur rarely in Santa Rosa, and do not fit well with the level of detail contained in the General Plan.

Future emergency service needs are addressed in the Public Services and Facilities Element of the General Plan. Policy PSF-E states, "Provide fire and police services that ensure the safety of the community."

Conservation and Open Space

The State letter recommends inclusion of natural resource and open space values and incorporation of fire protection improvements for open space. Revised Policy NS-G-2 is intended to address the importance of the development and ongoing implementation of vegetation management plans in Wildland Urban Interface areas including very high fire severity zones and others. The City will look further into the State recommendations during a future comprehensive update of the Safety Element.

Circulation

The State letter recommends development of a policy for an adaptive vegetation management plan along roadways. Revised Policy NS-G-2 addresses vegetation management plans with new

development in the WUI, which will address this issue insomuch as new development is proposed in the WUI.

Post Fire Recovery and Maintenance

The State letter recommends assessment of hazards after fire events, such as fire prevention and erosion control, along with goals for post fire recovery projects and infrastructure. The City's Emergency Operations Plan addresses post-incident recovery, including mitigation measures to prevent future occurrences of a given threat facing the City. Recommended minor wording changes such as from "fire retardant" to "fire resistant" will be made.

Conclusion

The City of Santa Rosa strives to comply with State law with this Safety Element update. Many of the recommendations received are addressed both in the General Plan and associated documents, and some of the recommendations will be considered and addressed in a future comprehensive update of the element. If it would be helpful to the Board, Fire Department staff are available to meet and discuss the above topics, particularly Santa Rosa's existing plans and practices regarding fire safety and prevention.

If you have any questions about this letter, I can be reached by phone at 707/543-3273 or by email at emorris@srcity.org.

Sincerely,



ERIN MORRIS
Senior Planner

CC: Anthony Gossner, Fire Department
Chuck Regalia, Community Development Department

