

General Plan Safety Element Assessment

Board of Forestry and Fire Protection



June 2020

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Purpose and Background

Upon the next revision of the housing element on or after January 1, 2014, the safety element is required to be reviewed and updated as necessary to address the risk of fire for land classified as state responsibility areas and land classified as very high fire hazard severity zones. (Gov. Code, § 65302, subd. (g)(3).)

The safety element is required to include:

- Fire hazard severity zone maps available from the Department of Forestry and Fire Protection.
- Any historical data on wildfires available from local agencies or a reference to where the data can be found.
- Information about wildfire hazard areas that may be available from the United States Geological Survey.
- The general location and distribution of existing and planned uses of land in very high fire hazard severity zones (VHFHSZs) and in state responsibility areas (SRAs), including structures, roads, utilities, and essential public facilities. The location and distribution of planned uses of land shall not require defensible space compliance measures required by state law or local ordinance to occur on publicly owned lands or open space designations of homeowner associations.
- The local, state, and federal agencies with responsibility for fire protection, including special districts and local offices of emergency services. (Gov. Code, § 65302, subd. (g)(3)(A).)

Based on that information, the safety element shall include goals, policies, and objectives that protect the community from the unreasonable risk of wildfire. (Gov. Code, § 65302, subd. (g)(3)(B).) To carry out those goals, policies, and objectives, feasible implementation measures shall be included in the safety element, which include but are not limited to:

- Avoiding or minimizing the wildfire hazards associated with new uses of land.
- Locating, when feasible, new essential public facilities outside of high fire risk areas, including, but not limited to, hospitals and health care facilities, emergency shelters, emergency command centers, and emergency communications facilities, or identifying construction methods or other methods to minimize damage if these facilities are located in the SRA or VHFHSZ.
- Designing adequate infrastructure if a new development is located in the SRA or VHFHSZ, including safe access for emergency response vehicles, visible street signs, and water supplies for structural fire suppression.
- Working cooperatively with public agencies with responsibility for fire protection. (Gov. Code, § 65302, subd. (g)(3)(C).)

The safety element shall also attach or reference any fire safety plans or other documents adopted by the city or county that fulfill the goals and objectives or contains the information required above. (Gov. Code, § 65302, subd. (g)(3)(D).) This might include Local Hazard Mitigation Plans, Unit Fire Plans, Community Wildfire Protection Plans, or other plans.

There are several reference documents developed by state agencies to assist local jurisdictions in updating their safety elements to include wildfire safety. The Fire Hazard Planning, General Plan Technical Advice Series from the Governor's Office of Planning and Research (OPR), referenced in Government Code section 65302, subdivision (g)(3) and available at

1400 Tenth Street
Sacramento, CA 95814
Phone: (916) 322-2318

The Technical Advice Series is also available from the OPR website ([Technical Advice Series link](#)).^{*} The Technical Advice Series provides policy guidance, information resources, and fire hazard planning examples from around California that shall be considered by local jurisdictions when reviewing the safety element of its general plan.

The Board of Forestry and Fire Protection (Board) utilizes this Safety Element Assessment in the Board's review of safety elements under Government Code section 65302.5. At least 90 days prior to the adoption or amendment of their safety element, counties that contain SRAs and cities or counties that contain VHFHSZs shall submit their safety element to the Board. (Gov. Code, § 65302.5, subd. (b).) The Board shall review the safety element and respond to the city or county with its findings regarding the uses of land and policies in SRAs or VHFHSZs that will protect life, property, and natural resources from

unreasonable risks associated with wildfires, and the methods and strategies for wildfire risk reduction and prevention within SRAs or VHFHSZs. (Gov. Code, § 65302.5, subd. (b)(3).)

The CAL FIRE Land Use Planning team provides expert fire protection assistance to local jurisdictions statewide. Fire captains are available to work with cities and counties to revise their safety elements and enhance their strategic fire protection planning.

Methodology for Review and Recommendations

Utilizing staff from the CAL FIRE Land Use Planning team, the Board has established a standardized method to review the safety element of general plans. The methodology includes

- 1) reviewing the safety element for the requirements in Government Code section 65302, subdivision (g)(3)(A),
- 2) examining the safety element for goals, policies, objectives, and implementation measures that mitigate the wildfire risk in the planning area (Gov. Code, § 65302, subd. (g)(3)(B) & (C)), and
- 3) making recommendations for methods and strategies that would reduce the risk of wildfires (Gov. Code, § 65302.5, subd. (b)(3)(B)).

The safety element will be evaluated against the attached Assessment, which contains questions to determine if a safety element meets the fire safety planning requirements outlined in Government Code, section 65302. The reviewer will answer whether or not a submitted safety element addresses the required information, and will recommend changes to the safety element that will reduce the wildfire risk in the planning area. These recommended changes may come from the list of sample goals, policies, objectives, and implementation measures that is included in this document after the Assessment, or may be based on the reviewer's knowledge of the jurisdiction in question and their specific wildfire risk. By answering the questions in the Assessment, the reviewer will determine if the jurisdiction's safety element has adequately addressed and mitigated their wildfire risk. If it hasn't, any specific recommendations from the reviewer will assist the jurisdiction in revising the safety element so that it does.

Once completed, the Assessment should provide clear guidance to a city or county regarding any areas of deficiency in the safety element as well as specific goals, policies, objectives, and implementation measures the Board recommends adopting in order to mitigate or reduce the wildfire threat in the planning area.

General Plan Safety Element Assessment

Jurisdiction: City of San Marcos	Notes:	CAL FIRE Unit: MVU	Date Received: 6/03/2021
County: Sand Diego County	LUPP Reviewer: Barkley Brian	UNIT CONTACT: Chief Nissen	Date Reviewed: 06/03/2021

BACKGROUND INFORMATION SUMMARY

The safety element must contain specific background information about fire hazards in each jurisdiction.

Instructions for this table: Indicate whether the safety element includes the specified information. If YES, indicate in the comments where that information can be found; if NO, provide recommendations to the jurisdiction regarding how best to include that information in their revised safety element.

Required Information	Yes or No	Comments and Recommendations
Are Fire Hazard Severity Zones Identified? <i>CAL FIRE or Locally Adopted Maps</i>	YES	Page 12, Fire
Is historical data on wildfires or a reference to where the data can be found, and information about wildfire hazard areas that may be available from the United States Geological Survey, included?	YES	Page 15-19 Wildland Urban Interface Community Wildfire Protection Plan
Has the general location and distribution of existing and planned uses of land in very high fire hazard severity zones (VHFHSZs) and in state responsibility areas (SRAs), including structures, roads, utilities, and essential public facilities, been identified?	YES	Page 13, Fire Hazard Severity Zones
Have local, state, and federal agencies with responsibility for fire protection, including special districts and local offices of emergency services, been identified?	YES	Page 6, Under Fires
Are other fire protection plans, such as Community Wildfire Protection Plans, Local Hazard Mitigation Plans, CAL FIRE Unit or Contract County Fire Plans, referenced or incorporated into the Safety Element?	YES	Page 14, Under Wildland Fire
Are residential developments in hazard areas that do not have at least two emergency evacuation routes identified?	YES	Page 32, Existing Evacuation Routes
Have evacuation routes and their capacity, safety, and viability under a range of emergency scenarios been identified?	YES	Page 32, Existing Evacuation Routes

Is there any other information in the Safety Element regarding fire hazards in SRAs or VHFHSZs?

GOALS, POLICIES, OBJECTIVES, AND FEASIBLE IMPLEMENTATION MEASURES

The safety element must contain a set of goals, policies, and objectives based on the above information to protect the community from unreasonable risk of wildfire and implementation measures to accomplish those stated goals, policies, and objectives.

Instructions for this table: Critically examine the submitted safety element and determine if it is adequate to address the jurisdiction's unique fire hazard. Answer YES or NO appropriately for each question below. If the recommendation is irrelevant or unrelated to the jurisdiction's fire hazard, answer N/A. For NO, provide information in the Comments/Recommendations section to help the jurisdiction incorporate that change into their safety element revision. This information may utilize example recommendations from Sample Safety Element Recommendations and Fire Hazard Planning in Other Elements of the General Plan below, may indicate how high of a priority this recommendation is for a jurisdiction, or may include other jurisdiction-specific information or recommendations.

Section 1 Avoiding or minimizing the wildfire hazards associated with new uses of land		
Questions	Yes or No	Comments and Recommendations
Does local ordinance require development standards that meet or exceed title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 (commencing with section 1270) (SRA Fire Safe Regulations) and title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with section 1299.01) (Fire Hazard Reduction Around Buildings and Structures Regulations) for SRAs and/or VHFHSZs?	YES	The City adopts the San Diego County Consolidated Fire Code which is certified by the State Board of Forestry and Fire protection. The City of San Marcos's municipal code is more restrictive.
Are there goals and policies to avoid or minimize new residential development in VHFHSZs?	YES	Policy S-3.7: a. Minimize new residential development in VHFHSZs, and locate future public facilities, including new essential and sensitive facilities, outside of VHFHSZs when possible.
Has fire safe design been incorporated into future development requirements?	YES	Policy S-3.7: Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.
Are new essential public facilities located outside high fire risk areas, such as VHFHSZs, when feasible?	YES	Page 39, Policy S-3.14: Locate, when feasible, new essential public facilities and utilities outside of very high fire hazard severity zones, including but not limited to, hospitals and health care facilities, emergency shelters, emergency command centers, and emergency communication facilities, or identify construction methods or other methods to minimize damage if these facilities are located in very high fire hazard severity zones.

Questions	Yes or No	Comments and Recommendations
<p>Are there plans or actions identified to mitigate existing non-conforming development to contemporary fire safe standards, in terms of road standards and vegetative hazard?</p>	<p>YES</p>	<p>Policy S-3.6: Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones.</p> <p>a. Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a community plan update or amendment.</p> <p>b. Identify building and site design methods or other methods to minimize damage if new structures are located in very high fire hazard severity zones on undeveloped land and when rebuilding after a fire.</p> <p>c. Require ongoing brush management to minimize the risk of structural damage or loss due to wildfires.</p> <p>d. Provide and maintain water supply systems to supplies for structural fire suppression.</p> <p>e. Provide adequate fire protection.</p>
<p>Does the plan include policies to evaluate re-development after a large fire?</p>	<p>YES</p>	<p>Policy S-3.6b</p>
<p>Is fuel modification around homes and subdivisions required for new development in SRAs or VHFHSZs?</p>	<p>YES</p>	<p>Policy S-3.5: Support programs and plans, such as Strategic Fire Plans, consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.</p>
<p>Are fire protection plans required for new development in VHFHSZs?</p>	<p>YES</p>	<p>Fire Protection Plans (FPPs). SMFD requires FPPs for all medium and large projects within both the City and SMFD Fire District. The City has adopted Sec. 4903.1 of the County Consolidated Fire Code to regulate FPPs within the SMFD Fire District: "When required. Planning and Development Services or the FAHJ may require an applicant for a parcel map, subdivision map, specific plan or major use permit for any property located in a wildland-urban interface fire area to submit a Fire Protection Plan (FPP) as part of the approval process."</p>

Questions	Yes or No	Comments and Recommendations
Does the plan address long term maintenance of fire hazard reduction projects, including community fire breaks and private road and public road clearance?	YES	Policy S-3.7: Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.
Is there adequate access (ingress, egress) to new development in VHFHSZs?	YES	Policy S-3.7: Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.
Are minimum standards for evacuation of residential areas in VHFHSZs defined?	YES	SE: Pg. 6-27 references the Unified San Diego County EOP; existing evacuation routes discussed on pg. 6-32, also added mention of White Paper with specific SB 99 analysis added as an Appendix. SE: Policies S-3.3, S-3.9, 3.12 "Other major circulation thoroughfares identified in Figure 3-1 of the Mobility Element would also be appropriate for use as evacuation routes, depending on the location of the emergency event."
If areas exist with inadequate access/evacuation routes, are they identified? Are mitigation measures or improvement plans identified?	YES	Policy S-3.3: Require development to provide additional access roads when necessary, to provide for safe access of emergency equipment and civilian evacuation concurrently.
Are there policies or programs promoting public outreach about defensible space or evacuation routes? Are there specific plans to reach at-risk populations?	YES	Policy S-3.10: Provide wildland fire preparedness education for fire safety advance planning.
Does the plan identify future water supply for fire suppression needs?	YES	Policy S-3.6: Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones.
Does new development have adequate fire protection?	YES	Policy S-3.4: Coordinate with fire protection and emergency service providers to assess fire hazards before and after wild- fire events to adjust fire prevention and suppression needs, as necessary, commensurate with both short and long term fire prevention needs.

Section 2 Develop adequate infrastructure if a new development is located in SRAs or VHFHSZs.

Does the plan identify adequate infrastructure for new development related to:	Yes or No	Comments and Recommendations
Water supply and fire flow?	YES	Water supply is discussed on pgs. 2-49 and 2-50 of the LU&CD Element, and within each water district's Urban Water Management Plan (UWMP). LU&CD Element: Goal LU-13
Location of anticipated water supply?	YES	Water supply is discussed on pgs. 2-49 and 2-50 of the LU&CD Element, and within each water district's Urban Water Management Plan (UWMP). LU&CD Element: Goal LU-13
Maintenance and long-term integrity of water supplies?	YES	Water supply is discussed on pgs. 2-49 and 2-50 of the LU&CD Element, and within each water district's Urban Water Management Plan (UWMP). LU&CD Element: Goal LU-13
Evacuation and emergency vehicle access?	YES	Policy S-3.3: Require development to provide additional access roads when necessary, to provide for safe access of emergency equipment and civilian evacuation concur-
Fuel modification and defensible space?	YES	Policy S-3.5: Support programs and plans, such as Strategic Fire Plans, consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.
Vegetation clearance maintenance on public and private roads?	YES	Policy S-3.8: Implement brush management along City maintained roads in very high fire hazard severity zones adjacent to open space and canyon areas.
Visible home and street addressing and signage?	YES	Policy S-3.7: Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.

Does the plan identify adequate infrastructure for new development related to:	Yes or No	Comments and Recommendations
Community fire breaks? Is there a discussion of how those fire breaks will be maintained?	YES	Policy S-3.7: Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.

Section 3 Working cooperatively with public agencies responsible for fire protection.

Question	Yes or No	Comments and Recommendations
Is there a map or description of existing emergency service facilities and areas lacking service, specifically noting any areas in SRAs or VHFHSZs?	YES	SE (pg. 6-1): The City maintains critical facilities for health, safety, and emergency response. These facilities do not occur in hazard areas and are identified in the Public Services, Infrastructure, and Utilities section of Chapter 2, Land Use and Community Design Element. LU&CD Element: Figure 2-11 Goal LU-8, LU-10
Does the plan include an assessment and projection of future emergency service needs?	YES	Land Use and Community Design Element Policy LU-10.1: Provide demand-based firefighting and emergency medical services infrastructure, equipment, and personnel to provide a high level of fire, emergency
Are goals or standards for emergency services training described?	YES	MJHMP: Action 4.A.1: Continue the program of multi-jurisdictional/multi-functional training and exercises to enhance hazard mitigation. Action 4.A.4: Maintain multi-jurisdictional/multi-functional training and exercises to enhance hazard mitigation. SM MJHMP: Action 2.B.1: Coordinate dam failure inundation awareness training/information with Vallecitos Water District and the Sheriff's Department. Action 6.B.4: Conduct annual wildland fire fighting and ICS training to ensure operational readiness.
Does the plan outline inter-agency preparedness coordination and mutual aid multi-agency agreements?	YES	Discussed throughout SE, MJHMP, SMHMP, and CWPP

Sample Safety Element Recommendations

These are examples of specific policies, objectives, or implementation measures that may be used to meet the intent of Government Code sections 65302, subdivision (g)(3) and 65302.5, subdivision (b). Safety element reviewers may make recommendations that are not included here.

A. MAPS, PLANS AND HISTORICAL INFORMATION

1. Include or reference CAL FIRE Fire Hazard Severity Zone maps or locally adopted wildfire hazard zones.
2. Include or reference the location of historical information on wildfires in the planning area.
3. Include a map or description of the location of existing and planned land uses in SRAs and VHFHSZs, particularly habitable structures, roads, utilities, and essential public facilities.
4. Identify or reference a fire plan that is relevant to the geographic scope of the general plan, including the Unit/Contract County Fire Plan, Local Hazard Mitigation Plan, and any applicable Community Wildfire Protection Plans.
5. Align the goals, policies, objectives, and implementation measures for fire hazard mitigation in the safety element with those in existing fire plans, or make plans to update fire plans to match the safety element.
6. Create a fire plan for the planning area.

B. LAND USE

1. Develop fire safe development codes to use as standards for fire protection for new development in SRAs or VHFHSZs that meet or exceed the statewide minimums in the SRA Fire Safe Regulations.
2. Adopt and have certified by the Board of Forestry and Fire Protection local ordinances which meet or exceed the minimum statewide standards in the SRA Fire Safe Regulations.
3. Identify existing development that do not meet or exceed the SRA Fire Safe Regulations or certified local ordinances.
4. Develop mitigation measures for existing development that does not meet or exceed the SRA Fire Safe Regulations or certified local ordinances or identify a policy to do so.

C. FUEL MODIFICATION

1. Develop a policy to communicate vegetation clearance requirements to seasonal, absent, or vacation rental owners.
2. Identify a policy for the ongoing maintenance of vegetation clearance on public and private roads.
3. Include fuel breaks in the layout/siting of subdivisions.
4. Identify a policy for the ongoing maintenance of existing or proposed fuel breaks.
5. Identify and/or map existing development that does not conform to current state and/or locally adopted fire safety standards for access, water supply and fire flow, signing, and vegetation clearance in SRAs or VHFHSZs.
6. Identify plans and actions for existing non-conforming development to be improved or mitigated to meet current state and/or locally adopted fire safety standards for access, water supply and fire flow, signing, and vegetation clearance.

D. ACCESS

1. Develop a policy that approval of parcel maps and tentative maps in SRAs or VHFHSZs is conditional based on meeting the SRA Fire Safe Regulations and the Fire Hazard Reduction Around Buildings and Structures Regulations, particularly those regarding road standards for ingress, egress, and fire equipment access. (See Gov. Code, § 66474.02.)
2. Develop a policy that development will be prioritized in areas with an adequate road network and associated infrastructure.
3. Identify multi-family housing, group homes, or other community housing in SRAs or VHFHSZs and develop a policy to create evacuation or shelter in place plans.
4. Include a policy to develop pre-plans for fire risk areas that address civilian evacuation and to effectively communicate those plans.
5. Identify road networks in SRAs or VHFHSZs that do not meet title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 2 and 3 (commencing with section 1273.00) or certified local ordinance and develop a policy to examine possible mitigations.

E. FIRE PROTECTION

1. Develop a policy that development will be prioritized in areas with adequate water supply infrastructure.
2. Plan for the ongoing maintenance and long-term integrity of planned and existing water supply infrastructure.
3. Map existing emergency service facilities and note any areas lacking service, especially in SRAs or VHFHSZs.
4. Project future emergency service needs for the planned land uses.
5. Include information about emergency service trainings or standards and plans to meet or maintain them.
6. Include information about inter-agency preparedness coordination or mutual aid agreements.

Fire Hazard Planning in Other Elements of the General Plan

When updating the General Plan, here are some ways to incorporate fire hazard planning into other elements. Wildfire safety is best accomplished by holistic, strategic fire planning that takes advantage of opportunities to align priorities and implementation measures within and across plans.

LAND USE ELEMENT

Goals and policies include mitigation of fire hazard for future development or limit development in very high fire hazard severity zones.

Disclose wildland urban-interface hazards, including fire hazard severity zones, and/or other vulnerable areas as determined by CAL FIRE or local fire agency.

Design and locate new development to provide adequate infrastructure for the safe ingress of emergency response vehicles and simultaneously allow citizen egress during emergencies.

Describe or map any Firewise Communities or other fire safe communities as determined by the National Fire Protection Association, Fire Safe Council, or other organization.

HOUSING ELEMENT

Incorporation of current fire safe building codes.

Identify and mitigate substandard fire safe housing and neighborhoods relative to fire hazard severity zones.

Consider diverse occupancies and their effects on wildfire protection (group housing, seasonal populations, transit-dependent, etc).

OPEN SPACE AND CONSERVATION ELEMENTS

Identify critical natural resource values relative to fire hazard severity zones.

Include resource management activities to enhance protection of open space and natural resource values.

Integrate open space into fire safety planning and effectiveness.

Mitigation for unique pest, disease and other forest health issues leading to hazardous situations.

CIRCULATION ELEMENT

Provide adequate access to very high fire hazard severity zones.

Develop standards for evacuation of residential areas in very high fire hazard severity zones.

Incorporate a policy that provides for a fuel reduction maintenance program along roadways.