General Plan Safety Element Assessment

Board of Forestry and Fire Protection

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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](https://www.opr.ca.gov/docs/Final_6.26.15.pdf)).\*

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 stafffrom 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 Moreno Valley | Notes: Final review | CAL FIRE Unit: RRU | Date Received: Work Began Feb 2021 |
| County: Riverside | LUPP Reviewer: Raymond Martinez | UNIT CONTACT: Chief Abdul | Date Reviewed: 4/9/2021 |

## 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?  *CAL FIRE or Locally Adopted Maps* | Yes | Page 6-9 Map S-5 CAL FIRE, Fire Hazard Severity Zones, Wildfire risks first paragraph references the adoption text and figure Map S-5 shows the current map matching FRAP. |
| 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 | Located on Page 6-8 “setting and Risk” section of the SE.  The city refers to the Multi-jurisdictional HMP that identifies fire history as well in paragraph 4 of page 6-8 of the SE.  Reference made LHMP May 17th revision chapter 5 all of page 58 and 59 etc. |
| 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 6-8 Setting the Wildland Risk and Wildland Urban Interface Areas of the safety element discusses this section. |
| Have local, state, and federal agencies with responsibility for fire protection, including special districts and local offices of emergency services, been identified? | Yes | Covered in safety element page 6-8 under Wildland Urban Interface Areas. |
| 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 | Covered in Safety Element page 6-8 and page 6-14 Wildfire Hazards and Emergency Management sections. |
| Are residential developments in hazard areas that do not have at least two emergency evacuation routes identified? | Yes | Evacuation Route section and Map S-6. The city did an evacuation route study, Moreno Valley General Plan Emergency Evacuation Assessment memorandum, which I attached that addressed at this section. Page 6-15 of the Safety Element includes the following discussion: "An analysis of existing development patterns and roadway connectivity completed with the use of graphic information systems (GIS) software indicates that some residential areas in northern and southeastern portions of the city have constrained emergency access, including developments in the Sunnymead Ranch, Moreno Valley Ranch, and Hidden Springs developments. These are typically locations where residential development pre-dates incorporation into the City of Moreno Valley and where homes are constructed on cul-de-sacs with a single point of connection to the municipal roadway network. Approval of new development in these areas is conditioned on review by MVFD and the Moreno Valley Department of Public Works to ensure adequate emergency access. Additionally, Plan policy provides for use of the City’s early warning notification system to provide proactively alert to residents of areas with constrained access in the event of a disaster requiring emergency evacuation." We showed him a map created on the basis of the analysis and he agreed we did not need to include it in the Plan as access can change in these areas as the areas is bully built out. Additionally, Action S.2-C was created to specifically address this situation. Actions S.2-B and S.2-D, E, and G will also help address. |
| Have evacuation routes and their capacity, safety, and viability under a range of emergency scenarios been identified? | Yes | Addressed in detail in the Evacuation Routes section of the safety element and in the Moreno Valley General Plan Emergency Evacuation Assessment memorandum prepared for the city. Also Map S-6 Emergency Evacuation Risk Assessment |

| Is there any other information in the Safety Element regarding fire hazards in SRAs or VHFHSZs? |
| --- |
| Information located in the Vegetation Management and Clearance Standards section of the Safety Element and confirmed in municipal code …... |

## 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 | Safety element section Fire protection plan requirement, Vegetation management section, building signage standards, Wildland urban interface section paragraph 4, Water supply, and fire access sections all address this section.  Policy S.1-12, S1.13, S1.-14, S1.-17, S-1. 18. |
| Are there goals and policies to avoid or minimize new residential development in VHFHSZs? | Yes | S.1-15 Avoid, where feasible, locating new development in areas subject to high wildfire risk. If avoidance is not feasible, condition such new development on implementation of measures to reduce risks associated with that development. |
| Has fire safe design been incorporated into future development requirements? | Yes | S.1-13 and S1.16, Policy S.1-14 Fire protection plan requirement, Vegetation management section, building signage standards, Wildland urban interface section paragraph 4, Water supply, and fire access sections all address this section. |
| Are new essential public facilities located outside high fire risk areas, such as VHFHSZs, when feasible? | Yes | S.2.3: Locate critical facilities, such as hospitals and health care facilities, emergency shelters, fire stations, police stations, emergency command centers, and other emergency service facilities and utilities to minimize exposure to flooding, seismic, geologic, wildfire, and other hazards. |
| 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? | Partial | See Policies S.1-13: Jointly with State, County, local and other agencies, inform property owners of wildfire risks and measures to reduce those risks.  S.1-18: Continue to require proactive weed abatement, brush thinning, and removal services on new and existing development in High and Very High Fire Hazard Severity Areas in order to curb potential fire hazards.  S.1-I: Disseminate information on fire weather watches and fire risks via the City’s website and encourage all Moreno Valley residents to engage in risk reduction and fire preparedness activities. and 18; Actions S-1.H and I. Page 6-15 of the Safety Element includes the following discussion.  The above does not specifically address non-conforming road standards however the discussion and accompanying study listed on page 6-15 not only covers identification of areas without two points of access but provides for strategies on dealing with existing non-conforming roads in the case of an emergency. The city stated in our meetings they require road widening and structure hardening under the appropriate adopted fire and building code when residents and developers upgrade their homes and add to their properties as outlined in fire/building code. Recommend the city develop a specific policy to initiate plans or actions identified to mitigate existing non-conforming development to contemporary fire safe standards, in terms of road standards. |
| Does the plan include policies to evaluate re-development after a large fire? | Yes | S.1-20: Work with responsible agencies and nongovernmental organizations to plan for post-fire recovery in a manner that reduces further losses or damages from future fires. |
| Is fuel modification around homes and subdivisions required for new development in SRAs or VHFHSZs? | Yes | S.1-17 Require new development in VHFHSZs to enter into a long-term maintenance agreement for vegetation management in defensible space, fuel breaks, and roadside fuel reduction.  S.1-18 Continue to require proactive weed abatement and, brush thinning and removal services on new and existing development in High and Very High Fire Hazard Severity Areas in order to curb potential fire hazards |
| Are fire protection plans required for new development in VHFHSZs? | Yes | S.1-14: Require new development in Very High FHSZs to prepare a Fire Protection Plan that minimizes risks … (See SE pg. 6-13 for full text) |
| Does the plan address long term maintenance of fire hazard reduction projects, including community fire breaks and private road and public road clearance? | Yes | Vegetation Management section covers. Policy S1.-17, S1.18, S1.19. This is adequate for the scope of this city and land area covered. |
| Is there adequate access (ingress, egress) to new development in VHFHSZs? | Yes | Covered in on page 6-10 “Fire Access Standards.”  Policy S.1-14, S.1-16: covers this section. |
| Are minimum standards for evacuation of residential areas in VHFHSZs defined? | Yes | Addressed in detail in the Evacuation Routes section of the safety element and in the Moreno Valley General Plan Emergency Evacuation Assessment memorandum prepared for the city. Also Map S-6 Emergency Evacuation Risk Assessment |
| If areas exist with inadequate access/evacuation routes, are they identified? Are mitigation measures or improvement plans identified? | Yes | Addressed in detail in the Evacuation Routes section of the safety element and in the Moreno Valley General Plan Emergency Evacuation Assessment memorandum prepared for the city. Also Map S-6 Emergency Evacuation Risk Assessment; Vegetation Management section’ and Policy S1.-18, S1.18 covers |
| 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-1.13 Jointly with State, County, and other agencies, inform property owners of wildfire risks and measures to reduce those risks.  Action S-1. I Disseminate information on fire weather watches and fire risks via the City’s website and encourage all Moreno Valley residents to engage in risk reduction and fire preparedness activities. |
| Does the plan identify future water supply for fire suppression needs? | Yes | see p.6-10 and Policy S-1.16 and EMWD’s UWMP. |
| Does new development have adequate fire protection? | Yes | S.1-19 Cooperate with the Riverside County Fire Department and CALFIRE to ensure that all portions of the Planning Area are served and accessible within an effective response time and to address regional wildfire threats. See p.6-10 and Policy S-1.16 Require that all new development located in a Very High Fire Hazard Severity Zone (VHFHSZ) or a State Responsibility Area (SRA) is served by adequate infrastructure, including safe access for emergency response vehicles, visible street signs, and water supplies for fire suppression.  SE Emergency Management section |

### 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 section of the SE covers plus EMWD’s UWMP.  Fire code fire flow appendix adopted |
| Location of anticipated water supply? | Yes | See p.6-10 and Policy S-1.16. City is not a water purveyor, but EMWD’s UWMP addresses supply to SRA and VHFHSZs. 2040 General Plan does not propose new development over and above that already permitted in these areas. |
| Maintenance and long-term integrity of water supplies? | Yes | See p.6-10 and Policy S-1.16 and EMWD’s UWMP addresses supply to SRA and VHFHSZs. |
| Evacuation and emergency vehicle access? | Yes | Addressed in detail in the Evacuation Routes and Fire Access Requirements sections of the safety element and in the Moreno Valley General Plan Emergency Evacuation Assessment memorandum prepared for the city. Also Map S-6 Emergency Evacuation Risk Assessment Policy S.2-7, S.1-14: S.1-16, |
| Fuel modification and defensible space? | Yes | policy S.1-17: Require new development in VHFHSZs to enter into a long-term maintenance agreement for vegetation management in defensible space, fuel breaks, and roadside fuel reduction.  Vegetation Management section. Fire protection plan requirement Policy S1.-14, S.1-18, |
| Vegetation clearance maintenance on public and private roads? | Yes | policy S.1-17: Require new development in VHFHSZs to enter into a long-term maintenance agreement for vegetation management in defensible space, fuel breaks, and roadside fuel reduction. |
| Visible home and street addressing and signage? | Yes | See p.6-10 heading “BUILDING SIGNAGE STANDARDS AND REGULATIONS  The City enforces uniform building address and street sign letters as found in the California Fire Code and Uniform Building Code, which establishes requirements for the design and display of approved address numbers, building numbers, or approved building identification on new and existing buildings to ensure legibility and visibility from the street or road fronting the property. |
| Community fire breaks? Is there a discussion of how those fire breaks will be maintained? | Yes | Vegetation Management section, Policy S1.14, S1.-17 covers this section. |

### Section 3Working 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 | Page 6-9 Map S-5: Fire Hazard Severity Zones. |
| Does the plan include an assessment and projection of future emergency service needs? | Yes | Emergency management is discussed on pp.6-14Thru 6-16 of the Draft Safety Element. Fire and Police services are discussed in the Parks and Public Services Element. Policy S.1-19: |
| Are goals or standards for emergency services training described? | Yes | See p.6-14 thru 6-15 for narrative description related to training of City staff, see Policy S-2.1 Re community training, see Policy S-2.7 and Action S-2. B and D  Training Section page 6-14 SE Covers |
| Does the plan outline inter-agency preparedness coordination and mutual aid multi-agency agreements? | Yes | See p.14 and Policies S.2-2: Maintain area-wide mutual aid agreements and communication links with partner agencies and other participating jurisdictions. Policies S-2.4 and S.2-4: Maintain and periodically update the Emergency Operations Plan to effectively prepare for, respond to, recover from, and mitigate the effects of natural or human caused disasters that require the planned, coordinated response of multiple agencies or jurisdictions. and Policy 2.5 Partner with Caltrans and neighboring jurisdictions on measures to protect critical evacuation routes such as SR-60 and I-215 and work with local agencies to develop contingency plans for operations when these and other roads are inoperable due to; Action S-2.A |

# 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.